

Appendix E

Public Scoping Report

FINAL

PUBLIC SCOPING REPORT

FOR THE
ENVIRONMENTAL IMPACT STATEMENT
FOR DISPOSAL AND REUSE OF LRA PARCEL 20 AT SAVANNA
ARMY DEPOT ACTIVITY

CARROLL AND JO DAVIESS COUNTIES, ILLINOIS



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ACRONYMS AND ABBREVIATIONS

1997 BRAC EIS

Environmental Impact Statement for BRAC 95 Disposal and Reuse of the
Savanna Army Depot Activity, Savanna, Illinois

2000 PA Programmatic Agreement among United States Army, Illinois State Historic
Preservation Officer, and Advisory Council on Historic Preservation

2023 LRA Reuse Plan

Jo Carroll Depot Local Redevelopment Authority Final Reuse Plan for Parcel 20,
Former Savanna Army Depot

ACHP Advisory Council on Historic Preservation

APE area of potential effects

Army Department of the Army

BRAC Base Realignment and Closure

CERCLA Comprehensive Environmental Response, Compensation, and Liability Act of
1980

CFR Code of Federal Regulations

DoD U.S. Department of Defense

EIS environmental impact statement

EO executive order

ft foot, feet

GHG greenhouse gas

LOLO lift-on/lift-off

LRA Local Redevelopment Authority

LUC land use control

MOA Memorandum of Agreement

NEPA National Environmental Policy Act of 1969

NOI notice of intent

NRHP National Register of Historic Places

PA programmatic agreement

PFAS per- and polyfluoroalkyl substances

PV photovoltaic

SC-GHG social cost of greenhouse gases

SHPO State Historic Preservation Officer

SIP Savanna Industrial Park

SVADA Savanna Army Depot Activity

U.S. United States

U.S.C. United States Code

UMRNWFR Upper Mississippi River National Wildlife and Fish Refuge

USACE U.S. Army Corps of Engineers

USEPA U.S. Environmental Protection Agency

USFWS U.S. Fish and Wildlife Service

USPS U.S. Postal Service

1.0 INTRODUCTION

The Department of the Army (Army) is preparing an environmental impact statement (EIS) to analyze the potential effects on the human and natural environments of the Army's Proposed Action of disposal of an approximately 132-acre land parcel at the Savanna Army Depot Activity (SVADA), Illinois. Under the Proposed Action, the Army would dispose of the parcel through transfer to the Jo-Carroll Depot Local Redevelopment Authority (LRA) or other appropriate recipient for their reuse. The EIS will analyze the potential direct effects of the Army disposing of the parcel, known as LRA Parcel 20, through conveyance, and the potential indirect effects of reuse of the parcel by the recipient.

The Army is preparing the EIS in compliance with the National Environmental Policy Act of 1969, as amended (NEPA) (Title 42 of the *United States Code* [U.S.C.]§ 4321 *et seq.*) and the Army's NEPA implementing regulations, *Environmental Analysis of Army Actions* (Title 32 of the *Code of Federal Regulations* [CFR] Part 651).

The U.S. Department of Defense (DoD) 1995 Base Realignment and Closure (BRAC) Commission made recommendations for realignment and closure of military installations in accordance with the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510, as amended). The recommendations included closure of SVADA, which is located in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties (Figure 1). The Army published the final *Environmental Impact Statement for BRAC 95 Disposal and Reuse of the Savanna Army Depot Activity, Savanna, Illinois* in July 1997 (the 1997 BRAC EIS) (USACE, Mobile District 1997). The Army officially closed SVADA in 2000. Following closure, the Army proposed disposal of SVADA's 13,061 acres because the property was excess to the Army's needs. Through the BRAC process, as SVADA property parcels are certified as clean from environmental contaminants, the Army transfers the parcels to federal, state, and local agencies. A total of 5,343.9 acres have been transferred to those agencies to date. The agencies that have taken ownership of SVADA parcels are the U.S. Fish and Wildlife Service (USFWS), the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the LRA. The LRA works to attract businesses to buy or lease land in their parcels, now known as the Savanna Industrial Park (SIP).

The Army included LRA Parcel 20 (formerly known as "FWS Parcel 5") in a 2003 Memorandum of Agreement (MOA) between the Army and the USFWS. The MOA allowed USFWS to conduct management rights on the parcel. In 2016, USFWS withdrew interest in the parcel. The Army officially identified the parcel as surplus in 2018 and the LRA completed the notice of interest process for the parcel that same year. In 2023, the LRA submitted to the Army the *Jo Carroll Depot Local Redevelopment Authority Final Reuse Plan for Parcel 20, Former Savanna Army Depot* (the 2023 LRA Reuse Plan) (JCD LRA 2023). The parcel is in Carroll County at the southeastern end of SVADA. The parcel has undeveloped forested and open land and a waterbody known as Commander's Pond. The SIP, the Apple River, and the Brickhouse Slough on the Mississippi River border the parcel. The Burlington Northern Santa Fe rail line bisects the parcel from northwest to southeast, and an Army sewage treatment plant is surrounded by LRA Parcel 20, but the rail line and the sewage treatment plant are not part of LRA Parcel 20 (Figure 2).

The EIS will analyze five alternatives:

- Alternative 1: No Action Alternative
- Alternative 2: Accelerated Disposal Alternative
- Alternative 3: Recreation Only Reuse Alternative
- Alternative 4: Recreation and Solar Reuse Alternative
- Alternative 5: LRA Reuse Alternative



Figure 1. SVADA Location Map.



Figure 2. LRA Parcel 20 Area Map.

Alternative 1, the No Action Alternative, is required by 32 CFR § 651.43(e) and serves as the baseline against which the Proposed Action and other alternatives are compared. Under Alternative 1, the Army would continue providing limited caretaking of LRA Parcel 20.

Alternative 2, the Accelerated Disposal Alternative, is the Army's Proposed Action of disposal of LRA Parcel 20 by transferring it to the LRA or other appropriate recipient. Under Alternative 2, the Army would take advantage of various property transfer and disposal methods that allow reuse of the property before environmental remedial action has been completed. The Army would transfer or dispose of the parcel prior to completion of environmental remediation and other environmental clearance but with a commitment to complete remediation or fund remediation to completion.

Under Alternative 3, the Recreation Only Reuse Alternative, the Army would transfer the parcel to a new owner who would implement only recreational improvements on LRA Parcel 20, such as an elevated, boardwalk-style walking trail; a canoe and kayak ramp on Commander's Pond; and a recreational area atop the capped landfill that is on the parcel (Figure 3). The recreational area could include parking, recreational fields, a dog park, and picnic tables or gazebos.

Alternative 4, the Recreation and Solar Reuse Alternative, would include the recreational development features of an elevated, boardwalk-style walking trail; a canoe and kayak ramp; and a parking area as described for Alternative 3, but not the recreational area atop the capped landfill. Instead, a solar photovoltaic (PV) array would be installed on top of the landfill (Figure 4). The solar power produced could be used on-site, fed into the local power grid, or a combination of the two.

For Alternative 5, the LRA Reuse Alternative, the LRA proposes in their 2023 LRA Reuse Plan to develop the parcel into a port with docks, wharves, conveyor systems, and roads plus recreational facilities and potentially solar development (JCD LRA 2023). The LRA's proposed development would occur on LRA Parcel 20 and extend outside the boundary of the parcel into the Apple River, the Brickhouse Slough, and along Apple River Island in the Mississippi River. To facilitate implementation, the LRA designed their reuse alternative in three sequential phases (see Table 1 and Figures 5 through 7). Phase 1 would be implemented within a 5-year target completion window, while Phase 2 and Phase 3 would follow, with both having 5-year-plus completion windows. All three phases of the LRA Reuse Alternative would require dredging: about 186 acres in Brickhouse Slough under Phase 1; about 18 acres in Commander's Pond under Phase 2; and about another 42 acres in Commander's Pond under Phase 3. Phase 1 of the LRA Reuse Alternative prioritizes development of a barge fleeting area along Apple River Island, a dry bulk and liquid bulk wharf on the Brickhouse Slough with a road connecting it to the SIP, and recreational and/or solar uses on LRA Parcel 20. Phase 2 adds 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 drydock area. Phase 3 would include another LOLO wharf to increase wharf handling capacity and a repair fleeting area.

Table 1. Alternative 5: LRA Reuse Alternative by Phase for LRA Parcel 20

LRA Reuse Plan features	Phase 1	Phase 2	Phase 3
Development Features by Phase			
Barge fleeting area (Apple River Island)	X		
Bulk liquid transfer line, 10,980 linear feet (LRA Parcel 20 and Brickhouse Slough)	X		
Conveyor system, 10,500 ft x 2 ft (LRA Parcel 20 and Brickhouse Slough)	X		

LRA Reuse Plan features	Phase 1	Phase 2	Phase 3
Development Features by Phase			
Dry and liquid bulk wharf, 800 ft x 100 ft (Brickhouse Slough)	X		
Floating dry dock, 120 ft x 80 ft (Brickhouse Slough)	X		
LOLO wharf, 350 ft x 50 ft (this is also included in the L-shaped LOLO wharf listed below)			X
L-shaped LOLO wharf, 600 ft x 50 ft and 290 ft x 75 ft		X	
Recreational parking area (existing, unpaved)	X		
Recreational boat ramp for canoes/kayaks, 75 ft x 70 ft	X		
Recreational boat ramp access trail for canoes/ kayaks (elevated boardwalk), 300 ft x 10 ft	X		
Recreational trail (elevated boardwalk), 9,500 ft x 10 ft	X		
Recreational area or solar PV arrays atop capped landfill, 675 ft x 755 ft	X		
Repair fleeting area, 450 ft x 120 ft			X
Travel lift piers (two at 200 ft x 20 ft) with a landside dry dock (750 ft x 65 ft)		X	
Wharf access road, 425 ft x 40 ft (LRA Parcel 20 and Brickhouse Slough)	X		
Dredging (in Brickhouse Slough and Commander's Pond) by Phase			
Dredging (estimated acreage)	186 acres	18 acres	42 acres ^a
Dredging volumes (estimated yd³)			
Brickhouse Slough	399,228		
Commander's Pond dredge cut		Contaminated:190,739	
		Noncontaminated:333,794	
		Total: 524,533	
Commander's Pond aquatic habitat restoration area			Contaminated:114,069
			Noncontaminated:199,620
			Total: 313,689
Cumulative dredge volume by phase (yd ³)	399,228	923,761	1,237,450

Sources: Gajjar 2023a, 2023b, 2023c, personal communication; JCD LRA 2023; Roche 2025, personal communication.

Notes: ft = foot, feet; yd³ = cubic yards.

^a Includes 16 acres of aquatic habitat restoration area.



Figure 3. Alternative 3: Recreation Only Reuse Alternative.



Figure 4. Alternative 4: Recreation and Solar Reuse Alternative.

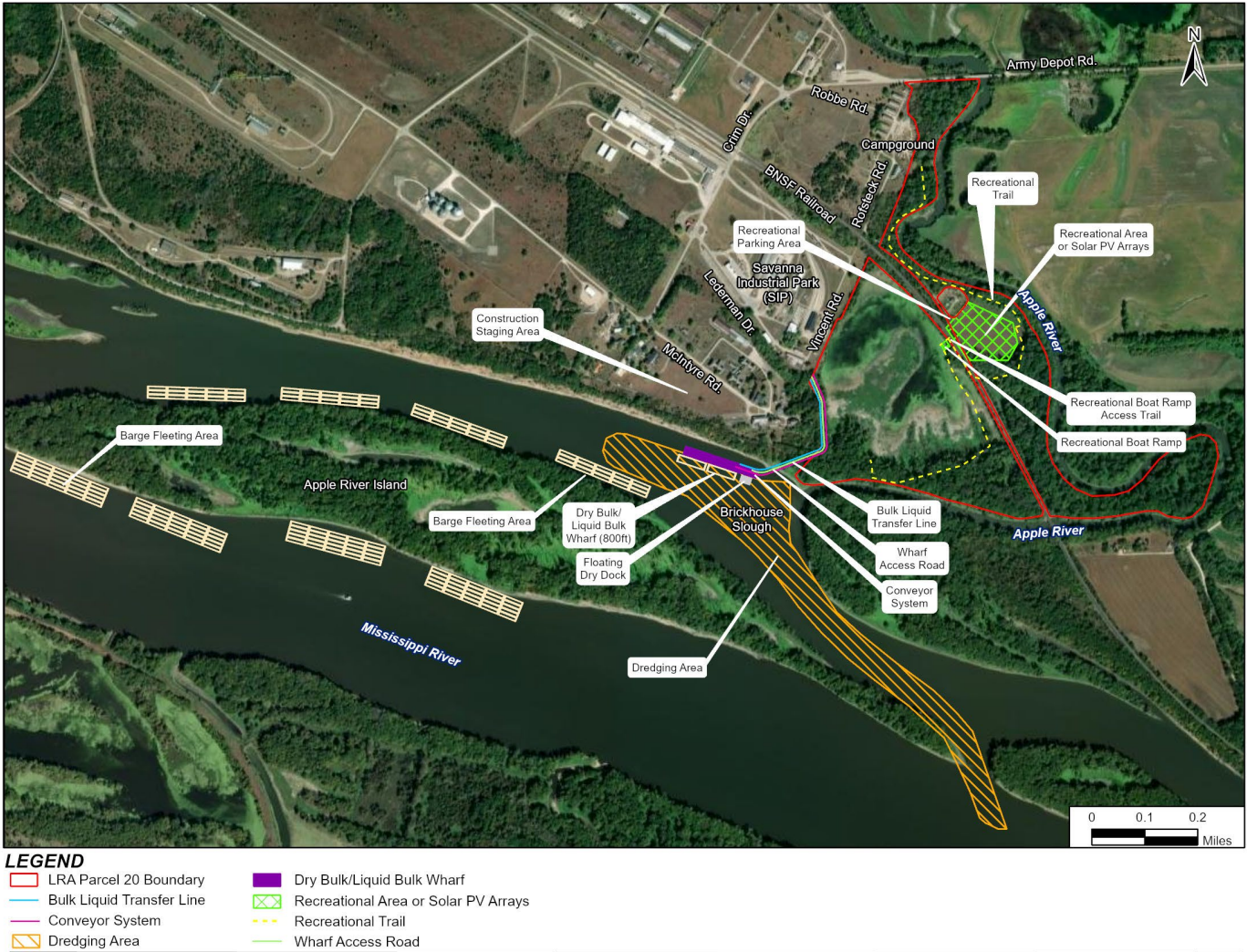


Figure 5. Alternative 5: LRA Reuse Alternative, Phase 1.



Figure 6. Alternative 5: LRA Reuse Alternative, Phase 2.



Figure 7. Alternative 5: LRA Reuse Alternative, Phase 3.

2.0 PUBLIC OUTREACH

Public outreach is required for an EIS per 32 CFR § 651.47. The intent of public outreach during the NEPA process is to inform the public of a proposed federal action and to provide for the public's meaningful involvement so that the federal agency is informed of the public's views on the action. Scoping is required for an EIS per 32 CFR § 651.14(d). Scoping is the requirement that federal agencies determine the scope and significant issues for analysis in an EIS using an early and open process. The scoping process is designed to identify areas of public concern early in EIS development and make available a mechanism through which stakeholders can share those concerns and provide to the Army related data and historical perspectives.

To effectively define the full range of actions, alternatives, and effects to be evaluated in the LRA Parcel 20 EIS, the Army invited potential stakeholders, including elected officials; local, state, and federal government agencies; federally recognized Native American Tribes; businesses; historic preservation organizations; nongovernmental organizations; and private citizens to participate in the scoping process.

2.1. Notice of Intent

On December 20, 2024, the Army published the notice of intent (NOI) to prepare the SVADA LRA Parcel 20 EIS in the *Federal Register* (89 FR 104109, December 20, 2024). Appendix A provides a copy of the NOI. The NOI was published in accordance with 32 CFR § 651.22. With publication of the NOI, the Army initiated the public scoping process to involve the public early in planning and developing the EIS and to help identify issues to be addressed in the environmental analysis.

2.2. Public Notification

In addition to the publication of the NOI in the *Federal Register*, the Army published a notice in the print edition of the *Savanna Times-Journal* on December 19, 2024, and on mycarrollcountynews.com on December 20, 2024. The public notice announced the Army's intent to prepare the EIS for the SVADA LRA Parcel 20 Proposed Action, solicited comments from the public, provided information on how and when comments could be submitted, and invited the public to attend a public scoping meeting to be held at the local high school on January 16, 2025. Appendix B provides a copy of the public notice.

The Army developed an initial stakeholder distribution list that included 326 stakeholders who would potentially be affected by or have an interest in the SVADA LRA Parcel 20 Proposed Action. The distribution list was used to notify those parties of scoping opportunities in the SVADA LRA Parcel 20 EIS development process. The stakeholder distribution list includes elected officials; local, state, and federal agencies; federally recognized Native American Tribes; nongovernmental organizations; businesses; and private citizens who are owners or occupants of nearby residences. The stakeholder list includes local government and charitable organizations that support underserved communities. These agencies and organizations include health departments, housing authorities, mental health services, senior services, veterans services, and public and private charitable organizations. Appendix C provides a copy of the stakeholder distribution list.

Concurrent with publication of the NOI and the public notice, the Army sent letters by the U.S. Postal Service (USPS) first-class mail to the stakeholder distribution list the week of December 15, 2024. The letters provided notice of the preparation of the EIS, identified the Proposed Action, described the scoping process and how and when comments could be submitted, and

extended an invitation to a public scoping meeting. On December 19, 2024, the Army also sent a copy of the letter to all for whom email addresses were available and sent a follow-up email with a “digital postcard” on January 9, 2025, to remind recipients of the Army’s solicitation for public comment and of the public meeting. Appendix D provides a copy of the scoping letter template and the digital postcard. In total, the Army sent 326 scoping letters and 158 emails to the stakeholders on the distribution list, inviting them to the January 16, 2025, public scoping meeting.

2.3. Project Website

The SVADA LRA Parcel 20 EIS project information is available on a USACE, Great Lakes and Ohio River Division BRAC webpage at <https://www.lrd.usace.army.mil/Public-Notices/Programs/Article/3901394/base-realignment-and-closure-brac/>. The SVADA LRA Parcel 20 EIS project information became accessible to the public on the webpage on December 19, 2024.¹ The USACE has had real estate responsibilities for conveyance of closing Army and Air Force installations under BRAC, as explained on the webpage. The webpage provides an overview of the SVADA LRA Parcel 20 EIS project and provides links to the following informational documents:

- The NOI published December 20, 2024
- The public notice published December 19, 2024, in the *Savanna Times-Journal*
- A downloadable and printable copy of the public scoping comment form
- The informational banners displayed at the public scoping meetings
- The 2023 LRA Reuse Plan
- The 1997 BRAC EIS

The website also provides the date, time, and location information for the EIS public scoping meeting. The website explains how, when, and where to submit comments in person or in writing, and provides an email address and a mailing address for submitting comments. The website also provides email addresses and phone numbers for the Army Public Affairs Office and the USACE, Mobile District office for assistance under the Americans with Disabilities Act, and for other questions or concerns.

2.4. Scoping Meetings

2.4.1. Agency and Tribe Scoping Meeting

The Army held a scoping meeting for federal and state agencies and federally recognized tribes the morning of January 16, 2025, from 10:00 a.m. to about 1:00 p.m. Central Standard Time. The meeting was held at the USFWS Upper Mississippi River National Wildlife and Fish Refuge (UMRNWFR) Ingersoll Wetlands Learning Center, 7071 River Road, Thomson, IL 61285. The Army sent a meeting invitation letter to the agencies and tribes on December 18, 2024, via Federal Express, and emailed the invitation letter on December 19, 2024. Appendix E provides copies of the meeting invitation letter templates and email. The agency and tribe distribution list is provided in Appendix F. A total of 24 people attended the agency and tribe scoping meeting. The sign-in sheets are provided in Appendix G.

The Army displayed informational banners and presented a PowerPoint (PPT) presentation at the agency and tribe meeting. Each participant received hardcopies of the PPT presentation and the

¹ The original project website address used from December 2024 to March 2025 was <https://www.lrd.usace.army.mil/Submit-ArticleCS/Programs/Article/3901394/>. USACE, however, had to change the URL in March 2025 to comply with new directives from the White House.

agency and tribe scoping comments that the Army had received to date. Appendix H provides the banners and Appendix I provides the PPT presentation from the meeting.

The agency and tribe scoping meeting proceedings began with introductory remarks by Tom Lineer, Army BRAC Program Manager. Beverly Hayes, the Project Manager from Tetra Tech (the USACE, Mobile District's contractor), delivered a PPT presentation and covered topics that included a project overview, the project schedule, the Proposed Action and alternatives, known cultural and environmental resources of concern, and known encumbrances. The meeting was then opened to discussion. Topics included cultural sites within the project's area of potential effects (APE), impacts on the Mississippi River navigation channel, impacts on road conditions and traffic volume, management of dredged material, munitions and explosives of concern, ongoing public communication, property boundaries and property ownership, and a request from an agency to receive an administrative copy of the draft EIS for review and comment before it is released to the public at large.

The Army took minutes at the agency and tribe scoping meeting, which are provided in Appendix J. The main takeaways from the meeting discussion were the following:

- Not enough information is available about the LRA Reuse Alternative.
- There is less concern about the transfer of LRA Parcel 20 than about its potential reuse.
- Several agencies believe it would be appropriate to conduct supplemental analysis in the future to support permits for the LRA Reuse Alternative.
- The Army needs to decide about conducting additional public outreach and engagement beyond that required by Army NEPA implementing regulations.
- The attending agencies need to decide if they want to become cooperating agencies on the EIS.

2.4.2. Public Scoping Meeting

The public scoping meeting was held the evening of January 16, 2025, from 5:00 p.m. to 6:30 p.m., at West Carroll High School, 500 Cragmoor Street, Savanna, IL 61074. The public was notified of the meeting via USPS first-class mail on December 15, 2024, and via email on December 19, 2024, and January 9, 2025, as described in Section 2.2. A total of 38 people attended the public scoping meeting. The sign-in sheet is provided in Appendix K.

At the public meeting, each participant received a fact sheet and a comment form that could be used to submit written comments at the meeting or mailed or emailed to the Army at a later date. Appendix L and Appendix M provide copies of the fact sheet and the comment form, respectively. The Army also displayed the informational banners from the agency and tribe scoping meeting at the public meeting. Army, USACE, and contractor personnel were on hand to answer questions. An LRA representative also was present and available to answer questions about their proposed reuse plan. The Army hired a court reporter to be available to take oral comments from the public. The court reporter's transcript is provided in Appendix N.

The public scoping meeting was an open-house style meeting. Proceedings began with Tom Lineer welcoming the public and introducing the Army, Army contractor, and LRA personnel in attendance. The public was invited to register on the sign-in sheet, view the informational display banners, and converse with Army and Army contractor personnel with their questions about the project. The LRA also was available to discuss their proposed reuse alternative with the public. The public submitted handwritten comments on the provided comment form and oral comments to the court reporter.

2.5. Scoping Comment Submittal

The scoping period began with the Army's publication of the NOI on December 20, 2024, in the *Federal Register*. The Army extended the scoping period from the required 30-day minimum to almost 60 days (until February 15, 2025) to allow more time for interested parties to learn about the proposed project and provide their input. On February 6, 2025, the Army received an email from the U.S. Environmental Protection Agency (USEPA) Region 5 requesting an informal extension of the comment period until March 7, 2025, to allow USEPA time to ensure alignment of its comments with new and revoked executive orders (EOs) issued since January 20, 2025, by President Trump. The Army granted USEPA Region 5's request for an extension until March 15, 2025. The Army sent another letter on February 27, 2025 to agencies and Tribes to notify them of additional cultural archaeological sites that could be affected by reuse of LRA Parcel 20. On March 21, 2025, the Army received an email from USFWS UMRNWFR Savanna District Office asking for a 10-day extension to respond to the letter, and the Army granted the extension until March 31, 2025. The Army notes that NEPA implementing regulations allow for anyone to submit comments at any time during the NEPA process.

The Army invited written comments by email and mail during the scoping period and by the notices published in the *Federal Register*, the *Savanna Times-Journal*, and on the internet. At the scoping meetings, the Army encouraged attendees to submit written comments using the comment form, provide oral comments to the court reporter, or submit written comments after the meetings by email or mail. The Army will accept comments at any time during the environmental impact analysis process; however, to ensure the Army has sufficient time to consider public input during preparation of the draft EIS, the Army encouraged the public to submit comments by the end of the scoping period. Any comments received after that date will be considered to the maximum extent practicable during preparation of the EIS and included in the administrative record. Depending on the timing of their receipt, however, they might not have been captured in this report.

Scoping comments could have been and can be submitted in the following ways:

- By email sent to SVADAEIS@tetrattech.com
- By the USPS to SVADA EIS c/o Tetra Tech, 107 St. Francis Street, Suite 2370, Mobile, AL 36602
- By providing oral comments to the court reporter during the scoping meetings
- By providing written comments on the comment form during the scoping meetings

Scoping comments received by April 25, 2025, have been logged and categorized for review. This Public Scoping Report has been prepared to briefly provide the following information on the scoping meetings: attendance level, number of comments received, comment submittal method, commentor affiliation, commentor opinion of the Proposed Action, and key topics of concern.

3.0 SCOPING COMMENT ANALYSIS

Every scoping comment received by the April 30, 2025 publication date of this public scoping report has been reviewed and categorized by affiliation, submittal method, opinion, and topic of concern and included in this report. The scoping comments also will be filed in the EIS administrative record. Appendix O provides copies of all comment documents, as received. Appendix P provides a spreadsheet of the categorized comments received with additional classification information. A small number of comment submittals are expected to be received beyond the publication of this public scoping report. The Army will consider them to the maximum extent practicable during preparation of the draft EIS, but they have not been considered in the analysis in this scoping report.

Note: Most of the comments received are in regard to the LRA Reuse Alternative. Comments that included the Army's Proposed Action of disposal and the No Action Alternative were from a regulatory standpoint, such as comments requesting a clear description in the EIS of the Proposed Action, the No Action, and all action alternatives, as well as alternatives dismissed from EIS analysis, per NEPA implementing regulations. From discussion at both the agency and tribe scoping meeting and the public scoping meeting, and the subsequent comments received, the public expressed concern about the parcel's potential reuse, rather than its disposal and transfer. This is expected, as the reuse is what would cause effects on the human and natural environments. The scoping comment analysis in this section, therefore, focuses on the LRA Reuse Alternative.

The Army is aware of the January 20, 2025, rescission of EO 13990, *Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis*, and of EO 14008, *Tackling the Climate Crisis at Home and Abroad*; however, comments regarding climate change, greenhouse gases (GHGs), and the social cost of greenhouse gases (SC-GHG) made prior to that date have been retained to maintain a full count of the comments received. The Army typically covered these topics in an EIS in the air quality resource section.

The Army also is aware of the January 20, 2025, rescission of EO 14096, *Revitalizing Our Nation's Commitment to Environmental Justice for All*, and of the January 21, 2025 rescission of EO 12898, *Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations*, and will not analyze environmental justice in the EIS; however, the public scoping comments regarding environmental justice were made prior to those dates and have been retained only to maintain a full count of the comments received.

3.1. Comment Processing

During the scoping period, 55 interested parties provided a total of 65 comment submissions (by email, letter, or statements made to a court reporter) and a total of 297 comments. For all submissions and statements, members of the EIS development team transcribed them if needed, scanned then, numbered them, and coded each individual comment.

Table 2 summarizes the number of comment submittals by method. The majority of the comments (about 64 percent) were received by letter.

Table 2. Comment Submittal Method Summary

Method	Number of comments	Percent
Comment Form	3	1.0%
Email	93	31.3%
Letter	191	64.3%
Oral	10	3.4%
Total	297	100%

3.2. Commentor Affiliation

Comment submittals came from commenters with various affiliations, capturing the concerns and insights from a broad range of stakeholders. Table 3 summarizes the number of comment submittals by affiliation. The majority of the commentors (almost 63 percent) identified themselves as federal government.

Table 3. Commenter Affiliation Summary

Affiliation	Number of submissions	Percentage
Elected Official	5	1.7%
Local Government	16	5.4%
State Government	16	5.4%
Federal Government	186	62.6%
Native American Tribe/Organization	3	1.0%
Business/Commercial Organization	8	2.7%
Historic Preservation Organization	0	0.0%
Nongovernmental Organization	0	0.0%
Private Citizen	63	21.2%
Other	0	0.0%
Total	297	100.0%

3.3. Comment Opinion on LRA Reuse Alternative

Opinions expressed in support or opposition were all in regard to the LRA Reuse Alternative. Table 4 presents a breakdown of the commenters' opinions. Approximately 13 percent of the commenters were supportive of the LRA Reuse Alternative, 33 percent were opposed to it, and 53 percent were neutral. Following Table 4 is a summary of the support, opposition, and neutral comments received.

Table 4. LRA Reuse Alternative Project Opinion Summary

Opinion of Proposed Action	Number of submissions	Percent
Support	39	13.1%
Oppose	99	33.3%
Neutral	159	53.5%
Total	297	100.0%

3.3.1. Support for the LRA Reuse Alternative

The LRA Reuse Alternative received supporting comments from a federal government agency, local government representatives, and private citizens. These stakeholders all expressed support for the LRA's proposed port because of potential economic benefits. The U.S. Department of Transportation Maritime Administration said the LRA's proposal would be consistent with the Maritime Administration's Port Conveyance authority. Local government and private citizens support the project because it would bring much needed economic development and jobs to the region, which has seen its industry and population continue to decline since the closure of SVADA. Stakeholders made comments in support of proposed recreational features and felt that they would increase tourism. One stakeholder expressed support for the proposed port because they felt dredging might reduce flooding of adjacent farmland. Another saw the LRA Reuse Alternative as a potential funding source for repairing Army Depot Road.

3.3.2. Opposition to the LRA Reuse Alternative

Opposition to the LRA Reuse Alternative was expressed by one federal agency (USFWS UMRNWFR Savanna District Office) and the remainder of the opposing comments were from local private citizens. USFWS UMRNWFR Savanna District Office is in opposition to the LRA's proposed port with fleeting facilities because it would be "...in violation of numerous Federal laws, most directly but not limited to the National Wildlife Refuge System Improvement Act of 1997" (16 U.S.C. § 668 *et seq.*) as the proposed port would be adjacent to and have features that would extend beyond the LRA Parcel 20 boundary into the UMRNWFR. USFWS UMRNWFR Savanna District Office further commented that "Federal law prohibits the construction and operation of this type of commercial facility on National Wildlife Refuges." USFWS UMRNWFR Savanna District Office also noted the port would extend into USFWS and USACE, Rock Island District owned fee title lands and river bottom jurisdiction, and would impact the navigation channel, navigation features such as wing dams, and listed threatened and endangered species. USFWS UMRNWFR Savanna District Office also said the LRA has failed to consult with them on the proposed port and requested more details about the project, with dredging, habitat alteration, and navigation as particular areas of concern.

Private citizens were mostly in opposition to the LRA Reuse Alternative because it would have adverse impacts on environmental resources and overall aesthetics of the area, which in turn would adversely affect recreational opportunities. Stakeholders' comments expressed doubt that the LRA's projected economic benefit from a port would come to fruition, and that the number of jobs that would be created at the port would not outweigh the economic loss from recreational tourism. Some expressed concern that the port could disturb buried munitions or chemicals (e.g., per- and polyfluoroalkyl substances [PFAS]) that might remain from when the land was an Army depot. Another point of opposition was the amount of noise and traffic the port could bring to the region, noting that Army Depot Road, the access road from Illinois Route 84 to the port, is in poor condition. Some private citizens also echoed USFWS UMRNWFR Savanna District

Office's objections to the LRA's proposed port impacting the UMRNWFR, endangered species, and the navigation channel.

3.3.3. Neutral to the LRA Reuse Alternative

A little over one-half of the comments were neutral toward the LRA Reuse Alternative. The neutral comments came primarily from federal and state regulatory agencies, focused on requesting additional information and clarification regarding the LRA Reuse Alternative's scope, potential impacts, and mitigation measures. The stakeholders also identified potential impacts from the LRA Reuse Alternative and resource areas that need to be addressed in the EIS. Regulatory agencies highlighted the need for the LRA Reuse Alternative to comply with cultural and environmental preservation laws and environmental and navigation permitting requirements as well as with programmatic agreements (PAs) and real estate requirements. Some individuals simply sought a better understanding of the reuse implications without taking a definitive stance; particular areas of concern were dredging, land use controls (LUCs), the landfill cap, the Mississippi River navigation channel, and disturbance of potential contaminants or munitions in soil and water. Three federally recognized Native American Tribes responded, but did not express an opinion on the project. A few of the stakeholders expressed appreciation for the Army's communication and outreach for the project.

3.4. Comment Topics

The Army received comments from stakeholders on an array of key topics of concern. These topics reflect the diverse interests and priorities of the stakeholders involved. The stakeholders recommended various environmental, cultural, navigational, and socioeconomic issues to be addressed in the EIS. Table 5 lists the number of comments submitted by topic area. Brief descriptions of the individual topics follow the table. Topic areas receiving 1 percent or less of the comments are summarized in Section 3.4.14.

Table 5. Comments by Topic Area

Topic area	Number of comments	Percent
Aesthetic/Visual Resources	4	1.3%
Air Quality/Climate	6	2.0%
Biological Resources	38	12.8%
Coordination/Communication	26	8.8%
Cultural/Historic Resources	18	6.1%
Cumulative Effects	3	1.0%
Environmental Justice/Children	3	1.0%
Geology/Soils	0	0.0%
Hazardous Materials/Waste	25	8.4%
Land Use	16	5.4%
Mitigation	0	0.0%
Navigation	30	10.1%
NEPA	5	1.7%
Noise	1	0.3%
Proposed Action/Alternatives	14	4.7%

Topic area	Number of comments	Percent
Socioeconomics	23	7.7%
Traffic/Transportation	1	0.3%
Utilities/Infrastructure	11	3.7%
Water Resources	24	8.1%
General Support	9	3.0%
General Opposition	23	7.7%
Other	17	5.7%
Total	297	100%

3.4.1. Aesthetic/Visual Resources

Stakeholders' comments highlighted concerns about the impact of the LRA Reuse Alternative on the natural aesthetic and visual resources of the area along the Mississippi River. Stakeholders emphasized that the natural beauty and peacefulness of the project area have value as a place to relax and enjoy nature, not only for residents but also for visitors. The comments noted that the construction of a port and the barge fleet in the Mississippi River would disrupt the scenic views and tranquility that are appreciated by both locals and tourists.

3.4.2. Air Quality/Climate

Stakeholders' comments were focused on the LRA Reuse Alternative, potential emissions from that alternative, and the need to meet air quality standards. USEPA expressed concern about emissions from dredging, construction equipment, and operation and maintenance of the proposed port. USEPA wants to know the impact from the LRA Reuse Alternative on the National Ambient Air Quality Standards, air toxics standards, and the ability of Illinois to meet GHG reduction provisions. USEPA's comments provided guidance on what to include in the EIS air quality affected environment section, what to analyze in the effects section, and suggestions for best management practices and mitigation measures and included a Construction Emission Control Checklist attachment. Stakeholder comments on climate change, GHG, and SC-GHG provided standard agency guidance on assessing these resources in NEPA documents. USEPA expressed concern about changing climate conditions and extreme weather events that could affect the LRA's proposed port structures and operation.

3.4.3. Biological Resources

Biological resources received the most comments. Comments were focused on the LRA Reuse Alternative and expressed significant concerns about the potential impact of the port on biological resources, especially the UMRNWFR. Stakeholders highlighted that the UMRNWFR is protected under the National Wildlife Refuge System Improvement Act of 1997, that the port would be an adjacent and potentially incompatible use next to the Refuge, and that port features would extend into the UMRNWFR.

Stakeholders noted federally listed threatened or endangered species in the project area that could be impacted by the LRA Reuse Alternative: the Higgins eye pearlymussel (*Lampsilis higginsii*), the sheepsnout mussel (*Plethobasus cyphus*), and the tricolored bat (*Perimyotis subflavus*). The little brown bat (*Myotis lucifugus*), which is currently under federal review for listing, also was mentioned. State-listed species identified are the butterfly mussel (*Ellipsaria lineolate*), Higgins eye pearlymussel, James' clammyweed (*Polanisia jamesii*), pallid shiner (*Hybopsis amnis*), Plains hog-nosed snake (*Heterodon nasicus*), sheepsnout mussel, weed shiner (*Notropis texanus*),

and the western sand darter (*Ammocrypta clara*). Federal and state agency stakeholders noted the need for the project proponent to coordinate with its agencies on these species, recommended that a new mussel survey be conducted, and recommended mitigation measures for avoiding or reducing impacts on these species. The state went further and recommended that avian, herpetological, botanical, fish, and mussel surveys be conducted and coordinated with their office to confirm the absence or presence of those species in the project area. USEPA expressed concern about the impact of the LRA Reuse Alternative on habitat connectivity and ongoing restoration projects in the Mississippi River. Agencies also noted that more details are needed on the aquatic habitat restoration and dredging project features to aid in a full evaluation of the LRA Reuse Alternative.

USEPA commented about the potential for the LRA Reuse Alternative to spread aquatic and terrestrial non-native invasive species. The agency provided recommendations on addressing invasive species in the EIS.

USEPA also noted that trees would need to be removed under the LRA Reuse Alternative and that a tree disposal management plan would need to be developed and recommended voluntary tree replacement as a mitigation measure.

Private citizens emphasized that the LRA Reuse Alternative would be detrimental not only to fish and wildlife, but also to the well-being of residents in the area. Stakeholders expressed concern about the dredging and its impact on biological resources and their habitat and want to know where the dredged material would be disposed. They also expressed concern about operation of the port and its impact on biological and water resources.

3.4.4. Coordination/Communication

The Army received comments regarding coordination and communication conducted during the NEPA process. Agencies responded positively to an Army invitation to a scoping meeting specifically for agencies and tribes. Federal and state agencies noted that NEPA requires the federal project proponent to consult with federal and state agencies, local governments, tribes, and affected landowners and to include copies of the communications in the EIS. USEPA noted that the LRA Reuse Alternative would require coordination with federal and state agencies regarding permitting and mitigation for various aspects of the proposed port. USFWS UMRNWFR Savanna District Office said the LRA has failed to consult with them on the proposed port and recommended that, going forward, the LRA should initiate timely coordination with USFWS staff so the LRA can better understand the limitations on use of the federally protected UMRNWFR lands.

3.4.5. Cultural/Historic Resources

Most of the comments were regarding the known cultural resources sites within LRA Parcel 20 boundary, the PA about cultural sites (*Programmatic Agreement among United States Army, Illinois State Historic Preservation Officer, and Advisory Council on Historic Preservation* (the 2000 PA) (AMC 2000), and a known cultural site outside of LRA Parcel 20 but within the APE for the LRA Reuse Alternative. The Advisory Council on Historic Preservation (ACHP) commented that the Army will be incorporating a preservation covenant in the transfer instrument for the transfer of LRA Parcel 20 to the LRA (or other appropriate recipient) because of the identified archaeological sites within the parcel. The ACHP also requested that, if any modifications are made to the 2023 LRA Reuse Plan, the ACHP and the Illinois State Historic Preservation Officer (IL SHPO) be notified. The ACHP also recommended that this request be included in the preservation covenant.

USFWS UMRNWFR Savanna District Office noted a USACE-designated environmentally sensitive area (Site 13-E-4) that, although it is outside of LRA Parcel 20 boundary, is along the Brickhouse Slough shoreline and within the project APE. The site has archaeological resources that would be impacted by erosion caused by boat traffic if the LRA Reuse Alternative is implemented. USFWS UMRNWFR Savanna District Office also noted that, in accordance with the 2000 PA for SVADA cultural resources, the Army will develop an archaeological site protection plan for National Register of Historic Places- (NRHP-) listed resources and NRHP-eligible resources; the Army and the LRA will maintain and preserve archaeological sites 11-CA-1 and 11-CA-142 under the preservation covenant to be incorporated into the transfer instrument for the parcel, with no construction, alteration, or disturbance of the sites without permission from the IL SHPO; the proposed port would disturb archaeological sites 11-CA-142 and 11-CA-143; and the LRA will need to contact USFWS UMRNWFR Savanna District Office to apply for an Archaeological Resources Protection Act (16 U.S.C. § 470aa *et seq.*) permit prior to conducting any work in the UMRNWFR.

USEPA provided recommendations for addressing historic and cultural resources in the EIS, including documenting coordination with IL SHPO and tribes, and for addressing the impacts of each alternative on historic and archaeological resources. USEPA also asked for the EIS to identify the process that would be used for addressing inadvertent discoveries and complying with the Native American Graves Protection and Repatriation Act, which would apply to the LRA Reuse Alternative.

The IL SHPO commented that the LRA Reuse Alternative as proposed will have no adverse effect on sites within LRA Parcel 20 (11-CA-1 and 11-CA-142), which have not been evaluated for listing in the NRHP as defined in 36 CFR § 800.5(b). They also commented that Site 11-CA-194 is not eligible for listing in the NRHP.

Native American Tribes requested continued consultation on the project, as the project is within the ancestral homelands of the Miami Tribe and possibly near the location of an archaeological site. The Winnebago Tribe of Nebraska commented that they have no concerns about the project because they have no known sites in the project area. A private citizen commented that they hoped the project would not disturb the ancient Indian grounds.

3.4.6. Hazardous Materials/Waste

A number of comments raised questions about past Army activity on LRA Parcel 20 and the possibility of chemicals of concern or munitions remaining on the site. The stakeholders were concerned that, if such materials are present, whether they might be disturbed and potentially be released into the environment.

Comments were made about the known Comprehensive Environmental Response, Compensation, and Liability Act of 1980 (CERCLA) (42 U.S.C. § 9601 *et seq.*) sites on the parcel, including the closed landfill. Stakeholders were concerned about dredging Commander's Pond, the potential release of contaminants into the water, and where the dredging material would be disposed of. Stakeholders commented that a dredge management plan needs to be prepared. One stakeholder specifically asked about the potential for contamination of groundwater and if buried hazardous materials on the site could cause cancer.

USEPA provided specific information on CERCLA sites on LRA Parcel 20, including the current status of the sites and their LUCs and land use control implementation plans. USEPA noted that the 2023 LRA Reuse Plan does not address but needs to address the following to aid in a full evaluation of the LRA Reuse Alternative (JCD LRA 2023): how the LUCs will be implemented and maintained; how potential exposure to munitions and munitions constituents will be mitigated; details and cost of the management, characterization, and disposal of dredged material;

investigation and remediation (if needed) of the CERCLA sites for PFAS; and how solar facility components would be installed on the landfill so as not to breach the landfill's cover system. Illinois Environmental Protection Agency comments reiterated many of the comments made by USEPA.

USEPA also noted that CERCLA sites on LRA Parcel 20 have not been investigated for PFAS contamination. As a result, it is unclear if the conceptual LRA Reuse Alternative and associated costing are sufficiently representative should a PFAS remedial action be warranted. USEPA recommend that the EIS consider how the LRA Reuse Alternative would be affected if a PFAS remedial action is undertaken.

3.4.7. Land Use

Stakeholders raised serious concerns about incompatible land use of the LRA Reuse Alternative, focusing on issues of land ownership and management and operation of a port within the UMRNWFR. USFWS UMRNWFR Savanna District Office commented that the LRA Reuse Alternative extends outside of the LRA Parcel 20 boundary and encroaches upon land and river bottom jurisdiction within the UMRNWFR. USFWS UMRNWFR Savanna District Office said that the National Wildlife Refuge System Improvement Act of 1997 prohibits the construction and operation of this type of commercial facility in the UMRNWFR. USFWS UMRNWFR Savanna District Office commented that the LRA has not consulted with the agency about their reuse alternative and that the proposed reuse will not be allowed under existing federal law.

USACE, Rock Island District noted that the LRA's proposed use of Apple River Island for fleeting would require the LRA to file a real estate application with the District to detail all known work or future work concerning the island, prior to the District considering issuing an outgrant.

Private citizens expressed concern that the proposed port would be incompatible with existing natural and recreational land uses.

3.4.8. Navigation

Navigation received the second most comments, behind biological resources. Stakeholders commented on potential impacts from the LRA Reuse Alternative on existing commercial navigation, the navigation channel, navigational hazards, river flow, river traffic patterns, river training structures (e.g., revetments and wing dams), sediment transport, and the unprotected bankline. Stakeholders asked for additional details on how LRA Parcel 20 would be accessed from the river, from which direction, and how that would change estimated dredged totals. They asked about dredging requirements to reach and maintain the required navigation depth. One stakeholder commented that fleeting along Apple River Island may encroach upon the Mississippi River's main navigation channel. Stakeholders provided regulatory guidance, noting that a Section 10 permit (which prohibits the obstruction or alteration of navigable waters of the United States) and a Section 408 permit (alterations to federal projects to ensure they do not compromise the original purpose of the project) from USACE will be required under the Rivers and Harbors Appropriations Act of 1899 (33 U.S.C. § 403). USACE, Rock Island District expressed concern that the LRA Reuse Alternative dredging would impact USACE's ability to maintain the navigation channel and about the potential effects on their long-term channel maintenance requirements, and requested multidimensional hydraulic modeling for the project.

3.4.9. NEPA

Comments about NEPA provided regulatory guidance. One stakeholder advised that, because the environmental impacts generated from the LRA's reuse action would not occur but for the

Army's action of transferring LRA Parcel 20, this connected action must be analyzed in the same NEPA document. USACE, Rock Island District advised the Army that USACE would be adopting the EIS to satisfy NEPA requirements for the civil works portion of the LRA Reuse Alternative. USEPA comments provided guidance on the content of an EIS, including providing copies of correspondence as an appendix to an EIS, providing a chart listing all review comments on the EIS as an appendix to the EIS, and providing a table in the EIS listing all mitigation measures and the corresponding responsible parties. USEPA also provided a list of recommended websites from which to obtain environmental information related to the project area.

3.4.10. Proposed Action/Alternatives

Several comments were received about the LRA Reuse Alternative. Stakeholders requested that for the LRA Reuse Alternative, the EIS should include maps showing all construction access, staging, and temporary road and mobilization locations, including areas of work within waterways.

One commenter questioned the viability of the LRA Reuse Alternative, stating that the LRA knows their proposed reuse will not be approved by USFWS.

Another comment said that it is well known that the LRA's Reuse Alternative includes a 50-foot easement from the current silos to Brickhouse Slough. The LRA has verified that a 50-foot easement is not part of their proposal (Roche 2025, personal communication).

3.4.11. Socioeconomics

Almost all the comments on socioeconomics were in support of the LRA Reuse Alternative. Stakeholders said the proposed reuse would generate much needed economic growth in the region, bringing in new commercial and industrial industry to a rural area. The port would create jobs, result in population growth, and support the tax base. In addition to the port, they also think the recreational elements could generate some new jobs through tourism. Some stakeholders complimented the LRA, noting that it has done extensive public outreach and research on plausible reuses while still considering the environment.

One stakeholder in opposition to the LRA Reuse Alternative said it is a waste of government grant money. They feel it is not an economically feasible alternative because the proposed port could not compete with existing ports along the river. They also said the port would generate very few new jobs.

USEPA provided recommendations on how to address socioeconomics in the EIS, including providing demographic information on the communities that could experience adverse environmental, human health, or socioeconomic effects, and projected changes in population and housing demand.

3.4.12. Utilities/Infrastructure

USEPA provided guidance on analyzing the potential impacts of port construction on existing utilities (potable water, sewer/septic, stormwater, and effluent discharge point sources) and existing infrastructure, including public and private piers and boat ramps in the vicinity of LRA Parcel 20. USEPA also provided recommendations for sustainability, including, but not limited to, achieving Leadership in Energy & Environmental Design certification at the platinum level; best practices for energy efficiency and sustainable building design; using permeable or porous materials for parking lots, roads, sidewalks, and other surfaces; applying green stormwater management practices, recycling construction and demolition debris, and using recycled materials in new construction.

Local stakeholders expressed concern about the poor condition of Army Depot Road, its ability to support additional traffic in its current condition, and the possibility of federal funding to repair the road.

3.4.13. Water Resources

Most of the stakeholder comments on water resources were from regulatory agencies (USACE, Rock Island District; USEPA; and USFWS UMRNWFR Savanna District Office), providing guidance for or identifying potential impacts from the LRA Reuse Alternative on water resources. They provided regulatory guidance on permits the LRA Reuse Alternative could require under Section 10 of the River and Harbors Act, sections 401 and 404 of the Clean Water Act (33 U.S.C. § 1251), and Section 408. They expressed concerns about dredging impacts on streams and wetlands, shoreline erosion from vessel traffic and fleeting causing sedimentation in the water, and stormwater runoff. The stakeholders noted that mitigation for these impacts will need to be addressed in the EIS. USEPA recommended a wetland delineation be conducted and included as an appendix to the EIS. They advised that the wetland delineation would need to include all LRA Reuse Alternative staging locations and staging and access roads.

Several comments pertained to flooding and floodplains. USACE, Rock Island District specifically noted that the Illinois Emergency Management Agency should be contacted to determine if the proposed LRA Reuse Alternative would impact floodways. USEPA noted that, as portions of the project area are in a 100-year floodplain, the EIS needs to analyze effects on downstream hydrologic flows, analyze the potential for increased downstream flooding, and identify design elements that would allow the LRA Reuse Alternative to be built safely within a floodplain. USFWS UMRNWFR Savanna District Office identified the potential hazard of large floating debris during flood events, such as solar panels dislodging and carried downstream. One stakeholder commented that dredging of Commander's Pond could be beneficial for nearby residences and farmland in reducing future flooding.

USEPA commented on sediments, recommending that, before the draft EIS is released for public review and comment, sediment testing should be completed and submitted to USACE. This pertains to the LRA Reuse Alternative, which would disturb sediment in Commander's Pond and Brickhouse Slough. USEPA recommended the EIS evaluate various reuse options for the sediment if the sediment is found to be clean enough for beneficial reuse.

USEPA requested details on what the aquatic restoration entails and how it would be managed.

USEPA recommended the EIS identify specific tools or mitigation measures that would be used to protect water quality during construction, dredging, and in-water work if the LRA Reuse Alternative is implemented.

For stormwater, USEPA recommended that the LRA Reuse Alternative incorporate robust resilience and risk reduction measures into project design and engineering, construction oversight, commitments for erosion and stormwater protection measures, and routine monitoring during project operation.

3.4.14. Topics Receiving Few Comments

A limited number of comments (1 percent or less for each topic area) were focused on the topics of cumulative effects, environmental justice, protection of children, geology and soils, mitigation, noise, and traffic and transportation.

The comments on cumulative effects provided standard agency guidance on considering past, present, and reasonably foreseeable effects for assessing cumulative impacts in NEPA documents.

Environmental justice was rescinded by EO after the public scoping meeting was held, and will not be analyzed in the EIS as explained at the beginning of Section 3.0.

Stakeholders commented on how adverse environmental resource area effects (e.g., harmful air quality emissions) could affect vulnerable populations, such as children.

There were no comments categorized as geology and soils. Comments about sediment are included under water resources.

Comments on mitigation were addressed under specific resource areas (e.g., under biological resources for mitigation of effects on federally listed threatened or endangered species).

The comment on noise expressed concern about noise effects from port operations not only on fish and wildlife species, but also on neighboring landowners and recreational visitors.

Traffic and transportation comments focused on the poor condition of Army Depot Road and its ability to handle additional traffic, which would need to be addressed. Stakeholders also requested more information on where contractor staging locations, access routes and locations, and mobilization locations would be during construction, if the LRA Reuse Alternative is implemented.

3.4.15. Other

Comments categorized as “Other” did not fall under a key resource topic of concern (e.g., aesthetic/visual resources, air quality, or biological resources). They are not comments on environmental, cultural, socioeconomic, or navigational resources. They are items such as introductory and closing statements of emails and letters, contact information, sources from which to obtain information, and an explanation of a commentor’s connection to or history with the project area.

3.5. Topics Directly Focusing the Scope of the Analysis in the EIS

During the scoping period, stakeholders raised issues of concern in their comments about the LRA Reuse Alternative that could influence the scope of the analysis in the EIS. The scoping process aids in determining the scope of issues for analysis in an EIS, identifying significant issues and eliminating from detailed consideration issues that are not significant, making the analysis and documentation more efficient by providing focus to the effort (32 CFR § 651.48). Below is a list of issues commented on during the scoping period. The list is divided into two groups: those that apply to EIS resource areas of concern and those that are of administrative or procedural concern. Those of administrative or procedural concern are requests by federal or state agencies for additional information, plans, surveys, or testing to be done for the LRA Reuse Alternative before the draft EIS is issued. The following list is not all inclusive. These are among the multitude of issues and concerns that can be included in an EIS.

- Resource Area Concerns for LRA Reuse Alternative
 - Air emissions from construction equipment and dredging for the proposed port, and operation and maintenance of the proposed port
 - Aquatic restoration implementation and management
 - Breach of landfill cover system
 - Development in a floodway
 - Development of and assigning responsibility for best management practices and mitigation measures
 - Disturbance, alteration, or removal of aquatic and terrestrial habitat

- Disturbance of archaeological sites
- Disruption of habitat connectivity and ongoing restoration projects in the Mississippi River
- Disturbance of munitions and munitions constituents
- Dredged material characterization, management, and disposal
- Dredging impact on streams and wetlands
- Encroachment on areas outside the boundary of LRA Parcel 20 (Apple River, Apple River Island, Brickhouse Slough, Mississippi River, and UMRNWFR); in particular, federal lands and waters in the UMRNWFR and Mississippi River
- Impact on navigation channel and river training structures (e.g., wing dams)
- Increase in commercial traffic on the Mississippi River
- Increase in noise and traffic (river and road) on nearby residences
- Investigation and remediation of PFAS
- Job development
- Land use compatibility with the existing natural and recreational land use
- Maintenance of LUCs
- Permits or permissions required under Section 10 of the River and Harbors Act, Section 401 of the Clean Water Act, Section 404 of the Clean Water Act, and Section 408 of the River and Harbors Act
- Sediment transport
- Take of a listed threatened or endangered species
- Violation of federal laws (e.g., Endangered Species Act or National Wildlife Refuge System Improvement Act of 1997)
- Administrative and Procedural Concerns
 - Request for additional details in the LRA Reuse Plan
 - Request for avian, botanical, fish, herpetological, and mussel surveys
 - Request for a dredging plan
 - Request for multidimensional hydraulic modeling
 - Request for sediment sampling
 - Request for solar PV array anchoring system description
 - Request for a timber management plan

4.0 CONCLUSION

The public scoping process for the SVADA LRA Parcel 20 EIS gathered a range of perspectives on and concerns about the Proposed Action and alternatives. Most of the federal and state agencies and all of the tribes that responded were neutral on Alternative 2, Accelerated Disposal; Alternative 3, Recreation Only Reuse; and Alternative 4, Recreation and Solar Reuse. Almost all the feedback was about Alternative 5, LRA Reuse Alternative. Most of the federal and state agencies and all the tribes that responded were neutral on the LRA Reuse Alternative; however, USFWS UMRNWFR Savanna District Office opposes the LRA Reuse Alternative because of concerns centered on potential adverse impacts on the UMRNWFR. Local government and citizens were divided, with those in support highlighting the economic benefit of the LRA's proposed port, and those in opposition having opposition to the port because of potential cultural, environmental, and navigation impacts. Other common concerns were impacts on the navigation channel and navigation features needed to gain access to LRA Parcel 20 from the Mississippi River, the effects of dredging on protected species, and the effects of dredging on water quality. Cultural concerns were raised about Environmentally Sensitive Area Site 13-E-4 along the Brickhouse Slough shoreline, which has archaeological resources, as well as other archaeological sites on or near LRA Parcel 20 that would be impacted by the LRA's proposed port. Support for the LRA Reuse Alternative emphasized its potential to provide a new industry and jobs to a region that has been struggling since SVADA closed.

Key topics identified for further analysis in the EIS include biological resources, cultural resources, hazardous materials management, land use, navigation, and water resources.

Moving forward, the Army remains committed to a transparent and inclusive process, ensuring that all stakeholder concerns are carefully considered in the development of the EIS.

5.0 REFERENCES

- AMC (U.S. Army Materiel Command). 2000. *Programmatic Agreement among United States Army, Illinois State Historic Preservation Officer, and Advisory Council on Historic Preservation for the Closure and Disposal of Savanna Army Depot Activity, Illinois*. U.S. Army Materiel Command, Redstone Arsenal, AL.
- Gajjar, Hardik, Environmental Specialist, WSP USA, Inc. 2023a, November 2. Personal communication at the SVADA LRA Parcel 20 Site Visit Kickoff Meeting.
- Gajjar, Hardik, Environmental Specialist, WSP USA, Inc. 2023b, November 2. Personal communication via email on proposed development square footage, paved area, and building footprints.
- Gajjar, Hardik, Environmental Specialist, WSP USA, Inc. 2023c, December 19. Personal communication via email on wharf access road versus walkway.
- JCD LRA (Jo-Carroll Depot Local Redevelopment Authority). 2023. *Jo-Carroll Depot Local Redevelopment Authority Final Reuse Plan for Parcel 20 Former Savanna Army Depot*. Accessed September 2023. <https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-1689879402.pdf>.
- Roche, Mara, Director, Jo-Carroll Depot Local Redevelopment Authority. 2025, March 18. Personal communication via email with response to Tetra Tech's request for information on the proposed LRA Reuse Alternative development facilities.
- USACE (U.S. Army Corps of Engineers), Mobile District. 1997. *Environmental Impact Statement for BRAC 95 Disposal and Reuse of the Savanna Army Depot Activity, Savanna, Illinois*. U.S. Army Corps of Engineers, Mobile District, Mobile, AL.

APPENDIX A
FEDERAL REGISTER NOTICE OF INTENT

SUPPLEMENTARY INFORMATION: This notice is published pursuant to 41 U.S.C. 8503 (a)(2) and 41 CFR 51–2.3. Its purpose is to provide interested persons an opportunity to submit comments on the proposed actions.

Additions

In accordance with 41 CFR 51–5.3(b), the Committee intends to add this services requirement to the Procurement List as a mandatory purchase only for the contracting activity listed at the location listed with the proposed qualified nonprofit agency as the authorized source of supply. Prior to adding the service to the Procurement List, the Committee will consider other pertinent information, including information from Government personnel and relevant comments from interested parties regarding the Committee's intent to geographically limit this services requirement.

The following service(s) are proposed for addition to the Procurement List for production by the nonprofit agencies listed:

Service(s)

Service Type: Custodial, Janitorial

Mandatory for: US Army, Walter Reed Army Institute of Research, Buildings 503 and 164, Silver Springs, MD

Authorized Source of Supply: MVLE, Inc., Springfield, VA

Contracting Activity: DEPT OF THE ARMY, W4PZ USA MED RSCH ACQUIS ACT

Deletions

The following product(s) and service(s) are proposed for deletion from the Procurement List:

Product(s)

NSN(s)—Product Name(s):

4330–01–121–6350—Parts Kit, Automatic Transmission Filter

Contracting Activity: DLA LAND AND MARITIME, COLUMBUS, OH

Service(s)

Service Type: Switchboard Operation

Mandatory for: Department of Veterans Affairs, VA Central Iowa Health Care System, 3600 30th Street, Des Moines, IA

Contracting Activity: Veterans Affairs, Department Of, 438-Sioux Falls Va Medical Center

Ramon Barreto,

Business Management Specialist, Business Operations.

[FR Doc. 2024–30421 Filed 12–19–24; 8:45 am]

BILLING CODE 6353–01–P

DEPARTMENT OF DEFENSE

Department of the Air Force

Notice of Record of Decision for the Environmental Impact Statement T–7A Recapitalization at Laughlin AFB, TX

AGENCY: Department of the Air Force, Department of Defense.

ACTION: Notice of availability of Record of Decision.

SUMMARY: On December 6, 2024, the Department of the Air Force (DAF) signed the Record of Decision (ROD) for the T–7A Recapitalization at Laughlin AFB, TX, Environmental Impact Statement.

ADDRESSES: Ms. Chinling Chen (AFCEC/CIE), Headquarters AETC Public Affairs; 100 H East Street, Suite 4; Randolph AFB, TX 78150. (210) 395–0979; chinling.chen@us.af.mil.

SUPPLEMENTARY INFORMATION: The DAF has decided to replace all T–38C aircraft at Laughlin AFB with up to 79 T–7A aircraft, and continue flying training programs at Laughlin AFB, TX. Initial delivery will be limited to 51 aircraft per the Secretary of the Air Force Strategic Basing Decision.

The DAF decision documented in the ROD was based on matters discussed in the Final Environmental Impact Statement, inputs from the public and regulatory agencies, and other relevant factors. The Final Environmental Impact Statement was made available to the public on June 21, 2024, through a Notice of Availability in the **Federal Register** (Volume 89, Number 120, Page 52040) with a waiting period that ended on July 22, 2024.

Authority: This Notice of Availability is published pursuant to the regulations (40 CFR part 1506.6) implementing the provisions of the National Environmental Policy Act (42 U.S.C. 4321, *et seq.*) and the Air Force's Environmental Impact Analysis Process (32 CFR parts 989.21(b) and 989.24(b)(7)).

Tommy W. Lee,

Acting Air Force Federal Register Liaison Officer.

[FR Doc. 2024–30356 Filed 12–19–24; 8:45 am]

BILLING CODE 3911–44–P

DEPARTMENT OF DEFENSE

Department of the Army

Notice of Intent To Prepare an Environmental Impact Statement for Disposal and Reuse of Parcel 20 at Savanna Army Depot Activity, Illinois

AGENCY: Department of the Army, DoD.

ACTION: Notice of intent.

SUMMARY: The Department of the Army (Army) is issuing this Notice of Intent (NOI) to prepare an Environmental Impact Statement (EIS) to assess the potential environmental and socioeconomic effects associated with the disposal and reuse of an approximately 132-acre land parcel at the Savanna Army Depot Activity (SVADA), Illinois. Under the proposed action, the Army would dispose of the parcel, known as Local Redevelopment Authority (LRA) Parcel 20, and transfer it to the Jo-Carroll Depot LRA or other recipients for their reuse. The EIS will analyze the potential direct effects of the Army conveying LRA Parcel 20 and the potential indirect effects of reuse of the parcel.

DATES: A 30-day public scoping period will start on the date of this NOI's publication in the **Federal Register**. Through the scoping process, the Army is inviting input regarding alternatives, effects, information, studies, and analyses with respect to the proposed action. The Army will be conducting analysis and consultation to comply with applicable laws and regulations and is soliciting comments and concerns regarding the effects of the proposed action. Comments will be accepted any time during the EIS process; however, to ensure the Army has sufficient time to consider public scoping comments during the preparation of the Draft EIS, please submit comments within the 30-day scoping period.

The Notice of Availability (NOA) of the Draft EIS is anticipated to be published in late 2025, and the NOA of the Final EIS is anticipated to be published in spring 2026. A decision can be announced no earlier than 30 days after publication of the NOA of the Final EIS. The Army invites the public, stakeholders, and other interested parties to attend a scoping meeting on Thursday, January 16, 2025, from 5:00 p.m. to 6:30 p.m. at West Carroll High School, 500 Cragmoor Street, Savanna, Illinois. The open-house style meeting will provide an opportunity for attendees to learn more about the proposed action and the scope of the EIS. Project team members will be

available to answer questions and exhibits will be on view throughout the meeting. Attendees also will have an opportunity to provide oral comments during the scoping meeting. Written comments are encouraged and can be submitted at any time.

ADDRESSES: Comments can be submitted by email to SVADAEIS@tetratech.com or by regular mail to SVADA EIS c/o Tetra Tech, 107 St. Francis Street, Suite 2370, Mobile, AL 36602. SVADA EIS documentation is available online at www.lrd.usace.army.mil/Submit-ArticleCS/Programs/Article/3901394/.

FOR FURTHER INFORMATION CONTACT: For other SVADA inquiries or for assistance under the Americans with Disabilities Act, please email Mr. Thomas Lineer, Public Affairs, at thomas.a.lineer.civ@army.mil. For other EIS inquiries, please contact Mr. Joe Hand by phone at 251-694-3881 or by email at joseph.h.hand@usace.army.mil.

SUPPLEMENTARY INFORMATION: The U.S. Department of Defense 1995 Base Realignment and Closure (BRAC) Commission made recommendations for realignment and closure of military installations in accordance with the Defense Base Closure and Realignment Act of 1990 (Pub. L. 101-510, as amended). The recommendations included closure of SVADA, located in northwestern Illinois along the Mississippi River in Jo Daviess and Carroll Counties. The Army officially closed SVADA in 2000. Following closure, the Army proposed disposal of SVADA's 13,061 acres because the property was excess to the Army's needs. Approximately 5,343.9 acres have been transferred as of the date of this notice. The proposed action is the transfer of LRA Parcel 20's 132 acres. The need for this action is to carry out the BRAC recommendation for the closure of SVADA, which became law, and to make the parcel available for reuse.

Through the BRAC process, as SVADA property parcels were certified as clean from environmental contaminants, the Army transferred the property to federal, state, or local agencies. The agencies that have taken ownership of SVADA parcels are the U.S. Fish and Wildlife Service (USFWS), the U.S. Army Corps of Engineers, the Illinois Department of Natural Resources, and the LRA.

In the original reuse plan, Parcel 20 was to go to the USFWS. In 2016, USFWS withdrew its interest in the parcel. The Army officially identified the parcel as surplus in January 2018. In 2023, the LRA submitted to the Army a Reuse Plan for Parcel 20. The EIS will

analyze the proposed action of disposal and transfer of Parcel 20, a no-action alternative, three LRA reuse alternatives, an alternative under which Parcel 20 would be available for recreation but would otherwise remain undeveloped, and an alternative under which Parcel 20 would be available for recreation and solar development. The no-action alternative is required by 40 CFR 1502.14(c) and serves as the baseline against which the proposed action and other alternatives are compared. The LRA presents in its 2023 Reuse Plan three conceptual reuse alternatives for developing LRA Parcel 20. The three alternatives focus on creating an inland commodity shipping facility, including commercial, industrial, recreational, and potentially solar development under each alternative. To facilitate implementation, the LRA designed the reuse alternatives as sequential phases. The initial phase would be implemented within a five-year target completion window, while the second and third phases would follow, with both having five-year-plus completion windows. The LRA's proposed reuse includes activities outside the boundary of LRA Parcel 20 in the Apple River, the Brickhouse Slough, the Mississippi River, and along Apple Island. All three of the LRA's reuse alternatives would require dredging. The recreation-only use alternative would implement recreational elements on Parcel 20 such as a walking trail, a canoe and kayak ramp on Commander's Pond, and a recreational area. The recreation and solar alternative would include a walking trail and canoe and kayak ramp on the pond, with solar photovoltaic arrays instead of a recreation area.

The EIS will analyze a wide range of environmental resource areas and effects, including—but not limited to—land use, aesthetics and visual resources, air quality, noise, geology and soils, water resources, biological resources, cultural resources, socioeconomic, transportation, utilities, hazardous and toxic materials, and cumulative environmental effects. Effects on water, biological resources, and cultural resources could be significant, and a Clean Water Act wetlands permit may be required. Additional resources and conditions may be identified as a result of the scoping process initiated by this NOI.

Interested local, state, and federal officials and agencies, federally recognized Tribes, and the public will be invited to participate in the 30-day scoping process, which includes a scoping meeting. The Army is seeking comments on alternatives and effects, as

well as relevant information, studies, or analyses with respect to the proposed action. Opportunities for public participation will be announced in the local news media and on the project website at www.lrd.usace.army.mil/Submit-ArticleCS/Programs/Article/3901394/. Comments from the public will be considered before completion of a Draft EIS. Following completion of a Draft EIS, the public will have an additional opportunity for review and comment. The Final EIS will make appropriate changes based on public comments and its release will start a 30-day waiting period. After that time, the Army will sign a Record of Decision (ROD) announcing the chosen alternative.

Scoping and Agency Coordination: Consultation will include, but not necessarily be limited to, consultation under Section 7 of the Endangered Species Act and Section 106 of the National Historic Preservation Act. This includes consultation with federally recognized Tribes. The Army will determine the scope of the analysis by soliciting comments from interested local, state, and federal officials and agencies, federally recognized Tribes, and members of the public.

CEQ Unique Identifier: EISX-007-21-000-1729699335.

James W. Satterwhite, Jr.,

U.S. Army Federal Register Liaison Officer.

[FR Doc. 2024-30383 Filed 12-19-24; 8:45 am]

BILLING CODE 3710-08-P

DEPARTMENT OF DEFENSE

Department of the Army

Draft Environmental Impact Statement for Real Property Master Plan Implementation at Military Ocean Terminal Sunny Point, North Carolina
AGENCY: Department of the Army, DoD.

ACTION: Notice of availability.

SUMMARY: The Department of the Army (Army) announces the availability of the Draft Environmental Impact Statement (DEIS) for implementing proposed real property actions at Military Ocean Terminal Sunny Point (MOTSU), North Carolina. This DEIS evaluates the potential effects of the implementation of various projects needed for the safety and mission of the facility and provides an analysis of the effects of implementing real property maintenance, repair, upgrade, and development actions. The proposed action is needed to address improvements to real property related to

APPENDIX B
NEWSPAPER PUBLIC NOTICE

STATE OF ILLINOIS,)
) ss.
County of Carroll,)

THE
MIRROR-DEMOCRAT COMPANY

Publishers of

**Notice of Intent to Prepare an
Environmental Impact Statement for
Base Realignment and Closure
Savanna Army Depot Activity**

CEQ Unique Identifier: EISX-007-21-000-1729699335

The Department of the Army (Army) will prepare an Environmental Impact Statement (EIS) to assess the potential environmental and socioeconomic effects associated with the proposed disposal and reuse of an approximately 132-acre land parcel at the Savanna Army Depot Activity (SVADA), Illinois (the Proposed Action). The U.S. Department of Defense 1995 Base Realignment and Closure (BRAC) Commission made recommendations for realignment and closure actions for military installations in conformance with the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510, as amended). The recommendations included closure of SVADA, located in northwestern Illinois along the Mississippi River in Jo Daviess and Carroll counties. The Army officially closed SVADA in 2000. Following closure, the Army proposed disposal of SVADA's 13,061 acres because the property was excess to the Army's needs. The Army would dispose of the parcel, known as Local Redevelopment Authority (LRA) Parcel 20, by transferring it to the Jo-Carroll Depot LRA or other appropriate recipients for their reuse. The EIS will analyze the potential direct effects of the Army conveying LRA Parcel 20 and the potential indirect effects of reuse of the parcel.

Public Comment

The Department of Army invites interested local, state, and federally elected officials and agencies, federally recognized Tribes, and the public to review scoping materials online at <https://www.lrd.usace.army.mil/Submit-ArticleCS/Programs/Article/3901394/>, and submit comments by email to SVADAEIS@tetratech.com, or by U.S. mail to SVADA EIS c/o Tetra Tech, 107 St. Francis Street, Suite 2370, Mobile, AL 36602. Comments will be accepted at any time during the environmental impact analysis process; however, to ensure the Army has sufficient time to consider public input during preparation of the Draft EIS, **please submit comments by February 15, 2025**. You are also invited to participate in a public scoping meeting where oral and written comments on the proposed action will be received **Thursday, January 16, 2025, 5:00 p.m. to 6:30 p.m. at the West Carroll High School, 500 Cragmoor Street, Savanna, IL 61074.**

Savanna Times-Journal

I, Robert W. Watson

do hereby certify that I am one of the Editors-Publishers of the Savanna Times-Journal, a weekly secular, public newspaper published in the City of Savanna, County of Carroll and State of Illinois; that said newspaper has been regularly published for more than six successive months prior to the first insertion of the annexed advertisement or notice, and that the advertisement or notice hereof annexed relating to the matter of

SVADA Notice of Intent to
Prepare an Environmental
Impact Statement for

Base Realignment & Closure

has been published in said paper for 1
consecutive weeks, the first insertion being

19 Dec, 2024
and the last insertion being

_____, 20____
which are the dates of the first and last papers
containing the same.

Given under my hand this 20

day of Dec., 2024

Robert W. Watson
Editor-Publisher

Printer's Fee \$ 240-

Received Of _____

\$ 240 - being the amount
in full of our fees for publishing the annexed notice.
Savanna, IL, 07 Jan 2025

Tom Villalobos

Notice for the Savanna Army Depot

Dec 20, 2024

**Notice of Intent to Prepare an
Environmental Impact Statement for
Base Realignment and Closure
Savanna Army Depot Activity
CEQ Unique Identifier: EISX-007-21-000-1729699335**

The Department of the Army (Army) will prepare an Environmental Impact Statement (EIS) to assess the potential environmental and socioeconomic effects associated with the proposed disposal and reuse of an approximately 132-acre land parcel at the Savanna Army Depot Activity (SVADA), Illinois (the Proposed Action). The U.S. Department of Defense 1995 Base Realignment and Closure (BRAC) Commission made recommendations for realignment and closure actions for military installations in conformance with the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510, as amended). The recommendations included closure of SVADA, located in northwestern Illinois along the Mississippi River in Jo Daviess and Carroll counties. The Army officially closed SVADA in 2000. Following closure, the Army proposed disposal of SVADA's 13,061 acres because the property was excess to the Army's needs. The Army would dispose of the parcel, known as Local Redevelopment Authority (LRA) Parcel 20, by transferring it to the Jo-Carroll Depot LRA or other appropriate recipients for their reuse. The EIS will analyze the potential direct effects of the Army conveying LRA Parcel 20 and the potential indirect effects of reuse of the parcel.

Public Comment

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APPENDIX C

PUBLIC STAKEHOLDER DISTRIBUTION LIST

SVADA LRA Parcel 20 EIS						
Public Stakeholder Mailing List						
Salutation	First Name	Last Name	Role/Title	Agency/Organization Name	City	State
The Honorable	Richard	Durbin	U.S. Senator	United States Senate	Washington	DC
The Honorable	Richard	Durbin	U.S. Senator	United States Senate	Springfield	IL
The Honorable	Richard	Durbin	U.S. Senator	United States Senate	Chicago	IL
The Honorable	Tammy	Duckworth	U.S. Senator	United States Senate	Washington	DC
The Honorable	Tammy	Duckworth	U.S. Senator	United States Senate	Springfield	IL
The Honorable	Tammy	Duckworth	U.S. Senator	United States Senate	Chicago	IL
The Honorable	Eric	Sorensen	U.S. House Representative, Illinois 17th Congressional District	United States House of Representatives	Washington	DC
The Honorable	Eric	Sorensen	U.S. House Representative, Illinois 17th Congressional District	United States House of Representatives	Rock Island	IL
The Honorable	Darin	LaHood	U.S. House Representative, Illinois 16th Congressional District	United States House of Representatives	Washington	DC
The Honorable	Darin	LaHood	U.S. House Representative, Illinois 16th Congressional District	United States House of Representatives	Peoria	IL
The Honorable	J.B.	Pritzker	Governor	Office of the Governor, State of Illinois	Springfield	IL
The Honorable	J.B.	Pritzker	Governor	Office of the Governor, State of Illinois	Chicago	IL
The Honorable	Juliana	Stratton	Lt. Governor	Office of the Lieutenant Governor, State of Illinois	Springfield	IL
The Honorable	Juliana	Stratton	Lt. Governor	Office of the Lieutenant Governor, State of Illinois	Chicago	IL
The Honorable	Tony	McCombie	State Representative, House District 89	Illinois State House of Representatives	Springfield	IL
The Honorable	Tony	McCombie	State Representative, House District 89	Illinois State House of Representatives	Savanna	IL
The Honorable	Andrew	Chesney	State Senator, Senate District 45	Illinois State Senate	Springfield	IL
The Honorable	Andrew	Chesney	State Senator, Senate District 45	Illinois State Senate	Freeport	IL
Ms.	Suzanne	Kruse	Acting County Executive Director	USDA Jo Daviess County Farm Service Agency	Elizabeth	IL
Mr.	Kraig	McPeck	Field Office Supervisor	USFWS, Illinois-Iowa Ecological Services Field Office	Moline	IL
Mr.	Ed	Britton	District Manager	USFWS, Upper Mississippi River National Wildlife and Fish Refuge, Savanna District Office	Thomson	IL
Ms.	Jodi	Creswell	Chief, Environmental Planning Branch	USACE, Rock Island District	Rock Island	IL
Ms.	Krystle	McClain	NEPA Program Supervisor	US EPA Region 5	Chicago	IL
Ms.	Kathy	Kowal	Lead NEPA Reviewer	US EPA Region 5	Chicago	IL
Ms.	Nicole	Goers	Remedial Project Manager, Remedial Response Section 5	U.S. EPA Region 5, Superfund & Emergency Management Division	Chicago	IL
Mr.	Travis	Black	Director, Inland Waterways Gateway (St. Louis)	US DOT Maritime Administration (MARAD)	St. Louis	MO
Mr.	Travis	Black	Director, Inland Waterways Gateway (St. Louis)	US DOT Maritime Administration (MARAD)	Washington	DC
Mr.	Christopher	Koeppel	Assistant Director, Office of Federal Agency Programs	Advisory Council on Historic Preservation	Washington	D.C.
Ms.	Tammy	Willis	State Conservationist	NRCS Illinois State Office	Champaign	IL
Mr.	Paul	Searl	District Conservationist	NRCS Mt. Carroll Service Center	Mt. Carroll	IL
Mr.	Kent	Collier	NAGPRA	Kickapoo Tribe of Oklahoma	McCloud	OK
Ms.	Susan	Tiger	NAGPRA Representative	Kickapoo Tribe of Oklahoma	McCloud	OK
Mr.	Darwin	Kaskaske	Chairman	Kickapoo Tribe of Oklahoma	McCloud	OK
Mr.	William	Quackenbush	Tribal Historic Preservation Officer	Ho-Chunk Nation of Wisconsin	Black River Falls	WI
Mr.	John	Greendeer	President	Ho-Chunk Nation of Wisconsin	Black River Falls	WI
Ms.	Melissa	Wiatrolik	Tribal Historic Preservation Officer	Little Traverse Bay Bands of Odawa Indians, Michigan	Harbor Springs	MI
Ms.	Regina	Gasco-Bentley	Chairperson	Little Traverse Bay Bands of Odawa Indians, Michigan	Harbor Springs	MI
Mr.	David	Grignon	Tribal Historic Preservation Officer	Menominee Indian Tribe of Wisconsin	Keshena	WI
Ms.	Gena	Kakkak	Chairwoman	Menominee Indian Tribe of Wisconsin	Keshena	WI
Mr.	Logan	York	Tribal Historic Preservation Officer	Miami Tribe of Oklahoma	Miami	OK
Mr.	Douglas	Lankford	Chief	Miami Tribe of Oklahoma	Miami	OK
Dr.	Andrea	Hunter	Director and THPO, Historic Preservation Office	The Osage Nation	Pawhuska	OK
Mr.	Geoffrey	Standing Bear	Principal Chief	The Osage Nation	Pawhuska	OK
Ms.	Tiauna	Carnes	Chairperson	Sac & Fox Nation of Missouri in Kansas and Nebraska	Reserve	KS
Ms.	Sandra	Massey	Tribal Historic Preservation Officer	Sac & Fox Nation, Oklahoma	Stroud	OK
Mr.	Randle	Carter	Principal Chief	Sac & Fox Nation, Oklahoma	Stroud	OK
Mr.	Vern	Jefferson	Chairman	Sac & Fox Tribe of the Mississippi in Iowa	Tama	IA
Mr.	Johnathon	Buffalo	Tribal Historic Preservation Officer	Sac & Fox Tribe of the Mississippi in Iowa	Tama	IA
Ms.	Sunshine	Thomas-Bear	Tribal Historic Preservation Officer	Winnebago Tribe of Nebraska	Winnebago	NE
Ms.	Victoria	Kitcheyan	Chairwoman	Winnebago Tribe of Nebraska	Winnebago	NE
Mr.	Sam	Al-Basha	Illinois State Hazard Mitigation Officer	Illinois Emergency Management Agency	Springfield	IL
Mr.	Zachary	Krug	Illinois State Hazard Mitigation Officer	Illinois Emergency Management Agency	Springfield	IL
Sir or Madam	Director		Director, DHS Family Community Center in Whiteside County	Illinois Department of Human Services	Sterling	IL
Ms.	Charlene	Falco	Project Manager, Federal Site Remediation Section, Bureau of Land	Illinois EPA (IEPA), Headquarters	Springfield	IL
Ms.	Natalie	Phelps Finnie	Director	Illinois DNR	Springfield	IL
Mr.	Bradley	Hayes	Manager, Impact Assessment Section	Illinois DNR, EcoCAT, Div. of Real Estate Services & Consultation, Office of Realty & Capital Planning	Springfield	IL

Ms.	CJ (Carol)	Wallace	Cultural Resources Coordinator	Illinois DNR, Attn: State Historic Preservation Office	Springfield	IL
Sir or Madam	Regional Manager		Regional Manager	Illinois DNR, Region 1 - Northwestern Illinois Office	Rock Island	IL
Ms.	Ann	Holtrop	Chief	Illinois DNR, Div. of Natural Heritage	Springfield	IL
Mr.	Duane	Ambroz	District Heritage Biologist	Illinois DNR, Div. of Natural Heritage, Lost Mound Unit	Savanna	IL
Mr.	Omer	Osman	Secretary of Transportation	Illinois DOT, Headquarters	Springfield	IL
Mr.	Masood	Ahmad	Region 2 Engineer	Illinois DOT, Region 2, District 2	Dixon	IL
Mr.	Mark	Maidak	Agency Coordinator	Jo Daviess-Carroll Counties Joint Action Solid Waste Agency	Mt. Carroll	IL
Mr.	Aaron	Mercier	Regional Superintendent	Regional Superintendent of Schools: Carroll, Jo Daviess, & Stephenson Counties	Freeport	IL
Ms.	Jill	Calkins	President/CEO	Tri-County Opportunities Council	Rock Falls	IL
Sir or Madam	Chair		Chair	Tri-County Economic Development Alliance	Elizabeth	IL
Sir or Madam	Director		Director	Northwestern Illinois Community Action Agency	Freeport	IL
Ms.	Cathy	Weightman-Moore	Diocesan Director of Catholic Charities	Catholic Charities Administration	Rockford	IL
Mr.	Robert	Jachnicki	Administrator	Carroll County Board	Mt. Carroll	IL
Mr.	Christopher	Flikkema	Board Member, District One	Carroll County Board	Lanark	IL
Ms.	Susan	Jacobs	Board Member, District One	Carroll County Board	Mt. Carroll	IL
Mr.	Dave	Soldat	Board Member, District One	Carroll County Board	Lanark	IL
Mr.	Ronald	Preston	Board Member, District Two	Carroll County Board	Savanna	IL
Mr.	James	Rieck	Board Member, District Two	Carroll County Board	Mt. Carroll	IL
Ms.	Julie	Bickelhaupt	Board Member, District Two	Carroll County Board	Mt. Carroll	IL
Mr.	Joseph	Payette	Chair, Board Member, District Three	Carroll County Board	Shannon	IL
Mr.	Keith	Vandermyde	Board Member, District Three	Carroll County Board	Lanark	IL
Mr.	William	Iske	Vice Chair, Board Member, District Three	Carroll County Board	Lanark	IL
Ms.	Sara	Renkes	County Engineer	Carroll County Highway Department	Mt. Carroll	IL
Sir or Madam	Chairman		Chairman	Carroll County Soil and Water Conservation District	Mt. Carroll	IL
Mr.	Jim	Klinefelter	Director	Carroll County Emergency Management Agency	Mt. Carroll	IL
Ms.	Kerry	Whipple	Administrator	Carroll County Health Department	Mt. Carroll	IL
Ms.	Peg	Haffey	Chairman	Carroll County Housing Authority	Savanna	IL
Mr.	Ryan	Kloepfing	Sheriff	Carroll County Sheriff's Office	Mt. Carroll	IL
Ms.	Alicia	Kness	Operations Manager	Carroll County Transit	Mt. Carroll	IL
Sir or Madam	Administrator		Zoning & Building Administrator	Carroll County Zoning & Building	Mt. Carroll	IL
Ms.	Victoria	Hansen	Manager	Carroll County Farm Bureau	Mt. Carroll	IL
Ms.	Deb	Connor	Executive Director	Carroll County Senior Services Organization	Mt. Carroll	IL
Sir or Madam	Director		Director	Carroll County Historical Society	Mt. Carroll	IL
Sir or Madam	Director		Director	Carroll County Sinissippi Centers, Inc.	Mt. Carroll	IL
Sir or Madam	Director		Director	Carroll County Rolling Hills Progress Center	Lanark	IL
Ms.	Danielle	Eberle	President	Carroll County Veterans Assistance Commission	Mt. Carroll	IL
Mr.	Tim	Schurman	Superintendent	Chadwick-Milledgeville School District #399, Carroll County	Milledgeville	IL
Mr.	Alex	Kashner	Superintendent	Eastland School District #308	Lanark	IL
Mr.	Brad	Aude	Chief	Chadwick Fire Department, Carroll County	Chadwick	IL
Mr.	Randy	Witt	Chief	Lanark Fire Department, Carroll County	Lanark	IL
Mr.	Jon	Caudillo	Chief	Milledgeville Fire Department, Carroll County	Milledgeville	IL
Mr.	Marty	Hockman	Chief	Mt. Carroll Fire Department, Carroll County	Mt. Carroll	IL
Mr.	Scott	Wolfe	Chief	Savanna Fire Department, Carroll County	Savanna	IL
Mr.	Jim	Klinefelter	Chief	Shannon Fire Department, Carroll County	Shannon	IL
Mr.	Tyler	Vandendooren	Chief	Thomson Fire Department, Carroll County	Thomson	IL
Dr.	David	Gilliland	Superintendent	West Carroll CUSD #314	Mt. Carroll	IL
Mr.	Scott	Toot	Administrator	Jo Daviess County Administrator's Office	Galena	IL
Mr.	LaDon	Trost	Chair, Board Member, District 17	Jo Daviess County Board	Stockton	IL
Mr.	John	Lang	Vice Chair, Board Member, District 3	Jo Daviess County Board	East Dubuque	IL
Ms.	Dianne	Allendorf	Board Member, District 12	Jo Daviess County Board	Galena	IL
Ms.	Daisha	Boehm	Board Member, District 5	Jo Daviess County Board	Galena	IL
Ms.	Tina	Brandel	Board Member, District 15	Jo Daviess County Board	Elizabeth	IL
Mr.	John	Creighton	Board Member, District 7	Jo Daviess County Board	Lena	IL
Mr.	Michael	Dittmar	Board Member, District 13	Jo Daviess County Board	Elizabeth	IL
Mr.	Steve	Endress	Board Member, District 6	Jo Daviess County Board	Apple River	IL
Ms.	Diane	Gallagher	Board Member, District 1	Jo Daviess County Board	East Dubuque	IL
Ms.	Lynn	Gallagher	Board Member, District 11	Jo Daviess County Board	Galena	IL
Mr.	John	Grizzoffi	Board Member, District 10	Jo Daviess County Board	Galena	IL
Mr.	Joseph	Heitkamp	Board Member, District 4	Jo Daviess County Board	East Dubuque	IL
Mr.	Robert	Heurman	Board Member, District 16	Jo Daviess County Board	Stockton	IL

Mr.	Michael	Holt	Board Member, District 8	Jo Daviess County Board	Apple River	IL
Mr.	John	Schultz	Board Member, District 9	Jo Daviess County Board	Galena	IL
Ms.	Darcy	Wild	Board Member, District 14	Jo Daviess County Board	Hanover	IL
Mr.	Don	Zillig	Board Member, District 2	Jo Daviess County Board	East Dubuque	IL
Ms.	Colleen	Farrell	President	Jo Daviess County 708 Mental Health Board	Galena	IL
Ms.	Merri	Berlage	President	Jo Daviess County Board of Health	Galena	IL
Ms.	Mary	Vincent	Chairperson	Jo Daviess County Housing Authority	Galena	IL
Mr.	Colin	Fulrath	Vice-Chairperson	Jo Daviess County Local Emergency Planning Committee	Galena	IL
Mr.	Peter	Huschitt	Chair	Jo Daviess County Planning Commission & Zoning	Hanover	IL
Mr.	Steve	Eden	Chairman	Jo Daviess County Soil and Water Conservation District	Elizabeth	IL
Sir or Madam	Director		Director	Jo Daviess County Veterans Assistance Program	Galena	IL
Mr.	Michael	Willis	Director	Jo Daviess County Emergency Management Agency	Hanover	IL
Ms.	Sandra	Schleicher	Public Health Administrator	Jo Daviess County Public Health Department	Galena	IL
Mr.	William	Meeker	Administrator	Jo Daviess County Planning & Development Dept.	Hanover	IL
Sir or Madam	Manager		Manager	Jo Daviess County Farm Bureau	Elizabeth	IL
Mr.	T.J.	Potts	Superintendent	Jo Daviess County East Dubuque CUSD #119	East Dubuque	IL
Mr.	Tim	Vincent	Superintendent	Jo Daviess County Galena CUSD #120	Galena	IL
Mr.	Shawn	Teske	Superintendent	Jo Daviess County Warren CUSD #205	Warren	IL
Mr.	James	Bunting	Superintendent	Jo Daviess County Stockton CUSD #206	Stockton	IL
Ms.	Colleen	Fox	Superintendent	Jo Daviess County River Ridge CUSD #210	Hanover	IL
Dr.	Marybeth	Whitney-DeLaMar	Superintendent	Jo Daviess County Scales Mound CUSD #211	Scales Mound	IL
Dr.	Michael	Schiffman	Superintendent	Jo Daviess County Pearl City CUSD #200	Pearl City	IL
Dr.	Thomas	Chiles	Superintendent	Jo Daviess County Lena-Winslow CUSD #202	Lena	IL
Mr.	Timothy	Toepfer	Chief	Apple River Fire Protection District, Jo Daviess County	Apple River	IL
Mr.	Cal	Cain	Chief	Dunleith-Menominee Fire Protection District, Jo Daviess County	East Dubuque	IL
Mr.	Joe	Heim	Chief	East Dubuque Fire Department, Jo Daviess County	East Dubuque	IL
Mr.	Andrew	Nolan	Chief	Elizabeth Community Fire Protection District, Jo Daviess County	Elizabeth	IL
Mr.	Bob	Conley	Chief	Galena Fire Department, Jo Daviess County	Galena	IL
Mr.	Jack	Henkins	Chief	Hanover Fire Protection District, Jo Daviess County	Hanover	IL
Mr.	Al	Busch	Chief	Scales Mound Fire Protection District, Jo Daviess County	Scales Mound	IL
Mr.	Bruce	Marcure	Chief	Stockton Fire Protection District, Jo Daviess County	Stockton	IL
Mr.	Jeff	Ege	Chief	Warren Fire Department, Jo Daviess County	Warren	IL
Mr.	Val	Gunnerson	Mayor	City of Savanna, Carroll County	Savanna	IL
Mr.	James	Friedenbach	Council Member Ward I	City of Savanna, Carroll County	Savanna	IL
Mr.	Eric	Dahlman	Council Member Ward I	City of Savanna, Carroll County	Savanna	IL
Mr.	Jacob	Griswold	Council Member Ward II	City of Savanna, Carroll County	Savanna	IL
Mr.	Jacob	Helms	Council Member Ward II	City of Savanna, Carroll County	Savanna	IL
Mr.	Nicholas	Law	Council Member Ward III	City of Savanna, Carroll County	Savanna	IL
Mr.	Patrick	Sanchez	Council Member Ward III	City of Savanna, Carroll County	Savanna	IL
Mr.	Tevan	Hartman	Council Member Ward IV	City of Savanna, Carroll County	Savanna	IL
Mr.	Scott	Wolfe	Fire Chief	City of Savanna, Carroll County	Savanna	IL
Mr.	Don	Stephens	Police Chief	City of Savanna, Carroll County	Savanna	IL
Mr.	Jeremy	Hughes	Public Works Superintendent/Zoning and Building	City of Savanna, Carroll County	Savanna	IL
Ms.	Kimberly	Hinrichs	President	Village of Chadwick, Carroll County	Chadwick	IL
Mr.	Ken	Viglietta	Mayor	City of Lanark, Carroll County	Lanark	IL
Mr.	Galen	Wirth	President	Village of Milledgeville, Carroll County	Milledgeville	IL
Mr.	Carl	Bates	Mayor	City of Mt. Carroll, Carroll County	Mt. Carroll	IL
Ms.	Bonnie	Foust	President	Village of Shannon, Carroll County	Shannon	IL
Mr.	Tyler	Vandendooren	President	Village of Thomson	Thomson	IL
Mr.	Darrell	Stitzel	Supervisor	Cherry Grove/Shannon Township, Carroll County	Shannon	IL
Ms.	Jennifer	Dettman	Supervisor	Elkhorn Grove Township, Carroll County	Milledgeville	IL
Ms.	Janice	Queckboerner	Supervisor	Fairhaven Township, Carroll County	Chadwick	IL
Mr.	Jeremy	Flikkema	Supervisor	Freedom Township, Carroll County	Mt. Carroll	IL
Ms.	Michelle	Moshure	Supervisor	Mt. Carroll Township, Carroll County	Mt. Carroll	IL
Mr.	Dan	Sweitzer	Supervisor	Rock Creek/Lima Township, Carroll County	Lanark	IL
Ms.	Ellen	Rahn	Supervisor	Salem Township, Carroll County	Mt. Carroll	IL
Ms.	Jo A.	Carey	Supervisor	Savanna Township, Carroll County	Savanna	IL
Ms.	Julie	Brigham	Supervisor	Washington Township, Carroll County	Savanna	IL
Ms.	Dawn	Rath	Supervisor	Woodland Township, Carroll County	Savanna	IL
Mr.	Dean	Hollewell	Supervisor	Wysox Township, Carroll County	Milledgeville	IL
Mr.	Edwin	Balk	Supervisor	York Township, Carroll County	Thomson	IL

Mr.	Pat	Stiefel	Mayor	Village of Apple River, Jo Daviess County	Apple River	IL
Mr.	John	Digman	Mayor	East Dubuque, Jo Daviess County	East Dubuque	IL
Mr.	Michael	Dittmar	President	Village of Elizabeth, Jo Daviess County	Elizabeth	IL
Mr.	Terry	Renner	Mayor	City of Galena, Jo Daviess County	Galena	IL
Mr.	Donald	Schaible	Mayor	Village of Hanover, Jo Daviess County	Hanover	IL
Mr.	Clifford	Splinter	Mayor	Village of Menominee, Jo Daviess County	East Dubuque	IL
Mr.	Mark	Mullen	Mayor	Village of Nora, Jo Daviess County	Nora	IL
Ms.	Carrie	Stier	President	Village of Scales Mound, Jo Daviess County	Scales Mound	IL
Mr.	Dan	Kunz	Acting President	Village of Stockton, Jo Daviess County	Stockton	IL
Mr.	Kirk	Raab	President	Village of Warren, Jo Daviess County	Warren	IL
Mr.	Thomas	Janecke	Supervisor	Apple River Township, Jo Daviess County	Apple River	IL
Mr.	Daniel	Caswell	Supervisor	Berremans Township, Jo Daviess County	Stockton	IL
Ms.	Brittni	Busch	Supervisor	Council Hill Township, Jo Daviess County	Scales Mound	IL
Mr.	Daniel	Schreiber	Supervisor	Derinda Township, Jo Daviess County	Elizabeth	IL
Ms.	Sharon	Rigdon	Supervisor	East Galena Township, Jo Daviess County	Galena	IL
Ms.	Judith	Vesley	Supervisor	Elizabeth Township, Jo Daviess County	Hanover	IL
Mr.	Francis	Wachter	Supervisor	Guilford Township, Jo Daviess County	Elizabeth	IL
Mr.	John	Francke	Supervisor	Hanover Township, Jo Daviess County	Hanover	IL
Mr.	Paul	Middendorf	Supervisor	Menominee Township, Jo Daviess County	East Dubuque	IL
Mr.	Steve	Wulfekuhle	Supervisor	Nora Township, Jo Daviess County	Winslow	IL
Mr.	Terry	Haas	Supervisor	Pleasant Valley Township, Jo Daviess County	Elizabeth	IL
Ms.	Sharon	Hansen	Supervisor	Rawlins Township, Jo Daviess County	Galena	IL
Mr.	Andy	Berlage	Supervisor	Rice Township, Jo Daviess County	Galena	IL
Mr.	Garrett	Toay	Supervisor	Rush Township, Jo Daviess County	Stockton	IL
Mr.	Steve	Stadel	Supervisor	Scales Mound Township, Jo Daviess County	Scales Mound	IL
Mr.	Gary	Townsend	Supervisor	Stockton Township, Jo Daviess County	Stockton	IL
Mr.	John	Diehl	Supervisor	Thompson Township, Jo Daviess County	Apple River	IL
Mr.	Alan	Minter	Supervisor	Vinegar Hill Township, Jo Daviess County	Galena	IL
Ms.	Donna	Luning	Supervisor	Wards Grove Township, Jo Daviess County	Stockton	IL
Ms.	Laura	Busch	Supervisor	Warren Township, Jo Daviess County	Warren	IL
Mr.	Charles	Quick	Supervisor	West Galena Township, Jo Daviess County	Galena	IL
Mr.	Richard	Dittmar	Supervisor	Woodbine Township, Jo Daviess County	Elizabeth	IL
Ms.	Mara	Roche	Executive Director	Jo-Carroll Depot Local Redevelopment Authority	Savanna	IL
Mr.	Rob	Davies	Deputy Director	Jo-Carroll Depot Local Redevelopment Authority	Savanna	IL
Ms.	Linda	Balcom	President	Balcom Environmental Services	Colorado Springs	CO
Mr.	Ed	Juracek	President	Blackhawk Hills Regional Council	Rock Falls	IL
Mr.	David	Schmit	Regional Director	Northwest Illinois Economic Development	Hanover	IL
Mr.	Joel	Torbeck	Program Manager	BEST, Inc.	Oglesby	IL
Captains	Tim & Lisa	Thorson	Corps Officers	The Salvation Army	Freeport	IL
Ms.	Chandra	Ravada	Interim Executive Director	East Central Intergovernmental Association	Dubuque	IA
Sir or Madam	Director		Director	Sojourn House	Galena	IL
Sir or Madam	Director		Director	HOPE Foundation of Jo Daviess County	Galena	IL
Sir or Madam	Director		Director	American Red Cross	Freeport	IL
Sir or Madam	Director		Director	United Way	Dixon	IL
Sir or Madam	Director		Director	Savanna Food Pantry	Savanna	IL
Sir or Madam	Director		Director	Freeport Area Church Co-op	Freeport	IL
Mr.	Steve	Keeffer	Chair	Savanna Industrial Park Board of Directors	Hanover	IL
Mr.	Don	Crawford	Vice Chair	Savanna Industrial Park Board of Directors	Hanover	IL
Mr.	Paul	Hartman	Director	Savanna Industrial Park Board of Directors	Savanna	IL
Mr.	William	McFadden	Director	Savanna Industrial Park Board of Directors	Apple River	IL
Mr.	Kevin	Reibel	Director	Savanna Industrial Park Board of Directors	Savanna	IL
Mr.	Bill	Robinson	Director	Savanna Industrial Park Board of Directors	Savanna	IL
Mr.	Ron	Smith	Director	Savanna Industrial Park Board of Directors	Galena	IL
Mr.	William	Wright	Director	Savanna Industrial Park Board of Directors	Savanna	IL
Sir or Madam	Manager		Manager	Rescar	Savanna	IL
Mr.	Joe	Schieszler	CEO	Rescar	Downers Grove	IL
Mr.	Shawn	Faust	Manager	TLC Rail Services/Inserv	Savanna	IL
Mr.	Dan	Wilson	Owner	INSERV, Inc./TLC Rail Services	Mishawaka	IN
Mr.	Edward	Martin	Manager	Midwest 3PL	Savanna	IL
Ms.	Aimee	Martelle	Manager	Riverport Railroad, LLC	Savanna	IL
Mr.	Michael	Smythers	VP, Federal Government Affairs	BNSF Railway	Washington	DC

Mr.	Dan	Holcomb	President	Bison Aerospace and Defense LLC	Savanna	IL
Mr.	Darren	Johnson	Owner	Johnson Logging	Savanna	IL
Mr.	Roger	Coulthard	President	Eastland Feed & Grain	Shannon	IL
Mr.	Steve	Hugh	Owner	Illinois International Trade Centers	Savanna	IL
Mr.	James	Jeanblanc	Owner	JDC Warehousing/Jeanblanc Intl/GAT Intl, Inc.	Savanna	IL
Mr.	Brian	Potempa	Owner		Savanna	IL
Mr.	Brian	Potempa	Owner		Freeport	IL
Mr.	Brian	Potempa	President	Twin Image Design	Freeport	IL
Mr.	Michael or Brian	Potempa	Owner	Ka-Ching Global Sourcing Inc.	Savanna	IL
Mr.	Michael or Brian	Potempa	Owner of Ka-Ching Global Sourcing, Inc.	Chicago Title Land and Trust Co.	Chicago	IL
Mr.	Rick	Stickle	Owner	Hawkeye Land	Cedar Rapids	IA
Mr.	Darren	Johnson	Owner	Greyson Properties LLC	Savanna	IL
Mr.	Darren	Johnson	Owner	Greyson Properties LLC	Bellevue	IA
Mr.	Joe and Robert	Deckert	Owners	Depot RV Park	East Dubuque	IL
Ms.	Tracy	Bauer	Chief Executive Officer	Midwest Medical Center	Galena	IL
Sir or Madam	Manager		Manager	Palisades Golf Course/TCWC Inc.	Savanna	IL
Sir or Madam	Manager		Manager	BlackHawk Motel	Savanna	IL
Mr.	Steven	Artiszewski	Homeowner		Savanna	IL
Mr.	Steven	Artiszewski	Homeowner		Woodburn	OR
Mr. and Ms.	James and Judith	Bailey	Homeowner		Savanna	IL
Mr. and Ms.	Herman and Mary Pat	Bowman	Homeowner		Savanna	IL
Mr. and Ms.	Herman and Mary Pat	Bowman	Homeowner		Merritt Island	FL
Mr.	Herman	Bowman	Homeowner		Savanna	IL
Ms.	Betty	Bowman	Homeowner		Savanna	IL
Mr. and Ms.	John and Julie	Bowman	Homeowner		Savanna	IL
Ms.	Torie	Dreyer	Homeowner		Savanna	IL
Ms.	Torie	Dreyer	Homeowner	Blackhawk Area Credit Union	Savanna	IL
Mr.	Steve	Dubrovich	Homeowner		Savanna	IL
Mr. and Ms.	Christopher and Kimberly	Falk	Homeowner		Savanna	IL
Mr. and Ms.	Christopher and Kimberly	Falk	Homeowner		Savanna	IL
Mr.	Ronald	Farrey	Homeowner		Savanna	IL
Mr.	Stanley	Fosdick	Homeowner		Savanna	IL
Mr.	Jack	Funk	Homeowner		Savanna	IL
Mr.	John	Gascoigne	Homeowner		Savanna	IL
Mr. and Ms.	Richard and Cindy	Groom	Homeowner		Savanna	IL
Mr. and Ms.	Richard and Cindy	Groom	Homeowner		Montgomery	IL
Mr.	Roy	Hubbard	Homeowner		Savanna	IL
Mr.	Christopher	Lawson	Homeowner		Savanna	IL
Mr.	Christopher	Lawson	Homeowner		Mount Carroll	IL
Mr. and Ms.	Thomas and Priscilla	Lundy	Landowners		Savanna	IL
Mr. and Ms.	Thomas and Priscilla	Lundy	Landowners		Savanna	IL
Mr. and Ms.	Thomas and Priscilla	Lundy	Landowners		Savanna	IL
Mr.	Donald	Major	Homeowner		Savanna	IL
Mr.	Wayne	McIntyre	Homeowner		Savanna	IL
Mr.	Wayne	McIntyre	Homeowner		Galena	IL
Mr.	Jesse	McIntyre	Landowner		Savanna	IL
Mr.	Jesse	McIntyre	Landowner		Lakewood Ranch	FL
Mr. and Ms.	Jeffrey and Susan	McIntyre	Homeowner		Savanna	IL
Mr.	Larry	Messmer	Homeowner		Savanna	IL
Mr.	Brian	Mokry	Landowner		Savanna	IL
Mr.	Brian	Mokry	Landowner		Savanna	IL
Mr.	Brian	Mokry	Landowner		Winfield	IL
Mr. and Ms.	Sharon and Stanley	Niezgodzki	Homeowner		Savanna	IL
Ms.	Tia	Pearl	Homeowner		Savanna	IL
Mr. and Ms.	Frederick and Erica	Schau	Homeowner		Savanna	IL
Mr.	Donald	Shaw	Homeowner		Savanna	IL
Mr. and Ms.	Carl and Cheryl	Sweetman	Landowner	Sweetman Family Trust	Savanna	IL
Mr. and Ms.	Carl and Cheryl	Sweetman	Landowner	Sweetman Family Trust	Savanna	IL
Mr. and Ms.	Scott and Tonya	Wernet	Homeowner		Savanna	IL
Mr. and Ms.	Edmund and Lynette	Williams	Homeowner		Savanna	IL
Mr. and Ms.	Edmund and Lynette	Williams	Homeowner		Freeport	IL

Mr. and Ms.	Trent and Nicole	Yenney	Homeowner		Savanna	IL
Mr.	David	Zajakala	Homeowner		Savanna	IL
Mr.	David	Zajakala	Homeowner		Des Plaines	IL
Mr.	Albert	Khant	Homeowner		Naperville	IL
Mr.	Albert	Khant	Homeowner	A&B Holdings	Savanna	IL
Mr.	Jesse	Speer	Homeowner		Savanna	IL
Mr.	Jesse	Speer	Homeowner		Miles	IA
Mr.	Drew	Witte	Homeowner		Savanna	IL
Mr.	Art	Dersham	Resident		Savanna	IL
Sir or Madam	Landowner		Landowner	McIntyre Family Farm LLC	Savanna	IL
Sir or Madam	Landowner		Landowner	McIntyre Family Farm LLC	Savanna	IL
Sir or Madam	Landowner		Landowner	McIntyre Family Farm LLC	Savanna	IL
Sir or Madam	Landowner		Landowner	McIntyre Family Farm LLC	Savanna	IL
Sir or Madam	Landowner		Landowner	McIntyre Family Farm LLC	Savanna	IL
Sir or Madam	Landowner		Landowner	McIntyre Family Farm LLC	Savanna	IL
Ms.	Jean	Webster	Homeowner		Savanna	IL
Ms.	Kathleen	Sima	Homeowner		Savanna	IL
Ms.	Jean	Webster	Homeowner		Savanna	IL
Ms.	Kathleen	Sima	Homeowner		Savanna	IL
Sir or Madam	Homeowner		Homeowner		Savanna	IL
Sir or Madam	Homeowner		Homeowner		Savanna	IL
Ms.	Camille	Pettee	Homeowner		Savanna	IL
Ms.	Camille	Pettee	Homeowner		Wyoming	IA
Mr.	Keith	Merritt, DVM	Owner		Stockton	IL
Mr.	Mike	Casper	President & CEO	JCE Co-Op, Elizabeth Headquarters	Elizabeth	IL
Sir or Madam	Manager		Manager	JCE Co-Op, Savanna Office	Savanna	IL
Sir or Madam	President		President	Aero Group, Inc.	Freeport	IL

APPENDIX D
PUBLIC SCOPING MEETING INVITATION LETTER
AND DIGITAL POSTCARD



DEPARTMENT OF THE ARMY
OFFICE OF THE DEPUTY CHIEF OF STAFF, G-9
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

December 16, 2024

SUBJECT: Public Scoping Meeting for an Environmental Impact Statement for the Implementation of Base Realignment and Closure Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

CEQ Unique Identifier: EISX-007-21-000-1729699335

«Salutation» «First_Name» «Last_Name»
«RoleTitle»
«AgencyOrganization_Name»
«Address»
«City», «State» «Zip»

Dear «Salutation» «Last_Name»:

The U.S. Department of the Army (Army) invites you to attend a public scoping meeting for the subject upcoming environmental impact statement (EIS). The EIS will assess the potential environmental and socioeconomic effects associated with implementing the proposed disposal and reuse of a 132-acre parcel of land at the Savanna Army Depot Activity, which is approximately seven miles north of Savanna, Illinois. The Army would dispose of the parcel, known as LRA Parcel 20, by transferring it to the Jo-Carroll Depot Local Redevelopment Authority or other appropriate recipients for their reuse.

The meeting will be an open-house style meeting, where attendees can view displays about the project, ask questions, and make comments. Project team members will be available to answer questions. Attendees will have an opportunity to provide oral comments to a court reporter or written comments on available forms. Meeting details are provided below.

- **Date:** Thursday, January 16, 2025
- **Time:** 5:00–6:30 pm Central Standard Time
- **Place:** West Carroll High School, 500 Cragmoor Street, Savanna, IL 61074

If you are unable to attend the scoping meeting, the Army invites you to review scoping materials online at <https://www.lrd.usace.army.mil/Submit-ArticleCS/Programs/Article/3901394/>, and submit comments by email to SVADAEIS@tetrattech.com, or by U.S. mail to SVADA EIS c/o Tetra Tech, 107 St. Francis Street, Suite 2370, Mobile, AL 36602. Comments will be accepted at any time during the EIS process; however, to ensure the Army has sufficient time to consider public input during preparation of the Draft EIS, please submit comments by February 15, 2025.

Sincerely,

LINEER.THOMAS
S.ALDEN.11722
58375

Digitally signed by
LINEER.THOMAS.ALDEN.1
172258375
Date: 2024.12.03 09:16:58
-05'00'

Thomas Lineer
BRAC Program Manager

**The Department of the Army Seeks Public Input
On the Scope of the Environmental Impact Statement
For the Disposal and Reuse of LRA Parcel 20 at Savanna Army Depot Activity, Illinois**
CEQ Unique Identifier: EISX-007-21-000-1729699335

The Department of the Army (Army) is preparing an Environmental Impact Statement (EIS) to assess the potential effects on the human and natural environments associated with the disposal and reuse of a 132-acre parcel of land on Savanna Army Depot Activity (SVADA), Illinois. Under the proposed action, the Army would dispose of the parcel, known as Local Redevelopment Authority (LRA) Parcel 20, by transferring it to the Jo-Carroll Depot LRA (LRA) or other appropriate recipients for their reuse. The EIS will evaluate the potential direct effects of the Army conveying LRA Parcel 20 and the potential indirect effects of reuse of the parcel.

Public Scoping Process

The public scoping process will help to effectively define the full range of issues and concerns to be evaluated in the EIS under the National Environmental Policy Act (NEPA). Federal, state, and local agencies; federally recognized Tribes; nongovernmental organizations; community associations; and the public are invited to participate in the scoping process.

EIS Public Scoping Meeting

The Army invites the public, stakeholders, and other interested parties to attend the scoping meeting, as detailed below.

West Carroll High School
January 16, 2025 | 5:00–6:30 p.m.
500 Cragmoor Street
Savanna, IL 61074

The meeting will be an open-house style meeting, where attendees can view displays about the project, ask questions, and make comments. It will be an opportunity for attendees to learn more about the proposed action and the scope of the EIS. Project team members will be available to answer questions, and exhibits will be on view from 5:00 p.m. on. Attendees will have an opportunity to provide oral comments to a court reporter from 5:00 p.m. to 6:30 p.m. Written comments are encouraged and can be submitted at the meeting on available forms, or any time during the 30-day scoping period via mail or email.

Options for Providing Comments

If you are unable to attend the meeting, you can review scoping materials online at <https://www.lrd.usace.army.mil/Submit-ArticleCS/Programs/Article/3901394/>. **Comments will be accepted at any time during the NEPA environmental impact analysis process; however, to ensure the Army has sufficient time to consider public comments during preparation of the Draft EIS, please submit comments by February 15, 2025.** Comments can be submitted using the following methods:

Scoping Meeting

Provide written
or oral comments
during the meeting

Email

Send an email to
SVADAEIS@tetrattech.com

U.S. Mail

Mail comments to
SVADA EIS c/o Tetra Tech
107 St. Francis Street, Suite 2370
Mobile, AL 36602

APPENDIX E
AGENCY AND TRIBE SCOPING MEETING
INVITATION LETTER TEMPLATES AND EMAIL

Subject Line Insert: Invitation to the Agency & Tribe Scoping Meeting for the EIS of LRA Parcel 20, SVADA, Illinois

Message Insert:

Good morning <Title> <LastName>,

On behalf of the Department of the Army, we are pleased to invite you to a scoping meeting for agencies and Tribes on January 16, 2025 in Savanna, Illinois. The meeting is regarding an upcoming environmental impact assessment for the disposal and reuse of LRA Parcel 20 at the Savanna Army Depot Activity. Please see the attached invitation for meeting information.

Please RSVP by January 9, 2025 to: william.t.knuth.civ@army.mil

Thank you in advance for your time and consideration.

Respectfully,

<Signatory>

Note: If you wish to be removed from this email list, please send an email with subject line “STOP” to SVADAEIS@tetrattech.com.



DEPARTMENT OF THE ARMY
OFFICE OF THE DEPUTY CHIEF OF STAFF, G-9
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

December 20, 2024

SUBJECT: Agency and Tribe Scoping Meeting for an Environmental Impact Statement for the
Implementation of Base Realignment and Closure Disposal and Reuse of LRA Parcel 20,
Savanna Army Depot Activity, Illinois

CEQ Unique Identifier: EISX-007-21-000-1729699335

<Salutation> <First Name> <Last Name>, <Role/Title>
<Agency or Tribe Name>
<Address 1>
<City>, <State> <Zip 1>

Dear <Salutation> <Last Name>:

The U.S. Army (Army) invites you to attend a scoping meeting for the subject upcoming Environmental Impact Statement (EIS). The EIS will assess the potential environmental and socioeconomic effects associated with the proposed disposal and reuse of a 132-acre parcel of land at the Savanna Army Depot Activity (SVADA), which is approximately seven miles north of Savanna, Illinois. The Army would dispose of the parcel, known as LRA Parcel 20, by transferring it to the Jo-Carroll Depot Local Redevelopment Authority or other appropriate recipients for their reuse.

The meeting will be an opportunity for us to discuss the preparation of the EIS and the proposed action and potential alternatives, and for you to provide information relevant to the proposed action. The meeting information is below.

- **Date:** January 16, 2025
- **Time** (Central Standard Time): Morning Session: 10:00 am – 12:00 noon
Lunch Break: 12:00 pm – 1:00 pm (lunch is not included)
Afternoon Session: 1:00 pm – 3:00 pm
- **Place:** USFWS Upper Mississippi River National Wildlife and Fish Refuge Ingersoll Wetlands Learning Center, 7071 River Road, Thomson, IL 61285
- **RSVP:** By January 9, 2025 to Mr. Todd Knuth, SVADA Base Environmental Coordinator,
william.t.knuth.civ@army.mil

A public meeting will follow that evening, which you are also welcome to attend. If you are unable to attend either of the meetings, the Army invites you to review scoping materials online at <https://www.lrd.usace.army.mil/Submit-ArticleCS/Programs/Article/3901394/>, and submit comments by email to SVADAEIS@tetrattech.com, or by U.S. mail to SVADA EIS c/o Tetra Tech, 107 St. Francis Street, Suite 2370, Mobile, AL 36602. Comments will be accepted at any time during the EIS process; however, to ensure the Army has sufficient time to consider public input during preparation of the Draft EIS, please submit comments by February 15, 2025.

Printed on Recycled Paper



We hope you will join us. If you have any questions, please contact Todd Knuth by email at william.t.knuth.civ@army.mil or by phone at 815-273-8312.

Sincerely,

LINEER.THOMAS.
ALDEN.11722583
75



Digitally signed by
LINEER.THOMAS.ALDEN.11722583
5
Date: 2024.12.09 15:51:24 -05'00'

Thomas Lineer
BRAC Program Manager

cc:

Mr. Joe Hand, Contracting Officer Representative, USACE, Mobile District,
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity
Ms. Casey Potts, Technical Manager, USACE, Mobile District
Mr. Travis Black, Director, Inland Waterways Gateway (St. Louis), USDOT MARAD
Mr. Ed Britton, District Manager, USFWS, Upper Mississippi River National Wildlife and Fish Refuge,
Savanna District Office
Mr. Johnathon Buffalo, THPO, Sac & Fox Tribe of the Mississippi in Iowa
Ms. Tiauna Carnes, Chairperson, Sac & Fox Nation of Missouri in Kansas and Nebraska
Mr. Randle Carter, Principal Chief, Sac & Fox Nation, Oklahoma
Mr. Kent Collier, NAGPRA, Kickapoo Tribe of Oklahoma
Ms. Jodi Creswell, Chief, Environmental Planning Branch, USACE, Rock Island District
Ms. Charlene Falco, Project Manager, Federal Site Remediation Section, Bureau of Land, Illinois EPA
Ms. Regina Gasco-Bentley, Chairperson, Little Traverse Bay Bands of Odawa Indians
Ms. Nicole Goers, Remedial Project Manager, USEPA Region 5, Superfund & Emergency Management
Division
Mr. John Greendeer, President, Ho-Chunk Nation of Wisconsin
Mr. David Grignon, THPO, Menominee Indian Tribe of Wisconsin
Mr. Bradley Hayes, Manager, Impact Assessment Section, Illinois DNR
Dr. Andrea Hunter, Director and THPO, Historic Preservation Office, The Osage Nation
Mr. Vern Jefferson, Chairman, Sac & Fox Tribe of the Mississippi in Iowa
Ms. Gena Kakkak, Chairwoman, Menominee Indian Tribe of Wisconsin
Mr. Darwin Kaskaske, Chairman, Kickapoo Tribe of Oklahoma
Ms. Kathy Kowal, Lead NEPA Reviewer, USEPA Region 5
Ms. Victoria Kitcheyan, Chairwoman, Winnebago Tribe of Nebraska
Mr. Christopher Koeppel, Assistant Director, Office of Federal Agency Programs, Federal Property
Management Section, Advisory Council on Historic Preservation
Mr. Douglas Lankford, Chief, Miami Tribe of Oklahoma
Ms. Sandra Massey, THPO, Sac & Fox Nation, Oklahoma
Ms. Krystle McClain, NEPA Program Supervisor, USEPA, Region 5
Mr. Kraig McPeck, Field Office Supervisor, USFWS, Illinois-Iowa Ecological Services Field Office
Ms. Natalie Phelps Finnie, Director, Illinois DNR
Mr. William Quackenbush, THPO, Ho-Chunk Nation of Wisconsin
Mr. Geoffrey Standing Bear, Principal Chief, The Osage Nation
Ms. Sunshine Thomas-Bear, THPO, Winnebago Tribe of Nebraska
Ms. Susan Tiger, NAGPRA Representative, Kickapoo Tribe of Oklahoma

Ms. Carol (CJ) Wallace, Cultural Resources Coordinator, Illinois DNR
Ms. Melissa Wiatroluk, THPO, Little Traverse Bay Bands of Odawa Indians
Mr. Logan York, THPO, Miami Tribe of Oklahoma

APPENDIX F
AGENCY AND TRIBE STAKEHOLDER
DISTRIBUTION LIST

SVADA LRA Parcel 20 EIS								
Agency and Tribe Stakeholder List								
Affiliation 1	Affiliation 2	Salutation	First Name	Last Name	Role/Title	Agency or Tribe Name	City	State
Federal Government	USFWS	Mr.	Kraig	McPeck	Field Office Supervisor	USFWS, Illinois-Iowa Ecological Services Field Office	Moline	IL
Federal Government	USFWS	Mr.	Ed	Britton	District Manager	USFWS, Upper Mississippi River National Wildlife and Fish Refuge, Savanna District Office	Thomson	IL
Federal Government	USACE	Ms.	Jodi	Creswell	Chief, Environmental Planning Branch	USACE, Rock Island District	Rock Island	IL
Federal Government	USEPA	Ms.	Krystle	McClain	NEPA Program Supervisor	US EPA Region 5	Chicago	IL
Federal Government	USEPA	Ms.	Nicole	Goers	Remedial Project Manager, Remedial Response Section 5	U.S. EPA Region 5, Superfund & Emergency Management Division	Chicago	IL
Federal Government	USEPA	Ms.	Kathy	Kowal	Lead NEPA Reviewer	US EPA Region 5	Chicago	IL
Federal Government	USDOT	Mr.	Travis	Black	Director, Inland Waterways Gateway (St. Louis)	US DOT Maritime Administration (MARAD)	St. Louis	MO
Federal Government	USDOT	Mr.	Travis	Black	Director, Inland Waterways Gateway (St. Louis)	US DOT Maritime Administration (MARAD)	Washington	DC
Federal Government	ACHP	Mr.	Christopher	Koeppel	Assistant Director, Office of Federal Agency Programs	Advisory Council on Historic Preservation	Washington	DC
State Government	IL EPA	Ms.	Charlene	Falco	Project Manager, Federal Site Remediation Section, Bureau of Land	Illinois EPA (IEPA), Headquarters	Springfield	IL
State Government	IL DNR	Ms.	Natalie	Phelps Finnie	Director	Illinois DNR	Springfield	IL
State Government	IL DNR	Mr.	Bradley	Hayes	Manager, Impact Assessment Section	Illinois DNR, EcoCAT, Div. of Real Estate Services & Consultation, Office of Realty & Capital Planning	Springfield	IL
State Government	IL DNR	Ms.	CJ (Carol)	Wallace	Cultural Resources Coordinator	Illinois DNR, Attn: State Historic Preservation Office	Springfield	IL
Tribe	Tribe	Mr.	Kent	Collier	NAGPRA	Kickapoo Tribe of Oklahoma	McCloud	OK
Tribe	Tribe	Ms.	Susan	Tiger	NAGPRA Representative	Kickapoo Tribe of Oklahoma	McCloud	OK
Tribe	Tribe	Chairman	Darwin	Kaskaske		Kickapoo Tribe of Oklahoma	McCloud	OK

Tribe	Tribe	Mr.	William	Quackenbush	THPO	Ho-Chunk Nation of Wisconsin	Black River Falls	WI
Tribe	Tribe	President	John	Greendeer		Ho-Chunk Nation of Wisconsin	Black River Falls	WI
Tribe	Tribe	Ms.	Melissa	Wiatrolik	THPO	Little Traverse Bay Bands of Odawa Indians, Michigan	Harbor Springs	MI
Tribe	Tribe	Chairperson	Regina	Gasco-Bentley		Little Traverse Bay Bands of Odawa Indians, Michigan	Harbor Springs	MI
Tribe	Tribe	Mr.	David	Grignon	THPO	Menominee Indian Tribe of Wisconsin	Keshena	WI
Tribe	Tribe	Chairwoman	Gena	Kakkak		Menominee Indian Tribe of Wisconsin	Keshena	WI
Tribe	Tribe	Mr.	Logan	York	THPO	Miami Tribe of Oklahoma	Miami	OK
Tribe	Tribe	Chief	Douglas	Lankford		Miami Tribe of Oklahoma	Miami	OK
Tribe	Tribe	Dr.	Andrea	Hunter	Director and THPO, Historic Preservation Office	The Osage Nation	Pawhuska	OK
Tribe	Tribe	Principal Chief	Geoffrey	Standing Bear		The Osage Nation	Pawhuska	OK
Tribe	Tribe	Principal Chief	Geoffrey	Standing Bear		The Osage Nation	Pawhuska	OK
Tribe	Tribe	Chairperson	Tiauna	Carnes		Sac & Fox Nation of Missouri in Kansas and Nebraska	Reserve	KS
Tribe	Tribe	Ms.	Sandra	Massey	THPO	Sac & Fox Nation, Oklahoma	Stroud	OK
Tribe	Tribe	Principal Chief	Randle	Carter		Sac & Fox Nation, Oklahoma	Stroud	OK
Tribe	Tribe	Chairman	Vern	Jefferson		Sac & Fox Tribe of the Mississippi in Iowa	Tama	IA
Tribe	Tribe	Mr.	Johnathon	Buffalo	THPO	Sac & Fox Tribe of the Mississippi in Iowa	Tama	IA
Tribe	Tribe	Ms.	Sunshine	Thomas-Bear	THPO	Winnebago Tribe of Nebraska	Winnebago	NE
Tribe	Tribe	Chairwoman	Victoria	Kitcheyan		Winnebago Tribe of Nebraska	Winnebago	NE

APPENDIX G
AGENCY AND TRIBE SCOPING MEETING SIGN-IN
SHEETS

Attendee Roster – BRAC SVADA LRA Parcel 20 Agency and Tribe Scoping Meeting

January 16, 2025 · 10:00 a.m. – 3:00 p.m.

USFWS Upper Mississippi River National Wildlife and Fish Refuge Ingersoll Learning Center, 7071 River Road, Thomson, Illinois

If you wish to have your name added to the project mailing list and listed in the project administrative record, please enter your name and address below.

CEQ Unique Identifier: EISX-007-21-000-1729699335

Name: Oyermude Stephen Timmer
Organization: Illinois EPA
Address: [REDACTED]
City, State, ZIP: Springfield, IL 62702
Phone: [REDACTED]
E-mail: [REDACTED]

.....
Name: Ryan Sherman
Organization: Illinois EPA
Address: [REDACTED]
City, State, ZIP: Springfield, IL
Phone: [REDACTED]
E-mail: [REDACTED]

.....
Name: Kevin Landwehr
Organization: USACE
Address: [REDACTED]
City, State, ZIP: Rock Island, IL 61204
Phone: [REDACTED]
E-mail: [REDACTED]

Name: JOE HAND
Organization: USACE - Mobile District
Address: [REDACTED]
City, State, ZIP: [REDACTED]
Phone: [REDACTED]
E-mail: [REDACTED]

.....
Name: Charlene Falco
Organization: IL EPA
Address: [REDACTED]
City, State, ZIP: Spd, IL 62794-9276
Phone: [REDACTED]
E-mail: [REDACTED]

.....
Name: Duane Ambrose
Organization: IL Dept of Nat Resources
Address: [REDACTED]
City, State, ZIP: Savanna IL 61074
Phone: [REDACTED]
E-mail: [REDACTED]

Attendee Roster – BRAC SVADA LRA Parcel 20 Agency and Tribe Scoping Meeting

January 16, 2025 • 10:00 a.m. – 3:00 p.m.

USFWS Upper Mississippi River National Wildlife and Fish Refuge Ingersoll Learning Center, 7071 River Road, Thomson, Illinois

If you wish to have your name added to the project mailing list and listed in the project administrative record, please enter your name and address below.

CEQ Unique Identifier: EISX-007-21-000-1729699335

Name: William Robinson
Organization: LRA
Address: [REDACTED]
City, State, ZIP: Savanna, IL 61074
Phone: [REDACTED]
E-mail: [REDACTED]

.....
Name: Bernany Aoster
Organization: USACE - Rock Island
Address: [REDACTED]
City, State, ZIP: [REDACTED]
Phone: [REDACTED]
E-mail: [REDACTED]

.....
Name: Caitlin Mendoza
Organization: USACE - Rock Island
Address: [REDACTED]
City, State, ZIP: [REDACTED]
Phone: [REDACTED]
E-mail: [REDACTED]

Name: Brian Barnett
Organization: USACE - Rock Island
Address: [REDACTED]
City, State, ZIP: [REDACTED]
Phone: [REDACTED]
E-mail: [REDACTED]

.....
Name: Linda Balcom
Organization: BALCOM ENVIRONMENTAL SVS
Address: [REDACTED]
City, State, ZIP: CO SPRINGS, CO
Phone: [REDACTED]
E-mail: [REDACTED]

.....
Name: Ed Britton
Organization: USFWS
Address: [REDACTED]
City, State, ZIP: [REDACTED]
Phone: [REDACTED]
E-mail: [REDACTED]

Attendee Roster – BRAC SVADA LRA Parcel 20 Agency and Tribe Scoping Meeting

January 16, 2025 · 10:00 a.m. – 3:00 p.m.

USFWS Upper Mississippi River National Wildlife and Fish Refuge Ingersoll Learning Center, 7071 River Road, Thomson, Illinois

If you wish to have your name added to the project mailing list and listed in the project administrative record, please enter your name and address below.

CEQ Unique Identifier: EISX-007-21-000-1729699335

Name: Todd Knuth
Organization: US Army
Address: [REDACTED]
City, State, ZIP: Savanna IL 61077
Phone: [REDACTED]
E-mail: [REDACTED]

.....
Name: Mara Roche
Organization: LRA
Address: [REDACTED]
City, State, ZIP: Savanna, IL 61074
Phone: [REDACTED]
E-mail: [REDACTED]

.....
Name: Joseph Lunell
Organization: Corps
Address: [REDACTED]
City, State, ZIP: Prasent Valley IA 52767
Phone: [REDACTED]
E-mail: [REDACTED]

Name: Robert Davies
Organization: JCOLRA
Address: [REDACTED]
City, State, ZIP: IL 61079
Phone: [REDACTED]
E-mail: [REDACTED]

.....
Name: Steve Keffer
Organization: LRA /UMRI PD/ Jo Davies County High
Address: [REDACTED]
City, State, ZIP: Hanover, IL 61041
Phone: [REDACTED]
E-mail: [REDACTED]

.....
Name: Julie Embault
Organization: USACE
Address: [REDACTED]
City, State, ZIP: [REDACTED]
Phone: [REDACTED]
E-mail: [REDACTED]

Attendee Roster – BRAC SVADA LRA Parcel 20 Agency and Tribe Scoping Meeting

January 16, 2025 · 10:00 a.m. – 3:00 p.m.

USFWS Upper Mississippi River National Wildlife and Fish Refuge Ingersoll Learning Center, 7071 River Road, Thomson, Illinois

If you wish to have your name added to the project mailing list and listed in the project administrative record, please enter your name and address below.

CEQ Unique Identifier: EISX-007-21-000-1729699335

Name: NICOLE GOERS

Organization: USEPA

Address: _____

City, State, ZIP: CHICAGO, IL 60604

Phone: [REDACTED]

E-mail: [REDACTED]

.....

Name: KATHY KOWAL

Organization: USEPA

Address: _____

City, State, ZIP: Chicago

Phone: [REDACTED]

E-mail: [REDACTED]

.....

Name: KEYSTLE WOLCHIN

Organization: USEPA

Address: _____

City, State, ZIP: CHICAGO, IL

Phone: [REDACTED]

E-mail: [REDACTED]

Name: _____

Organization: _____

Address: _____

City, State, ZIP: _____

Phone: _____

E-mail: _____

.....

Name: _____

Organization: _____

Address: _____

City, State, ZIP: _____

Phone: _____

E-mail: _____

.....

Name: _____

Organization: _____

Address: _____

City, State, ZIP: _____

Phone: _____

E-mail: _____

Attendee Roster – BRAC SVADA LRA Parcel 20 Agency and Tribe Scoping Meeting

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USFWS Upper Mississippi River National Wildlife and Fish Refuge Ingersoll Learning Center, 7071 River Road, Thomson, Illinois

If you wish to have your name added to the project mailing list and listed in the project administrative record, please enter your name and address below.

CEQ Unique Identifier: EISX-007-21-000-1729699335

Name: Natalie Romain

Organization: USEPA

Address: _____

City, State, ZIP: Chicago, IL

Phone: [REDACTED]

E-mail: [REDACTED]

.....

Name: David Howlett

Organization: Army, Enroute Law Division

Address: _____

City, State, ZIP: Fort Belvoir, VA

Phone: [REDACTED]

E-mail: [REDACTED]

.....

Name: Rebecca Webster

Organization: Tetra Tech

Address: _____

City, State, ZIP: Morgantown, WV

Phone: _____

E-mail: [REDACTED]

Name: _____

Organization: _____

Address: _____

City, State, ZIP: _____

Phone: _____

E-mail: _____

.....

Name: _____

Organization: _____

Address: _____

City, State, ZIP: _____

Phone: _____

E-mail: _____

.....

Name: _____

Organization: _____

Address: _____

City, State, ZIP: _____

Phone: _____

E-mail: _____

Your information will not be used for any purpose other than to provide you a link to a digital copy of the EIS.

APPENDIX H INFORMATIONAL BANNERS

Welcome!

Please sign in and get added to the project mailing list.

AGENDA

5:00 - 6:30 p.m.

Open-house

- view displays
- ask questions
- make comments

This meeting is an informal process where participants

- can learn about the project,
- explore various displays related to the meeting purpose, and
- ask questions.

A court reporter will be present to take formal comments, or you can provide feedback other ways.



For more information

**Comments
can be
submitted**

**4
Ways**

Submit comments during this public involvement process for consideration in the EIS by:

- 1 Submitting a written comment at this meeting.**
- 2 Making an oral comment to the court reporter at this meeting.**
- 3 Emailing comments to SVADAEIS@tetrattech.com at a later date.**
- 4 Mailing comments via U.S. mail to:**
SVADA EIS c/o Tetra Tech
107 St. Francis Street, Suite 2370
Mobile, AL 36602

*Comments will be accepted anytime but submission **no later than 30 days from the date of this meeting** will ensure your comment is considered during the National Environmental Policy Act analysis.*



Base Realignment and Closure Savanna Army Depot Activity
ENVIRONMENTAL IMPACT STATEMENT

CEQ Unique Identifier: EISX-007-21-000-1729699335

Base Realignment and Closure

National Environmental Policy Act Documentation

NEPA The National Environmental Policy Act (NEPA) of 1969, as amended

- Addresses concerns about federal actions and their effects on the environment
- Is implemented when a federal agency develops a proposal for a project that might affect the human or natural environment

NEPA's Main Objectives

- **Ensure high-quality analysis** of potential effects of proposed major federal actions
- **Inform the public** of proposed federal activities that might affect environmental quality
- **Encourage and facilitate public involvement** in the decision-making process
- **Inform decision-making** by identifying issues of concerns and potential effects of proposed action implementation



- Clean Air Act
- Clean Water Act
- Coastal Zone Management Act
- Contaminated materials and substances
- Endangered Species Act
- Environmental Justice Executive Orders
- Federal Flood Risk Management Executive Order
- Floodplain Management Executive Order
- Limited English Proficiency Executive Order

- Local Environmental Laws
- Migratory Bird Treaty Act
- Military Construction and Appropriations Act
- Noise ordinances
- Protection of Wetlands Executive Order
- Section 106 of the National Historic Preservation Act
- State Environmental Laws
- Upper Mississippi River National Wildlife and Fish Refuge Act
- U.S. Department of Transportation Act of 1966; Section 4(f)

Proposed Action and Alternatives

NEPA requires the agencies to evaluate

- **Proposed Action:** The project being considered for implementation
- **No Action:** Conditions if the project under consideration is not implemented
- **Reasonable alternatives** to implementing the project Proposed Action

SVADA BRAC EIS Major Milestone Schedule

Milestone	Completion Date
NOI in Federal Register	Winter 2024
Scoping Meeting	Winter 2025
Scoping Period	Winter 2025
Draft EIS for Public Review	Fall 2025
Draft EIS Public Meeting	Fall 2025
Draft EIS Comment Period Closes	Winter 2025
Final EIS for Public Review	Spring 2026
Final Record of Decision	Spring 2026



Base Realignment and Closure Savanna Army Depot Activity ENVIRONMENTAL IMPACT STATEMENT

CEQ Unique Identifier: EISX-007-21-000-1729699335

Base Realignment and Closure

National Environmental Policy Act Documentation

BRAC Base Realignment and Closure (BRAC) is:

- Department of Defense process to reorganize military bases to meet changing needs
- Ensures military resources are used effectively while minimizing the negative effects on local communities



Courtesy of the U.S. Army

SVADA Savanna Army Depot Activity

SVADA, established in 1917 during World War I, supported a proof and test facility for artillery guns and howitzers produced at Rock Island Arsenal, IL. Operations were expanded to include storage of ordnance and the loading and renovation of shells and bombs. Levels of ammunition maintenance and supply operations were reduced in 1972.

BRAC 95 Disposal and Reuse of the Savanna Army Depot Activity Environmental Impact Statement, Savanna, Illinois (1997 BRAC EIS) was finalized for SVADA in July 1997. SVADA ceased operations and officially closed on May 20, 2000.

The BRAC process

- ✓ Commits to necessary environmental remediation or certifies SVADA property parcels are clean from environmental contaminants
- ✓ Facilitates Army property transfer to federal, state, or local agencies

Owners of Savanna Army Depot Activity parcels:

- U.S. Fish and Wildlife Service (USFWS)
- U.S. Army Corps of Engineers (USACE)
- Illinois Department of Natural Resources (DNR)
- Jo-Carroll Depot Local Redevelopment Authority (LRA)



Base Realignment and Closure Savanna Army Depot Activity ENVIRONMENTAL IMPACT STATEMENT

CEQ Unique Identifier: EISX-007-21-000-1729699335

The BRAC SVADA

Environmental Impact Statement Alternatives

View full plan [here](#).



EIS

will be prepared
because:

- There have been substantial changes to the proposed action and,
- Significant new circumstances and information relevant to environmental concerns and bearing on the proposed action's effects have been identified.

Purpose: Army disposal of LRA Parcel 20 through transfer to the LRA or other appropriate recipients.

Need: Carry out BRAC recommendations for the closure of SVADA, which became law, and make the parcel available for reuse.

Alternatives

NEPA requires consideration of all alternatives – no alternative has been selected. The EIS will evaluate all of the following alternatives.

- ➔ **Proposed Action:** The Proposed Action is the Army's disposal of LRA Parcel 20 by transferring it to the LRA or other appropriate recipients for their reuse. The EIS will analyze the potential direct effects of the Army conveying LRA Parcel 20 and the potential indirect effects of reuse of the parcel.
- ➔ **No Action Alternative:** Parcel 20 is retained in caretaker status by the Army. The No Action Alternatives is also the baseline against which the Proposed Action and other alternatives are compared.
- ➔ **Reuse Alternatives:** The EIS considers five reuse alternatives: three reuse alternatives proposed by the LRA in their 2023 reuse plan that focus on creating a new port facility with docks, wharves, conveyor system, and roads, plus recreational facilities and potentially solar development; a recreation only reuse alternative; and a recreation and solar reuse alternative.

LRA Reuse Features

- An 800-foot by 100-foot dry and liquid bulk wharf
- A conveyor system
- A floating dry dock
- A haul road
- A 350-foot lift-on/lift-off wharf
- A 600-foot lift-on/lift-off wharf
- A liquid bulk pipeline
- A recreational boat ramp
- A recreational trail
- A fleet repair area
- A solar farm or recreational area atop a closed landfill
- Travel lift piers with a landside dry dock
- A wharf access road
- Dredging up to 1.24 million cubic yards of sediment from 246 acres within Commander's Pond (16 acres of aquatic habitat restoration within Commander's Pond)
- Barge fleeting areas in Brick House Slough and the Mississippi River



Base Realignment and Closure Savanna Army Depot Activity ENVIRONMENTAL IMPACT STATEMENT

CEQ Unique Identifier: EISX-007-21-000-1729699335

NEPA

Public Scoping

The Department of the Army invites you to define important environmental quality issues and identify alternatives to the Proposed Action.

What is Scoping?

- Scoping is part of the EIS preparation process.
- It is used to identify important environmental issues deserving of study.
- It is an opportunity for the Army to inform the public of a proposed action and possible alternatives.
- It is an opportunity for the public to provide input on what should be considered as the Army develops the scope of the EIS, such as environmental quality issues and identifying alternatives to the Proposed Action.

Potential resource areas that may be affected:

Aesthetics and Visual Resources

- Landscape character
- Historic viewsheds
- Sensitive views

Air Quality

- National Ambient Air Quality Standards
- Emissions and permitting
- General Conformity
- Climate change and greenhouse gases

Biological Resources

- Vegetation
- Threatened and endangered species
- Wildlife
- Sensitive species and habitat
- USFWS/USACE refuge property

Cultural and Historic Resources

- Cultural resource management
- Traditional cultural resources
- Prehistoric and historic resources
- National Historic Preservation Act Section 106 consultations

Geology and Soils

- Physiography and topography
- Soils
- Geology
- Geologic hazards

Hazardous Materials and Waste Management

- General hazardous materials and waste management
- Landfill
- Contaminated sites
- Lead, asbestos, and pesticides

Land Use

- Land Use Ownership and Districts
- Land Use Policies, Plans, and Controls

Noise

- Ambient noise
- Construction noise
- Operational and maintenance noise

Socioeconomics

- Employment and Income
- Environmental justice

Transportation

- Roadway networks and traffic

Utilities and Infrastructure

- Water and wastewater
- Stormwater management
- Solid waste management
- Electricity
- Natural gas
- Communications

Water Resources

- Surface water features and drainage
- Hydrology
- Groundwater



Base Realignment and Closure Savannah Army Depot Activity

ENVIRONMENTAL IMPACT STATEMENT

CEQ Unique Identifier: EISX-007-21-000-1729699335

The BRAC SVADA

Environmental Impact Statement Mitigation

You are
invited to comment
on these, or other
concerns you might have
regarding the SVADA
proposed action and
alternatives.



Mitigation is:

Avoiding, minimizing, and compensating for unacceptable effects on the human environment and other resources that might result from a proposed action.

Previously identified areas of potential concern at SVADA that may require mitigation include:

Waters of the United States (WOTUS), including wetlands

- Dredging of WOTUS in Commander's Pond
- Access channel dredging in Brick House Slough
- Barge floating dredging in Brick House Slough and the Mississippi River

Floodplains

- Redevelopment alternatives may be constructed within the floodplain

Upper Mississippi River National Wildlife and Fish Refuge

- Redevelopment activities may affect Upper Mississippi refuge property or property currently managed by the U.S. Fish and Wildlife Service for conservation

Cultural and historic resources

- Cultural and historic resources can be expected within alternative's Area of Potential Effect (APE)

Hazardous and toxic contamination

- Areas of remediated hazardous and toxic contamination are in the project area
- A capped landfill is in the project area

Inland navigation features

- The proposed redevelopment includes modification of the Mississippi River Navigation Channel
- Inland navigation features may be impacted by proposed redevelopment
- Activities associated with operation of the LRA's proposed inland port could affect navigation features, water conveyance, and sediment conveyance in the project vicinity

Federally and state listed protected species

- Federally and state protected species have been documented in the project vicinity and may be affected

Federally Protected Species That Might Occur on LRA Parcel 20

Scientific name	Common Name	Federal Status	State Status
Mammals			
Myotis sodalis	Indiana Bat	E	E
Myotis septentrionalis	Northern Long-Eared Bat	T	T
Mussels			
Lampsilis higginsii	Higgins Eye (pearlymussel)	E	E
Plethobasus cyphus	Sheepnose Mussel	E	E
Flowering Plants			
Platanthera leucophaea	Eastern Prairie Fringed Orchid	T	E

Sources: IDNR 2015; USFWS 2020.

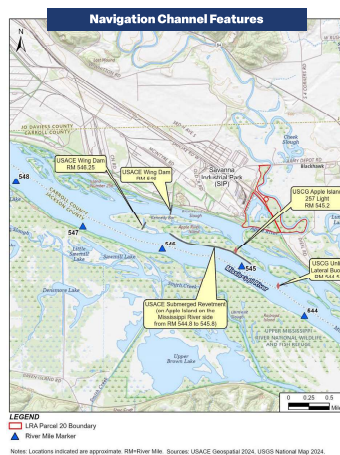
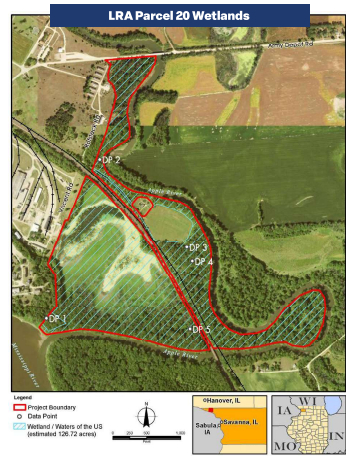
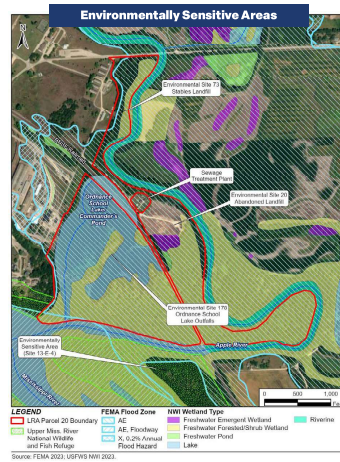
Note: E=endangered, T=threatened.



Base Realignment and Closure Savanna Army Depot Activity ENVIRONMENTAL IMPACT STATEMENT

CEQ Unique Identifier: EISX-007-21-000-1729699335

MAPS



Base Realignment and Closure Savanna Army Depot Activity ENVIRONMENTAL IMPACT STATEMENT

CEQ Unique Identifier: EISX-007-21-000-1729699335

**APPENDIX I
AGENCY AND TRIBE SCOPING MEETING
POWERPOINT PRESENTATION**



**SVADA
BRAC Environmental Impact
Statement
Agency Scoping Meeting**

16 January 2025

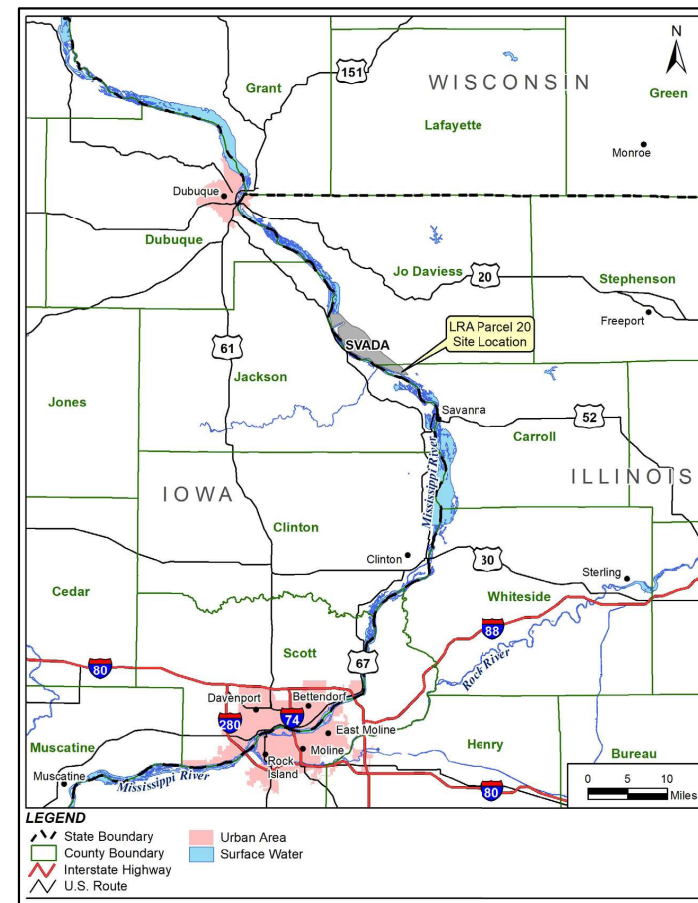
**USACE, Mobile District
Contract Number W91278-20-D-
0053, Task Order Delivery
W9127823F0303**

Leading with Science®

SVADA BRAC EIS, Agency Scoping Meeting Agenda

- Introductions
- Agenda
 - Opening Statement
 - Project Overview
 - Status Update
 - Alternatives
- Discussion
 - Agency concerns

Note: This meeting is being transcribed/recorded



SVADA BRAC EIS, Status

- **Notice of Intent (NOI)**
 - **20 December 2024 publication**
- **Scoping Meetings**
 - **Agency scoping meeting**
 - **10:00-12:00 am and 1:00-3:00 pm CST, 16 January 2025, Upper MS River National Wildlife and Fish Refuge, 7071 Riverview Road, Thomson IL**
 - **Public scoping meeting**
 - **5:00-6:30 pm CST, 16 January 2025, West Carroll High School, 500 Cragmoor Street, Savanna IL**
- **Description of Proposed Action and Alternatives**
 - **No Action**
 - **Disposal**
 - **Recreation**
 - **Reuse**
- **Affected environment preparation**

Savanna BRAC EIS Major Milestone Schedule 16 January 2025	
Milestone	Completion Date
Kick Off Meeting	06/20/24
Final DOPAA	08/04/24
NOI in Federal Register	12/20/24
Scoping Meeting	01/16/25
Scoping Period Closes	02/15/25
Draft EIS for Public Review	10/31/25
Draft EIS NOA in Federal Register	10/31/25
Draft EIS Public Meeting	11/20/25
Draft EIS Comment Period Closes	12/15/25
Draft Final EIS and Draft ROD	02/09/26
Final EIS for Public Review	03/27/26
FEIS NOA in Federal Register	04/10/26
End of 30-day waiting period	05/10/26
Final ROD submitted for staffing	05/17/26

SVADA BRAC EIS, Alternatives

- **Description of Proposed Action and Alternatives**

- **Alternatives**

- **No Action**
 - ☐ **Caretaker Status**
 - **Accelerated Disposal, Parcel 20**
 - **Recreation**
 - ☐ **With photovoltaic solar array**
 - ☐ **Without photovoltaic solar array**
 - **LRA Reuse Development**
 - ☐ **Phases 1, 2, and 3**
 - ☐ **Includes Parcel 20 and Savanna Industrial Park**



SVADA BRAC EIS, Project Proposed Action

• Accelerated Disposal

- **Formerly Traditional Disposal**
 - Not viable under current timeline
- **Includes Army commitment to remediation post transfer**
- **Per and Polyfluoroalkyl substances (PFAS)**
 - **Site Inspection Report for Per and Polyfluoroalkyl substances at Savanna Army Depot, Savanna, Illinois, April 2024**
 - **Recommended Remedial Investigation**
 - ☐ **New PFAS guidance promulgated**
 - ☐ **Report submitted under superseded guidance**
 - **CERCLA waste**
 - **Savanna Army Depot**
 - ☐ **Landfill groundwater monitoring wells**
 - ☐ **3 samples, 1 hit <.1 Target Hazard Quotient**
- **Remedial Investigation is required**
 - **Assumed to require mitigation unless demonstrated otherwise**

3.8.1 Accelerated Disposal Alternative

Under this alternative, the Army will take advantage of various property transfer and disposal methods that allow the reuse of the property to occur before environmental remedial action has been taken. One of these methods is to lease the property to a non-Army entity. For this, a finding of suitability to lease is prepared (see Section 5.10.4). Another method is to transfer the property to another federal agency and arrange for that other federal agency to be responsible for all environmental response.

Another possibility is to defer the requirement to complete environmental cleanup and allow an early transfer of the property. Such deferral requires concurrence of environmental authorities and the governor of the affected state. The property must be suitable for the new owner's intended use, and that use must be consistent with protection of human health and the environment (see Section 5.10.5). Another method is to transfer the property to a new owner who agrees to perform all environmental remediation, waste management, and environmental compliance activities that are required for the property under Federal and state requirements. (BRAC law §2905(e)).

3.8.2 Traditional Disposal Alternative

Under the BRAC law, the Army is required to close all military installations recommended for closure by the BRAC Commission. The Army is also given broad authority to transfer the property to other government agencies or to dispose of it to non-government organizations. Under this alternative, the Army will transfer or dispose of property once environmental remediation and other environmental clearance is complete for individual parcels of the installation. The Army is required under the Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) to identify speedily uncontaminated property. Uncontaminated property is defined as property on which no hazardous substances and no petroleum products or their derivatives were known to have been released or disposed of (see Section 5.11). Such property will be available for transfer or disposal fairly quickly. For property on which hazardous substances were stored for 1 year or more, known to have been released, or disposed of, other provisions apply. The Army must be able to certify that all required environmental action necessary to protect human health or the environment has been taken before the transfer or disposal. Transfer of property is allowed if a long-term environmental remedy is shown to be operating properly and successfully. Some environmental remedial actions may take a long time to be selected, approved, and implemented. Because of this, there may be a prolonged period under this alternative during which parcels are not available for transfer or disposal.

Reference: Base Realignment and Closure Guidelines for Compliance with the National Environmental Policy Act, April 2006, Guidance on Preparing Environmental Documentation for Army Base Realignment and Closures Action in Compliance with the National Environmental Policy Act of 1969 (NEPA)

SVADA BRAC EIS, Recreation Alternatives

- **Recreation Alternatives**

- **Passive recreation features**

- Walking paths, bike trails, kayak/canoe launch, etc.

- **Recreation Alternative 1**

- With photovoltaic solar array atop closed landfill

- **Recreation Alternative 2**

- Without photovoltaic solar array



SVADA BRAC EIS Reuse Development Alternative(s)

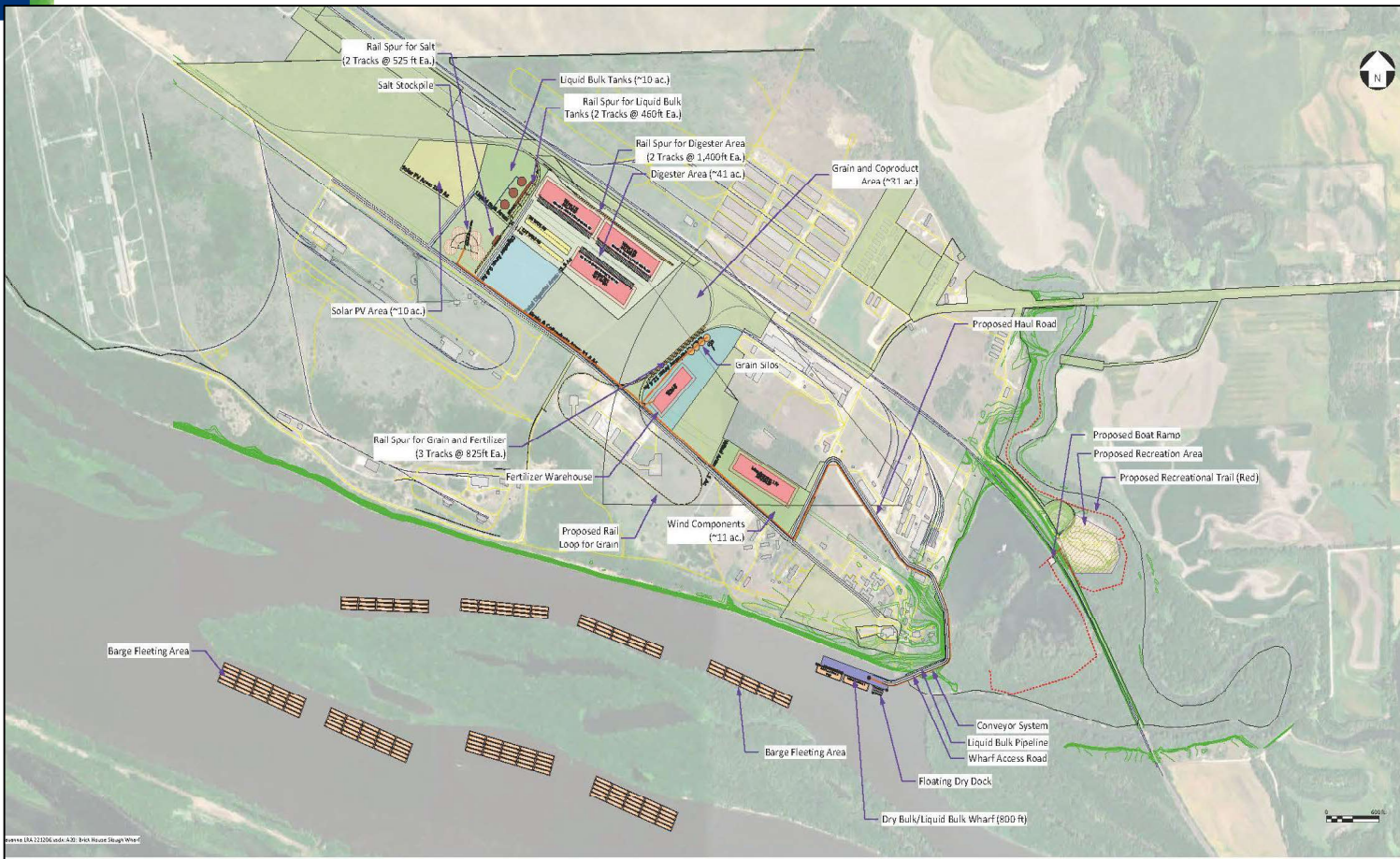


• Reuse Development

- Secondary/indirect, non-Army action
- Would not occur without Army's primary action of disposal
- Effects analysis
 - Quantitatively and qualitatively assess direct effects in Parcel 20
 - Intensity Use Analysis in Savanna Industrial Park

	Alternative 3a: LRA Brickhouse Slough Reuse	Alternative 3b: LRA Commander's Pond Lite Reuse	Alternative 3c: LRA Commander's Pond Full Reuse
Development Features by Alternative			
800-foot x 100-foot dry and liquid bulk wharf	X	X	X
Conveyor system	X	X	X
Floating dry dock	X	X	X
Haul road	X	X	X
LOLO wharf, 350 feet			X
L-shaped LOLO wharf, 600 feet x 50 feet and 290 feet x 75 feet		X	X
Liquid bulk pipeline	X	X	X
Recreational boat ramp	X	X	X
Recreational trail	X	X	X
Recreational area or solar PV arrays atop capped landfill ^a	X	X	X
Repair fleeting area			X
Travel lift piers with landside dry dock		X	X
Wharf access road	X	X	X
Dredging (Brick House Slough and Commander's Pond) by Alternative			
Dredging (estimated acreage)	186 acres	18 acres	42 acres ^b
Dredging volumes (estimated cubic yards)			
Brick House Slough	399,228	399,228	399,228
Commander's Pond dredge cut		524,533	524,533
Commander's Pond aquatic habitat restoration area			313,689
Cumulative dredge volume by alternative	399,228	923,761	1,237,450

SVADA BRAC EIS Reuse Development Alternative(s)

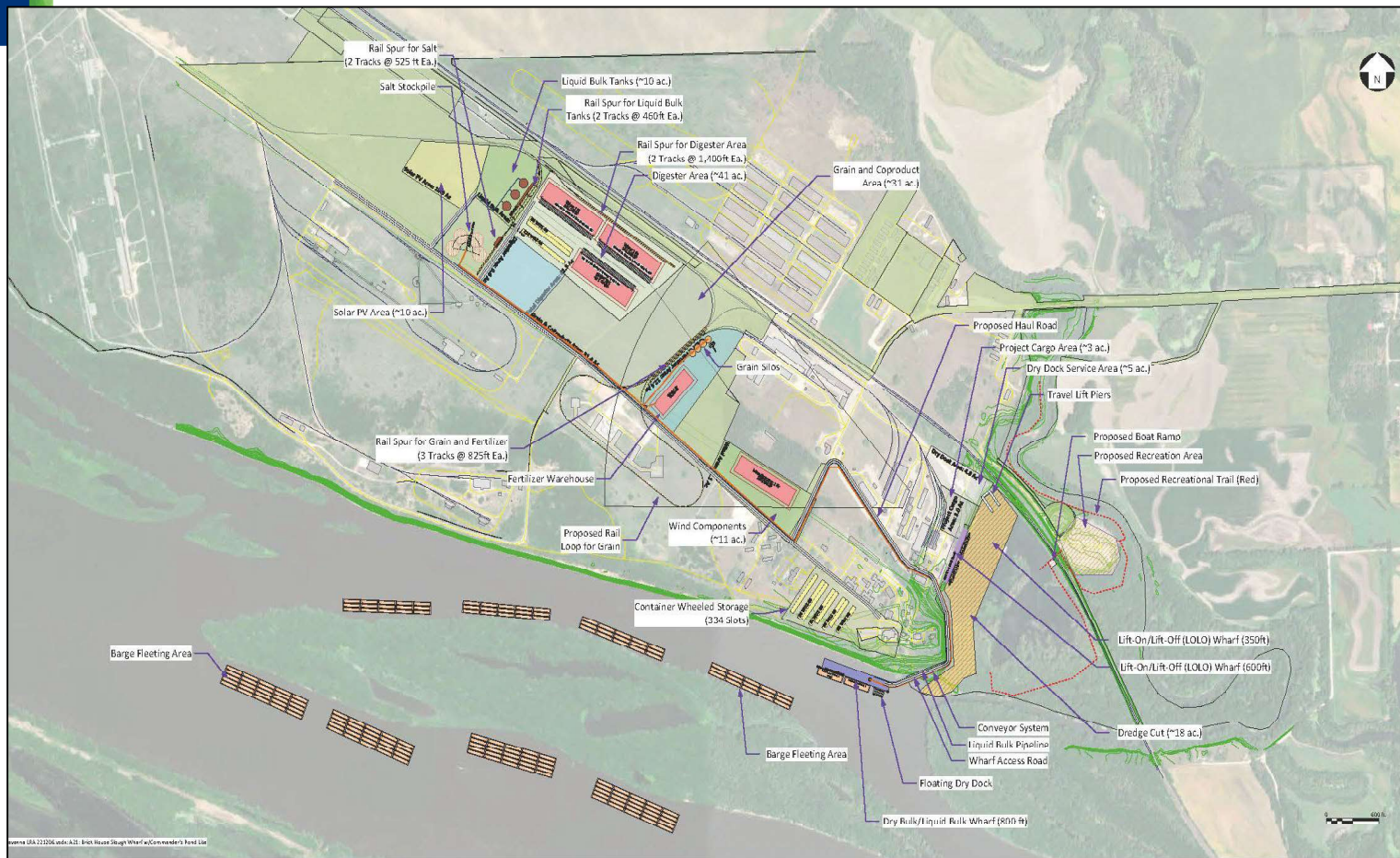


Alternative 3a: LRA Brickhouse Slough Reuse

Development Features by Alternative

800-foot x 100-foot dry and liquid bulk wharf	X
Conveyor system	X
Floating dry dock	X
Haul road	X
LOLO wharf, 350 feet	
L-shaped LOLO wharf, 600 feet x 50 feet and 290 feet x 75 feet	
Liquid bulk pipeline	X
Recreational boat ramp	X
Recreational trail	X
Recreational area or solar PV arrays atop capped landfill ^a	X
Repair fleeting area	
Travel lift piers with landside dry dock	
Wharf access road	X
Dredging (Brick House Slough and Commander's Pond) by Alternative	
Dredging (estimated acreage)	186 acres
Dredging volumes (estimated cubic yards)	
Brick House Slough	399,228
Commander's Pond dredge cut	
Commander's Pond aquatic habitat restoration area	
Cumulative dredge volume by alternative	399,228

SVADA BRAC EIS Reuse Development Alternative(s)



Alternative 3b:
LRA
Commander's
Pond Lite Reuse

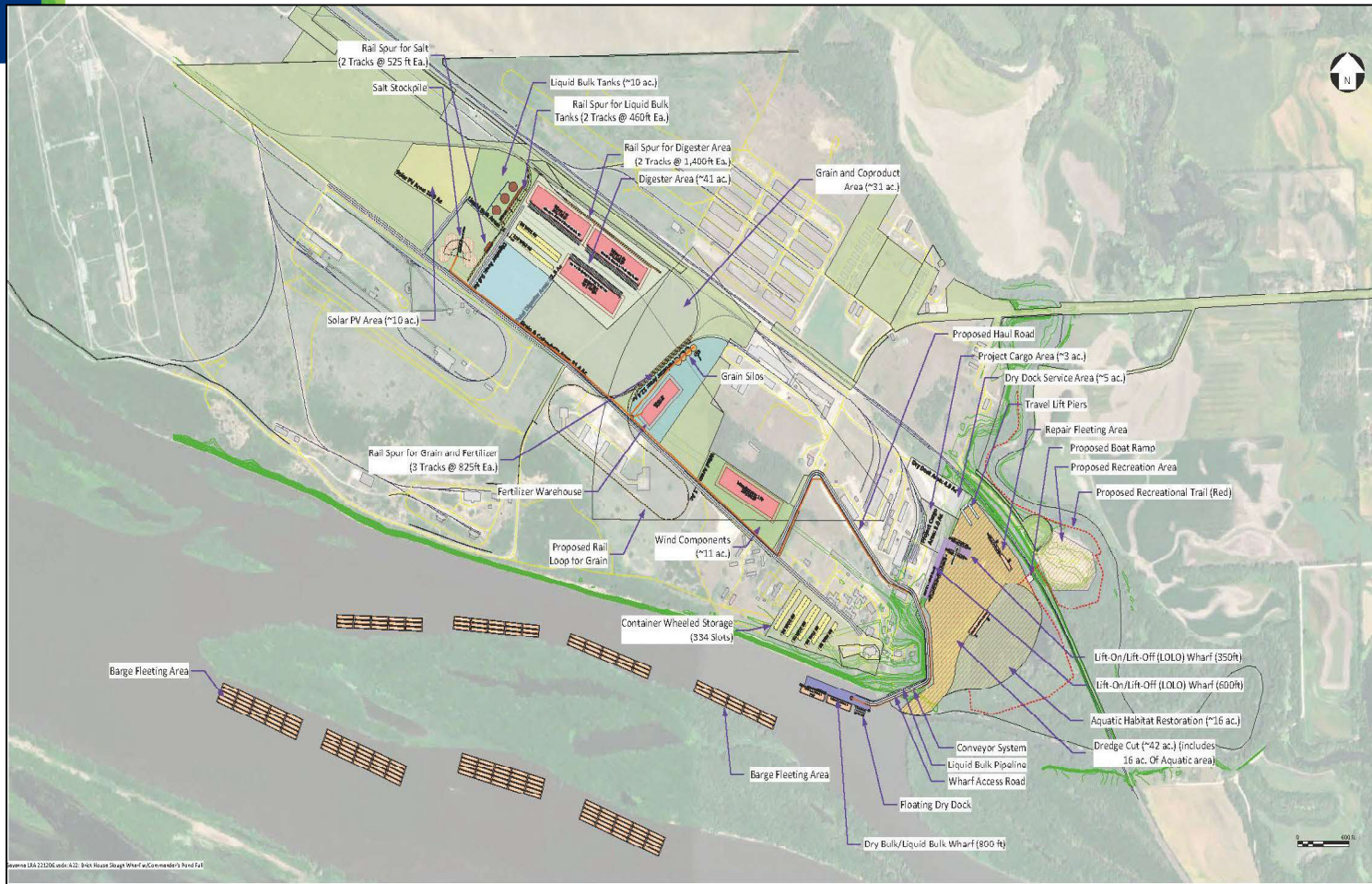
Development Features by Alternative

800-foot x 100-foot dry and liquid bulk wharf	X
Conveyor system	X
Floating dry dock	X
Haul road	X
LOLO wharf, 350 feet	
L-shaped LOLO wharf, 600 feet x 50 feet and 290 feet x 75 feet	X
Liquid bulk pipeline	X
Recreational boat ramp	X
Recreational trail	X
Recreational area or solar PV arrays atop capped landfill ^a	X
Repair fleet area	
Travel lift piers with landside dry dock	X
Wharf access road	X

Dredging (Brick House Slough and Commander's Pond) by Alternative

Dredging (estimated acreage)	18 acres
Dredging volumes (estimated cubic yards)	
Brick House Slough	399,228
Commander's Pond dredge cut	524,533
Commander's Pond aquatic habitat restoration area	
Cumulative dredge volume by alternative	923,761

SVADA BRAC EIS Reuse Development Alternative(s)



Alternative 3c: LRA Commander's Pond Full Reuse

Development Features by Alternative

800-foot x 100-foot dry and liquid bulk wharf	X
Conveyor system	X
Floating dry dock	X
Haul road	X
LOLO wharf, 350 feet	X
L-shaped LOLO wharf, 600 feet x 50 feet and 290 feet x 75 feet	X
Liquid bulk pipeline	X
Recreational boat ramp	X
Recreational trail	X
Recreational area or solar PV arrays atop capped landfill ^a	X
Repair fleet area	X
Travel lift piers with landside dry dock	X
Wharf access road	X

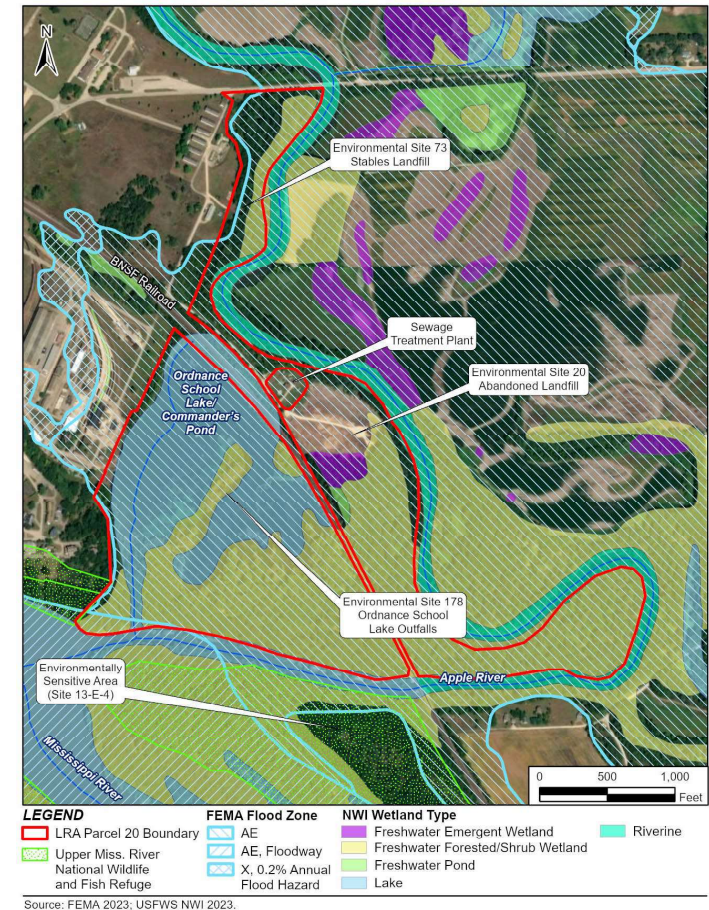
Dredging (Brick House Slough and Commander's Pond) by Alternative

Dredging (estimated acreage)	42 acres ^b
Dredging volumes (estimated cubic yards)	
Brick House Slough	399,228
Commander's Pond dredge cut	524,533
Commander's Pond aquatic habitat restoration area	313,689
Cumulative dredge volume by alternative	1,237,450

SVADA BRAC EIS, Alternatives/Actions Eliminated from Analysis

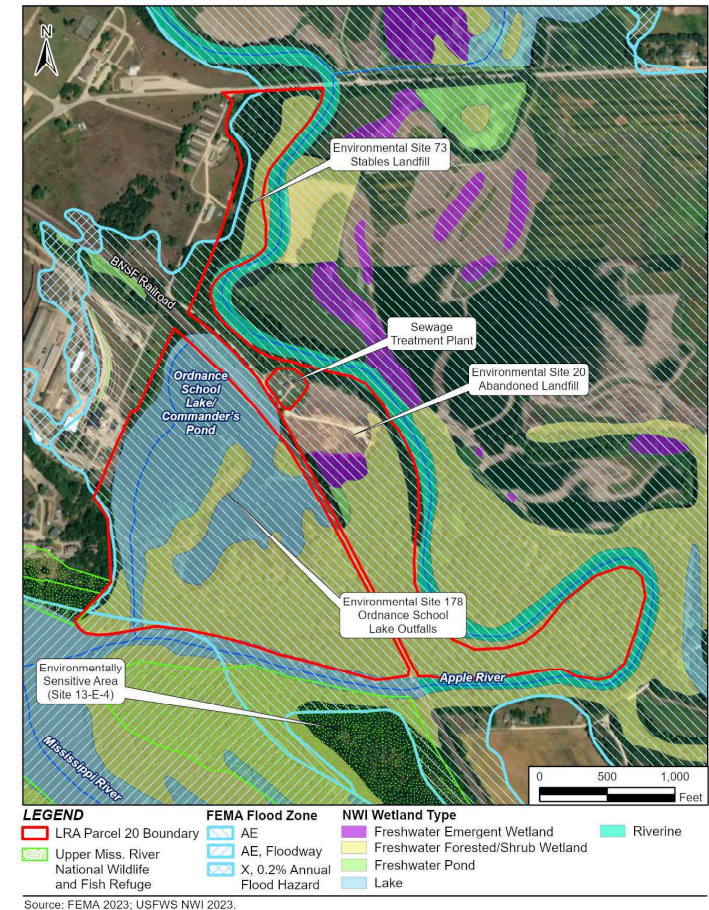
- **Eliminated from Detailed Study**

- Caretaker Status Alternative
 - Equivalent to No Action
 - Not considered a separate alternative
- Traditional Disposal Alternative
 - Requires completed environmental remediation to transfer
 - PFAS, Cleanup Site 20, Abandoned Landfill
- Cleanup Site 20, Abandoned Landfill Remediation
 - Risks of uncovering hazardous waste, methane and other gases, collapse of adjacent areas into the excavation, could jeopardize the rail line, recycling or disposing of the removed waste
 - Potentially high cost that doesn't counter risk
- Railroad Removal
 - Would violate rail right of way
 - Disrupt national rail transportation



SVADA BRAC EIS, Resources Effects

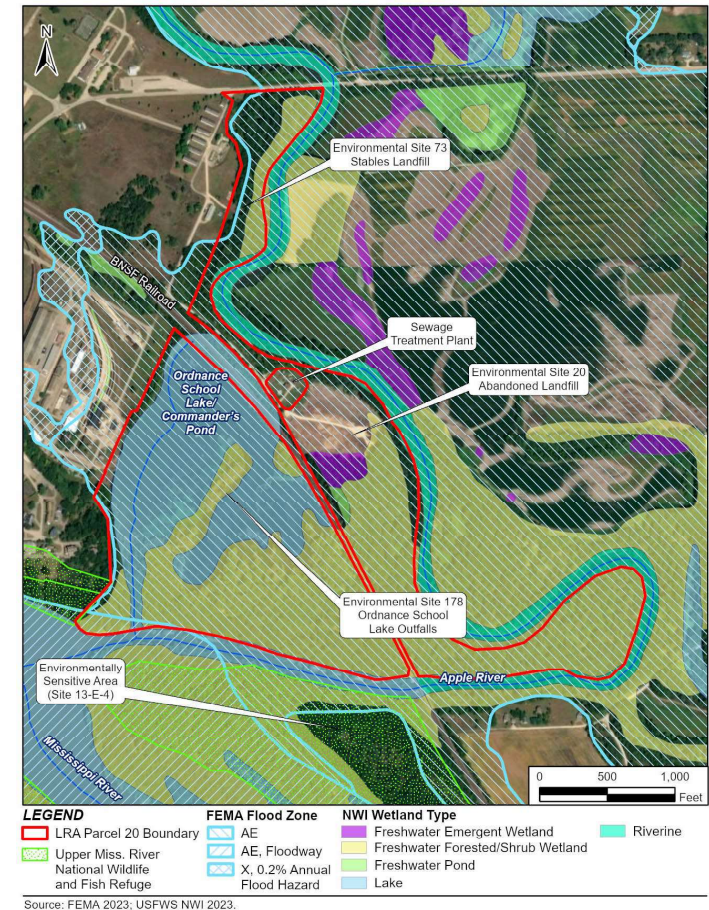
- Cultural resources protection
 - Potentially eligible sites within reuse development footprint
- Federally listed species
 - Located near reuse development footprint
- WOTUS
 - Section 404, 126.72 acres wetlands
 - Section 10, Dredge and fill in navigable waters
- Federal navigation channel
 - Section 408, Channel, navigation features
- Floodplain protection
 - Parcel 20 in 100-year floodplain
 - Carroll County floodplain ordinance, 2010
- Groundwater use prohibition
 - Groundwater use restriction at Cleanup Site 20, Abandoned Landfill
 - Formally documented in transfer documentation
 - Enforceable by State of Illinois, Uniform Environmental Covenants Act



SVADA BRAC EIS, Encumbrances

• Cleanup Site 20, Abandoned Landfill

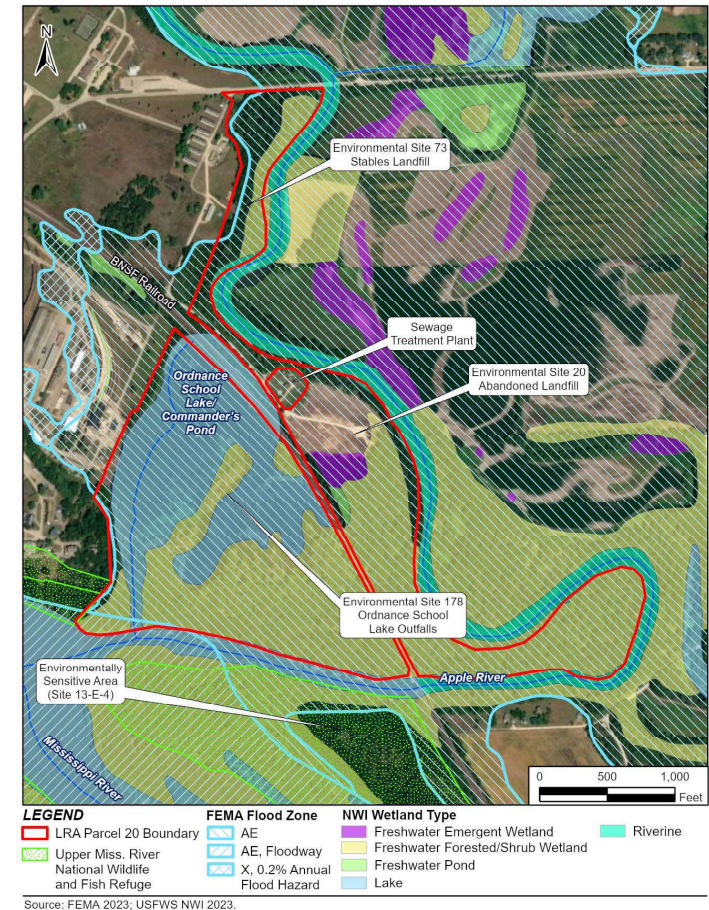
- Agricultural use, residential use, access to groundwater, and intrusive activities are prohibited at the site to prevent exposure through contact and use of surficial aquifer groundwater, unless prior written approval is obtained from the Army, U.S. Environmental Protection Agency (EPA) and Illinois Environmental Protection Agency (IEPA)
- Human receptors will be protected from contact with the soil contaminants of concern and landfill waste by maintaining the site in accordance with the landfill's operation and maintenance plan and as required by Title 35 of the Illinois Administrative Code § 811.111, *Standards for New Solid Waste Landfills, Postclosure*
- Army, EPA, and IEPA review of LUC inspections and approval processes will be maintained
- Unauthorized intrusive activity into or excavation of the landfill cap is prohibited



SVADA BRAC EIS, Encumbrances

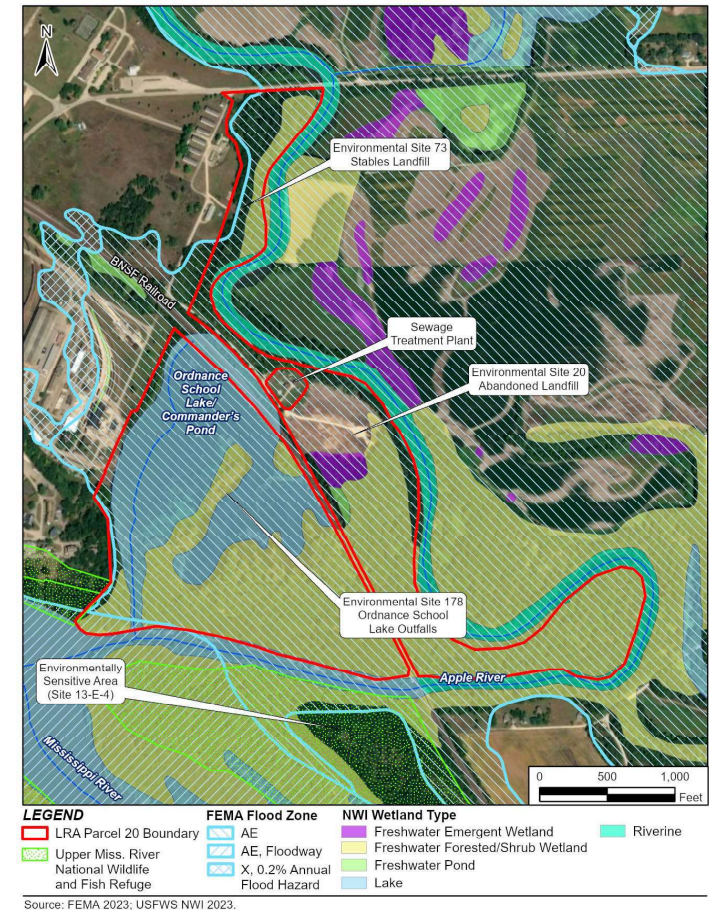
• Cleanup Site 20, Abandoned Landfill

- The vegetated, engineered landfill cap will be maintained to prevent erosion gullies and localized settlement
- The BNSF Railway right-of-way and fencing along the western boundary of the landfill site, and wetlands and the Apple River on the northeastern, eastern, and southern boundaries of the landfill site will be used to limit site access
- Signs and engineered cap delineation posts along the boundary of the landfill site will be maintained
- Encumbrances that might apply at the time of transfer or conveyance of LRA Parcel 20



SVADA BRAC EIS, Encumbrances

- **Land Use Controls (LUCs)**
 - Restrictions to protect human health and the environment
 - In perpetuity, through covenants in the land transfer document
- **Cleanup Site 178, Ordnance School Lake**
 - The environmental covenant prohibiting residential use will be maintained
- **Other encumbrances**
 - Encumbrances that might apply at the time of transfer or conveyance of LRA Parcel 20



Additional Discussion



APPENDIX J

AGENCY AND TRIBE SCOPING MEETING MINUTES

Base Realignment and Closure (BRAC) Savanna Army Depot Activity (SVADA), Illinois Environmental Impact Statement and Environmental Baseline Survey Update

Agency Meeting

Meeting Minutes

Meeting Details

PURPOSE	This meeting is meant to engage federal, state, local, and tribal agencies in the early identification of concerns, potential impacts, relevant effects of past actions and possible alternative actions.		
DATE	January 16, 2025	TIME	10:00 a.m.–12:00 p.m. CT
ORGANIZER	Beverly Hayes, Tetra Tech	LOCATION OR TYPE	Hybrid meeting with physical address at Ingersoll Wetlands Learning Center 7071 Riverview Rd, Thomson, IL 61285
ATTENDEES	<p>Headquarters Department of the Army BRAC Office (HQDA)</p> <ul style="list-style-type: none"> David Howlett, Environmental Law Division Todd Knuth, SVADA Base Environmental Coordinator Tom Lineer, BRAC Program Manager <p>U.S. Army Corps of Engineers (USACE), Mobile District</p> <ul style="list-style-type: none"> Joe Hand, Project Manager <p>USACE, Rock Island District</p> <ul style="list-style-type: none"> Brian Barnett, Real Estate Division Bethany Hoster, Environmental Planning Section Chief Kevin Landwehr, Chief of Hydraulics and Hydraulics Branch Joseph Lundh, Supervisory Natural Resources Specialist, Mississippi River Project Caitlin Mendoza, Real Estate Division Julie Rimbault, Branch Chief Regulatory Division <p>USEPA Region 5</p> <ul style="list-style-type: none"> Nicole Goers, Remedial Project Manager Kathy Kowal, Lead NEPA Reviewer Krystle McClain, NEPA Program Supervisor Natalie Romain, Community Involvement Coordinator <p>Illinois EPA</p> <ul style="list-style-type: none"> Charlene Falco, Project Manager, Federal Site Remediation section Ryan Sherman, Bureau of Water Oyetunde Stephen Tinuoye, Bureau of Water <p>Tetra Tech</p> <ul style="list-style-type: none"> Beverly Hayes, Project Manager Greg Hippert, Environmental Specialist Rowan McConville, Environmental Specialist Benjamin Richard, Environmental Specialist Rebecca Webster, Environmental Specialist <p>Illinois Department of Natural Resources (ILDNR)</p> <ul style="list-style-type: none"> Duane Ambroz, Wildlife Biologist <p>Local Redevelopment Authority (LRA)</p> <ul style="list-style-type: none"> Linda Balcom, Environmental Consultant Robert Davies, Deputy Director Steve Keefer, Chair, Board of Directors William Robinson, Member, Board of Directors Mara Roche, Executive Director Barry Steinberg, Legal Counsel <p>U.S. Fish and Wildlife Service (USFWS)</p> <ul style="list-style-type: none"> Ed Britton, District Manager 		
HANDOUTS	Slide Deck		

AGENDA ATTACHED	No	NOTETAKER	Rowan McConville, Tetra Tech
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Meeting Start

Beverly Hayes convened the meeting at 10:00 a.m. Central Time (CT).

Welcome/Introductions

General Announcements/Reminders

B. Hayes notified attendees that the meeting would be transcribed and recorded.

Topics

1. Project Overview

This project's main action is the transfer of ownership, and the secondary action is what the LRA would plan to do with the property. Everything the LRA has planned will be analyzed but once they are the new owner, the responsibility is transferred to them to carry out their plan and work with agencies, which includes the permitting process. The property cannot be transferred until the NEPA process is completed.

The project's alternatives include no action, accelerated disposal, recreation, and reuse development. The reuse development alternative, also referred to as alternative 3 is one alternative with three phases that would be completed over time. Phase 3c would still be needed to support Phases 3a and 3b.

Three Phases of Redevelopment Proposed by LRA

	Alternative 3a: LRA Brickhouse Slough Reuse	Alternative 3b: LRA Commander's Pond Lite Reuse	Alternative 3c: LRA Commander's Pond Full Reuse
Development Features by Alternative			
800-foot x 100-foot dry and liquid bulk wharf	X	X	X
Conveyor system	X	X	X
Floating dry dock	X	X	X
Haul road	X	X	X
LOLO wharf, 350 feet			X
L-shaped LOLO wharf, 600 feet x 50 feet and 290 feet x 75 feet		X	X
Liquid bulk pipeline	X	X	X
Recreational boat ramp	X	X	X
Recreational trail	X	X	X
Recreational area or solar PV arrays atop capped landfill*	X	X	X
Repair fleeting area			X
Travel lift piers with landside dry dock		X	X
Wharf access road	X	X	X

Accelerated disposal would mean that remediation by the Army would continue to occur after the land is transferred. The Army would not be able to complete remediation of PFAS detected in landfills in a timely enough manner before land transfer, which is why traditional disposal is no longer feasible. The PFAS report released last May stated that the area is one hit above the target quotient for PFAS, so some investigation and/or action is expected to be necessary. The BRAC industrial use intensity analysis will be used to analyze these alternatives.

The two recreation alternatives include walking paths, bike trails, and a kayak/canoe launch. The difference between the two is that one option has a photovoltaic solar array atop the closed landfill.

2. Property Transfer and Ownership

Attendees had multiple questions concerning where Parcel 20 ends and USACE or USFWS property begins. Caitlin Mendoza stated that minimal information is available on this area since it is currently in disposal, but she can say that Apple River Island is federally owned by USACE and managed by USFWS. She added that if there is not concurrence between USACE and USFWS, USACE would not issue an out grant.

3. Resources Effects

a. Cultural

There are two cultural sites within project boundaries, and one is close enough to the project boundary to have the potential to be affected. Some sites need further investigation to see if they qualify for the National Register of Historic Places.

There are no historic structures near the sites as of 2020, when the last cultural survey for that was conducted.

b. Biological

A biological assessment and bat surveys have been conducted on site, but no state or federal listed species have been found directly on Parcel 20 during the EIS process.

c. Water

126.72 out of 132 acres of Parcel 20 are wetlands. There is a groundwater use restriction at Cleanup Site 20, abandoned landfill which is formally documented in transfer documentation and enforceable by the state of Illinois Uniform Environmental Covenants Act.

d. Navigation Impacts

USACE navigation facilities may be affected by development. It looks like the wing dam north of Apple Island would be impacted by development in the Brickhouse Slough area. Kevin Landwehr expressed space concerns with fleeting and the wing dam going near one another. Barge fleeting on the west side of Apple Island could also pose an issue.

4. Agency Concerns

a. Navigation

Joseph Lundh stated that the potential that reuse development could impact the main channel of the Mississippi River is a concern. There is a master plan USACE has that allocates how development happens that would be consulted for compliance.

b. Dredging

Mara Roche stated that the LRA's plan for dredge management would be to dewater and store on site in the cantonment area. Nicole Goers suggested that a transportation plan for where to bring contaminated material will likely be needed.

c. Roads

K. Kowal stated that road conditions need to be evaluated if a significant increase in traffic is expected and that The Illinois Department of Transportation and the Federal Highway Commission should also be partners to the EIS.

d. Railroad

The railroad will be given the opportunity to give their input but there is no plan to impact their right of way or their work. Railroad operations would be expected to increase due to the proposed intermodal transportation hub being put in place.

e. Area Outside of Parcel 20

Ed Britton asked why the Army is responsible for the area outside of Parcel 20. Thomas Lineer explained that this is due to the “and but” concept of NEPA where the Army is required to cover indirect, direct, and cumulative effects. David Howlett added that Direct impacts are what’s happening at Parcel 20. Indirect impacts are outside of Parcel 20. Cumulative would be these impacts combined with if someone else was working on a Mississippi River project. There will be follow-up action for getting permission to use Apple Island and the Mississippi River, and to address any endangered species. While the construction on Parcel 20 is in three phases, the EIS team is looking at one set of impacts on the Mississippi River and Apple Island.

f. Munitions and Explosives of Concern (MEC)

N. Goers expressed concern about the possibility of MEC on Parcel 20 given the area’s history. Todd Knuth explained that the entire installation has been searched for munitions and there were no findings at Parcel 20. Commander’s Pond used to be called Ordnance Lake because it was next to an ordnance school. The land use control implementation plan should be ready by summer and is being done in-house by USACE.

5. New Topics/Information

K. Kowal emphasized the importance of maintaining ongoing communication with the public to clarify the lengthy NEPA process. The group discussed the possibility of hosting regular monthly meetings to address ongoing questions and improve public understanding of the project’s timeline and requirements. A USACE public affairs officer will serve as the point of contact for public affairs related to this project. Additionally, there was a suggestion to provide agencies with an administrative copy of the EIS for review before it is released for the comment period, which could help reduce the number of comments received. K. Kowal also proposed a monthly newsletter for interested members of the public.

Takeaways

The main takeaway from this discussion is that there is currently not enough information. There is less concern about the transfer of Parcel 20 than its potential reuse. Several agencies believe it would be appropriate to conduct supplemental analysis in the future to supplement a permit finding. The Army will be making some decisions on outreach and additional public engagement. There will be an opportunity to see the Draft EIS this fall. Additionally, there has been mention of the possibility of agencies becoming cooperating agencies. If any agencies are interested in this opportunity, please reach out to the EIS team.

Meeting Close/Date for Next Meeting

B. Hayes adjourned the meeting at 1:18 p.m. CT.

APPENDIX K

PUBLIC SCOPING MEETING SIGN-IN SHEETS

Attendee Roster – BRAC SVADA LRA Parcel 20 Public Scoping Meeting

January 16, 2025 · 5:00 p.m. – 6:30 p.m. · West Carroll High School, 500 Cragmoor Street, Savanna, Illinois

If you wish to have your name added to the project mailing list and listed in the project administrative record, please enter your name and address below.

CEQ Unique Identifier: EISX-007-21-000-1729699335

Name: NICOLE GOERS

Organization: _____

Address: _____

City, State, ZIP: CHICAGO, IL 60604

Phone: _____

E-mail: _____

.....

Name: Tonya^{Scott} Werner

Organization: _____

Address: _____

City, State, ZIP: Savanna IL

Phone: _____

E-mail: _____

.....

Name: MICHAEL POTEMPA

Organization: KACHING GLOBAL

Address: _____

City, State, ZIP: FREDPORT, IL 61032

Phone: _____

E-mail: _____

Name: Colleen Fox

Organization: River Ridge CUSD 210

Address: _____

City, State, ZIP: Hanover, IL 61041

Phone: _____

E-mail: _____

.....

Name: Jaicee Buckner

Organization: Carroll County

Address: _____

City, State, ZIP: Mt Carroll, IL 61053

Phone: _____

E-mail: _____

.....

Name: John A Schultz

Organization: Jo Daviess County Board

Address: _____

City, State, ZIP: Galena IL 61036

Phone: _____

E-mail: _____

Attendee Roster – BRAC SVADA LRA Parcel 20 Public Scoping Meeting

January 16, 2025 · 5:00 p.m. – 6:30 p.m. · West Carroll High School, 500 Cragmoor Street, Savanna, Illinois

If you wish to have your name added to the project mailing list and listed in the project administrative record, please enter your name and address below.

CEQ Unique Identifier: EISX-007-21-000-1729699335

Name: Kim Falk

Organization: _____

Address: _____

City, State, ZIP: Savanna IL 61074

Phone: _____

E-mail: _____

.....
Name: Beth Weber

Organization: State of IL

Address: _____

City, State, ZIP: Savanna IL 61074

Phone: _____

E-mail: _____

.....
Name: Susan Jacobs

Organization: Carroll County Board

Address: _____

City, State, ZIP: Mount Carroll IL 61053

Phone: _____

E-mail: _____

Name: Kolton Kramer

Organization: _____

Address: _____

City, State, ZIP: Mt. Carroll, IL, 61053

Phone: _____

E-mail: _____

.....
Name: Amiee Martelle

Organization: Riverport Railroad LLC

Address: _____

City, State, ZIP: Savanna IL 61074

Phone: _____

E-mail: _____

.....
Name: Erica Schan

Organization: _____

Address: _____

City, State, ZIP: Savanna IL 61074

Phone: _____

E-mail: _____

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If you wish to have your name added to the project mailing list and listed in the project administrative record, please enter your name and address below.

CEQ Unique Identifier: EISX-007-21-000-1729699335

Name: Chris Falk

Organization: _____

Address: _____

City, State, ZIP: Savanna, IL 61074

Phone: _____

E-mail: _____

Name: Jo Carey

Organization: Savanna Township

Address: _____

City, State, ZIP: Savanna IL 61074

Phone: _____

E-mail: _____

Name: Michael Wilk

Organization: Jo Daviess County EMA

Address: _____

City, State, ZIP: Hanover IL 61041

Phone: _____

E-mail: _____

Name: Kevin Reibel

Organization: LRA Board

Address: _____

City, State, ZIP: Savanna, IL 61074

Phone: _____

E-mail: _____

Name: Steve Keffer

Organization: Jo Carroll LRA

Address: _____

City, State, ZIP: Hanover IL 61041

Phone: _____

E-mail: _____

Name: Brian Potempa & Michael Potempa

Organization: Ka-Ching Global

Address: _____

City, State, ZIP: Freeport IL 61032

Phone: _____

E-mail: _____

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CEQ Unique Identifier: EISX-007-21-000-1729699335

Name: DAVID SOLDAT
Organization: RETIRED - CARROLL COUNTY BOARD
Address: [REDACTED]
City, State, ZIP: [REDACTED]
Phone: [REDACTED]
E-mail: [REDACTED]

.....
Name: Julie Brigham
Organization: Washington Township
Address: [REDACTED]
City, State, ZIP: Savanna, IL 61074
Phone: [REDACTED]
E-mail: [REDACTED]

.....
Name: KRYSTLE MCCLAREN
Organization: US EPA
Address: [REDACTED]
City, State, ZIP: CHICAGO, IL 60606
Phone: [REDACTED]
E-mail: [REDACTED]

Name: SARA RENKES
Organization: Carroll County Highway
Address: [REDACTED]
City, State, ZIP: IANARK IL
Phone: [REDACTED]
E-mail: [REDACTED]

.....
Name: Bob Jachnick
Organization: Carroll County
Address: [REDACTED]
City, State, ZIP: MT. CARROLL, IL 61053
Phone: [REDACTED]
E-mail: [REDACTED]

.....
Name: Ed Juracek
Organization: Blackhawk Hills Reg. Council
Address: [REDACTED]
City, State, ZIP: Savanna, IL 61074
Phone: [REDACTED]
E-mail: [REDACTED]

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If you wish to have your name added to the project mailing list and listed in the project administrative record, please enter your name and address below.

CEQ Unique Identifier: EISX-007-21-000-1729699335

Name: Tom Lundy
Organization: _____
Address: [REDACTED]
City, State, ZIP: Savanna IL 61074
Phone: [REDACTED]
E-mail: _____

.....

Name: Melinda Appel
Organization: _____
Address: [REDACTED]
City, State, ZIP: Thomson IL 61285
Phone: [REDACTED]
E-mail: [REDACTED]

.....

Name: Richard Siedenburg
Organization: Carroll County SWCD
Address: [REDACTED]
City, State, ZIP: Savanna, IL 61074
Phone: [REDACTED]
E-mail: [REDACTED]

Name: JEFF GRISWOLD
Organization: CITY OF SAVANNA
Address: [REDACTED]
City, State, ZIP: SAVANNA, IL 61074
Phone: _____
E-mail: _____

.....

Name: Natalie Romain
Organization: USEPA
Address: _____
City, State, ZIP: Chicago, IL
Phone: [REDACTED]
E-mail: [REDACTED]

.....

Name: Val Gunnarsson
Organization: City of Savanna
Address: [REDACTED]
City, State, ZIP: Savanna
Phone: [REDACTED]
E-mail: [REDACTED]

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January 16, 2025 · 5:00 p.m. – 6:30 p.m. · West Carroll High School, 500 Cragmoor Street, Savanna, Illinois

If you wish to have your name added to the project mailing list and listed in the project administrative record, please enter your name and address below.

CEQ Unique Identifier: EISX-007-21-000-1729699335

Name: Joe Deckert
Organization: The Depot Resort & RV Park
Address: [REDACTED]
City, State, ZIP: Savanna, IL 61074
Phone: [REDACTED]
E-mail: [REDACTED]

.....

Name: Joe Deckert
Organization: THE DEPOT RESORT & RV PARK
Address: [REDACTED]
City, State, ZIP: SAVANNA IL 61074
Phone: [REDACTED]
E-mail: [REDACTED]

.....

Name: Julie Bickelhaupt
Organization: Carroll County Board
Address: [REDACTED]
City, State, ZIP: Wt. Carroll, IL 61053
Phone: [REDACTED]
E-mail: [REDACTED]

Name: Ronald H. Smith
Organization: LRA
Address: [REDACTED]
City, State, ZIP: GALENA IL 61036
Phone: [REDACTED]
E-mail: [REDACTED]

.....

Name: RAWBY NYBOCK
Organization: [REDACTED]
Address: [REDACTED]
City, State, ZIP: MORRISON, IL 61270
Phone: [REDACTED]
E-mail: [REDACTED]

.....

Name: Bill Rohman
Organization: LRA
Address: [REDACTED]
City, State, ZIP: Savanna, IL 61074
Phone: [REDACTED]
E-mail: [REDACTED]

January 16, 2025 · 5:00 p.m. – 6:30 p.m. · West Carroll High School, 500 Cragmoor Street, Savanna, Illinois

CEQ Unique Identifier: EISX-007-21-000-1729699335

Your information will not be used for any purpose other than to provide you a link to a digital copy of the EIS.

Attendee Roster – BRAC SVADA LRA Parcel 20 Public Scoping Meeting

January 16, 2025 · 5:00 p.m. – 6:30 p.m. · West Carroll High School, 500 Cragmoor Street, Savanna, Illinois

If you wish to have your name added to the project mailing list and listed in the project administrative record, please enter your name and address below.

CEQ Unique Identifier: EISX-007-21-000-1729699335

Name: Ed Britton
Organization: USFWS
Address: [REDACTED]
City, State, ZIP: Thonson IL 61285
Phone: [REDACTED]
E-mail: [REDACTED]

.....

Name: _____
Organization: _____
Address: _____
City, State, ZIP: _____
Phone: _____
E-mail: _____

.....

Name: _____
Organization: _____
Address: _____
City, State, ZIP: _____
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E-mail: _____

Name: _____
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Address: _____
City, State, ZIP: _____
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Name: _____
Organization: _____
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City, State, ZIP: _____
Phone: _____
E-mail: _____

.....

Name: _____
Organization: _____
Address: _____
City, State, ZIP: _____
Phone: _____
E-mail: _____

APPENDIX L

PUBLIC SCOPING MEETING FACT SHEET

PUBLIC MEETING

Environmental Impact Statement Disposal and Reuse of LRA Parcel 20 Savanna Army Depot Activity Carroll and Jo Daviess Counties, IL

January 16, 2025

CEQ Unique Identifier: EISX-007-21-000-1729699335

PURPOSE: IDENTIFY CONCERNS ABOUT THE SVADA LRA PARCEL 20 ACTION UNDER THE NATIONAL ENVIRONMENTAL POLICY ACT (NEPA)



The Department of the Army is preparing an Environmental Impact Statement (EIS) to assess the potential effects on the human and natural

environments associated with the disposal and reuse of the 132-acre LRA Parcel 20 on Savanna Army Depot Activity (SVADA).

Submit comments during this public involvement process for consideration in the EIS by:

- Submitting a written comment at this meeting.
- Making an oral comment to the court reporter at this meeting.
- Emailing comments to SVADAEIS@tetrattech.com.
- Mailing comments via U.S. mail to:
SVADA EIS c/o Tetra Tech
107 St. Francis St., Suite 2370
Mobile, AL 36602

Comments will be accepted anytime but submission no later than 30 days from the date of this meeting will ensure your comment is considered during the NEPA analysis. ► ► ►

The EIS will evaluate the following alternatives:

- Proposed Action: The Army's disposal of LRA Parcel 20 by transfer to the LRA or other appropriate recipient.
- No Action: The Army retains LRA Parcel 20 in caretaker status.
- LRA Reuse: Three alternatives to create a port facility, recreational facilities, and potentially solar facilities.
- Other Reuse: Recreation facilities only, or recreation and solar facilities.

Project website:

<https://www.lrd.usace.army.mil/Submit-ArticleCS/Programs/Article/3901394/>

For inquiries please contact:

Mr. Joseph Hand
USACE, Mobile District
Phone: 251-694-3881
Email: joseph.h.hand@usace.army.mil

APPENDIX M
PUBLIC SCOPING MEETING COMMENT FORM

Base Realignment and Closure Savanna Army Depot Activity
LRA Parcel 20 Environmental Impact Statement
CEQ Unique Identifier: EISX-007-21-000-1729699335

Public Scoping Comment Form

Scoping comments should be submitted by February 15, 2025

Comments can be submitted by email to:
SVADAEIS@tetrattech.com

or
By U.S. mail to:
**SVADA EIS c/o Tetra Tech
107 St. Francis Street, Suite 2370
Mobile, AL 36602**

Name:

Organization:

Address:

Email:

Affiliation (please check a box):

- | | |
|---|---|
| <input type="checkbox"/> Elected Official | <input type="checkbox"/> Business/commercial organization |
| <input type="checkbox"/> Local government | <input type="checkbox"/> Historic preservation organization |
| <input type="checkbox"/> State government | <input type="checkbox"/> Nongovernmental organization |
| <input type="checkbox"/> Federal government | <input type="checkbox"/> Private citizen |
| <input type="checkbox"/> Native American Tribe/organization | <input type="checkbox"/> Other: _____ |

Please check the box next to the topic area(s) that you have comments/concerns about and write your comment on the reverse.

- | | |
|--|--|
| <input type="checkbox"/> Aesthetics and visual resources | <input type="checkbox"/> NEPA |
| <input type="checkbox"/> Air quality/climate | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Biological resources | <input type="checkbox"/> Proposed action or alternatives |
| <input type="checkbox"/> Coordination/communication | <input type="checkbox"/> Socioeconomics |
| <input type="checkbox"/> Cultural and historic resources | <input type="checkbox"/> Traffic/transportation |
| <input type="checkbox"/> Cumulative effects | <input type="checkbox"/> Utilities and infrastructure |
| <input type="checkbox"/> Environmental justice/children | <input type="checkbox"/> Water resources |
| <input type="checkbox"/> Geology and soils | <input type="checkbox"/> General Support |
| <input type="checkbox"/> Hazardous materials and waste | <input type="checkbox"/> General Opposition |
| <input type="checkbox"/> Land use | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Mitigation | _____ |
| <input type="checkbox"/> Navigation | _____ |

For more information regarding this project visit:
<https://www.lrd.usace.army.mil/Submit-ArticleCS/Programs/Article/3901394/>

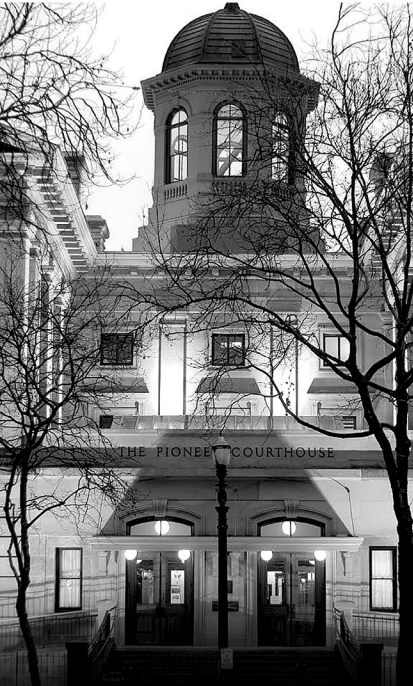
Base Realignment and Closure Savanna Army Depot Activity
LRA Parcel 20 Environmental Impact Statement
CEQ Unique Identifier: EISX-007-21-000-1729699335

[illegible]

Thank you for your comments.

For more information regarding this project visit:
<https://www.lrd.usace.army.mil/Submit-ArticleCS/Programs/Article/3901394/>

APPENDIX N
PUBLIC SCOPING MEETING COURT REPORTER
TRANSCRIPT



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SAVANNA ARMY DEPOT ACTIVITY
ENVIRONMENTAL IMPACT STATEMENT

TRANSCRIPT OF
SCOPING MEETING

HELD VIA ZOOM ON
THURSDAY, JANUARY 16, 2025
5:22 P.M.

HELD AT
WEST CARROLL HIGH SCHOOL AUDITORIUM
500 CRAGMOOR STREET
SAVANNA, ILLINOIS 61074

REMOTE APPEARANCES

Rowan McConville

Sara Renkes

Julie Bickelhaupt

Erika Schau

Elizabeth Grissinger

Ronald H. Smith

Mark Nilson, Naegeli Technician

TRANSCRIPT OF
SCOPING MEETING
HELD VIA ZOOM ON
THURSDAY, JANUARY 16, 2025
5:22 P.M.

ROWAN MCCONVILLE: So we'll just ask you to state your name beforehand and spell it out for us.

SARA RENKES: Okay.

ROWAN MCCONVILLE: And, Myriam, are you ready?

THE REPORTER: I am sorry. I didn't hear you. I'm ready.

ROWAN MCCONVILLE: We've got someone ready to make a comment. Are you ready?

THE REPORTER: I am ready. Please go ahead.

Please state your full name and spell it.

SARA RENKES: Okay. My name is Sara Renkes, S-A-R-A, R-E-N-K-E-S. So the last name is R-E-N-K-E-S. Yes.

THE REPORTER: Thank you.

SARA RENKES: Yeah.

ROWAN MCCONVILLE: There's a chair if

1 you'd like to sit. Sorry.

2 SARA RENKES: No, you're good.

3 I just wanted to state my support for the
4 LRA's Economic Development Plan, and would like to
5 have the Army support in helping them facilitate
6 that plan. The second comment I would like to make
7 is if any extra funding could be obtained for the
8 infrastructure to that area. And I think that's --
9 that's all I have.

10 ROWAN MCCONVILLE: Thank you so much.

11 SARA RENKES: Thank you very much. Yes.

12 ROWAN MCCONVILLE: I appreciate it.

13 (WHEREUPON, a discussion was held off the
14 record.)

15 ROWAN MCCONVILLE: Okay. So we have our
16 court reporter here, remotely.

17 JULIE BICKELHAUPT: Okay.

18 ROWAN MCCONVILLE: And we'll just ask you
19 to state your full name first, spell it out, and
20 then give us your comment. And then I'm also
21 recording just in case you know any --

22 JULIE BICKELHAUPT: Yes, technical
23 difficulties.

24 ROWAN MCCONVILLE: -- technical
25 difficulty. So --

1 JULIE BICKELHAUPT: All right. I am Julie
2 Bickelhaupt. J-U-L-I-E. B as in boy, I-C-K-E-L-H-
3 A-U, P as in Paul, T as in Thomas. I am from Mount
4 Carroll. I am the county board chair.

5 I think the biggest thing I'm seeing from
6 being here, talking with the LRA and the -- the Port
7 Authority is, I would like to see some economic
8 growth for the area as well, you know, for the towns
9 that surround it, but also for the county or
10 counties potentially. That would be a very good
11 thing for our area. And that space, it would be
12 wonderful if we could use it for something that
13 could create economic growth

14 So that's pretty much what I feel, and I
15 would like to see the most out of it. I'm sure
16 there's some other options that could come along
17 with it, but, you know, see that it benefits and
18 provides stability through the area.

19 ROWAN MCCONVILLE: Okay. Great. Thank
20 you so much.

21 JULIE BICKELHAUPT: All right. Thank you.

22 ROWAN MCCONVILLE: Have a good evening.

23 JULIE BICKELHAUPT: You too.

24 (WHEREUPON, a discussion was held off the
25 record.)

1 ROWAN MCCONVILLE: Okay. So what we will
2 ask you to do is we'll just have you state your full
3 name and then spell it out for us.

4 ERIKA SCHAU: Okay.

5 ROWAN MCCONVILLE: And then you can let a
6 read.

7 ERIKA SCHAU: Okay.

8 ROWAN MCCONVILLE: And I'll also be
9 recording just in case we have any technical --

10 ERIKA SCHAU: Sure.

11 ROWAN MCCONVILLE: -- difficulties. So
12 you're free to go.

13 ERIKA SCHAU: Okay. My name is Erika
14 Schau, E-R-I-C-A, S-C-H-A-U.

15 And my first concern is the condition of
16 Army Depot Road itself. Right now there is a lot of
17 traffic with the grain bins back there. So, you
18 know, spring, fall, all throughout the year, every
19 day there's lots of trucks and that road is
20 horrendous. And the patchwork just does not -- it
21 does not work. It doesn't last. It may last a
22 month or two and then it just crumbles.

23 My second is, with the -- all the dredging
24 that would go on with putting barges back there, the
25 environmental impact and the impact that it has.

1 There's -- there's several people that live right
2 along the Mississippi River, like in the backwaters
3 right back there. So there's a -- I mean it's
4 really -- it's just so quiet and peaceful and I
5 think it would be detrimental to our environment. I
6 think that's all comments I had.

7 ROWAN MCCONVILLE: Okay. Great. Thank
8 you so much for your comment.

9 ERIKA SCHAU: You bet.

10 ROWAN MCCONVILLE: Great. Have a great
11 evening.

12 ERIKA SCHAU: Thanks. You too.

13 ROWAN MCCONVILLE: Thank you so much for
14 coming out.

15 ERIKA SCHAU: Yeah.

16 ROWAN MCCONVILLE: All good?

17 THE REPORTER: Excellent job you're doing.

18 (WHEREUPON, a discussion was held off the
19 record.)

20 ROWAN MCCONVILLE: If you just have a seat
21 and give us your full name.

22 ELIZABETH GRISSINGER: Okay.

23 ROWAN MCCONVILLE: And spell it for us and
24 then you can let a read.

25 ELIZABETH GRISSINGER: It's not bad. It's

--

ROWAN MCCONVILLE: No, no. Just --

ELIZABETH GRISSINGER: Okay.

ROWAN MCCONVILLE: -- we're ready for you.

ELIZABETH GRISSINGER: Okay.

ROWAN MCCONVILLE: Mm-hmm.

ELIZABETH GRISSINGER: Elizabeth
Grissinger.

ROWAN MCCONVILLE: Mm-hmm. Spell it.
Yes, ma'am.

ELIZABETH GRISSINGER: E-L-I-Z-A-B-E-T-H,
G-R-I-S-S-I-N-G-E-R.

And my comment is with all the flooding
that has happened all of these many, many years with
Apple River and of course the Mississippi overflows
and then Apple River overflows. But I see potential
where the Commander's Lake could be dredged out
deeper.

And that would allow for overflow, which
in turn would help the residents along the Army
Depot Road that currently own property, the farmer,
and the other resident that lives there, possibly
would have less flooding in the future.

ROWAN MCCONVILLE: Okay. Great. Thank
you so much for your comment. Thank you for coming

1 out this evening.

2 Are we all good over there?

3 THE REPORTER: Yes. Perfect. Thank you.

4 ROWAN MCCONVILLE: Good deal. Okay.

5 Let me go see if I can bring anybody else
6 in.

7 THE REPORTER: Mm-hmm.

8 (WHEREUPON, a discussion was held off the
9 record.)

10 ROWAN MCCONVILLE: Have a seat. So you'll
11 just tell us what you think. So what we'll have you
12 do is you'll tell us your full name and then you'll
13 spell it out for us and then you'll give us your
14 comment.

15 RONALD H. SMITH: Okay.

16 ROWAN MCCONVILLE: Right. We're ready for
17 you.

18 RONALD H. SMITH: Okay. My name's Ronald.
19 My middle initial is H. Smith. I live in Jo Daviess
20 County, Galena, Illinois. I'm on the LRA Board.
21 I've been on it for many years, and so I've been
22 involved in a lot of projects down there like this
23 one here now.

24 And I'm definitely in favor. I'm glad now
25 that we're looking at these parcels and being able

1 to get those and develop them. We did a study on
2 that parcel 20, this is the -- back in June of 2023.
3 And it spells out here by each area what it has and
4 everything.

5 And it all turned out real positive
6 release because years ago, you know, we used to have
7 the riverfront and then we didn't -- we didn't get
8 that or we lost that because they were going to
9 build a prison there. So fish and wildlife had land
10 internally, so they -- we had a trade and they took
11 over the riverfront.

12 And then the LRA got that property there
13 and that's where the prison was supposed to go, but
14 then it got built down -- down below. I think so.
15 But definitely we got a good board and the people
16 working on some of these things that were economic
17 development and with the opportunity at the railroad
18 and the water there yet, you got to get access to
19 that.

20 Because when you can ship grain by bulk
21 barges, it's more -- well, they say it's edible than
22 by some of the trucks. I never knew that before.
23 Yeah. So really that's all I have to say. We got a
24 good organization. It's good people working. Now
25 with the Port Authority working with us too, that's

1 good that that's going forward.

2 ROWAN MCCONVILLE: Right.

3 RONALD H. SMITH: They got a lot of power,
4 access to money, and do things and take over things.

5 ROWAN MCCONVILLE: Yes, sir.

6 RONALD H. SMITH: Okay. Thank you for
7 doing what you're doing.

8 ROWAN MCCONVILLE: Thank you so much for
9 your comment and thank you for coming this evening.

10 (WHEREUPON, a discussion was held off the
11 record.)

12 ROWAN MCCONVILLE: Doing last call now,
13 but should be wrapping up.

14 THE REPORTER: No problem.

15 Thank you.

16 (WHEREUPON, a discussion was held off the
17 record.)

18 ROWAN MCCONVILLE: All right. Well we're
19 going to call it an evening. Thank you so much for
20 your help.

21 THE REPORTER: Of course.

22 You're welcome.

23 Thank you as well.

24 Have a great evening now.

25 ROWAN MCCONVILLE: You too.

1 Bye.

2 THE REPORTER: Thanks.

3 Bye, Rowan.

4 Take care.

5 (WHEREUPON, the SCOPING MEETING concluded
6 at 6:31 p.m.)

CERTIFICATE

I, Myriam Joho Papadopoulos, do hereby certify that I reported all proceedings adduced in the foregoing matter and that the foregoing transcript pages constitutes a full, true and accurate record of said proceedings to the best of my ability.

I further certify that I am neither related to counsel or any party to the proceedings nor have any interest in the outcome of the proceedings.

IN WITNESS HEREOF, I have hereunto set my hand this 30th of January, 2025.

A handwritten signature in dark ink, appearing to read 'Myriam', is written over a faint, circular embossed seal. The signature is fluid and cursive.

Myriam Joho Papadopoulos, #2357

1	bad 7:25	counties 5:10	8:3,5,7,11
16 3:4	barges 6:24 10:21	county 5:4,9 9:20	environment 7:5
2	benefits 5:17	court 4:16	environmental 6:25
20 10:2	bet 7:9	create 5:13	Erika 6:4,7,10,13 7:9,12,15
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2025 3:4	biggest 5:5	D	Excellent 7:17
5	bins 6:17	Daviess 9:19	extra 4:7
5:22 3:5	board 5:4 9:20 10:15	day 6:19	F
6	boy 5:2	deal 9:4	facilitate 4:5
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A	build 10:9	Depot 6:16 8:21	farmer 8:21
A-U 5:3	built 10:14	detrimental 7:5	favor 9:24
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ahead 3:18	bulk 10:20	development 4:4 10:17	fish 10:9
Apple 8:15,16	Bye 12:1,3	difficulties 4:23 6:11	flooding 8:13,23
area 4:8 5:8,11,18 10:3	C	difficulty 4:25	forward 11:1
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	comment 3:16 4:6,20 7:8 8:13, 25 9:14 11:9	economic 4:4 5:7,13 10:16	Galena 9:20
	comments 7:6	edible 10:21	give 4:20 7:21 9:13
	concern 6:15	Elizabeth 7:22,25	glad 9:24
	concluded 12:5		
	condition 6:15		

<p>good 4:2 5:10,22 7:16 9:2,4 10:15, 24 11:1</p> <p>grain 6:17 10:20</p> <p>great 5:19 7:7,10 8:24 11:24</p> <p>Grissinger 7:22, 25 8:3,5,7,8,11</p> <p>growth 5:8,13</p> <hr/> <p>H</p> <hr/> <p>happened 8:14</p> <p>hear 3:13</p> <p>held 3:3 4:13 5:24 7:18 9:8 11:10,16</p> <p>helping 4:5</p> <p>horrendous 6:20</p> <hr/> <p>I</p> <hr/> <p>I-C-K-E-L-H- 5:2</p> <p>Illinois 9:20</p> <p>impact 6:25</p> <p>infrastructure 4:8</p> <p>initial 9:19</p> <p>internally 10:10</p> <p>involved 9:22</p> <hr/> <p>J</p> <hr/> <p>J-U-L-I-E 5:2</p> <p>JANUARY 3:4</p> <p>Jo 9:19</p> <p>job 7:17</p>	<p>Julie 4:17,22 5:1, 21,23</p> <p>June 10:2</p> <hr/> <p>K</p> <hr/> <p>knew 10:22</p> <hr/> <p>L</p> <hr/> <p>Lake 8:17</p> <p>land 10:9</p> <p>live 7:1 9:19</p> <p>lives 8:22</p> <p>lost 10:8</p> <p>lot 6:16 9:22 11:3</p> <p>lots 6:19</p> <p>LRA 5:6 9:20 10:12</p> <p>LRA's 4:4</p> <hr/> <p>M</p> <hr/> <p>make 3:16 4:6</p> <p>MCCONVILLE 3:7,11,15,25 4:10,12,15,18,24 5:19,22 6:1,5,8, 11 7:7,10,13,16, 20,23 8:2,4,6,9, 24 9:4,10,16 11:2,5,8,12,18,25</p> <p>MEETING 3:2 12:5</p> <p>middle 9:19</p> <p>Mississippi 7:2 8:15</p>	<p>Mm-hmm 8:6,9 9:7</p> <p>money 11:4</p> <p>month 6:22</p> <p>Mount 5:3</p> <p>Myriam 3:11</p> <hr/> <p>N</p> <hr/> <p>name's 9:18</p> <hr/> <p>O</p> <hr/> <p>obtained 4:7</p> <p>opportunity 10:17</p> <p>options 5:16</p> <p>organization 10:24</p> <p>overflow 8:19</p> <p>overflows 8:15, 16</p> <hr/> <p>P</p> <hr/> <p>p.m. 3:5 12:6</p> <p>parcel 10:2</p> <p>parcels 9:25</p> <p>patchwork 6:20</p> <p>Paul 5:3</p> <p>peaceful 7:4</p> <p>people 7:1 10:15, 24</p> <p>Perfect 9:3</p> <p>plan 4:4,6</p>	<p>Port 5:6 10:25</p> <p>positive 10:5</p> <p>possibly 8:22</p> <p>potential 8:16</p> <p>potentially 5:10</p> <p>power 11:3</p> <p>pretty 5:14</p> <p>prison 10:9,13</p> <p>problem 11:14</p> <p>projects 9:22</p> <p>property 8:21 10:12</p> <p>putting 6:24</p> <hr/> <p>Q</p> <hr/> <p>quiet 7:4</p> <hr/> <p>R</p> <hr/> <p>R-E-N-K-E-S 3:21,22</p> <p>railroad 10:17</p> <p>read 6:6 7:24</p> <p>ready 3:12,14,15, 16,17 8:4 9:16</p> <p>real 10:5</p> <p>record 4:14 5:25 7:19 9:9 11:11,17</p> <p>recording 4:21 6:9</p> <p>release 10:6</p> <p>remotely 4:16</p> <p>Renkes 3:10,20, 21,24 4:2,11</p>
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<p>reporter 3:13,17, 23 4:16 7:17 9:3, 7 11:14,21 12:2</p> <p>resident 8:22</p> <p>residents 8:20</p> <p>River 7:2 8:15,16</p> <p>riverfront 10:7,11</p> <p>road 6:16,19 8:21</p> <p>Ronald 9:15,18 11:3,6</p> <p>Rowan 3:7,11,15, 25 4:10,12,15,18, 24 5:19,22 6:1,5, 8,11 7:7,10,13, 16,20,23 8:2,4,6, 9,24 9:4,10,16 11:2,5,8,12,18,25 12:3</p> <hr/> <p>S</p> <hr/> <p>S-A-R-A 3:21</p> <p>S-C-H-A-U 6:14</p> <p>Sara 3:10,20,24 4:2,11</p> <p>Schau 6:4,7,10, 13,14 7:9,12,15</p> <p>SCOPING 3:2 12:5</p> <p>seat 7:20 9:10</p> <p>ship 10:20</p> <p>sir 11:5</p> <p>sit 4:1</p> <p>Smith 9:15,18,19 11:3,6</p> <p>space 5:11</p>	<p>spell 3:8,19 4:19 6:3 7:23 8:9 9:13</p> <p>spells 10:3</p> <p>spring 6:18</p> <p>stability 5:18</p> <p>state 3:8,19 4:3, 19 6:2</p> <p>study 10:1</p> <p>support 4:3,5</p> <p>supposed 10:13</p> <p>surround 5:9</p> <hr/> <p>T</p> <hr/> <p>talking 5:6</p> <p>technical 4:22,24 6:9</p> <p>thing 5:5,11</p> <p>things 10:16 11:4</p> <p>Thomas 5:3</p> <p>THURSDAY 3:4</p> <p>towns 5:8</p> <p>trade 10:10</p> <p>traffic 6:17</p> <p>TRANSCRIPT 3:1</p> <p>trucks 6:19 10:22</p> <p>turn 8:20</p> <p>turned 10:5</p> <hr/> <p>W</p> <hr/> <p>wanted 4:3</p> <p>water 10:18</p> <p>wildlife 10:9</p>	<p>wonderful 5:12</p> <p>work 6:21</p> <p>working 10:16, 24,25</p> <p>wrapping 11:13</p> <hr/> <p>Y</p> <hr/> <p>year 6:18</p> <p>years 8:14 9:21 10:6</p> <hr/> <p>Z</p> <hr/> <p>ZOOM 3:3</p>	
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APPENDIX O

PUBLIC SCOPING COMMENTS, AS RECEIVED

From: [Lauren Cooper](#)
To: [Cannella, Michelle](#)
Cc: [Christopher Koeppel](#); William.T.Knuth.civ@army.mil; [Thomas A CIV USARMY HQDA DCS G-9 \(USA\)](#); [Joseph H. Hand](#); casey.k.potts@usace.army.mil; [Hayes, Beverly](#)
Subject: Early Coordination for BRAC of LRA Parcel 20 at SVADA
Date: Wednesday, August 21, 2024 6:17:05 PM
Attachments: [Outlook-cid_1D9002.png](#)

Some people who received this message don't often get email from lcooper@achp.gov. [Learn why this is important](#)

CAUTION: This email originated from an external sender. Verify the source before opening links or attachments.

Hi Michelle,

Thank you for your letter, received on August 12, 2024, regarding the disposal and reuse of Local Redevelopment Authority Parcel 20 at the Savannah Army Depot Activity. As noted in your letter, ACHP commented on the project in correspondence dated December 21, 2023, and we have no additional comments at this time. Also, we don't have input regarding a separate agency scoping meeting.

We appreciate the continued communication for this project, and please reach out if you have any questions,

Lauren

Lauren Cooper

Program Analyst/ Army Liaison
 Advisory Council on Historic Preservation
 401 F Street NW, Suite 308, Washington, DC 20001
 Phone: 202.517.0213
 Email: lcooper@achp.gov



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December 21, 2023

Mr. William T. Knuth
Base Environmental Coordinator
Savanna Army Depot Activity
18935 B Street
Savanna, IL 61074

Ref: *Disposal and Reuse of Local Redevelopment Authority Parcel 20*
Savanna Army Depot Activity, Carroll County, Illinois
ACHP Project Number: 020363

Dear Mr. Knuth:

On November 30, 2023, the Advisory Council on Historic Preservation (ACHP) received your notification regarding the disposal of Local Redevelopment Authority (LRA) Parcel 20 at the Savanna Army Depot Activity to the Jo-Carroll Depot LRA through a no-cost economic development conveyance. In accordance with Stipulation IV.D of the 2000 *Programmatic Agreement Among United States Army, Illinois State Historic Preservation Officer, and Advisory Council on Historic Preservation for the Closure and Disposal of Savanna Army Depot Activity, Illinois*, the Department of the Army will be incorporating a preservation covenant in the transfer instrument as there are two identified archaeological sites within the parcel. The ACHP notes that the Illinois State Historic Preservation Office as requested that if any modifications are made to the Jo-Carroll LRA master plan that its office is notified, and the ACHP recommends that this request be included in the preservation covenant. The ACHP does not have any additional comments on this action.

Should you have any questions or require additional assistance, please contact me at (202) 517-0222 or by e-mail at ckoeppel@achp.gov and reference the ACHP Project Number above.

Sincerely,

Christopher Koeppel
Assistant Director
Office of Federal Agency Programs
Federal Property Management Section

From: Michelle.Cannella@tetrattech.com
Subject: FW: SVADA LRA 132-Acre Property Proposal - Savanna IL USACE Letter

From: Black, Travis (MARAD) <Travis.Black@dot.gov>
Sent: Monday, October 7, 2024 9:14 AM
To: Knuth, William T CIV USARMY HQDA DCS G-9 (USA) <william.t.knuth.civ@army.mil>; thomas.a.lineer.civ@mail.mil
Subject: Re: SVADA LRA 132-Acre Property Proposal - Savanna IL USACE Letter

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Todd Knuth,

Sorry for the delay in responding to your “early coordination for a supplemental environmental impact statement for the implementation of base realignment and closure disposal and reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois “ letter dated August 8, 2024.

I just visited my office this morning and found the letter.

Should a meeting, agency or public, be scheduled I would like to be advised. I would encourage email notifications and virtual meeting options if possible.

Thank you, I have no comments beyond those submitted Dec20, 2023 at this time.

Travis Black
 Maritime Administration
 St. Louis

From: Black, Travis (MARAD)
Sent: Wednesday, December 20, 2023 2:33:58 PM
To: william.t.knuth.civ@army.mil <william.t.knuth.civ@army.mil>; thomas.a.lineer.civ@mail.mil <thomas.a.lineer.civ@mail.mil>
Cc: Simmons, James (FMCSA) <james.simmons@dot.gov>; Houston, Linden (MARAD) <Linden.Houston@dot.gov>
Subject: SVADA LRA 132-Acre Property Proposal - Savanna IL USACE Letter

Thomas Lineer/William “Todd” Knuth,

Thank you for the opportunity to provide input to your Environmental Assessment as you explore a request of transfer of surplus properties to the disposal and reuse of LRA Parcel 20, Savanna Army Depot Activity (SVADA) in Illinois (132-acre site) for use as an industrial park.

While I don’t have any concerns I did want to encourage your action. The USACE proposal is very consistent with the Maritime Administrations Port Conveyance authority. Through our authority, agencies and departments of the Federal government may find that they own property that they no longer require due to programmatic changes, relocation of resources, or other operational changes. The Federal Property and Administrative Services Act of 1949, as amended, provides for the disposal of excess real property to other executive agencies that could benefit from that property.

The Port Conveyance Program is designed to transfer the use and management of excess Federal property to States and local governments for the purposes of port development, port expansion, and operation of port facilities. Since the program’s inception, the Maritime Administration has conveyed nearly three thousand acres of property to State and local governments in support of port facilities.

The Port Conveyance Program requires the Maritime Administration to receive, evaluate, and approve applications from prospective grantees to make recommendation for assignments of surplus property to be used for the development or operation of a port facility. MARAD, in conjunction with the Department of Commerce, reviews and approves economic development plans submitted by eligible applicants to determine if the plan is viable as part of a necessary economic development program. Conveyance involves no monetary consideration, provided the property is used and maintained in perpetuity as a port facility. Excess military installations are usually disposed of as a part of the Defense Base Closure and Realignment Act of 1990

Our administration believes that well-planned port conveyance development projects improve port facility productivity and promote seamless intermodal transfer, which in turn benefits port communities by improving access to land, reducing highway and rail congestion, and minimizing air pollution. Port improvements also create jobs and stimulate the economy in localities.

We have been working with and encouraging the Jo-Carroll Depot local redevelopment authority (LRA) in their desire to create a port and industrial park. These plans have been developed with extensive public input and outreach. We feel that your actions to dispose of the 132 -acre parcel for their re-use plan is a win for the community and for the potential enhancement of the supply chain by moving goods on the waterway (the most environmentally friendly, safest and with the fewest disruptive impacts mode of transportation). This action will be similar to a previous base closing at America's Central Port in Granite City, IL.

Please let me know if you have any questions or need clarification about our port conveyance program. This proposal doesn't raise any issues and we encourage you to move forward.

Thanks & Regards,

Travis

Travis Black
Director, Inland Waterways Gateway Office
Office of Maritime & Intermodal Outreach
Maritime Administration | U.S. Department of Transportation
St. Louis, MO

☎ 202-264-0433 (work cell)

✉ Travis.Black@dot.gov | 🌐 www.maritime.dot.gov

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From: Black, Travis (MARAD) <Travis.Black@dot.gov>

Sent: Wednesday, December 20, 2023 2:34 PM

To: Knuth, William T CIV USARMY HQDA DCS G-9 (USA) <william.t.knuth.civ@army.mil>;
thomas.a.lineer.civ@mail.mil

Cc: Simmons, James (FMCSA) <james.simmons@dot.gov>; Houston, Linden (MARAD)
 <Linden.Houston@dot.gov>

Subject: [Non-DoD Source] SVADA LRA 132-Acre Property Proposal - Savanna IL USACE Letter

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Thomas Lineer/William "Todd" Knuth,

Thank you for the opportunity to provide input to your Environmental Assessment as you explore a request of transfer of surplus properties to the disposal and reuse of LRA Parcel 20, Savanna Army Depot Activity (SVADA) in Illinois (132-acre site) for use as an industrial park.

While I don't have any concerns I did want to encourage your action. The USACE proposal is very consistent with the Maritime Administrations Port Conveyance authority. Through our authority, agencies and departments of the Federal government may find that they own property that they no longer require due to programmatic changes, relocation of resources, or other operational changes. The Federal Property and Administrative Services Act of 1949, as amended, provides for the disposal of excess real property to other executive agencies that could benefit from that property.

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004a

004b

Please let me know if you have any questions or need clarification about our port conveyance program. This proposal doesn't raise any issues and we encourage you to move forward.

004c

Thanks & Regards,

Travis

Travis Black
Director, Inland Waterways Gateway Office
Office of Maritime & Intermodal Outreach
Maritime Administration | U.S. Department of Transportation
St. Louis, MO
☎ 202-264-0433 (work cell)
✉ Travis.Black@dot.gov | 🌐 www.maritime.dot.gov

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DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS - ROCK ISLAND DISTRICT
CLOCK TOWER BUILDING - PO BOX 2004
ROCK ISLAND, ILLINOIS 61204-2004

October 10, 2024

Mr. Todd Knuth
SVADA Base Environmental Coordinator
Savanna Army Depot Activity
18935 B Street
Savanna, IL 61074

Dear: Mr. Knuth:

We received your letter dated August 8, 2024, initiating early coordination for the preparation of a Supplemental Environmental Impact Statement (SEIS) to evaluate the potential effects of the Army disposing a 132-acre parcel of the Savanna Army Depot Activity (SVADA) and the local redevelopment authority's (LRA's) action of reusing of the parcel.

You recently coordinated this project as an environmental assessment (EA) with the US Army Corps of Engineers, Rock Island District (District) in November 2023 and the District provided information to you in a letter dated January 16, 2024. Based on information provided during the EA scoping process, the Army determined that preparations of a SEIS would be appropriate.

The Army is requesting the District's input on holding an agency meeting separate from the public scoping meeting and any to provide any comments in addition to those provided in our previous letter. District staff feels it would be valuable and would like to be involved in an agency meeting separate from the public scoping meeting. District staff also had one comment in addition to what was provided in the January 16, 2024, letter: *The additional navigation traffic in the slough may cause additional erosion. The potential for that erosion and the associated impacts to resources in the public trust on federal lands such as archeological resources should be addressed.*

Thank you for continuing to keep the District involved as the project progresses and we look forward to future meetings. If you need more information, please contact Ms. Kelsey Hoffmann of our Environmental Compliance Branch, at (309)-794-5319 or Kelsey.A.Hoffmann@usace.army.mil.

Sincerely,

A handwritten signature in black ink, reading "Jodi K. Creswell", is positioned below the "Sincerely," text.

Digitally signed by Jodi
Creswell
Date: 2024.10.10 15:29:02
-05'00'

Jodi K. Creswell
Chief, Environmental Planning Branch

005a

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005c



DEPARTMENT OF THE ARMY
CORPS OF ENGINEERS - ROCK ISLAND DISTRICT
CLOCK TOWER BUILDING - PO BOX 2004
ROCK ISLAND, ILLINOIS 61204-2004

January 16, 2024

Mr. Todd Knuth
SVADA Base Environmental Coordinator
Savanna Army Depot Activity
18935 B Street
Savanna, IL 61074

Dear: Mr. Knuth:

I received your letter dated December 14, 2023, concerning the preparation of an Environmental Assessment (EA) to evaluate the potential effects of the Army disposing a 132-acre parcel of the Savanna Army Depot Activity (SVADA) and the local redevelopment authority's (LRA's) action of reusing of the parcel. The US Army Corps of Engineers, Rock Island District (District) staff reviewed the information you provided and have the following comments:

006a

In your proposal, "Parcel 20", Tract 501 (also known as Apple River Island) is District administered land. The District real estate office would require a Real Estate Application to detail all known work or future work concerning Tract 501 prior to considering issuing an outgrant, therefore, further coordination with District real estate office is required.

006b

If you have any questions regarding requirements for real estate, please contact Ms. Caitlin Wheeler, Real Estate Specialist at the Rock Island District. You may reach Ms. Wheeler by email at Caitlin.S.Wheeler@usace.army.mil or by telephoning 309-794-5274

Any proposed placement of dredged or fill material into waters of the United States (including jurisdictional wetlands) requires Department of the Army authorization under Section 404 of the Clean Water Act. Based on the information you provided, a Section 404 permit may be required for this project. A completed application packet should be submitted to the Rock Island District for processing as soon as possible. The application should include final plans, wetland delineations using the Corps 1987 Wetland Delineation Manual and Midwest Regional Supplement, details of proposed impacts to wetlands and other waters of the United States, a statement explaining how impacts associated with the proposed activity are to be avoided, a description of planned components intended to minimize impacts to wetlands and streams, and a complete wetland/stream mitigation plan. The requirements for a complete mitigation plan are described in the

006c

Federal Register (Volume 73, No. 70) dated April 10, 2008, under “Compensatory Mitigation for Losses of Aquatic Resources; Final Rule”.

Your proposal may also include impacts to navigation under Section 10 of the River and Harbors Act and would require a permit. Please see Enclosure 1 for addition permitting requirements and information.

006d

Your proposal includes modifications to the Mississippi River Navigation Channel, a Federal project, therefore; a section 408 permit will be required.

006e

If you have any questions regarding permitting requirements under Section 404 of the Clean Water Act, Section 10 of the River and Harbors Act, or Section 408, please contact Ms. Aurora Scott, Regulatory Biologist at the Rock Island District. You may reach Ms. Scott by email at Aurora.C.Scott@usace.army.mil or by telephoning 309-794-5057.

006f

The District Hydrology and Hydraulics (H&H) Branch reviewed the proposed project and provided some analysis (Enclosure 2).

006g

If you have any questions regarding H&H, please contact Mr. Kevin Landwehr, Hydrology and Hydraulics Branch Chief at the Rock Island District. You may reach Mr. Landwehr at Kevin.J.Landwehr@usace.army.mil or by telephoning 309-794-5310.

This Mississippi River Project Office Operations Division reviewed the proposed project and provided supplement comments and information (Enclosure 3).

006h

If you have any questions regarding Operations Division comments, please contact Mr. Joe Lundh, Natural Resources Specialist at the Rock Island District. You may reach Mr. Lundh at Joseph.S.Lundh@usace.army.mil or by telephoning 309-794-4528.

The Responsible Federal Agency should coordinate with the Illinois State Historic Preservation Office (SHPO) to determine impacts to historic properties. Contact information can be found at: <https://dnrhistoric.illinois.gov/preserve/contact-staff.html> or by phone at 217-782-4836.

006i

The Rock Island Field Office of the U.S. Fish and Wildlife Service should be contacted to determine if any Federally listed endangered species are being impacted and, if so, how to avoid or minimize impacts. The Illinois & Iowa Ecological Services Field Office address is: 1511 47th Avenue, Moline, IL 61265. Mr. Kraig McPeck is the Field Office Supervisor. You can reach him by calling 309-757-5800.

006j

The Illinois Emergency Management Agency should be contacted to determine if the proposed project may impact areas designated as floodway. Sam M. Al-Basha is the Illinois State Hazard Mitigation Officer. The address is: 1035 Outer Park Drive, Springfield, IL, 62704. You can reach him by calling 217-785-9942.

006k

The District plans to adopt the EA to satisfy NEPA requirements for the civil works portion of the proposed action. The US Army NEPA document should address our concerns outlined in this letter.

006l

No other concerns surfaced during our review. As your planning progresses, the District may have additional comments. Thank you for the opportunity to comment on your proposal. If you need more information, please call Ms. Kelsey Hoffmann of our Environmental Compliance Branch, at Kelsey.A.Hoffmann@usace.army.mil or at (309)-794-5319.

006m

You may find additional information about the Corps' Rock Island District on our website at <http://www.mvr.usace.army.mil>. To find out about other Districts within the Corps, you may visit: <http://www.usace.army.mil/Locations.aspx>.

Sincerely,

Jodi K. Creswell
Chief, Environmental Planning Branch

MEMORANDUM FOR RECORD

SUBJECT: Jo Carroll Depot Local Redevelopment Authority Final Reuse Plan for Parcel 20

1. Memo Description

Section 9.6 of the reuse plan identifies next steps which include coordination with regulatory partners. This memo is intended to provide guidance for the applicant on potential information required to properly evaluate the permit for navigation impacts under Section 10 of the Rivers and Harbors Act. The guidance identified in this memo is not all inclusive of what may be required for permitting review for Section 10 compliance but is intended to provide initial considerations for the applicant to address in the forthcoming permit documents. Additional considerations may arise as the project moves from plan formulation to the design phase and additional details become available.

006n

2. Relevant Background Information and Discussion

The Savanna Army Depot Activity site is a 13,062-acre former Army installation located on the eastern bank of the Mississippi River in Carroll and Jo Daviess counties, seven miles north of the city of Savanna, Illinois. The Jo Carroll Depot Local Redevelopment Authority (LRA) has been recognized by the Department of Defense (DoD) as the Local Redevelopment Authority for this surplus property. The LRA has developed a multifunctional reuse plan for the site that includes a port facility, fleeting areas, aquatic restoration area, and recreational uses.

006o

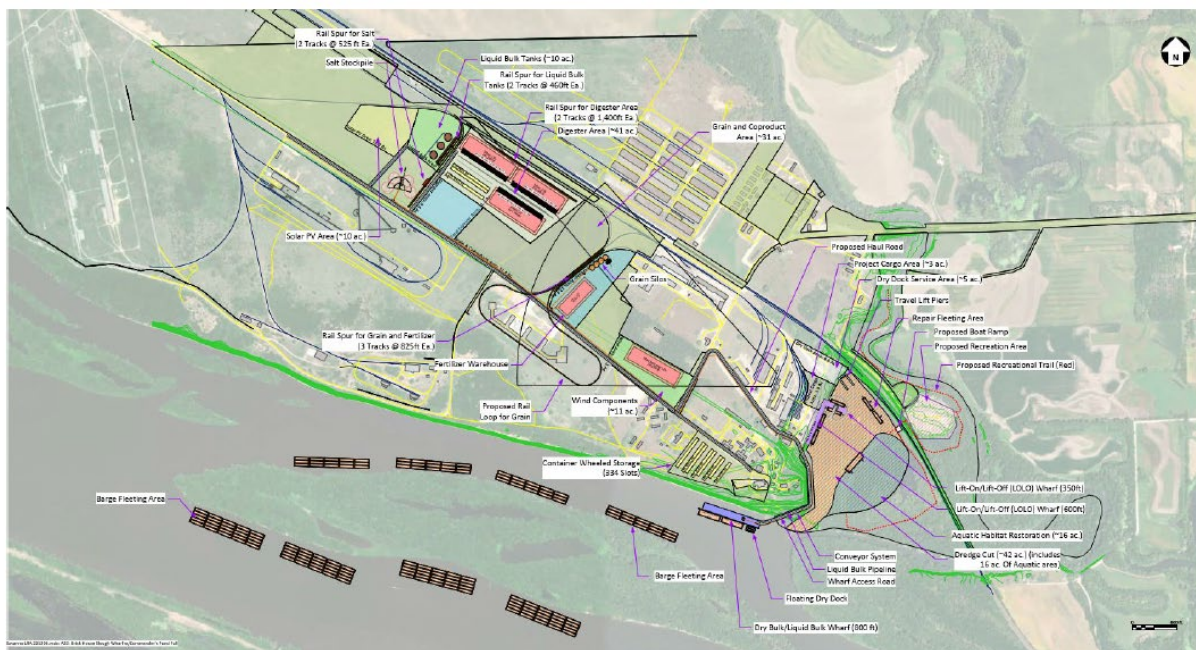


Figure 1: Figure 8-4 from the Parcel 20 Reuse Plan

3. Operations Division, Channel Maintenance Considerations

- a. Existing River Training Structures including closing structures and wingdams are located in the project vicinity. The Reuse Plan is not clear if there are proposed alterations to the structures or the effective area of the structures. A detailed plan of any alterations or activities that impact the effectiveness of the structures will be required. Specific analysis information required will depend on the proposed modifications in or around those structures and requirements from Engineering Division, Hydraulics.
- b. Fleeting areas on the channel side of Apple Island as identified in Figure 1 (Figure 8-4 of the Reuse Plan) will need to be evaluated to determine the impacts to navigation, existing revetment, and the unprotected bankline. Details should include fleeting appurtenances, analysis of prop wash on the existing riprap revetment and bankline, and proposed traffic patterns for the fleeting areas to allow evaluation of impacts of the proposed fleeting area to the navigation channel.
- c. As plans progress, layout and traffic patterns for the entrance and exit of the proposed port need to be evaluated for impacts to the existing river training structures, impacts to sediment transport, and navigational hazards. It is currently unclear if the proposed plan is to utilize areas upstream or downstream of Apple Island or a combination of the two for the entrance/exit. The analysis should include hydrographic survey of existing conditions, proposed final conditions, plans for identification and preservation of river training structures, and a barge turning analysis for entering and exiting the port from the main channel.

006p

4. Other Office Coordination

- a. The hydraulic analysis review identified in this memo will be completed by the MVR Hydrology and Hydraulics Branch. Their review comments will be submitted in a separate document and will identify specific requirements for hydraulic analysis review that will inform the channel maintenance decision.

006q

Jarin Rudsell, P.E.
Channel Maintenance Section Chief

SUBJECT: H&H Review and Comments of Savanna Army Depot Disposal and Reuse Proposal

1. Pertinent information related to action being reviewed.

a. Project Description: The Savanna Army Depot Activity site is a 13,062-acre former Army installation located on the eastern bank of the Mississippi River in Carroll and Jo Daviess counties, seven miles north of the city of Savanna, Illinois. The Jo Carroll Depot Local Redevelopment Authority (LRA) has been recognized by the Department of Defense (DoD) as the Local Redevelopment Authority for this surplus property. The LRA has developed a multifunctional reuse plan for the site that includes a port facility, fleeting areas, aquatic restoration area, and recreational uses (Figure 1). This review is based upon the information provided in the "Jo Carroll Depot Local Redevelopment Authority, Final Reuse Plan for Parcel 20, Former Savanna Army Depot", dated June 2023.

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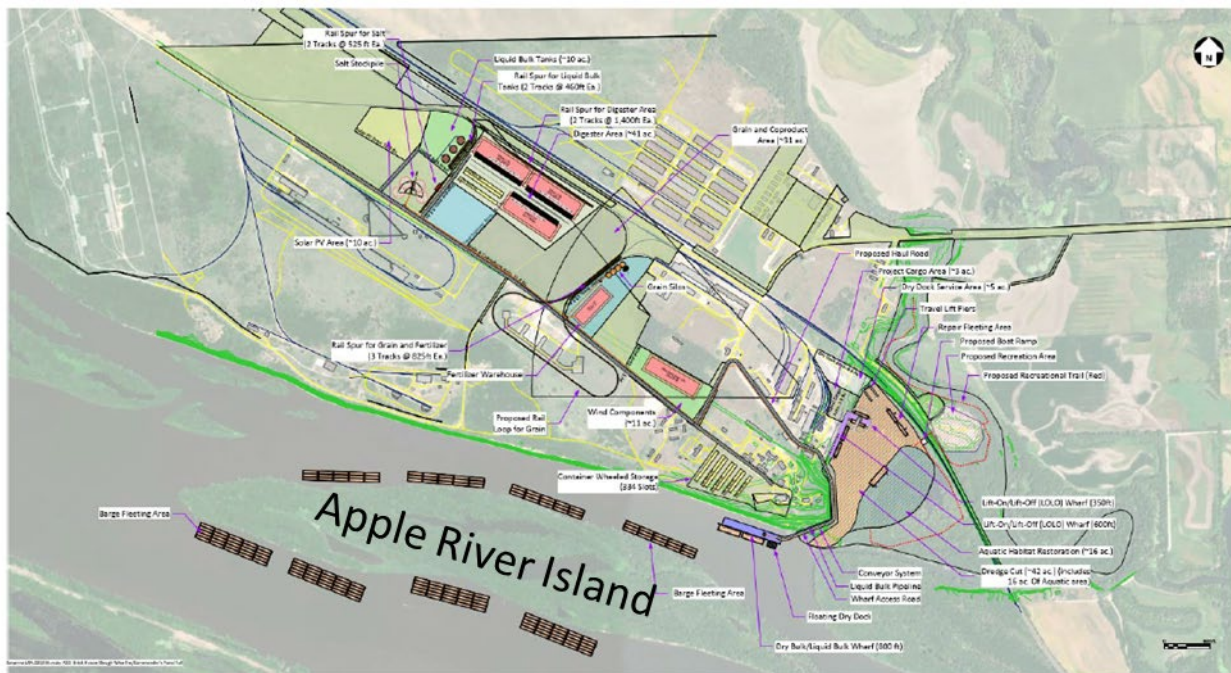


Figure 1: LRA Preferred Alternative (Figure 9-1 of Final Reuse Plan Report).

b. The U.S. Army is requesting USACE review as they prepare an Environmental Assessment to evaluate the potential effects of the Army's primary action of disposing the Savanna Army Depot, and the local redevelopment authority's secondary action of reuse of the parcel.

c. The proposed facility is to be located on a side channel to the UMR within Pool 13. Proposed fleeting areas have been identified on both the navigation channel and side channel banks of Apple River Island. Numerous wingdams and a closing dam are in the immediate vicinity of the proposed port facility and fleeting areas (Figure 2).

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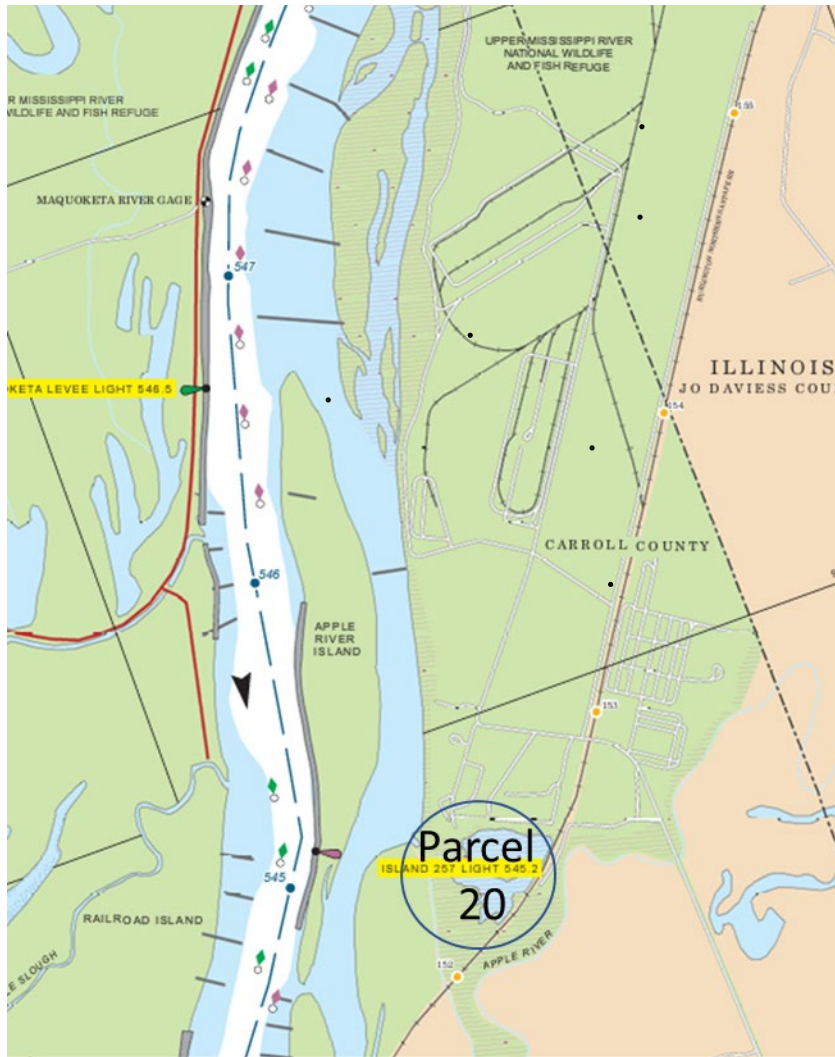


Figure 2: Portion of UMR Navigation Chart showing wingdam and closing dam locations.

d. To provide access to the proposed facilities, extensive access channel dredging (~400,00 yd³; orange area in Figure 3) is proposed with additional dredging (~840,000 yd³; yellow and green areas in Figure 3) on Parcel 20 to accommodate the lift-on/lift-off port area and other project features (Figure 3). The identified dredging areas do not appear to cover all of the proposed fleeting areas shown in Figure 1, and do not specifically address the location or size of the dredged connection to the main channel of the UMR.

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Figure 3. Redevelopment plan identified dredging requirements.

e. Historical records indicate frequent dredging upstream of the project reach, below the mouth of the Maquoketa River. Immediately adjacent to Apple River Island, there have been a few historical dredging events, but none in the last several decades.

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2. Comments from Hydrology & Hydraulics Branch:

a. In addition to Section 10 review of the future project, alteration of the closing dam, or any windams, should be reviewed under Section 408 to ensure the existing USACE project (UMR 9-foot channel project) is not impacted.

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b. Review of available bathymetry (Figure 4) indicates that there is insufficient depth in the access channels to allow for navigation to the proposed port facility and some of the fleeting locations. The likely access dredging paths (both upstream and downstream) and the proposed fleeting locations intersect with existing wingdams, a closing dam, and would necessitate removal of a portion of one or more islands in the UMR National Wildlife and Fish Refuge. The provided report estimates total dredging quantities at approximately 1.2 million cubic yards but does appear to capture the full area under consideration.

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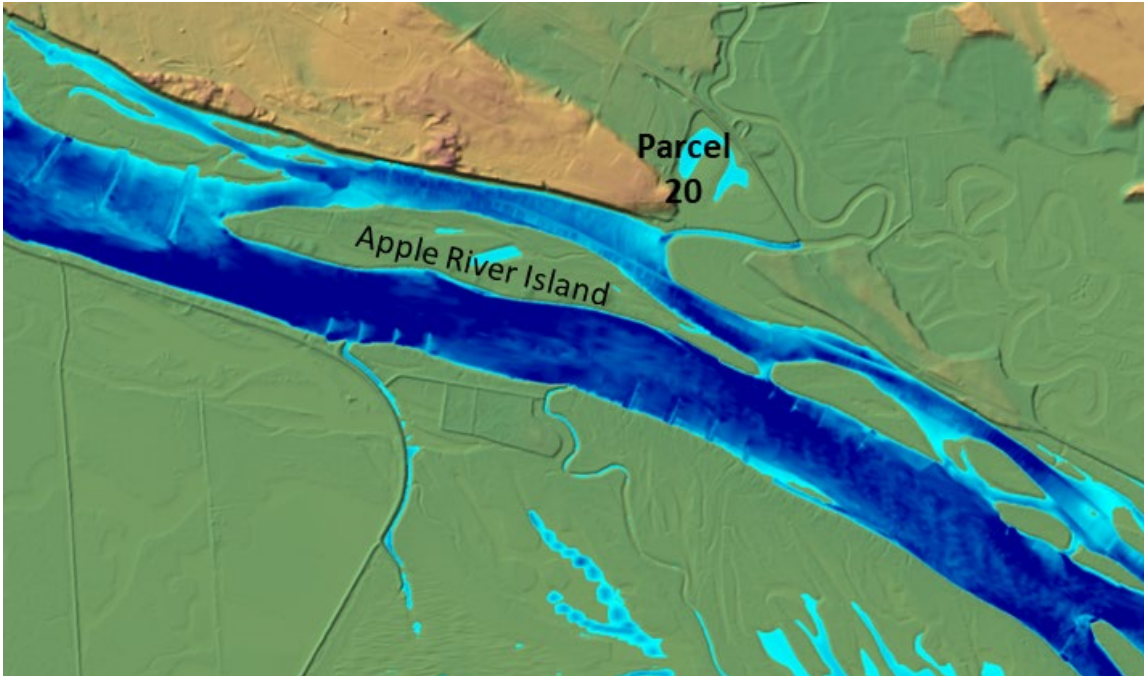


Figure 3. Topobathy data in the vicinity of the proposed project.

c. The provided report provides only a general description of the proposed improvements. Prior to any USACE permitting or approvals (Section 10, 408, etc.), site specific details and drawings will be required that provide:

1. Mapping and cross-sections depicting the location, elevations, and quantities of proposed dredging, including locations of proposed placement of the dredged materials
2. Drawings showing any proposed modifications to the existing wingdams and closing dam.

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d. The extensive dredging of the side channel, expansion of the side channel downstream connection to the main channel, and the potential modification of the channel training structures in the reach have the potential to impact the conveyance of water and sediment in the main navigation channel. This has the potential to impact reliability of maintaining the navigation channel and the long-term channel maintenance requirements (e.g., dredging) for USACE. Therefore, multi-dimensional hydraulic modeling will be required prior to permission being given for the project to proceed. The scope and extent of modeling should be developed in consultation with USACE once the information identified in the paragraph above is available. Depending upon the results of the hydraulic modeling, sediment transport modeling may also be required. Per EC 1165-2-220, proposed alterations to USACE civil works projects must not impair the usefulness of the USACE project nor be injurious to the public interest.

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e. Lands (including refuge lands) adjacent to the identified fleeing areas and access channels will be subjected to potential erosion from fleeing and transiting vessels. Future submittals should address this potential as well as any proposed bank protection/stabilization required.

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3. Due to the potential impacts to existing USACE property and maintenance of the navigation channel, additional information and consultation will be needed with USACE prior to formal review under Section 10 or Section 408.

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Submitted by,

/s/

Kevin Landwehr
Chief, Hydrology and Hydraulics Branch
CEMVR-EC-H

SUBJECT: Mississippi River Project Comments on Final Reuse Plan for Parcel 20 at the Former Savanna Army Depot

1. **These Mississippi River Project comments on the subject plan are intended to supplement the Corps comments but may overlap with other support and technical offices in the District.**
2. **The proposed plan appears to affect the operation and maintenance of the Project and specifically the navigation channel and potentially affect or is coincident with Corps fee title Real Estate interest. All applicable Corps regulations for development requests affecting a civil works project should be followed. We encourage the Port Authority and Local Redevelopment Authority to work closely with the Project and the Corps to address information needs and pursue all applicable permissions.**
3. **The Final Reuse Plan for Parcel 20 involves riverbed, navigation structures, and other fee title lands outside of this tract.**
4. **The plan proposes barge mooring structures on riverbed in Illinois adjacent to Apple River Island. Riverbed is not sovereign lands to the State, but rather able to be owned by private and public entities. Placement of structures in Illinois riverbed should involve permissions from the landowner. Typically, that the owner of the shoreline or islands in Illinois also owns the adjacent riverbed. Apple River Island federal fee Real Estate interest was transferred to the U.S. Army Corps of Engineers. The Project will defer to the Real Estate Office in Rock Island District for further comment on input on federal ownership.**
5. **Regardless of establishing whether the riverbed around Apple River Island has fee title interest by the Corps, placement of structures and barge fleeting area surrounding the island may affect the shoreline and shoreline erosion. The plans did not include any study of the impacts or mitigation measures if increase in shoreline erosion is anticipated.**
6. **If this request does affect federal Real Estate fee title interest of the Corps, then the Non-Recreation Outgrant Policy, Chapter 17 of Engineering Regulation (ER) 1130-2-550 and other applicable policy should be followed.**
7. **The Operations Division Technical Branch (OD-T) and navigation industry should have the chance to comment on the fleeting areas adjacent the navigation channel. It appears that barge traffic may be within a few hundred feet from current Apple River Island shoreline. Potential impacts to the navigation channel and navigation industry operations should be considered and studied.**
8. **The access requirements for barge fleeting and access to the port may affect navigation structures and the operation of the Project. District Engineering and OD-T staff should**

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have the opportunity to request and review flow studies. The Project will defer to their expertise, but in the absence of additional comment, here are some Project comments: Placement of barge fleeting areas above and below a closing structure appears to require changes to the closing dam for commercial navigation access over the structure. There is no mention any changes to the side channel closing structure in the plans. Changing side channel structures and dredging into a side channel with closing structures may have an impact to the navigation channel. If flow increases in this side channel, a resulting reduction in flow in the main channel may increase dredging requirements for the channel. This should be studied and considered. Wing dams in the vicinity of Apple Island was listed as a voiced concern during public and TAC input but was not addressed in the plan.

S/
JOSEPH S LUNDH
Mississippi River Project



REGION 5
CHICAGO, IL 60604

August 26, 2024

VIA ELECTRONIC MAIL ONLY

Thomas Lineer, BRAC Program Manager
Department of the Army
Savanna Army Depot Activity
18935 B Street
Savanna, Illinois 61074

Re: EPA Scoping Comments for a Supplemental Environmental Impact Statement for the Implementation of Base Realignment and Closure Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois Carroll and Jo Davies Counties, Illinois

Dear Mr. Lineer:

The U.S. Environmental Protection Agency (EPA) has reviewed the Department of the Army's (DoA) August 8, 2024, early coordination request for reuse of a 132-acre parcel of the Savanna Army Depot Activity (SVAD) and expected subsequent reuse of this acreage. This letter provides EPA's comments on the early coordination request and Jo Carroll Depot Local Redevelopment Authority Final Reuse Plan for Parcel 20, Former Savanna Army Depot, dated June 2023 (hereinafter the Parcel 20 Reuse Plan), pursuant to our authorities under the National Environmental Policy Act (NEPA), the Council on Environmental Quality's (CEQ) NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

The SVAD site is a 13,062-acre former DoA installation located on the eastern bank of the Mississippi River, 9 miles north of Savanna, Illinois. Between 1917 and 1995, the DoA used the property for artillery weapons and ammunition testing, storage of ordnance, and the loading and renovating of shells and bombs. The 1995 Base Realignment and Closure (BRAC) Commission recommended closure of SVAD. A 1997 environmental impact statement (EIS) evaluated the closure, and the SVAD was officially closed in 2000. The forthcoming Supplemental Draft EIS (SDEIS) will supplement the 1997 EIS. The DoA has been conducting environmental remediation to clean-up surplus property in preparation for eventual property transfer.

On January 17, 2018, the DoA published notice in the Federal Register indicating surplus property was available at SVAD for public benefit purposes and that the Jo Carroll Depot Local Redevelopment Authority (LRA) had been recognized by the Department of Defense as the

Local Redevelopment Authority for this surplus property. The LRA performed an analysis (the Parcel 20 Reuse Plan) in support of reuse planning for LRA Parcel 20, which covers 132 acres, for DoA's use when preparing the NEPA scoping document.

The 132-acre parcel is undeveloped land sharing a border with the Upper Mississippi River National Wildlife and Fish Refuge, the Apple River, and a tributary of the Mississippi River. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast. The railway right-of-way and a sewage treatment plant surrounded by the 132-acre parcel and owned by the DoA are not part of the parcel to be transferred.

The LRA's finalized 2023 reuse plan presents three conceptual reuse alternatives for developing LRA Parcel 20, which focus on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development, under each alternative. Three conceptual alternatives for redevelopment of LRA Parcel 20 were identified in the scoping document as follows:

Alternative 1 (Brickhouse Slough) – This alternative prioritizes fleet¹ development of a dry bulk and liquid bulk wharf on the Brickhouse Slough and recreational use. Key port infrastructure includes a barge fleeting area, an 800-foot dry and liquid bulk wharf, a floating dry dock, a wharf access road, a haul road, a liquid bulk pipeline, and a conveyor system.

Alternative 2 (Commander's Pond Lite) – This alternative expands on Alternative 1 and adds a 600-foot lift-on/lift-off wharf to allow the handling of two 250-foot barges simultaneously to support expansion of specialty and breakbulk cargos and dry dock capacity. This concept would require approximately 18 acres of dredging within the Commander's Pond area to support access to Brickhouse Slough.

Alternative 3 (Commander's Pond Full) – This alternative expands on Alternative 2 and adds additional port support to include an additional 350-foot lift-on/lift-off wharf to allow the handling of two 250-foot barges simultaneously, a repair fleeting area, and the inclusion of an aquatic habitat restoration area. This concept would require approximately 42 acres of dredging within the Commander's Pond area with 26 acres to support cargo activities and the remaining 16 acres dedicated for aquatic habitat restoration. Alternative 3 is the LRA's preferred alternative as of November 27, 2023.

To facilitate implementation, the LRA designed the alternatives as sequential phases. Alternative 1 could be implemented within a target 5-year completion window, while Alternatives 2 and 3 could follow, with both having 5-year-plus completion windows. The LRA's proposed reuse plan includes activities outside the boundary of LRA Parcel 20.² Each of the LRA's reuse alternatives would require dredging.

¹ Fleeting would provide "parking areas" while cargo is being loaded/offloaded.

² In the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island.

Scoping information previously provided³ indicates the timing for capital expenditures is not fully established and will depend in large part on market interest and development participation by private partners as well as regulatory and permitting issues. To facilitate implementation, the alternatives are designed to phase into each other seamlessly and sequentially. For example, Alternative 1 could be initiated immediately with a target five-year completion window, while Alternatives 2 and 3 could follow in a five-year plus completion window.

According to the scoping information, the development of these parcels by the LRA could not occur if the land was not transferred to it by the DoA. NEPA regulations indicate connected actions are those actions that could not or would not occur but for another action (e.g., the proposed land transfer from DoA to LRA). Connected actions must be analyzed in the same NEPA document, because the environmental impacts generated from the non-DoA action would not occur but for the DoA action of transferring Parcel 20.⁴

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EPA provided detailed NEPA scoping comments dated February 2, 2024 (see enclosed letter). Based on the November 27, 2023, scoping information, we understood a Draft Environmental Assessment would be developed. Our comments in this letter recommend the forthcoming SDEIS address our recommendations regarding Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) sites, impacts to wetlands and aquatic resources, project design and staging, environmental justice and children's health, climate change, energy efficiency and environmental best practices, natural features, non-native invasive species, cumulative impacts, permitting, and inter-agency coordination.

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Thank you for the opportunity to review and provide comments on this project. Please contact the lead NEPA Reviewer, Kathy Kowal, via email at kowal.kathleen@epa.gov if you have any questions regarding the contents of this letter as well as to arrange inter-agency meetings concerning this project.

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Sincerely,

KRYSTLE
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KRYSTLE MCCLAIN
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Krystle Z. McClain, P.E.
NEPA Program Supervisor
Environmental Justice, Community Healthy, and
Environmental Review Division

Enclosures:

EPA Detailed Scoping Comments
Construction Emission Control Checklist
EPA's scoping letter dated February 2, 2024

(CCs continued on following page)

³ Dated November 27, 2023

⁴ 40 CFR 1501.3 (b)

CCs (with enclosures):

William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

Ed Britton, Upper Mississippi River National Wildlife and Fish Refuge

Jodi Creswell, U.S. Army Corps of Engineers, Rock Island District

Joe Hand, U.S. Army Corps of Engineers, Mobile District

Charlene Falco, Illinois Environmental Protection Agency

Bradley Hayes, Illinois Department of Natural Resources

Kraig McPeck, U.S. Fish and Wildlife Service

Nicole Goers, U.S. Environmental Protection Agency

EPA's Detailed Comments
Supplemental Environmental Impact Statement for the
Implementation of Base Realignment and Closure Disposal and
Reuse of LRA Parcel 20, Savanna Army Depot Activity
Illinois Carroll and Jo Davies Counties, Illinois

August 26, 2024

1. COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT (CERCLA)
SITES

A. LRA Parcel 20 includes CERCLA sites which were previously investigated [e.g., Site 20 (Abandoned Landfill), Site 73 (Stables Landfill), Site 77 (1917-Era Powder Magazines), Site 130 (Vincent Road Septic System), Shop Area (Buildings 100 through 129 Sanitary and Stormwater Sewer lines and Outfalls to Site 178 and Site 178 (Ordnance School Lake, also known as Commander's Pond)]. Based on information available to EPA, the current status of the CERCLA sites is as follows:

- **Site 20 (Abandoned Landfill):**

According to the *Final Record of Decision, Site 20 – Abandoned Landfill and Site 99 – Building 762, CF Plant Battery Shop and Leaching Pits, Savanna Army Depot Activity, Savanna, Illinois*, dated June 2016 (Site 20 Record of Decision (ROD)), the selected remedy included landfill capping with hotspot removal, long-term groundwater monitoring, and land use controls (LUCs). Based on the *Final Land Use Control Implementation Plan, Site 20 Abandoned Landfill, Savanna Army Depot Activity, Savanna, Illinois*, dated October 2019 (Site 20 LUCIP), the institutional and engineering controls for Site 20 include:

- environmental covenants to prohibit residential use, access to groundwater, and intrusive activities (including agricultural use) at the site;
- Illinois Environmental Protection Agency (Illinois EPA), DoA, and EPA review of LUC inspections and approval processes;
- maintenance of a vegetated engineered landfill cap constructed with at least 2 feet of compacted clay and 6 inches of topsoil and turf reinforcement mat including the intended vegetative cover and the underlying soil such that erosion gullies and localized settlement do not occur;
- use of site boundaries to limit site access: wetlands and the Apple River form the northeastern, eastern, and southern boundaries and a railroad right-of-way and fencing along the western boundary of the site; and,
- signs and engineered cap delineation posts are installed along the boundary of the site.

Based on the Final Second Five-Year Review Report for Savanna Army Depot Activity Superfund Site, Savanna, Jo Daviess and Carroll Counties, Illinois, dated June 2020 (2nd FYR), the excavation, offsite disposal of soil, and installation of a vegetated engineered landfill cap have been completed. However, the UECA [Uniform Environmental

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Covenants Act] environmental covenants have not been executed. Groundwater monitoring is still ongoing.

- **Site 73 (Stables Landfill):**

According to the Final Record of Decision, Site 73 – Stable Landfill and Site 178 – Ordnance School Lake, Savanna Army Depot Activity, Savanna, Illinois, dated August 2016 (Sites 73 & 178 ROD), the selected remedy for Site 73 includes “[R]emoval and disposal of bulk debris and drums as nonhazardous waste following appropriate characterization; excavation of soil containing COCs [contaminants of concern] at concentrations above the remediation goals for residential use; transportation of the excavated debris and soil to a RCRA [Resource Conservation and Recovery Act] Subtitle D permitted facility (assuming the soil is nonhazardous); and, restoration of the site, which may include restoration of disturbed wetlands.”

Based on the 2nd FYR, “Remedial action was completed in December 2018 and the completion report is in the final stages. Site meets requirements for unrestricted use.”

- **Site 178 (Ordnance School Lake also known as Commander’s Pond):**

According to the Sites 73 & 178 ROD, the selected remedy for Site 178 includes “[E]xcavation of outfall surface soil and sediment along the western shoreline containing COCs at concentrations above recreational remediation goals; transportation of excavated material to a RCRA Subtitle D permitted facility for disposal (assuming the material is nonhazardous); site restoration, including regrading and/or bank stabilization; implementation of administrative LUCs (e.g., zoning laws) to maintain recreational or industrial/commercial use of the property; development of a Land Use Control Implementation Plan (LUCIP) to document strategies for implementing, maintaining, monitoring, and enforcing LUCs at the site; and, periodic monitoring of the LUCs conducted annually and as part of CERCLA 5-year reviews; in the event that the site changes land use designation, the 5-year review will be used as a mechanism to determine if the site conditions require a modification or amendment to the site controls.”

Based on the 2nd FYR, “[E]xcavation and offsite disposal was conducted in December 2018. LUC Implementation Plan (LUCIP) is under review. LUCs need to be implemented.”

- **Site 77 (1917-Era Powder Magazines) and Site 130 (Vincent Road Septic System):**

Sites 77 and 130 were initially evaluated and determined not to require further investigation or remediation.

Recommendations for the SDEIS:

1. Given the current status of the CERCLA sites above, EPA has identified the following issues⁵ with regard to information contained in the scoping request and the Parcel 20 Reuse Plan:

⁵ The issues and recommendations provided herein do not represent a comprehensive regulatory and permitting review of the Parcel 20 Reuse Plan. Should the property be transferred, the EPA and other appropriate parties should be contacted regarding pertinent regulations and permitting requirements.

- a) The Scoping Request and the Parcel 20 Reuse Plan did not discuss how LUCs will be implemented and maintained under the conceptual redevelopment alternatives. As such, it is unclear if any of the three proposed reuse alternatives presented in the Parcel 20 Reuse Plan would impact the implementation of required LUCs that are established in the respective RODs for Sites 20 and 178. For example, the Parcel 20 Reuse Plan states, “The existing landfill area has potential space for a public gathering area and may include parking, recreational fields, a dog park, and gathering spaces such as picnic tables or gazebos;” however, there is no mention of the Site 20 LUCIP LUCs to “Protect human receptors from contact with the soil COCs and the landfill waste. Maintain the site in accordance with the Operation and Maintenance Plan and as required by 35 Illinois Administrative Code [IAC] 811.111” or “Prohibit unauthorized intrusive activity into or excavation of the landfill cap” in the scoping request or Parcel 20 Reuse Plan. Further, the Site 178 (Ordnance School Lake) land use control implementation plan (LUCIP) is still under development and has yet to be reviewed and approved by regulators.
- b) Section 3.4 [Ordnance and Explosives (OE) and Munitions Debris (MD)] of the Parcel 20 Reuse Plan indicates that Sites 20 and 73, “were confirmed disposal areas for munitions constituents based on historical contamination detected in the landfills, and uncontrolled dumping of munitions and munitions constituents may have occurred throughout Parcel 20.” However, the scoping request and Parcel 20 Reuse Plan do not discuss how potential exposure to munitions and munitions constituents will be mitigated. This is of particular concern given the proposed recreation areas and proposed recreational trails included in the conceptual redevelopment alternatives.
- c) The scoping request states, “Since publishing its reuse plan, the LRA also has indicated its interest in an interim use lease agreement and/or an early transfer agreement that would allow construction of a solar energy facility atop the capped landfill within LRA Parcel 20;” however, no further details were provided. For example, it is unclear how the construction of a solar energy facility atop the capped landfill at Site 20 will meet the Site 20 LUCIP LUCs to “Protect human receptors from contact with the soil COCs and the landfill waste. Maintain the site in accordance with the Operation and Maintenance Plan and as required by 35 Illinois Administrative Code [IAC] 811.111” or “Prohibit unauthorized intrusive activity into or excavation of the landfill cap.”
- d) Based on Sections 8.2 (Alternative 2: Commander’s Pond Lite) and 8.3 (Alternative 3: Commander’s Pond Full) of the Parcel 20 Reuse Plan, the conceptual redevelopment alternatives would require approximately 18 to 42 acres to be dredged including areas previously remediated. However, the cost and dredging estimates in Sections 9.2 (Cost Estimates) and 9.3 (Dredging Estimate) of the Parcel 20 Reuse Plan do not include details or costs associated with the management, characterization, or disposal of these dredged sediments. Constituents of concern at Site 178 previously included polynuclear aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), pesticides, and heavy metals. As such, it is unclear if the level of effort needed to dredge Site 178 has been sufficiently estimated.
- e) To date, the five CERCLA sites associated with LRA Parcel 20 have not been investigated for per- and polyfluoroalkyl substances (PFAS) contamination. As such, it

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is unclear if the conceptual redevelopment alternatives and associated costing are sufficiently representative should a PFAS remedial action be warranted.

2. Assuming the Parcel 20 Reuse Plan will be an appendix to a future SDEIS, ensure that revisions to the Parcel 20 Reuse Plan include detailed information regarding the implementation of LUCs under the conceptual redevelopment alternatives, following regulatory approval of the LUCIP for Site 178.
3. Ensure the Parcel 20 Reuse Plan clarifies how potential exposure to munitions and munitions constituents will be mitigated.
4. Revise the Parcel 20 Reuse Plan to include information about all conceptual redevelopment alternatives and demonstrate that any solar facility components installed on the landfill cover will not adversely affect the final cover system.
5. Revise the Parcel 20 Reuse Plan to discuss the management, characterization, and disposal of all sediments to be dredged, and include a discussion on the sediments' impact on costs and schedule. This plan should also include additional characterization of the non-remediated portions of Commander's Pond.
6. Ensure the Parcel 20 Reuse Plan discusses how potential exposure to PFAS will be characterized and potentially mitigated given the lack of PFAS characterization of the sites.

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2. WETLANDS/STREAMS/AQUATIC RESOURCES

- A. The scoping information indicates that Parcel 20 1) provides accessibility to water, roads, and rail, demonstrating access for port-related development, and 2) drains into creeks and sloughs of the Apple and Mississippi Rivers, replenishes groundwater supplies via low areas on the site, and contains bottomland forest. Due to its landscape location, it is likely that Parcel 20 contains wetlands and streams. Placing fill into wetlands or streams and/or relocation of or encapsulation of streams may trigger Clean Water Act (CWA) Section 404 permitting and the need for CWA Section 401 water quality certification from the Illinois EPA (IEPA).

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Recommendations for the SDEIS:

1. Before the SDEIS is released for public review and comment, a formal wetland and Waters of the U.S. delineation should be completed to know definitively where wetlands, streams, and other regulated Waters of the U.S. are located. EPA strongly recommends that this delineation be completed before and included in (as an appendix to) the SDEIS. The SDEIS should provide accurate information on impacts to regulated water resources, and information on how those impacts will be mitigated.
2. Identify acreage for both direct (e.g., permanent fill), indirect (e.g., changes in hydrology), and temporary (e.g., temporary fill) impacts to regulated water resources, including wetlands, for each action alternative. Understanding that plans have not yet been developed, using a range to identify impacts would be useful to understand potential impacts (e.g., 100-150 acres of wetland impact).
3. Disclose how sequencing established by the CWA Section 404(b)(1) Guidelines, namely, avoidance first, followed by demonstration of impact minimization, and mitigation for unavoidable impacts was applied to determine aquatic impacts. The CWA Section 404(b)(1) guidelines call for the Least Environmentally Damaging Practicable Alternative

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(LEDPA) to be selected to address impacts to wetlands, streams, and other waters of the United States.

4. Discuss potential wetland and stream mitigation requirements, if applicable.
5. Discuss the current conditions of surface water resources and potential impacts from the proposed project (e.g., impacts to Clean Water Act (CWA) Section 303(d)-listed water bodies and their impaired status).
6. Describe proposed measures to capture and filter stormwater runoff, preliminary drainage design, and proposed stormwater filtration.
7. Discuss whether sediments that would need to be dredged from Brickhouse Slough and Commander's Pond have been tested, and where clean dredged materials will be placed.
8. Consider beneficial re-use of dredged materials.

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3. **PROJECT DESIGN / PROJECT STAGING**

- A. The SDEIS should include information regarding potential construction.

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Recommendations for the SDEIS:

1. Consider impacts on existing infrastructure (e.g., drinking water intake locations, sewer/septic, utilities, stormwater and effluent discharge point sources, existing public and private piers and boat ramps) and how construction would impact or otherwise affect this infrastructure.
2. Provide information on contractor staging locations, access routes and locations, and mobilization.
3. Ensure that the wetland delineation to be undertaken includes all staging locations and that all staging and access road areas are investigated for the presence of regulated water resources.
4. Provide maps and figures showing all staging, access, and temporary road/mobilization locations, including areas of work within waterways.
5. Provide information on coordination with the state resource agencies regarding required permitting, and any required mitigation for proposed work.

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4. **ENVIRONMENTAL JUSTICE AND CHILDREN'S HEALTH**

- A. Outreach and meaningful engagement are underlying pillars of environmental justice (EJ). It is imperative that DoA determine if the proposed Project will affect communities with EJ concerns. CEQ requires Lead agencies to analyze the disproportionate and adverse human health and environmental effects of a proposed action in communities with EJ concerns.⁶ If significant human health and environmental effects disproportionately and adversely affect communities with EJ concerns, CEQ regulations direct Lead agencies to consider incorporating mitigation measures that address or reduce those effects.⁷

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Executive Order (EO) 14096: *Revitalizing Our Nation's Commitment to Environmental Justice for All* supplements EO 12898: *Federal Actions to Address Environmental Justice in*

⁶ 40 CFR § 1502.16(a)(13)

⁷ 40 CFR § 1505.3(b)

Minority and Low-Income Populations. EO 14096 directs Federal agencies, as appropriate and consistent with applicable law, to identify, analyze, and address disproportionate and adverse human health and environmental effects (including risks) and hazards of Federal activities, including those related to climate change and cumulative effects of environmental and other burdens on communities with EJ concerns.

Under CEQ's NEPA Implementing Regulations⁸ and EO 14096, environmental justice is now evaluated based simply on disproportionate and adverse effects. The Fact Sheet⁹ accompanying EO 14096 states, *"The Executive Order [EO 14096] uses the term 'disproportionate and adverse' as a simpler, modernized version of the phrase 'disproportionately high and adverse' used in Executive Order 12898. Those phrases have the same meaning but removing the word 'high' eliminates potential misunderstanding that agencies should be only considering large disproportionate effects."* Ensure references reflect *"disproportionate and adverse"* as outlined in CEQ regulations and EO 14096.

Section 3(b)(i) of EO 14096 also directs EPA to assess whether each agency analyzes and avoids or mitigates disproportionate human health and environmental effects on communities with EJ concerns when carrying out responsibilities under Section 309 of the Clean Air Act, 42 U.S.C. 7609. EPA's recommendations below suggest opportunities to further analyze, disclose, and reduce effects to communities with EJ concerns.¹⁰

Recommendations for the SDEIS:

1. Identify the presence of communities with EJ concerns in the project area and within the broader area that could experience environmental impacts from the proposed project. Disclose demographic information and summarize input from community members.
2. Describe past activities and future plans to engage communities with EJ concerns during the environmental review and planning phase, and, if the project commences, during construction and operations.
3. Evaluate the impacts of this proposal on communities with EJ concerns and sensitive receptors (e.g., children, people with asthma, etc.).
4. Include an analysis and conclusion regarding whether the Project or any action alternatives may have disproportionate and adverse impacts on communities with EJ concerns, as specified in CEQ's Environmental Justice Guidance.¹¹ Identify what those effects may be and include measures that will be taken to avoid, minimize, or mitigate effects.
5. Compare project impacts to an appropriate reference community to determine whether there may be disproportionate impacts. Consider risk of exposure to hazardous/toxic

⁸ 40 CFR § 1502.16(a)(13)

⁹ FACT SHEET: President Biden Signs Executive Order to Revitalize Our Nation's Commitment to Environmental Justice for All. See <https://www.whitehouse.gov/briefing-room/statements-releases/2023/04/21/fact-sheet-president-biden-signs-executive-order-to-revitalize-our-nations-commitment-to-environmental-justice-for-all/>

¹⁰ For purposes of NEPA review, EPA considers a project to be in an area of potential EJ concern when the area shows one or more of the thirteen EJ indices at or above 80th percentile in the nation/state on EJScreen. However, scores under the 80th percentile should not be interpreted to mean there are definitively no EJ concerns present.

¹¹ CEQ's Environmental Justice Guidance Under the National Environmental Policy Act. See Section III, Part C-4.

https://www.epa.gov/sites/default/files/2015-02/documents/ej_guidance_nepa_ceq1297.pdf?VersionId=78iNGtdwSTz5E2x.H0aHq.E96_Tphbgd

materials associated with the proposed construction and operation and air quality and noise impacts due to construction.

6. Consider any disproportionate non-project-related pollution exposures that communities of concern may already be experiencing, as well as any disproportionate non-pollution stressors that may make the communities susceptible to pollution, such as health conditions, other social determinants of health, and disproportionate vulnerability related to climate change.
7. EJScreen can inform EJ and community outreach to identify potential meeting locations and any language barriers by providing information on linguistic isolation, languages spoken, and places of community cohesion (e.g., schools, places of worship), if applicable. EPA recommends DoA consider the following:
 - f) Discuss the meaningful involvement and targeted outreach undertaken by DoA in plain language and languages other than English spoken by residents in and/or near the Project area.
 - g) Utilize resources such as the Promising Practices for EJ Methodologies in NEPA Reviews Practices¹² report and the Community Guide to EJ and NEPA Methods¹³ to conduct an EJ analysis that appropriately engages in meaningful, targeted community outreach, analyzes effects, and advances environmental justice principles through NEPA implementation.
8. Establish material hauling routes away from places where children live, learn, and play, to the extent feasible. Consider homes, schools, daycares, and playgrounds. In addition to air quality benefits, careful routing may protect children from vehicle-pedestrian accidents. Identify potential material hauling routes in the SDEIS.

5. **CLIMATE CHANGE**

- A. Executive Order 14008: Tackling the Climate Crisis at Home and Abroad states, *"The United States and the world face a profound climate crisis. We have a narrow moment to pursue action...to avoid the most catastrophic impacts of that crisis and to seize the opportunity that tackling climate change presents."* The U.S. Global Change Research Program's National Climate Assessment provides data and scenarios that may be helpful in assessing trends in temperature, precipitation, and frequency and severity of storm events.¹⁴

Federal courts have consistently held that NEPA requires agencies to disclose and consider climate impacts in their reviews, including impacts from greenhouse gas (GHG) emissions. On January 9, 2023, the Council on Environmental Quality (CEQ) published interim guidance to assist Federal agencies in assessing and disclosing climate change impacts during environmental reviews.¹⁵ CEQ developed this interim guidance in response to Executive Order 13990 - *Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis*. This interim guidance was effective immediately. CEQ indicated that agencies should use this interim guidance to inform the NEPA review for all

¹² https://www.epa.gov/sites/default/files/2016-08/documents/nepa_promising_practices_document_2016.pdf

¹³ <https://www.energy.gov/sites/prod/files/2019/05/f63/NEPA%20Community%20Guide%202019.pdf>

¹⁴ Information on changing climate conditions is available through the National Climate Assessment at: <https://nca2023.globalchange.gov/>

¹⁵ <https://www.federalregister.gov/documents/2023/01/09/2023-00158/national-environmental-policy-act-guidance-on-consideration-of-greenhouse-gas-emissions-and-climate>

new proposed actions and may use it for evaluations in process, as agencies deem appropriate, such as informing the consideration of alternatives or helping address comments raised through the public comment process. EPA recommends that DoA apply the interim guidance as appropriate, to ensure robust consideration of potential climate impacts, mitigation, and adaptation issues.

In addition, estimates of the social cost of greenhouse gases (SC-GHG¹⁶) are informative for assessing the impacts of GHG emissions. SC-GHG estimates allow analysts to monetize the societal value of changes in GHG emissions from actions that have small, or marginal, impacts on cumulative global emissions. Estimates of the social cost of carbon (SC-CO₂) and other greenhouse gases (e.g., social cost of methane (SC-CH₄)) have been used for over a decade in Federal government analyses. Quantification of anticipated GHG releases and associated SC-GHG comparisons among all alternatives (including the No Action Alternative scenarios) within the SDEIS would inform project decision-making and provide clear support for implementing all practicable measures to minimize GHG emissions and releases.

EPA recommends that DoA review EPA's final technical report, "*Report on the Social Cost of Greenhouse Gases: Estimates Incorporating Recent Scientific Advances*¹⁷," which explains the methodology underlying the most recent set of SC-GHG estimates. To better assist lead Federal agencies with the utilization of these updated estimates, EPA has also recently released a Microsoft Excel "Workbook for Applying SC-GHG Estimates v.1.0.1" spreadsheet¹⁸ which was designed by EPA's National Center for Environmental Economics to help analysts calculate the monetized net social costs of increases in GHG emissions using the estimates of the SC-GHGs.

Recommendations for the SDEIS:

1. DoA should apply the interim guidance as appropriate, to ensure robust consideration of potential climate impacts, mitigation, and adaptation issues. Additional recommendations are as follows:
 - a) Emissions & SC-GHG Disclosure and Analysis:
 - i. Quantify estimates of all direct and indirect GHG emissions¹⁹ from the proposed project over its anticipated lifetime for all alternatives, including the No Action Alternative, broken out by GHG type.
 - ii. Include a detailed discussion of the project's reasonably foreseeable direct and indirect GHG emissions in the context of actions necessary to achieve Illinois' policies and GHG emission reduction goals²⁰ as well as national policy and GHG

¹⁶ EPA uses the general term, "social cost of greenhouse gases" (SC-GHG), where possible because analysis of GHGs other than CO₂ are also relevant when assessing the climate damages resulting from GHG emissions. The social cost of carbon (SC-CO₂), social cost of methane (SC-CH₄), and social cost of nitrous oxide (SC-N₂O) can collectively be referenced as the SC-GHG.

¹⁷ https://www.epa.gov/system/files/documents/2023-12/epa_scghg_2023_report_final.pdf

¹⁸ <https://www.epa.gov/environmental-economics/scghg>

¹⁹ As discussed in Section IV(A) of CEQ's 2023 interim guidance, "agencies generally should quantify all reasonably foreseeable emissions associated with a proposed action and reasonable alternatives (as well as the no-action alternative). Quantification should include the reasonably foreseeable direct and indirect GHG emissions of their proposed actions. Agencies also should disclose the information and any assumptions used in the analysis and explain any uncertainty. In assessing a proposed action's, and reasonable alternatives', reasonably foreseeable direct and indirect GHG emissions, the agency should use the best available information."

²⁰ Including, but not limited to, the goals for Illinois laid out here: https://www2.illinois.gov/IISNews/23893-Climate_and_Equitable_Jobs_Act.pdf

emission reduction goals over the anticipated project lifetime, including the U.S. 2030 Paris targets and the 2050 goal for net-zero energy emissions.

- iii. Use SC-GHG estimates to disclose and consider the climate damages from net changes in direct and indirect emissions of CO₂ and other GHGs resulting from the proposed project. To do so, EPA recommends a breakdown of estimated net GHG emission changes by individual gas, rather than relying on CO₂-equivalent (CO₂e) estimates, and then monetize the climate impacts associated with each GHG using the corresponding social cost estimate (e.g., monetize CH₄ emissions changes expected to occur with the social cost of methane (SC-CH₄) estimate for emissions).²¹ When applying SC-GHG estimates, just as with tools to quantify emissions, DoA should disclose the assumptions (e.g., discount rates) and uncertainties associated with such analysis and the need for updates over time to reflect evolving science and economics of climate impacts.
 - iv. Use comparisons of GHG emissions and SC-GHG across alternatives to inform project decision-making.
- b) Resilience and Adaptation
- i. Describe changing climate conditions (e.g., temperatures and frequency and severity of storm events) and assess how such changes could impact the proposed project and the environmental impacts of the proposed project and alternatives.
 - ii. Incorporate robust climate resilience and adaption considerations into (1) project design and engineering; (2) construction oversight; (3) commitments for protective measures related to stormwater and erosion; and (4) routine monitoring. The SDEIS should describe how DoA has addressed such considerations and provide a rationale for any reasonable alternatives to enhance resilience that were not adopted or discussed in detail.
- c) Reduction and Mitigation
- i. Identify practices to reduce and mitigate GHG emissions; include commitments by DoA and LRA to do so in the SDEIS. We recommend DoA consider practices in the enclosed Construction Emission Control Checklist.
 - ii. Analyze best available control strategies, while considering low sensitive environmental and health receptors (e.g., schools and play areas along truck travel routes).

6. ENERGY EFFICIENCY AND ENVIRONMENTAL BEST PRACTICES

- A. Energy efficient design and material selection could reduce operations costs and promote a high-quality work environment, while also better protecting the environment. Recycling construction debris also preserves valuable landfill space and makes use of materials that have high embodied energy.

²¹ Transforming gases into CO₂e using Global Warming Potential (GWP) metrics, and then multiplying the CO₂e tons by the SC-CO₂, is not as accurate as a direct calculation of the social costs of non-CO₂ GHGs. This is because GHGs differ not just in their potential to absorb infrared radiation over a given time frame, but also in the temporal pathway of their impact on radiative forcing and in their impacts on physical endpoints other than temperature change, both of which are relevant for estimating their social cost but not reflected in the GWP. See the Interagency Working Group on Social Cost of Greenhouse Gases' February 2021 *Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide Interim Estimates under Executive Order 13990* for more discussion and the range of annual SC-CO₂, SC-CH₄, and SC-N₂O estimates currently used in Federal benefit-costs analyses.

Recommendations for the SDEIS:

1. Achieving Leadership in Energy & Environmental Design (LEED) certification at the platinum level (or design for net-zero energy usage) for any new buildings associated with the project. Best practices for energy efficiency and sustainable building design can include the use of energy-efficient building materials, such as south-facing skylights and windows, motion sensed lighting, solar, wind, and/or geothermal power, and Energy Star certified windows and doors. In addition to reducing the overall environmental footprint, green building certification programs promote health by encouraging practices that protect indoor air quality. At a minimum, EPA encourages DoA to commit to analyze the strengths and feasibility of these strategies.
2. Constructing proposed roads, parking lots, sidewalks, or other surfaces slated for driving or walking with using permeable pavement or porous pavers to reduce runoff.
3. Identifying and implementing of opportunities for additional green stormwater management practices. Opportunities include, but are not limited to, green roofs, bioswales, and rain gardens.
4. Ensuring areas around all new buildings associated with the project which are not planned for operations be considered for conversion to native habitats, increasing the area which can be beneficially used for wildlife, stormwater infiltration or detention, and aesthetics, among other functions.
5. Discussing to what extent DoA will require energy efficiency measures, greenhouse gas reductions, and other sustainability measures, per Executive Order 14057.
6. Incorporating electric vehicle charging stations in new parking areas and designating priority parking spots for carpools and low emission vehicles.
7. Committing to recycle a high percentage of construction and demolition debris.
8. Replacing raw materials with recycled materials for infrastructure components. Options include, but are not limited to:
 - a) Using recycled materials to replace carbon-intensive Portland Cement in concrete as “supplementary cementitious material;”
 - b) Using tire-derived aggregate in lightweight embankment fill and retaining wall backfill; and
 - c) Using recycled materials in pavement applications, such as crushed recycled concrete, recycled asphalt pavement, and rubberized asphalt concrete. Also, in some circumstances, demolished onsite asphalt can be re-used (e.g., cold in-place recycling or full depth reclamation).

7. NATURAL FEATURES

- A. The Refuge borders Parcel 20 on three side that includes all water access routes to the Mississippi River. It appears that proposed re-use will extend into Refuge lands.

Recommendations for the SDEIS:

1. Discuss coordination with the U.S. Fish and Wildlife Service regarding potential impacts to the Refuge and whether proposed activities are compatible uses of Refuge lands and waters. Consider activities associated with construction (e.g., installing utilities on Refuge lands) as well as operation of proposed features.

2. Discuss potential impact to Federally-listed threatened or endangered species listed in Table ES-2. The fact that critical habitat has not been designated for these species does not equate to an analysis of potential impacts to the species themselves as a result of the proposed re-use plan. In particular, consider impacts to mussel species.

8. NON-NATIVE INVASIVE SPECIES (NNIS)

- A. Based on the proximity of the project area to the Refuge and the Mississippi River, the potential for the proposed project to spread terrestrial and aquatic NNIS is high. Care needs to be taken to reduce the spread of NNIS during project planning and implementation.

Recommendations for the SDEIS:

1. Provide baseline information pertaining to current locations and acreages of terrestrial and aquatic NNIS on project lands.
2. Discuss how the project will comply with Executive Order 13112 – Safeguarding the Nation from the Impacts of Invasive Species. include a discussion of standard best management practices (e.g., washing construction equipment) that will be used to eliminate the spread of NNIS into, as well as out of, the project area.
3. Assuming NNIS are present in the project area, discuss measures that can be taken to control or eradicate existing populations, ideally before earthmoving activities begin.

9. CUMULATIVE IMPACTS ANALYSIS

- A. Development along the Mississippi River has a lengthy history. Cumulative impacts are impacts resulting from the proposed action's incremental impacts when added to the impacts of other past, present, and reasonably-foreseeable future actions, including those under the control of other entities.

Recommendations for the SDEIS:

1. Discuss potential direct, indirect, and cumulative impacts to resources in the project area that could be affected by the proposed project.
2. Consider reasonably-foreseeable impacts as a result of the proposed project (e.g., roadway improvements, induced growth, etc.). Regional or county-wide smart growth or land use plans should inform the discussion of induced growth and cumulative impacts.

10. PERMITTING

- A. The SDEIS should include a list of all Federal, state, and local permits that will be required to undertake the preferred alternative. For all environmental impact categories requiring coordination with other Federal and state resource agencies, EPA recommends copies of both your letters to those agencies, as well as the responses from those agencies, be provided as appendices to the SDEIS.

11. **INTERAGENCY COORDINATION**

- A. Implementation of NEPA requires interagency coordination with multiple stakeholders, including Federal and state resource agencies, Tribes, local governments, and affected landowners.

Recommendations for the SDEIS:

1. Include copies of all interagency coordination sent to, and received from Federal and state resource agencies, Tribes, and local municipalities.
2. Include a list of all Federal, state, and local permits that would be required to undertake the Preferred Alternative.

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12. **OTHER COMMENTS**

- A. The SDEIS should indicate how comments received during the scoping period were addressed.

Recommendations for the SDEIS:

1. Create an appendix that include all comments received during the SDEIS scoping period, including any applicable transcripts of comments from the public.
2. Create an appendix that includes all correspondence sent to and received from government agencies regarding the proposed project.
3. Create a chart that lists the following:
 - a) all comments received during the SDEIS review period;
 - b) DoA's response with a reference to the section that was changed as a result of the comment, if applicable. Include section and page number for ease of reference; and
 - c) associated mitigation efforts with responsible entity.
4. EPA recommends all technical terms be explained in plain language in the SDEIS.
5. We recommend DoA access the following databases to obtain environmental information related to the project area:
 - a) WATERS²²: <https://www.epa.gov/waterdata/waters-watershed-assessment-tracking-environmental-results-system>
 - b) Envirofacts²³: <https://www3.epa.gov/enviro/facts/multisystem.html>
 - c) EJSCREEN: <https://www.epa.gov/ejscreen>
 - d) NEPAassist: <https://www.epa.gov/nepa/nepassist>
 - e) CWA 303(d) Listed Impaired Waters: <https://epa.illinois.gov/topics/water-quality/watershed-management/tmdls/303d-list.html>
 - f) National Ambient Air Quality Standards status: https://www3.epa.gov/airquality/greenbook/anayo_il.html

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²² The **Watershed Assessment, Tracking & Environmental Results System (WATERS)** unites water quality information previously available only from several independent and unconnected databases.

²³ Includes enforcement and compliance information.

U.S. Environmental Protection Agency **Construction Emission Control Checklist**

Diesel emissions and fugitive dust from project construction may pose environmental and human health risks and should be minimized. In 2002, EPA classified diesel emissions as a likely human carcinogen, and in 2012 the International Agency for Research on Cancer concluded that diesel exhaust is carcinogenic to humans. Acute exposures can lead to other health problems, such as eye and nose irritation, headaches, nausea, asthma, and other respiratory system issues. Longer term exposure may worsen heart and lung disease.²⁴ We recommend DoA consider the following protective measures and commit to applicable measures in the SDEIS.

Mobile and Stationary Source Diesel Controls

Purchase or solicit bids that require the use of vehicles that are equipped with zero-emission technologies or the most advanced emission control systems available. Commit to the best available emissions control technologies for project equipment in order to meet the following standards.

- On-Highway Vehicles: On-highway vehicles should meet, or exceed, the EPA exhaust emissions standards for model year 2010 and newer heavy-duty, on-highway compression-ignition engines (e.g., long-haul trucks, refuse haulers, shuttle buses, etc.).²⁵
- Non-road Vehicles and Equipment: Non-road vehicles and equipment should meet, or exceed, the EPA Tier 4 exhaust emissions standards for heavy-duty, non-road compression-ignition engines (e.g., construction equipment, non-road trucks, etc.).²⁶
- Marine Vessels: Marine vessels hauling materials for infrastructure projects should meet, or exceed, the latest EPA exhaust emissions standards for marine compression-ignition engines (e.g., Tier 4 for Category 1 & 2 vessels, and Tier 3 for Category 3 vessels).²⁷
- Low Emission Equipment Exemptions: The equipment specifications outlined above should be met unless: 1) a piece of specialized equipment is not available for purchase or lease within the United States; or 2) the relevant project contractor has been awarded funds to retrofit existing equipment, or purchase/lease new equipment, but the funds are not yet available.

Consider requiring the following best practices through the construction contracting or oversight process:

- Use onsite renewable electricity generation and/or grid-based electricity rather than diesel-powered generators or other equipment.
- Use electric starting aids such as block heaters with older vehicles to warm the engine.
- Regularly maintain diesel engines to keep exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance (e.g., blue/black smoke indicates that an engine requires servicing or tuning).
- Where possible, retrofit older-tier or Tier 0 nonroad engines with an exhaust filtration device before it enters the construction site to capture diesel particulate matter.

²⁴ Benbrahim-Tallaa, L, Baan, RA, Grosse, Y, Lauby-Secretan, B, El Ghissassi, F, Bouvard, V, Guha, N, Loomis, D, Straif, K & International Agency for Research on Cancer Monograph Working Group (2012). Carcinogenicity of diesel-engine and gasoline-engine exhausts and some nitroarenes. The Lancet. Oncology, vol. 13, no. 7, pp. 663-4. Accessed online from:

https://kclpure.kcl.ac.uk/portal/files/6492297/coverBenbrahim_Tallaa_2012_Lancet_Oncology.pdf

²⁵ <https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-heavy-duty-highway-engines-and-vehicles>

²⁶ <https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-nonroad-engines-and-vehicles>

²⁷ <https://www.epa.gov/emission-standards-reference-guide/all-epa-emission-standards>

- Replace the engines of older vehicles and/or equipment with diesel- or alternatively-fueled engines certified to meet newer, more stringent emissions standards (e.g., plug-in hybrid-electric vehicles, battery-electric vehicles, fuel cell electric vehicles, advanced technology locomotives, etc.), or with zero emissions electric systems. Retire older vehicles, given the significant contribution of vehicle emissions to the poor air quality conditions. Implement programs to encourage the voluntary removal from use and the marketplace of pre-2010 model year on-highway vehicles (e.g., scrappage rebates) and replace them with newer vehicles that meet or exceed the latest EPA exhaust emissions standards, or with zero emissions electric vehicles and/or equipment.

Fugitive Dust Source Controls

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative, where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
- Install wind fencing and phase grading operations where appropriate and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

Occupational Health

- Reduce exposure through work practices and training, such as maintaining filtration devices and training diesel-equipment operators to perform routine inspections.
- Position the exhaust pipe so that diesel fumes are directed away from the operator and nearby workers, reducing the fume concentration to which personnel are exposed.
- Use enclosed, climate-controlled cabs pressurized and equipped with high-efficiency particulate air (HEPA) filters to reduce the operators' exposure to diesel fumes. Pressurization ensures that air moves from inside to outside. HEPA filters ensure that any incoming air is filtered first.
- Use respirators, which are only an interim measure to control exposure to diesel emissions. In most cases, an N95 respirator is adequate. Workers must be trained and fit-tested before they wear respirators. Depending on the type of work being conducted, and if oil is present, concentrations of particulates present will determine the efficiency and type of mask and respirator. Personnel familiar with the selection, care, and use of respirators must perform the fit testing. Respirators must bear a National Institute for Occupational Safety and Health approval number.

NEPA Documentation

- Per Executive Order 13045 on Children's Health,²⁸ EPA recommends the lead agency and project proponent pay particular attention to worksite proximity to places where children live, learn, and play, such as homes, schools, and playgrounds. Construction emission reduction

²⁸ Children may be more highly exposed to contaminants because they generally eat more food, drink more water, and have higher inhalation rates relative to their size. Also, children's normal activities, such as putting their hands in their mouths or playing on the ground, can result in higher exposures to contaminants as compared with adults. Children may be more vulnerable to the toxic effects of contaminants because their bodies and systems are not fully developed, and their growing organs are more easily harmed. EPA views childhood as a sequence of life stages, from conception through fetal development, infancy, and adolescence.

measures should be strictly implemented near these locations in order to be protective of children's health.

- Specify how impacts to sensitive receptors, such as children, elderly, and the infirm will be minimized. For example, locate construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.

From: [Goers, Nicole \(she/her/hers\)](#)
To: [Cannella, Michelle](#)
Cc: [Lineer, Thomas A CIV USARMY HQDA DCS G-9 \(USA\)](#); [William.T.Knuth.civ@army.mil](#); [casey.k.potts@usace.army.mil](#); [Hand, Joseph H CIV USARMY CESAM \(USA\)](#); [Hayes, Beverly](#)
Subject: RE: SVADA LRA Parcel 20 BRAC EA: Initial Consultation Letter
Date: Tuesday, December 19, 2023 1:19:44 PM

Michelle,

Thank you for providing this document so quickly.

Nicole Goers, PE
 Remedial Project Manager, Remedial Response Section 5
 Superfund & Emergency Management Division
 U.S. EPA, Region 5
 77 W. Jackson Blvd. (SR-6J)
 Chicago, IL 60604
 312.886.1486
goers.nicole@epa.gov

To love a place is not enough. We must find ways to heal it. - Robin Wall Kimmerer

From: Cannella, Michelle <Michelle.Cannella@tetrattech.com>
Sent: Tuesday, December 19, 2023 9:50 AM
To: Goers, Nicole (she/her/hers) <Goers.Nicole@epa.gov>
Cc: Lineer, Thomas A CIV USARMY HQDA DCS G-9 (USA) <thomas.a.lineer.civ@army.mil>; William.T.Knuth.civ@army.mil; casey.k.potts@usace.army.mil; Hand, Joseph H CIV USARMY CESAM (USA) <Joseph.H.Hand@usace.army.mil>; Hayes, Beverly <Beverly.Hayes@tetrattech.com>
Subject: SVADA LRA Parcel 20 BRAC EA: Initial Consultation Letter

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Good morning Ms. Goers,

Per the email chain below, attached is an initial consultation letter in regards to the proposed BRAC action at SVADA LRA Parcel 20. The first draft of the EA for this action is in preparation; the NEPA 30-day EA public review period is scheduled for spring 2024. For your situational awareness, a coordination letter also was sent by the U.S. Army to Ms. Krystle McClain, NEPA Program Supervisor, US EPA Region 5, 77 West Jackson Blvd., Chicago, IL 60604.

Sincerely,

Michelle

Ms. Michelle Cannella | Environmental Scientist | Tetra Tech

008a

Direct +1 (703) 385-1218 | Business +1 (703) 385-6000 | michelle.cannella@tetrattech.com

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From: Knuth, William T CIV USARMY HQDA DCS G-9 (USA) <william.t.knuth.civ@army.mil>
Sent: Tuesday, December 19, 2023 8:14 AM
To: Cannella, Michelle <Michelle.Cannella@tetrattech.com>
Subject: FW: SVAD - EA Letter

Hi Michelle,

USEPA Region 5 Superfund has jurisdiction at Savanna for our environmental clean up under BRAC. As you can see below they were contacted by one of the tribal organizations and were caught off guard. I know a letter went to another section of the EPA office but can you please send out an for awareness a copy of the EA letter to:

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Nicole Goers, PE
Remedial Project Manager, Remedial Response Section 5
Superfund & Emergency Management Division
U.S. EPA, Region 5
77 W. Jackson Blvd. (SR-6J)
Chicago, IL 60604
312.886.1486
goers.nicole@epa.gov

Respectfully,

Todd Knuth
Base Environmental Coordinator
Savanna Army Depot Activity
HQDA DCS G-9
Office: 815-273-8312
Mobile: 202-815-6075

From: Lineer, Thomas A CIV USARMY HQDA DCS G-9 (USA) <thomas.a.lineer.civ@army.mil>
Sent: Monday, December 18, 2023 4:27 PM
To: Knuth, William T CIV USARMY HQDA DCS G-9 (USA) <william.t.knuth.civ@army.mil>
Subject: FW: SVAD - EA Letter

Todd:

Please reach out to Nicole and address/provide her the information that she is requesting.

Thank you,

Tom

From: Goers, Nicole (she/her/hers) <Goers.Nicole@epa.gov>

Sent: Monday, December 18, 2023 3:23 PM

To: Lineer, Thomas A CIV USARMY HQDA DCS G-9 (USA) <thomas.a.lineer.civ@army.mil>

Subject: [Non-DoD Source] SVAD - EA Letter

Tom,

Last Friday I received a call from someone in our Tribal and Multi-Media Programs office regarding an Environmental Assessment (EA) at Savanna Army Depot Activity. They did not have an electronic copy of the document to share with me so I don't know much more about it.

Can you provide me with a copy for review? Do you know why a copy wasn't provided to me/Superfund?

If there is someone else I should be reaching out to regarding obtaining a copy of this EA, please let me know.

Thank you in advance,

Nicole Goers, PE
Remedial Project Manager, Remedial Response Section 5
Superfund & Emergency Management Division
U.S. EPA, Region 5
77 W. Jackson Blvd. (SR-6J)
Chicago, IL 60604
312.886.1486
goers.nicole@epa.gov

To love a place is not enough. We must find ways to heal it. - Robin Wall Kimmerer

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United States Department of the Interior

FISH AND WILDLIFE SERVICE
Upper Mississippi River National Wildlife and Fish Refuge
7071 Riverview Road
Thomson, Illinois 61285
September 6, 2024



Thomas Lineer, BRAC Program Manager
Department of Army
Attn: Todd Knuth, Base Environmental Coordinator
Savanna Army Depot Activity
18935 B Street
Savanna, Illinois 61074

Subject: U.S. Fish and Wildlife Service scoping comments on Supplemental Environmental Impact Statement for Parcel 20

Dear Mr. Lineer:

Thank you for the opportunity to provide U.S. Fish and Wildlife Service scoping comments from the Upper Mississippi River National Wildlife and Fish Refuge (Refuge) on Army's Supplemental Environmental Impact Statement for Jo-Carroll Depot Local Redevelopment Authority's (LRA) proposed Final Reuse Plan for Parcel 20. The Refuge previously provided comments on January 3, 2024 (attached), related to the Army's Environmental Assessment for this project. All our concerns that were expressed earlier are still present. The Final Reuse Plan for Parcel 20 includes commercial development of a port terminal, habitat alteration and barge fleeting within the Refuge. The LRA will need to submit documentation that addresses statutory requirements that preclude the use of these Federal lands for port and fleeting facilities, as these proposed plans are in violation of numerous Federal laws, most directly but not limited to the National Wildlife Refuge Improvement Act of 1997.

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In addition to the 19 specific comments previously identified in the January 3, 2024, letter, there is an additional concern that will need to be addressed. The side channel located south of Brickhouse Slough is identified in the Final Reuse Plan as the access corridor for towboat and barge entry to Parcel 20. A portion of the east shoreline of this slough (adjacent River Mile 544) is a designated Environmentally Sensitive Area (Site 13-E-4) by the Army Corps of Engineers due to its archeological significance. I have attached a map of the area that is identified in the Army Corps of Engineers' Master Plan dated March 2022. The shoreline is a steep sand bank that is highly erosional. Wave wash from towboat and barge traffic may impact this significant archeological site.

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The Refuge is requesting an agency meeting separate from the public scoping meeting to discuss our concerns.

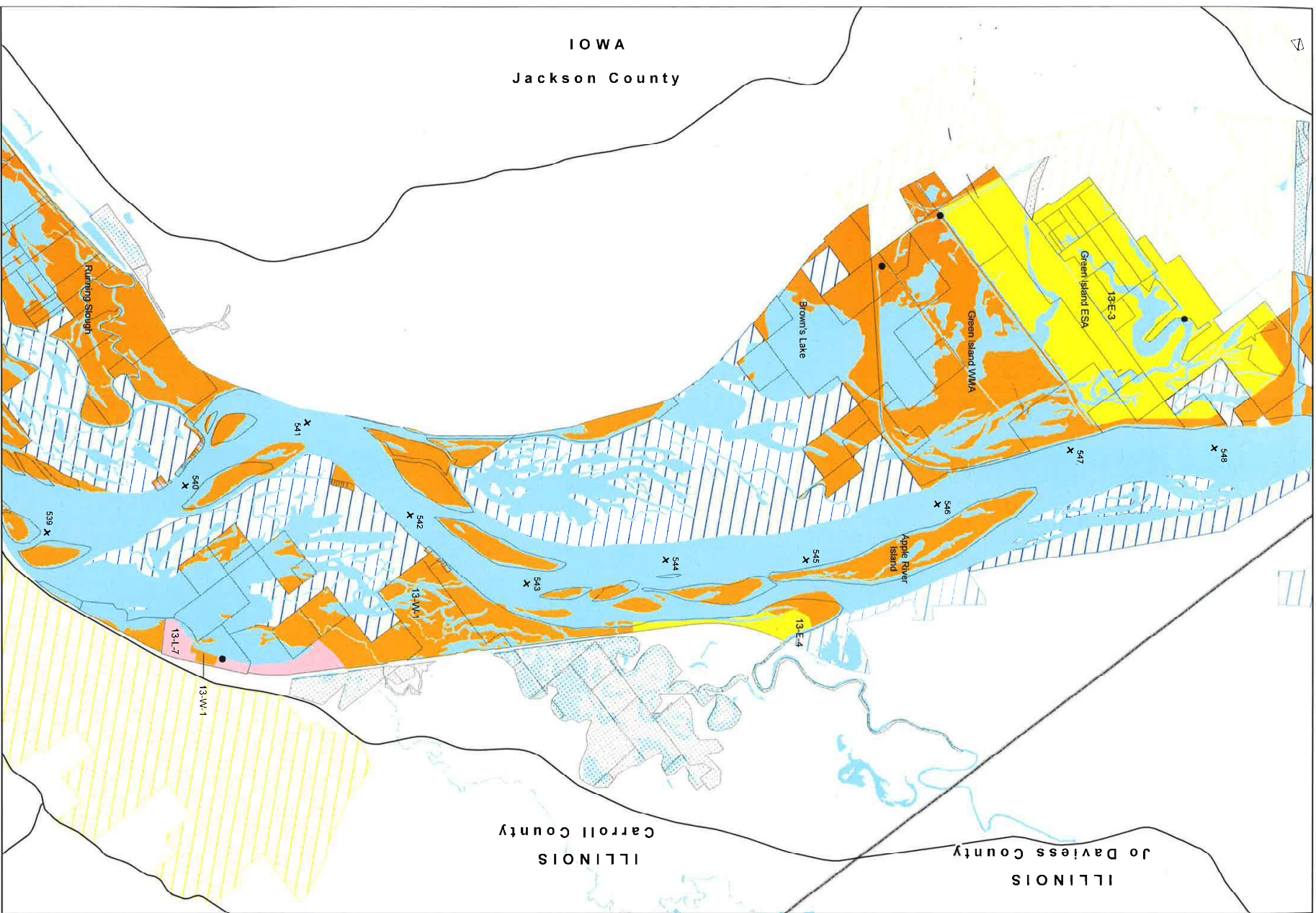
009c

Thank you for the opportunity to comment and participate in preparation for Army's Supplemental Environmental Impact Statement for the reuse of Parcel 20. Please let me know if you have questions or need additional information. You can contact me at the above address, telephone 815-273-2732 or email: ed_britton@fws.gov.

Sincerely,

Ed Britton

Ed Britton, Savanna District Manager
Upper Mississippi River National Wildlife and Fish Refuge
U.S. Fish and Wildlife Service



IOWA
Jackson County

ILLINOIS
Jo Daviess County

ILLINOIS
Carroll County

Master Plan Land Classification*

- Boat Access
- ▬ USACE District Boundary
- ▬ County Line
- + River Mile
- ▬ Corps Acquired Tracts
- ▬ Corps Easement on Private Land

- Environmentally Sensitive Areas
- High Density Recreation
- Low Density Recreation
- Project Operations
- Vegetative Management
- Wildlife Management

- Other Public Lands
- IL DNR Owned Public Lands
- USFWS Owned Public Lands
- IA DNR Owned Public Lands
- MO DOC Owned Public Lands

Mississippi River Project
Master Plan - Mar 2022
Pool 13
River Mile 548 - 539
Classification Plate 9 of 36

0.5 0.25 0 0.5 Miles

* See disclaimer & information at the beginning of map set.



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Upper Mississippi River National Wildlife and Fish Refuge
7071 Riverview Road
Thomson, Illinois 61285
January 3, 2024



Mr. Thomas Lineer
BRAC Program Manager
Attn: Todd Knuth
Base Environmental Coordinator
Savanna Army Depot Activity
18935 B Street
Savanna, Illinois 61285

Dear Mr. Lineer:

Thank you for the opportunity to provide U.S. Fish and Wildlife Service (USFWS) comments from the Upper Mississippi River National Wildlife and Fish Refuge (Refuge) on Army's Environmental Assessment of Jo-Carroll Depot Local Redevelopment Authority's (LRA) proposed Final Reuse Plan for Parcel 20 that identifies construction of a port terminal and barge fleeting. Parcel 20 contains 132 acres that is bordered by federal property. These comments identify environmental concerns related to Parcel 20 and to the USFWS Refuge that lies adjacent to Parcel 20. USFWS Ecological Services has also provided comments related to the Endangered Species Act and the Fish and Wildlife Coordination Act and that letter is attached here. Also enclosed with this correspondence is a previous letter notifying the LRA that this proposal is in violation of federal laws.

Construction of a port terminal and barge fleeting cannot be completed solely within Parcel 20 because there must be connection to the Mississippi River. The Refuge borders Parcel 20 on the north, south and west sides that includes all water access routes to the river. The proposed project will extend into USFWS and U.S. Army Corps of Engineers (USACE) Rock Island District owned fee title lands and river bottom jurisdiction. Army's Environmental Assessment of LRA's Final Reuse Plan for Parcel 20 will need to consider the environmental impacts to lands and waters within two federal agency's properties, Department of Interior and Department of Army.

The LRA's Final Reuse Plan for Parcel 20 identifies the following project features to be constructed within USFWS fee title lands and river bottom jurisdiction: dry bulk/liquid bulk wharf (800 lineal feet); liquid bulk pipeline; floating dry dock; wharf access road; conveyor system that extends to wharf and dock; barge fleeting along the east and west shorelines of Apple River Island, and; extensive dredging (approximately 400,000 cubic yards) within Brickhouse Slough extending three miles south along a backwater channel to connect to the Mississippi River. The LRA will need to submit documentation that addresses statutory requirements that preclude the use of these Federal lands for port and fleeting facilities, as these proposed plans are in violation of numerous federal laws, most directly but not limited to, the National Wildlife Refuge Improvement Act of 1997.

The following comments are provided for LRA's Final Reuse Plan for Parcel 20.

Pages ii-iii and pages 17-18, Table ES-2 EcoCat and IPAC Species Summary List for Parcel 20:

USFWS comment: These tables identify several federally endangered or threatened species may be present within Parcel 20 but “No critical habitat has been designated for this species.” A significant part of the project extends into the federally owned National Wildlife Refuge in areas where federally listed species have been previously documented. The protection of Federally Listed species is a primary objective of the Refuge. The LRA will need to produce compliance documents that outline how they intend to accomplish compliance within statutory requirements.

Page 3, Section 1.2.3 Previous Studies: The plan assessed the potential “...to understand the operational considerations for port development in Brickhouse Slough, the waterway immediately adjacent to the lower post area of the Savanna Industrial Park....”

USFWS comment: A port terminal was previously proposed by the LRA at this location. In December 1996, the LRA’s “Savanna Army Depot Reuse Plan and Implementation Strategy” identified development of a “Port Terminal”. The Reuse Plan specifically (page 178) identified “...An ecological port feasibility study has been proposed to identify the optimal siting for it. The US Fish and Wildlife Service will assist the LRA to define a scope of work for the port study....” The LRA consulted with state and federal regulators prior to intensive planning. During the period March – October 1997, the LRA’s Environmental Committee held regular meetings that included consultants Black & Veatch and MSA Professional Services, staff from state and federal agencies including USACE, USFWS, Illinois Department of Natural Resources, Savanna Army Depot Activity, and a commercial navigation advisor.

The committee identified several concerns for developing a port terminal in this section of the Mississippi River that included: 55 wing dams are present along the 16 mile stretch of river extending north (to Lock & Dam 12) and south of the proposed port site; 15 wing dams are present in the adjacent 5 mile stretch of river where the port terminal was proposed and located on both sides (Illinois & Iowa) of the main channel; these wing dams restrict barge navigability and would not allow concentrated barge traffic, especially considering Lock & Dam 12 is located nearby, and; the Mississippi River main channel is relatively narrow and there are no shoreline fleeting or mooring areas available for barges along this section of river.

On October 30, 1997, the LRA announced a barge terminal was not ecologically feasible due to the constraints identified by their Environmental Committee. Neither a draft report nor a final report was distributed to committee members detailing the investigation and recommendation because the LRA would no longer continue with the shoreline study and wanted to avoid paying additional costs to prepare a report.

LRA is aware of the 1996 Reuse Plan proposal for the construction of a port terminal and barge fleeting but has not addressed the environmental concerns previously identified by their Environmental Committee in 1997. I was an advisor to the Environmental Committee in 1997 and I am a current member of the LRA’s Technical Advisory Committee. I have reminded the LRA of the environmental concerns previously identified by their Environmental Committee in 1997 but no action has been taken to address these concerns that extend outside of Parcel 2, encroach upon federal lands, and would impact wing dams, closing structures, water flows and commercial navigation.

Page 9, Figure 3.1 - Parcel 20 Infrastructure Map: The utilities map extends onto USFWS fee title lands and river bottom jurisdiction.

USFWS comment: The LRA has not consulted with USFWS for placing utilities on lands and waters within this federal agency’s jurisdiction and it is likely this proposal will not be allowed within the constraints of existing federal law.

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USFWS comment: In addition to a Biological Assessment, a review of Finding of Appropriateness will be required as outlined in the National Wildlife Refuge System Improvement Act of 1997 since this proposal impacts National Wildlife Refuge lands. Federal law prohibits the construction and operation of this type of commercial facility on National Wildlife Refuges.

Page 21, Section 3.8.11 Parcel 20 Floodplain Mapping: The entire study area is located within the 100-year floodplain.

USFWS comment: A large solar array system is identified for construction within the floodplain (page 68, Section 8.1 Conceptual Alternatives and per Army correspondence). The LRA will need to identify a plan to prevent damage to the solar array system from large floating debris, such as dead trees, that may result in debris being scattered throughout adjacent federal lands.

Page 29, Section 5 Commercial and Industrial Market Analysis: “...current USFWS ownership of the waterfront portions of the property, marine cargo uses are not currently accommodated...The upper Mississippi River...is managed through a series of locks and dams to control water flows...every effort will be made to minimize and mitigate unavoidable site impacts...”

USFWS comment: The LRA has not consulted with USFWS to construct a port terminal and provide barge fleeting on this federally owned property. Federal law prohibits the construction and operation of this type of commercial facility on National Wildlife Refuges. The plan does not identify how the LRA will minimize and mitigate unavoidable impacts to USACE jurisdictional operations to include impacts to wing dams, closing structures, water flows and commercial navigation.

Page 30, Section 5.1 Technical Approach: The LRA’s Technical Approach identified market opportunities analysis to create alternative layouts and concepts for potential development and operation of marine cargo facilities.

USFWS comment: There has been no consultation with USFWS to identify the challenges for potential development and operation of marine cargo facilities within federal fee title lands and river bottom jurisdiction. Federal law prohibits the construction and operation of this type of commercial facility on National Wildlife Refuges.

Page 45, Section 5.7.2 SWOT Assessment: A “Weakness” is identified as “nearby protected environmental areas”. An “Opportunity” is identified as “Federal agencies support.”

USFWS comment: The assessment does not identify a “Weakness” related to the potential for impacting commercial navigation on the Mississippi River due to the presence of wing dams, narrow main channel, and the proposed barge fleeting on the west shoreline of Apple River Island. The “Opportunity” to gain “Federal agencies support” should have started with consultation with federal agencies several years ago when the planning for this project started. It is likely that federal law will prevent the use of these lands for the proposed purposes and that should be acknowledged/addressed in this proposal. Under Section 2(a) and 2(b) of the Fish and Wildlife Coordination Act, “...whenever the waters of any stream or waterbody are proposed or authorized to be...modified for any purpose whatever, ...by any department or agency of the United States, or by any

public or private agency under Federal permit or license, such department or agency first shall consult with the United States Fish and Wildlife Service and with the head of the agency exercising administration over the wildlife resources of the particular State... ” As such, this requires timely notification to the Service and state conservation agency concerning the proposed project to ensure “...that wildlife conservation shall received equal consideration and be coordinated with other features of water-resource development programs through effectual and harmonious planning....” This Final Reuse Plan proposal is the first occurrence of direct coordination with USFWS since project initiation. Due to the project’s positioning within and adjacent to areas owned and managed as part of the Upper Mississippi River National Wildlife and Fish Refuge and documented protected species are present within the project area, USFWS recommends timely initiation of coordination with Refuge staff to better understand limitations of use of these federally protected lands.

Page 60, Section 7.2.1 Stakeholder Identification: “A list of key stakeholders was developed in close coordination with the LRA. The list includes tenants, resource agencies....”

USFWS comment: USFWS is a key stakeholder since a large part of the project extends onto federal agency lands and river bottom jurisdiction. USFWS has provided many comments and concerns on this project dating back to the 1996 Reuse Plan. A May 22, 2017, letter (see attachment) was sent to consultant Linda Balcom once again expressing these concerns. Ms. Balcom is currently a consultant (Balcom Environmental Services) for the LRA and was a major contributor to this Final Reuse Plan for Parcel 20. The LRA has not addressed USFWS concerns expressed in the past nor within this present Final Reuse Plan for Parcel 20.

Page 61, Section 7.2.2 Technical Advisory Committee: Two TAC meetings have been held to discuss the Final Reuse Plan for Parcel 20 to construct a port terminal and provide barge fleeting.

USFWS comment: I am a member of the TAC, have attended both meetings, and provided USFWS concerns about this proposed plan that encroaches upon USFWS lands and river bottom jurisdiction. The LRA has made no attempt to consult with USFWS to address these concerns.

Page 65, Section 7.2.6 Public and TAC input: “Concerns” section identifies “Dredging and environmental issues in Brickhouse Slough...Wing dams in the vicinity of Apple Island...Impacts to wetlands...Development in floodplain....”

USFWS comment: The “Concerns” section does not identify that a large part of the Final Reuse Plan for Parcel 20 extends onto lands and river bottom jurisdiction of two federal agencies, Department of Interior and Department of Army, and lands owned and managed as National Wildlife Refuge. There has been no effort by LRA to address the “Concerns” issues despite several years of planning.

Page 67, Section 8 Redevelopment Alternatives: The plan identifies there are “environmental and ecological considerations and constraints” due to the project lies within the Upper Mississippi River National Wildlife and Fish Refuge.

USFWS comment: Several years of planning have gone into completion of the LRA’s Final Reuse Plan for Parcel 20. LRA is aware the project will extend onto the Refuge and will impact federal lands and river bottom jurisdiction. The National Wildlife Refuge System Improvement Act of 1997 prohibits commercial use of National Wildlife Refuges. However, no effort has been made to consult with USFWS to discuss federal laws that prohibit these activities. Planning has also proceeded without addressing significant concerns identified during the LRA’s 1996 “Savanna Army Depot Reuse Plan and Implementation Strategy” which resulted in discarding the construction of a port terminal and barge fleeting due to environmental concerns and challenges identified by state and federal regulators.

Page 68, Section 8.2 Alternative 1: Brick House Slough: This alternative identifies the following structures to be built within USFWS lands and river bottom jurisdiction: dry bulk/liquid bulk wharf (800 lineal feet); liquid bulk pipeline; floating dry dock; wharf access road; conveyor system that extends to wharf and dock; barge fleet along the east and west shorelines of Apple River Island, and; extensive dredging (approximately 400,000 cubic yards) within Brickhouse Slough extending three miles south along a backwater channel to connect to the Mississippi River.

USFWS comment: LRA has not consulted with USFWS on construction of these structures. The Refuge was established by an act of Congress in 1924 for the purpose of providing a refuge and breeding place for migratory birds, fish, other wildlife and plants. The Refuge is part of the National Wildlife Refuge System and is protected and governed by many federal laws and regulations with conservation of fish, wildlife and habitat as its primary mission. National Wildlife Refuges are required to evaluate the appropriateness and compatibility of any proposed "uses". Port facilities and barge fleet are not considered to be appropriate and compatible uses of Refuge lands and waters. The LRA needs to identify how they intend to meet the appropriateness and compatibility requirements for their proposed plan that will encroach upon the Refuge. Federal law prohibits the construction and operation of this type of commercial facility on National Wildlife Refuges.

Page 71, Section 8.3 Alternative 2: Commander's Pond Lite: This alternative identifies the following structures to be constructed within USFWS lands and river bottom jurisdiction: dry bulk/liquid bulk wharf (800 lineal feet); liquid bulk pipeline; floating dry dock; wharf access road; conveyor system that extends to wharf and dock; barge fleet along the east and west shorelines of Apple River Island, and; extensive dredging (approximately 400,000 cubic yards) within Brickhouse Slough extending three miles south along a backwater channel to connect to the Mississippi River.

USFWS comment: See comment above for Alternative 1.

Page 73, Section 8.4 Alternative 3: Commander's Pond Full: LRA's preferred alternative identifies the following structures to be constructed within USFWS lands and river bottom jurisdiction: dry bulk/liquid bulk wharf (800 lineal feet); liquid bulk pipeline; floating dry dock; wharf access road; conveyor system that extends to wharf and dock; barge fleet along the east and west shorelines of Apple River Island, and; extensive dredging (approximately 400,000 cubic yards) within Brickhouse Slough extending three miles south along a backwater channel to connect to the Mississippi River.

USFWS comment: See comment above for Alternative 1.

Page 76, Section 9.1 Description of Preferred Alternative:

USFWS comment: See comment above for Alternative 1.

In addition, Aquatic Habitat Restoration is identified as a project feature, however, there are no details provided regarding what this element of the project will entail. Additional information is needed to aid in a full evaluation of the proposed project.

Page 79, Section 9.3 Dredging Estimate: Figure 9-2 is a map of proposed dredge areas for the project.

USFWS comment: The preferred alternative identifies the excavation of 1,237,450 cubic yards of material that includes 304,808 cubic yards of contaminated material. Details are not provided regarding the destination of the material (contaminated and non-contaminated), how it will be handled and transported, nor what is the plan to manage potential releases and/or fish and wildlife resource exposure during construction of the project. Additional information is needed to aid in a full evaluation of the proposed project. The dredging map does not identify river miles; however, it appears the dredge cut extends north to the closing dam in Brickhouse Slough

and south to the closing dam in the channel that provides access to the river. The LRA needs to provide a navigation map that shows river miles that will aid in an evaluation of potential environmental impacts from dredging that may occur along the access route to the Mississippi River. The Final Reuse Plan for Parcel 20 needs to identify potential impacts of dredging to closing dams present within or adjacent to the project area. The expenditures tables need to identify the cost of annual dredging needed to keep the project area and access route deep enough to accommodate tow boats and barges.

Page 87, Assumptions: Construction will take place from 2024 – 2028.

USFWS comment: Consultation with USFWS should begin immediately if construction is proposed in 2024 since this proposal is in violation of the National Wildlife Refuge System Improvement Act of 1997.

Page 93, Next Steps: “Key next steps to advance the process include...Coordination with regulatory partners – state and federal...”

USFWS comment: Many years of planning have gone into the LRA’s Final Reuse Plan for Parcel 20 without coordination with regulatory partners despite many attempts by USFWS to engage the LRA in conversations to discuss our concerns. The concerns previously identified by state and federal regulators during the LRA’s 1996 “Savanna Army Depot Reuse Plan and Implementation Strategy” environmental feasibility study for a port terminal and barge fleeting project were not considered during the current planning effort.

In summary, there will be environmental impacts to natural resources that extend beyond the Parcel 20 boundary regardless of which alternative the LRA chooses. All three Final Reuse Plan alternatives include structures, barge fleeting and dredging that encroach upon land and river bottom jurisdiction within the Upper Mississippi River National Wildlife and Fish Refuge. The LRA will need to address the concerns identified above, provide the necessary compliance documents and justifications that will allow USFWS staff to complete a Finding of Appropriateness required by the National Wildlife Refuge System Improvement Act of 1997, and complete coordination with USFWS required by the Fish and Wildlife Coordination Act. It is likely that federal law will prevent the use of USFWS lands for LRA’s proposed Final Reuse Plan for Parcel 20 and that should be acknowledged/addressed in the plan.

Thank you for the opportunity to comment on LRA’s Final Reuse Plan for Parcel 20. Please let me know if you have questions or need additional information. You can contact me at the above address, telephone 815-273-2732 or email: ed_britton@fws.gov

Sincerely,

EDWARD
BRITTON

Digitally signed by EDWARD
BRITTON
Date: 2024.01.03 07:46:50 -06'00'

Ed Britton
Savanna District Manager
Upper Mississippi River National Wildlife & Fish Refuge
U.S. Fish & Wildlife Service

Subject: FW: USFWS Comments for Army's Environmental Assessment of LRA's Final Reuse Plan for Parcel 20
Attachments: EA comments to Army for LRA Parcel 20 barge terminal RM 545.4 jan 2024 signed.pdf; 2023 12-19 LRA Parcel 20 Barge Terminal and Fleeting Comments USFWS Ecological Services.pdf; Ltr to Linda Balcom may 22 2017.pdf

From: Britton, Ed <ed_britton@fws.gov>

Sent: Wednesday, January 3, 2024 8:46 AM

To: Knuth, William T CIV USARMY HQDA DCS G-9 (USA) <william.t.knuth.civ@army.mil>

Cc: Tom Lineer <thomas.a.lineer.civ@mail.mil>

Subject: [Non-DoD Source] USFWS Comments for Army's Environmental Assessment of LRA's Final Reuse Plan for Parcel 20

Good morning Todd: Attached are U.S. Fish and Wildlife Service (USFWS) comments for Army's Environmental Assessment of Jo-Carroll Depot Local Redevelopment Authority's Final Reuse Plan for Parcel 20.

The first attachment is my letter providing USFWS comments on the Final Reuse Plan for Parcel 20 and the Upper Mississippi River National Wildlife and Fish Refuge that lies adjacent to the parcel.

The second attachment is USFWS comments related to Threatened and Endangered Species and other concerns provided by Kraig McPeck, Field Office Supervisor, Illinois-Iowa Ecological Services Field Office.

The third attachment is my letter to Ms. Linda Balcom dated May 22, 2017 that is referenced in the current USFWS Refuge comments for the Final Reuse Plan for Parcel 20.

Thank you for the opportunity to provide comments on Army's Environmental Assessment for the LRA's Final Reuse Plan for Parcel 20.

Please let me know if you need additional information.

Ed Britton, Savanna District Manager
Upper Mississippi River National Wildlife and Fish Refuge
7071 Riverview Road, Thomson IL 61285
office tele 815-273-2732 x111, cell 815-541-4598
ed_britton@fws.gov

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United States Department of the Interior

FISH AND WILDLIFE SERVICE
Upper Mississippi River National Wildlife and Fish Refuge
7071 Riverview Road
Thomson, Illinois 61285
January 3, 2024



Mr. Thomas Lineer
BRAC Program Manager
Attn: Todd Knuth
Base Environmental Coordinator
Savanna Army Depot Activity
18935 B Street
Savanna, Illinois 61285

Dear Mr. Lineer:

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010b

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010k

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010p

Page 65, Section 7.2.6 Public and TAC input: “Concerns” section identifies “Dredging and environmental issues in Brickhouse Slough...Wing dams in the vicinity of Apple Island...Impacts to wetlands...Development in floodplain....”

010q

USFWS comment: The “Concerns” section does not identify that a large part of the Final Reuse Plan for Parcel 20 extends onto lands and river bottom jurisdiction of two federal agencies, Department of Interior and Department of Army, and lands owned and managed as National Wildlife Refuge. There has been no effort by LRA to address the “Concerns” issues despite several years of planning.

Page 67, Section 8 Redevelopment Alternatives: The plan identifies there are “environmental and ecological considerations and constraints” due to the project lies within the Upper Mississippi River National Wildlife and Fish Refuge.

USFWS comment: Several years of planning have gone into completion of the LRA’s Final Reuse Plan for Parcel 20. LRA is aware the project will extend onto the Refuge and will impact federal lands and river bottom jurisdiction. The National Wildlife Refuge System Improvement Act of 1997 prohibits commercial use of National Wildlife Refuges. However, no effort has been made to consult with USFWS to discuss federal laws that prohibit these activities. Planning has also proceeded without addressing significant concerns identified during the LRA’s 1996 “Savanna Army Depot Reuse Plan and Implementation Strategy” which resulted in discarding the construction of a port terminal and barge fleeting due to environmental concerns and challenges identified by state and federal regulators.

010r

Page 68, Section 8.2 Alternative 1: Brick House Slough: This alternative identifies the following structures to be built within USFWS lands and river bottom jurisdiction: dry bulk/liquid bulk wharf (800 lineal feet); liquid bulk pipeline; floating dry dock; wharf access road; conveyor system that extends to wharf and dock; barge fleeting along the east and west shorelines of Apple River Island, and; extensive dredging (approximately 400,000 cubic yards) within Brickhouse Slough extending three miles south along a backwater channel to connect to the Mississippi River.

USFWS comment: LRA has not consulted with USFWS on construction of these structures. The Refuge was established by an act of Congress in 1924 for the purpose of providing a refuge and breeding place for migratory birds, fish, other wildlife and plants. The Refuge is part of the National Wildlife Refuge System and is protected and governed by many federal laws and regulations with conservation of fish, wildlife and habitat as its primary mission. National Wildlife Refuges are required to evaluate the appropriateness and compatibility of any proposed “uses”. Port facilities and barge fleeting are not considered to be appropriate and compatible uses of Refuge lands and waters. The LRA needs to identify how they intend to meet the appropriateness and compatibility requirements for their proposed plan that will encroach upon the Refuge. Federal law prohibits the construction and operation of this type of commercial facility on National Wildlife Refuges.

010s

Page 71, Section 8.3 Alternative 2: Commander’s Pond Lite: This alternative identifies the following structures to be constructed within USFWS lands and river bottom jurisdiction: dry bulk/liquid bulk wharf (800 lineal feet); liquid bulk pipeline; floating dry dock; wharf access road; conveyor system that extends to wharf and dock; barge fleeting along the east and west shorelines of Apple River Island, and; extensive dredging (approximately 400,000 cubic yards) within Brickhouse Slough extending three miles south along a backwater channel to connect to the Mississippi River.

010t

USFWS comment: See comment above for Alternative 1.

Page 73, Section 8.4 Alternative 3: Commander’s Pond Full: LRA’s preferred alternative identifies the following structures to be constructed within USFWS lands and river bottom jurisdiction: dry bulk/liquid bulk wharf (800 lineal feet); liquid bulk pipeline; floating dry dock; wharf access road; conveyor system that extends to wharf and dock; barge fleeting along the east and west shorelines of Apple River Island, and; extensive dredging (approximately 400,000 cubic yards) within Brickhouse Slough extending three miles south along a backwater channel to connect to the Mississippi River.

010u

USFWS comment: See comment above for Alternative 1.

Page 76, Section 9.1 Description of Preferred Alternative:

USFWS comment: See comment above for Alternative 1.

In addition, Aquatic Habitat Restoration is identified as a project feature, however, there are no details provided regarding what this element of the project will entail. Additional information is needed to aid in a full evaluation of the proposed project.

010v

Page 79, Section 9.3 Dredging Estimate: Figure 9-2 is a map of proposed dredge areas for the project.

USFWS comment: The preferred alternative identifies the excavation of 1,237,450 cubic yards of material that includes 304,808 cubic yards of contaminated material. Details are not provided regarding the destination of the material (contaminated and non-contaminated), how it will be handled and transported, nor what is the plan to manage potential releases and/or fish and wildlife resource exposure during construction of the project. Additional information is needed to aid in a full evaluation of the proposed project. The dredging map does not identify river miles; however, it appears the dredge cut extends north to the closing dam in Brickhouse Slough

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and south to the closing dam in the channel that provides access to the river. The LRA needs to provide a navigation map that shows river miles that will aid in an evaluation of potential environmental impacts from dredging that may occur along the access route to the Mississippi River. The Final Reuse Plan for Parcel 20 needs to identify potential impacts of dredging to closing dams present within or adjacent to the project area. The expenditures tables need to identify the cost of annual dredging needed to keep the project area and access route deep enough to accommodate tow boats and barges.

010w

Page 87, Assumptions: Construction will take place from 2024 – 2028.

010x

USFWS comment: Consultation with USFWS should begin immediately if construction is proposed in 2024 since this proposal is in violation of the National Wildlife Refuge System Improvement Act of 1997.

Page 93, Next Steps: “Key next steps to advance the process include...Coordination with regulatory partners – state and federal....”

USFWS comment: Many years of planning have gone into the LRA’s Final Reuse Plan for Parcel 20 without coordination with regulatory partners despite many attempts by USFWS to engage the LRA in conversations to discuss our concerns. The concerns previously identified by state and federal regulators during the LRA’s 1996 “Savanna Army Depot Reuse Plan and Implementation Strategy” environmental feasibility study for a port terminal and barge fleeting project were not considered during the current planning effort.

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In summary, there will be environmental impacts to natural resources that extend beyond the Parcel 20 boundary regardless of which alternative the LRA chooses. All three Final Reuse Plan alternatives include structures, barge fleeting and dredging that encroach upon land and river bottom jurisdiction within the Upper Mississippi River National Wildlife and Fish Refuge. The LRA will need to address the concerns identified above, provide the necessary compliance documents and justifications that will allow USFWS staff to complete a Finding of Appropriateness required by the National Wildlife Refuge System Improvement Act of 1997, and complete coordination with USFWS required by the Fish and Wildlife Coordination Act. It is likely that federal law will prevent the use of USFWS lands for LRA’s proposed Final Reuse Plan for Parcel 20 and that should be acknowledged/addressed in the plan.

010z

Thank you for the opportunity to comment on LRA’s Final Reuse Plan for Parcel 20. Please let me know if you have questions or need additional information. You can contact me at the above address, telephone 815-273-2732 or email: ed_britton@fws.gov

Sincerely,

Ed Britton
Savanna District Manager
Upper Mississippi River National Wildlife & Fish Refuge
U.S. Fish & Wildlife Service



United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE

Illinois - Iowa Field Office

1511 47th Avenue

Moline, Illinois 61265

Phone: (309) 757-5800 Fax: (309) 757-5807



Thomas Lineer
BRAC Program Manager
Attn: Todd Knuth, Base Environmental Coordinator
Savanna Army Depot Activity
18935 B Street
Savanna, Illinois 61285
William.t.knuth.civ@army.mil

December 19, 2023
Electronic Mail

Dear Thomas Lineer,

Thank you for the opportunity to provide comments regarding the preparation of an Environmental Assessment (EA) to evaluate potential effects of the Army's transfer of and Jo-Carroll Depot Local Redevelopment Authority's (LRA) proposed Reuse Plan for Parcel 20 of the Savanna Army Depot Activity site. According to the Reuse Plan, Parcel 20 encompasses 132.2 acres at the southern end of the Depot in Carroll County, Illinois. It is bordered by the Army Depot Road, Apple River, the Sewer Treatment Plant, and additional parcels. Parcel 20 is comprised of a pond, landfill, and low-lying forested wetland areas associated with the Apple River. The purpose of the Reuse Plan is to assess the redevelopment potential of this parcel.

The proposed LRA Preferred Alternative outlined in the Reuse Plan includes construction of multiple barge fleeting areas and wharfs, dry docks, piers, dry storage areas, liquid storage tanks, grain silos, a fertilizer warehouse, rail spurs, aquatic restoration, trails, and a solar array along with associated access roads, conveyors, and pipelines. Our office has reviewed the Reuse Plan and supporting documents and offers the following comments.

General Comments

All alternatives outlined in the Reuse Plan contain proposed features that would be constructed outside the footprint of Parcel 20. We recommend all areas containing proposed features be thoroughly coordinated with the relevant land owners/ managers and included when evaluating general environmental impacts and effects to federally listed species and fish and wildlife resources.

Additionally, numerous navigation structures (i.e. wing dams, closing dams) are present within and adjacent to the proposed barge mooring and dredging area footprints, with proposed barge mooring locations along Apple River Island having the potential to interfere with commercial navigation traffic. Coordination should be initiated with the U.S. Army Corps of Engineers to determine the potential for commercial navigation impacts as a result of the project.

Threatened and Endangered Species

Section 7 of the Endangered Species Act of 1973 requires that actions authorized, funded, or carried out by Federal agencies not jeopardize federally threatened or endangered species or adversely modify designated critical habitat. To fulfill this mandate, Federal agencies (or their designated non-federal representative) must consult with the Service if they determine their project “may affect” listed species or critical habitat. In order for you to evaluate the potential effects of projects on your site on federally listed species, you can download a list of species from the Service’s Information for Planning and Consultation (IPaC) website at <https://ipac.ecosphere.fws.gov/>. Please note that official species lists are valid for 90 days and should be updated accordingly prior to consultation initiation.

Habitat descriptions for listed species can also be found on the IPaC website. You may use these descriptions to help you determine if there is suitable habitat within your project area. If no suitable habitat exists within your project area or its area of impact, and no species or critical habitat is present, it is appropriate to determine the project will have “no effect” on listed species. If you determine the action will have “no effect” on listed species or critical habitat, concurrence with that determination from the Service is not required. The Illinois-Iowa Ecological Services Field Office has no regulatory or statutory authority for concurring with “no effect” determinations. However, we recommend you maintain a written record of your “no effect” determination and include it in your decision record. An example “no effect” memo can be found on our website at <https://www.fws.gov/media/no-effect-habitat-letter>.

If suitable habitat is found in the area of your project, the appropriate determination is that the project “may affect” listed species. In some instances, surveys may be recommended to help make this determination. When designating your project location for Section 7 purposes, the Service recommends that you consider not only the physical location of all project features, but also any surrounding area on the landscape where potential effects to species may occur due to project activities. Additional information on how to make accurate effect determinations and how to document your determination can be found on our website at <https://www.fws.gov/media/information-requirements-section-7-consultation>.

The Reuse Plan does not currently include a discussion of the “with project” effects on ecological resources and protected species associated with the preferred alternative. When assessing potential effects on listed species through preparation of the EA and associated section 7 determinations under the Endangered Species Act, all project actions that have the potential to affect federally listed species or their habitat should be considered, including but not limited to:

- Consider how barges will be secured within the fleeting area (installation of mooring structures, grounding, tying off onto trees, motor power) and whether any of these actions result in potential impacts to federally listed species or their habitat.
- Consider all areas that may require dredging, including ingress/ egress pathways for barges and any future maintenance dredging needs.
- Consider all areas of tree clearing that may be necessary for the construction of project infrastructure.

- Consider effects of additional barge traffic within the side channel and Apple River Island peripheries (wave-generated erosion, prop-wash, etc.).
- Consider the potential for spills or other releases within aquatic and terrestrial areas associated with “minor repair” activities and the transfer of commodities.
- Consider areas of historic landfills and other sources of contamination and how exposure routes will be managed through construction and operation of the project.

Freshwater Mussels

Two federally endangered freshwater mussel species are known to occur in Pool 13 of the Upper Mississippi River, including Higgins eye pearlymussel (*Lampsilis higginsii*) and sheepsnose mussel (*Plethobasus cyphus*). Additional information, including ideal habitat conditions for these species can be found at the following links:

Higgins eye pearlymussel: <https://www.fws.gov/species/higgins-eye-lampsilis-higginsii>

Sheepsnose: <https://www.fws.gov/species/sheepsnose-plethobasus-cyphus>

As noted in the Reuse Plan, EcoAnalysts conducted a mussel survey at two potential terminal construction sites within the slough adjacent to Parcel 20 in 2018. The survey identified a mussel bed extending between the two survey sites and collected the federally endangered Higgins eye pearlymussel. As a result, we recommend consideration be given to completing a freshwater mussel survey further evaluating the extent of anticipated aquatic impacts. Additionally, please note, we generally consider mussel surveys valid for a period of five years.

Bats

Two federally endangered bat species are known to have ranges overlapping the project area. We recommend consideration be given to avoiding and minimizing potential impacts to these species, including minimizing tree clearing to the extent practicable and limiting tree removal activities to timeframes outside of the maternity roosting season (October 1 through March 31).

Additionally, the Service has proposed an endangered listing status for the tricolored bat (*Perimyotis subflavus*). If the proposed project extends beyond the final listing decision for the tricolored bat, reinitiation of consultation may be necessary. Finally, the little brown bat (*Myotis lucifugus*), is currently under review and a listing decision may occur prior to the initiation of project construction. Please also re-initiate consultation, as appropriate, following release of this final listing determination if it occurs.

Additional Information

Finally, the Reuse Plan states that, “Construction will take place from 2024 through 2028” (page 87). Please note, should it be determined that federally listed species may be adversely affected as a result of the project, formal consultation would likely be warranted. This process may take up to 135 days from the initiation of formal consultation. Additionally, the Service published

final policies on Mitigation Impacts of Development to Further Conservation (May 12, 2023) that will be considered, should formal consultation be warranted. <https://www.fws.gov/press-release/2023-05/final-policies-mitigating-impacts-development-further-conservation>.

Fish and Wildlife Resources

Under Section 2(a) and 2(b) of the Fish and Wildlife Coordination Act, “...*whenever the waters of any stream or waterbody are proposed or authorized to be...modified for any purpose whatever ...by any department or agency of the United States, or by any public or private agency under Federal permit or license, such department or agency first shall consult with the United States Fish and Wildlife Service and with the head of the agency exercising administration over the wildlife resources of the particular State...*” As such, this requires timely notification to the Service and state conservation agency concerning the proposed project to ensure “...*that wildlife conservation shall receive equal consideration and be coordinated with other features of water-resource development programs through effectual and harmonious planning...*” It is our understanding that this is the first occurrence of direct coordination with the Service since project initiation. Due to the project’s positioning within and adjacent to areas owned and managed as part of the Upper Mississippi River National Wildlife and Fish Refuge, documented protected species within the project area, and the presence of contaminants throughout the site, we recommend timely and continued coordination with the Service moving forward.

The Reuse Plan references historic landfills and other sources of contamination throughout the proposed project; however, a plan to manage potential releases and/ or fish and wildlife resource exposure during construction and operation of the project is not included. Additionally, Section 9.3 of the plan references up to 1,237,450 cubic yards of material, consisting of both contaminated and non-contaminated material, that may be dredged as part of the project; however, details are not provided regarding the final destination of the material or how it will be handled and transported. Finally, several sections of the document reference an “Aquatic Restoration Area.” However, there are no details provided regarding what this element of the project will entail. We recommend additional information regarding these elements be discussed and included within the EA to aid in a full evaluation of the proposed project.

Finally, we recommend that the Corps be contacted should any potential wetland or stream impacts be expected as part of the project.

Migratory Birds

The Service removed bald eagles from protection under the Endangered Species Act on August 8, 2007. However, they remain protected today under the Migratory Birds Treaty Act and the Bald and Golden Eagle Protection Act (Eagle Act). The Eagle Act prohibits take which is defined as, “pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, destroy, molest, or disturb” (50 CFR 22.3). Disturb is defined in regulations as, “to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, or 2) decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior.” Please contact the Region 3 Migratory Bird

Office at <https://www.fws.gov/program/migratory-bird-permit/contact-us> should activities that have the potential to result in take or disturbance of eagles or their nests be necessary.

Conclusion

These comments provide technical assistance only and do not constitute the report of the Secretary of the Interior on the project within the meaning of Section 2(b) of the Fish and Wildlife Coordination Act, do not fulfill the requirements under Section 7 of the Endangered Species Act, nor do they represent the review comments of the U.S. Department of the Interior on any forthcoming environmental statement. If you have questions regarding these comments, please feel free to contact Illinois-Iowa Ecological Services Field Office staff Lauren Larson at lauren_larson@fws.gov or Sara Schmuecker at sara_schmuecker@fws.gov.

Sincerely,

Kraig McPeck
Field Office Supervisor
Illinois-Iowa Field Office

cc:

(USFWS) Ed Britton, Sabrina Chandler

(USACE) Joe Lundh, David Reynolds, Jodi Creswell, Matthew Zehr



United States Department of the Interior

FISH AND WILDLIFE SERVICE
Upper Mississippi River National Wildlife and Fish Refuge
7071 Riverview Road
Thomson, Illinois 61285
May 22, 2017



Linda Balcom, P.G.
National Director, BRAC Programs
Weston Solutions, Inc.
Suite 100, 1435 Garrison Street
Lakewood, Colorado 80215

Subject: Proposed Barge Terminal at Mississippi River Mile 545.4

Dear Ms Balcom:

Per your request, I am providing this letter to summarize our discussion held on May 3, 2017 regarding a Barge Feasibility Study that is being conducted at the shuttered Savanna Army Depot (Depot) at Mississippi River mile 545.4

The Department of Defense, Office of Economic Adjustment has provided funding to the Jo-Carroll Depot Local Redevelopment Authority (LRA) to conduct the Barge Feasibility Study. Weston Solutions, Inc. is the LRA's contractor that is conducting the study.

It is important to identify the history of boundary changes and a previous study that investigated the feasibility of a barge terminal at the Depot. The Depot was closed under the 1995 Base Realignment and Closure Act and totals 13,062 acres. The LRA and the U.S. Fish & Wildlife Service (Service) came to agreement on their respective boundaries and a letter of agreement was signed in April 1996. The Service's boundary included 9,226 acres and was named the Lost Mound Unit of the Upper Mississippi River National Wildlife and Fish Refuge (Refuge) and included all of the Mississippi River shoreline.

Subsequently, the LRA identified that shoreline development including a barge terminal was critical to their redevelopment plan and requested a land exchange for shoreline area within the Refuge. As a partner in the redevelopment effort, the Refuge signed an agreement with the LRA in July 1996 transferring the southern 3.5 miles of Mississippi River shoreline to the LRA for potential development. As part of the land exchange agreement, the Refuge required the LRA to complete a shoreline feasibility study to investigate the potential for development of a barge terminal.

In November 1996, the LRA publicly announced that a shoreline feasibility study would be conducted for a barge terminal, and requested public input. In December 1996, the LRA's "Savanna Army Depot Reuse Plan and Implementation Strategy" was released to the public and identified potential shoreline development to include a "Port Terminal" at Mississippi River mile 548.4. This site is approximately three miles north of the current proposed barge terminal site. The Reuse Plan specifically (page 178) identified "...An ecological port feasibility study has been proposed to identify the optimal siting for it. The US Fish and Wildlife Service will assist the LRA to define a scope of work for the port study...."

In March 1997, the first meeting of a shoreline development committee was held at the LRA's office. The LRA's Executive Director appointed the Environmental Committee's Chairperson to direct the committee, which would identify a scope of work for the Port Terminal feasibility study and assist with the investigation. The shoreline development committee included staff from state and federal agencies including the Army Corps of Engineers - Navigation Division, Illinois Department of Natural Resources, Savanna Army Depot, U.S. Fish & Wildlife Service, and a commercial navigation advisor, Mr. Warren Jackman from Galena.

The shoreline development committee, including the LRA's consultants Black & Veatch and MSA Professional Services, met regularly during the summer and fall of 1997. The committee identified several concerns for developing a Port Terminal at the proposed site that included: 55 wing dams were present along the 16 mile stretch of river extending above (to Lock & Dam 12) and below the proposed port site; 15 wing dams were present in the adjacent 5 mile stretch of river where the Port Terminal was proposed and were located on both sides (Illinois & Iowa) of the main channel; the wing dams restricted barge navigability and would not allow concentrated barge traffic, especially considering that Lock & Dam 12 was located nearby, and; the Mississippi River main channel was relatively narrow and there were no shoreline fleeting or mooring areas available for barges along this section of river. I have attached an upper Pool 13 map showing the river mile locations of the wing dams.

On October 30, 1997, the LRA announced that a barge terminal was not economically feasible due to the many constraints identified by the shoreline development committee. Neither a draft report nor a final report was distributed to committee members detailing the shoreline development committee's investigation and recommendation because the LRA would no longer continue with the shoreline study and wanted to avoid paying additional costs to prepare a report.

The LRA consequently eliminated all plans for shoreline development and focused redevelopment efforts within the uplands. In June 1999, the LRA and the Refuge signed a second agreement for land swap that returned the river shoreline area to the Refuge.

In September 2003, a Memorandum of Agreement was approved between the Department of Defense and Department of Interior that officially established the Lost Mound Unit within the National Wildlife Refuge System. This official act prohibited any future informal agreements for land exchange between the LRA and the Refuge because the unit was now protected under national guidelines. The Lost Mound Unit currently includes 9,714 acres within the Depot.

The Refuge was established by an act of Congress in 1924 for the purpose of providing a refuge and breeding place for migratory birds, fish, other wildlife and plants. It encompasses 240,000 acres and extends 261 miles along the Mississippi River within the states of Illinois, Iowa, Wisconsin and Minnesota. The Refuge is managed by the U.S. Fish and Wildlife Service, Department of Interior and is part of the National Wildlife Refuge System which includes 561 refuges nationwide totaling over 100 million acres. The Refuge System is the world's largest collection of lands set aside for the conservation of fish and wildlife.

The current Barge Feasibility Study is focused on Parcel 5 of the Depot. This parcel was formerly located within the Refuge boundary. However, the environmental clean-up scope of work at Site 20 identified the removal of contaminated hot spots only, and leaving carcinogenic compounds buried in the ground that would remain under a capped landfill. Site 20 lies within the Apple River floodplain and was a concern for liability by the Refuge, as the future landowner. Negotiations between the Refuge and Army to exclude Site 20 from Parcel 5 were unsuccessful, so Parcel 5 was given back to the Army in 2015.

Parcel 5 no longer lies within the Refuge boundary. However, most of the Mississippi River shoreline both within and adjacent to the Depot are within the Refuge boundary. Barge access from the main channel to Parcel 5 must navigate through a narrow shallow corridor that is within the Refuge boundary, as shown on the attached Pool 13 map. Any proposed improvements to allow barge access that would have direct impacts to the Refuge lands and waters would have to be approved by the Refuge.

As a unit within the National Wildlife Refuge System, the Refuge is protected and governed by many federal laws and regulations with conservation of fish, wildlife and habitat as its primary mission. National Wildlife Refuges are required to evaluate the appropriateness and compatibility of any proposed "uses". Barge fleeting and mooring are typically not considered to be appropriate and compatible uses of Refuge lands and waters.

Please let me know if you need additional information. You can contact me at the above address, or telephone 815-273-2732 x 111, or email: ed_britton@fws.gov

Sincerely,

A handwritten signature in black ink, appearing to read "Ed Britton".

Ed Britton, Refuge Manager
Savanna District, Upper Mississippi River National Wildlife & Fish Refuge
U.S. Fish & Wildlife Service



United States Department of the Interior

U.S. FISH AND WILDLIFE SERVICE

Illinois - Iowa Field Office

1511 47th Avenue

Moline, Illinois 61265

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Thomas Lineer
BRAC Program Manager
Attn: Todd Knuth, Base Environmental Coordinator
Savanna Army Depot Activity
18935 B Street
Savanna, Illinois 61285
William.t.knuth.civ@army.mil

December 19, 2023
Electronic Mail

Dear Thomas Lineer,

Thank you for the opportunity to provide comments regarding the preparation of an Environmental Assessment (EA) to evaluate potential effects of the Army's transfer of and Jo-Carroll Depot Local Redevelopment Authority's (LRA) proposed Reuse Plan for Parcel 20 of the Savanna Army Depot Activity site. According to the Reuse Plan, Parcel 20 encompasses 132.2 acres at the southern end of the Depot in Carroll County, Illinois. It is bordered by the Army Depot Road, Apple River, the Sewer Treatment Plant, and additional parcels. Parcel 20 is comprised of a pond, landfill, and low-lying forested wetland areas associated with the Apple River. The purpose of the Reuse Plan is to assess the redevelopment potential of this parcel.

011a

The proposed LRA Preferred Alternative outlined in the Reuse Plan includes construction of multiple barge fleeting areas and wharfs, dry docks, piers, dry storage areas, liquid storage tanks, grain silos, a fertilizer warehouse, rail spurs, aquatic restoration, trails, and a solar array along with associated access roads, conveyors, and pipelines. Our office has reviewed the Reuse Plan and supporting documents and offers the following comments.

General Comments

All alternatives outlined in the Reuse Plan contain proposed features that would be constructed outside the footprint of Parcel 20. We recommend all areas containing proposed features be thoroughly coordinated with the relevant land owners/ managers and included when evaluating general environmental impacts and effects to federally listed species and fish and wildlife resources.

011b

Additionally, numerous navigation structures (i.e. wing dams, closing dams) are present within and adjacent to the proposed barge mooring and dredging area footprints, with proposed barge mooring locations along Apple River Island having the potential to interfere with commercial navigation traffic. Coordination should be initiated with the U.S. Army Corps of Engineers to determine the potential for commercial navigation impacts as a result of the project.

011c

Threatened and Endangered Species

Section 7 of the Endangered Species Act of 1973 requires that actions authorized, funded, or carried out by Federal agencies not jeopardize federally threatened or endangered species or adversely modify designated critical habitat. To fulfill this mandate, Federal agencies (or their designated non-federal representative) must consult with the Service if they determine their project “may affect” listed species or critical habitat. In order for you to evaluate the potential effects of projects on your site on federally listed species, you can download a list of species from the Service’s Information for Planning and Consultation (IPaC) website at <https://ipac.ecosphere.fws.gov/>. Please note that official species lists are valid for 90 days and should be updated accordingly prior to consultation initiation.

011d

Habitat descriptions for listed species can also be found on the IPaC website. You may use these descriptions to help you determine if there is suitable habitat within your project area. If no suitable habitat exists within your project area or its area of impact, and no species or critical habitat is present, it is appropriate to determine the project will have “no effect” on listed species. If you determine the action will have “no effect” on listed species or critical habitat, concurrence with that determination from the Service is not required. The Illinois-Iowa Ecological Services Field Office has no regulatory or statutory authority for concurring with “no effect” determinations. However, we recommend you maintain a written record of your “no effect” determination and include it in your decision record. An example “no effect” memo can be found on our website at <https://www.fws.gov/media/no-effect-habitat-letter>.

011e

If suitable habitat is found in the area of your project, the appropriate determination is that the project “may affect” listed species. In some instances, surveys may be recommended to help make this determination. When designating your project location for Section 7 purposes, the Service recommends that you consider not only the physical location of all project features, but also any surrounding area on the landscape where potential effects to species may occur due to project activities. Additional information on how to make accurate effect determinations and how to document your determination can be found on our website at <https://www.fws.gov/media/information-requirements-section-7-consultation>.

011f

The Reuse Plan does not currently include a discussion of the “with project” effects on ecological resources and protected species associated with the preferred alternative. When assessing potential effects on listed species through preparation of the EA and associated section 7 determinations under the Endangered Species Act, all project actions that have the potential to affect federally listed species or their habitat should be considered, including but not limited to:

- Consider how barges will be secured within the fleeting area (installation of mooring structures, grounding, tying off onto trees, motor power) and whether any of these actions result in potential impacts to federally listed species or their habitat.
- Consider all areas that may require dredging, including ingress/ egress pathways for barges and any future maintenance dredging needs.
- Consider all areas of tree clearing that may be necessary for the construction of project infrastructure.

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- Consider effects of additional barge traffic within the side channel and Apple River Island peripheries (wave-generated erosion, prop-wash, etc.).
- Consider the potential for spills or other releases within aquatic and terrestrial areas associated with “minor repair” activities and the transfer of commodities.
- Consider areas of historic landfills and other sources of contamination and how exposure routes will be managed through construction and operation of the project.

011g

Freshwater Mussels

Two federally endangered freshwater mussel species are known to occur in Pool 13 of the Upper Mississippi River, including Higgins eye pearlymussel (*Lampsilis higginsii*) and sheepsnose mussel (*Plethobasus cyphus*). Additional information, including ideal habitat conditions for these species can be found at the following links:

Higgins eye pearlymussel: <https://www.fws.gov/species/higgins-eye-lampsilis-higginsii>

011h

Sheepsnose: <https://www.fws.gov/species/sheepsnose-plethobasus-cyphus>

As noted in the Reuse Plan, EcoAnalysts conducted a mussel survey at two potential terminal construction sites within the slough adjacent to Parcel 20 in 2018. The survey identified a mussel bed extending between the two survey sites and collected the federally endangered Higgins eye pearlymussel. As a result, we recommend consideration be given to completing a freshwater mussel survey further evaluating the extent of anticipated aquatic impacts. Additionally, please note, we generally consider mussel surveys valid for a period of five years.

Bats

Two federally endangered bat species are known to have ranges overlapping the project area. We recommend consideration be given to avoiding and minimizing potential impacts to these species, including minimizing tree clearing to the extent practicable and limiting tree removal activities to timeframes outside of the maternity roosting season (October 1 through March 31).

011i

Additionally, the Service has proposed an endangered listing status for the tricolored bat (*Perimyotis subflavus*). If the proposed project extends beyond the final listing decision for the tricolored bat, reinitiation of consultation may be necessary. Finally, the little brown bat (*Myotis lucifugus*), is currently under review and a listing decision may occur prior to the initiation of project construction. Please also re-initiate consultation, as appropriate, following release of this final listing determination if it occurs.

011j

Additional Information

Finally, the Reuse Plan states that, “Construction will take place from 2024 through 2028” (page 87). Please note, should it be determined that federally listed species may be adversely affected as a result of the project, formal consultation would likely be warranted. This process may take up to 135 days from the initiation of formal consultation. Additionally, the Service published

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final policies on Mitigation Impacts of Development to Further Conservation (May 12, 2023) that will be considered, should formal consultation be warranted. <https://www.fws.gov/press-release/2023-05/final-policies-mitigating-impacts-development-further-conservation>.

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Fish and Wildlife Resources

Under Section 2(a) and 2(b) of the Fish and Wildlife Coordination Act, “...*whenever the waters of any stream or waterbody are proposed or authorized to be...modified for any purpose whatever ...by any department or agency of the United States, or by any public or private agency under Federal permit or license, such department or agency first shall consult with the United States Fish and Wildlife Service and with the head of the agency exercising administration over the wildlife resources of the particular State...*” As such, this requires timely notification to the Service and state conservation agency concerning the proposed project to ensure “...*that wildlife conservation shall receive equal consideration and be coordinated with other features of water-resource development programs through effectual and harmonious planning...*” It is our understanding that this is the first occurrence of direct coordination with the Service since project initiation. Due to the project’s positioning within and adjacent to areas owned and managed as part of the Upper Mississippi River National Wildlife and Fish Refuge, documented protected species within the project area, and the presence of contaminants throughout the site, we recommend timely and continued coordination with the Service moving forward.

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The Reuse Plan references historic landfills and other sources of contamination throughout the proposed project; however, a plan to manage potential releases and/ or fish and wildlife resource exposure during construction and operation of the project is not included. Additionally, Section 9.3 of the plan references up to 1,237,450 cubic yards of material, consisting of both contaminated and non-contaminated material, that may be dredged as part of the project; however, details are not provided regarding the final destination of the material or how it will be handled and transported. Finally, several sections of the document reference an “Aquatic Restoration Area.” However, there are no details provided regarding what this element of the project will entail. We recommend additional information regarding these elements be discussed and included within the EA to aid in a full evaluation of the proposed project.

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Finally, we recommend that the Corps be contacted should any potential wetland or stream impacts be expected as part of the project.

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Migratory Birds

The Service removed bald eagles from protection under the Endangered Species Act on August 8, 2007. However, they remain protected today under the Migratory Birds Treaty Act and the Bald and Golden Eagle Protection Act (Eagle Act). The Eagle Act prohibits take which is defined as, “pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, destroy, molest, or disturb” (50 CFR 22.3). Disturb is defined in regulations as, “to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, or 2) decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior.” Please contact the Region 3 Migratory Bird

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Office at <https://www.fws.gov/program/migratory-bird-permit/contact-us> should activities that have the potential to result in take or disturbance of eagles or their nests be necessary.

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Conclusion

These comments provide technical assistance only and do not constitute the report of the Secretary of the Interior on the project within the meaning of Section 2(b) of the Fish and Wildlife Coordination Act, do not fulfill the requirements under Section 7 of the Endangered Species Act, nor do they represent the review comments of the U.S. Department of the Interior on any forthcoming environmental statement. If you have questions regarding these comments, please feel free to contact Illinois-Iowa Ecological Services Field Office staff Lauren Larson at lauren_larson@fws.gov or Sara Schmuecker at sara_schmuecker@fws.gov.

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Sincerely,

KRAIG MCPEEK Digitally signed by KRAIG MCPEEK
Date: 2023.12.19 12:00:56 -06'00'

Kraig McPeck
Field Office Supervisor
Illinois-Iowa Field Office

cc:

(USFWS) Ed Britton, Sabrina Chandler

(USACE) Joe Lundh, David Reynolds, Jodi Creswell, Matthew Zehr



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397

JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

September 6, 2024

Todd Knuth
Base Environmental Coordinator
Savanna Army Depot Activity
18935 B Street
Savanna, IL 61074

Refer to: 0158100002-Carroll County
Savanna Army Depot Activity
Superfund/Technical Reports

Dear Mr. Knuth,

The Illinois Environmental Protection Agency (Illinois EPA) provides the following response to the Department of the Army's August 8, 2024 letter regarding Early Coordination for a Supplemental Environmental Impact Statement for the Implementation of Base Realignment and Closure Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity. The letter seeks Illinois EPA's input on "resources of concern to [the] Agency or questions concerning this BRAC action." The letter seeks input regarding the Supplemental Environmental Impact Statement (SEIS) by asking for Illinois EPA input on holding an Agency meeting separate from the public scoping meeting and any additional comments to those provided in Illinois EPA correspondence of February 1, 2024.

Illinois EPA provides no additional comments at this time, beyond that provided on February 1, 2024, but reserves the right to provide additional comments based on any questions or issues that arise through scoping meetings, reports, or otherwise. For convenience, Illinois EPA provides a copy of its February 1, 2024 comments as an attachment to this letter.

Illinois EPA supports a scoping meeting to be held among all relevant Agencies separate from the public scoping meeting. Please keep Illinois EPA informed of any developments regarding the scoping meeting(s).

Thank you for the opportunity to provide input regarding the SEIS. If you have any questions or wish to discuss anything further, please contact me at 217-785-2891 or at Charlene.falco@illinois.gov.

Sincerely,

Charlene Falco
Project Manager
Federal Site Remediation Section
Bureau of Land

2125 S. First Street, Champaign, IL 61820 (217) 278-5800
1101 Eastport Plaza Dr., Suite 100, Collinsville, IL 62234 (618) 346-5120
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SVDA/SEIS Coordination, Parcel 20

September 6, 2024

Page 2 of 2

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/attachment

cc: Nicole Goers, USEPA, Region 5
 Beth Whetsell, Illinois Department of Natural Resources
 Ed Britton, US Fish and Wildlife Service
 Dick Kennard, US Army Corps of Engineers
 Tom Lineer, BRAC Program Manager
 Mara Roche, Jo Carroll Depot Local Redevelopment Authority
 Michelle Cannella, TetraTech



ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

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JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

February 1, 2024

Todd Knuth
Base Environmental Coordinator
Savanna Army Depot Activity
18935 B Street
Savanna, IL 61074

Refer to: 0158100002-Carroll County
Savanna Army Depot Activity
Superfund/Technical Reports

Dear Mr. Knuth,

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed the Department of the Army's December 14, 2023 letter regarding *Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois*. The letter seeks Illinois EPA's input on "resources of concern to [the] Agency or questions concerning this BRAC action." The letter seeks input presumably to inform the Environmental Assessment, which is in the process of being prepared.

Illinois EPA's comments below focus on the status of the existing sites regulated by the Comprehensive Environmental, Response, Compensation, and Liability Act (CERCLA) and general guidance on a potential solar installation. Please note that Illinois EPA has no experience with the property transfer mechanisms described (early transfer or interim use lease agreement). The LRA or Army should provide any specific questions they may have to the State for consideration.

Illinois EPA's comments do not provide a comprehensive regulatory and permitting review for the Local Reuse Authority's (LRA) Alternative 3. This letter does not address future conveyance or transfer of the site, or portions thereof, to any person or entity, nor should it be construed as providing an assurance that the site is fit for any particular purpose or use. Be advised that Illinois EPA has no authority to approve or disapprove property transfers or lease arrangements. The parties receiving the properties are responsible for determining their potential liability, reporting, and permitting requirements.

CERCLA Sites

Illinois EPA is not aware of any environmental permitted facilities within the boundaries of Parcel 20, though the sewage treatment plant (NPDES permit IL0027049) is adjacent, but not part of Parcel 20. Parcel 20 includes three National Priorities List (NPL) cleanup sites: Site 73, the Stables Dump, Site 178, Ordnance School Lake, and Site 20, the Old Landfill (or Apple River Landfill). (The parcel also includes two other sites, Sites 77 and 130 that were initially evaluated, and determined to not require further investigation or remediation.) Their current status based on Illinois EPA files is as follows:

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4302 N. Main Street, Rockford, IL 61103 (815) 987-7760

- Site 20, Old Landfill: This site is in a long-term monitoring phase to ensure the integrity of the landfill cover and to monitor groundwater. Because wastes are still present, the remediation objectives and scope of the remedy did not achieve unlimited use/unrestricted exposure (UU/UE); and therefore, land use controls are required to be maintained as long as the wastes are in place. The Land Use Control Implementation Plan (LUCIP) documenting the land use controls is final, though the environmental covenant is still draft. This site may also require additional investigation related to PFAS.
- Site 73, Stables Dump: Illinois EPA understands that cleanup was conducted to UU/UE levels, and thus no additional environmental cleanup action is warranted and no institutional controls are planned to be implemented for this property.
- Site 178, Ordnance School Lake: While a cleanup was conducted, the remedial goals focused on reducing risks to populations of workers and recreational users; and therefore, the remedy was not scoped to achieve UU/UE. Contamination is still present at levels that would pose risks to other types of receptors (e.g., (hypothetical) residential users). The presence and source of other chemicals such as DDD and DDT were not fully explored, though appropriate risk management decisions were made for the target receptor populations. In other words, while a cleanup was conducted, this does not mean that contamination is no longer present in lake soils and sediments. Because UU/UE was not achieved, land use controls are required for the property. Army has not yet submitted the LUCIP or draft environmental covenant for Site 178.
- Five-year reviews are required until the property is deemed protective of unlimited use/unrestricted exposure or until wastes are no longer present. Currently, the five year reviews conducted at SVDA include Sites 20, 73, and 178.

Illinois EPA's primary concern regarding re-use of any property with sites that have not achieved UU/UE is that the integrity of the remedy is preserved. The LRA-preferred alternative, Alternative 3, includes a recreational area on top of the Site 20 landfill cover, dredging of Site 178 with installation of a lift-on/lift-off wharf, and no apparent change in use for Site 73 (i.e., non-maintained open space/natural area). Illinois EPA provides the following considerations, which do not appear to be addressed in the LRA's reuse plan:

- Any recreational area provided at Site 20 must preserve the integrity of the landfill cover (which is two feet thick) and must not contribute to any erosion that may lead to exposure of wastes. Vegetation established on the cover is considered a protective layer for the soil cover. Any other surface layer established (e.g., parking lot, concrete slab, etc.) must be maintained in such a way as to protect the soil cover beneath it. No intrusions into the soil cover would be allowed, so installation of any features may necessitate bringing in additional soil to ensure protectiveness of the cover and that at least two feet of cover is maintained over the waste. Any groundwater monitoring wells must be protected, maintained, and remain accessible.
- Should Site 20 be discovered to be a source of PFAS contamination, Illinois EPA would expect an appropriate investigation to be scoped and conducted, with additional remediation and/or

additional long-term monitoring, as warranted. Whether or not use of the property would be further restricted is unknown.

- In regard to Site 178, Ordnance School Lake, the lower levels of contamination and/or unknown concentrations of other chemicals within lake sediments, surface water, and/or soils within the lake or on the lake banks/perimeter may have ramifications for disposal or management options of dredged soil and sediment. Additional characterization of the non-remediated portions of the lake should be conducted.
- In the reuse plan (Figure 9-2, page 97), it is not clear how the distinction between “contaminated” and “non contaminated” is being made for the volumes of dredged material from Ordnance School Lake. No discussion is included regarding characterization of dredged material or disposal/management of such material. No information has been provided regarding how the estimated acreages were determined (e.g., 16 acres for habitat restoration); no discussion is included regarding impacts to jurisdictional wetlands and need for mitigation.
- Alternatives 2 and 3 call for substantial dredging of Ordnance School Lake as well as shoreline areas between the Lake and Brickhouse Slough (Mississippi River) in order to create a new surface water connection to the Mississippi River. As such, Illinois EPA’s concerns would include any potential pollutant loading to the Mississippi River caused by resuspension of sediments during the construction activity and all measures that would be implemented to monitor and mitigate this concern. There appears to be no sediment data available for evaluating the potential ecological harm from dredging and sediment handling activities, including disposal. Illinois EPA is responsible for issuing Clean Water Act Section 401 water quality certifications, and such a certification would be required for any discharges of dredged or fill materials within Waters of the U.S. which includes dewatering flows from upland disposal activities. Such permitting will require extensive sediment chemical analyses and resuspension testing to adequately characterize the potential pollutant loading that would result from the project.
- Since the sites on Parcel 20 are regulated by CERCLA, the Army retains certain obligations regarding maintenance of remedies, protectiveness, and liability or potential liability related to any releases or mismanagement of wastes or contamination moved within the Parcel or removed from the Parcel. Illinois EPA will continue to look to the Army for maintenance of remedial components consistent with the Records of Decision, LUCIPs and environmental covenants.

Solar Development

The Army’s letter makes brief reference to a potential solar energy facility atop the capped landfill. Illinois EPA’s primary concern is that the design, construction, operation, and maintenance of any solar facility does not interfere with any of the remedial, operational, or maintenance components of the landfill, including the access road, new cover, groundwater monitoring wells, and protective vegetation. While Illinois EPA will expect to receive a copy of the design for review as it pertains to the remedy, Illinois EPA does not/will not approve, endorse, or provide technical support for any specific project.

Any planning regarding a solar facility at Site 20 should take into consideration:

- the installation, operation, and maintenance of the system features installed within the footprint of Parcel 20, including any foundations or anchorage associated with the system or its components.
- Needed demonstrations that the installation, operation and maintenance of the system will not compromise the environmental monitoring and control systems, such as the final cover (including protective vegetation) or groundwater monitoring wells.
- Needed demonstrations that the installation, operation and maintenance of the system will not compromise the landfill footprint or landfill area regarding run-off, pooling or ponding water, erosion, etc.
- Needed demonstrations of settlement and stability analyses showing that any solar facility components installed on the landfill cover will not adversely affect the final cover system. These analyses should also take into account the dead load of the system as well as consideration for wind and snow loading.

Appropriate information should be included in the LUCIP, revised as needed:

- A plan for inspection of the final cover system to address any issues that might arise during solar construction, operation and maintenance.
- A plan for maintaining the final cover vegetation or any other features protective of the cover.

Thank you for the opportunity to provide input prior to release of the Environmental Assessment.

If you have any questions or wish to discuss anything further, please contact me at 217-785-2891 or at

Charlene.falco@illinois.gov.

Sincerely,



Charlene Falco
Project Manager
Federal Site Remediation Section
Bureau of Land

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cc: Nicole Goers, USEPA, Region 5
Beth Whetsell, Illinois Department of Natural Resources
Ed Britton, US Fish and Wildlife Service
Dick Kennard, US Army Corps of Engineers
Tom Lineer, BRAC Program Manager
Mara Roche, Jo Carroll Depot Local Redevelopment Authority



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JB PRITZKER, GOVERNOR

JOHN J. KIM, DIRECTOR

013

February 1, 2024

Todd Knuth
Base Environmental Coordinator
Savanna Army Depot Activity
18935 B Street
Savanna, IL 61074

Refer to: 0158100002-Carroll County
Savanna Army Depot Activity
Superfund/Technical Reports

Dear Mr. Knuth,

The Illinois Environmental Protection Agency (Illinois EPA) has reviewed the Department of the Army's December 14, 2023 letter regarding *Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois*. The letter seeks Illinois EPA's input on "resources of concern to [the] Agency or questions concerning this BRAC action." The letter seeks input presumably to inform the Environmental Assessment, which is in the process of being prepared.

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Thank you for the opportunity to provide input prior to release of the Environmental Assessment. If you have any questions or wish to discuss anything further, please contact me at 217-785-2891 or at Charlene.falco@illinois.gov.

013e

Sincerely,



Charlene Falco
Project Manager
Federal Site Remediation Section
Bureau of Land

CAF:JS:CAH:p:\SDVA\Parcel 20\Review_EA consult_02 01 2024.docx

cc: Nicole Goers, USEPA, Region 5
Beth Whetsell, Illinois Department of Natural Resources
Ed Britton, US Fish and Wildlife Service
Dick Kennard, US Army Corps of Engineers
Tom Lineer, BRAC Program Manager
Mara Roche, Jo Carroll Depot Local Redevelopment Authority



Illinois
Department of
**Natural
Resources**

JB Pritzker, Governor • Natalie Phelps Finnie, Director
One Natural Resources Way • Springfield, Illinois 62702-1271
www.dnr.illinois.gov

January 30, 2024

Julie Kaplan
Water Resources Specialist
5202 Marigot Place
San Diego, CA 92124

**RE: Savanna Army Depot Disposal LRA Parcel 20
Consultation Program
EcoCAT Review #2408046
Carroll County**

Dear Mrs. Kaplan:

The Department has received your request for comments for the above referenced project and appreciates the opportunity to provide comments to ensure Illinois' natural resources are considered in the future Environmental Assessment. The Department works closely with the Illinois Environmental Protection Agency (IL EPA) in response to abandoned, uncontrolled hazardous waste sites per the Comprehensive Environmental Response, Compensation and Liability Act, and recognize for this proposed project, coordination with IL EPA and US EPA may be necessary and is separate from this review.

The proposed project, as described by the U.S. Fish and Wildlife Service is as follows:

An Environmental Assessment of Jo Carroll Depot Local Redevelopment Authority's (LRA) proposed Final Reuse Plan for Parcel 20 that identifies construction of a port terminal and barge fleeting. Parcel 20 contains 132 acres that is bordered by federal property. Construction of a port terminal and barge fleeting cannot be completed solely within Parcel 20 because there must be connection to the Mississippi River. The Refuge borders Parcel 20 on the north, south and west sides that includes all water access routes to the river. The LRA's Final Reuse Plan for Parcel 20 identifies the following project features to be constructed within USFWS fee title lands and river bottom jurisdiction: dry bulk/liquid bulk wharf (800 lineal feet); liquid bulk pipeline; floating dry dock; wharf access road; conveyor system that extends to wharf and dock; barge fleeting along the east and west shorelines of Apple River Island, and; extensive dredging (approximately 400,000 cubic yards) within Brickhouse Slough extending three miles south along a backwater channel to connect to the Mississippi River.

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

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Illinois Natural Areas Inventory (INAI)
Savanna Army Depot

State Threatened or Endangered Species

Butterfly (*Ellipsaria lineolata*)

Higgins Eye (*Lampsilis higginsii*)

James' Clammyweed (*Polanisia jamesii*)

Pallid Shiner (*Hybopsis amnis*)

Plains Hog-nosed Snake (*Heterodon nasicus*)

Sheepnose (*Plethobasus cyphus*)¹

Weed Shiner (*Notropis texanus*)

Western Sand Darter (*Ammocrypta clara*)

Please note that due to the federal status of the Higgins Eye and Sheepnose mussels, and their potential occurrence in the project area, coordination with the U.S. Fish and Wildlife Service may be necessary and is separate from this consultation and Illinois State regulations.

014c

The Department offers the following comments to aid in avoiding and minimizing impact to protected resources and natural areas, while providing conservation benefits to natural resources in the Mississippi River and adjacent natural areas:

Based on the known State-listed species in the project vicinity and the potential for suitable habitat for these species in the area proposed for development, the Department recommends that avian, herpetological, botanical, fish, and mussel surveys be conducted to confirm the absence or presence of these species. Survey proposals should be sent to this office for concurrence on methods, along with the results for final comment.

014d

Subsequently, if these species are identified during the survey, it is likely that the Department would recommend the applicant seek an Incidental Take Authorization (ITA) pursuant to Part 1080 and Section 5.5 of the *Illinois Endangered Species Protection Act* for any future action permitted in the project area.

The natural resource review reflects the information existing in the Illinois Natural Heritage Database at the time of this proposal submittal 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 development and possible implementation, the applicant must comply with the applicable statutes and regulations.

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This letter does not serve as permission to take any listed or endangered species. As a reminder, no take of an endangered species is permitted without an Incidental Take Authorization or the

014f

¹ This species was not indicated to be in the vicinity of the project by the Illinois Natural Heritage Database, however, due to the potential suitable habitat in the project area and occurrence of records in the vicinity, it was added to the list of species being reviewed for this project.

required permits. Anyone who takes a listed or endangered species without an Incidental Take Authorization or required permit may be subject to criminal and/or civil penalties pursuant to the *Illinois Endangered Species Act*, the *Fish and Aquatic Life Act*, the *Wildlife Code* and other applicable authority.

Please contact me with any questions about this review.

Sincerely,



Bradley Hayes
Manager, Impact Assessment Section
Division of Real Estate Services and Consultation
Office of Realty & Capital Planning
Illinois Department of Natural Resources
One Natural Resources Way
Springfield, IL 62702
Bradley.Hayes@Illinois.gov
Phone: (217) 782-0031

Cc. Heather Osborn-Incidental Take Authorization Coordinator
Beth Whetsell-Contaminant Assessment Section, Manager
Charlene Falco-Bureau of Land/Federal Site Remediation Section



Illinois Department of Natural Resources

SURVEY REQUEST

JB Pritzker, Governor
Colleen Callahan, Director

www.dnr.illinois.gov

Mailing address: State Historic Preservation Office, 1 Old State Capitol Plaza, Springfield, IL 62701

Carroll County
Savanna
Savanna Army Depot Parcel 20 - SE of Crim Road/Army Depot Road & Rofsteck Road/Vincent Road
SVADA
Land transfer - SVADA to Jo-Carroll Depot Local Redevelopment Authority

PLEASE REFER TO: SHPO LOG #005022420

February 26, 2020

Cathy M. Collins
Dept of the Army - Savanna Army Depot Activity
18935 B Street
Savanna, IL 61074

Dear Ms. Collins:

Thank you for requesting comments from our office concerning the possible effects of the project referenced above on cultural resources. Our comments are required by Section 106 of the National Historic Preservation Act of 1966 (16 USC 470), as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties".

015a

The project area has not been surveyed and may contain prehistoric/historic archaeological resources. Accordingly, a Phase I archaeological reconnaissance survey to locate, identify, and record all archaeological resources within the project area will be required. This decision is based upon our understanding that there has not been any large scale disturbance of the ground surface (excluding agricultural activities) such as major construction activity within the project area which would have destroyed existing cultural resources prior to your project. If the area has been heavily disturbed prior to your project, please contact our office with the appropriate written and/or photographic evidence.

015b

The area(s) that need(s) to be surveyed include(s) all area(s) that will be developed as a result of the issuance of the federal agency permit(s) or the granting of the federal grants, funds, or loan guarantees that have prompted this review. In addition to the archaeological survey please provide clear photographs of all structures in, or adjacent to, the current project area as part of the archaeological survey report.

Enclosed you will find an attachment briefly describing Phase I surveys and a list of archaeological contracting services. THE SHPO LOG NUMBER OR A COPY OF THIS LETTER SHOULD BE PROVIDED TO THE SELECTED PROFESSIONAL ARCHAEOLOGICAL CONTRACTOR TO ENSURE THAT THE SURVEY RESULTS ARE CONNECTED TO YOUR PROJECT PAPERWORK.

If you have further questions, please contact Jeff Kruchten, Chief Archaeologist at 217/785-1279 or Jeffery.kruchten@illinois.gov.

015c

Sincerely,

Robert F. Appleman
Deputy State Historic
Preservation Officer

Enclosure



Illinois Department of Natural Resources

JB Pritzker, Governor
Colleen Callahan, Director

www.dnr.illinois.gov

Mailing address: State Historic Preservation Office, 1 Old State Capitol Plaza, Springfield, IL 62701

PROTECTING ILLINOIS' CULTURAL RESOURCES An Introduction to Archaeological Surveys

Prepared by
ILLINOIS STATE HISTORIC PRESERVATION OFFICE

When you read the accompanying letter, you were notified that your Federal or State permitted, funded, or licensed project will require an archaeological survey. We also review projects that use public land. The purpose of this survey will be to determine if prehistoric or historic resources are present within the project area. If you are the average applicant you have had little or no experience with such surveys – this short introduction is designed to help you fulfill the Federal/State requirements and complete the process.

WHY PROTECT HISTORIC RESOURCES? Historic preservation legislation grew out of the public concern for the rapid loss of our prehistoric and historic heritage in the wake of increasingly large-scale Federal/State and private development. The legislation is an attempt to protect our heritage while at the same time allowing economic development to go forward.

WHAT IS THE LEGAL BASIS? The basis for all subsequent historic preservation legislation lies within the national Historic Preservation Act of 1966 (NHPA). Section 106 of NHPA requires all Federal Agencies "undertakings" to "take into account" their effect on historic properties. As of January 1, 1990, the State Agency Historic Resources Preservation Act (Public Act 86-707) requires the same for all private or public undertakings involving state agencies. An "undertaking" is defined to cover a wide range of Federal or State permitting, funding, and licensing activities. It is the responsibility of Federal/State Agencies to ensure the protection of historic resources and the State Historic Preservation Office (SHPO) regulates this effort. In Illinois the SHPO is part of the Illinois Historic Preservation Agency (IHPA).

WHAT IS AN ARCHAEOLOGICAL SURVEY? An archaeological survey includes both (1) an examination of the written records, such as county plat books, published and unpublished archaeological reports, state site files, and (2) a field investigation of the project area to determine if prehistoric or historic resources are present. This process of resource identification is called a Phase I survey.

WHAT DOES A PHASE I SURVEY REQUIRE? Archaeological evidence is normally buried beneath the surface of the ground. To determine if an archaeological site is present it is necessary to get below this surface. The most efficient way is by plowing. If the project area is or can be plowed then the artifactual evidence will be brought to the surface and systematic pedestrian surveys (walkovers) will determine if a site is present. These walkovers are best done when the vegetation is low in the fall or spring. If the project area is covered with vegetation then small shovel probes (1' sq.) are excavated on a systematic grid pattern (usually 50' intervals) to sample the subsurface deposits. Where deeply buried sites may be present, such as in floodplains, deep coring or machine trenching may be required.

WHO DOES ARCHAEOLOGICAL SURVEYS? Professional archaeologists who meet the Federal standards set forth in the Secretary of the Interior's Professional Qualifications Standards (48 FR 44738-9) may conduct Federal surveys, while those meeting the State standards set forth in the Archaeological and Paleontological Resources Protection Act (20 ILCS 3435) may conduct surveys on public land in the State (see the other side of this sheet for information on obtaining the services of a contract archaeologist). The applicant is responsible for obtaining and paying for such services.

AFTER THE SURVEY – WHAT NEXT? When the field investigations are completed the archaeologist will submit a report of their findings and recommendations to the applicant. **IT IS THE RESPONSIBILITY OF THE APPLICANT TO FORWARD TWO (2) PAPER COPIES AND ONE (1) CD WITH THE REPORT IN PDF FORMAT TO THE SHPO FOR EVALUATION AND FINDINGS.** If no sites were found or the sites found are not eligible for the National Register the project may proceed. Occasionally, a significant archaeological site may be encountered. In such a case the SHPO and the Federal or State Agency will work with the applicant to protect both the cultural resources and to facilitate the completion of your project.

NEED FURTHER ASSISTANCE? The SHPO is here to assist you and the Federal/State agencies in complying with the mandates of the historic preservation legislation. If you have questions or need assistance with archaeological resources protection or Federal/State compliance, please contact the Archaeology Section, Review & Compliance, Illinois State Historic Preservation Office, One Old State Capitol Plaza, Springfield, Illinois 62701 (217-782-4836).

OVER



Illinois Department of Natural Resources

www.dnr.illinois.gov

JB Pritzker, Governor
Colleen Callahan, Director

Mailing address: State Historic Preservation Office, 1 Old State Capitol Plaza, Springfield, IL 62701

Illinois State Historic Preservation Office – Archaeology Section

Information for Developers and Agencies about general procedures for Phase 2 archaeology projects

Anyone notified of an archaeological site subject to Phase 2 testing in their project area, has several options:

1. Preserve the site by planning your project to avoid or greenspace the site, a deed covenant may be necessary depending on the land ownership and the law the project is being reviewed under.
2. Hire an archaeological firm to conduct a Phase 2 project on the site.
3. Choose a different location for the project (generally means starting review process over from scratch, but there will be rare occasions when this is actually the fastest and cheapest option). This is something you may wish to consider if there are burials in the project area, or an extremely large or dense site in the project area.

Phase 2 archaeological projects consist of fieldwork, analysis, and report by the archaeological firm, and then review of the report by the IHPA and sometimes also by the funding or permitting agency, with additional work required part of time depending on the significance of the site(s). However, if a project has no significant sites after a Phase 2 project has been completed and reviewed, then the archaeology is completed as soon as IHPA accepts the report. If a project area has more than 1 site, each one is reviewed independently, in other words, one could be determined not significant and while another one is determined significant or potentially significant.

Phase 2 field work generally consists of obtaining good artifact type and location data from the site surface by methods such as grid collections, piece plotting, etc., this is followed by a small scale excavation. In some cases the fieldwork (commonly called test units) can be done with assistance of machines like backhoes or occasionally even large equipment like belly scrapers (plowed or partially disturbed sites), but sometimes it is necessary to dig by hand (mounds, unplowed sites, or inaccessible locations). The test units are excavated to the base of the plow zone or topsoil, and then the base of the unit is checked for presence of archaeological features (foundations, pits, hearths, burials, middens, etc.) If features are present, a small number (generally not more than 5-10) of them are excavated to provide information about the site's age, function, integrity, etc. Samples of soil from each feature for botanical and zoological analysis are usually taken. Also on floodplains of large rivers, several additional "deep" trenches are usually necessary to check for buried sites. The amount of time required for fieldwork is highly dependent on the size of a site, on whether machines can be used, and on the density of features, as well as the weather.

Analysis at Phase 2 consists of identifying and inventorying all of the artifacts recovered and preparing data recorded in the field for a report. The length of time needed is again highly variable based on the factors listed above. The report describes the field and lab information, provides a preliminary interpretation of the site, and makes recommendations concerning the significance of the site.

The archaeology staff at the State Historic Preservation Office (SHPO in Illinois) and sometimes the archaeologists at the lead funding or permitting agency review the report. Based on the report and their knowledge of regional archaeological, they determine (following criteria outlined in the appropriate law and regulations for each project) if the work done was acceptable, and whether the site(s) are not significant and need no further investigation or are significant. If a site is significant (meets the eligibility criteria for the National Register of Historic Places), the choices are mitigation (generally by complete excavation) or preservation.

ALL PHOTOS AND MAPS CONTAINED IN ALL REPORTS SHOULD BE SUBMITTED IN COLOR WITH 2 HARD COPIES AND ONE PDF VERSION ON A CD.

Jeffery Kruchten, Chief Archaeologist (7-16-2018)

ILINOIS-BASED CONSULTING SERVICES WITH PROFESSIONAL ARCHAEOLOGISTS In order to assist agencies, engineering firms, and others who require professional archaeological services the Illinois State Historic Preservation Office (SHPO) has listed below Illinois-based firms with professional archaeologists currently performing contract archaeological compliance work. Based on documentation supplied by them these individuals appear to meet current Federal qualifications. This list is provided for your assistance, however, you may use any archaeologist who meets the minimum qualifications as set forth in Secretary of the Interior's Professional Qualifications Standards (36 CFR 61). Federal and state regulations require a completed graduate degree with an emphasis in archaeology and 16 months of professional archaeological experience (**BOLD names** below). If you have any questions please contact SHPO at 217-782-4836. THE INCLUSION OF INDIVIDUALS OR ORGANIZATIONS ON THIS LIST DOES NOT CONSTITUTE ANY RECOMMENDATION OR ENDORSEMENT OF THEIR PROFESSIONAL EXPERTISE OR PERFORMANCE RECORD.

CHICAGO METRO REGION

Dr. Kevin P. McGowan
Public Service Archaeology Prgm
Chicagoland Office (UI-UC)
7428 Bradford Ct.
Gurnee, Illinois 60031
847-287-9045 Fax-217-244-3490
kevin57m@earthlink.net

Dr. Leslie B. Kirchler, RPA
Ecology and Environment, Inc.
33 West Monroe
Chicago, Illinois 60603
312/578-9243 Ext. 4109-Office
312/802-5598-Cell
leslie.kirchler-Owen@ene.com

Dr. Thomas E. Berres
OurHeritage Archaeological Svcs, Inc.
983 Quail Run
DeKalb, Illinois 60115-6117
815-754-9611 / 758-5692 (fax)
bearus1@aol.com

Jay Martinez, M.A., RPA
Midwest Archaeological
Research Services
P.O. Box 2533
Crystal Lake, Illinois 60039
815-568-0680
jmartinez.mars@gmail.com

Jim Snyder, MA
Civil & Environmental Consultants, Inc.
555 Butterfield Road, Suite 300
Lombard, Illinois 60148
630/963-6026 or 877/963-6026
Fax-630/963-6027
jsnyder@cecinc.com

Dr. Cynthia L. Balek, PhD, RPA 15689
Archaeology & Geomorphology Services
2220 Mayfair Avenue
Westchester, Illinois 60154
708-308-4713
clb2220@gmail.com

CHICAGO METRO REGION CONT

Paul P. Kreisa, PHD, RPA
Stantec Consulting Services, Inc.
701 E. 22nd Street, Suite 115
Lombard, IL 60148
240/793-1992
Paul.kreisa@stantec.com

Mr. Douglas Kullen
Burns & McDonnell
1431 Opus Place, Suite 400
Downers Grove, Illinois 60515
630/515-4626, Cell-630/408-2385
dkullen@burnsmcd.com

Ben Banks, MA, RPA
Atwell, LLC
1245 East Diehl Road, Suite 100
Naperville, Illinois 60563
866/850-4200
bbanks@atwell-group.com

Anastasis Gilmer, M.A., RPA
Jonathan Libbon, M.A., RPA
SWCA Environmental Consultants
200 W. 22nd St., Suite 220
Lombard, Illinois 60148
630/705-1762
smitchell@swca.com, agilmer@swca.com

Dr. Phil Millhouse
Red Gates Archaeology
410 Wight Street
Galena, Illinois 61036
608/205-2753 / Cell - 608/718-9324
philipgmillhouse@gmail.com

Veronica Parsell, MA
Cardno JFNew
6605 Steger Road, Unit A
Monee, Illinois 60449
708/534-3450, cell-574/229-8747
Veronica.parsell@cardno.com

Thomas Zych, MS, RPA
Lowlands Cultural Resources, LLC.
670 Harasek Street
Lemont, IL 60439
630/247-5594
lowlandsculturalresources@gmail.com

Thomas Bodor, MA, RPA
Michael Baker International, Inc.
200 West Adams St., Suite 2800
Chicago, IL 60606
412/269-2049
Thomas.bodor@mbakerintl.com

CENTRAL REGION

Ms. Karen A. Atwell
Farmland Archaeological Services
10475 N 2300 Avenue
Geneseo, Illinois 61254
309-507-1330
Karen@karenatwell.com

Mr. Addison Kimmel, MA, RPA
1916 21st Street
Rock Island, IL 61201
513/325-2776
Addison.kimmel.rrc@gmail.com

Mr. Keith L. Barr
Archaeological & Architectural Surveys
Old Inn Farm
Rural Route 1
Fairview, Illinois 61432
309-778-2536

Mr. Lawrence A. Conrad
Western Illinois Archaeology Research
Center, 1104 West Piper Street
Macomb, Illinois 61455
309-333-6783 or 836-3811
La-conrad@wiu.edu

Dr. Charles L. Rohrbaugh
Archaeological Consultants
302 Kelly Drive
Normal, Illinois 61761
309-454-6590

Dr. Gregory Walz
University of Illinois
Anthropology Department
Public Service Archaeology Program
1707 South Orchard Street
607 South Matthews Avenue
Urbana, Illinois 61801
217-333-1636 Fax-217-244-3490
gwalz@netonecom.net

CENTRAL REGION CON'T

Dr. Brian Adams

Dr. Thomas Loebel
University of Illinois Champaign-Urbana
UIUC-ITARP Statewide Office
23 East Stadium Drive
209 Nuclear Physics Lab (MC 571)
Champaign, Illinois 61820
217-333-0667 / 244-7458 (fax)

Mr. Mark C. Branstner

Great Lakes Research, Inc.
Post Office Box 2341
Champaign, Illinois 61825-2341
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mark.branstner@branstner.com

Dr. Fred A. Finney

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Post Office Box 106
St. Joseph, Illinois 61873-0106
217-469-0106 (voice fax same)
Cell 217-778-0348
FAFinney@aol.com

Dr. Jason King

Center for American Archeology
(Kampsville Archeological Center)
Post Office Box 22
Kampsville, Illinois 62053
618-653-4316 / 4232 (fax)
jking@caa-archeology.org

Mr. David J. Nolan

ISAS Western Illinois Survey Division
604 East Vandalia
Jacksonville, Illinois 62650
217-243-9491 / 7991 (fax)
Macomb Lab, 309-833-3097
Spfld Lab, 217-522-4295/4395 (fax)
djnolan@illinois.edu

Dr. Brooke M. Morgan

Curator of Anthropology
Illinois State Museum Society
1011 East Ash Street
Springfield, Illinois 62703
217/785-8930
Brooke.morgan@illinois.gov

Mr. Floyd Mansberger

Fever River Research
Post Office Box 5234
Springfield, Illinois 62705
217-525-9002 / 6093 (fax)
217/341-8138
fmansberger@comcast.net

Mr. Joseph Craig

Prairie Archaeology & Research
Environmental Compliance Consultants
Post Office Box 5603
Springfield, Illinois 62705-5603
217-544-4881 / 4988 (fax)
jcraig@prairiearchaeology.com
jcraig@eccinc.org

Edward T. Saffran, Archaeologist

309 East South Street
Neponset, Illinois 61345
309 883-1163
edsaffran@gmail.com

Joyce McKay

Archaeological & Architectural Historian
P.O. Box 409
Hampton, Illinois 61256
309 755-3519
trmckay@wisc.edu

METRO EAST REGION

Mr. Don Booth

SCI Engineering, Inc.
650 Pierce Boulevard
O'Fallon, Illinois 62269
Ph: 618-206-3034
Cell: 618 779-4281
dbooth@sciengineering.com

Dr. Alleen Betzenhauser

Coordinator, American Bottom Field Sta
Illinois State Archaeological Survey
Institute Natural Resource Sustainability
University of IL at Urbana-Champaign
13 Gateway Drive
Collinsville, Illinois 62234
618-855-9206
betzenha@illinois.edu

Dr. John Kelly

Central Mississippi Valley
Archaeological Research Institute
Post Office Box 413
Columbia, Illinois 62236
618-540-8109
jkelly@wustl.edu

Joseph Harl

Robin Jorcke Harl
Archaeological Research Center of
St. Louis, Inc.
709 20th Street
Rock Island, Illinois 61201
314-426-2577 / 2599 (fax)
arc@arcstl.com

SOUTHERN REGION

Mr. Steve Titus

American Resources Group, Ltd.
12th North Washington Street
Carbondale, Illinois 62901
618-529-2741 / 457-5070 (fax)
steve@argltd.com;
archeology@argltd.com

Dr. Mark Wagner

Southern Illinois University
Center for Archaeological Investigations
Mail Code 4527
Carbondale, Illinois 62901
618-453-5031 / 8467 (fax)
mjwagner@siu.edu

Mr. H. Blaine Ensor

Historic Properties Consultants (HPC)
1515 Oak St.
Murphysboro, Illinois 62966
Office 618 684-6292
blaine@historicpropertiesconsultants.com

Michele Lorenzini

Mound City Arch. Services
70 Hairpin Drive, #12
Edwardsville, Illinois 62026-0012
314 723-2226
lorenzini@moundcity.net

Mr. Charles O. Witty

Looking Glass Prairie Archaeological
Reconnaissance (LGPAR)
613 West St. Louis Street
Lebanon, Illinois 62254
618 623-8749
Charles.witty@sbcglobal.net

Jessica Allgood

405 Palestine Road
Stonefort, Illinois 62987
859/707-6384
jessicaraycox@gmail.com



Illinois Department of Natural Resources

www.dnr.illinois.gov

JB Pritzker, Governor
Colleen Callahan, Director

016

Mailing address: State Historic Preservation Office, 1 Old State Capitol Plaza, Springfield, IL 62701

Carroll County

PLEASE REFER TO: SHPO Log #005022420

Savanna

11CA1, 11CA142 - unevaluated, Section:2-Township:25N-Range:2E, 11CA194

Savanna Army Depot Parcel 20 - SE of Crim Road/Army Depot Road & Rofsteck Road/Vincent Road

SVADA

Land transfer - SVADA to Jo-Carroll Depot Local Redevelopment Authority

December 24, 2020

Alex Sweeney

Brockington and Associates, Inc.

31 Park of Commerce Way, Suite 200A

Savannah, GA 31405

Dear Mr. Sweeney:

We have reviewed the documentation provided for the above referenced project. In our opinion, the project as proposed will have no adverse effect on sites 11CA1 & 142 which have not been evaluated for listing on the National Register of Historic Places as defined in 36 CFR Part 800.5 (b). Site 11CA194 is not eligible for listing on the National Register of Historic Places.

If these plans should be modified, please notify our office. Please retain this letter as evidence of compliance with Section 106 of the National Historic Preservation Act of 1966, as amended.

If you have any further questions please contact Jeff Kruchten, Chief Archaeologist at 217/785-1279 or Jeffery.kruchten@illinois.gov.

Sincerely,

Robert F. Appleman
Deputy State Historic
Preservation Officer

016a

Subject: FW: RE: Preparation of an Environmental Assessment for the implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity Illinois

From: Ben Crawford [ben.crawford@winnebago-tribe.com]

Sent: Thursday, February 27, 2020 9:35 AM

To: Collins, Cathleen M CIV USARMY HQDA DCS G-9 (USA)

Subject: [Non-DoD Source] RE: Preparation of an Environmental Assessment for the implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity Illinois

Dear Ms. Collins,

My name is Eben Crawford, I am temporarily serving as THPO for the Winnebago Tribe of Nebraska until a new candidate is selected in mid-march. Emily DeLeon has not served as THPO for some time, so please address all future communication to "The Office of the THPO".

Our office recently received a letter from you regarding the EA preparation for Parcel 20. The Winnebago Tribe of Nebraska has no known sites in the area, and thus no concerns with this project.

Thank you,
Eben Crawford

Eben Crawford
Museum Curator & NAGPRA Assistant, Winnebago Tribe of Nebraska
402-922-0897

017a



Miami Tribe of Oklahoma

3410 P St. NW, Miami, OK 74354 • P.O. Box 1326, Miami, OK 74355
Ph: (918) 541-1300 • Fax: (918) 542-7260
www.miamination.com



Via email: cathleen.m.collins.civ@mail.mil

March 18, 2020

Cathy M. Collins
Department of the Army
Savanna Army Depot Activity
18935 B Street
Savanna, IL 61074

Re: Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois – Comments of the Miami Tribe of Oklahoma

Dear Ms. Collins:

Aya, kikwehsitoole – I show you respect. My name is Diane Hunter, and I am the Tribal Historic Preservation Officer for the Federally Recognized Miami Tribe of Oklahoma. In this capacity, I am the Miami Tribe's point of contact for all Section 106 issues.

The Miami Tribe offers no objection to the above-referenced project at this time. However, as the project is within the ancestral homelands of the Miami Tribe and possibly near the location of an archaeological site, please continue to send any updated information regarding this project to me at dhunter@miamination.com. If any human remains or Native American cultural items falling under the Native American Graves Protection and Repatriation Act (NAGPRA) or archaeological evidence is discovered during any phase of this project, the Miami Tribe requests immediate consultation with the entity of jurisdiction for the location of discovery. In such a case, please contact me at 918-541-8966 or by email at dhunter@miamination.com.

The Miami Tribe requests to serve as a consulting party to the proposed project.

Respectfully,

Diane Hunter

Diane Hunter
Tribal Historic Preservation Officer

Subject: FW: [Non-DoD Source] Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

From: Colleen A. Bell [colleen.bell@osagenation-nsn.gov]

Sent: Monday, July 06, 2020 9:50 AM

To: Collins, Cathleen M CIV USARMY HQDA DCS G-9 (USA)

Subject: [Non-DoD Source] Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Date: June 30, 2020

File: 1920-3001IL-2

RE: USACE, Savanna Army Depot Activity, Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Carroll County, Illinois

Savanna Army Depot Activity
Cathy Collins
18935 B Street
Savanna, IL 61074

Dear Ms. Collins,

The Osage Nation has received notification and accompanying information for the proposed project listed as USACE, Savanna Army Depot Activity, Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Carroll County, Illinois. **The Osage Nation Historic Preservation Office requests a copy of the cultural resource survey report for review and comment.**

In accordance with the National Historic Preservation Act, (NHPA) [54 U.S.C. § 300101 et seq.] 1966, undertakings subject to the review process are referred to in 54 U.S.C. § 302706 (a), which clarifies that historic properties may have religious and cultural significance to Indian tribes. Additionally, Section 106 of NHPA requires Federal agencies to consider the effects of their actions on historic properties (36 CFR Part 800) as does the National Environmental Policy Act (43 U.S.C. 4321 and 4331-35 and 40 CFR 1501.7(a) of 1969).

The Osage Nation has a vital interest in protecting its historic and ancestral cultural resources. **The Osage Nation anticipates reviewing and commenting on the survey report for the proposed USACE, Savanna Army Depot Activity, Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Carroll County, Illinois.**



Should you have any questions or need any additional information please feel free to contact me at the number listed below. Thank you for consulting with the Osage Nation on this matter.

Colleen A. Bell

Archaeologist



Colleen A. Bell

Archaeologist, MA, RPA

Osage Nation Historic Preservation Office

627 Grandview Avenue, Pawhuska, OK 74056

Office: 918-287-0041 | Fax: 918-287-5376

colleen.bell@osagenation-nsn.gov < Caution-mailto:colleen.bell@osagenation-nsn.gov >



Caution-<https://www.osagenation-nsn.gov/who-we-are/historic-preservation> < Caution-<https://www.osagenation-nsn.gov/who-we-are/historic-preservation> >

Base Realignment and Closure Savanna Army Depot Activity
LRA Parcel 20 Environmental Impact Statement
CEQ Unique Identifier: EISX-007-21-000-1729699335

Public Scoping Comment Form

Scoping comments should be submitted by February 15, 2025

Comments can be submitted by email to: SVADAEIS@tetratech.com	or By U.S. mail to: SVADA EIS c/o Tetra Tech 107 St. Francis Street, Suite 2370 Mobile, AL 36602
---	---

Name: Melinda Appel
Organization: Carroll County Board
Address: [REDACTED] Thomson, IL 61285
Email: [REDACTED]

Affiliation (please check a box):

- | | |
|---|---|
| <input checked="" type="checkbox"/> Elected Official | <input type="checkbox"/> Business/commercial organization |
| <input checked="" type="checkbox"/> Local government | <input type="checkbox"/> Historic preservation organization |
| <input type="checkbox"/> State government | <input type="checkbox"/> Nongovernmental organization |
| <input type="checkbox"/> Federal government | <input type="checkbox"/> Private citizen |
| <input type="checkbox"/> Native American Tribe/organization | <input type="checkbox"/> Other: _____ |

Please check the box next to the topic area(s) that you have comments/concerns about and write your comment on the reverse.

- | | |
|--|--|
| <input type="checkbox"/> Aesthetics and visual resources | <input type="checkbox"/> NEPA |
| <input type="checkbox"/> Air quality/climate | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Biological resources | <input type="checkbox"/> Proposed action or alternatives |
| <input type="checkbox"/> Coordination/communication | <input type="checkbox"/> Socioeconomics |
| <input type="checkbox"/> Cultural and historic resources | <input type="checkbox"/> Traffic/transportation |
| <input type="checkbox"/> Cumulative effects | <input type="checkbox"/> Utilities and infrastructure |
| <input type="checkbox"/> Environmental justice/children | <input type="checkbox"/> Water resources |
| <input type="checkbox"/> Geology and soils | <input type="checkbox"/> General Support |
| <input type="checkbox"/> Hazardous materials and waste | <input type="checkbox"/> General Opposition |
| <input type="checkbox"/> Land use | <input checked="" type="checkbox"/> Other: <u>Economic development</u> |
| <input type="checkbox"/> Mitigation | |
| <input type="checkbox"/> Navigation | |

For more information regarding this project visit:
<https://www.lrd.usace.army.mil/Submit-ArticleCS/Programs/Article/3901394/>

Comments:

I am excited about using the area for economic growth. We need jobs and money to sustain the Recreational part of the project. I'm excited for the tourism the recreation will attract.

020a

~~Wow~~ I support the project

Melinda Appel

Thank you for your comments.

Base Realignment and Closure Savanna Army Depot Activity
 LRA Parcel 20 Environmental Impact Statement
 CEQ Unique Identifier: EISX-007-21-000-1729699335

Public Scoping Comment Form

Scoping comments should be submitted by February 15, 2025

Comments can be submitted by email to: SVADAEIS@tetrattech.com	or By U.S. mail to: SVADA EIS c/o Tetra Tech 107 St. Francis Street, Suite 2370 Mobile, AL 36602
--	---

Name:

DAVID SOLDAT

Organization:

CARROLL COUNTY BOARD OF DIRECTORS

Address:

LAKE CARROLL, IL 60466

Email:

Affiliation (please check a box):

- | | |
|---|---|
| <input type="checkbox"/> Elected Official | <input type="checkbox"/> Business/commercial organization |
| <input checked="" type="checkbox"/> Local government | <input type="checkbox"/> Historic preservation organization |
| <input type="checkbox"/> State government | <input type="checkbox"/> Nongovernmental organization |
| <input type="checkbox"/> Federal government | <input type="checkbox"/> Private citizen |
| <input type="checkbox"/> Native American Tribe/organization | <input type="checkbox"/> Other: _____ |

Please check the box next to the topic area(s) that you have comments/concerns about and write your comment on the reverse.

- | | |
|---|--|
| <input type="checkbox"/> Aesthetics and visual resources | <input type="checkbox"/> NEPA |
| <input type="checkbox"/> Air quality/climate | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Biological resources | <input type="checkbox"/> Proposed action or alternatives |
| <input type="checkbox"/> Coordination/communication | <input type="checkbox"/> Socioeconomics |
| <input type="checkbox"/> Cultural and historic resources | <input type="checkbox"/> Traffic/transportation |
| <input type="checkbox"/> Cumulative effects | <input type="checkbox"/> Utilities and infrastructure |
| <input type="checkbox"/> Environmental justice/children | <input type="checkbox"/> Water resources |
| <input type="checkbox"/> Geology and soils | <input type="checkbox"/> General Support |
| <input checked="" type="checkbox"/> Hazardous materials and waste | <input type="checkbox"/> General Opposition |
| <input type="checkbox"/> Land use | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Mitigation | _____ |
| <input type="checkbox"/> Navigation | _____ |

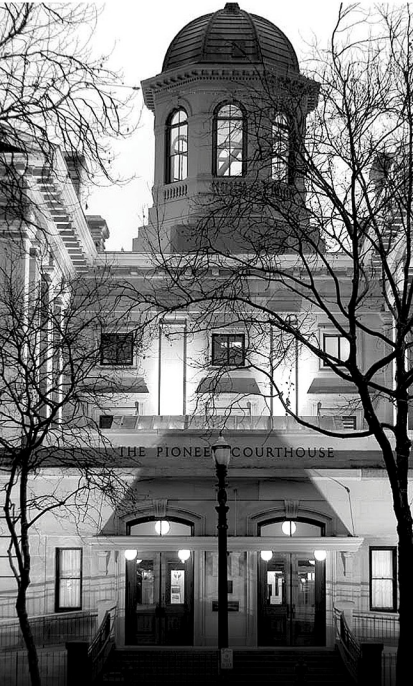
For more information regarding this project visit:
<https://www.lrd.usace.army.mil/Submit-ArticleCS/Programs/Article/3901394/>

Comments:

IS THERE AN ISSUE of POLLUTED GROUND
WATER DUE TO BURIED HAZARDOUS MATERIALS
CAUSING CANCER ?

021a

Thank you for your comments.



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ENVIRONMENTAL IMPACT STATEMENT

TRANSCRIPT OF
SCOPING MEETING

HELD VIA ZOOM ON
THURSDAY, JANUARY 16, 2025
5:22 P.M.

HELD AT
WEST CARROLL HIGH SCHOOL AUDITORIUM
500 CRAGMOOR STREET
SAVANNA, ILLINOIS 61074

REMOTE APPEARANCES

Rowan McConville

Sara Renkes

Julie Bickelhaupt

Erika Schau

Elizabeth Grissinger

Ronald H. Smith

Mark Nilson, Naegeli Technician

TRANSCRIPT OF
SCOPING MEETING
HELD VIA ZOOM ON
THURSDAY, JANUARY 16, 2025
5:22 P.M.

ROWAN MCCONVILLE: So we'll just ask you to state your name beforehand and spell it out for us.

SARA RENKES: Okay.

ROWAN MCCONVILLE: And, Myriam, are you ready?

THE REPORTER: I am sorry. I didn't hear you. I'm ready.

ROWAN MCCONVILLE: We've got someone ready to make a comment. Are you ready?

THE REPORTER: I am ready. Please go ahead.

Please state your full name and spell it.

SARA RENKES: Okay. My name is Sara Renkes, S-A-R-A, R-E-N-K-E-S. So the last name is R-E-N-K-E-S. Yes.

THE REPORTER: Thank you.

SARA RENKES: Yeah.

ROWAN MCCONVILLE: There's a chair if

1 you'd like to sit. Sorry.

2 SARA RENKES: No, you're good.

3 I just wanted to state my support for the
4 LRA's Economic Development Plan, and would like to
5 have the Army support in helping them facilitate
6 that plan. The second comment I would like to make
7 is if any extra funding could be obtained for the
8 infrastructure to that area. And I think that's --
9 that's all I have.

10 ROWAN MCCONVILLE: Thank you so much.

11 SARA RENKES: Thank you very much. Yes.

12 ROWAN MCCONVILLE: I appreciate it.

13 (WHEREUPON, a discussion was held off the
14 record.)

15 ROWAN MCCONVILLE: Okay. So we have our
16 court reporter here, remotely.

17 JULIE BICKELHAUPT: Okay.

18 ROWAN MCCONVILLE: And we'll just ask you
19 to state your full name first, spell it out, and
20 then give us your comment. And then I'm also
21 recording just in case you know any --

22 JULIE BICKELHAUPT: Yes, technical
23 difficulties.

24 ROWAN MCCONVILLE: -- technical
25 difficulty. So --

022a

022b

1 JULIE BICKELHAUPT: All right. I am Julie
2 Bickelhaupt. J-U-L-I-E. B as in boy, I-C-K-E-L-H-
3 A-U, P as in Paul, T as in Thomas. I am from Mount
4 Carroll. I am the county board chair.

5 I think the biggest thing I'm seeing from
6 being here, talking with the LRA and the -- the Port
7 Authority is, I would like to see some economic
8 growth for the area as well, you know, for the towns
9 that surround it, but also for the county or
10 counties potentially. That would be a very good
11 thing for our area. And that space, it would be
12 wonderful if we could use it for something that
13 could create economic growth

14 So that's pretty much what I feel, and I
15 would like to see the most out of it. I'm sure
16 there's some other options that could come along
17 with it, but, you know, see that it benefits and
18 provides stability through the area.

19 ROWAN MCCONVILLE: Okay. Great. Thank
20 you so much.

21 JULIE BICKELHAUPT: All right. Thank you.

22 ROWAN MCCONVILLE: Have a good evening.

23 JULIE BICKELHAUPT: You too.

24 (WHEREUPON, a discussion was held off the
25 record.)

1 ROWAN MCCONVILLE: Okay. So what we will
2 ask you to do is we'll just have you state your full
3 name and then spell it out for us.

4 ERIKA SCHAU: Okay.

5 ROWAN MCCONVILLE: And then you can let a
6 read.

7 ERIKA SCHAU: Okay.

8 ROWAN MCCONVILLE: And I'll also be
9 recording just in case we have any technical --

10 ERIKA SCHAU: Sure.

11 ROWAN MCCONVILLE: -- difficulties. So
12 you're free to go.

13 ERIKA SCHAU: Okay. My name is Erika
14 Schau, E-R-I-C-A, S-C-H-A-U.

15 And my first concern is the condition of
16 Army Depot Road itself. Right now there is a lot of
17 traffic with the grain bins back there. So, you
18 know, spring, fall, all throughout the year, every
19 day there's lots of trucks and that road is
20 horrendous. And the patchwork just does not -- it
21 does not work. It doesn't last. It may last a
22 month or two and then it just crumbles.

23 My second is, with the -- all the dredging
24 that would go on with putting barges back there, the
25 environmental impact and the impact that it has.

1 There's -- there's several people that live right
2 along the Mississippi River, like in the backwaters
3 right back there. So there's a -- I mean it's
4 really -- it's just so quiet and peaceful and I
5 think it would be detrimental to our environment. I
6 think that's all comments I had.

7 ROWAN MCCONVILLE: Okay. Great. Thank
8 you so much for your comment.

9 ERIKA SCHAU: You bet.

10 ROWAN MCCONVILLE: Great. Have a great
11 evening.

12 ERIKA SCHAU: Thanks. You too.

13 ROWAN MCCONVILLE: Thank you so much for
14 coming out.

15 ERIKA SCHAU: Yeah.

16 ROWAN MCCONVILLE: All good?

17 THE REPORTER: Excellent job you're doing.
18 (WHEREUPON, a discussion was held off the
19 record.)

20 ROWAN MCCONVILLE: If you just have a seat
21 and give us your full name.

22 ELIZABETH GRISSINGER: Okay.

23 ROWAN MCCONVILLE: And spell it for us and
24 then you can let a read.

25 ELIZABETH GRISSINGER: It's not bad. It's

--

ROWAN MCCONVILLE: No, no. Just --

ELIZABETH GRISSINGER: Okay.

ROWAN MCCONVILLE: -- we're ready for you.

ELIZABETH GRISSINGER: Okay.

ROWAN MCCONVILLE: Mm-hmm.

ELIZABETH GRISSINGER: Elizabeth
Grissinger.

ROWAN MCCONVILLE: Mm-hmm. Spell it.
Yes, ma'am.

ELIZABETH GRISSINGER: E-L-I-Z-A-B-E-T-H,
G-R-I-S-S-I-N-G-E-R.

And my comment is with all the flooding
that has happened all of these many, many years with
Apple River and of course the Mississippi overflows
and then Apple River overflows. But I see potential
where the Commander's Lake could be dredged out
deeper.

And that would allow for overflow, which
in turn would help the residents along the Army
Depot Road that currently own property, the farmer,
and the other resident that lives there, possibly
would have less flooding in the future.

ROWAN MCCONVILLE: Okay. Great. Thank
you so much for your comment. Thank you for coming

1 out this evening.

2 Are we all good over there?

3 THE REPORTER: Yes. Perfect. Thank you.

4 ROWAN MCCONVILLE: Good deal. Okay.

5 Let me go see if I can bring anybody else
6 in.

7 THE REPORTER: Mm-hmm.

8 (WHEREUPON, a discussion was held off the
9 record.)

10 ROWAN MCCONVILLE: Have a seat. So you'll
11 just tell us what you think. So what we'll have you
12 do is you'll tell us your full name and then you'll
13 spell it out for us and then you'll give us your
14 comment.

15 RONALD H. SMITH: Okay.

16 ROWAN MCCONVILLE: Right. We're ready for
17 you.

18 RONALD H. SMITH: Okay. My name's Ronald.
19 My middle initial is H. Smith. I live in Jo Daviess
20 County, Galena, Illinois. I'm on the LRA Board.
21 I've been on it for many years, and so I've been
22 involved in a lot of projects down there like this
23 one here now.

24 And I'm definitely in favor. I'm glad now
25 that we're looking at these parcels and being able

1 to get those and develop them. We did a study on
2 that parcel 20, this is the -- back in June of 2023.
3 And it spells out here by each area what it has and
4 everything.

5 And it all turned out real positive
6 release because years ago, you know, we used to have
7 the riverfront and then we didn't -- we didn't get
8 that or we lost that because they were going to
9 build a prison there. So fish and wildlife had land
10 internally, so they -- we had a trade and they took
11 over the riverfront.

12 And then the LRA got that property there
13 and that's where the prison was supposed to go, but
14 then it got built down -- down below. I think so.
15 But definitely we got a good board and the people
16 working on some of these things that were economic
17 development and with the opportunity at the railroad
18 and the water there yet, you got to get access to
19 that.

20 Because when you can ship grain by bulk
21 barges, it's more -- well, they say it's edible than
22 by some of the trucks. I never knew that before.
23 Yeah. So really that's all I have to say. We got a
24 good organization. It's good people working. Now
25 with the Port Authority working with us too, that's

1 good that that's going forward.

2 ROWAN MCCONVILLE: Right.

3 RONALD H. SMITH: They got a lot of power,
4 access to money, and do things and take over things.

5 ROWAN MCCONVILLE: Yes, sir.

6 RONALD H. SMITH: Okay. Thank you for
7 doing what you're doing.

8 ROWAN MCCONVILLE: Thank you so much for
9 your comment and thank you for coming this evening.

10 (WHEREUPON, a discussion was held off the
11 record.)

12 ROWAN MCCONVILLE: Doing last call now,
13 but should be wrapping up.

14 THE REPORTER: No problem.

15 Thank you.

16 (WHEREUPON, a discussion was held off the
17 record.)

18 ROWAN MCCONVILLE: All right. Well we're
19 going to call it an evening. Thank you so much for
20 your help.

21 THE REPORTER: Of course.

22 You're welcome.

23 Thank you as well.

24 Have a great evening now.

25 ROWAN MCCONVILLE: You too.

1 Bye.

2 THE REPORTER: Thanks.

3 Bye, Rowan.

4 Take care.

5 (WHEREUPON, the SCOPING MEETING concluded
6 at 6:31 p.m.)

CERTIFICATE

I, Myriam Joho Papadopoulos, do hereby certify that I reported all proceedings adduced in the foregoing matter and that the foregoing transcript pages constitutes a full, true and accurate record of said proceedings to the best of my ability.

I further certify that I am neither related to counsel or any party to the proceedings nor have any interest in the outcome of the proceedings.

IN WITNESS HEREOF, I have hereunto set my hand this 30th of January, 2025.

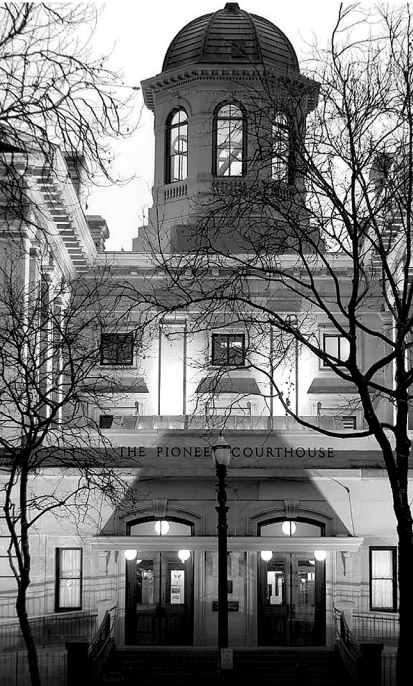
A handwritten signature in dark ink, appearing to read 'Myriam', is written over a faint, circular embossed seal. The signature is fluid and cursive.

Myriam Joho Papadopoulos, #2357

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SAVANNA ARMY DEPOT ACTIVITY ENVIRONMENTAL IMPACT STATEMENT

TRANSCRIPT OF SCOPING MEETING

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THURSDAY, JANUARY 16, 2025
5:22 P.M.

HELD AT
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500 CRAGMOOR STREET
SAVANNA, ILLINOIS 61074

REMOTE APPEARANCES

Rowan McConville

Sara Renkes

Julie Bickelhaupt

Erika Schau

Elizabeth Grissinger

Ronald H. Smith

Mark Nilson, Naegeli Technician

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ROWAN MCCONVILLE: So we'll just ask you to state your name beforehand and spell it out for us.

SARA RENKES: Okay.

ROWAN MCCONVILLE: And, Myriam, are you ready?

THE REPORTER: I am sorry. I didn't hear you. I'm ready.

ROWAN MCCONVILLE: We've got someone ready to make a comment. Are you ready?

THE REPORTER: I am ready. Please go ahead.

Please state your full name and spell it.

SARA RENKES: Okay. My name is Sara Renkes, S-A-R-A, R-E-N-K-E-S. So the last name is R-E-N-K-E-S. Yes.

THE REPORTER: Thank you.

SARA RENKES: Yeah.

ROWAN MCCONVILLE: There's a chair if

1 you'd like to sit. Sorry.

2 SARA RENKES: No, you're good.

3 I just wanted to state my support for the
4 LRA's Economic Development Plan, and would like to
5 have the Army support in helping them facilitate
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7 is if any extra funding could be obtained for the
8 infrastructure to that area. And I think that's --
9 that's all I have.

10 ROWAN MCCONVILLE: Thank you so much.

11 SARA RENKES: Thank you very much. Yes.

12 ROWAN MCCONVILLE: I appreciate it.

13 (WHEREUPON, a discussion was held off the
14 record.)

15 ROWAN MCCONVILLE: Okay. So we have our
16 court reporter here, remotely.

17 JULIE BICKELHAUPT: Okay.

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19 to state your full name first, spell it out, and
20 then give us your comment. And then I'm also
21 recording just in case you know any --

22 JULIE BICKELHAUPT: Yes, technical
23 difficulties.

24 ROWAN MCCONVILLE: -- technical
25 difficulty. So --

1 JULIE BICKELHAUPT: All right. I am Julie
2 Bickelhaupt. J-U-L-I-E. B as in boy, I-C-K-E-L-H-
3 A-U, P as in Paul, T as in Thomas. I am from Mount
4 Carroll. I am the county board chair.

5 I think the biggest thing I'm seeing from
6 being here, talking with the LRA and the -- the Port
7 Authority is, I would like to see some economic
8 growth for the area as well, you know, for the towns
9 that surround it, but also for the county or
10 counties potentially. That would be a very good
11 thing for our area. And that space, it would be
12 wonderful if we could use it for something that
13 could create economic growth

14 So that's pretty much what I feel, and I
15 would like to see the most out of it. I'm sure
16 there's some other options that could come along
17 with it, but, you know, see that it benefits and
18 provides stability through the area.

19 ROWAN MCCONVILLE: Okay. Great. Thank
20 you so much.

21 JULIE BICKELHAUPT: All right. Thank you.

22 ROWAN MCCONVILLE: Have a good evening.

23 JULIE BICKELHAUPT: You too.

24 (WHEREUPON, a discussion was held off the
25 record.)

023a

023b

1 ROWAN MCCONVILLE: Okay. So what we will
2 ask you to do is we'll just have you state your full
3 name and then spell it out for us.

4 ERIKA SCHAU: Okay.

5 ROWAN MCCONVILLE: And then you can let a
6 read.

7 ERIKA SCHAU: Okay.

8 ROWAN MCCONVILLE: And I'll also be
9 recording just in case we have any technical --

10 ERIKA SCHAU: Sure.

11 ROWAN MCCONVILLE: -- difficulties. So
12 you're free to go.

13 ERIKA SCHAU: Okay. My name is Erika
14 Schau, E-R-I-C-A, S-C-H-A-U.

15 And my first concern is the condition of
16 Army Depot Road itself. Right now there is a lot of
17 traffic with the grain bins back there. So, you
18 know, spring, fall, all throughout the year, every
19 day there's lots of trucks and that road is
20 horrendous. And the patchwork just does not -- it
21 does not work. It doesn't last. It may last a
22 month or two and then it just crumbles.

23 My second is, with the -- all the dredging
24 that would go on with putting barges back there, the
25 environmental impact and the impact that it has.

1 There's -- there's several people that live right
2 along the Mississippi River, like in the backwaters
3 right back there. So there's a -- I mean it's
4 really -- it's just so quiet and peaceful and I
5 think it would be detrimental to our environment. I
6 think that's all comments I had.

7 ROWAN MCCONVILLE: Okay. Great. Thank
8 you so much for your comment.

9 ERIKA SCHAU: You bet.

10 ROWAN MCCONVILLE: Great. Have a great
11 evening.

12 ERIKA SCHAU: Thanks. You too.

13 ROWAN MCCONVILLE: Thank you so much for
14 coming out.

15 ERIKA SCHAU: Yeah.

16 ROWAN MCCONVILLE: All good?

17 THE REPORTER: Excellent job you're doing.
18 (WHEREUPON, a discussion was held off the
19 record.)

20 ROWAN MCCONVILLE: If you just have a seat
21 and give us your full name.

22 ELIZABETH GRISSINGER: Okay.

23 ROWAN MCCONVILLE: And spell it for us and
24 then you can let a read.

25 ELIZABETH GRISSINGER: It's not bad. It's

--

ROWAN MCCONVILLE: No, no. Just --

ELIZABETH GRISSINGER: Okay.

ROWAN MCCONVILLE: -- we're ready for you.

ELIZABETH GRISSINGER: Okay.

ROWAN MCCONVILLE: Mm-hmm.

ELIZABETH GRISSINGER: Elizabeth
Grissinger.

ROWAN MCCONVILLE: Mm-hmm. Spell it.
Yes, ma'am.

ELIZABETH GRISSINGER: E-L-I-Z-A-B-E-T-H,
G-R-I-S-S-I-N-G-E-R.

And my comment is with all the flooding
that has happened all of these many, many years with
Apple River and of course the Mississippi overflows
and then Apple River overflows. But I see potential
where the Commander's Lake could be dredged out
deeper.

And that would allow for overflow, which
in turn would help the residents along the Army
Depot Road that currently own property, the farmer,
and the other resident that lives there, possibly
would have less flooding in the future.

ROWAN MCCONVILLE: Okay. Great. Thank
you so much for your comment. Thank you for coming

1 out this evening.

2 Are we all good over there?

3 THE REPORTER: Yes. Perfect. Thank you.

4 ROWAN MCCONVILLE: Good deal. Okay.

5 Let me go see if I can bring anybody else
6 in.

7 THE REPORTER: Mm-hmm.

8 (WHEREUPON, a discussion was held off the
9 record.)

10 ROWAN MCCONVILLE: Have a seat. So you'll
11 just tell us what you think. So what we'll have you
12 do is you'll tell us your full name and then you'll
13 spell it out for us and then you'll give us your
14 comment.

15 RONALD H. SMITH: Okay.

16 ROWAN MCCONVILLE: Right. We're ready for
17 you.

18 RONALD H. SMITH: Okay. My name's Ronald.
19 My middle initial is H. Smith. I live in Jo Daviess
20 County, Galena, Illinois. I'm on the LRA Board.
21 I've been on it for many years, and so I've been
22 involved in a lot of projects down there like this
23 one here now.

24 And I'm definitely in favor. I'm glad now
25 that we're looking at these parcels and being able

1 to get those and develop them. We did a study on
2 that parcel 20, this is the -- back in June of 2023.
3 And it spells out here by each area what it has and
4 everything.

5 And it all turned out real positive
6 release because years ago, you know, we used to have
7 the riverfront and then we didn't -- we didn't get
8 that or we lost that because they were going to
9 build a prison there. So fish and wildlife had land
10 internally, so they -- we had a trade and they took
11 over the riverfront.

12 And then the LRA got that property there
13 and that's where the prison was supposed to go, but
14 then it got built down -- down below. I think so.
15 But definitely we got a good board and the people
16 working on some of these things that were economic
17 development and with the opportunity at the railroad
18 and the water there yet, you got to get access to
19 that.

20 Because when you can ship grain by bulk
21 barges, it's more -- well, they say it's edible than
22 by some of the trucks. I never knew that before.
23 Yeah. So really that's all I have to say. We got a
24 good organization. It's good people working. Now
25 with the Port Authority working with us too, that's

1 good that that's going forward.

2 ROWAN MCCONVILLE: Right.

3 RONALD H. SMITH: They got a lot of power,
4 access to money, and do things and take over things.

5 ROWAN MCCONVILLE: Yes, sir.

6 RONALD H. SMITH: Okay. Thank you for
7 doing what you're doing.

8 ROWAN MCCONVILLE: Thank you so much for
9 your comment and thank you for coming this evening.

10 (WHEREUPON, a discussion was held off the
11 record.)

12 ROWAN MCCONVILLE: Doing last call now,
13 but should be wrapping up.

14 THE REPORTER: No problem.

15 Thank you.

16 (WHEREUPON, a discussion was held off the
17 record.)

18 ROWAN MCCONVILLE: All right. Well we're
19 going to call it an evening. Thank you so much for
20 your help.

21 THE REPORTER: Of course.

22 You're welcome.

23 Thank you as well.

24 Have a great evening now.

25 ROWAN MCCONVILLE: You too.

1 Bye.

2 THE REPORTER: Thanks.

3 Bye, Rowan.

4 Take care.

5 (WHEREUPON, the SCOPING MEETING concluded
6 at 6:31 p.m.)

CERTIFICATE

I, Myriam Joho Papadopoulos, do hereby certify that I reported all proceedings adduced in the foregoing matter and that the foregoing transcript pages constitutes a full, true and accurate record of said proceedings to the best of my ability.

I further certify that I am neither related to counsel or any party to the proceedings nor have any interest in the outcome of the proceedings.

IN WITNESS HEREOF, I have hereunto set my hand this 30th of January, 2025.

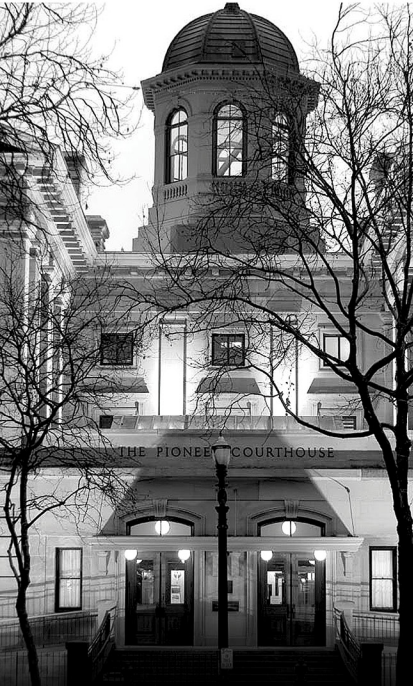
A handwritten signature in dark ink, appearing to read 'Myriam', is centered on the page. The signature is fluid and cursive, with a large initial 'M' and a trailing flourish.

Myriam Joho Papadopoulos, #2357

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SAVANNA ARMY DEPOT ACTIVITY ENVIRONMENTAL IMPACT STATEMENT

TRANSCRIPT OF SCOPING MEETING

HELD VIA ZOOM ON
THURSDAY, JANUARY 16, 2025
5:22 P.M.

HELD AT
WEST CARROLL HIGH SCHOOL AUDITORIUM
500 CRAGMOOR STREET
SAVANNA, ILLINOIS 61074

REMOTE APPEARANCES

Rowan McConville

Sara Renkes

Julie Bickelhaupt

Erika Schau

Elizabeth Grissinger

Ronald H. Smith

Mark Nilson, Naegeli Technician

TRANSCRIPT OF
SCOPING MEETING
HELD VIA ZOOM ON
THURSDAY, JANUARY 16, 2025
5:22 P.M.

ROWAN MCCONVILLE: So we'll just ask you to state your name beforehand and spell it out for us.

SARA RENKES: Okay.

ROWAN MCCONVILLE: And, Myriam, are you ready?

THE REPORTER: I am sorry. I didn't hear you. I'm ready.

ROWAN MCCONVILLE: We've got someone ready to make a comment. Are you ready?

THE REPORTER: I am ready. Please go ahead.

Please state your full name and spell it.

SARA RENKES: Okay. My name is Sara Renkes, S-A-R-A, R-E-N-K-E-S. So the last name is R-E-N-K-E-S. Yes.

THE REPORTER: Thank you.

SARA RENKES: Yeah.

ROWAN MCCONVILLE: There's a chair if

1 you'd like to sit. Sorry.

2 SARA RENKES: No, you're good.

3 I just wanted to state my support for the
4 LRA's Economic Development Plan, and would like to
5 have the Army support in helping them facilitate
6 that plan. The second comment I would like to make
7 is if any extra funding could be obtained for the
8 infrastructure to that area. And I think that's --
9 that's all I have.

10 ROWAN MCCONVILLE: Thank you so much.

11 SARA RENKES: Thank you very much. Yes.

12 ROWAN MCCONVILLE: I appreciate it.

13 (WHEREUPON, a discussion was held off the
14 record.)

15 ROWAN MCCONVILLE: Okay. So we have our
16 court reporter here, remotely.

17 JULIE BICKELHAUPT: Okay.

18 ROWAN MCCONVILLE: And we'll just ask you
19 to state your full name first, spell it out, and
20 then give us your comment. And then I'm also
21 recording just in case you know any --

22 JULIE BICKELHAUPT: Yes, technical
23 difficulties.

24 ROWAN MCCONVILLE: -- technical
25 difficulty. So --

1 JULIE BICKELHAUPT: All right. I am Julie
2 Bickelhaupt. J-U-L-I-E. B as in boy, I-C-K-E-L-H-
3 A-U, P as in Paul, T as in Thomas. I am from Mount
4 Carroll. I am the county board chair.

5 I think the biggest thing I'm seeing from
6 being here, talking with the LRA and the -- the Port
7 Authority is, I would like to see some economic
8 growth for the area as well, you know, for the towns
9 that surround it, but also for the county or
10 counties potentially. That would be a very good
11 thing for our area. And that space, it would be
12 wonderful if we could use it for something that
13 could create economic growth

14 So that's pretty much what I feel, and I
15 would like to see the most out of it. I'm sure
16 there's some other options that could come along
17 with it, but, you know, see that it benefits and
18 provides stability through the area.

19 ROWAN MCCONVILLE: Okay. Great. Thank
20 you so much.

21 JULIE BICKELHAUPT: All right. Thank you.

22 ROWAN MCCONVILLE: Have a good evening.

23 JULIE BICKELHAUPT: You too.

24 (WHEREUPON, a discussion was held off the
25 record.)

1 ROWAN MCCONVILLE: Okay. So what we will
2 ask you to do is we'll just have you state your full
3 name and then spell it out for us.

4 ERIKA SCHAU: Okay.

5 ROWAN MCCONVILLE: And then you can let a
6 read.

7 ERIKA SCHAU: Okay.

8 ROWAN MCCONVILLE: And I'll also be
9 recording just in case we have any technical --

10 ERIKA SCHAU: Sure.

11 ROWAN MCCONVILLE: -- difficulties. So
12 you're free to go.

13 ERIKA SCHAU: Okay. My name is Erika
14 Schau, E-R-I-C-A, S-C-H-A-U.

15 And my first concern is the condition of
16 Army Depot Road itself. Right now there is a lot of
17 traffic with the grain bins back there. So, you
18 know, spring, fall, all throughout the year, every
19 day there's lots of trucks and that road is
20 horrendous. And the patchwork just does not -- it
21 does not work. It doesn't last. It may last a
22 month or two and then it just crumbles.

23 My second is, with the -- all the dredging
24 that would go on with putting barges back there, the
25 environmental impact and the impact that it has.

024a

024b

024b

1 There's -- there's several people that live right
2 along the Mississippi River, like in the backwaters
3 right back there. So there's a -- I mean it's
4 really -- it's just so quiet and peaceful and I
5 think it would be detrimental to our environment. I
6 think that's all comments I had.

7 ROWAN MCCONVILLE: Okay. Great. Thank
8 you so much for your comment.

9 ERIKA SCHAU: You bet.

10 ROWAN MCCONVILLE: Great. Have a great
11 evening.

12 ERIKA SCHAU: Thanks. You too.

13 ROWAN MCCONVILLE: Thank you so much for
14 coming out.

15 ERIKA SCHAU: Yeah.

16 ROWAN MCCONVILLE: All good?

17 THE REPORTER: Excellent job you're doing.
18 (WHEREUPON, a discussion was held off the
19 record.)

20 ROWAN MCCONVILLE: If you just have a seat
21 and give us your full name.

22 ELIZABETH GRISSINGER: Okay.

23 ROWAN MCCONVILLE: And spell it for us and
24 then you can let a read.

25 ELIZABETH GRISSINGER: It's not bad. It's

--

ROWAN MCCONVILLE: No, no. Just --

ELIZABETH GRISSINGER: Okay.

ROWAN MCCONVILLE: -- we're ready for you.

ELIZABETH GRISSINGER: Okay.

ROWAN MCCONVILLE: Mm-hmm.

ELIZABETH GRISSINGER: Elizabeth
Grissinger.

ROWAN MCCONVILLE: Mm-hmm. Spell it.
Yes, ma'am.

ELIZABETH GRISSINGER: E-L-I-Z-A-B-E-T-H,
G-R-I-S-S-I-N-G-E-R.

And my comment is with all the flooding
that has happened all of these many, many years with
Apple River and of course the Mississippi overflows
and then Apple River overflows. But I see potential
where the Commander's Lake could be dredged out
deeper.

And that would allow for overflow, which
in turn would help the residents along the Army
Depot Road that currently own property, the farmer,
and the other resident that lives there, possibly
would have less flooding in the future.

ROWAN MCCONVILLE: Okay. Great. Thank
you so much for your comment. Thank you for coming

1 out this evening.

2 Are we all good over there?

3 THE REPORTER: Yes. Perfect. Thank you.

4 ROWAN MCCONVILLE: Good deal. Okay.

5 Let me go see if I can bring anybody else
6 in.

7 THE REPORTER: Mm-hmm.

8 (WHEREUPON, a discussion was held off the
9 record.)

10 ROWAN MCCONVILLE: Have a seat. So you'll
11 just tell us what you think. So what we'll have you
12 do is you'll tell us your full name and then you'll
13 spell it out for us and then you'll give us your
14 comment.

15 RONALD H. SMITH: Okay.

16 ROWAN MCCONVILLE: Right. We're ready for
17 you.

18 RONALD H. SMITH: Okay. My name's Ronald.
19 My middle initial is H. Smith. I live in Jo Daviess
20 County, Galena, Illinois. I'm on the LRA Board.
21 I've been on it for many years, and so I've been
22 involved in a lot of projects down there like this
23 one here now.

24 And I'm definitely in favor. I'm glad now
25 that we're looking at these parcels and being able

1 to get those and develop them. We did a study on
2 that parcel 20, this is the -- back in June of 2023.
3 And it spells out here by each area what it has and
4 everything.

5 And it all turned out real positive
6 release because years ago, you know, we used to have
7 the riverfront and then we didn't -- we didn't get
8 that or we lost that because they were going to
9 build a prison there. So fish and wildlife had land
10 internally, so they -- we had a trade and they took
11 over the riverfront.

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15 But definitely we got a good board and the people
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19 that.

20 Because when you can ship grain by bulk
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22 by some of the trucks. I never knew that before.
23 Yeah. So really that's all I have to say. We got a
24 good organization. It's good people working. Now
25 with the Port Authority working with us too, that's

1 good that that's going forward.

2 ROWAN MCCONVILLE: Right.

3 RONALD H. SMITH: They got a lot of power,
4 access to money, and do things and take over things.

5 ROWAN MCCONVILLE: Yes, sir.

6 RONALD H. SMITH: Okay. Thank you for
7 doing what you're doing.

8 ROWAN MCCONVILLE: Thank you so much for
9 your comment and thank you for coming this evening.

10 (WHEREUPON, a discussion was held off the
11 record.)

12 ROWAN MCCONVILLE: Doing last call now,
13 but should be wrapping up.

14 THE REPORTER: No problem.

15 Thank you.

16 (WHEREUPON, a discussion was held off the
17 record.)

18 ROWAN MCCONVILLE: All right. Well we're
19 going to call it an evening. Thank you so much for
20 your help.

21 THE REPORTER: Of course.

22 You're welcome.

23 Thank you as well.

24 Have a great evening now.

25 ROWAN MCCONVILLE: You too.

1 Bye.

2 THE REPORTER: Thanks.

3 Bye, Rowan.

4 Take care.

5 (WHEREUPON, the SCOPING MEETING concluded
6 at 6:31 p.m.)

CERTIFICATE

I, Myriam Joho Papadopoulos, do hereby certify that I reported all proceedings adduced in the foregoing matter and that the foregoing transcript pages constitutes a full, true and accurate record of said proceedings to the best of my ability.

I further certify that I am neither related to counsel or any party to the proceedings nor have any interest in the outcome of the proceedings.

IN WITNESS HEREOF, I have hereunto set my hand this 30th of January, 2025.

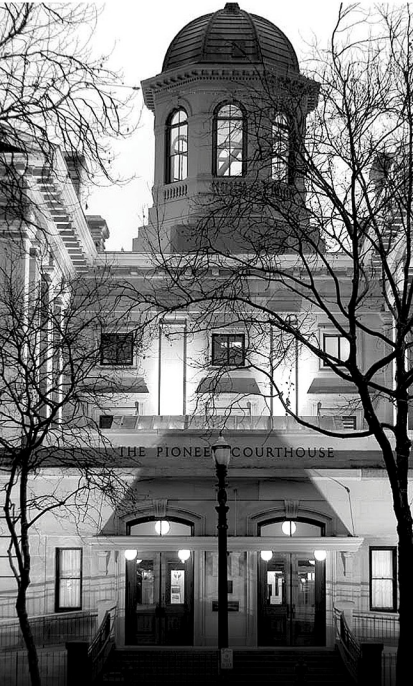
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Myriam Joho Papadopoulos, #2357

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<p>good 4:2 5:10,22 7:16 9:2,4 10:15, 24 11:1</p> <p>grain 6:17 10:20</p> <p>great 5:19 7:7,10 8:24 11:24</p> <p>Grissinger 7:22, 25 8:3,5,7,8,11</p> <p>growth 5:8,13</p> <hr/> <p>H</p> <hr/> <p>happened 8:14</p> <p>hear 3:13</p> <p>held 3:3 4:13 5:24 7:18 9:8 11:10,16</p> <p>helping 4:5</p> <p>horrendous 6:20</p> <hr/> <p>I</p> <hr/> <p>I-C-K-E-L-H- 5:2</p> <p>Illinois 9:20</p> <p>impact 6:25</p> <p>infrastructure 4:8</p> <p>initial 9:19</p> <p>internally 10:10</p> <p>involved 9:22</p> <hr/> <p>J</p> <hr/> <p>J-U-L-I-E 5:2</p> <p>JANUARY 3:4</p> <p>Jo 9:19</p> <p>job 7:17</p>	<p>Julie 4:17,22 5:1, 21,23</p> <p>June 10:2</p> <hr/> <p>K</p> <hr/> <p>knew 10:22</p> <hr/> <p>L</p> <hr/> <p>Lake 8:17</p> <p>land 10:9</p> <p>live 7:1 9:19</p> <p>lives 8:22</p> <p>lost 10:8</p> <p>lot 6:16 9:22 11:3</p> <p>lots 6:19</p> <p>LRA 5:6 9:20 10:12</p> <p>LRA's 4:4</p> <hr/> <p>M</p> <hr/> <p>make 3:16 4:6</p> <p>MCCONVILLE 3:7,11,15,25 4:10,12,15,18,24 5:19,22 6:1,5,8, 11 7:7,10,13,16, 20,23 8:2,4,6,9, 24 9:4,10,16 11:2,5,8,12,18,25</p> <p>MEETING 3:2 12:5</p> <p>middle 9:19</p> <p>Mississippi 7:2 8:15</p>	<p>Mm-hmm 8:6,9 9:7</p> <p>money 11:4</p> <p>month 6:22</p> <p>Mount 5:3</p> <p>Myriam 3:11</p> <hr/> <p>N</p> <hr/> <p>name's 9:18</p> <hr/> <p>O</p> <hr/> <p>obtained 4:7</p> <p>opportunity 10:17</p> <p>options 5:16</p> <p>organization 10:24</p> <p>overflow 8:19</p> <p>overflows 8:15, 16</p> <hr/> <p>P</p> <hr/> <p>p.m. 3:5 12:6</p> <p>parcel 10:2</p> <p>parcels 9:25</p> <p>patchwork 6:20</p> <p>Paul 5:3</p> <p>peaceful 7:4</p> <p>people 7:1 10:15, 24</p> <p>Perfect 9:3</p> <p>plan 4:4,6</p>	<p>Port 5:6 10:25</p> <p>positive 10:5</p> <p>possibly 8:22</p> <p>potential 8:16</p> <p>potentially 5:10</p> <p>power 11:3</p> <p>pretty 5:14</p> <p>prison 10:9,13</p> <p>problem 11:14</p> <p>projects 9:22</p> <p>property 8:21 10:12</p> <p>putting 6:24</p> <hr/> <p>Q</p> <hr/> <p>quiet 7:4</p> <hr/> <p>R</p> <hr/> <p>R-E-N-K-E-S 3:21,22</p> <p>railroad 10:17</p> <p>read 6:6 7:24</p> <p>ready 3:12,14,15, 16,17 8:4 9:16</p> <p>real 10:5</p> <p>record 4:14 5:25 7:19 9:9 11:11,17</p> <p>recording 4:21 6:9</p> <p>release 10:6</p> <p>remotely 4:16</p> <p>Renkes 3:10,20, 21,24 4:2,11</p>
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<p>reporter 3:13,17, 23 4:16 7:17 9:3, 7 11:14,21 12:2</p> <p>resident 8:22</p> <p>residents 8:20</p> <p>River 7:2 8:15,16</p> <p>riverfront 10:7,11</p> <p>road 6:16,19 8:21</p> <p>Ronald 9:15,18 11:3,6</p> <p>Rowan 3:7,11,15, 25 4:10,12,15,18, 24 5:19,22 6:1,5, 8,11 7:7,10,13, 16,20,23 8:2,4,6, 9,24 9:4,10,16 11:2,5,8,12,18,25 12:3</p> <hr/> <p>S</p> <hr/> <p>S-A-R-A 3:21</p> <p>S-C-H-A-U 6:14</p> <p>Sara 3:10,20,24 4:2,11</p> <p>Schau 6:4,7,10, 13,14 7:9,12,15</p> <p>SCOPING 3:2 12:5</p> <p>seat 7:20 9:10</p> <p>ship 10:20</p> <p>sir 11:5</p> <p>sit 4:1</p> <p>Smith 9:15,18,19 11:3,6</p> <p>space 5:11</p>	<p>spell 3:8,19 4:19 6:3 7:23 8:9 9:13</p> <p>spells 10:3</p> <p>spring 6:18</p> <p>stability 5:18</p> <p>state 3:8,19 4:3, 19 6:2</p> <p>study 10:1</p> <p>support 4:3,5</p> <p>supposed 10:13</p> <p>surround 5:9</p> <hr/> <p>T</p> <hr/> <p>talking 5:6</p> <p>technical 4:22,24 6:9</p> <p>thing 5:5,11</p> <p>things 10:16 11:4</p> <p>Thomas 5:3</p> <p>THURSDAY 3:4</p> <p>towns 5:8</p> <p>trade 10:10</p> <p>traffic 6:17</p> <p>TRANSCRIPT 3:1</p> <p>trucks 6:19 10:22</p> <p>turn 8:20</p> <p>turned 10:5</p> <hr/> <p>W</p> <hr/> <p>wanted 4:3</p> <p>water 10:18</p> <p>wildlife 10:9</p>	<p>wonderful 5:12</p> <p>work 6:21</p> <p>working 10:16, 24,25</p> <p>wrapping 11:13</p> <hr/> <p>Y</p> <hr/> <p>year 6:18</p> <p>years 8:14 9:21 10:6</p> <hr/> <p>Z</p> <hr/> <p>ZOOM 3:3</p>	
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SAVANNA ARMY DEPOT ACTIVITY ENVIRONMENTAL IMPACT STATEMENT

TRANSCRIPT OF SCOPING MEETING

HELD VIA ZOOM ON
THURSDAY, JANUARY 16, 2025
5:22 P.M.

HELD AT
WEST CARROLL HIGH SCHOOL AUDITORIUM
500 CRAGMOOR STREET
SAVANNA, ILLINOIS 61074

REMOTE APPEARANCES

Rowan McConville

Sara Renkes

Julie Bickelhaupt

Erika Schau

Elizabeth Grissinger

Ronald H. Smith

Mark Nilson, Naegeli Technician

TRANSCRIPT OF
SCOPING MEETING
HELD VIA ZOOM ON
THURSDAY, JANUARY 16, 2025
5:22 P.M.

ROWAN MCCONVILLE: So we'll just ask you to state your name beforehand and spell it out for us.

SARA RENKES: Okay.

ROWAN MCCONVILLE: And, Myriam, are you ready?

THE REPORTER: I am sorry. I didn't hear you. I'm ready.

ROWAN MCCONVILLE: We've got someone ready to make a comment. Are you ready?

THE REPORTER: I am ready. Please go ahead.

Please state your full name and spell it.

SARA RENKES: Okay. My name is Sara Renkes, S-A-R-A, R-E-N-K-E-S. So the last name is R-E-N-K-E-S. Yes.

THE REPORTER: Thank you.

SARA RENKES: Yeah.

ROWAN MCCONVILLE: There's a chair if

1 you'd like to sit. Sorry.

2 SARA RENKES: No, you're good.

3 I just wanted to state my support for the
4 LRA's Economic Development Plan, and would like to
5 have the Army support in helping them facilitate
6 that plan. The second comment I would like to make
7 is if any extra funding could be obtained for the
8 infrastructure to that area. And I think that's --
9 that's all I have.

10 ROWAN MCCONVILLE: Thank you so much.

11 SARA RENKES: Thank you very much. Yes.

12 ROWAN MCCONVILLE: I appreciate it.

13 (WHEREUPON, a discussion was held off the
14 record.)

15 ROWAN MCCONVILLE: Okay. So we have our
16 court reporter here, remotely.

17 JULIE BICKELHAUPT: Okay.

18 ROWAN MCCONVILLE: And we'll just ask you
19 to state your full name first, spell it out, and
20 then give us your comment. And then I'm also
21 recording just in case you know any --

22 JULIE BICKELHAUPT: Yes, technical
23 difficulties.

24 ROWAN MCCONVILLE: -- technical
25 difficulty. So --

1 JULIE BICKELHAUPT: All right. I am Julie
2 Bickelhaupt. J-U-L-I-E. B as in boy, I-C-K-E-L-H-
3 A-U, P as in Paul, T as in Thomas. I am from Mount
4 Carroll. I am the county board chair.

5 I think the biggest thing I'm seeing from
6 being here, talking with the LRA and the -- the Port
7 Authority is, I would like to see some economic
8 growth for the area as well, you know, for the towns
9 that surround it, but also for the county or
10 counties potentially. That would be a very good
11 thing for our area. And that space, it would be
12 wonderful if we could use it for something that
13 could create economic growth

14 So that's pretty much what I feel, and I
15 would like to see the most out of it. I'm sure
16 there's some other options that could come along
17 with it, but, you know, see that it benefits and
18 provides stability through the area.

19 ROWAN MCCONVILLE: Okay. Great. Thank
20 you so much.

21 JULIE BICKELHAUPT: All right. Thank you.

22 ROWAN MCCONVILLE: Have a good evening.

23 JULIE BICKELHAUPT: You too.

24 (WHEREUPON, a discussion was held off the
25 record.)

1 ROWAN MCCONVILLE: Okay. So what we will
2 ask you to do is we'll just have you state your full
3 name and then spell it out for us.

4 ERIKA SCHAU: Okay.

5 ROWAN MCCONVILLE: And then you can let a
6 read.

7 ERIKA SCHAU: Okay.

8 ROWAN MCCONVILLE: And I'll also be
9 recording just in case we have any technical --

10 ERIKA SCHAU: Sure.

11 ROWAN MCCONVILLE: -- difficulties. So
12 you're free to go.

13 ERIKA SCHAU: Okay. My name is Erika
14 Schau, E-R-I-C-A, S-C-H-A-U.

15 And my first concern is the condition of
16 Army Depot Road itself. Right now there is a lot of
17 traffic with the grain bins back there. So, you
18 know, spring, fall, all throughout the year, every
19 day there's lots of trucks and that road is
20 horrendous. And the patchwork just does not -- it
21 does not work. It doesn't last. It may last a
22 month or two and then it just crumbles.

23 My second is, with the -- all the dredging
24 that would go on with putting barges back there, the
25 environmental impact and the impact that it has.

1 There's -- there's several people that live right
2 along the Mississippi River, like in the backwaters
3 right back there. So there's a -- I mean it's
4 really -- it's just so quiet and peaceful and I
5 think it would be detrimental to our environment. I
6 think that's all comments I had.

7 ROWAN MCCONVILLE: Okay. Great. Thank
8 you so much for your comment.

9 ERIKA SCHAU: You bet.

10 ROWAN MCCONVILLE: Great. Have a great
11 evening.

12 ERIKA SCHAU: Thanks. You too.

13 ROWAN MCCONVILLE: Thank you so much for
14 coming out.

15 ERIKA SCHAU: Yeah.

16 ROWAN MCCONVILLE: All good?

17 THE REPORTER: Excellent job you're doing.
18 (WHEREUPON, a discussion was held off the
19 record.)

20 ROWAN MCCONVILLE: If you just have a seat
21 and give us your full name.

22 ELIZABETH GRISSINGER: Okay.

23 ROWAN MCCONVILLE: And spell it for us and
24 then you can let a read.

25 ELIZABETH GRISSINGER: It's not bad. It's

--

ROWAN MCCONVILLE: No, no. Just --

ELIZABETH GRISSINGER: Okay.

ROWAN MCCONVILLE: -- we're ready for you.

ELIZABETH GRISSINGER: Okay.

ROWAN MCCONVILLE: Mm-hmm.

ELIZABETH GRISSINGER: Elizabeth
Grissinger.

ROWAN MCCONVILLE: Mm-hmm. Spell it.
Yes, ma'am.

ELIZABETH GRISSINGER: E-L-I-Z-A-B-E-T-H,
G-R-I-S-S-I-N-G-E-R.

And my comment is with all the flooding
that has happened all of these many, many years with
Apple River and of course the Mississippi overflows
and then Apple River overflows. But I see potential
where the Commander's Lake could be dredged out
deeper.

And that would allow for overflow, which
in turn would help the residents along the Army
Depot Road that currently own property, the farmer,
and the other resident that lives there, possibly
would have less flooding in the future.

ROWAN MCCONVILLE: Okay. Great. Thank
you so much for your comment. Thank you for coming

025a

1 out this evening.

2 Are we all good over there?

3 THE REPORTER: Yes. Perfect. Thank you.

4 ROWAN MCCONVILLE: Good deal. Okay.

5 Let me go see if I can bring anybody else
6 in.

7 THE REPORTER: Mm-hmm.

8 (WHEREUPON, a discussion was held off the
9 record.)

10 ROWAN MCCONVILLE: Have a seat. So you'll
11 just tell us what you think. So what we'll have you
12 do is you'll tell us your full name and then you'll
13 spell it out for us and then you'll give us your
14 comment.

15 RONALD H. SMITH: Okay.

16 ROWAN MCCONVILLE: Right. We're ready for
17 you.

18 RONALD H. SMITH: Okay. My name's Ronald.
19 My middle initial is H. Smith. I live in Jo Daviess
20 County, Galena, Illinois. I'm on the LRA Board.
21 I've been on it for many years, and so I've been
22 involved in a lot of projects down there like this
23 one here now.

24 And I'm definitely in favor. I'm glad now
25 that we're looking at these parcels and being able

1 to get those and develop them. We did a study on
2 that parcel 20, this is the -- back in June of 2023.
3 And it spells out here by each area what it has and
4 everything.

5 And it all turned out real positive
6 release because years ago, you know, we used to have
7 the riverfront and then we didn't -- we didn't get
8 that or we lost that because they were going to
9 build a prison there. So fish and wildlife had land
10 internally, so they -- we had a trade and they took
11 over the riverfront.

12 And then the LRA got that property there
13 and that's where the prison was supposed to go, but
14 then it got built down -- down below. I think so.
15 But definitely we got a good board and the people
16 working on some of these things that were economic
17 development and with the opportunity at the railroad
18 and the water there yet, you got to get access to
19 that.

20 Because when you can ship grain by bulk
21 barges, it's more -- well, they say it's edible than
22 by some of the trucks. I never knew that before.
23 Yeah. So really that's all I have to say. We got a
24 good organization. It's good people working. Now
25 with the Port Authority working with us too, that's

1 good that that's going forward.

2 ROWAN MCCONVILLE: Right.

3 RONALD H. SMITH: They got a lot of power,
4 access to money, and do things and take over things.

5 ROWAN MCCONVILLE: Yes, sir.

6 RONALD H. SMITH: Okay. Thank you for
7 doing what you're doing.

8 ROWAN MCCONVILLE: Thank you so much for
9 your comment and thank you for coming this evening.

10 (WHEREUPON, a discussion was held off the
11 record.)

12 ROWAN MCCONVILLE: Doing last call now,
13 but should be wrapping up.

14 THE REPORTER: No problem.

15 Thank you.

16 (WHEREUPON, a discussion was held off the
17 record.)

18 ROWAN MCCONVILLE: All right. Well we're
19 going to call it an evening. Thank you so much for
20 your help.

21 THE REPORTER: Of course.

22 You're welcome.

23 Thank you as well.

24 Have a great evening now.

25 ROWAN MCCONVILLE: You too.

1 Bye.

2 THE REPORTER: Thanks.

3 Bye, Rowan.

4 Take care.

5 (WHEREUPON, the SCOPING MEETING concluded
6 at 6:31 p.m.)

CERTIFICATE

I, Myriam Joho Papadopoulos, do hereby certify that I reported all proceedings adduced in the foregoing matter and that the foregoing transcript pages constitutes a full, true and accurate record of said proceedings to the best of my ability.

I further certify that I am neither related to counsel or any party to the proceedings nor have any interest in the outcome of the proceedings.

IN WITNESS HEREOF, I have hereunto set my hand this 30th of January, 2025.

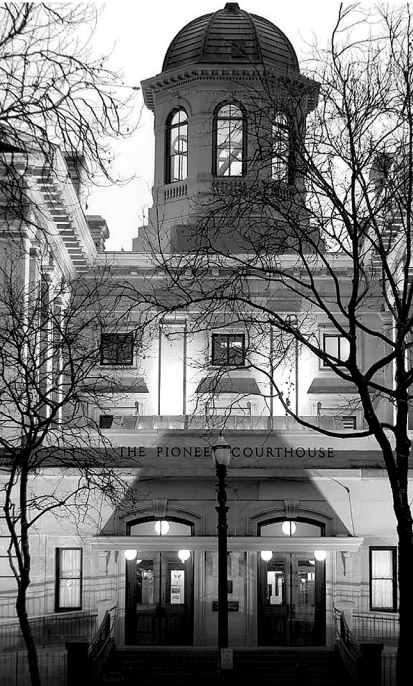
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Myriam Joho Papadopoulos, #2357

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SAVANNA ARMY DEPOT ACTIVITY ENVIRONMENTAL IMPACT STATEMENT

TRANSCRIPT OF SCOPING MEETING

HELD VIA ZOOM ON
THURSDAY, JANUARY 16, 2025
5:22 P.M.

HELD AT
WEST CARROLL HIGH SCHOOL AUDITORIUM
500 CRAGMOOR STREET
SAVANNA, ILLINOIS 61074

REMOTE APPEARANCES

Rowan McConville

Sara Renkes

Julie Bickelhaupt

Erika Schau

Elizabeth Grissinger

Ronald H. Smith

Mark Nilson, Naegeli Technician

TRANSCRIPT OF
SCOPING MEETING
HELD VIA ZOOM ON
THURSDAY, JANUARY 16, 2025
5:22 P.M.

ROWAN MCCONVILLE: So we'll just ask you to state your name beforehand and spell it out for us.

SARA RENKES: Okay.

ROWAN MCCONVILLE: And, Myriam, are you ready?

THE REPORTER: I am sorry. I didn't hear you. I'm ready.

ROWAN MCCONVILLE: We've got someone ready to make a comment. Are you ready?

THE REPORTER: I am ready. Please go ahead.

Please state your full name and spell it.

SARA RENKES: Okay. My name is Sara Renkes, S-A-R-A, R-E-N-K-E-S. So the last name is R-E-N-K-E-S. Yes.

THE REPORTER: Thank you.

SARA RENKES: Yeah.

ROWAN MCCONVILLE: There's a chair if

1 you'd like to sit. Sorry.

2 SARA RENKES: No, you're good.

3 I just wanted to state my support for the
4 LRA's Economic Development Plan, and would like to
5 have the Army support in helping them facilitate
6 that plan. The second comment I would like to make
7 is if any extra funding could be obtained for the
8 infrastructure to that area. And I think that's --
9 that's all I have.

10 ROWAN MCCONVILLE: Thank you so much.

11 SARA RENKES: Thank you very much. Yes.

12 ROWAN MCCONVILLE: I appreciate it.

13 (WHEREUPON, a discussion was held off the
14 record.)

15 ROWAN MCCONVILLE: Okay. So we have our
16 court reporter here, remotely.

17 JULIE BICKELHAUPT: Okay.

18 ROWAN MCCONVILLE: And we'll just ask you
19 to state your full name first, spell it out, and
20 then give us your comment. And then I'm also
21 recording just in case you know any --

22 JULIE BICKELHAUPT: Yes, technical
23 difficulties.

24 ROWAN MCCONVILLE: -- technical
25 difficulty. So --

1 JULIE BICKELHAUPT: All right. I am Julie
2 Bickelhaupt. J-U-L-I-E. B as in boy, I-C-K-E-L-H-
3 A-U, P as in Paul, T as in Thomas. I am from Mount
4 Carroll. I am the county board chair.

5 I think the biggest thing I'm seeing from
6 being here, talking with the LRA and the -- the Port
7 Authority is, I would like to see some economic
8 growth for the area as well, you know, for the towns
9 that surround it, but also for the county or
10 counties potentially. That would be a very good
11 thing for our area. And that space, it would be
12 wonderful if we could use it for something that
13 could create economic growth

14 So that's pretty much what I feel, and I
15 would like to see the most out of it. I'm sure
16 there's some other options that could come along
17 with it, but, you know, see that it benefits and
18 provides stability through the area.

19 ROWAN MCCONVILLE: Okay. Great. Thank
20 you so much.

21 JULIE BICKELHAUPT: All right. Thank you.

22 ROWAN MCCONVILLE: Have a good evening.

23 JULIE BICKELHAUPT: You too.

24 (WHEREUPON, a discussion was held off the
25 record.)

1 ROWAN MCCONVILLE: Okay. So what we will
2 ask you to do is we'll just have you state your full
3 name and then spell it out for us.

4 ERIKA SCHAU: Okay.

5 ROWAN MCCONVILLE: And then you can let a
6 read.

7 ERIKA SCHAU: Okay.

8 ROWAN MCCONVILLE: And I'll also be
9 recording just in case we have any technical --

10 ERIKA SCHAU: Sure.

11 ROWAN MCCONVILLE: -- difficulties. So
12 you're free to go.

13 ERIKA SCHAU: Okay. My name is Erika
14 Schau, E-R-I-C-A, S-C-H-A-U.

15 And my first concern is the condition of
16 Army Depot Road itself. Right now there is a lot of
17 traffic with the grain bins back there. So, you
18 know, spring, fall, all throughout the year, every
19 day there's lots of trucks and that road is
20 horrendous. And the patchwork just does not -- it
21 does not work. It doesn't last. It may last a
22 month or two and then it just crumbles.

23 My second is, with the -- all the dredging
24 that would go on with putting barges back there, the
25 environmental impact and the impact that it has.

1 There's -- there's several people that live right
2 along the Mississippi River, like in the backwaters
3 right back there. So there's a -- I mean it's
4 really -- it's just so quiet and peaceful and I
5 think it would be detrimental to our environment. I
6 think that's all comments I had.

7 ROWAN MCCONVILLE: Okay. Great. Thank
8 you so much for your comment.

9 ERIKA SCHAU: You bet.

10 ROWAN MCCONVILLE: Great. Have a great
11 evening.

12 ERIKA SCHAU: Thanks. You too.

13 ROWAN MCCONVILLE: Thank you so much for
14 coming out.

15 ERIKA SCHAU: Yeah.

16 ROWAN MCCONVILLE: All good?

17 THE REPORTER: Excellent job you're doing.
18 (WHEREUPON, a discussion was held off the
19 record.)

20 ROWAN MCCONVILLE: If you just have a seat
21 and give us your full name.

22 ELIZABETH GRISSINGER: Okay.

23 ROWAN MCCONVILLE: And spell it for us and
24 then you can let a read.

25 ELIZABETH GRISSINGER: It's not bad. It's

--

ROWAN MCCONVILLE: No, no. Just --

ELIZABETH GRISSINGER: Okay.

ROWAN MCCONVILLE: -- we're ready for you.

ELIZABETH GRISSINGER: Okay.

ROWAN MCCONVILLE: Mm-hmm.

ELIZABETH GRISSINGER: Elizabeth
Grissinger.

ROWAN MCCONVILLE: Mm-hmm. Spell it.
Yes, ma'am.

ELIZABETH GRISSINGER: E-L-I-Z-A-B-E-T-H,
G-R-I-S-S-I-N-G-E-R.

And my comment is with all the flooding
that has happened all of these many, many years with
Apple River and of course the Mississippi overflows
and then Apple River overflows. But I see potential
where the Commander's Lake could be dredged out
deeper.

And that would allow for overflow, which
in turn would help the residents along the Army
Depot Road that currently own property, the farmer,
and the other resident that lives there, possibly
would have less flooding in the future.

ROWAN MCCONVILLE: Okay. Great. Thank
you so much for your comment. Thank you for coming

1 out this evening.

2 Are we all good over there?

3 THE REPORTER: Yes. Perfect. Thank you.

4 ROWAN MCCONVILLE: Good deal. Okay.

5 Let me go see if I can bring anybody else
6 in.

7 THE REPORTER: Mm-hmm.

8 (WHEREUPON, a discussion was held off the
9 record.)

10 ROWAN MCCONVILLE: Have a seat. So you'll
11 just tell us what you think. So what we'll have you
12 do is you'll tell us your full name and then you'll
13 spell it out for us and then you'll give us your
14 comment.

15 RONALD H. SMITH: Okay.

16 ROWAN MCCONVILLE: Right. We're ready for
17 you.

18 RONALD H. SMITH: Okay. My name's Ronald.
19 My middle initial is H. Smith. I live in Jo Daviess
20 County, Galena, Illinois. I'm on the LRA Board.
21 I've been on it for many years, and so I've been
22 involved in a lot of projects down there like this
23 one here now.

24 And I'm definitely in favor. I'm glad now
25 that we're looking at these parcels and being able

026a

1 to get those and develop them. We did a study on
2 that parcel 20, this is the -- back in June of 2023.
3 And it spells out here by each area what it has and
4 everything.

5 And it all turned out real positive
6 release because years ago, you know, we used to have
7 the riverfront and then we didn't -- we didn't get
8 that or we lost that because they were going to
9 build a prison there. So fish and wildlife had land
10 internally, so they -- we had a trade and they took
11 over the riverfront.

12 And then the LRA got that property there
13 and that's where the prison was supposed to go, but
14 then it got built down -- down below. I think so.
15 But definitely we got a good board and the people
16 working on some of these things that were economic
17 development and with the opportunity at the railroad
18 and the water there yet, you got to get access to
19 that.

20 Because when you can ship grain by bulk
21 barges, it's more -- well, they say it's edible than
22 by some of the trucks. I never knew that before.
23 Yeah. So really that's all I have to say. We got a
24 good organization. It's good people working. Now
25 with the Port Authority working with us too, that's

026b

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1 good that that's going forward.

2 ROWAN MCCONVILLE: Right.

3 RONALD H. SMITH: They got a lot of power,
4 access to money, and do things and take over things.

5 ROWAN MCCONVILLE: Yes, sir.

6 RONALD H. SMITH: Okay. Thank you for
7 doing what you're doing.

8 ROWAN MCCONVILLE: Thank you so much for
9 your comment and thank you for coming this evening.

10 (WHEREUPON, a discussion was held off the
11 record.)

12 ROWAN MCCONVILLE: Doing last call now,
13 but should be wrapping up.

14 THE REPORTER: No problem.

15 Thank you.

16 (WHEREUPON, a discussion was held off the
17 record.)

18 ROWAN MCCONVILLE: All right. Well we're
19 going to call it an evening. Thank you so much for
20 your help.

21 THE REPORTER: Of course.

22 You're welcome.

23 Thank you as well.

24 Have a great evening now.

25 ROWAN MCCONVILLE: You too.

1 Bye.

2 THE REPORTER: Thanks.

3 Bye, Rowan.

4 Take care.

5 (WHEREUPON, the SCOPING MEETING concluded
6 at 6:31 p.m.)

CERTIFICATE

I, Myriam Joho Papadopoulos, do hereby certify that I reported all proceedings adduced in the foregoing matter and that the foregoing transcript pages constitutes a full, true and accurate record of said proceedings to the best of my ability.

I further certify that I am neither related to counsel or any party to the proceedings nor have any interest in the outcome of the proceedings.

IN WITNESS HEREOF, I have hereunto set my hand this 30th of January, 2025.

A handwritten signature in dark ink, appearing to read 'Myriam', is written over a faint, circular embossed seal. The signature is fluid and cursive.

Myriam Joho Papadopoulos, #2357

1	bad 7:25	counties 5:10	8:3,5,7,11
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<p>good 4:2 5:10,22 7:16 9:2,4 10:15, 24 11:1</p> <p>grain 6:17 10:20</p> <p>great 5:19 7:7,10 8:24 11:24</p> <p>Grissinger 7:22, 25 8:3,5,7,8,11</p> <p>growth 5:8,13</p> <hr/> <p>H</p> <hr/> <p>happened 8:14</p> <p>hear 3:13</p> <p>held 3:3 4:13 5:24 7:18 9:8 11:10,16</p> <p>helping 4:5</p> <p>horrendous 6:20</p> <hr/> <p>I</p> <hr/> <p>I-C-K-E-L-H- 5:2</p> <p>Illinois 9:20</p> <p>impact 6:25</p> <p>infrastructure 4:8</p> <p>initial 9:19</p> <p>internally 10:10</p> <p>involved 9:22</p> <hr/> <p>J</p> <hr/> <p>J-U-L-I-E 5:2</p> <p>JANUARY 3:4</p> <p>Jo 9:19</p> <p>job 7:17</p>	<p>Julie 4:17,22 5:1, 21,23</p> <p>June 10:2</p> <hr/> <p>K</p> <hr/> <p>knew 10:22</p> <hr/> <p>L</p> <hr/> <p>Lake 8:17</p> <p>land 10:9</p> <p>live 7:1 9:19</p> <p>lives 8:22</p> <p>lost 10:8</p> <p>lot 6:16 9:22 11:3</p> <p>lots 6:19</p> <p>LRA 5:6 9:20 10:12</p> <p>LRA's 4:4</p> <hr/> <p>M</p> <hr/> <p>make 3:16 4:6</p> <p>MCCONVILLE 3:7,11,15,25 4:10,12,15,18,24 5:19,22 6:1,5,8, 11 7:7,10,13,16, 20,23 8:2,4,6,9, 24 9:4,10,16 11:2,5,8,12,18,25</p> <p>MEETING 3:2 12:5</p> <p>middle 9:19</p> <p>Mississippi 7:2 8:15</p>	<p>Mm-hmm 8:6,9 9:7</p> <p>money 11:4</p> <p>month 6:22</p> <p>Mount 5:3</p> <p>Myriam 3:11</p> <hr/> <p>N</p> <hr/> <p>name's 9:18</p> <hr/> <p>O</p> <hr/> <p>obtained 4:7</p> <p>opportunity 10:17</p> <p>options 5:16</p> <p>organization 10:24</p> <p>overflow 8:19</p> <p>overflows 8:15, 16</p> <hr/> <p>P</p> <hr/> <p>p.m. 3:5 12:6</p> <p>parcel 10:2</p> <p>parcels 9:25</p> <p>patchwork 6:20</p> <p>Paul 5:3</p> <p>peaceful 7:4</p> <p>people 7:1 10:15, 24</p> <p>Perfect 9:3</p> <p>plan 4:4,6</p>	<p>Port 5:6 10:25</p> <p>positive 10:5</p> <p>possibly 8:22</p> <p>potential 8:16</p> <p>potentially 5:10</p> <p>power 11:3</p> <p>pretty 5:14</p> <p>prison 10:9,13</p> <p>problem 11:14</p> <p>projects 9:22</p> <p>property 8:21 10:12</p> <p>putting 6:24</p> <hr/> <p>Q</p> <hr/> <p>quiet 7:4</p> <hr/> <p>R</p> <hr/> <p>R-E-N-K-E-S 3:21,22</p> <p>railroad 10:17</p> <p>read 6:6 7:24</p> <p>ready 3:12,14,15, 16,17 8:4 9:16</p> <p>real 10:5</p> <p>record 4:14 5:25 7:19 9:9 11:11,17</p> <p>recording 4:21 6:9</p> <p>release 10:6</p> <p>remotely 4:16</p> <p>Renkes 3:10,20, 21,24 4:2,11</p>
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<p>reporter 3:13,17, 23 4:16 7:17 9:3, 7 11:14,21 12:2</p> <p>resident 8:22</p> <p>residents 8:20</p> <p>River 7:2 8:15,16</p> <p>riverfront 10:7,11</p> <p>road 6:16,19 8:21</p> <p>Ronald 9:15,18 11:3,6</p> <p>Rowan 3:7,11,15, 25 4:10,12,15,18, 24 5:19,22 6:1,5, 8,11 7:7,10,13, 16,20,23 8:2,4,6, 9,24 9:4,10,16 11:2,5,8,12,18,25 12:3</p> <hr/> <p>S</p> <hr/> <p>S-A-R-A 3:21</p> <p>S-C-H-A-U 6:14</p> <p>Sara 3:10,20,24 4:2,11</p> <p>Schau 6:4,7,10, 13,14 7:9,12,15</p> <p>SCOPING 3:2 12:5</p> <p>seat 7:20 9:10</p> <p>ship 10:20</p> <p>sir 11:5</p> <p>sit 4:1</p> <p>Smith 9:15,18,19 11:3,6</p> <p>space 5:11</p>	<p>spell 3:8,19 4:19 6:3 7:23 8:9 9:13</p> <p>spells 10:3</p> <p>spring 6:18</p> <p>stability 5:18</p> <p>state 3:8,19 4:3, 19 6:2</p> <p>study 10:1</p> <p>support 4:3,5</p> <p>supposed 10:13</p> <p>surround 5:9</p> <hr/> <p>T</p> <hr/> <p>talking 5:6</p> <p>technical 4:22,24 6:9</p> <p>thing 5:5,11</p> <p>things 10:16 11:4</p> <p>Thomas 5:3</p> <p>THURSDAY 3:4</p> <p>towns 5:8</p> <p>trade 10:10</p> <p>traffic 6:17</p> <p>TRANSCRIPT 3:1</p> <p>trucks 6:19 10:22</p> <p>turn 8:20</p> <p>turned 10:5</p> <hr/> <p>W</p> <hr/> <p>wanted 4:3</p> <p>water 10:18</p> <p>wildlife 10:9</p>	<p>wonderful 5:12</p> <p>work 6:21</p> <p>working 10:16, 24,25</p> <p>wrapping 11:13</p> <hr/> <p>Y</p> <hr/> <p>year 6:18</p> <p>years 8:14 9:21 10:6</p> <hr/> <p>Z</p> <hr/> <p>ZOOM 3:3</p>	
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Base Realignment and Closure Savanna Army Depot Activity
 LRA Parcel 20 Environmental Impact Statement
 CEQ Unique Identifier: EISX-007-21-000-1729699335

Public Scoping Comment Form

Scoping comments should be submitted by February 15, 2025

Comments can be submitted by email to: SVADAEIS@tetrattech.com	or By U.S. mail to: SVADA EIS c/o Tetra Tech 107 St. Francis Street, Suite 2370 Mobile, AL 36602
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Name: Julie Bickelhaupt
 Organization: Carroll County Board
 Address: [REDACTED] Mt Carroll IL
 Email: [REDACTED]

Affiliation (please check a box):

- | | |
|---|---|
| <input checked="" type="checkbox"/> Elected Official | <input type="checkbox"/> Business/commercial organization |
| <input checked="" type="checkbox"/> Local government | <input type="checkbox"/> Historic preservation organization |
| <input type="checkbox"/> State government | <input type="checkbox"/> Nongovernmental organization |
| <input type="checkbox"/> Federal government | <input type="checkbox"/> Private citizen |
| <input type="checkbox"/> Native American Tribe/organization | <input type="checkbox"/> Other: _____ |

Please check the box next to the topic area(s) that you have comments/concerns about and write your comment on the reverse.

- | | |
|--|--|
| <input type="checkbox"/> Aesthetics and visual resources | <input type="checkbox"/> NEPA |
| <input type="checkbox"/> Air quality/climate | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Biological resources | <input type="checkbox"/> Proposed action or alternatives |
| <input type="checkbox"/> Coordination/communication | <input type="checkbox"/> Socioeconomics |
| <input type="checkbox"/> Cultural and historic resources | <input type="checkbox"/> Traffic/transportation |
| <input type="checkbox"/> Cumulative effects | <input type="checkbox"/> Utilities and infrastructure |
| <input type="checkbox"/> Environmental justice/children | <input type="checkbox"/> Water resources |
| <input type="checkbox"/> Geology and soils | <input type="checkbox"/> General Support |
| <input type="checkbox"/> Hazardous materials and waste | <input type="checkbox"/> General Opposition |
| <input type="checkbox"/> Land use | <input type="checkbox"/> Other: <u>Economic Growth</u> |
| <input type="checkbox"/> Mitigation | |
| <input type="checkbox"/> Navigation | |

027a

Comments:This image shows a single sheet of white paper with horizontal blue or grey ruling lines. The lines are evenly spaced and run across the width of the page. There are no margins, text, or other markings on the paper.

For more information regarding this project visit:
<https://www.lrd.usace.army.mil/Submit-ArticleCS/Programs/Article/3901394/>

From: [Sara Renkes](#)
To: [SVADAEIS](#)
Subject: Savanna Army Depot Comment Submission
Date: Friday, January 17, 2025 10:43:18 AM
Attachments: [Army Depot Road Work.pdf](#)
[Army Depot Bridge Estimate.pdf](#)

Good Morning,

I attended the meeting last night in Savanna as a citizen of Carroll County, but due to the comment made during the open forum regarding the Army Depot Road, I wanted to respond in my role as Carroll County Engineer as well.

The County has jurisdiction of Army Depot Road from IL 84 to Main Avenue:

<https://maps.app.goo.gl/HyYVnTHvHDisuDCm7>

The current road condition is quickly deteriorating due to use and age.

The biggest issues are the limited width of the road and rutting that has occurred along the outside wheel tracks.

Our maintenance crew has been placing shoulder rock and cold patch to band-aid the problem while I have been simultaneously applying for federal funding.

We worked with Blackhawk Hills to receive a RISE Planning grant, which produced the following estimates for the road and bridge work: Please see the attached.

I also worked with Blackhawk Hills to apply for a RISE Implementation grant for the bridge. We are still waiting for confirmation if this grant has been accepted.

I wanted to write this comment to show that the Carroll County Highway Department is making efforts to upgrade this corridor and ask for any assistance that could be given for funding this project. Whether that is suggestions on funding opportunities, letters of support to attach to any applications, or assistance in writing applications, really anything would be greatly appreciated.

I appreciate the Army taking the time to have the open meeting and look forward to speaking and hopefully working with you in the future.

Sara Renkes
Carroll County Engineer

[REDACTED]
Mt. Carroll, IL. 61053
[REDACTED]

028a

028b

028c

Project Name: Army Depot Road FDR
County: Carroll

Expected Start Date: 11/1/28
Expected End Date: 4/1/29

[illegible]

NOTE: 1. THE GUARDRAIL FOR THE EAST APPROACH ADJACENT TO THE BRIDGE OVER APPLE RIVER COULD/MAY BE ADDED TO THE PROJECT FOR REMOVAL & REPLACEMENT, DUE TO DEFICIENT EXISTING GUARDRAIL.
2. IF CURRENT ROADWAY WITH OF 36' (24' ROADWAY W/ 6' AGGREGATE SHOULDERS ARE TO REMAIN IT WOULD REQUIRE EMBANKMENT TO EXTEND INTO WETLAND AREAS AS THE ROADWAY APPROACHES THE EAST SIDE OF THE BRIDGE OVER APPLE RIVER. TO MINIMIZE INTRUSION INTO THE WETLAND THE EMBANKMENT COULD BE REDUCED TO 1:2 AND ARMORED WITH RIP RAP WITH THE ADDITION OF GUARDRAIL.

Background Information:

Project Name: 008-3011 Army Depot Road Bridge

Project Description: Bearing and joint replacement with various steel repair.

Expected Start Date: 5/1/26

Expected End Date: 9/1/27

Estimated Funding: \$250,000

Pay Item Number	Item Description	Quantity	Unit	Unit Cost	Total
40600290	BITUMINOUS MATERIALS (TACK COAT)	24	SQ YD	\$ 50.00	\$ 1,200
40603080	HOT-MIX ASPHALT BINDER CSE IL-19.0, MIX C, N50	7	TON	\$ 1,200.00	\$ 8,400
40604050	HOT-MIX ASPHALT SURFACE CSE IL-9.5L, MIX C, N50	4	TON	\$ 1,600.00	\$ 6,400
44000100	PAVEMENT REMOVAL	30	SQ YD	\$ 70.00	\$ 2,100
50102400	CONCRETE REMOVAL	7	CU YD	\$ 2,000.00	\$ 14,000
50300225	CONCRETE STRUCTURES	3	CU YD	\$ 2,500.00	\$ 7,500
50300225	CONCRETE SUPERSTRUCTURES	4	CU YD	\$ 3,000.00	\$ 12,000
50500405	F&E STRUCTURAL STEEL	1200	LB	\$ 22.00	\$ 26,400
50606701	CLEANING & PAINTING STRUCTURAL STEEL, LOC. 1	1	L SUM	\$ 25,000.00	\$ 25,000
50800205	REINFORCEMENT BARS, EPOXY CTD	1400	LB	\$ 3.50	\$ 4,900
50800515	BAR SPLICERS	30	EACH	\$ 125.00	\$ 3,750
52000037	PREFORMED JOINT SEAL, 3"	66	FOOT	\$ 325.00	\$ 21,450
52100010	ELASTOMERIC BEARING ASSEMBLY, TY 1	8	EACH	\$ 3,250.00	\$ 26,000
52100520	ANCHOR BOLTS, 1"	16	EACH	\$ 225.00	\$ 3,600
63000003	STEEL PLATE BEAM GUARDRAIL, TYPE A, 9FT POSTS	250	FOOT	\$ 48.00	\$ 12,000
63100085	TRAFFIC BARRIER TERMINAL, TYPE 6	4	EACH	\$ 5,000.00	\$ 20,000
63100167	TRAFFIC BARRIER TERMINAL, TYPE 1 (SPL), TANGENT	4	EACH	\$ 5,000.00	\$ 20,000
67100100	MOBILIZATION	1	L SUM	\$ 35,000.00	\$ 35,000
70106500	TEMPORARY BRIDGE TRAFFIC SIGNALS	2	EACH	\$ 20,000.00	\$ 40,000
70300221	TEMPORARY PAVEMENT MARKING 4"	1200	FOOT	\$ 1.25	\$ 1,500
70400100	TEMPORARY CONCRETE BARRIER	600	FOOT	\$ 40.00	\$ 24,000
70400200	RELOCATE TEMPORARY CONCRETE BARRIER	600	FOOT	\$ 10.00	\$ 6,000
Z0001899	JACK AND REMOVE EXISTING BEARINGS	8	EACH	\$ 3,000.00	\$ 24,000
Z0001905	STRUCTURAL STEEL REPAIR	1800	LB	\$ 22.00	\$ 39,600
Z0007101	CONT. & DISPOSAL LEAD PAINT CLEANING RESIDUE	1	L SUM	\$ 25,000.00	\$ 25,000
Z0013798	CONSTRUCTION LAYOUT	1	L SUM	\$ 5,000.00	\$ 5,000
Z0051800	REPAIR CONCRETE STRUCTURES	60	SQ FT	\$ 500.00	\$ 30,000
<div> <div>Construction Total =</div> <div>Design Engineering =</div> <div>Construction Engineering =</div> <div>Contingency =</div> <div>Total Opinion of Probable Cost =</div> </div>					<div>\$ 444,800</div> <div>\$ 66,720.00</div> <div>\$ 44,480</div> <div>\$ 88,960</div> <div>\$ 644,960</div>

[REDACTED]
East Dubuque, IL 61025

February 10, 2025

SVADA EIS
c/o Tetra Tech
107 St Francis Street Suite 2370
Moline, AL 36602

ATTN: Thomas Lineer, BRAC Program Manager

RE: Transfer Approval

Dear Mr Lineer:

Thank you for the opportunity for the public and Jo Daviess County Board members to review and comment on the transfer of LRA Parcel 20's 132 acres*. In 2016 when the US Fish and Wildlife Service officially withdrew its interest in this parcel, there was great excitement that the local economy could be boosted with opportunities for use by residents and visitors. The LRA has been cognizant of environmental concerns while researching responsible and practical uses that will bring greater value and interest to Parcel 20.

029a

The reuse for commercial/economic development alternatives presented by LRA will answer the growing needs for our rural communities in Illinois. Although there is importance of recreation in attracting a workforce, it does not outweigh the need for job creation and improved economic growth outlook.

029b

The declining population of the area's workforce must be faced with assertive actions to improve job opportunities and reduced tax burdens. Local boards, councils and community groups are eager to see growth stimulated. I just hope this long wait is not going to be a "too late" scenario for those dedicated to improving our northwestern part of Illinois.

029c

Your approval of the transfer and reuse of Parcel 20 to the Jo-Carroll Depot Local Redevelopment Authority is requested.

029d

Regards,



Diane L Gallagher
Board member Northwest Illinois Economic Development
Board member Blackhawk Hills Regional Council
Board member Jo Daviess County Board District 1

- <https://www.lrd.usace.army.mil/Submit-ArticleCS/Programs/Article/3901394/base-realignment-and-closure-brac/>

From: [John Schultz](#)
To: [SVADAEIS](#)
Subject: LRA Parcel 20 EIS
Date: Sunday, February 9, 2025 6:31:39 PM

I have been a citizen of Jo Daviess County for 76 years. My father worked at the SAD in the 1940's before entering the army Air Force to fight in WW2. My w[fe worked as an engineer for USADACS during the 80s and 90s before the base closed . I have served in Township and County Government for much of the last 40 years. I am currently Finance, Tax and Budget Chair for the JoDaviess County Board.

030a

Since the closure of The Savanna Army Depot it has represented 13,000 acres of untapped resources for development and reuse. The release of LRA Parcel for development is a crucial small step of realizing some of that potential. It represents about 1% of the property. Any environmental impact created by the usage of this property pales in comparison to its possible positive impact on Carroll and JoDaviess Counties.

030b

Thank you for this opportunity to express my support for the release and reuse of LRA Parcel
20

030c

John A Schultz [REDACTED] Galena, Illinois 60136

From: [Susan Jacobs](#)
To: [SVADAEIS](#)
Subject: Parcel 20
Date: Wednesday, February 12, 2025 11:04:46 AM

My thoughts on Parcel 20 is thank you for bringing this forward for review. I'm hoping this gets resolved at the correct levels for moving forward on this for Carroll County. I believe there is enough interest in the County for the economic development of this land.

031a

Thank you,

Carroll County Board
Susan Jacobs

From: [REDACTED]
To: [SVADAEIS](#)
Cc: [Pat Sanchez](#); [Jeff Griswold](#); [Brittany Hatteberg](#); [Jeremy Hughes](#)
Subject: CEQ Identifier EISX-007-21-000-1729699335 (EIS Disposal and Reuse of LRA Parcel 20 Public Meeting January 16)
Date: Wednesday, February 12, 2025 12:11:57 PM

To: Thomas Lineer, BRAC Program Manager

I am the mayor of the City of Savanna, Illinois and I thank you and all those involved in the January 16 scoping meeting held at our local high school building on the subject of the LRA's proposal for Parcel 20 at the former Savanna Army Depot. The meeting, including the public comments, the conversations I had with officials involved in the EIS process, conversations I had with officials of the Jo-Carroll LRA, and the written and displayed materials presented at the meeting were all very helpful.

032a

Aldermen from the Savanna City Council were present with me as were public members of our city economic development committees (that is, our Tax Increment Finance/Business Development Committee and our Riverfront Development Board).

032b

We at the City of Savanna agree that the LRA's proposal for commercial use of Parcel 20 is best for the overall economic development of our local area. It would help us in Savanna in two ways: 1) it would attract appropriate and healthy commercial and industrial use to the former Savanna Army Depot which is close enough to our downtown to help us recover from the economic effects of the base closure; and 2) it would steer such industrial uses away from our riverfront, which we are seeking to protect and enhance for public recreational enjoyment. We have created a Riverfront Development Board dedicated to reducing the industrial use of our riverfront in favor of such public recreational use. The LRA's proposal fits right in with our plans and will be excellent for our local economic development.

032c

032d

If there are questions you or others involved may have for me or our other city officials, please send them to me at [REDACTED] anytime. Or call me on my cell at [REDACTED].

032e

Thank you very much,

Val Gunnarsson
Mayor
City of Savanna

From: [Ron Smith](#)
To: [SVADAEIS](#)
Cc: [REDACTED]
Subject: FW: EIS (Parcel 20 Reuse)
Date: Wednesday, February 12, 2025 2:47:50 PM

I want the Army to perform the EIS for the full Commercial/Economic Development
In line with the LRA Board's preferred option for Parcel 20 Reuse.

The LRA has current opportunity to implement this type of use !

033a

I currently am a LRA Board Director representing Jo Daviess County for many Years.

I also want to thank the Army for their many years of service and cooperation
with other LRA Projects !

Regards

Ronald H. Smith

From: [Joanna Davies](#)
To: [SVADAEIS](#)
Subject: Savanna EIS Comments
Date: Wednesday, February 12, 2025 3:56:01 PM

Dear Mr. Lineer,

I am a middle and high school social worker in Carroll County. While I see many strengths and assets in my community, I also, through my work with students and families, see the many struggles they face. Every day I hear and see how the loss of industry has negatively impacted them. Over the years and through generations, the closing of the Army Depot, the loss of jobs at the railroad, the downsizing of the prison, and the closure of restaurants and shopping establishments have left a void in local opportunities available to our communities.

034a

This lack of opportunity prevents students from finding jobs and gaining valuable work experience; they lack exposure to careers outside of factory work, the prison, and farming; and in the end many people who are looking for more than these options leave our communities seeking employment and a life elsewhere. For many of the students with whom I work, I see non-intact families with parents in prison or simply absent from their children's lives. I see parents addicted to drugs and alcohol or grandparents with extensive health issues raising grandchildren. I see people suffering from undiagnosed and untreated mental health issues. I see all of the trauma that these situations cause, which in turn lead to students who cannot imagine a life beyond the one they are experiencing. And the cycle continues.

034b

Looking at the bigger picture, the lack of development in our area makes it difficult to recruit school faculty and staff who do not have familial ties to the area and who will commit to working here for more than a couple of years. There is high turnover in our schools. These vacancies and few to no applications for job openings leave the school filling positions with retirees who, according to the terms of their retirement, cannot work a full school year, which leaves students being taught by substitutes in their absence. That lack of stability in our educators has a negative impact on the kids in terms of their academic success, and more importantly, in terms of their ability to create positive bonds with a stable adult. Research shows that having a consistent, supportive adult in one's life is the antidote to trauma.

034c

Long story short, there is no silver bullet that will solve all of these problems. However, an increase in economic development in our community will lead to more positive outcomes, in every domain of their lives, for the students and families who live here.

034d

Sincerely,

Joanna Davies



Base Realignment and Closure Savanna Army Depot Activity
LRA Parcel 20 Environmental Impact Statement
CEQ Unique Identifier: EISX-007-21-000-1729699335

Public Scoping Comment Form

Scoping comments should be submitted by February 15, 2025

Comments can be submitted by email to: SVADAEIS@tetrattech.com	or By U.S. mail to: SVADA EIS c/o Tetra Tech 107 St. Francis Street, Suite 2370 Mobile, AL 36602
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Name: LaDon Trost, Chairperson

Organization: Jo Daviess County

Address: [REDACTED]

Email: [REDACTED]

Affiliation (please check a box):

- | | |
|---|---|
| <input checked="" type="checkbox"/> Elected Official | <input type="checkbox"/> Business/commercial organization |
| <input checked="" type="checkbox"/> Local government | <input type="checkbox"/> Historic preservation organization |
| <input type="checkbox"/> State government | <input type="checkbox"/> Nongovernmental organization |
| <input type="checkbox"/> Federal government | <input type="checkbox"/> Private citizen |
| <input type="checkbox"/> Native American Tribe/organization | <input type="checkbox"/> Other: _____ |

Please check the box next to the topic area(s) that you have comments/concerns about and write your comment on the reverse.

- | | |
|--|---|
| <input type="checkbox"/> Aesthetics and visual resources | <input type="checkbox"/> NEPA |
| <input type="checkbox"/> Air quality/climate | <input type="checkbox"/> Noise |
| <input type="checkbox"/> Biological resources | <input checked="" type="checkbox"/> Proposed action or alternatives |
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| <input type="checkbox"/> Environmental justice/children | <input type="checkbox"/> Water resources |
| <input type="checkbox"/> Geology and soils | <input type="checkbox"/> General Support |
| <input type="checkbox"/> Hazardous materials and waste | <input type="checkbox"/> General Opposition |
| <input type="checkbox"/> Land use | <input type="checkbox"/> Other: _____ |
| <input type="checkbox"/> Mitigation | _____ |
| <input type="checkbox"/> Navigation | _____ |

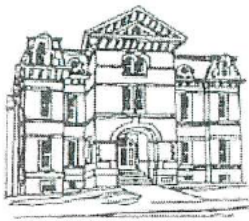
For more information regarding this project visit:
<https://www.lrd.usace.army.mil/Submit-ArticleCS/Programs/Article/3901394/>

Base Realignment and Closure Savanna Army Depot Activity
LRA Parcel 20 Environmental Impact Statement
CEQ Unique Identifier: EISX-007-21-000-1729699335

[illegible]

Thank you for your comments.

For more information regarding this project visit:
<https://www.lrd.usace.army.mil/Submit-ArticleCS/Programs/Article/3901394/>



JO DAVIESS COUNTY BOARD

330 North Bench Street

GALENA, ILLINOIS 61036

Tele: 815-777-6557 Fax: 815-777-0458

Email: countyadministrator@jodaviesscountyl.gov

SVADA EIS

c/o Tetra Tech

107 St Francis Street Suite 2370

Moline, AL 36602

Thomas Lineer, BRAC Program Manager

Dear Mr Lineer:

Thank you for the opportunity for the public and Jo Daviess County Board members to review and comment on the transfer of LRA Parcel 20's 132 acres. In 2016, when the US Fish and Wildlife Service officially withdrew its interest in this parcel, there was great excitement that the local economy could be boosted with opportunities for use by residents and visitors. The LRA has been cognizant of environmental concerns while researching responsible and practical uses that will bring greater value and interest to Parcel 20.

035a

The reuse for commercial/economic development alternatives presented by LRA will answer the growing needs for our rural communities in Illinois. Although there is importance of recreation in attracting a workforce, it does not outweigh the need for job creation and improved economic growth outlook.

035b

The declining population of the area's workforce must be faced with assertive actions to improve job opportunities and reduced tax burdens. Local boards, councils and community groups are eager to see growth stimulated. We hope this will be expedited for those dedicated to improving our northwestern part of Illinois.

035c

Your approval of the transfer and reuse of Parcel 20 to the Jo-Carroll Depot Local Redevelopment Authority is requested by the Jo Daviess County Board.

035d

Thank you for your consideration of our request.

Sincerely,

LaDon Trost
County Board Chairperson
Jo Daviess County

From: [Christopher Yacu](#)
To: [SVADAEIS](#)
Subject: Disapproval of the LRA turning Brickhouse Slough into a barge staging area
Date: Thursday, February 13, 2025 10:52:54 AM

Please consider this email my formal objection and disapproval of the LRA trunking the Brickhouse Slough into a barge staging area.

036a

As lifetime locals this would be detrimental to the area.

Chris Yacu

From: [Will Morlock](#)
To: [SVADAEIS](#)
Subject: LRA Parcel 20 Reuse Plan Rejection
Date: Thursday, February 13, 2025 11:56:45 AM

I am writing this email today to strongly oppose the LRA Parcel 20 reuse plan for allowing barges to tie up and wait to be loaded or unloaded from the silos in the slough. This proposal would greatly affect the amazing fishing and wildlife area and disturb local residents. As someone who grew up coming to this area to fish and hunt, I don't want to see it ruined over a compromise plan. The Apple River project was strongly opposed for similar reason and this proposal would do much the same damage. Please do not allow this beautiful natural area to be used for a barge facility.

Thank you for your consideration.

Sincerely,

Will Morlock

037a

037b

From: [Brian Hughes](#)
To: [SVADAEIS](#)
Subject: Barge staging
Date: Thursday, February 13, 2025 10:54:16 AM

Don't let them do it. | 038a

From: [Tom Miller](#)
To: [SVADAEIS](#)
Subject: Stop the LRA easement
Date: Thursday, February 13, 2025 12:07:41 PM

Hello,

Extending the loading and unloading dock will create the potential for barge staging issues that will impact local wildlife, tourism and locals. Please stop the approval of this easement.

039a

Thank you,
Thomas Miller

From: [Brandon Yacu](#)
To: [SVADAEIS](#)
Subject: Disapproval of Brickhouse Slough changes
Date: Thursday, February 13, 2025 12:21:12 PM

Good morning,

I am writing to communicate my displeasure in the plans to turn the Brickhosue Slough into a barge staging/loading area. I believe this will be detrimental to the wildlife and well-being of residents in the area who are frequently utilizing this resource.

040a

Brandon Yacu



From: [Ashley Dalton](#)
To: [SVADAEIS](#)
Subject: Apple River Barge Encampment
Date: Thursday, February 13, 2025 8:27:54 PM

Dear the Representative of the EIS,

I hope you're doing well. I'm reaching out to express my concerns about the proposed barge encampment at the mouth of the Apple River, near the Savanna Army Depot. As a local property owner, I believe this development would seriously impact the area's recreational value, which has been a peaceful retreat for many years.

041a

Our family has long enjoyed the Apple River's natural beauty. The peaceful environment is a key reason so many people visit. The proposed encampment would disrupt this, diminishing the enjoyment of activities like fishing, boating, and simply being outdoors. For us, this place holds significant personal value, and any industrial development would change it forever.

041b

I urge you to reconsider this plan and explore alternatives that protect the river's charm for future generations.

041c

Thank you for your time and consideration. I'd appreciate the opportunity to discuss this further.

041d

Sincerely,

Ashley

From: [Chris Falk](#)
To: [SVADAEIS](#)
Subject: Savanna Army Depot CEQ Unique Identifier: EISX-007-21-000-172969935
Date: Thursday, February 13, 2025 11:04:54 PM

Regarding the initial proposal for the Commanders Pond Full . . . it was a total joke and waste of time. It did not involve any EPA, Fish and Wildlife, nor the Army Corp of Engineers. Each one of these organizations had numerous reasons for shooting down this proposal which the local LRA spent to have a very expensive, yet useless Final Reuse Plan for Parcel 20 composed by Balcom Environmental Services. As documented in the Final Use Plan for Parcel 20, the area is full of PFASs, or more commonly known as “Forever Chemicals” which are known to cause health problems with both humans and animals and contain components of which break down very slowly over time and sometimes not at all. Yes, they say they have cleaned up the commander’s pond, however on page 14 of the Final Reuse Plan for Parcel 20 composed by Balcom Environmental Services, they note that “There are two Confirmed PFAS contamination sites that lie immediately upgradient from Parcel 20 and have stormwater outfalls that discharge directly into the Commander’s pond”. So with PFAS’s pouring into the exact proposed site for their loading and unloading terminal, this is obviously not a realistic or feasible project.

042a

042b

The answer to the previous question is obvious . . . The LRA knew their Commander’s Pond Full proposal would be shot down by the Fish and Wildlife Service (and other agencies). So, the only angle for the LRA was a bait and switch tactic saying, “You won’t let us build over here, but how about over there?” It is well known that the LRA is asking for a 50’ easement from the current silos to Brickhouse Slough. However, with the 50’ easement proposal, the effects on Brickhouse Slough are just as bad as the Commanders Pond Full proposal. For this reason, I continue to also explain why even the 50’ easement proposal is a project that should not be considered.

042c

So, reasons against the compromise to a 50’ easement are numerous . . .

1. **Waste of Government grant spending.** This proposed barge loading facility would survive only by stealing customers of other barge loading facilities. The proposed “Organic Growth” to entice new potential customers to ship by barge is just a crazy dream and if you talk to the current barge loading facilities, they are struggling to stay busy at times. Products that can benefit from shipping via barge, are already shipping via barge. All the crazy and inflated Employment jobs, per person, per year are based on loading and unloading these make-believe prospective barge freight products (windmill turbine blades, plastic recycling, and

042d

ethanol). None of these could be loaded or unloaded via a 50' easement from the grain elevator.

2. If this were anything other than a **government grant fleecing** it would never be built because the ROI isn't there. The needed spending would be well into seven figures to build this facility, and the payback will be literally in pennies per year. Barge loading facilities deal with products that are very low margin and require large volumes to potentially be profitable. Because margins are slim, barge loading facilities operate with the fewest employees as possible. The potential "jobs generated" numbers on the Final Reuse Plan for parcel 20, are based on potential numbers that include products that currently do not ship via barge for a reason. These numbers are more of a wish list than actual potential job creation.

042e

3. **Brickhouse Slough is unique and a heavily used recreational area for Pool 13.** It contains one of the only sloughs that parallels the main channel and allows for water skiing and tubing for kids without dangerous barge traffic. Brickhouse Slough was created when the Army Corps of Engineers decided that the main channel should go west of Apple River Island, and they created wing dams to steer the river west instead of down Brickhouse Slough which used to be the main channel. Removal of any of these wing dams to allow barge access into the north end of Brickhouse Slough would have major environmental impacts and could change the flow of the river. Also, on the bottom of Brickhouse Slough is what they call a closing dam. This dam closes the slough, but more importantly holds back water that allows the slough to be navigated. Removing the closing dam to allow barges to enter from the south end of Brickhouse Slough would also be an environmental disaster lowering water levels in the slough beyond what the expensive dredging could compensate for.

042f

4. **Minimal Job Creation for Maximum Negative Environmental Effects.** A typical barge (loading only, no crazy windmill blades, etc.) generally employs about 6 – 10 employees. So, the creation of mere 6- 10 jobs is no where close to outweighing the negative environmental impact on Brickhouse Slough. Creating this barge loading only port will face a guaranteed uphill battle against local recreational users of Brickhouse Slough, as well as the other agencies discussed (Fish and Wildlife, Army Corp of Engineers, Illinois Department of Natural Resources, Illinois EPA, Federal EPA and others).

042g

In conclusion here I just want to say that I do not envy the position the LRA Board is in trying to accomplish a very difficult task of turning the former Savanna Army Depot into

042h

local jobs. While I support many of their efforts for economic development at the former Depot, there are always several different angles from many different perspectives to consider and work through to accomplish their goal. Put plainly, they have a very difficult job, and normally I support their efforts, however turning Brickhouse Slough into a barge loading terminal is one the projects I just can't get behind.

Chris Falk

Cell [REDACTED]

From: [Garrett Hartig](#)
To: [SVADAEIS](#)
Subject: Jo Carroll Depot LRA Project
Date: Thursday, February 13, 2025 5:17:18 PM

Hello, I would like to express my disapproval of this project. I just recently purchased a home on the Brickhouse Slough and enjoy the quiet and peaceful atmosphere along with the fishing and other wildlife. Many people use this slough as a recreational area and it could cause very dangerous situations if they allow barge traffic and also disturb the wildlife in this slough. And I really hope that the ancient Indian grounds don't get disturbed with this project. If we as land owners had a vote every single one of us would vote NO! And I hope Fish and Wildlife along with the Army Corps would also turn this project down.

Sent from my iPhone

043a

043b

043c

From: [Max Morlock](#)
To: [SVADAEIS](#)
Subject: Disapproval of Mississippi River Easement: LRA
Date: Thursday, February 13, 2025 11:24:26 AM

Good morning,

I disapprove of the proposed project that calls for a 50ft Easement into the mississippi river.

You know the one I'm speaking of, please don't be all cheeky with it ;)

Have a great day!

044a

From: [Matt Morlock](#)
To: [SVADAEIS](#)
Subject: Barge Project, Apple River
Date: Thursday, February 13, 2025 8:21:10 PM

Dear Representative,

I am writing to express my strong concerns regarding the proposed plan to build a barge encampment at the mouth of the Apple River, near the Savanna Army Depot. As a property owner in the area and someone who enjoys the natural beauty of this region, I believe this project would significantly harm the recreational value of the area, which has long been a retreat for many.

045a

Our family has enjoyed hunting, fishing, and spending time at our cabin near the river for generations. The Apple River and its surrounding landscape are a vital part of what makes this area so special. The peaceful, scenic environment is a key reason so many people, including myself, come here to relax and enjoy nature. The proposed barge encampment, however, would disrupt the tranquility and beauty of the area, diminishing its appeal to visitors and residents alike.

045b

With the construction of the encampment, it's likely that recreational activities such as fishing, boating, and simply enjoying the river would be negatively impacted. The area could become less accessible and less enjoyable for those who come to experience its natural beauty. For many of us, this place is not just a property—it's a cherished part of our lives, and I fear that any industrial development would irreparably change its character.

045c

I kindly urge you to reconsider this plan and explore alternatives that will allow the Apple River to retain its charm and value as a recreational destination. It is important to preserve the special quality of this area for future generations to enjoy.

045d

Thank you for your time and consideration. Please do not proceed with this project in such a wonderful area.

045e

Sincerely,

Matt Morlock

Base Realignment and Closure Savanna Army Depot Activity
LRA Parcel 20 Environmental Impact Statement
CEQ Unique Identifier: EISX-007-21-000-1729699335
Public Scoping Comment Form Submitted by February 15, 2025

Randy Nyboer
Private Citizen, retired IDNR/INHS
[REDACTED], Morrison, IL 61270

Boxes Checked: Biological resources, Hazardous materials and waste, Land use, Navigation, General opposition

Comments: I found combining the Parcel 20 EIS Public Scoping Meeting with preview of the LRAs Final Reuse Plan for Parcel 20 a different but interesting approach than what has been presented at past scoping meeting. The Reuse Plan provided an insightful and expensive need and guidance for the remediation of Parcel 20.

046a

My concerns within Parcel 20 center on the environmental remediation of Site 178 (Ordinance School Lake/Commanders Pond) and its western bank. The clean up of this area will be the driver to the Final Reuse Plan. The process and timetable for completing this hasn't been presented here. While the methodology for removing the contaminants is determined by the regulators, the placement of additional dredge spoil also needs to be addressed.

046b

Because the remediation of the above site directly influences the implementation of the Reuse Plan for Parcel 20, it also directly influences the serious negative impacts to the biological resources, land use, and commercial navigation adjacent to the parcel. The proposed dredge cut will go beyond Parcel 20 and directly impact the FWS Refuge to gain access to the river. The construction, maintenance and use of a wharf, drydock and conveyor/pipelines will also directly impact the Refuge. The fleeting of barges around Apple River Island also has the potential to impact the Refuge and riverine biological resources. The dredging of Brickhouse Slough will be an ongoing exercise where dredge spoil will need to be placed where? As well as harm rare biological resources. Finally, the overall commercial navigation on the river is dependent on the wing dams and structure the COE designed to maintain the main channel. The removal or altering of these structures, as proposed in the reuse plan, will negatively influence the navigation channel. FWS and the COE have previously indicated these issues to earlier proponents of barge developments. What has changed?

046c

046d

046e

One last comment. The recreational attributes of the reuse plan are probably just a nice try to appease the recreationalists, but maintaining a trail within an active floodplain and developing a picnic area on top of a landfill are not the kindest proposals to present to outdoor users.

046f

Thank you for allowing me to comment.
13 Feb 2025

From: [Vivek Mistry](#)
To: [SVADAEIS](#)
Subject: Opposition to Environmental Impact Statement for LRA Parcel 20
Date: Monday, February 17, 2025 9:11:13 AM

I am writing to express my opposition to the Environmental Impact Statement (EIS) for the Disposal and Reuse of LRA Parcel 20 at the Savanna Army Depot Activity, located in Carroll and Jo Daviess Counties, Illinois.

047a

This project threatens the ecosystem of the Mississippi River, which is home to many of my favorite spots, and could result in the irreversible destruction of vital habitats. The environmental impact would be devastating, and I strongly urge reconsideration of this proposal.

047b

Thank you for your time and attention to this important issue.

Vivek Mistry

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Base Realignment and Closure Savanna Army Depot Activity
 LRA Parcel 20 Environmental Impact Statement
 CEQ Unique Identifier: EISX-007-21-000-1729699335

Public Scoping Comment Form

Scoping comments should be submitted by February 15, 2025

Comments can be submitted by email to:
SVADAEIS@tetrattech.com

or
 By U.S. mail to:
SVADA EIS c/o Tetra Tech
107 St. Francis Street, Suite 2370
Mobile, AL 36602

Name:

Kim Falk

Organization:

Address:

Email:

Savanna, IL

Affiliation (please check a box):

- | | |
|---|---|
| <input type="checkbox"/> Elected Official | <input type="checkbox"/> Business/commercial organization |
| <input type="checkbox"/> Local government | <input type="checkbox"/> Historic preservation organization |
| <input type="checkbox"/> State government | <input type="checkbox"/> Nongovernmental organization |
| <input type="checkbox"/> Federal government | <input checked="" type="checkbox"/> Private citizen |
| <input type="checkbox"/> Native American Tribe/organization | <input type="checkbox"/> Other: _____ |

Please check the box next to the topic area(s) that you have comments/concerns about and write your comment on the reverse.

- | | |
|---|--|
| <input checked="" type="checkbox"/> Aesthetics and visual resources | <input type="checkbox"/> NEPA |
| <input checked="" type="checkbox"/> Air quality/climate | <input checked="" type="checkbox"/> Noise |
| <input type="checkbox"/> Biological resources | <input type="checkbox"/> Proposed action or alternatives |
| <input type="checkbox"/> Coordination/communication | <input type="checkbox"/> Socioeconomics |
| <input type="checkbox"/> Cultural and historic resources | <input type="checkbox"/> Traffic/transportation |
| <input checked="" type="checkbox"/> Cumulative effects | <input type="checkbox"/> Utilities and infrastructure |
| <input type="checkbox"/> Environmental justice/children | <input checked="" type="checkbox"/> Water resources |
| <input checked="" type="checkbox"/> Geology and soils | <input type="checkbox"/> General Support |
| <input checked="" type="checkbox"/> Hazardous materials and waste | <input type="checkbox"/> General Opposition |
| <input checked="" type="checkbox"/> Land use | <input checked="" type="checkbox"/> Other: <u>Environmental/Wildlife</u> |
| <input type="checkbox"/> Mitigation | |
| <input checked="" type="checkbox"/> Navigation | |

For more information regarding this project visit:
<https://www.lrd.usace.army.mil/Submit-ArticleCS/Programs/Article/3901394/>

To: Whom it May Concern

From: Kim Falk, Concerned Citizen and Resident near Parcel 20

Re: Concerns regarding the usage of LRA Parcel 20

My husband and I attended the informational meeting on January 16, 2025 at the Savanna High School regarding the potential installation of a barge terminal utilizing land at the former Savanna Army Depot and along/in the Mississippi River along a section referred to as "Brick House Slough". We own a secondary property a short distance upstream from the "Commanders Pond" on the Apple River. In addition, I was born and raised in Savanna, Illinois. My family spent countless hours boating, camping, and enjoying the Mississippi River in the general Savanna area (including this section of the river). I would like to address some concerns I have regarding this potential development.

048a

*Habitat - As a child (and even most of my adult life), it was a very rare occasion to see bald eagles, sandhill cranes, swans, pelicans, etc. The river was unhealthy for such birds due to pesticides and perhaps even the contaminants spilled/seeped into our river system from ammunitions and PFAS. Now, it is clear that our area's river system is indeed much healthier, as we have seen the return and repopulation of these birds. I am incredibly concerned that bringing such a development to this area would harm these and other wildlife populations. As we know, to bring this project to fruition, a large amount of dredging would be required. Dredging causes entrainment, habitat degradation, noise, and increased sedimentation. Dredging could also "stir up" and release harmful contaminants, such as explosives and PFAS, that have long since been buried and are currently undisturbed. This would impact not just the habitat and the river's health but could ultimately contaminate drinking water of residents and communities in the area. Barge traffic in and out of this area would further increase this contamination and sedimentation with the constant moving of the barges by (assumed) tug systems, as they draw water from the river and sediment from the river bed when operating.

048b

*Endangered species - This area is home to many native species that are also considered endangered or are on "watch lists". I assume there will be an in-depth study to rule out disturbing the habitat/environment of any such species that would further inhibit their population.

048c

*Contaminates - We know there has been extensive "cleaning up" of the soil, Commanders Pond, and other items of concern at the SAD. However, we also are aware that there is much more to do. Unfortunately, there are some contaminants within the SAD confines and beyond that will never be able to be "cleaned up". In a lengthy document found online regarding this potential development, there is information regarding PFAS being found and draining into the Commander's Pond. Do you know if there are any plans to test the area's drinking water and/or water tables to rule out the possibility of such contaminants being in this water? I am concerned that dredging and constant barge traffic in and around this area of contamination will stir these contaminants up into the environment and water system.

048d

*Noise - While noise can have a detrimental effect of wildlife in the area, I also have a concern for those of us that have homes in this area. We enjoy the peace and quiet that this area provides. Noise is part of the game with grain elevators, trucks, and barges. This noise would impact our quality of life in this area. Studies have also shown that noise pollution can have detrimental health effects on humans and organisms.

048e

*Aesthetically - This river area has been relatively untouched by industry. It's part of why so many people are drawn to enjoy this section of the river. Having a barge terminal here would negatively impact the beautiful scenery of this area. Barges tied up along the shorelines certainly isn't my idea of a relaxing, enjoyable day on the river. I would assume that many other boaters, fishermen/women, and campers feel the same way. Many businesses in our area rely on summer boat traffic to help sustain their business. Would this impact their business success? Personally, I would be very upset to have this basically "in my backyard". We would be finding our

048f

way through barges to get into Brickhouse Slough AND to get to the river's main channel.

048f
cont'd

I understand that this project could potentially impact our economy in our area by providing some jobs and other sources of income. I want nothing more than to find some employment opportunities for our communities. However, we must ask ourselves..."At what cost?". How much damage to our environment, habitats, living conditions, personal enjoyment, and undisturbed river section is too much? How much would outweigh the possible positives that could come from it? Personally, I am someone who has always been concerned about pollution and the environment. I feel that the gains would not outweigh the damages that this would bring. Therefore, I am not in favor of seeing this project come to the area in the future.

048g

Sincerely,

A handwritten signature in cursive script that reads "Kim Falk".

Kim Falk [REDACTED]
Concerned Citizen

From: [Alissa King](#)
To: [SVADAEIS](#)
Subject: Barge staging
Date: Friday, February 14, 2025 7:35:32 PM

I opposed the Environmental Impact Statement (EIS) for Disposal and Reuse of LRA Parcel 20 at Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois.

049a

From: [matthew.collins](#)
To: [SVADAEIS](#)
Subject: Barge staging
Date: Friday, February 14, 2025 7:34:43 PM

I opposed the Environmental Impact Statement (EIS) for Disposal and Reuse of LRA Parcel 20 at Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois.

050a

Best,
Matt

From: [Danny Argomaniz](#)
To: [SVADAEIS](#)
Subject: I opposed the Environmental Impact Statement (EIS)
Date: Friday, February 14, 2025 6:13:37 PM

I opposed the Environmental Impact Statement (EIS) for Disposal and Reuse of LRA Parcel 20 at Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois.

051a

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From: [Lauren Chambers](#)
To: [SVADAEIS](#)
Date: Friday, February 14, 2025 6:13:10 PM
Attachments: [Outlook-OneDigital.png](#)

I opposed the Environmental Impact Statement (EIS) for Disposal and Reuse of LRA Parcel 20 at Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois.

052a



Lauren Chambers
Benefit Advisor, OneDigital
[REDACTED] Chicago, IL

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From: [Tori Wilcox](#)
To: [SVADAEIS](#)
Date: Friday, February 14, 2025 6:07:42 PM

I oppose the Environmental Impact Statement (EIS) for Disposal and Reuse of LRA Parcel 20 at Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois.

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053a

From: [Lindsey Gulliksen](#)
To: [SVADAEIS](#)
Subject: EIS
Date: Friday, February 14, 2025 6:02:06 PM
Attachments: [Outlook-OneDigital.png](#)

I opposed the Environmental Impact Statement (EIS) for Disposal and Reuse of LRA Parcel 20 at Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois.

054a



Lindsey Gulliksen
Benefit Advisor, OneDigital
[REDACTED] | Chicago, IL

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From: [Nicholas Walkow](#)
To: [SVADAEIS](#)
Subject: Environmental Impact Statement
Date: Friday, February 14, 2025 6:01:57 PM

I opposed the Environmental Impact Statement (EIS) for Disposal and Reuse of LRA Parcel 20 at Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois.

055a

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From: [Joe Cochrane](#)
To: [SVADAEIS](#)
Subject: I oppose the EIS
Date: Friday, February 14, 2025 6:00:50 PM

I opposed the Environmental Impact Statement (EIS) for Disposal and Reuse of LRA Parcel 20 at Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois.

056a

From: [Andrew Fruci](#)
To: [SVADAEIS](#)
Subject: EIS
Date: Friday, February 14, 2025 6:00:04 PM

I opposed the Environmental Impact Statement (EIS) for Disposal and Reuse of LRA Parcel 20 at Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois.

057a

Andrew

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From: [Jocelyn Bernal](#)
To: [SVADAEIS](#)
Subject: Disposal of Parcel 20
Date: Friday, February 14, 2025 5:58:10 PM

I opposed the Environmental Impact Statement (EIS) for Disposal and Reuse of LRA Parcel 20 at Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois.

058a

From: [Trevor Washington](#)
To: [SVADAEIS](#)
Subject: Mississippi river
Date: Friday, February 14, 2025 5:57:56 PM

I opposed the Environmental Impact Statement (EIS) for the Disposal and Reuse of LRA Parcel 20 at Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois.

059a

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From: [Glenn Dale Obrero](#)
To: [SVADAEIS](#)
Subject: EIS
Date: Friday, February 14, 2025 5:57:36 PM
Attachments: [Outlook-3kfxznog.png](#)

I opposed the Environmental Impact Statement (EIS) for Disposal and Reuse of LRA Parcel 20 at Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois.

060a



Glenn Obrero
Benefits Advisor, OneDigital
[REDACTED] | Chicago, IL

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United States Department of the Interior

FISH AND WILDLIFE SERVICE
 Upper Mississippi River National Wildlife and Fish Refuge
 7071 Riverview Road
 Thomson, Illinois 61285
 February 18, 2025



Beverly Hayes
 SVADA EIS c/o Tetra Tech
 107 St. Francis Street, Suite 2370
 Mobile, Alabama 36602

Dear Ms. Hayes:

As a follow-up to our agency meeting on January 16, 2025, regarding the transfer of Parcel 20 from Army to Jo-Carroll Depot Local Redevelopment Authority (LRA), I have summarized below the primary concerns that U.S. Fish and Wildlife Service' Upper Mississippi River National Wildlife and Fish Refuge (Refuge) has expressed to Army.

061a

1. The development of facilities on lands owned by the Refuge is in violation of numerous federal laws including the National Wildlife Refuge Improvement Act of 1997.

061b

2. There is potential for damage to natural resources including the federally endangered Higgins eye pearlymussel (previously found to be present along the shoreline) due to development within Brickhouse Slough.

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3. The proposed access plan for towboats/barges entering Brickhouse Slough identified in LRA's Final Reuse Plan is different from the access plan identified by Executive Director Mara Roche during the agency meeting. The Final Reuse Plan (page 79) identifies access will be from the south, whereas Mara identified access will be from the north. The correct access path into Brickhouse Slough needs to be identified as it determines how much material needs to be excavated and its impacts to bordering areas.

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4. The LRA's Final Reuse Plan identifies 1,237,450 cubic yards of material to be excavated that includes 304,808 cubic yards of contaminated material. These estimates are based on towboat/barge access into Brickhouse Slough from the south according to the Final Reuse Plan and will need to be revised to correlate with access into the slough from the north.

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5. The removal of contaminated material within Commander's Pond could potentially contaminate Upper Mississippi River waters. A detailed material excavation/placement plan needs to be provided that identifies: how safety precautions will be taken for handling contaminated versus uncontaminated material; the location where contaminated and uncontaminated material will be

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placed; initial cost to implement an excavation/placement plan, and; an estimate of annual maintenance quantities/costs that will be required to maintain a 9-foot deep channel leading into and within Brickhouse Slough and Commander's Pond.

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6. An updated towboat/barge access plan is also important to determine the impact to wing dams and closing dams that border the project area. There are several wing dams located at the northwest entrance to Brickhouse Slough that would potentially have to be removed to allow towboat/barge access from the north. In addition, the closing dam within Brickhouse Slough will have to be removed. There is also an elongated wing dam that lies parallel along the west shoreline of Apple River Island. These wing dams and the closing dam are important for maintaining the 9-foot navigation channel, and removal may impact commercial navigation.

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7. Fleeting of barges on the west shoreline of Apple River Island is identified in the Final Reuse Plan and may encroach upon the river's main navigation channel. Wing dams are located along the Iowa side of the main channel adjacent the island, so towboats/barges must use the narrow Illinois side of the channel for navigation.

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Thank you for the opportunity to once again express these concerns. I'm looking forward to seeing how these and the many other concerns raised during the agency meeting will be addressed in the EIS process.

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Sincerely,



Ed Britton

Savanna District Manager

Upper Mississippi River National Wildlife and Fish Refuge



REGION 5
CHICAGO, IL 60604

March 20, 2025

VIA ELECTRONIC MAIL ONLY

Thomas Lineer, BRAC Program Manager
Department of the Army
Savanna Army Depot Activity
18935 B Street
Savanna, Illinois 61074

**Re: EPA Scoping Comments for a Draft Environmental Impact Statement for the
Implementation of Base Realignment and Closure Disposal and Reuse of Parcel 20,
Savanna Army Depot Activity, Illinois Carroll and Jo Daviess Counties, Illinois**

Dear Mr. Lineer:

The U.S. Environmental Protection Agency is responding to the Department of the Army's December 20, 2024, Notice of Intent to prepare an environmental impact statement for the disposal and expected subsequent reuse of parcel 20 at Savanna Army Depot (SVAD). The USEPA has reviewed the Notice of Intent pursuant to the National Environmental Policy Act and Section 309 of the Clean Air Act. The CAA Section 309 role is unique to EPA. It requires EPA to review and comment on the environmental impact of any proposed federal action subject to NEPA's environmental impact statement requirements and to make its comments public.

The SVAD site is a 13,062-acre former DoA installation located on the eastern bank of the Mississippi River, nine miles north of Savanna, Illinois. Between 1917 and 1995, the DoA used the property for artillery weapons and ammunition testing, storage of ordnance, and the loading and renovating of shells and bombs. The 1995 Base Realignment and Closure (BRAC) Commission recommended closure of SVAD. A 1997 environmental impact statement evaluated the closure, and the SVAD was officially closed in 2000.¹ The forthcoming Draft EIS will supplement the 1997 EIS. The DoA has been conducting environmental remediation to clean up this surplus property in preparation for eventual property transfer.

On January 17, 2018, the DoA published notice in the Federal Register indicating surplus property was available at SVAD for public benefit purposes and that the Jo Carroll Depot Local Redevelopment Authority (LRA) had been recognized by the Department of Defense as the LRA for this surplus property. The LRA performed an analysis (the Parcel 20 Reuse Plan) in support

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¹ Approximately 5,350 acres have been transferred as of December, 2024.

of reuse planning for LRA Parcel 20, which covers 132-acres, for DoA's use when preparing the NEPA scoping document.

The 132-acre parcel is undeveloped land sharing a border with the Upper Mississippi River National Wildlife and Fish Refuge, the Apple River, and a tributary of the Mississippi River. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast. The railway right-of-way and a sewage treatment plant surrounded by the 132-acre parcel and owned by the DoA are not part of the parcel to be transferred.

The LRA's finalized 2023 reuse plan presents three conceptual reuse alternatives for developing LRA Parcel 20, which focus on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development. Three conceptual alternatives for redevelopment of LRA Parcel 20 were identified in the scoping document as follows:

Alternative 1 (Brickhouse Slough) – This alternative prioritizes fleet² development of a dry bulk and liquid bulk wharf on the Brickhouse Slough and recreational use. Key port infrastructure includes a barge fleeting area, an 800-foot dry and liquid bulk wharf, a floating dry dock, a wharf access road, a haul road, a liquid bulk pipeline, and a conveyor system.

Alternative 2 (Commander's Pond Lite) – This alternative expands on Alternative 1 and adds a 600-foot lift-on/lift-off wharf to allow the handling of two 250-foot barges simultaneously to support expansion of specialty and breakbulk cargos and dry dock capacity. This concept would require approximately 18 acres of dredging within the Commander's Pond area to support access to Brickhouse Slough.

Alternative 3 (Commander's Pond Full) – This alternative expands on Alternative 2 and adds additional port support to include an additional 350-foot lift-on/lift-off wharf to allow the handling of two 250-foot barges simultaneously, a repair fleeting area, and the inclusion of an aquatic habitat restoration area. This concept would require approximately 42 acres of dredging within the Commander's Pond area with 26 acres to support cargo activities and the remaining 16 acres dedicated for aquatic habitat restoration. Alternative 3 is the LRA's preferred alternative as of November 27, 2023.

To facilitate implementation, the LRA designed the alternatives as sequential phases. Alternative 1 could be implemented within a target 5-year completion window, while Alternatives 2 and 3 could follow, with both having 5-year-plus completion windows. The LRA's proposed reuse plan includes activities outside the boundary of LRA Parcel 20.³ Each of the LRA's reuse alternatives would require dredging.

The timing for capital expenditures is not fully established and will depend in large part on market interest and development participation by private partners as well as regulatory and permit processes. To facilitate implementation, the alternatives are designed to phase into

² Fleeting would provide "parking areas" while cargo is being loaded/offloaded.

³ In the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island.

each other seamlessly and sequentially. For example, Alternative 1 could be initiated immediately with a target five-year completion window, while Alternatives 2 and 3 could follow in a five-year plus completion window.

EPA provided detailed NEPA scoping comments dated February 2, 2024 and August 26, 2024 (see enclosed letters). Our comments in this letter recommend the forthcoming DEIS address our recommendations regarding the purpose and need/project alternatives, Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) sites, impacts to aquatic resources, sediment sampling/management, air resources and emission impacts, project design/staging, socioeconomic impacts and public involvement, climate effects, energy efficiency and environmental best practices, natural features, non-native invasive species, historic and cultural resources, and interagency coordination and permitting.

Thank you for the opportunity to participate in project planning at the earliest stages. Please contact the lead NEPA Reviewer, Kathy Kowal, via email at kowal.kathleen@epa.gov if you have any questions regarding the contents of this letter as well as to arrange inter-agency meetings concerning this project. Electronic copies of future NEPA correspondence related to this project should be sent to R5NEPA@epa.gov.

Sincerely,

KRYSTLE
MCCLAIN

Digitally signed by
KRYSTLE MCCLAIN
Date: 2025.03.20
08:00:42 -05'00'

Krystle Z. McClain, P.E.
NEPA Program Supervisor
EPA Region 5

Enclosures:

EPA Detailed Scoping Comments

Appendix A, Construction Emission Control Recommendations

EPA's scoping letters dated August 26, 2024 and February 2, 2024

CCs (with enclosures):

William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

Ed Britton, Upper Mississippi River National Wildlife and Fish Refuge

Jodi Creswell, U.S. Army Corps of Engineers, Rock Island District

Joe Hand, U.S. Army Corps of Engineers, Mobile District

Charlene Falco, Illinois Environmental Protection Agency

Bradley Hayes, Illinois Department of Natural Resources

Kraig McPeck, U.S. Fish and Wildlife Service

Nicole Goers, U.S. Environmental Protection Agency

EPA's Detailed Comments
Draft Environmental Impact Statement for the
Implementation of Base Realignment and Closure Disposal and
Reuse of Parcel 20, Savanna Army Depot Activity
Carroll and Jo Daviess Counties, Illinois
March 20, 2025

1. PURPOSE AND NEED / PROJECT ALTERNATIVES

- A. The project website⁴ indicates the DoA is preparing an EIS to evaluate the environmental and socioeconomic effects of the disposal and reuse of the 132-acre parcel of land of SVAD. Under the proposed action, DoA would dispose of the parcel and transfer the parcel for reuse according to the LRA's finalized 2023 reuse plan. The forthcoming EIS analysis should include elimination criteria and clear explanations of why alternatives were dismissed.

Recommendations for the DEIS:

1. Analyze the No Action Alternative and all action alternatives which satisfy the purpose and need. For each alternative presented:
 - a) Describe the potential action(s) that would be taken by the transferee. Consider all phases of a potential project when analyzing connected actions.
 - b) Specify activities that would occur in-water versus out of water.
 - c) Visually depict each alternative, including the proposed project footprint and project elements (e.g., staging areas).
2. Identify any alternatives considered but dismissed from further consideration.⁵ Provide elimination criteria and clear explanations for their elimination.
3. Analyze impacts to navigation along the Upper Mississippi River's main channel from barges fleeing near Apple River Island.
4. Identify LRA's previous studies and concerns identified by the LRA Environmental Committee.⁶ Discuss how previous plans and discussions with the Committee informed proposed alternatives to be analyzed in the DEIS.
5. Explain traditional versus accelerated disposal options and how each option would affect the alternatives.

2. COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT (CERCLA) SITES

- A. LRA Parcel 20 includes several CERCLA sites which were previously investigated [e.g., Site 20 (Abandoned Landfill), Site 73 (Stables Landfill), Site 77 (1917-Era Powder Magazines), Site 130 (Vincent Road Septic System), Shop Area (Buildings 100 through 129 Sanitary and Stormwater Sewer lines and Outfalls to Site 178 and Site 178 (Ordnance School

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⁴ www.lrd.usace.army.mil/Submit-ArticleCS/Programs/Article/3901394/

⁵ Previous discussions to transfer parcel to U.S. Fish and Wildlife Service, transfer to USACE to manage dredged materials, etc.

⁶ For example, Savanna Army Depot Reuse Plan and Implementation Strategy dated December 1996.

Lake, also known as Commander's Pond)⁷]. Because two sites still have incomplete actions related to their respective remedial action process, the DEIS should discuss each alternative in relation to these remaining actions. Based on information available to EPA, the current status of the CERCLA sites is as follows:

- **Site 20 (Abandoned Landfill):**

According to the *Final Record of Decision, Site 20 – Abandoned Landfill and Site 99 – Building 762, CF Plant Battery Shop and Leaching Pits, Savanna Army Depot Activity, Savanna, Illinois*, dated June 2016 (Site 20 Record of Decision (ROD)), the selected remedy included landfill capping with hotspot removal, long-term groundwater monitoring, and land use controls (LUCs). Based on the *Final Land Use Control Implementation Plan, Site 20 Abandoned Landfill, Savanna Army Depot Activity, Savanna, Illinois*, dated October 2019 (Site 20 LUCIP), the institutional and engineering controls for Site 20 include:

- environmental covenants to prohibit residential use, access to groundwater, and intrusive activities (including agricultural use) at the site;
- Illinois Environmental Protection Agency (Illinois EPA), DoA, and EPA review of LUC inspections and approval processes;
- maintenance of a vegetated engineered landfill cap constructed with at least 2 feet of compacted clay and 6 inches of topsoil and turf reinforcement mat including the intended vegetative cover and the underlying soil such that erosion gullies and localized settlement do not occur;
- use of site boundaries to limit site access: wetlands and the Apple River form the northeastern, eastern, and southern boundaries and a railroad right-of-way and fencing along the western boundary of the site; and,
- signs and engineered cap delineation posts are installed along the boundary of the site.

Based on the Final Second Five-Year Review Report for Savanna Army Depot Activity Superfund Site, Savanna, Jo Daviess and Carroll Counties, Illinois, dated June 2020 (2nd FYR), the excavation, offsite disposal of soil, and installation of a vegetated engineered landfill cap have been completed. However, there are activities ongoing outside of the DEIS process, including that the UECA [Uniform Environmental Covenants Act] environmental covenants have not been executed. Groundwater monitoring is still ongoing.

- **Site 73 (Stables Landfill):**

According to the Final Record of Decision, Site 73 – Stable Landfill and Site 178 – Ordnance School Lake, Savanna Army Depot Activity, Savanna, Illinois, dated August 2016 (Sites 73 & 178 ROD), the selected remedy for Site 73 includes “[R]emoval and disposal of bulk debris and drums as nonhazardous waste following appropriate characterization; excavation of soil containing COCs [contaminants of concern] at concentrations above the

⁷ “Ordnance School Lake,” “Ordnance Lake,” and “Commander’s Pond” are the same body of water and are used interchangeably throughout this document. The usage is based upon the historical reference document.

remediation goals for residential use; transportation of the excavated debris and soil to a RCRA [Resource Conservation and Recovery Act] Subtitle D permitted facility (assuming the soil is nonhazardous); and, restoration of the site, which may include restoration of disturbed wetlands.”

Based on the 2nd FYR, “Remedial action was completed in December 2018 and the completion report is in the final stages. Site meets requirements for unrestricted use.”

- **Site 178 (Ordnance School Lake also known as Commander’s Pond):**

According to the Sites 73 & 178 ROD, the selected remedy for Site 178 includes “[E]xcavation of outfall surface soil and sediment along the western shoreline containing COCs at concentrations above recreational remediation goals; transportation of excavated material to a RCRA Subtitle D permitted facility for disposal (assuming the material is nonhazardous); site restoration, including regrading and/or bank stabilization; implementation of administrative LUCs (e.g., zoning laws) to maintain recreational or industrial/commercial use of the property; development of a Land Use Control Implementation Plan (LUCIP) to document strategies for implementing, maintaining, monitoring, and enforcing LUCs at the site; and, periodic monitoring of the LUCs conducted annually and as part of CERCLA 5-year reviews; in the event that the site changes land use designation, the 5-year review will be used as a mechanism to determine if the site conditions require a modification or amendment to the site controls.”

Based on the 2nd FYR, “[E]xcavation and offsite disposal was conducted in December 2018. LUC Implementation Plan (LUCIP) is under review. LUCs need to be implemented.”

- **Site 77 (1917-Era Powder Magazines) and Site 130 (Vincent Road Septic System):**

Sites 77 and 130 were initially evaluated and determined not to require further investigation or remediation.

Recommendations for the DEIS:

1. Given the status of the CERCLA sites above, EPA has identified the following considerations⁸ with regard to information contained in the scoping request and the Parcel 20 Reuse Plan:

The Scoping Request and the Parcel 20 Reuse Plan did not discuss how LUCs will be implemented and maintained under the conceptual redevelopment alternatives. As such, it is unclear if any of the three proposed reuse alternatives presented in the Parcel 20 Reuse Plan would impact the implementation of required LUCs that are established in the respective RODs for Sites 20 and 178. For example, the Parcel 20 Reuse Plan states, “The existing landfill area has potential space for a public gathering area and may include parking, recreational fields, a dog park, and gathering spaces such as picnic tables or gazebos;” however, there is no mention of the Site 20 Land Use Control Implementation Plan (LUCIP) LUCs to “Protect human receptors from

⁸ The issues and recommendations provided herein do not represent a comprehensive regulatory and permitting review of the Parcel 20 Reuse Plan. Should the property be transferred, the EPA and other appropriate parties should be contacted regarding pertinent regulations and permitting requirements.

contact with the soil COCs and the landfill waste. Maintain the site in accordance with the Operation and Maintenance Plan and as required by 35 Illinois Administrative Code [IAC] 811.111” or “Prohibit unauthorized intrusive activity into or excavation of the landfill cap” in the scoping request or Parcel 20 Reuse Plan. Further, the Site 178 (Ordnance School Lake) LUCIP is still under development and has yet to be reviewed and approved by regulators. We recommend that the DEIS discuss LUCs.

- a) Section 3.4 [Ordnance and Explosives (OE) and Munitions Debris (MD)] of the Parcel 20 Reuse Plan indicates that Sites 20 and 73, “were confirmed disposal areas for munitions constituents based on historical contamination detected in the landfills, and uncontrolled dumping of munitions and munitions constituents may have occurred throughout Parcel 20.” However, the scoping request and Parcel 20 Reuse Plan do not discuss how potential exposure to munitions and munitions constituents will be mitigated. This is of particular concern given the proposed recreation areas and proposed recreational trails included in the conceptual redevelopment alternatives. We recommend that the DEIS discuss such mitigation.
 - b) The scoping request states, “Since publishing its reuse plan, the LRA also has indicated its interest in an interim use lease agreement and/or an early transfer agreement that would allow construction of a solar energy facility atop the capped landfill within LRA Parcel 20;” however, no further details were provided. For example, it is unclear how the construction of a solar energy facility atop the capped landfill at Site 20 will meet the Site 20 LUCIP LUCs to “Protect human receptors from contact with the soil COCs and the landfill waste. Maintain the site in accordance with the Operation and Maintenance Plan and as required by 35 Illinois Administrative Code [IAC] 811.111” or “Prohibit unauthorized intrusive activity into or excavation of the landfill cap.” We recommend that the DEIS discuss such proper site maintenance.
 - c) Based on Sections 8.2 (Alternative 2: Commander’s Pond Lite) and 8.3 (Alternative 3: Commander’s Pond Full) of the Parcel 20 Reuse Plan, the conceptual redevelopment alternatives would require approximately 18 to 42 acres to be dredged including areas previously remediated. However, the cost and dredging estimates in Sections 9.2 (Cost Estimates) and 9.3 (Dredging Estimate) of the Parcel 20 Reuse Plan do not include details or costs associated with the management, characterization, or disposal of these dredged sediments. Constituents of concern at Site 178 previously included polynuclear aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), pesticides, and heavy metals. As such, it is unclear if the level of effort needed to dredge Site 178 has been sufficiently estimated. We recommend that the DEIS include an analysis of such costs.
2. To date, the five CERCLA sites associated with LRA Parcel 20 have not been investigated for per- and polyfluoroalkyl substances (PFAS) contamination. As such, it is unclear if the conceptual redevelopment alternatives and associated costing are sufficiently representative should a PFAS remedial action be warranted. We recommend that the DEIS consider how the alternatives would be affected if a PFAS remedial action is undertaken. Assuming the Parcel 20 Reuse Plan will be an appendix to a future DEIS, ensure that revisions to the Parcel 20 Reuse Plan include detailed information regarding the implementation of LUCs under the conceptual redevelopment alternatives, following regulatory approval of the LUCIP for Site 178.

3. Ensure the Parcel 20 Reuse Plan clarifies how potential exposure to munitions and munitions constituents will be mitigated.
4. Revise the Parcel 20 Reuse Plan to include information about all conceptual redevelopment alternatives and provide the plans that ensure that any solar facility components installed on the landfill cover will not adversely affect the final cover system.
5. Revise the Parcel 20 Reuse Plan to discuss the management, characterization, and disposal of all sediments to be dredged, and include a discussion on the sediments' impact on costs and schedule. This plan should also include additional characterization of the non-remediated portions of Commander's Pond.
6. Ensure the Parcel 20 Reuse Plan discusses how potential exposure to PFAS will be characterized and potentially mitigated given the lack of PFAS characterization of the sites.

3. **AQUATIC RESOURCES**

- A. The scoping information indicates that Parcel 20 provides 1) accessibility to water, roads, and rail, demonstrating access for port-related development, and 2) drains into creeks and sloughs of the Apple and Mississippi Rivers, replenishes groundwater supplies via low areas on the site, and contains bottomland forest. Due to its location on the landscape, it is likely that Parcel 20 contains wetlands and streams. Placing fill into wetlands or streams and/or relocation of or encapsulation of streams may trigger Clean Water Act Section 404 permitting and the need for CWA Section 401 water quality certification from the Illinois EPA.

Recommendations for the DEIS:

1. Before the DEIS is released for public review and comment, the following should be completed:
 - a) Complete a formal wetland and Waters of the U.S. delineation to know definitively where wetlands, streams, and other regulated Waters of the U.S. are located. EPA recommends that this delineation is included in (as an appendix to) the DEIS. The DEIS should provide accurate information on impacts to regulated water resources as well as information on how those impacts will be mitigated.
 - b) Determine ownership of Brickhouse Slough and Apple River.
2. Identify acreage for both direct (e.g., permanent fill, access roads, etc.), indirect (e.g., changes in hydrology, etc.), and temporary (e.g., temporary fill, staging areas, etc.) impacts to regulated water resources, including wetlands, for each action alternative. Understanding that plans have not yet been developed, using a range to identify impacts would be useful to understand potential impacts (e.g., anticipate 100-150 acres of wetland impact).
3. Disclose how sequencing established by the CWA Section 404(b)(1) Guidelines, namely, avoidance first, followed by demonstration of impact minimization, and mitigation for unavoidable impacts was applied to determine aquatic impacts. The Least Environmentally Damaging Practicable Alternative (LEDPA) alternative(s) should be

clearly identified.⁹ Consider proximity to USFWS Upper Mississippi River National Wildlife & Fish Refuge and the Mississippi River.

4. Discuss potential wetland and stream mitigation requirements, if applicable.
 5. Include baseline water quality information. Discuss impairments¹⁰ precluding meeting water quality standards and analyze how the proposed project, including all alternatives and the No Action Alternative, could affect the listing of waterbodies (both positively and negatively).
 6. Describe proposed measures to capture and filter stormwater runoff, preliminary drainage design, and proposed stormwater filtration for proposed infrastructure.
 7. Describe potential erosion impacts caused by barge fleeting.
- B. A floodplain determination study¹¹ should be conducted prior to the DEIS. If the project is determined to be within a mapped floodplain, project modifications to critical infrastructure placement or other modifications may be required.

Recommendation for the DEIS:

1. Identify portions of the project area identified as 100-year floodplain.
2. Analyze effects to downstream hydrologic flows as a result of building within the 100-year floodplain and the potential for increased downstream flooding.
3. Identify design elements that will allow the proposed project to be built safely within a 100-year floodplain, if applicable.

4. SEDIMENT SAMPLING/MANAGEMENT

- A. The quality of sediments will need to be evaluated in accordance with the joint USEPA/USACE Great Lakes Dredged Material Testing and Evaluation Manual (1998) and Evaluation of Dredged Material Proposed for Discharge in Waters of the U.S.—Testing Manual (1998). If sediment is determined to be clean enough for beneficial re-use, EPA strongly recommends various re-use options are evaluated in the DEIS.

Recommendations for the DEIS:

1. Before the DEIS is released for public review and comment, sediment testing should be completed and submitted to USACE. Sampling points should cover potentially-disturbed areas (e.g., Ordnance Lake, Brickhouse Slough, and Apple River). EPA strongly recommends the DEIS include an exhibit showing sampling points for potentially-disturbed areas (e.g., Ordnance Lake, Brickhouse Slough, and Apple River).
2. Provide results of sediment testing as an appendix to the DEIS. Discuss the quality of sediments and placement options based on sediment testing results (e.g., contaminated versus uncontaminated materials).
3. Quantify the amount of sediment that will need to be dredged initially to launch the project (e.g., Ordnance Lake, Brickhouse Slough, and Apple River).

⁹ The CWA Section 404(b)(1) guidelines call for the Least Environmentally Damaging Practicable Alternative (LEDPA) to be selected to address impacts to wetlands, streams, and other waters of the United States.

¹⁰ Impacts to CWA Section 303(d)-listed water bodies.

¹¹ <https://msc.fema.gov/portal/home>

4. Discuss the amount and frequency of maintenance dredging (e.g., for at least 20 years)¹² that will be required to maintain a 9-foot deep channel leading into and within Ordinance Lake, Brickhouse Slough, and Apple River. USACE dredging during normal weather patterns will likely serve as a guide. Identify where dredged materials from normal maintenance will be placed based on testing results.
5. Discuss recent flood events on the Mississippi River (e.g., last 20-30 years), as well as anticipated changes in frequency and magnitude of such events. Discuss the quantity of sediment¹³ that may need to be dredged based on recent and anticipated flooding events and where the dredged materials will be placed.
6. Discuss the impacts to USACE infrastructure (e.g., wing dams, closing dams, etc.) and commercial navigation from dredging activities as well as barge access. Discuss the impacts to barge traffic and shorelines caused by barge fleeting or mooring.
7. Discuss where dredged materials will be staged for dewatering. Consider whether different processes will be needed for contaminated versus uncontaminated dredged materials, if applicable.
8. If contaminated material needs to be dredged, discuss potential placement locations and transportation plan to move contaminated material (e.g., number of trucks, hauling routes, etc.).
9. Discuss opportunities for beneficial re-use of dredged materials. Include information describing potential transport options for re-use materials.
10. Include results of communication with Illinois EPA regarding effluent testing and compliance requirements. USEPA recommends that copies of correspondence with state agencies are included in the DEIS.

5. **AIR RESOURCES AND EMISSIONS IMPACTS**

- A. LRA's finalized 2023 reuse plan alternatives would result in emissions from dredging and construction equipment in addition to ongoing emissions from the operation and maintenance of the commercial and industrial inland commodities shipping facility. Even temporary construction emissions have the potential to impact human health, especially in sensitive populations, such as the elderly, children, and those with impaired respiratory systems. In 2002, EPA classified diesel emissions as a likely human carcinogen, and in 2012 the International Agency for Research on Cancer concluded diesel exhaust is carcinogenic to humans.¹⁴ Diesel exhaust can worsen heart and lung disease, especially in vulnerable and sensitive populations.

Recommendations for the DEIS:

1. Discuss the current air quality in the project area. Indicate whether the project area is in non-attainment and/or maintenance status for any National Ambient Air Quality Standard.
2. Discuss potential emissions and impacts expected from implementation of the land transfer and potential reuse. Consider equipment used for construction, such as barges,

¹² https://www.publications.usace.army.mil/portals/76/publications/engineermanuals/em_1110-2-5025.pdf, pg. 46.

¹³ Provide an average amount based on recent flood events on the Mississippi River.

¹⁴ For more information on EPA's classification, see https://iris.epa.gov/ChemicalLanding/&substance_nmbr=642.

truck trips, and hauling of materials, as well as operation and maintenance of shipping facilities.

3. Quantify estimates of all reasonably-foreseeable direct (e.g., construction and operation) and indirect (e.g., off-site material hauling and disposal) emissions from the proposed Project over its anticipated lifetime for all alternatives, including the No Action Alternative, broken out by emission type. EPA recommends, consistent with NEPA, that all regulated air pollutants, including criteria pollutants, air toxic and GHGs be addressed as applicable.
4. Ensure the DEIS clearly states the period of operational emissions used in calculations (i.e., the length of the Project life or Project contract(s)). Clearly disclose the scenario under which operational emissions estimates are made.
5. Discuss whether the emissions from the proposed project, and any cumulative emissions, are likely to impact the NAAQS or air toxics standards or the project would impact the ability of Illinois to meet GHG reduction provisions.
6. Identify and discuss specific measures to reduce construction, operation and maintenance emissions, and how such mitigation can be achieved in practice, such as through contracts, permit conditions, and Memorandum of Understanding. EPA recommends DoA consider: (1) requiring dust suppressant strategies, such as watering soils; (2) limiting and enforcing idling time for construction trucks and heavy equipment; (3) soliciting bids that require low-emission technologies or advanced emission control systems and 4) developing a construction traffic management plan that ensures trucks hauling materials and heavy machinery avoid areas where children congregate within adjacent neighborhoods, and when possible, route construction traffic away from schools, daycare facilities, and parks, using crossing guards when such area cannot be avoided. In addition to air quality benefits, careful routing may protect children from vehicle-pedestrian accidents. Additional best practices are identified in the enclosed Appendix A Construction Emission Control Recommendations.

6. **PROJECT DESIGN / PROJECT STAGING**

- A. Careful project design and staging could minimize impact and reduce permitting requirements while increasing safety and efficiency.

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Recommendations for the DEIS:

1. Consider impacts to existing infrastructure (e.g., drinking water intake locations, sewer/septic, utilities, stormwater and effluent discharge point sources, existing public and private piers, and boat ramps) and how construction would impact or otherwise affect this infrastructure.
2. Consider potential effects to water quality due to dredging, construction activities, and in-water work (e.g., sediment curtains, turbidity monitors, silt fencing, etc.). Include information about specific tools or mitigation measures that are typically used to protect water quality during these activities.
3. Ensure that the wetland delineation to be undertaken includes all staging locations and that all staging and access road areas are investigated for the presence of regulated water resources.

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4. Provide maps and figures showing all contractor staging locations, access routes, and temporary road/mobilization locations, including areas of work within waterways.
5. Provide information pertaining to coordination with relevant state resource agencies regarding required permitting as well as any required mitigation for proposed work.

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7. SOCIOECONOMIC IMPACTS AND PUBLIC INVOLVEMENT

- A. Consideration of the human environment is within the scope of NEPA's purpose to assure all Americans have access to safe, healthful, productive, and esthetically- and culturally-pleasing surroundings.¹⁵ The LRA's finalized 2023 reuse plan includes a demographic and economic analysis and details public involvement efforts. From 2010 to 2020, population changes for Savanna, Carroll and Jo Daviess counties declined for the population under age 60 and increased for population above 60 years old.¹⁶ Public and technical advisory committee input during the LRA plan development identified redevelopment priorities to include sustainable development, job creation, port/multi-modal development, economic development, recreation, and conservation.¹⁷ Economic impact analysis of the alternatives identified the proposed alternatives would result regional benefits of 370 direct, indirect, and tertiary person-year jobs under the preferred alternative for redevelopment of Parcel 20.¹⁸ The forthcoming DEIS should analyze if the Project actions (or the alternatives, including the No Action Alternative) will significantly affect local communities and/or Tribes.

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Recommendations for the DEIS:

1. Federal agencies should analyze socioeconomic, human health, and environmental effects based on the best available science and information on effects arising from exposure to pollution and other environmental hazards.
 - a) Disclose demographic information and identify the presence of communities that could experience adverse socioeconomic, human health, or environmental effects from the proposed Project.
 - b) Include an analysis and conclusion regarding whether the proposed Project or any action alternatives, including the No Action Alternative, may have potentially significant adverse effects on local communities.
 - c) Disclose existing and projected changes in population, housing, and economic conditions in the project area and surrounding region in the affected environment. Describe how these changes may alter environmental conditions, including any possible changes in traffic, noise, and other effects.
 - d) Describe how projected increase in jobs from the proposed project may affect population growth, housing stock, and health and environmental conditions in the area.

¹⁵ See 42 U.S.C. § 4331(2).

¹⁶ Section 4.3, Population, Jo Carroll Depot Local Redevelopment Authority Final Reuse Plan for Parcel 20, June 2023.

¹⁷ Section 7.2.6, Public and TAC Input, Jo Carroll Depot Local Redevelopment Authority Final Reuse Plan for Parcel 20, June 2023.

¹⁸ Section 9.4, Economic Impact, Jo Carroll Depot Local Redevelopment Authority Final Reuse Plan for Parcel 20, June 2023.

- B. Outreach and public engagement are underlying pillars of NEPA. Given that the proposed Project's activities would affect the local community, EPA anticipates the forthcoming DEIS will detail DoA's approach to solicit public comments from those who may be affected by the proposed action.

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Recommendations for the DEIS:

1. Describe public involvement and targeted outreach¹⁹ to seek public comment from communities within and adjacent to the Project area. EPA recommends DoA conduct outreach in plain language and languages other than English spoken by residents and workers in and/or near the Project area. Consider local knowledge and linguistically-isolated populations within the Project area.
2. Seek input regarding proposed mitigation measures and incorporate additional measures identified through public engagement with communities. For any significant adverse effects identified, consider mitigation measures consistent with NEPA.

8. RESILIENCY AND ADAPTATION:

- A. Given the significant infrastructure investment of this project, consideration of the impacts of climate, such as increased temperature and extreme weather events, on the project are important considerations for facility design.

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Recommendations for the DEIS:

1. Consider the environmental effects of the proposed project (e.g., the potential of a proposed action to exacerbate or mitigate flooding events and the associated release and/or containment of newly exposed contaminants; assessment of emissions and reductions from the proposed action, as described in the air resources section above).
2. Describe changing conditions (e.g., temperature and frequency and severity of storm events) and assess how such changes could affect the proposed project and all identified alternatives.
3. Discuss the implications of the expected increase in GHGs should the proposed project be implemented. Additionally, discuss the ramifications of making it more difficult to meet state emissions goals due to the increase in GHGs.
4. Include a comparison of the effects of extreme weather events (e.g., temperature and frequency and severity of storm events) on the proposed action the No Action alternative, and other action alternatives carried forward for analysis.
5. Identify and evaluate practices to reduce and mitigate the expected emissions from the proposed project (e.g., barge and truck emissions). EPA recommends practices enclosed in the Construction Emission Control Recommendations. Mitigation measures may also include, for example, reforestation of land to offset projected emissions associated with the alternatives.
6. Incorporate robust resilience and risk reduction considerations into: (1) project design and engineering; (2) construction oversight; (3) commitments for protective measures related to stormwater and erosion; and (4) routine monitoring during operations.

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¹⁹ Consider engaging the public early and often, proactively seek full representation from the community, consider public comments and feedback, incorporate feedback into the project.

9. **ENERGY EFFICIENCY AND ENVIRONMENTAL BEST PRACTICES**

- A. Energy-efficient design and material selection could reduce operations costs and promote a high-quality work environment, while also better protecting the environment. Recycling construction debris also preserves valuable landfill space and makes use of materials that have high embodied energy.

Recommendations for the DEIS:

1. Examine whether any new buildings associated with the project can achieve Leadership in Energy & Environmental Design (LEED) certification at the platinum level (or design for net-zero energy usage). Best practices for energy efficiency and sustainable building design can include the use of energy-efficient building materials, such as south-facing skylights and windows, motion-sensored lighting, solar, wind, and/or geothermal power, and Energy Star certified windows and doors. In addition to reducing the overall environmental footprint, green building certification programs promote health by encouraging practices that protect indoor air quality. At a minimum, EPA encourages DoA to analyze the strengths and feasibility of these strategies.
2. Discuss whether proposed roads, parking lots, sidewalks, or other surfaces slated for driving or walking can incorporate permeable pavement or porous pavers to reduce runoff. Effectively treating stormwater runoff is particularly important, considering the aquatic resources in the area.
3. Identify opportunities for additional green stormwater management practices. Opportunities include, but are not limited to, green roofs, bioswales, and rain gardens.
4. Identify opportunities to convert areas around buildings associated with the project²⁰ to native habitats, increasing the area which can be beneficially used for pollinators, stormwater infiltration or detention, and aesthetics, among other functions.
5. Consider recycling a high percentage of construction and demolition debris.
6. Replacing raw materials with recycled materials for infrastructure components. Options include, but are not limited to:
 - a) Using recycled materials to replace carbon-intensive Portland Cement in concrete as “supplementary cementitious material”;
 - b) Using tire-derived aggregate in lightweight embankment fill and retaining wall backfill; and
 - c) Using recycled materials in pavement applications, such as crushed recycled concrete, recycled asphalt pavement, and rubberized asphalt concrete. Also, in some circumstances, demolished onsite asphalt can be re-used (e.g., cold in-place recycling or full depth reclamation).

10. **NATURAL FEATURES**

- A. The Refuge borders Parcel 20 on three side that includes all water access routes to the Mississippi River. It appears that proposed re-use will extend into Refuge lands, where Federally-listed species have been documented.

²⁰ Areas not planned for operations.

Recommendations for the DEIS:

1. Discuss coordination with the U.S. Fish and Wildlife Service regarding potential impacts to the USFWS Upper Mississippi River National Wildlife & Fish Refuge and whether proposed activities are compatible uses of Refuge lands and waters. Consider activities associated with construction (e.g., installing utilities on Refuge lands) as well as operation of proposed features.
 2. Quantify the acreage of trees that would need to be removed in the project area. Develop a disposal management plan to address tree trunks removed from the landscape. Rather than burning trees, consider offering the trees to the community (e.g., chipping trees for community use, etc.). EPA recommends trees should not be burned due to negative air impacts. If trees must be burned, the Illinois Pollution Control Board and the IEPA regulate open burning.
 3. Discuss voluntary tree replacement. EPA recommends the LRA commit to voluntary tree mitigation at a 1:1 ratio. Working with USFWS and/or the Illinois Department of Natural Resources would help provide suitable native species and planting locations.
 4. Coordinate with USACE to discuss potential impacts to Rock Island District's rehabilitation and enhancement projects currently in the feasibility stage.²¹ Evaluate how the proposed project would support the goals, objectives, and actions of USACE projects and well as water quality goals and commitments of Illinois.
 5. Discuss potential impacts to local, state, and/or Federal habitat connectivity and/or restoration projects underway or reasonably foreseeably in Pool 13 of the Mississippi River.
- B. Section 7 of the Endangered Species Act directs all Federal agencies to ensure that any action they authorize, fund, or carry out will not jeopardize the continued existence of a Federally threatened or endangered species or to proposed or designated critical habitat for an identified species. Additionally, the Fish and Wildlife Coordination Act²² requires that agencies consult with the USFWS and State wildlife agencies concerning the conservation of wildlife resources where the water or any stream or other water body is proposed to be controlled or modified by a Federal agency or any public or private agency operating under a Federal permit.

USFWS's Information for Planning and Consultation²³ tool can be used to identify potential Federally- listed endangered, threatened, and candidate species (along with any essential experimental species populations) within the Project area. IPaC can also be used to determine if Migratory Birds of Conservation Concern²⁴ maybe found within the Project area.

Recommendations for the DEIS:

1. Discuss potential impacts to Federally- and state-listed threatened or endangered species. The fact that critical habitat is not designated for all listed species does not

²¹ Projects in feasibility phase: Steamboat Island, Lower Pool 13, and Green Island. See [Rock Island District](#).

²² 16 U.S.C. §661-666(e); PL 85-624. See <https://www.fws.gov/law/fish-and-wildlife-coordination-act>.

²³ The USFWS hosts the IPaC tool as a planning project tool to assist with the environmental review process, <https://ipac.ecosphere.fws.gov/>.

²⁴ Birds of Conservation concern are species, subspecies, and populations of all migratory nongame birds that, without additional conservation actions, are likely to become candidates for listing under the Endangered Species Act. See: <https://www.fws.gov/program/migratory-birds/species>.

equate to an analysis of potential impacts to the species themselves as a result of the proposed re-use plan. In particular, consider impacts to mussel species from dredging, barge traffic, spills, etc.

2. Discuss coordination in compliance with the Fish and Wildlife Coordination Act. Include results of coordination, concurrences, and stipulations with the USFWS and Illinois Department of Natural Resources regarding Federally- and State-listed species in the forthcoming DEIS.
3. Discuss potential effects to the migratory bird breeding season and habitat connectivity in the project area.
4. Include commitments to adhere to all USFWS and ILDNR recommendations to protect species, including, but not limited to, seasonal restrictions for in-water work.

11. NON-NATIVE INVASIVE SPECIES (NNIS)

- A. Based on the proximity of the project area to the Refuge and the Mississippi River, the potential for the proposed project to spread terrestrial and aquatic NNIS is high. Care needs to be taken to reduce the spread of NNIS during project planning and implementation.

Recommendations for the DEIS:

1. Provide baseline information regarding the current locations and acreages of terrestrial and aquatic NNIS in the project area.
2. Discuss how the project will comply with Executive Order 13112 – Safeguarding the Nation from the Impacts of Invasive Species. Include a discussion of standard best management practices (e.g., washing construction equipment) that will be used to eliminate the spread of terrestrial and aquatic NNIS into, as well as out of, the project area.
3. Discuss how Illinois' guidelines for terrestrial and aquatic NNIS will be incorporated into the project²⁵.
4. Assuming NNIS are present in the project area, discuss measures that can be taken to control or eradicate existing populations, ideally before earthmoving activities begin (e.g., washing equipment).

12. REASONABLY-FORESEEABLE ENVIRONMENTAL EFFECTS

- A. Development along the Mississippi River has a lengthy history. The impacts resulting from the proposed action's incremental impacts when added to the impacts of other past, present, and reasonably-foreseeable future actions, regardless of what agency (Federal or non-Federal) undertakes such actions should be analyzed.²⁶

Recommendations for the DEIS:

1. Discuss potential reasonably-foreseeable environmental effects to resources in the

²⁵ <https://dnr.illinois.gov/conservation/iwap/invasivespecies.html>

²⁶ See 42 U.S.C. § 1508.1.

project area that could be affected by the proposed project (e.g., USFWS Refuge and the Mississippi River).

2. Consider reasonably-foreseeable environmental effects as a result of the proposed project (e.g., existing roadway improvements to transport off-loaded materials to nearest high traffic roadway; impacts to existing rail operations; induced growth in the form of convenience stores, gas stations, etc.). Regional or county-wide smart growth or land use plans should inform the discussion of induced growth.

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13. HISTORIC AND CULTURAL RESOURCES

- A. The National Historic Preservation Act and NEPA are independent statutes, yet may be executed concurrently to optimize efficiencies, transparencies, and accountability to better understand the effects to the human, natural, and cultural environment as a result of the proposed Project.

Recommendations for the DEIS:

1. Document coordination and input received from the State Historic Preservation Office and Tribal Historic Preservation Office, if applicable, and Tribes who may have cultural or religious associations with the area, under Section 106 of the NHPA.
2. Discuss how each alternative may affect historical or archeological resources, including historic properties that are listed on the National Register of Historic Properties or eligible for listing. Explain how DoA has and will continue to address input received from the SHPO, THPO, and Tribes.
3. Describe the process that will be used for (1) addressing inadvertent discoveries (e.g., Tribal remains, artifacts, other culturally or historically sensitive items) and, (2) complying with the Native American Graves Protection and Repatriation Act and the Archaeological Resources Protection Act, as applicable.

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14. INTERAGENCY COORDINATION / PERMITTING

- A. Implementation of NEPA requires interagency coordination with multiple stakeholders, including Federal and state resource agencies, Tribes, local governments, and affected landowners. For all environmental impact categories requiring coordination with other Federal and state resource agencies, EPA recommends copies of DoA's letters to those agencies, as well as the responses from those agencies, are provided as appendices to the DEIS.

Recommendations for the DEIS:

1. Include copies of all interagency coordination sent to, and received from Federal and state resource agencies, Tribes, and local municipalities.
2. Include a list of all Federal, state, and local permits that would be required to undertake the Preferred Alternative (e.g., ownership transfer Apple River Island, Refuge property, etc.).
3. Describe permitting/mitigation process and responsibilities if parcel is transferred.

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15. **OTHER COMMENTS**

- A. The DEIS should indicate how comments received during the scoping period were addressed.

Recommendations for the DEIS:

1. Create an appendix that includes all comments received during the DEIS scoping period, including any applicable transcripts of comments from the public.
2. Create an appendix that includes all correspondence sent to and received from government agencies regarding the proposed project.
3. Create a chart that lists the following:
 - a) all comments received during the scoping and DEIS review periods;
 - b) DoA's response with a reference to the DEIS section that was changed as a result of the comment, if applicable. Include section and page number for ease of reference; and
 - c) associated mitigation efforts with responsible entity.
4. Create a chart listing proposed mitigation and clarify which features will become a commitment.
5. EPA recommends all technical terms be explained in plain language.
6. EPA recommend DoA access the following databases to obtain environmental information related to the project area:
 - a) WATERS²⁷: <https://www.epa.gov/waterdata/waters-watershed-assessment-tracking-environmental-results-system>
 - b) Envirofacts²⁸: <https://www3.epa.gov/enviro/facts/multisystem.html>
 - c) NEPAassist: <https://www.epa.gov/nepa/nepassist>
 - d) CWA 303(d) Listed Impaired Waters: <https://epa.illinois.gov/topics/water-quality/watershed-management/tmdls/303d-list.html>
 - e) National Ambient Air Quality Standards status: https://www3.epa.gov/airquality/greenbook/anayo_il.html

²⁷ The Watershed Assessment, Tracking & Environmental Results System (WATERS) unites water quality information previously available only from several independent and unconnected databases.

²⁸ Includes enforcement and compliance information.

APPENDIX A
U.S. Environmental Protection Agency
Construction Emission Control Recommendations

Diesel emissions and fugitive dust from project construction may pose environmental and human health risks and should be minimized. In 2002, EPA classified diesel emissions as a likely human carcinogen, and in 2012 the International Agency for Research on Cancer concluded that diesel exhaust is carcinogenic to humans. Acute exposures can lead to other health problems, such as eye and nose irritation, headaches, nausea, asthma, and other respiratory system issues. Longer term exposure may worsen heart and lung disease.²⁹ We recommend DoA consider the following protective measures and commit to applicable measures in the DEIS.

Mobile and Stationary Source Diesel Controls

Purchase or solicit bids that require the use of vehicles that are equipped with zero-emission technologies or the most advanced emission control systems available. Commit to the best available emissions control technologies for project equipment in order to meet the following standards.

- On-Highway Vehicles: On-highway vehicles should meet, or exceed, the EPA exhaust emissions standards for model year 2010 and newer heavy-duty, on-highway compression-ignition engines (e.g., long-haul trucks, refuse haulers, shuttle buses, etc.).³⁰
- Non-road Vehicles and Equipment: Non-road vehicles and equipment should meet, or exceed, the EPA Tier 4 exhaust emissions standards for heavy-duty, non-road compression-ignition engines (e.g., construction equipment, non-road trucks, etc.).³¹
- Marine Vessels: Marine vessels hauling materials for infrastructure projects should meet, or exceed, the latest EPA exhaust emissions standards for marine compression-ignition engines (e.g., Tier 4 for Category 1 & 2 vessels, and Tier 3 for Category 3 vessels).³²
- Low Emission Equipment Exemptions: The equipment specifications outlined above should be met unless: 1) a piece of specialized equipment is not available for purchase or lease within the United States; or, 2) the relevant project contractor has been awarded funds to retrofit existing equipment, or purchase/lease new equipment, but the funds are not yet available.

Consider requiring the following best practices through the construction contracting or oversight process:

- Use onsite renewable electricity generation and/or grid-based electricity rather than diesel-powered generators or other equipment.
- Use electric starting aids such as block heaters with older vehicles to warm the engine.
- Regularly maintain diesel engines to keep exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance (e.g., blue/black smoke indicates that an engine requires servicing or tuning).

²⁹ Benbrahim-Tallaa, L, Baan, RA, Grosse, Y, Lauby-Secretan, B, El Ghissassi, F, Bouvard, V, Guha, N, Loomis, D, Straif, K & International Agency for Research on Cancer Monograph Working Group (2012). Carcinogenicity of diesel-engine and gasoline-engine exhausts and some nitroarenes. The Lancet. Oncology, vol. 13, no. 7, pp. 663-4. Accessed online from:

https://kclpure.kcl.ac.uk/portal/files/6492297/coverBenbrahim_Tallaa_2012_Lancet_Oncology.pdf

³⁰ <https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-heavy-duty-highway-engines-and-vehicles>

³¹ <https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-nonroad-engines-and-vehicles>

³² <https://www.epa.gov/emission-standards-reference-guide/all-epa-emission-standards>

- Where possible, retrofit older-tier or Tier 0 nonroad engines with an exhaust filtration device before it enters the construction site to capture diesel particulate matter.
- Replace the engines of older vehicles and/or equipment with diesel- or alternatively-fueled engines certified to meet newer, more stringent emissions standards (e.g., plug-in hybrid-electric vehicles, battery-electric vehicles, fuel cell electric vehicles, advanced technology locomotives, etc.), or with zero emissions electric systems. Retire older vehicles, given the significant contribution of vehicle emissions to the poor air quality conditions. Implement programs to encourage the voluntary removal from use and the marketplace of pre-2010 model year on-highway vehicles (e.g., scrappage rebates) and replace them with newer vehicles that meet or exceed the latest EPA exhaust emissions standards, or with zero emissions electric vehicles and/or equipment.

Fugitive Dust Source Controls

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative, where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
- Install wind fencing and phase grading operations where appropriate and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

Occupational Health

- Reduce exposure through work practices and training, such as maintaining filtration devices and training diesel-equipment operators to perform routine inspections.
- Position the exhaust pipe so that diesel fumes are directed away from the operator and nearby workers, reducing the fume concentration to which personnel are exposed.
- Use enclosed, climate-controlled cabs pressurized and equipped with high-efficiency particulate air (HEPA) filters to reduce the operators' exposure to diesel fumes. Pressurization ensures that air moves from inside to outside. HEPA filters ensure that any incoming air is filtered first.
- Use respirators, which are only an interim measure to control exposure to diesel emissions. In most cases, an N95 respirator is adequate. Workers must be trained and fit-tested before they wear respirators. Depending on the type of work being conducted, and if oil is present, concentrations of particulates present will determine the efficiency and type of mask and respirator. Personnel familiar with the selection, care, and use of respirators must perform the fit testing. Respirators must bear a National Institute for Occupational Safety and Health approval number.

NEPA Documentation

- Per Executive Order 13045 on Children's Health,³³ EPA recommends the lead agency and project proponent pay particular attention to worksite proximity to places where children live,

³³ Children may be more highly exposed to contaminants because they generally eat more food, drink more water, and have higher inhalation rates relative to their size. Also, children's normal activities, such as putting their hands in their mouths or playing on the ground, can result in higher exposures to contaminants as compared with adults. Children may be more vulnerable to the toxic effects of contaminants because their bodies and

learn, and play, such as homes, schools, and playgrounds. Construction emission reduction measures should be strictly implemented near these locations in order to be protective of children's health.

- Specify how impacts to sensitive receptors, such as children, elderly, and the infirm will be minimized. For example, locate construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.

systems are not fully developed, and their growing organs are more easily harmed. EPA views childhood as a sequence of life stages, from conception through fetal development, infancy, and adolescence.



REGION 5

CHICAGO, IL 60604

August 26, 2024

VIA ELECTRONIC MAIL ONLY

Thomas Lineer, BRAC Program Manager
Department of the Army
Savanna Army Depot Activity
18935 B Street
Savanna, Illinois 61074

Re: EPA Scoping Comments for a Supplemental Environmental Impact Statement for the Implementation of Base Realignment and Closure Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois Carroll and Jo Davies Counties, Illinois

Dear Mr. Lineer:

The U.S. Environmental Protection Agency (EPA) has reviewed the Department of the Army's (DoA) August 8, 2024, early coordination request for reuse of a 132-acre parcel of the Savanna Army Depot Activity (SVAD) and expected subsequent reuse of this acreage. This letter provides EPA's comments on the early coordination request and Jo Carroll Depot Local Redevelopment Authority Final Reuse Plan for Parcel 20, Former Savanna Army Depot, dated June 2023 (hereinafter the Parcel 20 Reuse Plan), pursuant to our authorities under the National Environmental Policy Act (NEPA), the Council on Environmental Quality's (CEQ) NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

The SVAD site is a 13,062-acre former DoA installation located on the eastern bank of the Mississippi River, 9 miles north of Savanna, Illinois. Between 1917 and 1995, the DoA used the property for artillery weapons and ammunition testing, storage of ordnance, and the loading and renovating of shells and bombs. The 1995 Base Realignment and Closure (BRAC) Commission recommended closure of SVAD. A 1997 environmental impact statement (EIS) evaluated the closure, and the SVAD was officially closed in 2000. The forthcoming Supplemental Draft EIS (SDEIS) will supplement the 1997 EIS. The DoA has been conducting environmental remediation to clean-up surplus property in preparation for eventual property transfer.

On January 17, 2018, the DoA published notice in the Federal Register indicating surplus property was available at SVAD for public benefit purposes and that the Jo Carroll Depot Local Redevelopment Authority (LRA) had been recognized by the Department of Defense as the

Local Redevelopment Authority for this surplus property. The LRA performed an analysis (the Parcel 20 Reuse Plan) in support of reuse planning for LRA Parcel 20, which covers 132 acres, for DoA's use when preparing the NEPA scoping document.

The 132-acre parcel is undeveloped land sharing a border with the Upper Mississippi River National Wildlife and Fish Refuge, the Apple River, and a tributary of the Mississippi River. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast. The railway right-of-way and a sewage treatment plant surrounded by the 132-acre parcel and owned by the DoA are not part of the parcel to be transferred.

The LRA's finalized 2023 reuse plan presents three conceptual reuse alternatives for developing LRA Parcel 20, which focus on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development, under each alternative. Three conceptual alternatives for redevelopment of LRA Parcel 20 were identified in the scoping document as follows:

Alternative 1 (Brickhouse Slough) – This alternative prioritizes fleet¹ development of a dry bulk and liquid bulk wharf on the Brickhouse Slough and recreational use. Key port infrastructure includes a barge fleeting area, an 800-foot dry and liquid bulk wharf, a floating dry dock, a wharf access road, a haul road, a liquid bulk pipeline, and a conveyor system.

Alternative 2 (Commander's Pond Lite) – This alternative expands on Alternative 1 and adds a 600-foot lift-on/lift-off wharf to allow the handling of two 250-foot barges simultaneously to support expansion of specialty and breakbulk cargos and dry dock capacity. This concept would require approximately 18 acres of dredging within the Commander's Pond area to support access to Brickhouse Slough.

Alternative 3 (Commander's Pond Full) – This alternative expands on Alternative 2 and adds additional port support to include an additional 350-foot lift-on/lift-off wharf to allow the handling of two 250-foot barges simultaneously, a repair fleeting area, and the inclusion of an aquatic habitat restoration area. This concept would require approximately 42 acres of dredging within the Commander's Pond area with 26 acres to support cargo activities and the remaining 16 acres dedicated for aquatic habitat restoration. Alternative 3 is the LRA's preferred alternative as of November 27, 2023.

To facilitate implementation, the LRA designed the alternatives as sequential phases. Alternative 1 could be implemented within a target 5-year completion window, while Alternatives 2 and 3 could follow, with both having 5-year-plus completion windows. The LRA's proposed reuse plan includes activities outside the boundary of LRA Parcel 20.² Each of the LRA's reuse alternatives would require dredging.

¹ Fleeting would provide "parking areas" while cargo is being loaded/offloaded.

² In the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island.

Scoping information previously provided³ indicates the timing for capital expenditures is not fully established and will depend in large part on market interest and development participation by private partners as well as regulatory and permitting issues. To facilitate implementation, the alternatives are designed to phase into each other seamlessly and sequentially. For example, Alternative 1 could be initiated immediately with a target five-year completion window, while Alternatives 2 and 3 could follow in a five-year plus completion window.

According to the scoping information, the development of these parcels by the LRA could not occur if the land was not transferred to it by the DoA. NEPA regulations indicate connected actions are those actions that could not or would not occur but for another action (e.g., the proposed land transfer from DoA to LRA). Connected actions must be analyzed in the same NEPA document, because the environmental impacts generated from the non-DoA action would not occur but for the DoA action of transferring Parcel 20.⁴

EPA provided detailed NEPA scoping comments dated February 2, 2024 (see enclosed letter). Based on the November 27, 2023, scoping information, we understood a Draft Environmental Assessment would be developed. Our comments in this letter recommend the forthcoming SDEIS address our recommendations regarding Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) sites, impacts to wetlands and aquatic resources, project design and staging, environmental justice and children's health, climate change, energy efficiency and environmental best practices, natural features, non-native invasive species, cumulative impacts, permitting, and inter-agency coordination.

Thank you for the opportunity to review and provide comments on this project. Please contact the lead NEPA Reviewer, Kathy Kowal, via email at kowal.kathleen@epa.gov if you have any questions regarding the contents of this letter as well as to arrange inter-agency meetings concerning this project.

Sincerely,

**KRYSTLE
MCCLAIN**

Digitally signed by
KRYSTLE MCCLAIN
Date: 2024.08.26 10:29:43
-05'00'

Krystle Z. McClain, P.E.
NEPA Program Supervisor
Environmental Justice, Community Healthy, and
Environmental Review Division

Enclosures:

EPA Detailed Scoping Comments
Construction Emission Control Checklist
EPA's scoping letter dated February 2, 2024

(CCs continued on following page)

³ Dated November 27, 2023

⁴ 40 CFR 1501.3 (b)

CCs (with enclosures):

William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

Ed Britton, Upper Mississippi River National Wildlife and Fish Refuge

Jodi Creswell, U.S. Army Corps of Engineers, Rock Island District

Joe Hand, U.S. Army Corps of Engineers, Mobile District

Charlene Falco, Illinois Environmental Protection Agency

Bradley Hayes, Illinois Department of Natural Resources

Kraig McPeck, U.S. Fish and Wildlife Service

Nicole Goers, U.S. Environmental Protection Agency

EPA's Detailed Comments
Supplemental Environmental Impact Statement for the
Implementation of Base Realignment and Closure Disposal and
Reuse of LRA Parcel 20, Savanna Army Depot Activity
Illinois Carroll and Jo Davies Counties, Illinois

August 26, 2024

1. COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT (CERCLA)
SITES

A. LRA Parcel 20 includes CERCLA sites which were previously investigated [e.g., Site 20 (Abandoned Landfill), Site 73 (Stables Landfill), Site 77 (1917-Era Powder Magazines), Site 130 (Vincent Road Septic System), Shop Area (Buildings 100 through 129 Sanitary and Stormwater Sewer lines and Outfalls to Site 178 and Site 178 (Ordnance School Lake, also known as Commander's Pond)]. Based on information available to EPA, the current status of the CERCLA sites is as follows:

- **Site 20 (Abandoned Landfill):**

According to the *Final Record of Decision, Site 20 – Abandoned Landfill and Site 99 – Building 762, CF Plant Battery Shop and Leaching Pits, Savanna Army Depot Activity, Savanna, Illinois*, dated June 2016 (Site 20 Record of Decision (ROD)), the selected remedy included landfill capping with hotspot removal, long-term groundwater monitoring, and land use controls (LUCs). Based on the *Final Land Use Control Implementation Plan, Site 20 Abandoned Landfill, Savanna Army Depot Activity, Savanna, Illinois*, dated October 2019 (Site 20 LUCIP), the institutional and engineering controls for Site 20 include:

- environmental covenants to prohibit residential use, access to groundwater, and intrusive activities (including agricultural use) at the site;
- Illinois Environmental Protection Agency (Illinois EPA), DoA, and EPA review of LUC inspections and approval processes;
- maintenance of a vegetated engineered landfill cap constructed with at least 2 feet of compacted clay and 6 inches of topsoil and turf reinforcement mat including the intended vegetative cover and the underlying soil such that erosion gullies and localized settlement do not occur;
- use of site boundaries to limit site access: wetlands and the Apple River form the northeastern, eastern, and southern boundaries and a railroad right-of-way and fencing along the western boundary of the site; and,
- signs and engineered cap delineation posts are installed along the boundary of the site.

Based on the Final Second Five-Year Review Report for Savanna Army Depot Activity Superfund Site, Savanna, Jo Daviess and Carroll Counties, Illinois, dated June 2020 (2nd FYR), the excavation, offsite disposal of soil, and installation of a vegetated engineered landfill cap have been completed. However, the UECA [Uniform Environmental

Covenants Act] environmental covenants have not been executed. Groundwater monitoring is still ongoing.

- **Site 73 (Stables Landfill):**

According to the Final Record of Decision, Site 73 – Stable Landfill and Site 178 – Ordnance School Lake, Savanna Army Depot Activity, Savanna, Illinois, dated August 2016 (Sites 73 & 178 ROD), the selected remedy for Site 73 includes “[R]emoval and disposal of bulk debris and drums as nonhazardous waste following appropriate characterization; excavation of soil containing COCs [contaminants of concern] at concentrations above the remediation goals for residential use; transportation of the excavated debris and soil to a RCRA [Resource Conservation and Recovery Act] Subtitle D permitted facility (assuming the soil is nonhazardous); and, restoration of the site, which may include restoration of disturbed wetlands.”

Based on the 2nd FYR, “Remedial action was completed in December 2018 and the completion report is in the final stages. Site meets requirements for unrestricted use.”

- **Site 178 (Ordnance School Lake also known as Commander’s Pond):**

According to the Sites 73 & 178 ROD, the selected remedy for Site 178 includes “[E]xcavation of outfall surface soil and sediment along the western shoreline containing COCs at concentrations above recreational remediation goals; transportation of excavated material to a RCRA Subtitle D permitted facility for disposal (assuming the material is nonhazardous); site restoration, including regrading and/or bank stabilization; implementation of administrative LUCs (e.g., zoning laws) to maintain recreational or industrial/commercial use of the property; development of a Land Use Control Implementation Plan (LUCIP) to document strategies for implementing, maintaining, monitoring, and enforcing LUCs at the site; and, periodic monitoring of the LUCs conducted annually and as part of CERCLA 5-year reviews; in the event that the site changes land use designation, the 5-year review will be used as a mechanism to determine if the site conditions require a modification or amendment to the site controls.”

Based on the 2nd FYR, “[E]xcavation and offsite disposal was conducted in December 2018. LUC Implementation Plan (LUCIP) is under review. LUCs need to be implemented.”

- **Site 77 (1917-Era Powder Magazines) and Site 130 (Vincent Road Septic System):**

Sites 77 and 130 were initially evaluated and determined not to require further investigation or remediation.

Recommendations for the SDEIS:

1. Given the current status of the CERCLA sites above, EPA has identified the following issues⁵ with regard to information contained in the scoping request and the Parcel 20 Reuse Plan:

⁵ The issues and recommendations provided herein do not represent a comprehensive regulatory and permitting review of the Parcel 20 Reuse Plan. Should the property be transferred, the EPA and other appropriate parties should be contacted regarding pertinent regulations and permitting requirements.

- a) The Scoping Request and the Parcel 20 Reuse Plan did not discuss how LUCs will be implemented and maintained under the conceptual redevelopment alternatives. As such, it is unclear if any of the three proposed reuse alternatives presented in the Parcel 20 Reuse Plan would impact the implementation of required LUCs that are established in the respective RODs for Sites 20 and 178. For example, the Parcel 20 Reuse Plan states, “The existing landfill area has potential space for a public gathering area and may include parking, recreational fields, a dog park, and gathering spaces such as picnic tables or gazebos;” however, there is no mention of the Site 20 LUCIP LUCs to “Protect human receptors from contact with the soil COCs and the landfill waste. Maintain the site in accordance with the Operation and Maintenance Plan and as required by 35 Illinois Administrative Code [IAC] 811.111” or “Prohibit unauthorized intrusive activity into or excavation of the landfill cap” in the scoping request or Parcel 20 Reuse Plan. Further, the Site 178 (Ordnance School Lake) land use control implementation plan (LUCIP) is still under development and has yet to be reviewed and approved by regulators.
- b) Section 3.4 [Ordnance and Explosives (OE) and Munitions Debris (MD)] of the Parcel 20 Reuse Plan indicates that Sites 20 and 73, “were confirmed disposal areas for munitions constituents based on historical contamination detected in the landfills, and uncontrolled dumping of munitions and munitions constituents may have occurred throughout Parcel 20.” However, the scoping request and Parcel 20 Reuse Plan do not discuss how potential exposure to munitions and munitions constituents will be mitigated. This is of particular concern given the proposed recreation areas and proposed recreational trails included in the conceptual redevelopment alternatives.
- c) The scoping request states, “Since publishing its reuse plan, the LRA also has indicated its interest in an interim use lease agreement and/or an early transfer agreement that would allow construction of a solar energy facility atop the capped landfill within LRA Parcel 20;” however, no further details were provided. For example, it is unclear how the construction of a solar energy facility atop the capped landfill at Site 20 will meet the Site 20 LUCIP LUCs to “Protect human receptors from contact with the soil COCs and the landfill waste. Maintain the site in accordance with the Operation and Maintenance Plan and as required by 35 Illinois Administrative Code [IAC] 811.111” or “Prohibit unauthorized intrusive activity into or excavation of the landfill cap.”
- d) Based on Sections 8.2 (Alternative 2: Commander’s Pond Lite) and 8.3 (Alternative 3: Commander’s Pond Full) of the Parcel 20 Reuse Plan, the conceptual redevelopment alternatives would require approximately 18 to 42 acres to be dredged including areas previously remediated. However, the cost and dredging estimates in Sections 9.2 (Cost Estimates) and 9.3 (Dredging Estimate) of the Parcel 20 Reuse Plan do not include details or costs associated with the management, characterization, or disposal of these dredged sediments. Constituents of concern at Site 178 previously included polynuclear aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), pesticides, and heavy metals. As such, it is unclear if the level of effort needed to dredge Site 178 has been sufficiently estimated.
- e) To date, the five CERCLA sites associated with LRA Parcel 20 have not been investigated for per- and polyfluoroalkyl substances (PFAS) contamination. As such, it

is unclear if the conceptual redevelopment alternatives and associated costing are sufficiently representative should a PFAS remedial action be warranted.

2. Assuming the Parcel 20 Reuse Plan will be an appendix to a future SDEIS, ensure that revisions to the Parcel 20 Reuse Plan include detailed information regarding the implementation of LUCs under the conceptual redevelopment alternatives, following regulatory approval of the LUCIP for Site 178.
3. Ensure the Parcel 20 Reuse Plan clarifies how potential exposure to munitions and munitions constituents will be mitigated.
4. Revise the Parcel 20 Reuse Plan to include information about all conceptual redevelopment alternatives and demonstrate that any solar facility components installed on the landfill cover will not adversely affect the final cover system.
5. Revise the Parcel 20 Reuse Plan to discuss the management, characterization, and disposal of all sediments to be dredged, and include a discussion on the sediments' impact on costs and schedule. This plan should also include additional characterization of the non-remediated portions of Commander's Pond.
6. Ensure the Parcel 20 Reuse Plan discusses how potential exposure to PFAS will be characterized and potentially mitigated given the lack of PFAS characterization of the sites.

2. WETLANDS/STREAMS/AQUATIC RESOURCES

- A. The scoping information indicates that Parcel 20 1) provides accessibility to water, roads, and rail, demonstrating access for port-related development, and 2) drains into creeks and sloughs of the Apple and Mississippi Rivers, replenishes groundwater supplies via low areas on the site, and contains bottomland forest. Due to its landscape location, it is likely that Parcel 20 contains wetlands and streams. Placing fill into wetlands or streams and/or relocation of or encapsulation of streams may trigger Clean Water Act (CWA) Section 404 permitting and the need for CWA Section 401 water quality certification from the Illinois EPA (IEPA).

Recommendations for the SDEIS:

1. Before the SDEIS is released for public review and comment, a formal wetland and Waters of the U.S. delineation should be completed to know definitively where wetlands, streams, and other regulated Waters of the U.S. are located. EPA strongly recommends that this delineation be completed before and included in (as an appendix to) the SDEIS. The SDEIS should provide accurate information on impacts to regulated water resources, and information on how those impacts will be mitigated.
2. Identify acreage for both direct (e.g., permanent fill), indirect (e.g., changes in hydrology), and temporary (e.g., temporary fill) impacts to regulated water resources, including wetlands, for each action alternative. Understanding that plans have not yet been developed, using a range to identify impacts would be useful to understand potential impacts (e.g., 100-150 acres of wetland impact).
3. Disclose how sequencing established by the CWA Section 404(b)(1) Guidelines, namely, avoidance first, followed by demonstration of impact minimization, and mitigation for unavoidable impacts was applied to determine aquatic impacts. The CWA Section 404(b)(1) guidelines call for the Least Environmentally Damaging Practicable Alternative

(LEDPA) to be selected to address impacts to wetlands, streams, and other waters of the United States.

4. Discuss potential wetland and stream mitigation requirements, if applicable.
5. Discuss the current conditions of surface water resources and potential impacts from the proposed project (e.g., impacts to Clean Water Act (CWA) Section 303(d)-listed water bodies and their impaired status).
6. Describe proposed measures to capture and filter stormwater runoff, preliminary drainage design, and proposed stormwater filtration.
7. Discuss whether sediments that would need to be dredged from Brickhouse Slough and Commander's Pond have been tested, and where clean dredged materials will be placed.
8. Consider beneficial re-use of dredged materials.

3. PROJECT DESIGN / PROJECT STAGING

- A. The SDEIS should include information regarding potential construction.

Recommendations for the SDEIS:

1. Consider impacts on existing infrastructure (e.g., drinking water intake locations, sewer/septic, utilities, stormwater and effluent discharge point sources, existing public and private piers and boat ramps) and how construction would impact or otherwise affect this infrastructure.
2. Provide information on contractor staging locations, access routes and locations, and mobilization.
3. Ensure that the wetland delineation to be undertaken includes all staging locations and that all staging and access road areas are investigated for the presence of regulated water resources.
4. Provide maps and figures showing all staging, access, and temporary road/mobilization locations, including areas of work within waterways.
5. Provide information on coordination with the state resource agencies regarding required permitting, and any required mitigation for proposed work.

4. ENVIRONMENTAL JUSTICE AND CHILDREN'S HEALTH

- A. Outreach and meaningful engagement are underlying pillars of environmental justice (EJ). It is imperative that DoA determine if the proposed Project will affect communities with EJ concerns. CEQ requires Lead agencies to analyze the disproportionate and adverse human health and environmental effects of a proposed action in communities with EJ concerns.⁶ If significant human health and environmental effects disproportionately and adversely affect communities with EJ concerns, CEQ regulations direct Lead agencies to consider incorporating mitigation measures that address or reduce those effects.⁷

Executive Order (EO) 14096: *Revitalizing Our Nation's Commitment to Environmental Justice for All* supplements EO 12898: *Federal Actions to Address Environmental Justice in*

⁶ 40 CFR § 1502.16(a)(13)

⁷ 40 CFR § 1505.3(b)

Minority and Low-Income Populations. EO 14096 directs Federal agencies, as appropriate and consistent with applicable law, to identify, analyze, and address disproportionate and adverse human health and environmental effects (including risks) and hazards of Federal activities, including those related to climate change and cumulative effects of environmental and other burdens on communities with EJ concerns.

Under CEQ's NEPA Implementing Regulations⁸ and EO 14096, environmental justice is now evaluated based simply on disproportionate and adverse effects. The Fact Sheet⁹ accompanying EO 14096 states, "*The Executive Order [EO 14096] uses the term 'disproportionate and adverse' as a simpler, modernized version of the phrase 'disproportionately high and adverse' used in Executive Order 12898. Those phrases have the same meaning but removing the word 'high' eliminates potential misunderstanding that agencies should be only considering large disproportionate effects.*" Ensure references reflect "*disproportionate and adverse*" as outlined in CEQ regulations and EO 14096.

Section 3(b)(i) of EO 14096 also directs EPA to assess whether each agency analyzes and avoids or mitigates disproportionate human health and environmental effects on communities with EJ concerns when carrying out responsibilities under Section 309 of the Clean Air Act, 42 U.S.C. 7609. EPA's recommendations below suggest opportunities to further analyze, disclose, and reduce effects to communities with EJ concerns.¹⁰

Recommendations for the SDEIS:

1. Identify the presence of communities with EJ concerns in the project area and within the broader area that could experience environmental impacts from the proposed project. Disclose demographic information and summarize input from community members.
2. Describe past activities and future plans to engage communities with EJ concerns during the environmental review and planning phase, and, if the project commences, during construction and operations.
3. Evaluate the impacts of this proposal on communities with EJ concerns and sensitive receptors (e.g., children, people with asthma, etc.).
4. Include an analysis and conclusion regarding whether the Project or any action alternatives may have disproportionate and adverse impacts on communities with EJ concerns, as specified in CEQ's Environmental Justice Guidance.¹¹ Identify what those effects may be and include measures that will be taken to avoid, minimize, or mitigate effects.
5. Compare project impacts to an appropriate reference community to determine whether there may be disproportionate impacts. Consider risk of exposure to hazardous/toxic

⁸ 40 CFR § 1502.16(a)(13)

⁹ FACT SHEET: President Biden Signs Executive Order to Revitalize Our Nation's Commitment to Environmental Justice for All. See <https://www.whitehouse.gov/briefing-room/statements-releases/2023/04/21/fact-sheet-president-biden-signs-executive-order-to-revitalize-our-nations-commitment-to-environmental-justice-for-all/>

¹⁰ For purposes of NEPA review, EPA considers a project to be in an area of potential EJ concern when the area shows one or more of the thirteen EJ indices at or above 80th percentile in the nation/state on EJScreen. However, scores under the 80th percentile should not be interpreted to mean there are definitively no EJ concerns present.

¹¹ CEQ's Environmental Justice Guidance Under the National Environmental Policy Act. See Section III, Part C-4.

https://www.epa.gov/sites/default/files/2015-02/documents/ej_guidance_nepa_ceq1297.pdf?VersionId=78iNGtdwSTz5E2x.H0aHq.E96_Tphbgd

materials associated with the proposed construction and operation and air quality and noise impacts due to construction.

6. Consider any disproportionate non-project-related pollution exposures that communities of concern may already be experiencing, as well as any disproportionate non-pollution stressors that may make the communities susceptible to pollution, such as health conditions, other social determinants of health, and disproportionate vulnerability related to climate change.
7. EJScreen can inform EJ and community outreach to identify potential meeting locations and any language barriers by providing information on linguistic isolation, languages spoken, and places of community cohesion (e.g., schools, places of worship), if applicable. EPA recommends DoA consider the following:
 - f) Discuss the meaningful involvement and targeted outreach undertaken by DoA in plain language and languages other than English spoken by residents in and/or near the Project area.
 - g) Utilize resources such as the Promising Practices for EJ Methodologies in NEPA Reviews Practices¹² report and the Community Guide to EJ and NEPA Methods¹³ to conduct an EJ analysis that appropriately engages in meaningful, targeted community outreach, analyzes effects, and advances environmental justice principles through NEPA implementation.
8. Establish material hauling routes away from places where children live, learn, and play, to the extent feasible. Consider homes, schools, daycares, and playgrounds. In addition to air quality benefits, careful routing may protect children from vehicle-pedestrian accidents. Identify potential material hauling routes in the SDEIS.

5. **CLIMATE CHANGE**

- A. Executive Order 14008: Tackling the Climate Crisis at Home and Abroad states, “*The United States and the world face a profound climate crisis. We have a narrow moment to pursue action...to avoid the most catastrophic impacts of that crisis and to seize the opportunity that tackling climate change presents.*” The U.S. Global Change Research Program’s National Climate Assessment provides data and scenarios that may be helpful in assessing trends in temperature, precipitation, and frequency and severity of storm events.¹⁴

Federal courts have consistently held that NEPA requires agencies to disclose and consider climate impacts in their reviews, including impacts from greenhouse gas (GHG) emissions. On January 9, 2023, the Council on Environmental Quality (CEQ) published interim guidance to assist Federal agencies in assessing and disclosing climate change impacts during environmental reviews.¹⁵ CEQ developed this interim guidance in response to Executive Order 13990 - *Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis*. This interim guidance was effective immediately. CEQ indicated that agencies should use this interim guidance to inform the NEPA review for all

¹² https://www.epa.gov/sites/default/files/2016-08/documents/nepa_promising_practices_document_2016.pdf

¹³ <https://www.energy.gov/sites/prod/files/2019/05/f63/NEPA%20Community%20Guide%202019.pdf>

¹⁴ Information on changing climate conditions is available through the National Climate Assessment at: <https://nca2023.globalchange.gov/>

¹⁵ <https://www.federalregister.gov/documents/2023/01/09/2023-00158/national-environmental-policy-act-guidance-on-consideration-of-greenhouse-gas-emissions-and-climate>

new proposed actions and may use it for evaluations in process, as agencies deem appropriate, such as informing the consideration of alternatives or helping address comments raised through the public comment process. EPA recommends that DoA apply the interim guidance as appropriate, to ensure robust consideration of potential climate impacts, mitigation, and adaptation issues.

In addition, estimates of the social cost of greenhouse gases (SC-GHG¹⁶) are informative for assessing the impacts of GHG emissions. SC-GHG estimates allow analysts to monetize the societal value of changes in GHG emissions from actions that have small, or marginal, impacts on cumulative global emissions. Estimates of the social cost of carbon (SC-CO₂) and other greenhouse gases (e.g., social cost of methane (SC-CH₄)) have been used for over a decade in Federal government analyses. Quantification of anticipated GHG releases and associated SC-GHG comparisons among all alternatives (including the No Action Alternative scenarios) within the SDEIS would inform project decision-making and provide clear support for implementing all practicable measures to minimize GHG emissions and releases.

EPA recommends that DoA review EPA's final technical report, "*Report on the Social Cost of Greenhouse Gases: Estimates Incorporating Recent Scientific Advances*¹⁷," which explains the methodology underlying the most recent set of SC-GHG estimates. To better assist lead Federal agencies with the utilization of these updated estimates, EPA has also recently released a Microsoft Excel "Workbook for Applying SC-GHG Estimates v.1.0.1" spreadsheet¹⁸ which was designed by EPA's National Center for Environmental Economics to help analysts calculate the monetized net social costs of increases in GHG emissions using the estimates of the SC-GHGs.

Recommendations for the SDEIS:

1. DoA should apply the interim guidance as appropriate, to ensure robust consideration of potential climate impacts, mitigation, and adaptation issues. Additional recommendations are as follows:
 - a) Emissions & SC-GHG Disclosure and Analysis:
 - i. Quantify estimates of all direct and indirect GHG emissions¹⁹ from the proposed project over its anticipated lifetime for all alternatives, including the No Action Alternative, broken out by GHG type.
 - ii. Include a detailed discussion of the project's reasonably foreseeable direct and indirect GHG emissions in the context of actions necessary to achieve Illinois' policies and GHG emission reduction goals²⁰ as well as national policy and GHG

¹⁶ EPA uses the general term, "social cost of greenhouse gases" (SC-GHG), where possible because analysis of GHGs other than CO₂ are also relevant when assessing the climate damages resulting from GHG emissions. The social cost of carbon (SC-CO₂), social cost of methane (SC-CH₄), and social cost of nitrous oxide (SC-N₂O) can collectively be referenced as the SC-GHG.

¹⁷ https://www.epa.gov/system/files/documents/2023-12/epa_scghg_2023_report_final.pdf

¹⁸ <https://www.epa.gov/environmental-economics/scghg>

¹⁹ As discussed in Section IV(A) of CEQ's 2023 interim guidance, "agencies generally should quantify all reasonably foreseeable emissions associated with a proposed action and reasonable alternatives (as well as the no-action alternative). Quantification should include the reasonably foreseeable direct and indirect GHG emissions of their proposed actions. Agencies also should disclose the information and any assumptions used in the analysis and explain any uncertainty. In assessing a proposed action's, and reasonable alternatives', reasonably foreseeable direct and indirect GHG emissions, the agency should use the best available information."

²⁰ Including, but not limited to, the goals for Illinois laid out here: https://www2.illinois.gov/ISNews/23893-Climate_and_Equitable_Jobs_Act.pdf

emission reduction goals over the anticipated project lifetime, including the U.S. 2030 Paris targets and the 2050 goal for net-zero energy emissions.

- iii. Use SC-GHG estimates to disclose and consider the climate damages from net changes in direct and indirect emissions of CO₂ and other GHGs resulting from the proposed project. To do so, EPA recommends a breakdown of estimated net GHG emission changes by individual gas, rather than relying on CO₂-equivalent (CO₂e) estimates, and then monetize the climate impacts associated with each GHG using the corresponding social cost estimate (e.g., monetize CH₄ emissions changes expected to occur with the social cost of methane (SC-CH₄) estimate for emissions).²¹ When applying SC-GHG estimates, just as with tools to quantify emissions, DoA should disclose the assumptions (e.g., discount rates) and uncertainties associated with such analysis and the need for updates over time to reflect evolving science and economics of climate impacts.
- iv. Use comparisons of GHG emissions and SC-GHG across alternatives to inform project decision-making.
- b) Resilience and Adaptation
 - i. Describe changing climate conditions (e.g., temperatures and frequency and severity of storm events) and assess how such changes could impact the proposed project and the environmental impacts of the proposed project and alternatives.
 - ii. Incorporate robust climate resilience and adaption considerations into (1) project design and engineering; (2) construction oversight; (3) commitments for protective measures related to stormwater and erosion; and (4) routine monitoring. The SDEIS should describe how DoA has addressed such considerations and provide a rationale for any reasonable alternatives to enhance resilience that were not adopted or discussed in detail.
- c) Reduction and Mitigation
 - i. Identify practices to reduce and mitigate GHG emissions; include commitments by DoA and LRA to do so in the SDEIS. We recommend DoA consider practices in the enclosed Construction Emission Control Checklist.
 - ii. Analyze best available control strategies, while considering low sensitive environmental and health receptors (e.g., schools and play areas along truck travel routes).

6. ENERGY EFFICIENCY AND ENVIRONMENTAL BEST PRACTICES

- A. Energy efficient design and material selection could reduce operations costs and promote a high-quality work environment, while also better protecting the environment. Recycling construction debris also preserves valuable landfill space and makes use of materials that have high embodied energy.

²¹ Transforming gases into CO₂e using Global Warming Potential (GWP) metrics, and then multiplying the CO₂e tons by the SC-CO₂, is not as accurate as a direct calculation of the social costs of non-CO₂ GHGs. This is because GHGs differ not just in their potential to absorb infrared radiation over a given time frame, but also in the temporal pathway of their impact on radiative forcing and in their impacts on physical endpoints other than temperature change, both of which are relevant for estimating their social cost but not reflected in the GWP. See the Interagency Working Group on Social Cost of Greenhouse Gases' February 2021 *Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide Interim Estimates under Executive Order 13990* for more discussion and the range of annual SC-CO₂, SC-CH₄, and SC-N₂O estimates currently used in Federal benefit-costs analyses.

Recommendations for the SDEIS:

1. Achieving Leadership in Energy & Environmental Design (LEED) certification at the platinum level (or design for net-zero energy usage) for any new buildings associated with the project. Best practices for energy efficiency and sustainable building design can include the use of energy-efficient building materials, such as south-facing skylights and windows, motion sensed lighting, solar, wind, and/or geothermal power, and Energy Star certified windows and doors. In addition to reducing the overall environmental footprint, green building certification programs promote health by encouraging practices that protect indoor air quality. At a minimum, EPA encourages DoA to commit to analyze the strengths and feasibility of these strategies.
2. Constructing proposed roads, parking lots, sidewalks, or other surfaces slated for driving or walking with using permeable pavement or porous pavers to reduce runoff.
3. Identifying and implementing of opportunities for additional green stormwater management practices. Opportunities include, but are not limited to, green roofs, bioswales, and rain gardens.
4. Ensuring areas around all new buildings associated with the project which are not planned for operations be considered for conversion to native habitats, increasing the area which can be beneficially used for wildlife, stormwater infiltration or detention, and aesthetics, among other functions.
5. Discussing to what extent DoA will require energy efficiency measures, greenhouse gas reductions, and other sustainability measures, per Executive Order 14057.
6. Incorporating electric vehicle charging stations in new parking areas and designating priority parking spots for carpools and low emission vehicles.
7. Committing to recycle a high percentage of construction and demolition debris.
8. Replacing raw materials with recycled materials for infrastructure components. Options include, but are not limited to:
 - a) Using recycled materials to replace carbon-intensive Portland Cement in concrete as “supplementary cementitious material;”
 - b) Using tire-derived aggregate in lightweight embankment fill and retaining wall backfill; and
 - c) Using recycled materials in pavement applications, such as crushed recycled concrete, recycled asphalt pavement, and rubberized asphalt concrete. Also, in some circumstances, demolished onsite asphalt can be re-used (e.g., cold in-place recycling or full depth reclamation).

7. NATURAL FEATURES

- A. The Refuge borders Parcel 20 on three side that includes all water access routes to the Mississippi River. It appears that proposed re-use will extend into Refuge lands.

Recommendations for the SDEIS:

1. Discuss coordination with the U.S. Fish and Wildlife Service regarding potential impacts to the Refuge and whether proposed activities are compatible uses of Refuge lands and waters. Consider activities associated with construction (e.g., installing utilities on Refuge lands) as well as operation of proposed features.

2. Discuss potential impact to Federally-listed threatened or endangered species listed in Table ES-2. The fact that critical habitat has not been designated for these species does not equate to an analysis of potential impacts to the species themselves as a result of the proposed re-use plan. In particular, consider impacts to mussel species.

8. NON-NATIVE INVASIVE SPECIES (NNIS)

- A. Based on the proximity of the project area to the Refuge and the Mississippi River, the potential for the proposed project to spread terrestrial and aquatic NNIS is high. Care needs to be taken to reduce the spread of NNIS during project planning and implementation.

Recommendations for the SDEIS:

1. Provide baseline information pertaining to current locations and acreages of terrestrial and aquatic NNIS on project lands.
2. Discuss how the project will comply with Executive Order 13112 – Safeguarding the Nation from the Impacts of Invasive Species. include a discussion of standard best management practices (e.g., washing construction equipment) that will be used to eliminate the spread of NNIS into, as well as out of, the project area.
3. Assuming NNIS are present in the project area, discuss measures that can be taken to control or eradicate existing populations, ideally before earthmoving activities begin.

9. CUMULATIVE IMPACTS ANALYSIS

- A. Development along the Mississippi River has a lengthy history. Cumulative impacts are impacts resulting from the proposed action's incremental impacts when added to the impacts of other past, present, and reasonably-foreseeable future actions, including those under the control of other entities.

Recommendations for the SDEIS:

1. Discuss potential direct, indirect, and cumulative impacts to resources in the project area that could be affected by the proposed project.
2. Consider reasonably-foreseeable impacts as a result of the proposed project (e.g., roadway improvements, induced growth, etc.). Regional or county-wide smart growth or land use plans should inform the discussion of induced growth and cumulative impacts.

10. PERMITTING

- A. The SDEIS should include a list of all Federal, state, and local permits that will be required to undertake the preferred alternative. For all environmental impact categories requiring coordination with other Federal and state resource agencies, EPA recommends copies of both your letters to those agencies, as well as the responses from those agencies, be provided as appendices to the SDEIS.

11. INTERAGENCY COORDINATION

- A. Implementation of NEPA requires interagency coordination with multiple stakeholders, including Federal and state resource agencies, Tribes, local governments, and affected landowners.

Recommendations for the SDEIS:

1. Include copies of all interagency coordination sent to, and received from Federal and state resource agencies, Tribes, and local municipalities.
2. Include a list of all Federal, state, and local permits that would be required to undertake the Preferred Alternative.

12. OTHER COMMENTS

- A. The SDEIS should indicate how comments received during the scoping period were addressed.

Recommendations for the SDEIS:

1. Create an appendix that include all comments received during the SDEIS scoping period, including any applicable transcripts of comments from the public.
2. Create an appendix that includes all correspondence sent to and received from government agencies regarding the proposed project.
3. Create a chart that lists the following:
 - a) all comments received during the SDEIS review period;
 - b) DoA's response with a reference to the section that was changed as a result of the comment, if applicable. Include section and page number for ease of reference; and
 - c) associated mitigation efforts with responsible entity.
4. EPA recommends all technical terms be explained in plain language in the SDEIS.
5. We recommend DoA access the following databases to obtain environmental information related to the project area:
 - a) WATERS²²: <https://www.epa.gov/waterdata/waters-watershed-assessment-tracking-environmental-results-system>
 - b) Envirofacts²³: <https://www3.epa.gov/enviro/facts/multisystem.html>
 - c) EJSCREEN: <https://www.epa.gov/ejscreen>
 - d) NEPAassist: <https://www.epa.gov/nepa/nepassist>
 - e) CWA 303(d) Listed Impaired Waters: <https://epa.illinois.gov/topics/water-quality/watershed-management/tmdls/303d-list.html>
 - f) National Ambient Air Quality Standards status: https://www3.epa.gov/airquality/greenbook/anayo_il.html

²² The **Watershed Assessment, Tracking & Environmental Results System (WATERS)** unites water quality information previously available only from several independent and unconnected databases.

²³ Includes enforcement and compliance information.

U.S. Environmental Protection Agency **Construction Emission Control Checklist**

Diesel emissions and fugitive dust from project construction may pose environmental and human health risks and should be minimized. In 2002, EPA classified diesel emissions as a likely human carcinogen, and in 2012 the International Agency for Research on Cancer concluded that diesel exhaust is carcinogenic to humans. Acute exposures can lead to other health problems, such as eye and nose irritation, headaches, nausea, asthma, and other respiratory system issues. Longer term exposure may worsen heart and lung disease.²⁴ We recommend DoA consider the following protective measures and commit to applicable measures in the SDEIS.

Mobile and Stationary Source Diesel Controls

Purchase or solicit bids that require the use of vehicles that are equipped with zero-emission technologies or the most advanced emission control systems available. Commit to the best available emissions control technologies for project equipment in order to meet the following standards.

- On-Highway Vehicles: On-highway vehicles should meet, or exceed, the EPA exhaust emissions standards for model year 2010 and newer heavy-duty, on-highway compression-ignition engines (e.g., long-haul trucks, refuse haulers, shuttle buses, etc.).²⁵
- Non-road Vehicles and Equipment: Non-road vehicles and equipment should meet, or exceed, the EPA Tier 4 exhaust emissions standards for heavy-duty, non-road compression-ignition engines (e.g., construction equipment, non-road trucks, etc.).²⁶
- Marine Vessels: Marine vessels hauling materials for infrastructure projects should meet, or exceed, the latest EPA exhaust emissions standards for marine compression-ignition engines (e.g., Tier 4 for Category 1 & 2 vessels, and Tier 3 for Category 3 vessels).²⁷
- Low Emission Equipment Exemptions: The equipment specifications outlined above should be met unless: 1) a piece of specialized equipment is not available for purchase or lease within the United States; or 2) the relevant project contractor has been awarded funds to retrofit existing equipment, or purchase/lease new equipment, but the funds are not yet available.

Consider requiring the following best practices through the construction contracting or oversight process:

- Use onsite renewable electricity generation and/or grid-based electricity rather than diesel-powered generators or other equipment.
- Use electric starting aids such as block heaters with older vehicles to warm the engine.
- Regularly maintain diesel engines to keep exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance (e.g., blue/black smoke indicates that an engine requires servicing or tuning).
- Where possible, retrofit older-tier or Tier 0 nonroad engines with an exhaust filtration device before it enters the construction site to capture diesel particulate matter.

²⁴ Benbrahim-Tallaa, L, Baan, RA, Grosse, Y, Lauby-Secretan, B, El Ghissassi, F, Bouvard, V, Guha, N, Loomis, D, Straif, K & International Agency for Research on Cancer Monograph Working Group (2012). Carcinogenicity of diesel-engine and gasoline-engine exhausts and some nitroarenes. The Lancet. Oncology, vol. 13, no. 7, pp. 663-4. Accessed online from:

https://kclpure.kcl.ac.uk/portal/files/6492297/coverBenbrahim_Tallaa_2012_Lancet_Oncology.pdf

²⁵ <https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-heavy-duty-highway-engines-and-vehicles>

²⁶ <https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-nonroad-engines-and-vehicles>

²⁷ <https://www.epa.gov/emission-standards-reference-guide/all-epa-emission-standards>

- Replace the engines of older vehicles and/or equipment with diesel- or alternatively-fueled engines certified to meet newer, more stringent emissions standards (e.g., plug-in hybrid-electric vehicles, battery-electric vehicles, fuel cell electric vehicles, advanced technology locomotives, etc.), or with zero emissions electric systems. Retire older vehicles, given the significant contribution of vehicle emissions to the poor air quality conditions. Implement programs to encourage the voluntary removal from use and the marketplace of pre-2010 model year on-highway vehicles (e.g., scrappage rebates) and replace them with newer vehicles that meet or exceed the latest EPA exhaust emissions standards, or with zero emissions electric vehicles and/or equipment.

Fugitive Dust Source Controls

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative, where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
- Install wind fencing and phase grading operations where appropriate and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

Occupational Health

- Reduce exposure through work practices and training, such as maintaining filtration devices and training diesel-equipment operators to perform routine inspections.
- Position the exhaust pipe so that diesel fumes are directed away from the operator and nearby workers, reducing the fume concentration to which personnel are exposed.
- Use enclosed, climate-controlled cabs pressurized and equipped with high-efficiency particulate air (HEPA) filters to reduce the operators' exposure to diesel fumes. Pressurization ensures that air moves from inside to outside. HEPA filters ensure that any incoming air is filtered first.
- Use respirators, which are only an interim measure to control exposure to diesel emissions. In most cases, an N95 respirator is adequate. Workers must be trained and fit-tested before they wear respirators. Depending on the type of work being conducted, and if oil is present, concentrations of particulates present will determine the efficiency and type of mask and respirator. Personnel familiar with the selection, care, and use of respirators must perform the fit testing. Respirators must bear a National Institute for Occupational Safety and Health approval number.

NEPA Documentation

- Per Executive Order 13045 on Children's Health,²⁸ EPA recommends the lead agency and project proponent pay particular attention to worksite proximity to places where children live, learn, and play, such as homes, schools, and playgrounds. Construction emission reduction

²⁸ Children may be more highly exposed to contaminants because they generally eat more food, drink more water, and have higher inhalation rates relative to their size. Also, children's normal activities, such as putting their hands in their mouths or playing on the ground, can result in higher exposures to contaminants as compared with adults. Children may be more vulnerable to the toxic effects of contaminants because their bodies and systems are not fully developed, and their growing organs are more easily harmed. EPA views childhood as a sequence of life stages, from conception through fetal development, infancy, and adolescence.

measures should be strictly implemented near these locations in order to be protective of children's health.

- Specify how impacts to sensitive receptors, such as children, elderly, and the infirm will be minimized. For example, locate construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.



REGION 5

CHICAGO, IL 60604

February 2, 2024

Thomas Lineer, BRAC Program Manager
Department of the Army
Savanna Army Depot Activity
18935 B Street
Savanna, Illinois 61074

Re: EPA Scoping Comments – BRAC Disposal and Re-use of Local Redevelopment Authority Parcel 20, Former Savanna Army Depot, Carroll and Jo Davies Counties, Illinois

Dear Mr. Lineer,

The U.S. Environmental Protection Agency (EPA) has reviewed the Department of the Army's (DoA) November 27, 2023, scoping request for reuse of a 132-acre parcel of the Savanna Army Depot Activity (SVAD) and expected subsequent reuse of this acreage. This letter provides EPA's comments on the scoping request and Jo Carroll Depot Local Redevelopment Authority Final Reuse Plan for Parcel 20, Former Savanna Army Depot, dated June 2023 (hereinafter the Parcel 20 Reuse Plan), pursuant to our authorities under the National Environmental Policy Act (NEPA), the Council on Environmental Quality's (CEQ) NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

The SVAD site is a 13,062-acre former DoA installation located on the eastern bank of the Mississippi River, seven miles north of Savanna, Illinois. Between 1917 and 1995, the DoA used the property for artillery weapons and ammunition testing, storage of ordnance, and the loading and renovating of shells and bombs. The 1995 Base Realignment and Closure (BRAC) Commission recommended closure of SVAD, and the DoA officially closed SVAD in 2000. The DoA has been conducting environmental remediation to clean-up surplus property in preparation for eventual property transfer.

On January 17, 2018, the DoA published notice in the Federal Register indicating surplus property was available at SVAD for public benefit purposes and that the Jo Carroll Depot Local Redevelopment Authority (LRA) had been recognized by the Department of Defense as the Local Redevelopment Authority for this surplus property. The LRA performed an analysis (the Parcel 20 Reuse Plan) in support of reuse planning for LRA Parcel 20, which covers 132 acres, for DoA's use when preparing the NEPA scoping document.

LRA Parcel 20 is 132 acres of undeveloped land within the SVAD. It is bordered by the Upper Mississippi River National Wildlife and Fish Refuge (Refuge) to the west, the Apple River to the east and

south, and the Mississippi River to the west. The Parcel includes low-lying areas associated with the Apple River, Brickhouse Slough, and Commander's Pond. An active Burlington Northern Santa Fe Railway line bisects the Parcel from northwest to southeast but is not part of the Parcel under consideration for transfer. Parcel 20 lies almost completely within the floodplain and is adjacent to the Refuge.

The LRA presented DoA with three conceptual reuse alternatives for redevelopment of LRA Parcel 20. The LRA's primary focus consists of a no-cost economic development conveyance; each of the three conceptual reuse alternatives proposes commercial and industrial development and passive recreational development. Since publishing its reuse plan, the LRA also indicated interest in an interim use lease agreement and/or early transfer agreement that would permit construction of a solar energy facility atop an existing capped landfill located within LRA Parcel 20.

Three conceptual alternatives for redevelopment of Parcel 20 were identified in the scoping document as follows:

Alternative 1 (Brickhouse Slough) - This alternative prioritizes fleet¹ development of a dry bulk and liquid bulk wharf on the Brickhouse Slough and recreational use. Key port infrastructure includes a barge fleeting area, an 800 foot dry and liquid bulk wharf, a floating dry dock, a wharf access road, a haul road, a liquid bulk pipeline, and a conveyor system.

Alternative 2 (Commander's Pond Lite) – This alternative expands on Alternative 1 and adds a 600-foot lift-on/lift-off wharf to allow the handling of two 250-foot barges simultaneously to support expansion of specialty and breakbulk cargos and dry dock capacity. This concept would require approximately 18 acres of dredging within the Commander's Pond area to support access to Brickhouse Slough.

Alternative 3 (Commander's Pond Full) – This alternative expands on Alternative 2 and adds additional port support to include an additional 350-foot lift-on/lift-off wharf to allow the handling of two 250-foot barges simultaneously, a repair fleeting area, and the inclusion of an aquatic habitat restoration area. This concept would require approximately 42 acres of dredging within the Commander's Pond area with 26 acres to support cargo activities and the remaining 16 acres dedicated for aquatic habitat restoration.

The LRA preferred alternative is Alternative 3. The scoping information indicates the timing for capital expenditures is not fully established and will depend in large part on market interest and development participation by private partners as well as regulatory and permitting issues. To facilitate implementation, the alternatives are designed to phase into each other seamlessly and sequentially. For example, Alternative 1 could be initiated immediately with a target five-year completion window, while Alternatives 2 and 3 could follow in a five-year plus completion window.

According to the scoping information, the development of these parcels by the LRA could not occur if the land was not transferred to it by the DoA. According to NEPA regulations, connected actions are

¹ Fleeting would provide "parking areas" while cargo is being loaded/offloaded.

those actions that could not or would not occur but for another action (e.g., the proposed land transfer from DoA to LRA). Connected actions must be analyzed in the same NEPA document, because the environmental impacts generated from the non-DoA action would not occur but for the DoA action of transferring Parcel 20.²

EPA's detailed NEPA scoping comments are enclosed with this letter. We recommend that the forthcoming Draft Environmental Assessment (EA) address these comments and our recommendations, which generally relate to Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) sites, impacts to wetlands and aquatic resources, environmental justice, greenhouse gases and climate change, project design and environmental best practices, natural features, and non-native, invasive species.

Thank you for the opportunity to review and provide comments at this stage of project development. Please send an electronic copy of future NEPA documents to R5NEPA@epa.gov. If you would like to discuss the contents of this letter further, please contact Kathy Kowal, lead NEPA reviewer for this project, at kowal.kathleen@epa.gov. Ms. Kowal is also available at 312-353-5206

Sincerely,

**KRYSTLE
MCCLAIN**

Digitally signed by
KRYSTLE MCCLAIN

Date: 2024.02.02
07:33:11 -06'00'

Krystle Z. McClain, P.E.
NEPA Program Supervisor
Tribal and Multimedia Programs Office

Enclosures:

EPA Detailed Scoping Comments
Construction Emission Control Checklist

Cc (with enclosures):

William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity
Ed Britton, Upper Mississippi River National Wildlife and Fish Refuge
Charlene Falco, Illinois Environmental Protection Agency
Bradley Hayes, Illinois Department of Natural Resources
Nicole Goers, U.S. Environmental Protection Agency

² 40 CFR 1508.25 (a)(1))

**EPA's Detailed Scoping Comments: Implementation of BRAC Disposal and
Re-use of LRA Parcel 20 Former Savanna Army Depot
Carroll and Jo Davies Counties, Illinois**

February 2, 2024

COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT (CERCLA) SITES

LRA Parcel 20 includes CERCLA sites which were previously investigated [e.g., Site 20 (Abandoned Landfill), Site 73 (Stables Landfill), Site 77 (1917-Era Powder Magazines), Site 130 (Vincent Road Septic System), Shop Area (Buildings 100 through 129 Sanitary and Stormwater Sewer lines and Outfalls to Site 178 and Site 178 (Ordnance School Lake, also known as Commander's Pond)]. Based on information available to EPA, the current status of the CERCLA sites is as follows:

- **Site 20 (Abandoned Landfill):**

According to the *Final Record of Decision, Site 20 – Abandoned Landfill and Site 99 – Building 762, CF Plant Battery Shop and Leaching Pits, Savanna Army Depot Activity, Savanna, Illinois*, dated June 2016 (Site 20 Record of Decision (ROD)), the selected remedy included landfill capping with hotspot removal, long-term groundwater monitoring, and land use controls (LUCs). Based on the *Final Land Use Control Implementation Plan, Site 20 Abandoned Landfill, Savanna Army Depot Activity, Savanna, Illinois*, dated October 2019 (Site 20 LUCIP), the institutional and engineering controls for Site 20 include:

- environmental covenants to prohibit residential use, access to groundwater, and intrusive activities (including agricultural use) at the site;
- Illinois Environmental Protection Agency (Illinois EPA), DoA, and EPA review of LUC inspections and approval processes;
- maintenance of a vegetated engineered landfill cap constructed with at least 2 feet of compacted clay and 6 inches of top soil and turf reinforcement mat including the intended vegetative cover and the underlying soil such that erosion gullies and localized settlement do not occur;
- use of site boundaries to limit site access: wetlands and the Apple River form the northeastern, eastern, and southern boundaries and a railroad right-of-way and fencing along the western boundary of the site; and,
- signs and engineered cap delineation posts are installed along the boundary of the site.

Based on the *Final Second Five-Year Review Report for Savanna Army Depot Activity Superfund Site, Savanna, Jo Daviess and Carroll Counties, Illinois*, dated June 2020 (2nd FYR), the excavation, offsite disposal of soil, and installation of a vegetated engineered landfill cap have been completed. However, the UECA [Uniform Environmental Covenants Act] environmental covenants have not been executed. Groundwater monitoring is still ongoing.

- **Site 73 (Stables Landfill):**

According to the *Final Record of Decision, Site 73 – Stable Landfill and Site 178 – Ordnance School Lake, Savanna Army Depot Activity, Savanna, Illinois*, dated August 2016 (Sites 73 & 178 ROD), the

selected remedy for Site 73 includes “[R]emoval and disposal of bulk debris and drums as nonhazardous waste following appropriate characterization; excavation of soil containing COCs [contaminants of concern] at concentrations above the remediation goals for residential use; transportation of the excavated debris and soil to a RCRA [Resource Conservation and Recovery Act] Subtitle D permitted facility (assuming the soil is nonhazardous); and, restoration of the site, which may include restoration of disturbed wetlands.”

Based on the 2nd FYR, “Remedial action was completed in December 2018 and the completion report is in the final stages. Site meets requirements for unrestricted use.”

- **Site 178 (Ordnance School Lake also known as Commander’s Pond):**

According to the Sites 73 & 178 ROD, the selected remedy for Site 178 includes “[E]xcavation of outfall surface soil and sediment along the western shoreline containing COCs at concentrations above recreational remediation goals; transportation of excavated material to a RCRA Subtitle D permitted facility for disposal (assuming the material is nonhazardous); site restoration, including regrading and/or bank stabilization; implementation of administrative LUCs (e.g., zoning laws) to maintain recreational or industrial/commercial use of the property; development of a Land Use Control Implementation Plan (LUCIP) to document strategies for implementing, maintaining, monitoring, and enforcing LUCs at the site; and, periodic monitoring of the LUCs conducted annually and as part of CERCLA 5-year reviews; in the event that the site changes land use designation, the 5-year review will be used as a mechanism to determine if the site conditions require a modification or amendment to the site controls.”

Based on the 2nd FYR, “[E]xcavation and offsite disposal was conducted in December 2018. LUC Implementation Plan (LUCIP) is under review. LUCs need to be implemented.”

- **Site 77 (1917-Era Powder Magazines) and Site 130 (Vincent Road Septic System):**

Sites 77 and 130 were initially evaluated and determined not to require further investigation or remediation.

EPA Concerns and Recommendations³ for the forthcoming Draft EA:

Given the current status of the CERCLA sites above, EPA has identified the following issues with regard to information contained in the scoping request and the Parcel 20 Reuse Plan:

- **Issue 1:** The Scoping Request and the Parcel 20 Reuse Plan did not discuss how LUCs will be implemented and maintained under the conceptual redevelopment alternatives. As such, it is unclear if any of the three proposed reuse alternatives presented in the Parcel 20 Reuse Plan would impact the implementation of required LUCs that are established in the respective RODs for Sites 20 and 178. For example, the Parcel 20 Reuse Plan states, “The existing landfill area has potential space for a public gathering area and may include parking, recreational fields, a dog park, and gathering spaces such as picnic tables or

³ The issues and recommendations provided herein do not represent a comprehensive regulatory and permitting review of the Parcel 20 Reuse Plan. Should the property be transferred, the EPA and other appropriate parties should be contacted regarding pertinent regulations and permitting requirements.

gazeboes;" however, there is no mention of the Site 20 LUCIP LUCs to "Protect human receptors from contact with the soil COCs and the landfill waste. Maintain the site in accordance with the Operation and Maintenance Plan and as required by 35 Illinois Administrative Code [IAC] 811.111" or "Prohibit unauthorized intrusive activity into or excavation of the landfill cap" in the scoping request or Parcel 20 Reuse Plan. Further, the Site 178 (Ordnance School Lake) land use control implementation plan (LUCIP) is still under development and has yet to be reviewed and approved by regulators.

- Issue 2: Section 3.4 [Ordnance and Explosives (OE) and Munitions Debris (MD)] of the Parcel 20 Reuse Plan indicates that Sites 20 and 73, "were confirmed disposal areas for munitions constituents based on historical contamination detected in the landfills, and uncontrolled dumping of munitions and munitions constituents may have occurred throughout Parcel 20." However, the scoping request and Parcel 20 Reuse Plan do not discuss how potential exposure to munitions and munitions constituents will be mitigated. This is of particular concern given the proposed recreation areas and proposed recreational trails included in the conceptual redevelopment alternatives.
- Issue 3: The scoping request states, "Since publishing its reuse plan, the LRA also has indicated its interest in an interim use lease agreement and/or an early transfer agreement that would allow construction of a solar energy facility atop the capped landfill within LRA Parcel 20;" however, no further details were provided. For example, it is unclear how the construction of a solar energy facility atop the capped landfill at Site 20 will meet the Site 20 LUCIP LUCs to "Protect human receptors from contact with the soil COCs and the landfill waste. Maintain the site in accordance with the Operation and Maintenance Plan and as required by 35 Illinois Administrative Code [IAC] 811.111" or "Prohibit unauthorized intrusive activity into or excavation of the landfill cap."
- Issue 4: Based on Sections 8.2 (Alternative 2: Commander's Pond Lite) and 8.3 (Alternative 3: Commander's Pond Full) of the Parcel 20 Reuse Plan, the conceptual redevelopment alternatives would require approximately 18 to 42 acres to be dredged including areas previously remediated. However, the cost and dredging estimates in Sections 9.2 (Cost Estimates) and 9.3 (Dredging Estimate) of the Parcel 20 Reuse Plan do not include details or costs associated with the management, characterization, or disposal of these dredged sediments. Constituents of concern at Site 178 previously included polynuclear aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), pesticides, and heavy metals. As such, it is unclear if the level of effort needed to dredge Site 178 has been sufficiently estimated.
- Issue 5: To date, the five CERCLA sites associated with LRA Parcel 20 have not been investigated for per- and polyfluoroalkyl substances (PFAS) contamination. As such, it is unclear if the conceptual redevelopment alternatives and associated costing are sufficiently representative should a PFAS remedial action be warranted.

Recommendations for the Draft EA:

- Assuming the Parcel 20 Reuse Plan will be an appendix to a future Draft EA, ensure that revisions to the Parcel 20 Reuse Plan include detailed information regarding the implementation of LUCs under the conceptual redevelopment alternatives, following regulatory approval of the LUCIP for Site 178.

- Ensure the Parcel 20 Reuse Plan clarifies how potential exposure to munitions and munitions constituents will be mitigated.
- Revise the Parcel 20 Reuse Plan to include information about all conceptual redevelopment alternatives and demonstrate that any solar facility components installed on the landfill cover will not adversely affect the final cover system.
- Revise the Parcel 20 Reuse Plan to discuss the management, characterization, and disposal of all sediments to be dredged, and include a discussion on the sediments' impact on costs and schedule. This plan should also include additional characterization of the non-remediated portions of Commander's Pond.
- Ensure the Parcel 20 Reuse Plan discusses how potential exposure to PFAS will be characterized and potentially mitigated given the lack of PFAS characterization of the sites.

WETLANDS/STREAMS/AQUATIC RESOURCES

The scoping information indicates that Parcel 20 provides accessibility to water, roads, and rail, demonstrating access for port-related development. The scoping information indicates that Parcel 20 drains into creeks and sloughs of the Apple and Mississippi Rivers, replenishes groundwater supplies via low areas on the site, and contains bottomland forest. Due to its landscape location, it is likely that Parcel 20 contains wetlands and streams. Fill into wetlands, or fill into, relocation of, or encapsulation of streams may trigger Clean Water Act (CWA) Section 404 permitting and the need for CWA Section 401 water quality certification from the Illinois EPA (IEPA).

Recommendations for the Draft EA:

- Before the Draft EA is released for public review and comment, a formal wetland and Waters of the U.S. delineation should be completed to know definitively where wetlands, streams, and other regulated Waters of the U.S. are located. EPA strongly recommends that this delineation be completed before and included in (as an appendix to) the Draft EA. The Draft EA should provide accurate information on impacts to regulated water resources, and information on how those impacts will be mitigated.
- Identify acreage for both direct (e.g., permanent fill), indirect (e.g., changes in hydrology), and temporary (e.g., temporary fill) impacts to regulated water resources, including wetlands, for each action alternative. Understanding that plans have not yet been developed, using a range to identify impacts would be useful to understand potential impacts (e.g., 100-150 acres of wetland impact);
- Disclose how sequencing established by the CWA Section 404(b)(1) Guidelines, namely, avoidance first, followed by demonstration of impact minimization, and mitigation for unavoidable impacts was applied to determine aquatic impacts. The CWA Section 404(b)(1) guidelines call for the Least Environmentally Damaging Practicable Alternative (LEDPA) to be selected to address impacts to wetlands, streams, and other waters of the United States;
- Discuss potential wetland and stream mitigation requirements, if applicable;
- Discuss the current conditions of surface water resources and potential impacts from the proposed project (e.g., impacts to Clean Water Act (CWA) Section 303(d)-listed water bodies and their impaired status);
- Describe proposed measures to capture and filter stormwater runoff, preliminary drainage design, and proposed stormwater filtration;

- Discuss whether sediments that would need to be dredged from Brickhouse Slough and Commander's Pond have been tested, and where clean dredged materials will be placed.
- Consider beneficial re-use of dredged materials.

PROJECT DESIGN / PROJECT STAGING

As the studies of alternatives progresses and design advances, ensure the Draft EA considers the following:

Recommendations for the Draft EA:

- Consider impacts on existing infrastructure (e.g., drinking water intake locations, sewer/septic, utilities, stormwater and effluent discharge point sources, existing public and private piers and boat ramps) and how construction would impact or otherwise affect this infrastructure.
- Provide information on contractor staging locations, access routes and locations, and mobilization.
- Ensure that the wetland delineation to be undertaken includes all staging locations and that all staging and access road areas are investigated for the presence of regulated water resources.
- Provide maps and figures showing all staging, access, and temporary road/mobilization locations, including areas of work within waterways.
- Provide information on coordination with the state resource agencies regarding required permitting, and any required mitigation for proposed work.

ENVIRONMENTAL JUSTICE AND CHILDREN'S HEALTH

DoA should analyze if construction, operation, and maintenance of the proposed project will impact communities with environmental justice (EJ) concerns. Our recommendations below suggest opportunities to further analyze, disclose, and reduce such impacts.

Recommendations for the Draft EA:

- Identify the presence of low-income and/or minority communities within the project area and within the broader area that could experience environmental impacts from the proposed project. Disclose demographic information and summarize input from community members.
- Describe past activities and future plans to engage minority populations, low-income populations, and Tribes during the environmental review and planning phase, and, if the project commences, during construction and operations.
- Evaluate the impacts of this proposal on low-income and/or minority communities and sensitive receptors (e.g., children, people with asthma, etc.).
- Include an analysis and conclusion regarding whether the Proposed Action or any action alternatives may have disproportionately high and adverse impacts on low income or minority communities, as specified in CEQ's Environmental Justice Guidance.⁴

⁴ CEQ's Environmental Justice Guidance Under the National Environmental Policy Act. See Section III, Part C-4. https://www.epa.gov/sites/default/files/2015-02/documents/ej_guidance_nepa_ceq1297.pdf?VersionId=78iNGtdwSTz5E2x.H0aHq.E96_Tphbgd

- Compare project impacts on low-income and minority populations with an appropriate reference community to determine whether there may be disproportionate impacts. Consider risk of exposure to hazardous/toxic materials associated with the proposed construction and operation and air quality and noise impacts due to construction.
- Consider any disproportionate non-project-related pollution exposures that communities of concern may already be experiencing, as well as any disproportionate non-pollution stressors that may make the communities susceptible to pollution, such as health conditions, other social determinants of health, and disproportionate vulnerability related to climate change.
- Identify measures to (1) ensure meaningful community engagement; (2) minimize adverse community impacts; and (3) avoid disproportionate impacts to communities with EJ concerns.
- Use census-tract-level information to initially help locate communities with EJ concerns. For initial screening, use EPA's EJSCREEN5 mapping tool.
- In conducting the EJ analysis, utilize resources such as the Promising Practices Report6 and the Community Guide to EJ and NEPA Methods7 to appropriately engage in meaningful, targeted, community outreach, analyze impacts, and advance environmental justice principles through NEPA implementation.
- Consider cumulative environmental impacts to minority populations, low-income populations, Tribes, and indigenous peoples in the project area within the environmental justice analysis and disclose conclusions on those impacts.
- Provide an analysis and findings as to whether the Proposed Project and all alternatives, including the No Action Alternative, would likely have disproportionate adverse impacts on minority populations, low-income populations, or Tribes. Identify what those impacts may be and include measures that DoA will take to avoid, minimize, or mitigate impacts.
- Establish material hauling routes away from places where children live, learn, and play, to the extent feasible. Consider homes, schools, daycares, and playgrounds. In addition to air quality benefits, careful routing may protect children from vehicle-pedestrian accidents. Identify potential material hauling routes in the Draft EA.

CLIMATE CHANGE

Executive Order 14008: Tackling the Climate Crisis at Home and Abroad states, "The United States and the world face a profound climate crisis. We have a narrow moment to pursue action...to avoid the most catastrophic impacts of that crisis and to seize the opportunity that tackling climate change presents." The U.S. Global Change Research Program's National Climate Assessment provides data and scenarios that may be helpful in assessing trends in temperature, precipitation, and frequency and severity of storm events.⁸

⁵ <http://www.epa.gov/ejscreen>

⁶ https://www.epa.gov/sites/default/files/2016-08/documents/nepa_promising_practices_document_2016.pdf

⁷ <https://www.energy.gov/sites/prod/files/2019/05/f63/NEPA%20Community%20Guide%202019.pdf>

⁸ Information on changing climate conditions is available through the National Climate Assessment at: <https://nca2023.globalchange.gov/>

Any Action Alternative would directly release greenhouse gas (GHG) emissions during construction from trucks hauling materials, workers' vehicles, and operation of construction equipment. It is important for the Draft EA to fully quantify and adequately disclose the impacts of the GHG emissions from the No Action alternative and all action alternatives and discuss the implications of those emissions in light of science-based policies established to avoid the worsening impacts of climate change.

Federal courts have consistently held that NEPA requires agencies to disclose and consider climate impacts in their reviews, including impacts from GHG emissions. On January 9, 2023, the Council on Environmental Quality (CEQ) published interim guidance to assist Federal agencies in assessing and disclosing climate change impacts during environmental reviews⁹. CEQ developed this interim guidance in response to Executive Order 13990 - Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis. This interim guidance was effective immediately. CEQ indicated that agencies should use this interim guidance to inform the NEPA review for all new proposed actions and may use it for evaluations in process, as agencies deem appropriate, such as informing the consideration of alternatives or helping address comments raised through the public comment process. EPA recommends that DoA apply the interim guidance as appropriate, to ensure robust consideration of potential climate impacts, mitigation, and adaptation issues.

In addition, estimates of the social cost of greenhouse gases (SC-GHG¹⁰) are informative for assessing the impacts of GHG emissions. SC-GHG estimates allow analysts to monetize the societal value of changes in GHG emissions from actions that have small, or marginal, impacts on cumulative global emissions. Estimates of the social cost of carbon (SC-CO₂) and other greenhouse gases (e.g., social cost of methane (SC-CH₄)) have been used for over a decade in Federal government analyses. Quantification of anticipated GHG releases and associated SC-GHG comparisons among all alternatives (including the No Action Alternative scenarios) within the Draft EA would inform project decision-making and provide clear support for implementing all practicable measures to minimize GHG emissions and releases.

Recommendations for the Draft EA: DoA should apply the interim guidance as appropriate, to ensure robust consideration of potential climate impacts, mitigation, and adaptation issues. Additional recommendations are as follows:

Emissions & SC-GHG Disclosure and Analysis

- Include a detailed discussion of the project's reasonably foreseeable direct and indirect GHG emissions in the context of actions necessary to achieve Illinois' policies and GHG

⁹ <https://www.federalregister.gov/documents/2023/01/09/2023-00158/national-environmental-policy-act-guidance-on-consideration-of-greenhouse-gas-emissions-and-climate>

¹⁰ EPA uses the general term, "social cost of greenhouse gases" (SC-GHG), where possible because analysis of GHGs other than CO₂ are also relevant when assessing the climate damages resulting from GHG emissions. The social cost of carbon (SC-CO₂), social cost of methane (SC-CH₄), and social cost of nitrous oxide (SC-N₂O) can collectively be referenced as the SC-GHG.

emission reduction goals¹¹ as well as national policy and GHG emission reduction goals over the anticipated project lifetime, including the U.S. 2030 Paris targets and the 2050 goal for net-zero energy emissions.

- Quantify estimates of all direct and indirect GHG emissions¹² from the proposed project over its anticipated lifetime for all alternatives, including the No Action Alternative, broken out by GHG type. Include and analyze potential upstream and downstream GHG emissions.
- Use SC-GHG estimates to disclose and consider the climate damages from net changes in direct and indirect emissions of CO₂ and other GHGs resulting from the proposed project. To do so, EPA recommends a breakdown of estimated net GHG emission changes by individual gas, rather than relying on CO₂-equivalent (CO₂e) estimates, and then monetize the climate impacts associated with each GHG using the corresponding social cost estimate (i.e., monetize CH₄ emissions changes expected to occur with the social cost of methane (SC-CH₄) estimate for emissions).¹³ When applying SC-GHG estimates, just as with tools to quantify emissions, USGS should disclose the assumptions (e.g., discount rates) and uncertainties associated with such analysis and the need for updates over time to reflect evolving science and economics of climate impacts.
- Use comparisons of GHG emissions and SC-GHG across alternatives to inform project decision-making.

Resilience and Adaptation

- Describe changing climate conditions (i.e., temperatures and frequency and severity of storm events) and assess how such changes could impact the proposed project and the environmental impacts of the proposed project and alternatives. Consider increases in frequency and severity of storm events, flooding, drought, and periods of high heat. Discuss how stormwater infrastructure could be designed to decrease impacts to aquatic resources.
- Incorporate robust climate resilience and adaption considerations into (1) project design and engineering; (2) construction oversight; (3) commitments for protective measures related to stormwater and erosion; and (4) routine monitoring. The Draft EA should describe how DoA has addressed such considerations and provide a rationale for any reasonable alternatives to enhance resilience that were not adopted or discussed in detail.

¹¹ Including, but not limited to, the goals for Illinois laid out here: https://www2.illinois.gov/ISNews/23893-Climate_and_Equitable_Jobs_Act.pdf

¹² As discussed in Section IV(A) of CEQ's 2023 interim guidance, "agencies generally should quantify all reasonably foreseeable emissions associated with a proposed action and reasonable alternatives (as well as the no-action alternative). Quantification should include the reasonably foreseeable direct and indirect GHG emissions of their proposed actions. Agencies also should disclose the information and any assumptions used in the analysis and explain any uncertainty. In assessing a proposed action's, and reasonable alternatives', reasonably foreseeable direct and indirect GHG emissions, the agency should use the best available information."

¹³ Transforming gases into CO₂e using Global Warming Potential (GWP) metrics, and then multiplying the CO₂e tons by the SC-CO₂, is not as accurate as a direct calculation of the social costs of non-CO₂ GHGs. This is because GHGs differ not just in their potential to absorb infrared radiation over a given time frame, but also in the temporal pathway of their impact on radiative forcing and in their impacts on physical endpoints other than temperature change, both of which are relevant for estimating their social cost but not reflected in the GWP. See the Interagency Working Group on Social Cost of Greenhouse Gases' February 2021 *Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide Interim Estimates under Executive Order 13990* for more discussion and the range of annual SC-CO₂, SC-CH₄, and SC-N₂O estimates currently used in Federal benefit-costs analyses.

Reduction and Mitigation

- Identify practices to reduce and mitigate GHG emissions; include commitments by DoA and LRA to do so in the Draft EA. We recommend DoA consider practices in the enclosed Construction Emission Control Checklist.
- Analyze best available control strategies, while considering low sensitive environmental and health receptors (e.g., schools and play areas along truck travel routes).

ENERGY EFFICIENCY AND ENVIRONMENTAL BEST PRACTICES

Energy efficient design and material selection could reduce operations costs and promote a high-quality work environment, while also better protecting the environment. Recycling construction debris also preserves valuable landfill space and makes use of materials that have high embodied energy.

Recommendations for the Draft EA: DoA should consider committing to the following:

- Achieving Leadership in Energy & Environmental Design (LEED) certification at the platinum level (or design for net-zero energy usage) for any new buildings associated with the project. Best practices for energy efficiency and sustainable building design can include the use of energy-efficient building materials, such as south-facing skylights and windows, motion sensed lighting, solar, wind, and/or geothermal power, and Energy Star certified windows and doors. In addition to reducing the overall environmental footprint, green building certification programs promote health by encouraging practices that protect indoor air quality. At a minimum, EPA encourages DoA to commit to analyze the strengths and feasibility of these strategies;
- Constructing proposed roads, parking lots, sidewalks, or other surfaces slated for driving or walking with using permeable pavement or porous pavers to reduce runoff;
- Identifying and implementing of opportunities for additional green stormwater management practices. Opportunities include, but are not limited to, green roofs, bioswales, and rain gardens;
- Ensuring areas around all new buildings associated with the project which are not planned for operations be considered for conversion to native habitats, increasing the area which can be beneficially used for wildlife, stormwater infiltration or detention, and aesthetics, among other functions;
- Discussing to what extent DoA will require energy efficiency measures, greenhouse gas reductions, and other sustainability measures, per Executive Order 13693;
- Incorporating electric vehicle charging stations in new parking areas and designating priority parking spots for carpools and low emission vehicles;
- Committing to recycle a high percentage of construction and demolition debris;
- Replacing raw materials with recycled materials for infrastructure components. Options include, but are not limited to:
 - Using recycled materials to replace carbon-intensive Portland Cement in concrete as “supplementary cementitious material;”
 - Using tire-derived aggregate in lightweight embankment fill and retaining wall backfill; and

- Using recycled materials in pavement applications, such as crushed recycled concrete, recycled asphalt pavement, and rubberized asphalt concrete. Also, in some circumstances, demolished onsite asphalt can be re-used (e.g., cold in-place recycling or full depth reclamation).

NATURAL FEATURES

The Refuge borders Parcel 20 on three side that includes all water access routes to the Mississippi River. It appears that proposed re-use will extend into Refuge lands.

Recommendations for the Draft EA:

- Discuss coordination with the U.S. Fish and Wildlife Service regarding potential impacts to the Refuge and whether proposed activities are compatible uses of Refuge lands and waters. Consider activities associated with construction (e.g., installing utilities on Refuge lands) as well as operation of proposed features; and
- Discuss potential impact to Federally-listed threatened or endangered species listed in Table ES-2. The fact that critical habitat has not been designated for these species does not equate to an analysis of potential impacts to the species themselves as a result of the proposed re-use plan. In particular, consider impacts to mussel species.

NON-NATIVE INVASIVE SPECIES (NNIS)

Based on the proximity of the project area to the Refuge and the Mississippi River, the potential for the proposed project to spread terrestrial and aquatic NNIS is high. Care needs to be taken to reduce the spread of NNIS during project planning and implementation.

Recommendations for the Draft EA:

- Provide baseline information pertaining to current locations and acreages of terrestrial and aquatic NNIS on project lands;
- Discuss how the project will comply with Executive Order 13112 – Safeguarding the Nation from the Impacts of Invasive Species. include a discussion of standard best management practices (e.g., washing construction equipment) that will be used to eliminate the spread of NNIS into, as well as out of, the project area; and
- Assuming NNIS are present in the project area, discuss measures that can be taken to control or eradicate existing populations, ideally before earthmoving activities begin.

CUMULATIVE IMPACTS ANALYSIS

Development along the Mississippi River has a lengthy history. Cumulative impacts are impacts resulting from the proposed action's incremental impacts when added to the impacts of other past, present, and reasonably-foreseeable future actions, including those under the control of other entities.

Recommendations for the Draft EA:

- Discuss potential direct, indirect and cumulative impacts to resources in the project area that could be affected by the proposed project; and

- Consider reasonably-foreseeable impacts as a result of the proposed project (e.g., roadway improvements, induced growth, etc.). Regional or county-wide smart growth or land use plans should inform the discussion of induced growth and cumulative impacts.

INTERAGENCY COORDINATION

The Draft EA should include a list of all Federal, state, and local permits that will be required to undertake the preferred alternative. For all environmental impact categories requiring coordination with other Federal and state resource agencies, EPA recommends copies of both your letters to those agencies, as well as the responses from those agencies, be provided as appendices to the Draft EA.

OTHER COMMENTS

EPA recommends all technical terms be explained in plain language in the Draft EA.

The scoping letter requests information EPA may have regarding environmental resources in the project area. We invite DoA to access the following databases to obtain environmental information related to the project area:

- WATERS¹⁴: <https://www.epa.gov/waterdata/waters-watershed-assessment-tracking-environmental-results-system>
- Envirofacts¹⁵: <https://www3.epa.gov/enviro/facts/multisystem.html>
- EJSCEEN: <https://www.epa.gov/ejscreen>
- NEPAassist: <https://www.epa.gov/nepa/nepassist>
- CWA 303(3) Listed Impaired Waters: <https://www.epa.gov/exposure-assessment-models/303d-listed-impaired-waters>
- National Ambient Air Quality Standards status: https://www3.epa.gov/airquality/greenbook/anayo_il.html

¹⁴ The **Watershed Assessment, Tracking & Environmental Results System (WATERS)** unites water quality information previously available only from several independent and unconnected databases.

¹⁵ Includes enforcement and compliance information.

U.S. Environmental Protection Agency **Construction Emission Control Checklist**

Diesel emissions and fugitive dust from project construction may pose environmental and human health risks and should be minimized. In 2002, EPA classified diesel emissions as a likely human carcinogen, and in 2012 the International Agency for Research on Cancer concluded that diesel exhaust is carcinogenic to humans. Acute exposures can lead to other health problems, such as eye and nose irritation, headaches, nausea, asthma, and other respiratory system issues. Longer term exposure may worsen heart and lung disease.¹ We recommend DoA consider the following protective measures and commit to applicable measures in the Draft EA.

Mobile and Stationary Source Diesel Controls

Purchase or solicit bids that require the use of vehicles that are equipped with zero-emission technologies or the most advanced emission control systems available. Commit to the best available emissions control technologies for project equipment to meet the following standards.

- On-Highway Vehicles: On-highway vehicles should meet, or exceed, the EPA exhaust emissions standards for model year 2010 and newer heavy-duty, on-highway compression-ignition engines (e.g., long-haul trucks, refuse haulers, shuttle buses, etc.).²
- Non-road Vehicles and Equipment: Non-road vehicles and equipment should meet, or exceed, the EPA Tier 4 exhaust emissions standards for heavy-duty, non-road compression-ignition engines (e.g., construction equipment, non-road trucks, etc.).³
- Marine Vessels: Marine vessels hauling materials for infrastructure projects should meet, or exceed, the latest EPA exhaust emissions standards for marine compression-ignition engines (e.g., Tier 4 for Category 1 & 2 vessels, and Tier 3 for Category 3 vessels).⁴
- Low Emission Equipment Exemptions: The equipment specifications outlined above should be met unless: 1) a piece of specialized equipment is not available for purchase or lease within the United States; or 2) the relevant project contractor has been awarded funds to retrofit existing equipment, or purchase/lease new equipment, but the funds are not yet available.

Consider requiring the following best practices through the construction contracting or oversight process:

- Establish and enforce a clear anti-idling policy for the construction site.
- Use onsite renewable electricity generation and/or grid-based electricity rather than diesel-powered generators or other equipment.
- Use electric starting aids such as block heaters with older vehicles to warm the engine.
- Regularly maintain diesel engines to keep exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance (e.g., blue/black smoke indicates that an engine requires servicing or tuning).

¹ Carcinogenicity of diesel-engine and gasoline-engine exhausts and some nitroarenes. *The Lancet*. June 15, 2012

² <http://www.epa.gov/otaq/standards/heavy-duty/hdci-exhaust.htm>

³ <https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-nonroad-engines-and-vehicles>

⁴ <https://www.epa.gov/emission-standards-reference-guide/all-epa-emission-standards>

- Where possible, retrofit older-tier or Tier 0 nonroad engines with an exhaust filtration device before it enters the construction site to capture diesel particulate matter.
- Replace the engines of older vehicles and/or equipment with diesel- or alternatively-fueled engines certified to meet newer, more stringent emissions standards (e.g., plug-in hybrid-electric vehicles, battery-electric vehicles, fuel cell electric vehicles, advanced technology locomotives, etc.), or with zero emissions electric systems. Retire older vehicles, given the significant contribution of vehicle emissions to the poor air quality conditions. Implement programs to encourage the voluntary removal from use and the marketplace of pre-2010 model year on-highway vehicles (e.g., scrappage rebates) and replace them with newer vehicles that meet or exceed the latest EPA exhaust emissions standards, or with zero emissions electric vehicles and/or equipment.

Fugitive Dust Source Controls

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative, where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
- Install wind fencing and phase grading operations where appropriate and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

Occupational Health

- Reduce exposure through work practices and training, such as maintaining filtration devices and training diesel-equipment operators to perform routine inspections.
- Position the exhaust pipe so that diesel fumes are directed away from the operator and nearby workers, reducing the fume concentration to which personnel are exposed.
- Use enclosed, climate-controlled cabs pressurized and equipped with high-efficiency particulate air (HEPA) filters to reduce the operators' exposure to diesel fumes. Pressurization ensures that air moves from inside to outside. HEPA filters ensure that any incoming air is filtered first.
- Use respirators, which are only an interim measure to control exposure to diesel emissions. In most cases, an N95 respirator is adequate. Workers must be trained and fit-tested before they wear respirators. Depending on the type of work being conducted, and if oil is present, concentrations of particulates present will determine the efficiency and type of mask and respirator. Personnel familiar with the selection, care, and use of respirators must perform the fit testing. Respirators must bear a National Institute for Occupational Safety and Health approval number.

NEPA Documentation

- Per Executive Order 13045 on Children's Health⁵, EPA recommends the lead agency and project proponent pay particular attention to worksite proximity to places where children live, learn, and

⁵ Children may be more highly exposed to contaminants because they generally eat more food, drink more water, and have higher inhalation rates relative to their size. Also, children's normal activities, such as putting their hands in their mouths or playing on the ground, can result in higher exposures to contaminants as compared with adults. Children may be more

play, such as homes, schools, and playgrounds. Construction emission reduction measures should be strictly implemented near these locations in order to be protective of children's health.

- Specify how impacts to sensitive receptors, such as children, elderly, and the infirm will be minimized. For example, locate construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.

vulnerable to the toxic effects of contaminants because their bodies and systems are not fully developed, and their growing organs are more easily harmed. EPA views childhood as a sequence of life stages, from conception through fetal development, infancy, and adolescence.

**REGION 5**

CHICAGO, IL 60604

February 2, 2024

Thomas Lineer, BRAC Program Manager
Department of the Army
Savanna Army Depot Activity
18935 B Street
Savanna, Illinois 61074

Re: EPA Scoping Comments – BRAC Disposal and Re-use of Local Redevelopment Authority Parcel 20, Former Savanna Army Depot, Carroll and Jo Davies Counties, Illinois

Dear Mr. Lineer,

The U.S. Environmental Protection Agency (EPA) has reviewed the Department of the Army's (DoA) November 27, 2023, scoping request for reuse of a 132-acre parcel of the Savanna Army Depot Activity (SVAD) and expected subsequent reuse of this acreage. This letter provides EPA's comments on the scoping request and Jo Carroll Depot Local Redevelopment Authority Final Reuse Plan for Parcel 20, Former Savanna Army Depot, dated June 2023 (hereinafter the Parcel 20 Reuse Plan), pursuant to our authorities under the National Environmental Policy Act (NEPA), the Council on Environmental Quality's (CEQ) NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

The SVAD site is a 13,062-acre former DoA installation located on the eastern bank of the Mississippi River, seven miles north of Savanna, Illinois. Between 1917 and 1995, the DoA used the property for artillery weapons and ammunition testing, storage of ordnance, and the loading and renovating of shells and bombs. The 1995 Base Realignment and Closure (BRAC) Commission recommended closure of SVAD, and the DoA officially closed SVAD in 2000. The DoA has been conducting environmental remediation to clean-up surplus property in preparation for eventual property transfer.

On January 17, 2018, the DoA published notice in the Federal Register indicating surplus property was available at SVAD for public benefit purposes and that the Jo Carroll Depot Local Redevelopment Authority (LRA) had been recognized by the Department of Defense as the Local Redevelopment Authority for this surplus property. The LRA performed an analysis (the Parcel 20 Reuse Plan) in support of reuse planning for LRA Parcel 20, which covers 132 acres, for DoA's use when preparing the NEPA scoping document.

LRA Parcel 20 is 132 acres of undeveloped land within the SVAD. It is bordered by the Upper Mississippi River National Wildlife and Fish Refuge (Refuge) to the west, the Apple River to the east and

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south, and the Mississippi River to the west. The Parcel includes low-lying areas associated with the Apple River, Brickhouse Slough, and Commander's Pond. An active Burlington Northern Santa Fe Railway line bisects the Parcel from northwest to southeast but is not part of the Parcel under consideration for transfer. Parcel 20 lies almost completely within the floodplain and is adjacent to the Refuge.

The LRA presented DoA with three conceptual reuse alternatives for redevelopment of LRA Parcel 20. The LRA's primary focus consists of a no-cost economic development conveyance; each of the three conceptual reuse alternatives proposes commercial and industrial development and passive recreational development. Since publishing its reuse plan, the LRA also indicated interest in an interim use lease agreement and/or early transfer agreement that would permit construction of a solar energy facility atop an existing capped landfill located within LRA Parcel 20.

Three conceptual alternatives for redevelopment of Parcel 20 were identified in the scoping document as follows:

Alternative 1 (Brickhouse Slough) - This alternative prioritizes fleet¹ development of a dry bulk and liquid bulk wharf on the Brickhouse Slough and recreational use. Key port infrastructure includes a barge fleeting area, an 800 foot dry and liquid bulk wharf, a floating dry dock, a wharf access road, a haul road, a liquid bulk pipeline, and a conveyor system.

Alternative 2 (Commander's Pond Lite) – This alternative expands on Alternative 1 and adds a 600-foot lift-on/lift-off wharf to allow the handling of two 250-foot barges simultaneously to support expansion of specialty and breakbulk cargos and dry dock capacity. This concept would require approximately 18 acres of dredging within the Commander's Pond area to support access to Brickhouse Slough.

Alternative 3 (Commander's Pond Full) – This alternative expands on Alternative 2 and adds additional port support to include an additional 350-foot lift-on/lift-off wharf to allow the handling of two 250-foot barges simultaneously, a repair fleeting area, and the inclusion of an aquatic habitat restoration area. This concept would require approximately 42 acres of dredging within the Commander's Pond area with 26 acres to support cargo activities and the remaining 16 acres dedicated for aquatic habitat restoration.

The LRA preferred alternative is Alternative 3. The scoping information indicates the timing for capital expenditures is not fully established and will depend in large part on market interest and development participation by private partners as well as regulatory and permitting issues. To facilitate implementation, the alternatives are designed to phase into each other seamlessly and sequentially. For example, Alternative 1 could be initiated immediately with a target five-year completion window, while Alternatives 2 and 3 could follow in a five-year plus completion window.

According to the scoping information, the development of these parcels by the LRA could not occur if the land was not transferred to it by the DoA. According to NEPA regulations, connected actions are

¹ Fleeting would provide "parking areas" while cargo is being loaded/offloaded.

those actions that could not or would not occur but for another action (e.g., the proposed land transfer from DoA to LRA). Connected actions must be analyzed in the same NEPA document, because the environmental impacts generated from the non-DoA action would not occur but for the DoA action of transferring Parcel 20.²

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cont'd

EPA's detailed NEPA scoping comments are enclosed with this letter. We recommend that the forthcoming Draft Environmental Assessment (EA) address these comments and our recommendations, which generally relate to Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) sites, impacts to wetlands and aquatic resources, environmental justice, greenhouse gases and climate change, project design and environmental best practices, natural features, and non-native, invasive species.

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Thank you for the opportunity to review and provide comments at this stage of project development. Please send an electronic copy of future NEPA documents to R5NEPA@epa.gov. If you would like to discuss the contents of this letter further, please contact Kathy Kowal, lead NEPA reviewer for this project, at kowal.kathleen@epa.gov. Ms. Kowal is also available at 312-353-5206

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Sincerely,

KRYSTLE
MCCLAIN

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KRYSTLE MCCLAIN

Date: 2024.02.02
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Krystle Z. McClain, P.E.
NEPA Program Supervisor
Tribal and Multimedia Programs Office

Enclosures:

EPA Detailed Scoping Comments
Construction Emission Control Checklist

Cc (with enclosures):

William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity
Ed Britton, Upper Mississippi River National Wildlife and Fish Refuge
Charlene Falco, Illinois Environmental Protection Agency
Bradley Hayes, Illinois Department of Natural Resources
Nicole Goers, U.S. Environmental Protection Agency

² 40 CFR 1508.25 (a)(1))

**EPA's Detailed Scoping Comments: Implementation of BRAC Disposal and
Re-use of LRA Parcel 20 Former Savanna Army Depot
Carroll and Jo Davies Counties, Illinois**

February 2, 2024

COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT (CERCLA) SITES

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LRA Parcel 20 includes CERCLA sites which were previously investigated [e.g., Site 20 (Abandoned Landfill), Site 73 (Stables Landfill), Site 77 (1917-Era Powder Magazines), Site 130 (Vincent Road Septic System), Shop Area (Buildings 100 through 129 Sanitary and Stormwater Sewer lines and Outfalls to Site 178 and Site 178 (Ordnance School Lake, also known as Commander's Pond)]. Based on information available to EPA, the current status of the CERCLA sites is as follows:

- **Site 20 (Abandoned Landfill):**

According to the *Final Record of Decision, Site 20 – Abandoned Landfill and Site 99 – Building 762, CF Plant Battery Shop and Leaching Pits, Savanna Army Depot Activity, Savanna, Illinois*, dated June 2016 (Site 20 Record of Decision (ROD)), the selected remedy included landfill capping with hotspot removal, long-term groundwater monitoring, and land use controls (LUCs). Based on the *Final Land Use Control Implementation Plan, Site 20 Abandoned Landfill, Savanna Army Depot Activity, Savanna, Illinois*, dated October 2019 (Site 20 LUCIP), the institutional and engineering controls for Site 20 include:

- environmental covenants to prohibit residential use, access to groundwater, and intrusive activities (including agricultural use) at the site;
- Illinois Environmental Protection Agency (Illinois EPA), DoA, and EPA review of LUC inspections and approval processes;
- maintenance of a vegetated engineered landfill cap constructed with at least 2 feet of compacted clay and 6 inches of top soil and turf reinforcement mat including the intended vegetative cover and the underlying soil such that erosion gullies and localized settlement do not occur;
- use of site boundaries to limit site access: wetlands and the Apple River form the northeastern, eastern, and southern boundaries and a railroad right-of-way and fencing along the western boundary of the site; and,
- signs and engineered cap delineation posts are installed along the boundary of the site.

Based on the *Final Second Five-Year Review Report for Savanna Army Depot Activity Superfund Site, Savanna, Jo Daviess and Carroll Counties, Illinois*, dated June 2020 (2nd FYR), the excavation, offsite disposal of soil, and installation of a vegetated engineered landfill cap have been completed. However, the UECA [Uniform Environmental Covenants Act] environmental covenants have not been executed. Groundwater monitoring is still ongoing.

- **Site 73 (Stables Landfill):**

According to the *Final Record of Decision, Site 73 – Stable Landfill and Site 178 – Ordnance School Lake, Savanna Army Depot Activity, Savanna, Illinois*, dated August 2016 (Sites 73 & 178 ROD), the

selected remedy for Site 73 includes “[R]emoval and disposal of bulk debris and drums as nonhazardous waste following appropriate characterization; excavation of soil containing COCs [contaminants of concern] at concentrations above the remediation goals for residential use; transportation of the excavated debris and soil to a RCRA [Resource Conservation and Recovery Act] Subtitle D permitted facility (assuming the soil is nonhazardous); and, restoration of the site, which may include restoration of disturbed wetlands.”

Based on the 2nd FYR, “Remedial action was completed in December 2018 and the completion report is in the final stages. Site meets requirements for unrestricted use.”

- **Site 178 (Ordnance School Lake also known as Commander’s Pond):**

According to the Sites 73 & 178 ROD, the selected remedy for Site 178 includes “[E]xcavation of outfall surface soil and sediment along the western shoreline containing COCs at concentrations above recreational remediation goals; transportation of excavated material to a RCRA Subtitle D permitted facility for disposal (assuming the material is nonhazardous); site restoration, including regrading and/or bank stabilization; implementation of administrative LUCs (e.g., zoning laws) to maintain recreational or industrial/commercial use of the property; development of a Land Use Control Implementation Plan (LUCIP) to document strategies for implementing, maintaining, monitoring, and enforcing LUCs at the site; and, periodic monitoring of the LUCs conducted annually and as part of CERCLA 5-year reviews; in the event that the site changes land use designation, the 5-year review will be used as a mechanism to determine if the site conditions require a modification or amendment to the site controls.”

Based on the 2nd FYR, “[E]xcavation and offsite disposal was conducted in December 2018. LUC Implementation Plan (LUCIP) is under review. LUCs need to be implemented.”

- **Site 77 (1917-Era Powder Magazines) and Site 130 (Vincent Road Septic System):**

Sites 77 and 130 were initially evaluated and determined not to require further investigation or remediation.

EPA Concerns and Recommendations³ for the forthcoming Draft EA:

Given the current status of the CERCLA sites above, EPA has identified the following issues with regard to information contained in the scoping request and the Parcel 20 Reuse Plan:

- **Issue 1:** The Scoping Request and the Parcel 20 Reuse Plan did not discuss how LUCs will be implemented and maintained under the conceptual redevelopment alternatives. As such, it is unclear if any of the three proposed reuse alternatives presented in the Parcel 20 Reuse Plan would impact the implementation of required LUCs that are established in the respective RODs for Sites 20 and 178. For example, the Parcel 20 Reuse Plan states, “The existing landfill area has potential space for a public gathering area and may include parking, recreational fields, a dog park, and gathering spaces such as picnic tables or

³ The issues and recommendations provided herein do not represent a comprehensive regulatory and permitting review of the Parcel 20 Reuse Plan. Should the property be transferred, the EPA and other appropriate parties should be contacted regarding pertinent regulations and permitting requirements.

gazebos;" however, there is no mention of the Site 20 LUCIP LUCs to "Protect human receptors from contact with the soil COCs and the landfill waste. Maintain the site in accordance with the Operation and Maintenance Plan and as required by 35 Illinois Administrative Code [IAC] 811.111" or "Prohibit unauthorized intrusive activity into or excavation of the landfill cap" in the scoping request or Parcel 20 Reuse Plan. Further, the Site 178 (Ordnance School Lake) land use control implementation plan (LUCIP) is still under development and has yet to be reviewed and approved by regulators.

- Issue 2: Section 3.4 [Ordnance and Explosives (OE) and Munitions Debris (MD)] of the Parcel 20 Reuse Plan indicates that Sites 20 and 73, "were confirmed disposal areas for munitions constituents based on historical contamination detected in the landfills, and uncontrolled dumping of munitions and munitions constituents may have occurred throughout Parcel 20." However, the scoping request and Parcel 20 Reuse Plan do not discuss how potential exposure to munitions and munitions constituents will be mitigated. This is of particular concern given the proposed recreation areas and proposed recreational trails included in the conceptual redevelopment alternatives.
- Issue 3: The scoping request states, "Since publishing its reuse plan, the LRA also has indicated its interest in an interim use lease agreement and/or an early transfer agreement that would allow construction of a solar energy facility atop the capped landfill within LRA Parcel 20;" however, no further details were provided. For example, it is unclear how the construction of a solar energy facility atop the capped landfill at Site 20 will meet the Site 20 LUCIP LUCs to "Protect human receptors from contact with the soil COCs and the landfill waste. Maintain the site in accordance with the Operation and Maintenance Plan and as required by 35 Illinois Administrative Code [IAC] 811.111" or "Prohibit unauthorized intrusive activity into or excavation of the landfill cap."
- Issue 4: Based on Sections 8.2 (Alternative 2: Commander's Pond Lite) and 8.3 (Alternative 3: Commander's Pond Full) of the Parcel 20 Reuse Plan, the conceptual redevelopment alternatives would require approximately 18 to 42 acres to be dredged including areas previously remediated. However, the cost and dredging estimates in Sections 9.2 (Cost Estimates) and 9.3 (Dredging Estimate) of the Parcel 20 Reuse Plan do not include details or costs associated with the management, characterization, or disposal of these dredged sediments. Constituents of concern at Site 178 previously included polynuclear aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), pesticides, and heavy metals. As such, it is unclear if the level of effort needed to dredge Site 178 has been sufficiently estimated.
- Issue 5: To date, the five CERCLA sites associated with LRA Parcel 20 have not been investigated for per- and polyfluoroalkyl substances (PFAS) contamination. As such, it is unclear if the conceptual redevelopment alternatives and associated costing are sufficiently representative should a PFAS remedial action be warranted.

Recommendations for the Draft EA:

- Assuming the Parcel 20 Reuse Plan will be an appendix to a future Draft EA, ensure that revisions to the Parcel 20 Reuse Plan include detailed information regarding the implementation of LUCs under the conceptual redevelopment alternatives, following regulatory approval of the LUCIP for Site 178.

- Ensure the Parcel 20 Reuse Plan clarifies how potential exposure to munitions and munitions constituents will be mitigated.
- Revise the Parcel 20 Reuse Plan to include information about all conceptual redevelopment alternatives and demonstrate that any solar facility components installed on the landfill cover will not adversely affect the final cover system.
- Revise the Parcel 20 Reuse Plan to discuss the management, characterization, and disposal of all sediments to be dredged, and include a discussion on the sediments' impact on costs and schedule. This plan should also include additional characterization of the non-remediated portions of Commander's Pond.
- Ensure the Parcel 20 Reuse Plan discusses how potential exposure to PFAS will be characterized and potentially mitigated given the lack of PFAS characterization of the sites.

WETLANDS/STREAMS/AQUATIC RESOURCES

The scoping information indicates that Parcel 20 provides accessibility to water, roads, and rail, demonstrating access for port-related development. The scoping information indicates that Parcel 20 drains into creeks and sloughs of the Apple and Mississippi Rivers, replenishes groundwater supplies via low areas on the site, and contains bottomland forest. Due to its landscape location, it is likely that Parcel 20 contains wetlands and streams. Fill into wetlands, or fill into, relocation of, or encapsulation of streams may trigger Clean Water Act (CWA) Section 404 permitting and the need for CWA Section 401 water quality certification from the Illinois EPA (IEPA).

Recommendations for the Draft EA:

- Before the Draft EA is released for public review and comment, a formal wetland and Waters of the U.S. delineation should be completed to know definitively where wetlands, streams, and other regulated Waters of the U.S. are located. EPA strongly recommends that this delineation be completed before and included in (as an appendix to) the Draft EA. The Draft EA should provide accurate information on impacts to regulated water resources, and information on how those impacts will be mitigated.
- Identify acreage for both direct (e.g., permanent fill), indirect (e.g., changes in hydrology), and temporary (e.g., temporary fill) impacts to regulated water resources, including wetlands, for each action alternative. Understanding that plans have not yet been developed, using a range to identify impacts would be useful to understand potential impacts (e.g., 100-150 acres of wetland impact);
- Disclose how sequencing established by the CWA Section 404(b)(1) Guidelines, namely, avoidance first, followed by demonstration of impact minimization, and mitigation for unavoidable impacts was applied to determine aquatic impacts. The CWA Section 404(b)(1) guidelines call for the Least Environmentally Damaging Practicable Alternative (LEDPA) to be selected to address impacts to wetlands, streams, and other waters of the United States;
- Discuss potential wetland and stream mitigation requirements, if applicable;
- Discuss the current conditions of surface water resources and potential impacts from the proposed project (e.g., impacts to Clean Water Act (CWA) Section 303(d)-listed water bodies and their impaired status);
- Describe proposed measures to capture and filter stormwater runoff, preliminary drainage design, and proposed stormwater filtration;

- Discuss whether sediments that would need to be dredged from Brickhouse Slough and Commander's Pond have been tested, and where clean dredged materials will be placed.
- Consider beneficial re-use of dredged materials.

PROJECT DESIGN / PROJECT STAGING

As the studies of alternatives progresses and design advances, ensure the Draft EA considers the following:

Recommendations for the Draft EA:

- Consider impacts on existing infrastructure (e.g., drinking water intake locations, sewer/septic, utilities, stormwater and effluent discharge point sources, existing public and private piers and boat ramps) and how construction would impact or otherwise affect this infrastructure.
- Provide information on contractor staging locations, access routes and locations, and mobilization.
- Ensure that the wetland delineation to be undertaken includes all staging locations and that all staging and access road areas are investigated for the presence of regulated water resources.
- Provide maps and figures showing all staging, access, and temporary road/mobilization locations, including areas of work within waterways.
- Provide information on coordination with the state resource agencies regarding required permitting, and any required mitigation for proposed work.

ENVIRONMENTAL JUSTICE AND CHILDREN'S HEALTH

DoA should analyze if construction, operation, and maintenance of the proposed project will impact communities with environmental justice (EJ) concerns. Our recommendations below suggest opportunities to further analyze, disclose, and reduce such impacts.

Recommendations for the Draft EA:

- Identify the presence of low-income and/or minority communities within the project area and within the broader area that could experience environmental impacts from the proposed project. Disclose demographic information and summarize input from community members.
- Describe past activities and future plans to engage minority populations, low-income populations, and Tribes during the environmental review and planning phase, and, if the project commences, during construction and operations.
- Evaluate the impacts of this proposal on low-income and/or minority communities and sensitive receptors (e.g., children, people with asthma, etc.).
- Include an analysis and conclusion regarding whether the Proposed Action or any action alternatives may have disproportionately high and adverse impacts on low income or minority communities, as specified in CEQ's Environmental Justice Guidance.⁴

⁴ CEQ's Environmental Justice Guidance Under the National Environmental Policy Act. See Section III, Part C-4. https://www.epa.gov/sites/default/files/2015-02/documents/ej_guidance_nepa_ceq1297.pdf?VersionId=78iNGtdwSTz5E2x.H0aHq.E96_Tphbgd

- Compare project impacts on low-income and minority populations with an appropriate reference community to determine whether there may be disproportionate impacts. Consider risk of exposure to hazardous/toxic materials associated with the proposed construction and operation and air quality and noise impacts due to construction.
- Consider any disproportionate non-project-related pollution exposures that communities of concern may already be experiencing, as well as any disproportionate non-pollution stressors that may make the communities susceptible to pollution, such as health conditions, other social determinants of health, and disproportionate vulnerability related to climate change.
- Identify measures to (1) ensure meaningful community engagement; (2) minimize adverse community impacts; and (3) avoid disproportionate impacts to communities with EJ concerns.
- Use census-tract-level information to initially help locate communities with EJ concerns. For initial screening, use EPA's EJSCREEN5 mapping tool.
- In conducting the EJ analysis, utilize resources such as the Promising Practices Report6 and the Community Guide to EJ and NEPA Methods7 to appropriately engage in meaningful, targeted, community outreach, analyze impacts, and advance environmental justice principles through NEPA implementation.
- Consider cumulative environmental impacts to minority populations, low-income populations, Tribes, and indigenous peoples in the project area within the environmental justice analysis and disclose conclusions on those impacts.
- Provide an analysis and findings as to whether the Proposed Project and all alternatives, including the No Action Alternative, would likely have disproportionate adverse impacts on minority populations, low-income populations, or Tribes. Identify what those impacts may be and include measures that DoA will take to avoid, minimize, or mitigate impacts.
- Establish material hauling routes away from places where children live, learn, and play, to the extent feasible. Consider homes, schools, daycares, and playgrounds. In addition to air quality benefits, careful routing may protect children from vehicle-pedestrian accidents. Identify potential material hauling routes in the Draft EA.

CLIMATE CHANGE

Executive Order 14008: Tackling the Climate Crisis at Home and Abroad states, "The United States and the world face a profound climate crisis. We have a narrow moment to pursue action...to avoid the most catastrophic impacts of that crisis and to seize the opportunity that tackling climate change presents." The U.S. Global Change Research Program's National Climate Assessment provides data and scenarios that may be helpful in assessing trends in temperature, precipitation, and frequency and severity of storm events.⁸

⁵ <http://www.epa.gov/ejscreen>

⁶ https://www.epa.gov/sites/default/files/2016-08/documents/nepa_promising_practices_document_2016.pdf

⁷ <https://www.energy.gov/sites/prod/files/2019/05/f63/NEPA%20Community%20Guide%202019.pdf>

⁸ Information on changing climate conditions is available through the National Climate Assessment at: <https://nca2023.globalchange.gov/>

Any Action Alternative would directly release greenhouse gas (GHG) emissions during construction from trucks hauling materials, workers' vehicles, and operation of construction equipment. It is important for the Draft EA to fully quantify and adequately disclose the impacts of the GHG emissions from the No Action alternative and all action alternatives and discuss the implications of those emissions in light of science-based policies established to avoid the worsening impacts of climate change.

Federal courts have consistently held that NEPA requires agencies to disclose and consider climate impacts in their reviews, including impacts from GHG emissions. On January 9, 2023, the Council on Environmental Quality (CEQ) published interim guidance to assist Federal agencies in assessing and disclosing climate change impacts during environmental reviews⁹. CEQ developed this interim guidance in response to Executive Order 13990 - Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis. This interim guidance was effective immediately. CEQ indicated that agencies should use this interim guidance to inform the NEPA review for all new proposed actions and may use it for evaluations in process, as agencies deem appropriate, such as informing the consideration of alternatives or helping address comments raised through the public comment process. EPA recommends that DoA apply the interim guidance as appropriate, to ensure robust consideration of potential climate impacts, mitigation, and adaptation issues.

In addition, estimates of the social cost of greenhouse gases (SC-GHG¹⁰) are informative for assessing the impacts of GHG emissions. SC-GHG estimates allow analysts to monetize the societal value of changes in GHG emissions from actions that have small, or marginal, impacts on cumulative global emissions. Estimates of the social cost of carbon (SC-CO₂) and other greenhouse gases (e.g., social cost of methane (SC-CH₄)) have been used for over a decade in Federal government analyses. Quantification of anticipated GHG releases and associated SC-GHG comparisons among all alternatives (including the No Action Alternative scenarios) within the Draft EA would inform project decision-making and provide clear support for implementing all practicable measures to minimize GHG emissions and releases.

Recommendations for the Draft EA: DoA should apply the interim guidance as appropriate, to ensure robust consideration of potential climate impacts, mitigation, and adaptation issues. Additional recommendations are as follows:

Emissions & SC-GHG Disclosure and Analysis

- Include a detailed discussion of the project's reasonably foreseeable direct and indirect GHG emissions in the context of actions necessary to achieve Illinois' policies and GHG

⁹ <https://www.federalregister.gov/documents/2023/01/09/2023-00158/national-environmental-policy-act-guidance-on-consideration-of-greenhouse-gas-emissions-and-climate>

¹⁰ EPA uses the general term, "social cost of greenhouse gases" (SC-GHG), where possible because analysis of GHGs other than CO₂ are also relevant when assessing the climate damages resulting from GHG emissions. The social cost of carbon (SC-CO₂), social cost of methane (SC-CH₄), and social cost of nitrous oxide (SC-N₂O) can collectively be referenced as the SC-GHG.

emission reduction goals¹¹ as well as national policy and GHG emission reduction goals over the anticipated project lifetime, including the U.S. 2030 Paris targets and the 2050 goal for net-zero energy emissions.

- Quantify estimates of all direct and indirect GHG emissions¹² from the proposed project over its anticipated lifetime for all alternatives, including the No Action Alternative, broken out by GHG type. Include and analyze potential upstream and downstream GHG emissions.
- Use SC-GHG estimates to disclose and consider the climate damages from net changes in direct and indirect emissions of CO₂ and other GHGs resulting from the proposed project. To do so, EPA recommends a breakdown of estimated net GHG emission changes by individual gas, rather than relying on CO₂-equivalent (CO₂e) estimates, and then monetize the climate impacts associated with each GHG using the corresponding social cost estimate (i.e., monetize CH₄ emissions changes expected to occur with the social cost of methane (SC-CH₄) estimate for emissions).¹³ When applying SC-GHG estimates, just as with tools to quantify emissions, USGS should disclose the assumptions (e.g., discount rates) and uncertainties associated with such analysis and the need for updates over time to reflect evolving science and economics of climate impacts.
- Use comparisons of GHG emissions and SC-GHG across alternatives to inform project decision-making.

Resilience and Adaptation

- Describe changing climate conditions (i.e., temperatures and frequency and severity of storm events) and assess how such changes could impact the proposed project and the environmental impacts of the proposed project and alternatives. Consider increases in frequency and severity of storm events, flooding, drought, and periods of high heat. Discuss how stormwater infrastructure could be designed to decrease impacts to aquatic resources.
- Incorporate robust climate resilience and adaption considerations into (1) project design and engineering; (2) construction oversight; (3) commitments for protective measures related to stormwater and erosion; and (4) routine monitoring. The Draft EA should describe how DoA has addressed such considerations and provide a rationale for any reasonable alternatives to enhance resilience that were not adopted or discussed in detail.

¹¹ Including, but not limited to, the goals for Illinois laid out here: <https://www2.illinois.gov/IISNews/23893-Climate-and-Equitable-Jobs-Act.pdf>

¹² As discussed in Section IV(A) of CEQ's 2023 interim guidance, "agencies generally should quantify all reasonably foreseeable emissions associated with a proposed action and reasonable alternatives (as well as the no-action alternative). Quantification should include the reasonably foreseeable direct and indirect GHG emissions of their proposed actions. Agencies also should disclose the information and any assumptions used in the analysis and explain any uncertainty. In assessing a proposed action's, and reasonable alternatives', reasonably foreseeable direct and indirect GHG emissions, the agency should use the best available information."

¹³ Transforming gases into CO₂e using Global Warming Potential (GWP) metrics, and then multiplying the CO₂e tons by the SC-CO₂, is not as accurate as a direct calculation of the social costs of non-CO₂ GHGs. This is because GHGs differ not just in their potential to absorb infrared radiation over a given time frame, but also in the temporal pathway of their impact on radiative forcing and in their impacts on physical endpoints other than temperature change, both of which are relevant for estimating their social cost but not reflected in the GWP. See the Interagency Working Group on Social Cost of Greenhouse Gases' February 2021 *Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide Interim Estimates under Executive Order 13990* for more discussion and the range of annual SC-CO₂, SC-CH₄, and SC-N₂O estimates currently used in Federal benefit-costs analyses.

Reduction and Mitigation

- Identify practices to reduce and mitigate GHG emissions; include commitments by DoA and LRA to do so in the Draft EA. We recommend DoA consider practices in the enclosed Construction Emission Control Checklist.
- Analyze best available control strategies, while considering low sensitive environmental and health receptors (e.g., schools and play areas along truck travel routes).

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ENERGY EFFICIENCY AND ENVIRONMENTAL BEST PRACTICES

Energy efficient design and material selection could reduce operations costs and promote a high-quality work environment, while also better protecting the environment. Recycling construction debris also preserves valuable landfill space and makes use of materials that have high embodied energy.

063l

Recommendations for the Draft EA: DoA should consider committing to the following:

- Achieving Leadership in Energy & Environmental Design (LEED) certification at the platinum level (or design for net-zero energy usage) for any new buildings associated with the project. Best practices for energy efficiency and sustainable building design can include the use of energy-efficient building materials, such as south-facing skylights and windows, motion sensed lighting, solar, wind, and/or geothermal power, and Energy Star certified windows and doors. In addition to reducing the overall environmental footprint, green building certification programs promote health by encouraging practices that protect indoor air quality. At a minimum, EPA encourages DoA to commit to analyze the strengths and feasibility of these strategies;
- Constructing proposed roads, parking lots, sidewalks, or other surfaces slated for driving or walking with using permeable pavement or porous pavers to reduce runoff;
- Identifying and implementing of opportunities for additional green stormwater management practices. Opportunities include, but are not limited to, green roofs, bioswales, and rain gardens;
- Ensuring areas around all new buildings associated with the project which are not planned for operations be considered for conversion to native habitats, increasing the area which can be beneficially used for wildlife, stormwater infiltration or detention, and aesthetics, among other functions;
- Discussing to what extent DoA will require energy efficiency measures, greenhouse gas reductions, and other sustainability measures, per Executive Order 13693;
- Incorporating electric vehicle charging stations in new parking areas and designating priority parking spots for carpools and low emission vehicles;
- Committing to recycle a high percentage of construction and demolition debris;
- Replacing raw materials with recycled materials for infrastructure components. Options include, but are not limited to:
 - Using recycled materials to replace carbon-intensive Portland Cement in concrete as “supplementary cementitious material;”
 - Using tire-derived aggregate in lightweight embankment fill and retaining wall backfill; and

- Using recycled materials in pavement applications, such as crushed recycled concrete, recycled asphalt pavement, and rubberized asphalt concrete. Also, in some circumstances, demolished onsite asphalt can be re-used (e.g., cold in-place recycling or full depth reclamation).

NATURAL FEATURES

The Refuge borders Parcel 20 on three side that includes all water access routes to the Mississippi River. It appears that proposed re-use will extend into Refuge lands.

063m

Recommendations for the Draft EA:

- Discuss coordination with the U.S. Fish and Wildlife Service regarding potential impacts to the Refuge and whether proposed activities are compatible uses of Refuge lands and waters. Consider activities associated with construction (e.g., installing utilities on Refuge lands) as well as operation of proposed features; and
- Discuss potential impact to Federally-listed threatened or endangered species listed in Table ES-2. The fact that critical habitat has not been designated for these species does not equate to an analysis of potential impacts to the species themselves as a result of the proposed re-use plan. In particular, consider impacts to mussel species.

NON-NATIVE INVASIVE SPECIES (NNIS)

Based on the proximity of the project area to the Refuge and the Mississippi River, the potential for the proposed project to spread terrestrial and aquatic NNIS is high. Care needs to be taken to reduce the spread of NNIS during project planning and implementation.

063n

Recommendations for the Draft EA:

- Provide baseline information pertaining to current locations and acreages of terrestrial and aquatic NNIS on project lands;
- Discuss how the project will comply with Executive Order 13112 – Safeguarding the Nation from the Impacts of Invasive Species. include a discussion of standard best management practices (e.g., washing construction equipment) that will be used to eliminate the spread of NNIS into, as well as out of, the project area; and
- Assuming NNIS are present in the project area, discuss measures that can be taken to control or eradicate existing populations, ideally before earthmoving activities begin.

CUMULATIVE IMPACTS ANALYSIS

Development along the Mississippi River has a lengthy history. Cumulative impacts are impacts resulting from the proposed action's incremental impacts when added to the impacts of other past, present, and reasonably-foreseeable future actions, including those under the control of other entities.

063o

Recommendations for the Draft EA:

- Discuss potential direct, indirect and cumulative impacts to resources in the project area that could be affected by the proposed project; and

- Consider reasonably-foreseeable impacts as a result of the proposed project (e.g., roadway improvements, induced growth, etc.). Regional or county-wide smart growth or land use plans should inform the discussion of induced growth and cumulative impacts.

063o
cont'd

INTERAGENCY COORDINATION

The Draft EA should include a list of all Federal, state, and local permits that will be required to undertake the preferred alternative. For all environmental impact categories requiring coordination with other Federal and state resource agencies, EPA recommends copies of both your letters to those agencies, as well as the responses from those agencies, be provided as appendices to the Draft EA.

063p

OTHER COMMENTS

EPA recommends all technical terms be explained in plain language in the Draft EA.

The scoping letter requests information EPA may have regarding environmental resources in the project area. We invite DoA to access the following databases to obtain environmental information related to the project area:

063q

- WATERS¹⁴: <https://www.epa.gov/waterdata/waters-watershed-assessment-tracking-environmental-results-system>
- Envirofacts¹⁵: <https://www3.epa.gov/enviro/facts/multisystem.html>
- EJScreens: <https://www.epa.gov/ejscreen>
- NEPAassist: <https://www.epa.gov/nepa/nepassist>
- CWA 303(3) Listed Impaired Waters: <https://www.epa.gov/exposure-assessment-models/303d-listed-impaired-waters>
- National Ambient Air Quality Standards status: https://www3.epa.gov/airquality/greenbook/anayo_il.html

¹⁴ The **Watershed Assessment, Tracking & Environmental Results System (WATERS)** unites water quality information previously available only from several independent and unconnected databases.

¹⁵ Includes enforcement and compliance information.

U.S. Environmental Protection Agency **Construction Emission Control Checklist**

Diesel emissions and fugitive dust from project construction may pose environmental and human health risks and should be minimized. In 2002, EPA classified diesel emissions as a likely human carcinogen, and in 2012 the International Agency for Research on Cancer concluded that diesel exhaust is carcinogenic to humans. Acute exposures can lead to other health problems, such as eye and nose irritation, headaches, nausea, asthma, and other respiratory system issues. Longer term exposure may worsen heart and lung disease.¹ We recommend DoA consider the following protective measures and commit to applicable measures in the Draft EA.

Mobile and Stationary Source Diesel Controls

Purchase or solicit bids that require the use of vehicles that are equipped with zero-emission technologies or the most advanced emission control systems available. Commit to the best available emissions control technologies for project equipment to meet the following standards.

- On-Highway Vehicles: On-highway vehicles should meet, or exceed, the EPA exhaust emissions standards for model year 2010 and newer heavy-duty, on-highway compression-ignition engines (e.g., long-haul trucks, refuse haulers, shuttle buses, etc.).²
- Non-road Vehicles and Equipment: Non-road vehicles and equipment should meet, or exceed, the EPA Tier 4 exhaust emissions standards for heavy-duty, non-road compression-ignition engines (e.g., construction equipment, non-road trucks, etc.).³
- Marine Vessels: Marine vessels hauling materials for infrastructure projects should meet, or exceed, the latest EPA exhaust emissions standards for marine compression-ignition engines (e.g., Tier 4 for Category 1 & 2 vessels, and Tier 3 for Category 3 vessels).⁴
- Low Emission Equipment Exemptions: The equipment specifications outlined above should be met unless: 1) a piece of specialized equipment is not available for purchase or lease within the United States; or 2) the relevant project contractor has been awarded funds to retrofit existing equipment, or purchase/lease new equipment, but the funds are not yet available.

Consider requiring the following best practices through the construction contracting or oversight process:

- Establish and enforce a clear anti-idling policy for the construction site.
- Use onsite renewable electricity generation and/or grid-based electricity rather than diesel-powered generators or other equipment.
- Use electric starting aids such as block heaters with older vehicles to warm the engine.
- Regularly maintain diesel engines to keep exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance (e.g., blue/black smoke indicates that an engine requires servicing or tuning).

¹ Carcinogenicity of diesel-engine and gasoline-engine exhausts and some nitroarenes. *The Lancet*. June 15, 2012

² <http://www.epa.gov/otaq/standards/heavy-duty/hdci-exhaust.htm>

³ <https://www.epa.gov/emission-standards-reference-guide/epa-emission-standards-nonroad-engines-and-vehicles>

⁴ <https://www.epa.gov/emission-standards-reference-guide/all-epa-emission-standards>

- Where possible, retrofit older-tier or Tier 0 nonroad engines with an exhaust filtration device before it enters the construction site to capture diesel particulate matter.
- Replace the engines of older vehicles and/or equipment with diesel- or alternatively-fueled engines certified to meet newer, more stringent emissions standards (e.g., plug-in hybrid-electric vehicles, battery-electric vehicles, fuel cell electric vehicles, advanced technology locomotives, etc.), or with zero emissions electric systems. Retire older vehicles, given the significant contribution of vehicle emissions to the poor air quality conditions. Implement programs to encourage the voluntary removal from use and the marketplace of pre-2010 model year on-highway vehicles (e.g., scrappage rebates) and replace them with newer vehicles that meet or exceed the latest EPA exhaust emissions standards, or with zero emissions electric vehicles and/or equipment.

Fugitive Dust Source Controls

- Stabilize open storage piles and disturbed areas by covering and/or applying water or chemical/organic dust palliative, where appropriate. This applies to both inactive and active sites, during workdays, weekends, holidays, and windy conditions.
- Install wind fencing and phase grading operations where appropriate and operate water trucks for stabilization of surfaces under windy conditions.
- When hauling material and operating non-earthmoving equipment, prevent spillage and limit speeds to 15 miles per hour (mph). Limit speed of earth-moving equipment to 10 mph.

Occupational Health

- Reduce exposure through work practices and training, such as maintaining filtration devices and training diesel-equipment operators to perform routine inspections.
- Position the exhaust pipe so that diesel fumes are directed away from the operator and nearby workers, reducing the fume concentration to which personnel are exposed.
- Use enclosed, climate-controlled cabs pressurized and equipped with high-efficiency particulate air (HEPA) filters to reduce the operators' exposure to diesel fumes. Pressurization ensures that air moves from inside to outside. HEPA filters ensure that any incoming air is filtered first.
- Use respirators, which are only an interim measure to control exposure to diesel emissions. In most cases, an N95 respirator is adequate. Workers must be trained and fit-tested before they wear respirators. Depending on the type of work being conducted, and if oil is present, concentrations of particulates present will determine the efficiency and type of mask and respirator. Personnel familiar with the selection, care, and use of respirators must perform the fit testing. Respirators must bear a National Institute for Occupational Safety and Health approval number.

NEPA Documentation

- Per Executive Order 13045 on Children's Health⁵, EPA recommends the lead agency and project proponent pay particular attention to worksite proximity to places where children live, learn, and

⁵ Children may be more highly exposed to contaminants because they generally eat more food, drink more water, and have higher inhalation rates relative to their size. Also, children's normal activities, such as putting their hands in their mouths or playing on the ground, can result in higher exposures to contaminants as compared with adults. Children may be more

play, such as homes, schools, and playgrounds. Construction emission reduction measures should be strictly implemented near these locations in order to be protective of children's health.

- Specify how impacts to sensitive receptors, such as children, elderly, and the infirm will be minimized. For example, locate construction equipment and staging zones away from sensitive receptors and fresh air intakes to buildings and air conditioners.

vulnerable to the toxic effects of contaminants because their bodies and systems are not fully developed, and their growing organs are more easily harmed. EPA views childhood as a sequence of life stages, from conception through fetal development, infancy, and adolescence.



United States Department of the Interior

FISH AND WILDLIFE SERVICE
 Upper Mississippi River National Wildlife and Fish Refuge
 7071 Riverview Road
 Thomson, Illinois 61285
 March 31, 2025



Todd Knuth
 Base Environmental Coordinator
 Savanna Army Depot Activity
 18935 B Street
 Savanna, Illinois 61074

Dear Mr. Knuth:

The Fish and Wildlife Service is providing the following comments on the Parcel 20 EIS Cultural Resources document.

064a

The document identifies: "Enclosure 2: Programmatic Agreement among United States Army, Illinois State Historic Preservation Officer, and Advisory Council on Historic Preservation for the Closure and Disposal of Savanna Army Depot Activity, Illinois" dated August 2000 states under "Section II. Caretaker Maintenance of Historic Properties: During the caretaker period prior to transfer of SVDA properties out of Federal ownership, the Army will ensure the protection of SVDA archeological sites determined to be on, or eligible for inclusion on the National Register. In furtherance of this effort, the Army will develop a plan to protect these sites and will provide the SHPO with a copy of the archeological site protection plan for comment."

064b

In "Enclosure 5: Preservation Covenant...The United States Army (Owner) and the Jo-Carroll Depot LRA (Recipient/Lessee) hereby covenant on behalf of themselves, their successors, and assigns at all times to the Illinois Department of Natural Resources State Historic Preservation Officer (Illinois SHPO) to maintain and preserve archaeological sites 11-CA-1 and 11-CA-142 as follows:

1. The owner and Recipient/Lessee shall preserve and maintain archaeological sites 11-CA-1 and 11-CA-142 in their present condition to preserve and enhance those qualities that make these archaeological sites potentially eligible/eligible for inclusion in the National Register of Historic Places (NRHP).
2. No construction, alteration, or disturbance of the ground surface or any other thing shall be undertaken or permitted to be undertaken on archaeological sites 11-CA-1 and 11-CA-142 that would affect the integrity or the archaeological value of these sites without the express written permission of the Illinois Department of Natural Resources signed by a fully authorized representative thereof."

The document also identifies in "Enclosure 6: Archaeological Sites Directly and Indirectly Effected by the Army's Disposal of LRA Parcel 20". The location of Archaeological Site 11-

CA-142 lies in the middle of the proposed tow/barge access route into Commander's Pond under LRA's proposed Alternatives 2 and 3 (Preferred Alternative). These two archaeological sites will be directly affected by construction activities within Parcel 20. In addition, Site 11-CA-143, lies within the proposed footprint of the Conveyor System/Liquid Pipeline/Wharf Access Road for all three Alternatives.

064b
cont'd

Neither the Cultural Resource EIS document nor the LRA's Reuse Plan identifies a site protection plan for the archaeological sites that will be affected. Both State and Federal policies require that archaeological sites will be protected.

064c

LRA will need to contact Fish and Wildlife Service and apply for an ARPA permit prior to any work that is planned within the Refuge.

064d

Thank you for the opportunity to comment on this Cultural Resource EIS document. Please let me know if you need additional information.

064e

Sincerely,



Ed Britton
Savanna District Manager
Upper Mississippi River National Wildlife and Fish Refuge

From: [McClain, Krystle](#)
To: [William.T.Knuth.civ@army.mil](#); [Lineer, Thomas A CIV USARMY HQDA DCS G-9 \(USA\)](#)
Cc: [Cannella, Michelle](#); [Kowal, Kathleen](#); [Wallace, Carol](#)
Subject: RE: Additional Coordination on Cultural Resources for BRAC of LRA Parcel 20 at SVADA, Illinois
Date: Friday, February 28, 2025 10:30:30 AM
Attachments: [image001.png](#)
[image002.png](#)
[image003.png](#)
[image005.png](#)

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Mr. Lineer and Mr. Knuth,

Thank you for the letter inviting EPA Region 5 to coordinate with the U.S. Army under Section 106 of the National Historic Preservation Act. As this matter is outside of the scope of the EPA's expertise, we encourage the U.S. Army to continue coordination regarding cultural and archaeological resources with the IL SHPO and THPOs, if applicable. We take note of the correspondence, and we look forward to reviewing the forthcoming Draft Environmental Impact Statement to include updates pertaining to the formal Section 106 consultation.

065a

Thanks,

Krystle

 Krystle Z. McClain, P.E.
 NEPA Program Supervisor, Branch 3
 EPA Region 5 | 77 West Jackson Blvd. | Chicago, Illinois 60604
 Email: mcclain.krystle@epa.gov
 Phone: (312) 886-7573

From: Cannella, Michelle <Michelle.Cannella@tetrattech.com>
Sent: Thursday, February 27, 2025 12:34 PM
To: McClain, Krystle <McClain.Krystle@epa.gov>
Cc: Todd Knuth <william.t.knuth.civ@army.mil>; Lineer, Thomas A CIV USARMY HQDA DCS G-9 (USA) <thomas.a.lineer.civ@army.mil>; Hand, Joseph H CIV USARMY CESAM (USA) <Joseph.H.Hand@usace.army.mil>; casey.k.potts@usace.army.mil; Hayes, Beverly <Beverly.Hayes@tetrattech.com>; Webster, Rebecca <REBECCA.WEBSTER@tetrattech.com>
Subject: Additional Coordination on Cultural Resources for BRAC of LRA Parcel 20 at SVADA, Illinois

Caution: This email originated from outside EPA, please exercise additional caution when deciding whether to open attachments or click on provided links.

Good afternoon Ms. McClain:

On behalf of the U.S. Army, attached please find a coordination letter regarding an upcoming National Environmental Policy Act (NEPA) Environmental Impact Statement (EIS) for a Base Realignment and Closure (BRAC) action of disposal and reuse of LRA Parcel 20 at Savanna Army Depot Activity (SVADA), Illinois. The letter is to inform your agency that the Army acknowledges five additional cultural sites that might be indirectly affected by the disposal of SVADA LRA Parcel 20.

Per the attached letter, please respond to Mr. Todd Knuth, SVADA Base Environmental Coordinator, at william.t.knuth.civ@army.mil and cc'd on this email. A response is respectfully requested within 30 days of receipt.

Thank you for your time and assistance.

Sincerely,

Michelle

Ms. Michelle Cannella | Environmental Planner

Pronouns: she, her, hers

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APPENDIX P

PUBLIC SCOPING COMMENTS, CATEGORIZED

Scoping Comments for the SVADA LRA Parcel 20 EIS

Comment Number	Commenter's Information	Topic 1	Comment
001a	Name: Lauren Cooper Organization: ACHP Affiliation: Federal Government Opinion: Neutral	Cultural/Historic	Thank you for your letter, received on August 12, 2024, regarding the disposal and reuse of Local Redevelopment Authority Parcel 20 at the Savannah Army Depot Activity. As noted in your letter, ACHP commented on the project in correspondence dated December 21, 2023, and we have no additional comments at this time. Also, we don't have input regarding a separate agency scoping meeting. We appreciate the continued communication for this project, and please reach out if you have any questions.
002a	Name: Christopher Koeppel Organization: ACHP Affiliation: Federal Government Opinion: Neutral	Cultural/Historic	On November 30, 2023, the Advisory Council on Historic Preservation (ACHP) received your notification regarding the disposal of Local Redevelopment Authority (LRA) Parcel 20 at the Savanna Army Depot Activity to the Jo-Carroll Depot LRA through a no-cost economic development conveyance. In accordance with Stipulation IV.D of the 2000 Programmatic Agreement Among United States Army, Illinois State Historic Preservation Officer, and Advisory Council on Historic Preservation for the Closure and Disposal of Savanna Army Depot Activity, Illinois, the Department of the Army will be incorporating a preservation covenant in the transfer instrument as there are two identified archaeological sites within the parcel. The ACHP notes that the Illinois State Historic Preservation Office as requested that if any modifications are made to the Jo-Carroll LRA master plan that its office is notified, and the ACHP recommends that this request be included in the preservation covenant. The ACHP does not have any additional comments on this action. Should you have any questions or require additional assistance, please contact me at (202) 517-0222 or by e-mail at ckoeppel@achp.gov and reference the ACHP Project Number above.
003a	Name: Travis Black Organization: USDOT, MARAD Affiliation: Federal Government Opinion: Support	Coordination/Communication	Sorry for the delay in responding to your "early coordination for a supplemental environmental impact statement for the implementation of base realignment and closure disposal and reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois " letter dated August 8, 2024. I just visited my office this morning and found the letter. Should a meeting, agency or public, be scheduled I would like to be advised. I would encourage email notifications and virtual meeting options if possible. Thank you, I have no comments beyond those submitted Dec20, 2023 at this time.
004a	Organization: USDOT, MARAD Affiliation: Federal Government Opinion: Support	General Support	Thank you for the opportunity to provide input to your Environmental Assessment as you explore a request of transfer of surplus properties to the disposal and reuse of LRA Parcel 20, Savanna Army Depot Activity (SVADA) in Illinois (132-acre site) for use as an industrial park. While I don't have any concerns I did want to encourage your action. The USACE proposal is very consistent with the Maritime Administrations Port Conveyance authority. Through our authority, agencies and departments of the Federal government may find that they own property that they no longer require due to programmatic changes, relocation of resources, or other operational changes. The Federal Property and Administrative Services Act of 1949, as amended, provides for the disposal of excess real property to other executive agencies that could benefit from that property. The Port Conveyance Program is designed to transfer the use and management of excess Federal property to States and local governments for the purposes of port development, port expansion, and operation of port facilities. Since the program's inception, the Maritime Administration has conveyed nearly three thousand acres of property to State and local governments in support of port facilities. The Port Conveyance Program requires the Maritime Administration to receive, evaluate, and approve applications from prospective grantees to make recommendation for assignments of surplus property to be used for the development or operation of a port facility. MARAD, in conjunction with the Department of Commerce, reviews and approves economic development plans submitted by eligible applicants to determine if the plan is viable as part of a necessary economic development program. Conveyance involves no monetary consideration, provided the property is used and maintained in perpetuity as a port facility. Excess military installations are usually disposed of as a part of the Defense Base Closure and Realignment Act of 1990
004b	Name: Travis Black Organization: USDOT, MARAD Affiliation: Federal Government Opinion: Support	Socioeconomics	Our administration believes that well-planned port conveyance development projects improve port facility productivity and promote seamless intermodal transfer, which in turn benefits port communities by improving access to land, reducing highway and rail congestion, and minimizing air pollution. Port improvements also create jobs and stimulate the economy in localities. We have been working with and encouraging the Jo-Carroll Depot local redevelopment authority (LRA) in their desire to create a port and industrial park. These plans have been developed with extensive public input and outreach. We feel that your actions to dispose of the 132 -acre parcel for their re-use plan is a win for the community and for the potential enhancement of the supply chain by moving goods on the waterway (the most environmentally friendly, safest and with the fewest disruptive impacts mode of transportation). This action will be similar to a previous base closing at America's Central Port in Granite City, IL.
004c	Name: Travis Black Organization: USDOT, MARAD Affiliation: Federal Government Opinion: Support	General Support	Please let me know if you have any questions or need clarification about our port conveyance program. This proposal doesn't raise any issues and we encourage you to move forward.
005a	Name: Jodi Creswell Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Coordination/Communication	We received your letter dated August 8, 2024, initiating early coordination for the preparation of a Supplemental Environmental Impact Statement (SEIS) to evaluate the potential effects of the Army disposing a 132-acre parcel of the Savanna Army Depot Activity (SVADA) and the local redevelopment authority's (LRA's) action of reusing of the parcel. You recently coordinated this project as an environmental assessment (EA) with the US Army Corps of Engineers, Rock Island District (District) in November 2023 and the District provided information to you in a letter dated January 16, 2024. Based on information provided during the EA scoping process, the Army determined that preparations of a SEIS would be appropriate. The Army is requesting the District's input on holding an agency meeting separate from the public scoping meeting and any to provide any comments in addition to those provided in our previous letter. District staff feels it would be valuable and would like to be involved in an agency meeting separate from the public scoping meeting.
005b	Name: Jodi Creswell Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Cultural/Historic	District staff also had one comment in addition to what was provided in the January 16, 2024, letter: The additional navigation traffic in the slough may cause additional erosion. The potential for that erosion and the associated impacts to resources in the public trust on federal lands such as archeological resources should be addressed.
005c	Name: Jodi Creswell Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Coordination/Communication	Thank you for continuing to keep the District involved as the project progresses and we look forward to future meetings. If you need more information, please contact Ms. Kelsey Hoffmann of our Environmental Compliance Branch, at (309)-794-5319 or Kelsey.A.Hoffmann@usace.army.mil.
006a	Name: Jodi Creswell Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Other	I received your letter dated December 14, 2023, concerning the preparation of an Environmental Assessment (EA) to evaluate the potential effects of the Army disposing a 132-acre parcel of the Savanna Army Depot Activity (SVADA) and the local redevelopment authority's (LRA's) action of reusing of the parcel. The US Army Corps of Engineers, Rock Island District (District) staff reviewed the information you provided and have the following comments:
006b	Name: Jodi Creswell Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Land Use	In your proposal, "Parcel 20", Tract 501 (also known as Apple River Island) is District administered land. The District real estate office would require a Real Estate Application to detail all known work or future work concerning Tract 501 prior to considering issuing an outgrant, therefore, further coordination with District real estate office is required. If you have any questions regarding requirements for real estate, please contact Ms. Caitlin Wheeler, Real Estate Specialist at the Rock Island District. You may reach Ms. Wheeler by email at Caitlin.S.Wheeler@usace.army.mil or by telephoning 309-794-5274
006c	Name: Jodi Creswell Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Water	Any proposed placement of dredged or fill material into waters of the United States (including jurisdictional wetlands) requires Department of the Army authorization under Section 404 of the Clean Water Act. Based on the information you provided, a Section 404 permit may be required for this project. A completed application packet should be submitted to the Rock Island District for processing as soon as possible. The application should include final plans, wetland delineations using the Corps 1987 Wetland Delineation Manual and Midwest Regional Supplement, details of proposed impacts to wetlands and other waters of the United States, a statement explaining how impacts associated with the proposed activity are to be avoided, a description of planned components intended to minimize impacts to wetlands and streams, and a complete wetland/stream mitigation plan. The requirements for a complete mitigation plan are described in the Federal Register (Volume 73, No. 70) dated April 10, 2008, under "Compensatory Mitigation for Losses of Aquatic Resources; Final Rule".

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006d	Name: Jodi Creswell Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Navigation	Your proposal may also include impacts to navigation under Section 10 of the River and Harbors Act and would require a permit. Please see Enclosure 1 for addition permitting requirements and information.
006e	Name: Jodi Creswell Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Navigation	Your proposal includes modifications to the Mississippi River Navigation Channel, a Federal project, therefore, a section 408 permit will be required.
006f	Name: Jodi Creswell Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Water	If you have any questions regarding permitting requirements under Section 404 of the Clean Water Act, Section 10 of the River and Harbors Act, or Section 408, please contact Ms. Aurora Scott, Regulatory Biologist at the Rock Island District. You may reach Ms. Scott by email at Aurora.C.Scott@usace.army.mil or by telephoning 309-794-5057.
006g	Name: Jodi Creswell Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Water	The District Hydrology and Hydraulics (H&H) Branch reviewed the proposed project and provided some analysis (Enclosure 2). If you have any questions regarding H&H, please contact Mr. Kevin Landwehr, Hydrology and Hydraulics Branch Chief at the Rock Island District. You may reach Mr. Landwehr at Kevin.J.Landwehr@usace.army.mil or by telephoning 309-794-5310.
006h	Name: Jodi Creswell Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Navigation	This Mississippi River Project Office Operations Division reviewed the proposed project and provided supplement comments and information (Enclosure 3). If you have any questions regarding Operations Division comments, please contact Mr. Joe Lundh, Natural Resources Specialist at the Rock Island District. You may reach Mr. Lundh at Joseph.S.Lundh@usace.army.mil or by telephoning 309-794-4528.
006i	Name: Jodi Creswell Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Cultural/Historic	The Responsible Federal Agency should coordinate with the Illinois State Historic Preservation Office (SHPO) to determine impacts to historic properties. Contact information can be found at: https://dnrhistoric.illinois.gov/preserve/contact-staff.html or by phone at 217-782-4836.
006j	Name: Jodi Creswell Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Biological	The Rock Island Field Office of the U.S. Fish and Wildlife Service should be contacted to determine if any Federally listed endangered species are being impacted and, if so, how to avoid or minimize impacts. The Illinois & Iowa Ecological Services Field Office address is: 1511 47th Avenue, Moline, IL 61265. Mr. Kraig McPeck is the Field Office Supervisor. You can reach him by calling 309-757-5800.
006k	Name: Jodi Creswell Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Water	The Illinois Emergency Management Agency should be contacted to determine if the proposed project may impact areas designated as floodway. Sam M. Al-Basha is the Illinois State Hazard Mitigation Officer. The address is: 1035 Outer Park Drive, Springfield, IL, 62704. You can reach him by calling 217-785-9942.
006l	Name: Jodi Creswell Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	NEPA	The District plans to adopt the EA to satisfy NEPA requirements for the civil works portion of the proposed action. The US Army NEPA document should address our concerns outlined in this letter.
006m	Name: Jodi Creswell Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Other	No other concerns surfaced during our review. As your planning progresses, the District may have additional comments. Thank you for the opportunity to comment on your proposal. If you need more information, please call Ms. Kelsey Hoffmann of our Environmental Compliance Branch, at Kelsey.A.Hoffmann@usace.army.mil or at (309)-794-5319. You may find additional information about the Corps' Rock Island District on our website at http://www.mvr.usace.army.mil . To find out about other Districts within the Corps, you may visit: http://www.usace.army.mil/Locations.aspx .
006n	Name: Jarin Rudsell Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Navigation	1. Memo Description Section 9.6 of the reuse plan identifies next steps which include coordination with regulatory partners. This memo is intended to provide guidance for the applicant on potential information required to properly evaluate the permit for navigation impacts under Section 10 of the Rivers and Harbors Act. The guidance identified in this memo is not all inclusive of what may be required for permitting review for Section 10 compliance but is intended to provide initial considerations for the applicant to address in the forthcoming permit documents. Additional considerations may arise as the project moves from plan formulation to the design phase and additional details become available.
006o	Name: Jarin Rudsell Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Proposed Action/Alternatives	2. Relevant Background Information and Discussion The Savanna Army Depot Activity site is a 13,062-acre former Army installation located on the eastern bank of the Mississippi River in Carroll and Jo Daviess counties, seven miles north of the city of Savanna, Illinois. The Jo Carroll Depot Local Redevelopment Authority (LRA) has been recognized by the Department of Defense (DoD) as the Local Redevelopment Authority for this surplus property. The LRA has developed a multifunctional reuse plan for the site that includes a port facility, fleeting areas, aquatic restoration area, and recreational uses.

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006p	Name: Jarin Rudsell Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Navigation	3. Operations Division, Channel Maintenance Considerations a. Existing River Training Structures including closing structures and wingdams are located in the project vicinity. The Reuse Plan is not clear if there are proposed alterations to the structures or the effective area of the structures. A detailed plan of any alterations or activities that impact the effectiveness of the structures will be required. Specific analysis information required will depend on the proposed modifications in or around those structures and requirements from Engineering Division, Hydraulics. b. Fleet areas on the channel side of Apple Island as identified in Figure 1 (Figure 8-4 of the Reuse Plan) will need to be evaluated to determine the impacts to navigation, existing revetment, and the unprotected bankline. Details should include fleet apertures, analysis of prop wash on the existing riprap revetment and bankline, and proposed traffic patterns for the fleet areas to allow evaluation of impacts of the proposed fleet area to the navigation channel. c. As plans progress, layout and traffic patterns for the entrance and exit of the proposed port need to be evaluated for impacts to the existing river training structures, impacts to sediment transport, and navigational hazards. It is currently unclear if the proposed plan is to utilize areas upstream or downstream of Apple Island or a combination of the two for the entrance/exit. The analysis should include hydrographic survey of existing conditions, proposed final conditions, plans for identification and preservation of river training structures, and a barge turning analysis for entering and exiting the port from the main channel.
006q	Name: Jarin Rudsell Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Navigation	4. Other Office Coordination a. The hydraulic analysis review identified in this memo will be completed by the MVR Hydrology and Hydraulics Branch. Their review comments will be submitted in a separate document and will identify specific requirements for hydraulic analysis review that will inform the channel maintenance decision.
006r	Name: Kevin Landwehr Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Proposed Action/Alternatives	1. Pertinent information related to action being reviewed. a. Project Description: The Savanna Army Depot Activity site is a 13,062-acre former Army installation located on the eastern bank of the Mississippi River in Carroll and Jo Daviess counties, seven miles north of the city of Savanna, Illinois. The Jo Carroll Depot Local Redevelopment Authority (LRA) has been recognized by the Department of Defense (DoD) as the Local Redevelopment Authority for this surplus property. The LRA has developed a multifunctional reuse plan for the site that includes a port facility, fleet areas, aquatic restoration area, and recreational uses (Figure 1). This review is based upon the information provided in the "Jo Carroll Depot Local Redevelopment Authority, Final Reuse Plan for Parcel 20, Former Savanna Army Depot", dated June 2023. b. The U.S. Army is requesting USACE review as they prepare an Environmental Assessment to evaluate the potential effects of the Army's primary action of disposing the Savanna Army Depot, and the local redevelopment authority's secondary action of reuse of the parcel.
006s	Name: Kevin Landwehr Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Navigation	c. The proposed facility is to be located on a side channel to the UMR within Pool 13. Proposed fleet areas have been identified on both the navigation channel and side channel banks of Apple River Island. Numerous wingdams and a closing dam are in the immediate vicinity of the proposed port facility and fleet areas (Figure 2).
006t	Name: Kevin Landwehr Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Navigation	d. To provide access to the proposed facilities, extensive access channel dredging (~400,00 yd3; orange area in Figure 3) is proposed with additional dredging (~840,000 yd3; yellow and green areas in Figure 3) on Parcel 20 to accommodate the lift-on/lift-off port area and other project features (Figure 3). The identified dredging areas do not appear to cover all of the proposed fleet areas shown in Figure 1, and do not specifically address the location or size of the dredged connection to the main channel of the UMR.
006u	Name: Kevin Landwehr Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Navigation	e. Historical records indicate frequent dredging upstream of the project reach, below the mouth of the Maquoketa River. Immediately adjacent to Apple River Island, there have been a few historical dredging events, but none in the last several decades.
006v	Name: Kevin Landwehr Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Navigation	2. Comments from Hydrology & Hydraulics Branch: a. In addition to Section 10 review of the future project, alteration of the closing dam, or any windams, should be reviewed under Section 408 to ensure the existing USACE project (UMR 9-foot channel project) is not impacted.
006w	Name: Kevin Landwehr Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Navigation	b. Review of available bathymetry (Figure 4) indicates that there is insufficient depth in the access channels to allow for navigation to the proposed port facility and some of the fleet locations. The likely access dredging paths (both upstream and downstream) and the proposed fleet locations intersect with existing wingdams, a closing dam, and would necessitate removal of a portion of one or more islands in the UMR National Wildlife and Fish Refuge. The provided report estimates total dredging quantities at approximately 1.2 million cubic yards but does appear to capture the full area under consideration.
006x	Name: Kevin Landwehr Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Navigation	c. The provided report provides only a general description of the proposed improvements. Prior to any USACE permitting or approvals (Section 10, 408, etc.), site specific details and drawings will be required that provide: 1. Mapping and cross-sections depicting the location, elevations, and quantities of proposed dredging, including locations of proposed placement of the dredged materials. 2. Drawings showing any proposed modifications to the existing wingdams and closing dam.
006y	Name: Kevin Landwehr Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Navigation	d. The extensive dredging of the side channel, expansion of the side channel downstream connection to the main channel, and the potential modification of the channel training structures in the reach have the potential to impact the conveyance of water and sediment in the main navigation channel. This has the potential to impact reliability of maintaining the navigation channel and the long-term channel maintenance requirements (e.g., dredging) for USACE. Therefore, multi-dimensional hydraulic modeling will be required prior to permission being given for the project to proceed. The scope and extent of modeling should be developed in consultation with USACE once the information identified in the paragraph above is available. Depending upon the results of the hydraulic modeling, sediment transport modeling may also be required. Per EC 1165-2-220, proposed alterations to USACE civil works projects must not impair the usefulness of the USACE project nor be injurious to the public interest.
006z	Name: Kevin Landwehr Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Water	e. Lands (including refuge lands) adjacent to the identified fleet areas and access channels will be subjected to potential erosion from fleet and transiting vessels. Future submittals should address this potential as well as any proposed bank protection/stabilization required.
006aa	Name: Kevin Landwehr Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Navigation	3. Due to the potential impacts to existing USACE property and maintenance of the navigation channel, additional information and consultation will be needed with USACE prior to formal review under Section 10 or Section 408.
006bb	Name: Joseph Lundh Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Navigation	1. These Mississippi River Project comments on the subject plan are intended to supplement the Corps comments but may overlap with other support and technical offices in the District. 2. The proposed plan appears to affect the operation and maintenance of the Project and specifically the navigation channel and potentially affect or is coincident with Corps fee title Real Estate interest. All applicable Corps regulations for development requests affecting a civil works project should be followed. We encourage the Port Authority and Local Redevelopment Authority to work closely with the Project and the Corps to address information needs and pursue all applicable permissions.
006cc	Name: Joseph Lundh Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Navigation	3. The Final Reuse Plan for Parcel 20 involves riverbed, navigation structures, and other fee title lands outside of this tract. 4. The plan proposes barge mooring structures on riverbed in Illinois adjacent to Apple River Island. Riverbed is not sovereign lands to the State, but rather able to be owned by private and public entities. Placement of structures in Illinois riverbed should involve permissions from the landowner. Typically, that the owner of the shoreline or islands in Illinois also owns the adjacent riverbed. Apple River Island federal fee Real Estate interest was transferred to the U.S. Army Corps of Engineers. The Project will defer to the Real Estate Office in Rock Island District for further comment on input on federal ownership.

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006dd	Name: Joseph Lundh Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Water	5. Regardless of establishing whether the riverbed around Apple River Island has fee title interest by the Corps, placement of structures and barge floating area surrounding the island may affect the shoreline and shoreline erosion. The plans did not include any study of the impacts or mitigation measures if increase in shoreline erosion is anticipated.
006ee	Name: Joseph Lundh Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Navigation	6. If this request does affect federal Real Estate fee title interest of the Corps, then the Non-Recreation Outgrant Policy, Chapter 17 of Engineering Regulation (ER) 1130-2-550 and other applicable policy should be followed.
006ff	Name: Joseph Lundh Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Navigation	7. The Operations Division Technical Branch (OD-T) and navigation industry should have the chance to comment on the floating areas adjacent the navigation channel. It appears that barge traffic may be within a few hundred feet from current Apple River Island shoreline. Potential impacts to the navigation channel and navigation industry operations should be considered and studied.
006gg	Name: Joseph Lundh Organization: USACE, Rock Island District Affiliation: Federal Government Opinion: Neutral	Navigation	8. The access requirements for barge floating and access to the port may affect navigation structures and the operation of the Project. District Engineering and OD-T staff should have the opportunity to request and review flow studies. The Project will defer to their expertise, but in the absence of additional comment, here are some Project comments: Placement of barge floating areas above and below a closing structure appears to require changes to the closing dam for commercial navigation access over the structure. There is no mention any changes to the side channel closing structure in the plans. Changing side channel structures and dredging into a side channel with closing structures may have an impact to the navigation channel. If flow increases in this side channel, a resulting reduction in flow in the main channel may increase dredging requirements for the channel. This should be studied and considered. Wing dams in the vicinity of Apple Island was listed as a voiced concern during public and TAC input but was not addressed in the plan.
007a	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Proposed Action/Alternatives	<p>The U.S. Environmental Protection Agency (EPA) has reviewed the Department of the Army's (DoA) August 8, 2024, early coordination request for reuse of a 132-acre parcel of the Savanna Army Depot Activity (SVAD) and expected subsequent reuse of this acreage. This letter provides EPA's comments on the early coordination request and Jo Carroll Depot Local Redevelopment Authority Final Reuse Plan for Parcel 20, Former Savanna Army Depot, dated June 2023 (hereinafter the Parcel 20 Reuse Plan), pursuant to our authorities under the National Environmental Policy Act (NEPA), the Council on Environmental Quality's (CEQ) NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.</p> <p>The SVAD site is a 13,062-acre former DoA installation located on the eastern bank of the Mississippi River, 9 miles north of Savanna, Illinois. Between 1917 and 1995, the DoA used the property for artillery weapons and ammunition testing, storage of ordnance, and the loading and renovating of shells and bombs. The 1995 Base Realignment and Closure (BRAC) Commission recommended closure of SVAD. A 1997 environmental impact statement (EIS) evaluated the closure, and the SVAD was officially closed in 2000. The forthcoming Supplemental Draft EIS (SDEIS) will supplement the 1997 EIS. The DoA has been conducting environmental remediation to clean-up surplus property in preparation for eventual property transfer.</p> <p>On January 17, 2016, the DoA published notice in the Federal Register indicating surplus property was available at SVAD for public benefit purposes and that the Jo Carroll Depot Local Redevelopment Authority (LRA) had been recognized by the Department of Defense as the Local Redevelopment Authority for this surplus property. The LRA performed an analysis (the Parcel 20 Reuse Plan) in support of reuse planning for LRA Parcel 20, which covers 132 acres, for DoA's use when preparing the NEPA scoping document.</p> <p>The 132-acre parcel is undeveloped land sharing a border with the Upper Mississippi River National Wildlife and Fish Refuge, the Apple River, and a tributary of the Mississippi River. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast. The railway right-of-way and a sewage treatment plant surrounded by the 132-acre parcel and owned by the DoA are not part of the parcel to be transferred.</p> <p>The LRA's finalized 2023 reuse plan presents three conceptual reuse alternatives for developing LRA Parcel 20, which focus on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development, under each alternative. Three conceptual alternatives for redevelopment of LRA Parcel 20 were identified in the scoping document as follows:</p> <p>Alternative 1 (Brickhouse Slough) – This alternative prioritizes fleet1 development of a dry bulk and liquid bulk wharf on the Brickhouse Slough and recreational use. Key port infrastructure includes a barge floating area, an 800-foot dry and liquid bulk wharf, a floating dry dock, a wharf access road, a haul road, a liquid bulk pipeline, and a conveyor system.</p> <p>Alternative 2 (Commander's Pond Life) – This alternative expands on Alternative 1 and adds a 600-foot lift-on/lift-off wharf to allow the handling of two 250-foot barges simultaneously to support expansion of specialty and breakbulk cargoes and dry dock capacity. This concept would require approximately 18 acres of dredging within the Commander's Pond area to support access to Brickhouse Slough.</p> <p>Alternative 3 (Commander's Pond Full) – This alternative expands on Alternative 2 and adds additional port support to include an additional 350-foot lift-on/lift-off wharf to allow the handling of two 250-foot barges simultaneously, a repair floating area, and the inclusion of an aquatic habitat restoration area. This concept would require approximately 42 acres of dredging within the Commander's Pond area with 26 acres to support cargo activities and the remaining 16 acres dedicated for aquatic habitat restoration. Alternative 3 is the LRA's preferred alternative as of November 27, 2023.</p> <p>To facilitate implementation, the LRA designed the alternatives as sequential phases. Alternative 1 could be implemented within a target 5-year completion window, while Alternatives 2 and 3 could follow, with both having 5-year-plus completion windows. The LRA's proposed reuse plan includes activities outside the boundary of LRA Parcel 20.2 Each of the LRA's reuse alternatives would require dredging.</p> <p>Scoping information previously provided3 indicates the timing for capital expenditures is not fully established and will depend in large part on market interest and development participation by private partners as well as regulatory and permitting issues. To facilitate implementation, the alternatives are designed to phase into each other seamlessly and sequentially. For example, Alternative 1 could be initiated immediately with a target five-year completion window, while Alternatives 2 and 3 could follow in a five-year plus completion window.</p>
007b	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	NEPA	According to the scoping information, the development of these parcels by the LRA could not occur if the land was not transferred to it by the DoA. NEPA regulations indicate connected actions are those actions that could not or would not occur but for another action (e.g., the proposed land transfer from DoA to LRA). Connected actions must be analyzed in the same NEPA document, because the environmental impacts generated from the non-DoA action would not occur but for the DoA action of transferring Parcel 20.
007c	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Coordination/Communication	EPA provided detailed NEPA scoping comments dated February 2, 2024 (see enclosed letter). Based on the November 27, 2023, scoping information, we understood a Draft Environmental Assessment would be developed. Our comments in this letter recommend the forthcoming SDEIS address our recommendations regarding Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) sites, impacts to wetlands and aquatic resources, project design and staging, environmental justice and children's health, climate change, energy efficiency and environmental best practices, natural features, non-native invasive species, cumulative impacts, permitting, and inter-agency coordination.
007d	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Other	Thank you for the opportunity to review and provide comments on this project. Please contact the lead NEPA Reviewer, Kathy Kowal, via email at kowal.kathleen@epa.gov if you have any questions regarding the contents of this letter as well as to arrange inter-agency meetings concerning this project.

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007e	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Hazardous Materials/Waste	<p><u>1. COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT (CERCLA) SITES</u></p> <p>A. LRA Parcel 20 includes CERCLA sites which were previously investigated [e.g., Site 20 (Abandoned Landfill), Site 73 (Stables Landfill), Site 77 (1917-Era Powder Magazines), Site 130 (Vincent Road Septic System), Shop Area (Buildings 100 through 129 Sanitary and Stormwater Sewer lines and Outfalls to Site 178 and Site 178 (Ordnance School Lake, also known as Commander's Pond)]. Based on information available to EPA, the current status of the CERCLA sites is as follows:</p> <p>Site 20 (Abandoned Landfill):</p> <p>According to the Final Record of Decision, Site 20 – Abandoned Landfill and Site 99 – Building 762, CF Plant Battery Shop and Leaching Pits, Savanna Army Depot Activity, Savanna, Illinois, dated June 2016 (Site 20 Record of Decision (ROD)), the selected remedy included landfill capping with hotspot removal, long-term groundwater monitoring, and land use controls (LUCs). Based on the Final Land Use Control Implementation Plan, Site 20 Abandoned Landfill, Savanna Army Depot Activity, Savanna, Illinois, dated October 2019 (Site 20 LUCIP), the institutional and engineering controls for Site 20 include:</p> <ul style="list-style-type: none"> -environmental covenants to prohibit residential use, access to groundwater, and intrusive activities (including agricultural use) at the site; -Illinois Environmental Protection Agency (Illinois EPA), DoA, and EPA review of LUC inspections and approval processes; -maintenance of a vegetated engineered landfill cap constructed with at least 2 feet of compacted clay and 6 inches of topsoil and turf reinforcement mat including the intended vegetative cover and the underlying -soil such that erosion gullies and localized settlement do not occur; -use of site boundaries to limit site access: wetlands and the Apple River form the northeastern, eastern, and southern boundaries and a railroad right-of-way and fencing along the western boundary of the site; and, -signs and engineered cap delineation posts are installed along the boundary of the site. <p>Based on the Final Second Five-Year Review Report for Savanna Army Depot Activity Superfund Site, Savanna, Jo Daviess and Carroll Counties, Illinois, dated June 2020 (2nd FYR), the excavation, offsite disposal of soil, and installation of a vegetated engineered landfill cap have been completed. However, the UECA [Uniform Environmental Covenants Act] environmental covenants have not been executed. Groundwater monitoring is still ongoing.</p> <p>Site 73 (Stables Landfill):</p> <p>According to the Final Record of Decision, Site 73 – Stable Landfill and Site 178 – Ordnance School Lake, Savanna Army Depot Activity, Savanna, Illinois, dated August 2016 (Sites 73 & 178 ROD), the selected remedy for Site 73 includes "[R]emoval and disposal of bulk debris and drums as nonhazardous waste following appropriate characterization; excavation of soil containing COCs [contaminants of concern] at concentrations above the remediation goals for residential use; transportation of the excavated debris and soil to a RCRA [Resource Conservation and Recovery Act] Subtitle D permitted facility (assuming the soil is nonhazardous); and, restoration of the site, which may include restoration of disturbed wetlands."</p> <p>Based on the 2nd FYR, "Remedial action was completed in December 2018 and the completion report is in the final stages. Site meets requirements for unrestricted use."</p> <p>Site 178 (Ordnance School Lake also known as Commander's Pond):</p> <p>According to the Sites 73 & 178 ROD, the selected remedy for Site 178 includes</p> <p>"[E]xcavation of outfall surface soil and sediment along the western shoreline containing COCs at concentrations above recreational remediation goals; transportation of excavated material to a RCRA Subtitle D permitted facility for disposal (assuming the material is nonhazardous); site restoration, including regrading and/or bank stabilization; implementation of administrative LUCs (e.g., zoning laws) to maintain recreational or industrial/commercial use of the property; development of a Land Use Control Implementation Plan (LUCIP) to document strategies for implementing, maintaining, monitoring, and enforcing LUCs at the site; and, periodic monitoring of the LUCs conducted annually and as part of CERCLA 5-year reviews; in the event that the site changes land use designation, the 5-year review will be used as a mechanism to determine if the site conditions require a modification or amendment to the site controls."</p> <p>Based on the 2nd FYR, "[E]xcavation and offsite disposal was conducted in December 2018. LUC Implementation Plan (LUCIP) is under review. LUCs need to be implemented."</p> <p>Site 77 (1917-Era Powder Magazines) and Site 130 (Vincent Road Septic System):</p> <p>Sites 77 and 130 were initially evaluated and determined not to require further investigation or remediation.</p>
007f	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Hazardous Materials/Waste	<p><u>Recommendations for the SDEIS:</u></p> <p>1. Given the current status of the CERCLA sites above, EPA has identified the following issues with regard to information contained in the scoping request and the Parcel 20 Reuse Plan:</p> <p>a) The Scoping Request and the Parcel 20 Reuse Plan did not discuss how LUCs will be implemented and maintained under the conceptual redevelopment alternatives. As such, it is unclear if any of the three proposed reuse alternatives presented in the Parcel 20 Reuse Plan would impact the implementation of required LUCs that are established in the respective RODs for Sites 20 and 178. For example, the Parcel 20 Reuse Plan states, "The existing landfill area has potential space for a public gathering area and may include parking, recreational fields, a dog park, and gathering spaces such as picnic tables or gazebos;" however, there is no mention of the Site 20 LUCIP LUCs to "Protect human receptors from contact with the soil COCs and the landfill waste. Maintain the site in accordance with the Operation and Maintenance Plan and as required by 35 Illinois Administrative Code [IAC] 811.811" or "Prohibit unauthorized intrusive activity into or extraction of the landfill cap" in the scoping request or Parcel 20 Reuse Plan. Further, the Site 178 (Ordnance School Lake) land use control implementation plan (LUCIP) is still under development and has yet to be reviewed and approved by regulators.</p>
007g	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Hazardous Materials/Waste	<p>b) Section 3.4 [Ordnance and Explosives (OE) and Munitions Debris (MD)] of the Parcel 20 Reuse plan indicates that Sites 20 and 73, "were confirmed disposal areas for munitions constituents based on historical contamination detected in the landfills, and uncontrolled dumping of munitions and munitions constituents may have occurred throughout Parcel 20." However, the scoping request and Parcel 20 Reuse Plan do not discuss how potential exposure to munitions and munitions constituents will be mitigated. This is of particular concern given the proposed recreation areas and proposed recreational trails included in the conceptual redevelopment alternatives.</p>
007h	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Hazardous Materials/Waste	<p>c) The scoping request states, "Since publishing its reuse plan, the LRA also has indicated its interest in an interim use lease agreements and/or an early transfer agreement that would allow construction of a solar energy facility atop the capped landfill within LRA Parcel 20;" however, no further details were provided. For example, it is unclear how the construction of a solar energy facility atop the capped landfill at Site 20 will meet the Site 20 LUCIP LUCs to "Protect human receptors from contact with the soils COCs and the landfill waste. Maintain the site in accordance with the Operation and Maintenance Plan and as required by 35 Illinois Administrative Code [IAC] 811.811" or "Prohibit unauthorized intrusive activity into or excavation of the landfill cap."</p>
007i	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Hazardous Materials/Waste	<p>d) Based on Sections 8.2 (Alternative 2: Commander's Pond Lite) and 8.3 (Alternative 3: Commander's Pond Full) of the Parcel 20 Reuse Plan, the conceptual redevelopment alternatives would require approximately 18 to 42 acres to be dredged including areas previously remediated. However, the cost and dredging estimated in Sections 9.2 (Cost Estimates) and 9.3 (Dredging Estimate) of the Parcel 20 Reuse Plan do not include details or costs associated with the management characterization or disposal of these dredged sediments. Constituents of concern at Site 178 previously included polynuclear aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), pesticides, and heavy metals. As such, it is unclear if the level of effort needed to dredge Site 178 has been sufficiently estimated.</p>
007j	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Hazardous Materials/Waste	<p>e) To date, the five CERCLA sites associated with LRA Parcel 20 have not been investigated for per- and polyfluoroalkyl substances (PFAS) contamination. As such, it is unclear if the conceptual redevelopment alternatives and associated costing are sufficiently representative should a PFAS remedial action be warranted.</p>
007k	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Hazardous Materials/Waste	<p>2. Assuming the Parcel 20 Reuse Plan will be an appendix to a future SDEIS, ensure that revisions to the Parcel 20 Reuse Plan include detailed information regarding the implementation of LUCs under the conceptual redevelopment alternatives, following regulatory approval of the LUCIP for Site 178.</p>

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007l	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Hazardous Materials/Waste	3.Ensure the Parcel 20 Reuse Plan clarifies how potential exposure to munitions and munitions constituents will be mitigated.
007m	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Hazardous Materials/Waste	4. Revise the Parcel 20 Reuse Plan to include information about all conceptual redevelopment alternatives and demonstrate that any solar facility components installed on the landfill cover will not adversely affect the final cover system.
007n	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Hazardous Materials/Waste	5. Revise the Parcel 20 Reuse Plan to discuss the management, characterization, and disposal of all sediments to be dredged, and include a discussion on the sediments' impact on costs and schedule. This plan should also include additional characterization of the non-remediated portions of Commander's Pond.
007o	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Hazardous Materials/Waste	6. Ensure the Parcel 20 Reuse Plan discusses how potential exposure to PFAS will be characterized and potentially mitigated given the lack of PFAS characterization of the sites.
007p	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Water	<u>2. WETLANDS/STREAMS/AQUATIC RESOURCES</u> A. The scoping information indicates that Parcel 20 1) provides accessibility to water, roads, and rail, demonstrating access for port-related development, and 2) drains into creeks and sloughs of the Apple and Mississippi Rivers, replenishes groundwater supplies via low areas on the site, and contains bottomland forest. Due to its landscape location, it is likely that Parcel 20 contains wetlands and streams. Placing fill into wetlands or streams and/or relocation of or encapsulation of streams may trigger Clean Water Act (CWA) Section 404 permitting and the need for CWA Section 401 water quality certification from the Illinois EPA (IEPA).
007q	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Water	<u>Recommendations for the SDEIS:</u> 1. Before the SDEIS is released for public review and comment, a formal wetland and Waters of the U.S. delineation should be completed to know definitively where wetlands, streams, and other regulated Waters of the U.S. are located. EPA strongly recommends that this delineation be completed before and included in (as an appendix to) the SDEIS. The SDEIS should provide accurate information on impacts to regulated water resources, and information on how those impacts will be mitigated.
007r	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Water	2. Identify acreage for both direct (e.g., permanent fill), indirect (e.g., changes in hydrology), and temporary (e.g., temporary fill) impacts to regulated water resources, including wetlands, for each action alternative. Understanding that plans have not yet been developed, using a range to identify impacts would be useful to understand potential impacts (e.g., 100-150 acres of wetland impact).
007s	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Water	3. Disclose how sequencing established by the CWA Section 404(b)(1) Guidelines, namely, avoidance first, followed by demonstration of impact minimization, and mitigation for unavoidable impacts was applied to determine aquatic impacts. The CWA Section 404(b)(1) guidelines call for the Least Environmentally Damaging Practicable Alternative (LEDPA) to be selected to address impacts to wetlands, streams, and other waters of the United States.
007t	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Water	4. Discuss potential wetland and stream mitigation requirements, if applicable.
007u	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Water	5. Discuss the current conditions of surface water resources and potential impacts from the proposed project (e.g., impacts to Clean Water Act (CWA) Section 303(d)-listed water bodies and their impaired status).
007v	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Water	6. Describe proposed measures to capture and filter stormwater runoff, preliminary drainage design, and proposed stormwater filtration.

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007w	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Water	7. Discuss whether sediments that would need to be dredged from Brickhouse Slough and Commander's Pond have been tested, and where clean dredged materials will be placed.
007x	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Water	8. Consider beneficial re-use of dredged materials.
007y	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Proposed Action/Alternatives	<u>3. PROJECT DESIGN / PROJECT STAGING</u> A. The SDEIS should include information regarding potential construction.
007z	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Utilities/Infrastructure	<u>Recommendations for the SDEIS:</u> 1. Consider impacts on existing infrastructure (e.g., drinking water intake locations, sewer/septic, utilities, stormwater and effluent discharge point sources, existing public and private piers and boat ramps) and how construction would impact or otherwise affect this infrastructure.
007aa	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Traffic/Transportation	2. Provide information on contractor staging locations, access routes and locations, and mobilization.
007bb	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Water	3. Ensure that the wetland delineation to be undertaken includes all staging locations and that all staging and access road areas are investigated for the presence of regulated water resources.
007cc	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Proposed Action/Alternatives	4. Provide maps and figures showing all staging, access, and temporary road/mobilization locations, including areas of work within waterways.
007dd	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Coordination/Communication	5. Provide information on coordination with the state resource agencies regarding required permitting, and any required mitigation for proposed work.
007ee	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Environmental Justice/Children	<u>4. ENVIRONMENTAL JUSTICE AND CHILDREN'S HEALTH</u> A Outreach and meaningful engagement are underlying pillars of environmental justice (EJ). It is imperative that DoA determine if the proposed Project will affect communities with EJ concerns. CEQ requires Lead agencies to analyze the disproportionate and adverse human health and environmental effects of a proposed action in communities with EJ concerns. If significant human health and environmental effects disproportionately and adversely affect communities with EJ concerns, CEQ regulations direct Lead agencies to consider incorporating mitigation measures that address or reduce those effects. Executive Order (EO) 14096: Revitalizing Our Nation's Commitment to Environmental Justice for All supplements EO 12898: Federal Action to Address Environmental Justice in Minority and Low-Income Populations. EO 14096 directs Federal agencies, as appropriate and consistent with applicable law, to identify, analyze, and address disproportionate and adverse human health and environmental effects (including risks) and hazards of Federal activities, including those related to climate change and cumulative effects of environmental and other burdens on communities with EJ concerns. Under CEQ's NEPA Implementing Regulations ⁸ and EO 14096, environmental justice is now evaluated based simply on disproportionate and adverse effects. The Fact Sheet ⁹ accompanying EO 14096 states, "The Executive Order [EO 14096] uses the term 'disproportionate and adverse' as a simpler, modernized version of the phrase 'disproportionately high and adverse' used in Executive Order 12898. Those phrases have the same meaning but removing the word 'high' eliminates potential misunderstanding that agencies should be only considering large disproportionate effects." Ensure references reflect "disproportionate and adverse" as outlined in CEQ regulations and EO 14096. Section 3(b)(1) of EO 14096 also directs EPA to assess whether each agency analyzes and avoids or mitigates disproportionate human health and environmental effects on communities with EJ concerns when carrying out responsibilities under Section 309 of the Clean Air Act, 42 U.S.C. 7609. EPA's recommendations below suggest opportunities to further analyze, disclose, and reduce effects to communities with EJ concerns.

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007ff	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Environmental Justice/Children	<u>Recommendations for the SDEIS:</u> 1. Identify the presence of communities with EJ concerns in the project area and within the broader area that could experience environmental impacts from the proposed project. Disclose demographic information and summarize input from community members. 2. Describe past activities and future plans to engage communities with EJ concerns during the environmental review and planning phase, and, if the project commences, during construction and operations. 3. Evaluate the impacts of this proposal on communities with EJ concerns and sensitive receptors (e.g., children, people with asthma, etc.). 4. Include an analysis and conclusion regarding whether the Project or any action alternatives may have disproportionate and adverse impacts on communities with EJ concerns, as specified in CEQ's Environmental Justice Guidance. Identify what those effects may be and include measures that will be taken to avoid, minimize, or mitigate effects. 5. Compare project impacts to an appropriate reference community to determine whether there may be disproportionate impacts. Consider risk of exposure to hazardous/toxic materials associated with the proposed construction and operation and air quality and noise impacts due to construction. 6. Consider any disproportionate non-project-related pollution exposures that communities of concern may already be experiencing, as well as any disproportionate non-pollution stressors that may make the communities susceptible to pollution, such as health conditions, other social determinants of health, and disproportionate vulnerability related to climate change. 7. EJ Screen can inform EJ and community outreach to identify potential meeting locations and any language barriers by providing information on linguistic isolation, languages spoken, and places of community cohesion (e.g., schools, places of worship), if applicable. EPA recommends DoA consider the following: f) Discuss the meaningful involvement and targeted outreach undertaken by DoA in plain language and languages other than English spoken by residents in and/or near the Project area. g) Utilize resources such as the Promising Practices for EJ Methodologies in NEPA Reviews Practices report and the Community Guide to EJ and NEPA Methods to conduct an EJ analysis that appropriately engages in meaningful, targeted community outreach, analyzes effects, and advances environmental justice principles through NEPA implementation. 8. Establish material hauling routes away from places where children live, learn, and play, to the extent feasible. Consider homes, schools, daycares, and playgrounds. In addition to air quality benefits, careful routing may protect children from vehicle-pedestrian accidents. Identify potential material hauling routes in the SDEIS.
007gg	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Air Quality/Climate	<u>5. CLIMATE CHANGE</u> A. Executive Order 14008: Tackling the Climate Crisis at Home and Abroad states, "The United States and the world face a profound climate crisis. We have a narrow moment to pursue action...to avoid the most catastrophic impacts of that crisis and to seize the opportunity that tackling climate change presents." The U.S. Global Change Research Program's National Climate Assessment provides data and scenarios that may be helpful in assessing trends in temperature, precipitation, and frequency and severity of storm events. 14 Federal courts have consistently held that NEPA requires agencies to disclose and consider climate impacts in their reviews, including impacts from greenhouse gas (GHG) emissions. On January 9, 2023, the Council on Environmental Quality (CEQ) published interim guidance to assist Federal agencies in assessing and disclosing climate change impacts during environmental reviews. 15 CEQ developed this interim guidance in response to Executive Order 13990 - Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis. This interim guidance was effective immediately. CEQ indicated that agencies should use this interim guidance to inform the NEPA review for all new proposed actions and may use it for evaluations in process, as agencies deem appropriate, such as informing the consideration of alternatives or helping address comments raised through the public comment process. EPA recommends that DoA apply the interim guidance as appropriate, to ensure robust consideration of potential climate impacts, mitigation, and adaptation issues. In addition, estimates of the social cost of greenhouse gases (SC-GHG16) are informative for assessing the impacts of GHG emissions. SC-GHG estimates allow analysts to monetize the societal value of changes in GHG emissions from actions that have small, or marginal, impacts on cumulative global emissions. Estimates of the social cost of carbon (SC-CO2) and other greenhouse gases (e.g., social cost of methane (SC-CH4)) have been used for over a decade in Federal government analyses. Quantification of anticipated GHG releases and associated SC-GHG comparisons among all alternatives (including the No Action Alternative scenario) within the SDEIS would inform project decision-making and provide clear support for implementing all practicable measures to minimize GHG emissions and releases. EPA recommends that DoA review EPA's final technical report, "Report on the Social Cost of Greenhouse Gases: Estimates Incorporating Recent Scientific Advances17," which explains the methodology underlying the most recent set of SC-GHG estimates. To better assist lead Federal agencies with the utilization of these updated estimates, EPA has also recently released a Microsoft Excel "Workbook for Applying SC-GHG Estimates v.1.0.1" spreadsheet18 which was designed by EPA's National Center for Environmental Economics to help analysts calculate the monetized net social costs of increases in GHG emissions using the estimates of the SC-GHGs.
007hh	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Air Quality/Climate	<u>Recommendations for the SDEIS:</u> 1. DoA should apply the interim guidance as appropriate, to ensure robust consideration of potential climate impacts, mitigation, and adaptation issues. Additional recommendations are as follows: a) Emissions & SC-GHG Disclosure and Analysis i. Quantify estimates of all direct and indirect GHG emissions19 from the proposed project over its anticipated lifetime for all alternatives, including the No Action Alternative, broken out by GHG type. ii. Include a detailed discussion of the project's reasonably foreseeable direct and indirect GHG emissions in the context of actions necessary to achieve Illinois' policies and GHG emission reduction goals20 as well as national policy and GHG emission reduction goals over the anticipated project lifetime, including the U.S. 2030 Paris targets and the 2050 goal for net-zero energy emissions. iii. ii. Use SC-GHG estimates to disclose and consider the climate damages from net changes in direct and indirect emissions of CO2 and other GHGs resulting from the proposed project. To do so, EPA recommends a breakdown of estimated net GHG emission changes by individual gas, rather than relying on CO2-equivalent (CO2e) estimates, and then monetize the climate impacts associated with each GHG using the corresponding social cost estimate (e.g., monetize CH4 emissions changes expected to occur with the social cost of methane (SC-CH4) estimate for emissions). 21 When applying SC-GHG estimates, just as with tools to quantify emissions, DoA should disclose the assumptions (e.g., discount rates) and uncertainties associated with such analysis and the need for updates over time to reflect evolving science and economics of climate impacts. iv. Use comparisons of GHG emissions and SC-GHG across alternatives to inform project decision-making. b. Resilience and Adaptation i. Describe changing climate conditions (e.g., temperatures and frequency and severity of storm events) and assess how such changes could impact the proposed project and the environmental impacts of the proposed project and alternatives. ii. Incorporate robust climate resilience and adaption considerations into (1) project design and engineering; (2) construction oversight; (3) commitments for protective measures related to stormwater and erosion; and (4) routine monitoring. The SDEIS should describe how DoA has addressed such considerations and provide a rationale for any reasonable alternatives to enhance resilience that were not adopted or discussed in detail. c. Reduction and Mitigation i. Identify practices to reduce and mitigate GHG emissions; include commitments by DoA and LRA to do so in the SDEIS. We recommend DoA consider practices in the enclosed Construction Emission Control Checklist. ii. Analyze best available control strategies, while considering low sensitive environmental and health receptors (e.g., schools and play areas along truck travel routes).
007ii	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Utilities/Infrastructure	<u>6. ENERGY EFFICIENCY AND ENVIRONMENTAL BEST PRACTICES</u> A. Energy efficient design and material selection could reduce operations costs and promote a high-quality work environment, while also better protecting the environment. Recycling construction debris also preserves valuable landfill space and makes use of materials that have high embodied energy. <u>Recommendations for the SDEIS:</u> 1. Achieving Leadership in Energy & Environmental Design (LEED) certification at the platinum level (or design for net-zero energy usage) for any new buildings associated with the project. Best practices for energy efficiency and sustainable building design can include the use of energy-efficient building materials, such as south-facing skylights and windows, motion sensor lighting, solar, wind, and/or geothermal power, and Energy Star certified windows and doors. In addition to reducing the overall environmental footprint, green building certification programs promote health by encouraging practices that protect indoor air quality. At a minimum, EPA encourages DoA to commit to analyze the strengths and feasibility of these strategies. 2. Constructing proposed roads, parking lots, sidewalks, or other surfaces slated for driving or walking with using permeable pavement or porous pavers to reduce runoff. 3. Identifying and implementing opportunities for additional green stormwater management practices. Opportunities include, but are not limited to, green roofs, bioswales, and rain gardens. 4. Ensuring areas around all new buildings associated with the project which are not planned for operations be considered for conversion to native habitats, increasing the area which can be beneficially used for wildlife, stormwater infiltration or detention, and aesthetics, among other functions. 5. Discussing to what extent DoA will require energy efficiency measures, greenhouse gas reductions, and other sustainability measures, per Executive Order 14057. 6. Incorporating electric vehicle charging stations in new parking areas and designating priority parking spots for carpools and low emission vehicles. 7. Committing to recycle a high percentage of construction and demolition debris. 8. Replacing raw materials with recycled materials for infrastructure components. Options include, but are not limited to: a) Using recycled materials to replace carbon-intensive Portland Cement in concrete as "supplementary cementitious material;" b) Using tire-derived aggregate in lightweight embankment fill and retaining wall backfill; and c) Using recycled materials in pavement applications, such as crushed recycled concrete, recycled asphalt pavement, and rubberized asphalt concrete. Also, in some circumstances, demolished onsite asphalt can be re-used (e.g., cold in-place recycling or full depth reclamation).
007jj	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Biological	<u>7. NATURAL FEATURES</u> A. The Refuge borders Parcel 20 on three side that includes all water access routes to the Mississippi River. It appears that proposed re-use will extend into Refuge lands. <u>Recommendations for the SDEIS:</u> 1. Discuss coordination with the U.S. Fish and Wildlife Service regarding potential impacts to the Refuge and whether proposed activities are compatible uses of Refuge lands and waters. Consider activities associated with construction (e.g., installing utilities on Refuge lands) as well as operation of proposed features. 2. Discuss potential impact to Federally-listed threatened or endangered species listed in Table ES-2. The fact that critical habitat has not been designated for these species does not equate to an analysis of potential impacts to the species themselves as a result of the proposed re-use plan. In particular, consider impacts to mussel species.

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007kk	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Biological	8. NON-NATIVE INVASIVE SPECIES (NNIS) A. Based on the proximity of the project area to the Refuge and the Mississippi River, the potential for the proposed project to spread terrestrial and aquatic NNIS is high. Care needs to be taken to reduce the spread of NNIS during project planning and implementation. Recommendations for the SDEIS: 1. Provide baseline information pertaining to current locations and acreages of terrestrial and aquatic NNIS on project lands. 2. Discuss how the project will comply with Executive Order 13112 – Safeguarding the Nation from the Impacts of Invasive Species. Include a discussion of standard best management practices (e.g., washing construction equipment) that will be used to eliminate the spread of NNIS into, as well as out of, the project area. 3. Assuming NNIS are present in the project area, discuss measures that can be taken to control or eradicate existing populations, ideally before earthmoving activities begin.
007ll	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Cumulative Effects	9. CUMULATIVE IMPACTS ANALYSIS A. Development along the Mississippi River has a lengthy history. Cumulative impacts are impacts resulting from the proposed action's incremental impacts when added to the impacts of other past, present, and reasonably-foreseeable future actions, including those under the control of other entities. Recommendations for the SDEIS: 1. Discuss potential direct, indirect, and cumulative impacts to resources in the project area that could be affected by the proposed project. 2. Consider reasonably-foreseeable impacts as a result of the proposed project (e.g., roadway improvements, induced growth, etc.). Regional or county-wide smart growth, roadway improvements, induced growth, etc.). Regional or county-wide smart growth or land use plans should inform the discussion of induced growth and cumulative impacts.
007mm	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Coordination/Communication	10. PERMITTING A. The SDEIS should include a list of all Federal, state, and local permits that will be required to undertake the preferred alternative. For all environmental impact categories requiring coordination with other Federal and state resource agencies, EPA recommends copies of both your letters to those agencies, as well as the responses from those agencies, be provided as appendices to the SDEIS.
007nn	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Coordination/Communication	11. INTERAGENCY COORDINATION A. Implementation of NEPA requires interagency coordination with multiple stakeholders, including Federal and state resource agencies, Tribes, local governments, and affected landowners. Recommendations for the SDEIS: 1. Include copies of all interagency coordination sent to, and received from Federal and state resource agencies, Tribes, and local municipalities. 2. Include a list of all Federal, state, and local permits that would be required to undertake the Preferred Alternative.
007oo	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	NEPA	12. OTHER COMMENTS A. The SDEIS should indicate how comments received during the scoping period were addressed. Recommendations for the SDEIS: 1. Create an appendix that include all comments received during the SDEIS scoping period, including any applicable transcripts of comments from the public. 2. Create an appendix that includes all correspondence sent to and received from government agencies regarding the proposed project. 3. Create a chart that lists the following: a) all comments received during the SDEIS review period; b) DoA's response with a reference to the section that was changed as a result of the comment, if applicable. Include section and page numbers for ease of reference; and c) associated mitigation efforts with responsible entity. 4. EPA recommends all technical terms be explained in plain language in the SDEIS. 5. We recommend DOA access the following databases to obtain environmental information related to the project area: a) WATERS: https://www.epa.gov/waterdata/waters-watershed-assessment-tracking-environmental-results-system b) Envirofacts: https://www3.epa.gov/enviro/facts/multisystem.html c) EJSCEEN: https://www.epa.gov/ejscreen d) NEPAAssist: https://www.epa.gov/nepa/nepassist e) CWA 303(d) Listed Impaired Waters: https://epa.illinois.gov/topics/water-quality/watershed-management/tmdls/303d-list.html f) National Ambient Air Quality Standards status: https://www3.epa.gov/airquality/greenbook/anayo_il.html
008a	Name: Nicole Goers Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Coordination/Communication	USEPA Region 5 Superfund has jurisdiction at Savanna for our environmental clean up under BRAC. As you can see below they were contacted by one of the tribal organizations and were caught off guard. I know a letter went to another section of the EPA office but can you please send out an for awareness a copy of the EA letter to: Nicole Goers, PE Remedial Project Manager, Remedial Response Section 5 Superfund & Emergency Management Division U.S. EPA, Region 5 77 W. Jackson Blvd. (SR-6J) Chicago, IL 60604
008b	Name: Nicole Goers Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Other	Thank you for providing this document so quickly.
008c	Name: Nicole Goers Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Coordination/Communication	Last Friday I received a call from someone in our Tribal and Multi-Media Programs office regarding an Environmental Assessment (EA) at Savanna Army Depot Activity. They did not have an electronic copy of the document to share with me so I don't know much more about it. Can you provide me with a copy for review? Do you know why a copy wasn't provided to me/Superfund? If there is someone else I should be reaching out to regarding obtaining a copy of this EA, please let me know.
009a	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Biological	Thank you for the opportunity to provide U.S. Fish and Wildlife Service scoping comments from the Upper Mississippi River National Wildlife and Fish Refuge (Refuge) on Army's Supplemental Environmental Impact Statement for Jo-Carroll Depot Local Redevelopment Authority's (LRA) proposed Final Reuse Plan for Parcel 20. The Refuge previously provided comments on January 3, 2024 (attached), related to the Army's Environmental Assessment for this project. All our concerns that were expressed earlier are still present. The Final Reuse Plan for Parcel 20 includes commercial development of a port terminal, habitat alteration and barge fleet within the Refuge. The LRA will need to submit documentation that addresses statutory requirements that preclude the use of these Federal lands for port and fleet facilities, as these proposed plans are in violation of numerous Federal laws, most directly but not limited to the National Wildlife Refuge Improvement Act of 1997.
009b	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Cultural/Historic	In addition to the 19 specific comments previously identified in the January 3, 2024, letter, there is an additional concern that will need to be addressed. The side channel located south of Brickhouse Slough is identified in the Final Reuse Plan as the access corridor for towboat and barge entry to Parcel 20. A portion of the east shoreline of this slough (adjacent River Mile 544) is a designated Environmentally Sensitive Area (Site 13-E-4) by the Army Corps of Engineers due to its archeological significance. I have attached a map of the area that is identified in the Army Corps of Engineers' Master Plan dated March 2022. The shoreline is a steep sand bank that is highly erosional. Wave wash from towboat and barge traffic may impact this significant archeological site.
009c	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Coordination/Communication	The Refuge is requesting an agency meeting separate from the public scoping meeting to discuss our concerns.

Scoping Comments for the SVADA LRA Parcel 20 EIS

Comment Number	Commenter's Information	Topic 1	Comment
010a	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Other	<p>Good morning Todd: Attached are U.S. Fish and Wildlife Service (USFWS) comments for Army's Environmental Assessment of Jo- Carroll Depot Local Redevelopment Authority's Final Reuse Plan for Parcel 20.</p> <p>The first attachment is my letter providing USFWS comments on the Final Reuse Plan for Parcel 20 and the Upper Mississippi River National Wildlife and Fish Refuge that lies adjacent to the parcel.</p> <p>The second attachment is USFWS comments related to Threatened and Endangered Species and other concerns provided by Craig McPeck, Field Office Supervisor, Illinois-Iowa Ecological Services Field Office.</p> <p>The third attachment is my letter to Ms. Linda Balcom dated May 22, 2017 that is referenced in the current USFWS Refuge comments for the Final Reuse Plan for Parcel 20.</p> <p>Thank you for the opportunity to provide comments on Army's Environmental Assessment for the LRA's Final Reuse Plan for Parcel 20.</p>
010b	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Biological	<p>Thank you for the opportunity to provide U.S. Fish and Wildlife Service (USFWS) comments from the Upper Mississippi River National Wildlife and Fish Refuge (Refuge) on Army's Environmental Assessment of Jo- Carroll Depot Local Redevelopment Authority's (LRA) proposed Final Reuse Plan for Parcel 20 that identifies construction of a port terminal and barge fleet. Parcel 20 contains 132 acres that is bordered by federal property. These comments identify environmental concerns related to Parcel 20 and to the USFWS Refuge that lies adjacent to Parcel 20. USFWS Ecological Services has also provided comments related to the Endangered Species Act and the Fish and Wildlife Coordination Act and that letter is attached here. Also enclosed with this correspondence is a previous letter notifying the LRA that this proposal is in violation of federal laws.</p>
010c	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Land Use	<p>Construction of a port terminal and barge fleet cannot be completed solely within Parcel 20 because there must be connection to the Mississippi River. The Refuge borders Parcel 20 on the north, south and west sides that includes all water access routes to the river. The proposed project will extend into USFWS and U.S. Army Corps of Engineers (USACE) Rock Island District owned fee title lands and river bottom jurisdiction. Army's Environmental Assessment of LRA's Final Reuse Plan for Parcel 20 will need to consider the environmental impacts to lands and waters within two federal agency's properties, Department of Interior and Department of Army.</p>
010d	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Biological	<p>The LRA's Final Reuse Plan for Parcel 20 identifies the following project features to be constructed within USFWS fee title lands and river bottom jurisdiction: dry bulk/liquid bulk wharf (800 lineal feet); liquid bulk pipeline; floating dry dock; wharf access road; conveyor system that extends to wharf and dock; barge fleet along the east and west shorelines of Apple River Island, and; extensive dredging (approximately 400,000 cubic yards) within Brickhouse Slough extending three miles south along a backwater channel to connect to the Mississippi River. The LRA will need to submit documentation that addresses statutory requirements that preclude the use of these Federal lands for port and fleet facilities, as these proposed plans are in violation of numerous federal laws, most directly but not limited to, the National Wildlife Refuge Improvement Act of 1997.</p>
010e	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Biological	<p>Pages ii-iii and pages 17-18, Table ES-2 EcoCat and IPAC Species Summary List for Parcel 20:</p> <p>USFWS comment: These tables identify several federally endangered or threatened species may be present within Parcel 20 but "No critical habitat has been designated for this species." A significant part of the project extends into the federally owned National Wildlife Refuge in areas where federally listed species have been previously documented. The protection of Federally Listed species is a primary objective of the Refuge. The LRA will need to produce compliance documents that outline how they intend to accomplish compliance within statutory requirements.</p>
010f	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Navigation	<p>Page 3, Section 1.2.3 Previous Studies: The plan assessed the potential "...to understand the operational considerations for port development in Brickhouse Slough, the waterway immediately adjacent to the lower post area of the Savanna Industrial Park...."</p> <p>USFWS comment: A port terminal was previously proposed by the LRA at this location. In December 1996, the LRA's "Savanna Army Depot Reuse Plan and Implementation Strategy" identified development of a "Port Terminal". The Reuse Plan specifically (page 178) identified "...An ecological port feasibility study has been proposed to identify the optimal siting for it. The US Fish and Wildlife Service will assist the LRA to define a scope of work for the port study...." The LRA consulted with state and federal regulators prior to intensive planning. During the period March – October 1997, the LRA's Environmental Committee held regular meetings that included consultants Black & Veatch and MSA Professional Services, staff from state and federal agencies including USACE, USFWS, Illinois Department of Natural Resources, Savanna Army Depot Activity, and a commercial navigation advisor.</p> <p>The committee identified several concerns for developing a port terminal in this section of the Mississippi River that included: 55 wing dams are present along the 16 mile stretch of river extending north (to Lock & Dam 12) and south of the proposed port site; 15 wing dams are present in the adjacent 5 mile stretch of river where the port terminal was proposed and located on both sides (Illinois & Iowa) of the main channel; these wing dams restrict barge navigability and would not allow concentrated barge traffic, especially considering Lock & Dam 12 is located nearby, and; the Mississippi River main channel is relatively narrow and there are no shoreline fleet or mooring areas available for barges along this section of river.</p>
010g	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Biological	<p>On October 30, 1997, the LRA announced a barge terminal was not ecologically feasible due to the constraints identified by their Environmental Committee. Neither a draft report nor a final report was distributed to committee members detailing the investigation and recommendation because the LRA would no longer continue with the shoreline study and wanted to avoid paying additional costs to prepare a report.</p>
010h	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Navigation	<p>LRA is aware of the 1996 Reuse Plan proposal for the construction of a port terminal and barge fleet but has not addressed the environmental concerns previously identified by their Environmental Committee in 1997. I was an advisor to the Environmental Committee in 1997 and I am a current member of the LRA's Technical Advisory Committee. I have reminded the LRA of the environmental concerns previously identified by their Environmental Committee in 1997 but no action has been taken to address these concerns that extend outside of Parcel 2, encroach upon federal lands, and would impact wing dams, closing structures, water flows and commercial navigation.</p>
010i	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Utilities/Infrastructure	<p>Page 9, Figure 3.1 - Parcel 20 Infrastructure Map: The utilities map extends onto USFWS fee title lands and river bottom jurisdiction. USFWS comment: The LRA has not consulted with USFWS for placing utilities on lands and waters within this federal agency's jurisdiction and it is likely this proposal will not be allowed within the constraints of existing federal law.</p>
010j	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Biological	<p>Page 16, Section 3.8.7 – 2018 Unionid Survey: "EcoAnalysis reported that threatened/endangered species including the Higgins eye pearly mussel and other mussels were found in the Brickhouse slough between SIP and Apple Island...Once instream construction impacts are known...preparation of a Biological Assessment (BA) which is a step of formal consultation with the U.S. Fish & Wildlife Service and may be requested for permitting construction in the study area."</p> <p>USFWS comment: In addition to a Biological Assessment, a review of Finding of Appropriateness will be required as outlined in the National Wildlife Refuge System Improvement Act of 1997 since this proposal impacts National Wildlife Refuge lands. Federal law prohibits the construction and operation of this type of commercial facility on National Wildlife Refuges.</p>
010k	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Water	<p>Page 21, Section 3.8.11 Parcel 20 Floodplain Mapping: The entire study area is located within the 100-year floodplain.</p> <p>USFWS comment: A large solar array system is identified for construction within the floodplain (page 68, Section 8.1 Conceptual Alternatives and per Army correspondence). The LRA will need to identify a plan to prevent damage to the solar array system from large floating debris, such as dead trees, that may result in debris being scattered throughout adjacent federal lands.</p>
010l	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Navigation	<p>Page 29, Section 5 Commercial and Industrial Market Analysis: "...current USFWS ownership of the waterfront portions of the property, marine cargo uses are not currently accommodated...The upper Mississippi River...is managed through a series of locks and dams to control water flows...every effort will be made to minimize and mitigate unavoidable site impacts...."</p> <p>USFWS comment: The LRA has not consulted with USFWS to construct a port terminal and provide barge fleet on this federally owned property. Federal law prohibits the construction and operation of this type of commercial facility on National Wildlife Refuges. The plan does not identify how the LRA will minimize and mitigate unavoidable impacts to USACE jurisdictional operations to include impacts to wing dams, closing structures, water flows and commercial navigation.</p>
010m	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Land Use	<p>Page 30, Section 5.1 Technical Approach: The LRA's Technical Approach identified market opportunities analysis to create alternative layouts and concepts for potential development and operation of marine cargo facilities.</p> <p>USFWS comment: There has been no consultation with USFWS to identify the challenges for potential development and operation of marine cargo facilities within federal fee title lands and river bottom jurisdiction. Federal law prohibits the construction and operation of this type of commercial facility on National Wildlife Refuges.</p>

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Comment Number	Commenter's Information	Topic 1	Comment
010n	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Coordination/Communication	<p>Page 45, Section 5.7.2 SWOT Assessment: A "Weakness" is identified as "nearby protected environmental areas". An "Opportunity" is identified as "Federal agencies support."</p> <p>USFWS comment: The assessment does not identify a "Weakness" related to the potential for impacting commercial navigation on the Mississippi River due to the presence of wing dams, narrow main channel, and the proposed barge fleet on the west shoreline of Apple River Island. The "Opportunity" to gain "Federal agencies support" should have started with consultation with federal agencies several years ago when the planning for this project started. It is likely that federal law will prevent the use of these lands for the proposed purposes and that should be acknowledged/addressed in this proposal. Under Section 2(a) and 2(b) of the Fish and Wildlife Coordination Act, "...whenever the waters of any stream or waterbody are proposed or authorized to be...modified for any purpose whatever, ...by any department or agency of the United States, or by any public or private agency under Federal permit or license, such department or agency first shall consult with the United States Fish and Wildlife Service and with the head of the agency exercising administration over the wildlife resources of the particular State..." As such, this requires timely notification to the Service and state conservation agency concerning the proposed project to ensure "...that wildlife conservation shall receive equal consideration and be coordinated with other features of water-resource development programs through effectual and harmonious planning..." This Final Reuse Plan proposal is the first occurrence of direct coordination with USFWS since project initiation. Due to the project's positioning within and adjacent to areas owned and managed as part of the Upper Mississippi River National Wildlife and Fish Refuge and documented protected species are present within the project area, USFWS recommends timely initiation of coordination with Refuge staff to better understand limitations of use of these federally protected lands.</p>
010o	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Coordination/Communication	<p>Page 60, Section 7.2.1 Stakeholder Identification: "A list of key stakeholders was developed in close coordination with the LRA. The list includes tenants, resource agencies...."</p> <p>USFWS comment: USFWS is a key stakeholder since a large part of the project extends onto federal agency lands and river bottom jurisdiction. USFWS has provided many comments and concerns on this project dating back to the 1996 Reuse Plan. A May 22, 2017, letter (see attachment) was sent to consultant Linda Balcom once again expressing these concerns. Ms. Balcom is currently a consultant (Balcom Environmental Services) for the LRA and was a major contributor to this Final Reuse Plan for Parcel 20. The LRA has not addressed USFWS concerns expressed in the past nor within this present Final Reuse Plan for Parcel 20.</p>
010p	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Coordination/Communication	<p>Page 61, Section 7.2.2 Technical Advisory Committee: Two TAC meetings have been held to discuss the Final Reuse Plan for Parcel 20 to construct a port terminal and provide barge fleet.</p> <p>USFWS comment: I am a member of the TAC, have attended both meetings, and provided USFWS concerns about this proposed plan that encroaches upon USFWS lands and river bottom jurisdiction. The LRA has made no attempt to consult with USFWS to address these concerns.</p>
010q	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Land Use	<p>Page 65, Section 7.2.6 Public and TAC input: "Concerns" section identifies "Dredging and environmental issues in Brickhouse Slough...Wing dams in the vicinity of Apple Island...Impacts to wetlands...Development in floodplain...."</p> <p>USFWS comment: The "Concerns" section does not identify that a large part of the Final Reuse Plan for USFWS comment: The "Concerns" section does not identify that a large part of the Final Reuse Plan for Parcel 20 extends onto lands and river bottom jurisdiction of two federal agencies, Department of Interior and Department of Army, and lands owned and managed as National Wildlife Refuge. There has been no effort by LRA to address the "Concerns" issues despite several years of planning.</p>
010r	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Coordination/Communication	<p>Page 67, Section 8 Redevelopment Alternatives: The plan identifies there are "environmental and ecological considerations and constraints" due to the project lies within the Upper Mississippi River National Wildlife and Fish Refuge.</p> <p>USFWS comment: Several years of planning have gone into completion of the LRA's Final Reuse Plan for Parcel 20. LRA is aware the project will extend onto the Refuge and will impact federal lands and river bottom jurisdiction. The National Wildlife Refuge System Improvement Act of 1997 prohibits commercial use of National Wildlife Refuges. However, no effort has been made to consult with USFWS to discuss federal laws that prohibit these activities. Planning has also proceeded without addressing significant concerns identified during the LRA's 1996 "Savanna Army Depot Reuse Plan and Implementation Strategy" which resulted in discarding the construction of a port terminal and barge fleet due to environmental concerns and challenges identified by state and federal regulators.</p>
010s	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Land Use	<p>Page 68, Section 8.2 Alternative 1: Brick House Slough: This alternative identifies the following structures to be built within USFWS lands and river bottom jurisdiction: dry bulk/liquid bulk wharf (800 lineal feet); liquid bulk pipeline; floating dry dock; wharf access road; conveyor system that extends to wharf and dock; barge fleet along the east and west shorelines of Apple River Island, and; extensive dredging (approximately 400,000 cubic yards) within Brickhouse Slough extending three miles south along a backwater channel to connect to the Mississippi River.</p> <p>USFWS comment: LRA has not consulted with USFWS on construction of these structures. The Refuge was established by an act of Congress in 1924 for the purpose of providing a refuge and breeding place for migratory birds, fish, other wildlife and plants. The Refuge is part of the National Wildlife Refuge System and is protected and governed by many federal laws and regulations with conservation of fish, wildlife and habitat as its primary mission. National Wildlife Refuges are required to evaluate the appropriateness and compatibility of any proposed "uses". Port facilities and barge fleet are not considered to be appropriate and compatible uses of Refuge lands and waters. The LRA needs to identify how they intend to meet the appropriateness and compatibility requirements for their proposed plan that will encroach upon the Refuge. Federal law prohibits the construction and operation of this type of commercial facility on National Wildlife Refuges.</p>
010t	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Land Use	<p>Page 71, Section 8.3 Alternative 2: Commander's Pond Lite: This alternative identifies the following structures to be constructed within USFWS lands and river bottom jurisdiction: dry bulk/liquid bulk wharf (800 lineal feet); liquid bulk pipeline; floating dry dock; wharf access road; conveyor system that extends to wharf and dock; barge fleet along the east and west shorelines of Apple River Island, and; extensive dredging (approximately 400,000 cubic yards) within Brickhouse Slough extending three miles south along a backwater channel to connect to the Mississippi River.</p> <p>USFWS comment: See comment above for Alternative 1.</p>
010u	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Land Use	<p>Page 73, Section 8.4 Alternative 3: Commander's Pond Full: LRA's preferred alternative identifies the following structures to be constructed within USFWS lands and river bottom jurisdiction: dry bulk/liquid bulk wharf (800 lineal feet); liquid bulk pipeline; floating dry dock; wharf access road; conveyor system that extends to wharf and dock; barge fleet along the east and west shorelines of Apple River Island, and; extensive dredging (approximately 400,000 cubic yards) within Brickhouse Slough extending three miles south along a backwater channel to connect to the Mississippi River.</p> <p>USFWS comment: See comment above for Alternative 1.</p>
010v	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Biological	<p>Page 76, Section 9.1 Description of Preferred Alternative:</p> <p>USFWS comment: See comment above for Alternative 1.</p> <p>In addition, Aquatic Habitat Restoration is identified as a project feature, however, there are no details provided regarding what this element of the project will entail. Additional information is needed to aid in a full evaluation of the proposed project.</p>
010w	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Navigation	<p>Page 79, Section 9.3 Dredging Estimate: Figure 9-2 is a map of proposed dredge areas for the project.</p> <p>USFWS comment: The preferred alternative identifies the excavation of 1,237,450 cubic yards of material that includes 304,808 cubic yards of contaminated material. Details are not provided regarding the destination of the material (contaminated and non-contaminated), how it will be handled and transported, nor what is the plan to manage potential releases and/or fish and wildlife resource exposure during construction of the project. Additional information is needed to aid in a full evaluation of the proposed project. The dredging map does not identify river miles; however, it appears the dredge cut extends north to the closing dam in Brickhouse Slough and south to the closing dam in the channel that provides access to the river. The LRA needs to provide a navigation map that shows river miles that will aid in an evaluation of potential environmental impacts from dredging that may occur along the access route to the Mississippi River. The Final Reuse Plan for Parcel 20 needs to identify potential impacts of dredging to closing dams present within or adjacent to the project area. The expenditures tables need to identify the cost of annual dredging needed to keep the project area and access route deep enough to accommodate tow boats and barges.</p>
010x	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Coordination/Communication	<p>Page 87, Assumptions: Construction will take place from 2024 – 2028.</p> <p>USFWS comment: Consultation with USFWS should begin immediately if construction is proposed in 2024 since this proposal is in violation of the National Wildlife Refuge System Improvement Act of 1997.</p>
010y	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Coordination/Communication	<p>Page 93, Next Steps: "Key next steps to advance the process include...Coordination with regulatory partners – state and federal...."</p> <p>USFWS comment: Many years of planning have gone into the LRA's Final Reuse Plan for Parcel 20 without coordination with regulatory partners despite many attempts by USFWS to engage the LRA in conversations to discuss our concerns. The concerns previously identified by state and federal regulators during the LRA's 1996 "Savanna Army Depot Reuse Plan and Implementation Strategy" environmental feasibility study for a port terminal and barge fleet project were not considered during the current planning effort.</p>
010z	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Land Use	<p>In summary, there will be environmental impacts to natural resources that extend beyond the Parcel 20 boundary regardless of which alternative the LRA chooses. All three Final Reuse Plan alternatives include structures, barge fleet and dredging that encroach upon land and river bottom jurisdiction within the Upper Mississippi River National Wildlife and Fish Refuge. The LRA will need to address the concerns identified above, provide the necessary compliance documents and justifications that will allow USFWS staff to complete a Finding of Appropriateness required by the National Wildlife Refuge System Improvement Act of 1997, and complete coordination with USFWS required by the Fish and Wildlife Coordination Act. It is likely that federal law will prevent the use of USFWS lands for LRA's proposed Final Reuse Plan for Parcel 20 and that should be acknowledged/addressed in the plan.</p>

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Comment Number	Commenter's Information	Topic 1	Comment
011a	Name: Kraig McPeck Organization: USFWS, Illinois-Iowa Field Office Affiliation: Federal Government Opinion: Neutral	Other	Thank you for the opportunity to provide comments regarding the preparation of an Environmental Assessment (EA) to evaluate potential effects of the Army's transfer of and Jo-Carroll Depot Local Redevelopment Authority's (LRA) proposed Reuse Plan for Parcel 20 of the Savanna Army Depot Activity site. According to the Reuse Plan, Parcel 20 encompasses 132.2 acres at the southern end of the Depot in Carroll County, Illinois. It is bordered by the Army Depot Road, Apple River, the Sewer Treatment Plant, and additional parcels. Parcel 20 is comprised of a pond, landfill, and low-lying forested wetland areas associated with the Apple River. The purpose of the Reuse Plan is to assess the redevelopment potential of this parcel. The proposed LRA Preferred Alternative outlined in the Reuse Plan includes construction of multiple barge floating areas and wharfs, dry docks, piers, dry storage areas, liquid storage tanks, grain silos, a fertilizer warehouse, rail spurs, aquatic restoration, trails, and a solar array along with associated access roads, conveyors, and pipelines. Our office has reviewed the Reuse Plan and supporting documents and offers the following comments.
011b	Name: Kraig McPeck Organization: USFWS, Illinois-Iowa Field Office Affiliation: Federal Government Opinion: Neutral	Coordination/Communication	All alternatives outlined in the Reuse Plan contain proposed features that would be constructed outside the footprint of Parcel 20. We recommend all areas containing proposed features be thoroughly coordinated with the relevant land owners/ managers and included when evaluating general environmental impacts and effects to federally listed species and fish and wildlife resources.
011c	Name: Kraig McPeck Organization: USFWS, Illinois-Iowa Field Office Affiliation: Federal Government Opinion: Neutral	Navigation	Additionally, numerous navigation structures (i.e. wing dams, closing dams) are present within and adjacent to the proposed barge mooring and dredging area footprints, with proposed barge mooring locations along Apple River Island having the potential to interfere with commercial navigation traffic. Coordination should be initiated with the U.S. Army Corps of Engineers to determine the potential for commercial navigation impacts as a result of the project.
011d	Name: Kraig McPeck Organization: USFWS, Illinois-Iowa Field Office Affiliation: Federal Government Opinion: Neutral	Biological	Section 7 of the Endangered Species Act of 1973 requires that actions authorized, funded, or carried out by Federal agencies not jeopardize federally threatened or endangered species or adversely modify designated critical habitat. To fulfill this mandate, Federal agencies (or their designated non-federal representative) must consult with the Service if they determine their project "may affect" listed species or critical habitat. In order for you to evaluate the potential effects of projects on your site on federally listed species, you can download a list of species from the Service's Information for Planning and Consultation (IPaC) website at https://ipac.ecosphere.fws.gov/ . Please note that official species lists are valid for 90 days and should be updated accordingly prior to consultation initiation.
011e	Name: Kraig McPeck Organization: USFWS, Illinois-Iowa Field Office Affiliation: Federal Government Opinion: Neutral	Biological	Habitat descriptions for listed species can also be found on the IPaC website. You may use these descriptions to help you determine if there is suitable habitat within your project area. If no suitable habitat exists within your project area or its area of impact, and no species or critical habitat is present, it is appropriate to determine the project will have "no effect" on listed species. If you determine the action will have "no effect" on listed species or critical habitat, concurrence with that determination from the Service is not required. The Illinois-Iowa Ecological Services Field Office has no regulatory or statutory authority for concurring with "no effect" determinations. However, we recommend you maintain a written record of your "no effect" determination and include it in your decision record. An example "no effect" memo can be found on our website at https://www.fws.gov/media/no-effect-habitat-letter .
011f	Name: Kraig McPeck Organization: USFWS, Illinois-Iowa Field Office Affiliation: Federal Government Opinion: Neutral	Biological	If suitable habitat is found in the area of your project, the appropriate determination is that the project "may affect" listed species. In some instances, surveys may be recommended to help make this determination. When designating your project location for Section 7 purposes, the Service recommends that you consider not only the physical location of all project features, but also any surrounding area on the landscape where potential effects to species may occur due to project activities. Additional information on how to make accurate effect determinations and how to document your determination can be found on our website at https://www.fws.gov/media/information-requirements-section-7-consultation .
011g	Name: Kraig McPeck Organization: USFWS, Illinois-Iowa Field Office Affiliation: Federal Government Opinion: Neutral	Biological	The Reuse Plan does not currently include a discussion of the "with project" effects on ecological resources and protected species associated with the preferred alternative. When assessing potential effects on listed species through preparation of the EA and associated section 7 determinations under the Endangered Species Act, all project actions that have the potential to affect federally listed species or their habitat should be considered, including but not limited to: <input type="checkbox"/> Consider how barges will be secured within the floating area (installation of mooring structures, grounding, tying off onto trees, motor power) and whether any of these actions result in potential impacts to federally listed species or their habitat. <input type="checkbox"/> Consider all areas that may require dredging, including ingress/ egress pathways for barges and any future maintenance dredging needs. <input type="checkbox"/> Consider all areas of tree clearing that may be necessary for the construction of project infrastructure. <input type="checkbox"/> Consider effects of additional barge traffic within the side channel and Apple River Island peripheries (wave-generated erosion, prop-wash, etc.). <input type="checkbox"/> Consider the potential for spills or other releases within aquatic and terrestrial areas associated with "minor repair" activities and the transfer of commodities. <input type="checkbox"/> Consider areas of historic landfills and other sources of contamination and how exposure routes will be managed through construction and operation of the project.
011h	Name: Kraig McPeck Organization: USFWS, Illinois-Iowa Field Office Affiliation: Federal Government Opinion: Neutral	Biological	Freshwater Mussels Two federally endangered freshwater mussel species are known to occur in Pool 13 of the Upper Mississippi River, including Higgins eye pearlshell (<i>Lampsilis higginsii</i>) and sheepsnose mussel (<i>Plethobasus cyphus</i>). Additional information, including ideal habitat conditions for these species can be found at the following links: Higgins eye pearlshell: https://www.fws.gov/species/higgins-eye-lampsilis-higginsii Sheepsnose: https://www.fws.gov/species/sheepsnose-plethobasus-cyphus As noted in the Reuse Plan, EcoAnalysts conducted a mussel survey at two potential terminal construction sites within the slough adjacent to Parcel 20 in 2018. The survey identified a mussel bed extending between the two survey sites and collected the federally endangered Higgins eye pearlshell. As a result, we recommend consideration be given to completing a freshwater mussel survey further evaluating the extent of anticipated aquatic impacts. Additionally, please note, we generally consider mussel surveys valid for a period of five years.
011i	Name: Kraig McPeck Organization: USFWS, Illinois-Iowa Field Office Affiliation: Federal Government Opinion: Neutral	Biological	Bats Two federally endangered bat species are known to have ranges overlapping the project area. We recommend consideration be given to avoiding and minimizing potential impacts to these species, including minimizing tree clearing to the extent practicable and limiting tree removal activities to timeframes outside of the maternity roosting season (October 1 through March 31).
011j	Name: Kraig McPeck Organization: USFWS, Illinois-Iowa Field Office Affiliation: Federal Government Opinion: Neutral	Biological	Additionally, the Service has proposed an endangered listing status for the tricolored bat (<i>Perimyotis subflavus</i>). If the proposed project extends beyond the final listing decision for the tricolored bat, reinitiation of consultation may be necessary. Finally, the little brown bat (<i>Myotis lucifugus</i>), is currently under review and a listing decision may occur prior to the initiation of project construction. Please also re-initiate consultation, as appropriate, following release of this final listing determination if it occurs.
011k	Name: Kraig McPeck Organization: USFWS, Illinois-Iowa Field Office Affiliation: Federal Government Opinion: Neutral	Biological	Additional Information Finally, the Reuse Plan states that, "Construction will take place from 2024 through 2028" (page 87). Please note, should it be determined that federally listed species may be adversely affected as a result of the project, formal consultation would likely be warranted. This process may take up to 135 days from the initiation of formal consultation. Additionally, the Service published final policies on Mitigation Impacts of Development to Further Conservation (May 12, 2023) that will be considered, should formal consultation be warranted. https://www.fws.gov/press-release/2023-05/final-policies-mitigating-impacts-development-further-conservation .
011l	Name: Kraig McPeck Organization: USFWS, Illinois-Iowa Field Office Affiliation: Federal Government Opinion: Neutral	Biological	Fish and Wildlife Resources Under Section 2(a) and 2(b) of the Fish and Wildlife Coordination Act, "...whenever the waters of any stream or waterbody are proposed or authorized to be...modified for any purpose whatever...by any department or agency of the United States, or by any public or private agency under Federal permit or license, such department or agency first shall consult with the United States Fish and Wildlife Service and with the head of the agency exercising administration over the wildlife resources of the particular State..." As such, this requires timely notification to the Service and state conservation agency concerning the proposed project to ensure "...that wildlife conservation shall receive equal consideration and be coordinated with other features of water-resource development programs through effectual and harmonious planning..." It is our understanding that this is the first occurrence of direct coordination with the Service since project initiation. Due to the project's positioning within and adjacent to areas owned and managed as part of the Upper Mississippi River National Wildlife and Fish Refuge, documented protected species within the project area, and the presence of contaminants throughout the site, we recommend timely and continued coordination with the Service moving forward.
011m	Name: Kraig McPeck Organization: USFWS, Illinois-Iowa Field Office Affiliation: Federal Government Opinion: Neutral	Hazardous Materials/Waste	The Reuse Plan references historic landfills and other sources of contamination throughout the proposed project; however, a plan to manage potential releases and/ or fish and wildlife resource exposure during construction and operation of the project is not included. Additionally, Section 9.3 of the plan references up to 1,237,450 cubic yards of material, consisting of both contaminated and non-contaminated material, that may be dredged as part of the project; however, details are not provided regarding the final destination of the material or how it will be handled and transported. Finally, several sections of the document reference an "Aquatic Restoration Area." However, there are no details provided regarding what this element of the project will entail. We recommend additional information regarding these elements be discussed and included within the EA to aid in a full evaluation of the proposed project.

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Comment Number	Commenter's Information	Topic 1	Comment
011n	Name: Kraig McPeck Organization: USFWS, Illinois-Iowa Field Office Affiliation: Federal Government Opinion: Neutral	Biological	Finally, we recommend that the Corps be contacted should any potential wetland or stream impacts be expected as part of the project.
011o	Name: Kraig McPeck Organization: USFWS, Illinois-Iowa Field Office Affiliation: Federal Government Opinion: Neutral	Biological	Migratory Birds The Service removed bald eagles from protection under the Endangered Species Act on August 8, 2007. However, they remain protected today under the Migratory Birds Treaty Act and the Bald and Golden Eagle Protection Act (Eagle Act). The Eagle Act prohibits take which is defined as, "pursue, shoot, shoot at, poison, wound, kill, capture, trap, collect, destroy, molest, or disturb" (50 CFR 22.3). Disturb is defined in regulations as, "to agitate or bother a bald or golden eagle to a degree that causes, or is likely to cause, based on the best scientific information available, 1) injury to an eagle, or 2) decrease in its productivity, by substantially interfering with normal breeding, feeding, or sheltering behavior." Please contact the Region 3 Migratory Bird Office at https://www.fws.gov/program/migratory-bird-permit/contact-us should activities that have the potential to result in take or disturbance of eagles or their nests be necessary.
011p	Name: Kraig McPeck Organization: USFWS, Illinois-Iowa Field Office Affiliation: Federal Government Opinion: Neutral	Other	Conclusion These comments provide technical assistance only and do not constitute the report of the Secretary of the Interior on the project within the meaning of Section 2(b) of the Fish and Wildlife Coordination Act, do not fulfill the requirements under Section 7 of the Endangered Species Act, nor do they represent the review comments of the U.S. Department of the Interior on any forthcoming environmental statement. If you have questions regarding these comments, please feel free to contact Illinois-Iowa Ecological Services Field Office staff Lauren Larson at lauren_larson@fws.gov or Sara Schmucker at sara_schmucker@fws.gov .
012a	Name: Charlene Falco Organization: Illinois EPA Affiliation: State Government Opinion: Neutral	Coordination/Communication	The Illinois Environmental Protection Agency (Illinois EPA) provides the following response to the Department of the Army's August 8, 2024 letter regarding Early Coordination for a Supplemental Environmental Impact Statement for the Implementation of Base Realignment and Closure Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity. The letter seeks Illinois EPA's input on "resources of concern to [the] Agency or questions concerning this BRAC action." The letter seeks input regarding the Supplemental Environmental Impact Statement (SEIS) by asking for Illinois EPA input on holding an Agency meeting separate from the public scoping meeting and any additional comments to those provided in Illinois EPA correspondence of February 1, 2024. Illinois EPA provides no additional comments at this time, beyond that provided on February 1, 2024, but reserves the right to provide additional comments based on any questions or issues that arise through scoping meetings, reports, or otherwise. For convenience, Illinois EPA provides a copy of its February 1, 2024 comments as an attachment to this letter. Illinois EPA supports a scoping meeting to be held among all relevant Agencies separate from the public scoping meeting. Please keep Illinois EPA informed of any developments regarding the scoping meeting(s). Thank you for the opportunity to provide input regarding the SEIS. If you have any questions or wish to discuss anything further, please contact me at 217-785-2891 or at Charlene.falco@illinois.gov .
013a	Name: Charlene Falco Organization: Illinois EPA Affiliation: State Government Opinion: Neutral	Coordination/Communication	The Illinois Environmental Protection Agency (Illinois EPA) has reviewed the Department of the Army's December 14, 2023 letter regarding Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois. The letter seeks Illinois EPA's input on "resources of concern to [the] Agency or questions concerning this BRAC action." The letter seeks input presumably to inform the Environmental Assessment, which is in the process of being prepared. Illinois EPA's comments below focus on the status of the existing sites regulated by the Comprehensive Environmental, Response, Compensation, and Liability Act (CERCLA) and general guidance on a potential solar installation. Please note that Illinois EPA has no experience with the property transfer mechanisms described (early transfer or interim use lease agreement). The LRA or Army should provide any specific questions they may have to the State for consideration. Illinois EPA's comments do not provide a comprehensive regulatory and permitting review for the Local Reuse Authority's (LRA) Alternative 3. This letter does not address future conveyance or transfer of the site, or portions thereof, to any person or entity, nor should it be construed as providing an assurance that the site is fit for any particular purpose or use. Be advised that Illinois EPA has no authority to approve or disapprove property transfers or lease arrangements. The parties receiving the properties are responsible for determining their potential liability, reporting, and permitting requirements.
013b	Name: Charlene Falco Organization: Illinois EPA Affiliation: State Government Opinion: Neutral	Hazardous Materials/Waste	<u>CERCLA Sites</u> Illinois EPA is not aware of any environmental permitted facilities within the boundaries of Parcel 20, though the sewage treatment plant (NPDES permit IL0027049) is adjacent, but not part of Parcel 20. Parcel 20 includes three National Priorities List (NPL) cleanup sites: Site 73, the Stables Dump, Site 178, Ordnance School Lake, and Site 20, the Old Landfill (or Apple River Landfill). (The parcel also includes two other sites, Sites 77 and 130 that were initially evaluated, and determined to not require further investigation or remediation.) Their current status based on Illinois EPA files is as follows: *Site 20, Old Landfill: This site is in a long-term monitoring phase to ensure the integrity of the landfill cover and to monitor groundwater. Because wastes are still present, the remediation objectives and scope of the remedy did not achieve unlimited use/unrestricted exposure (UU/UE); and therefore, land use controls are required to be maintained as long as the wastes are in place. The Land Use Control Implementation Plan (LUCIP) documenting the land use controls is final, though the environmental covenant is still draft. This site may also require additional investigation related to PFAS. *Site 73, Stables Dump: Illinois EPA understands that cleanup was conducted to UU/UE levels, and thus no additional environmental cleanup action is warranted and no institutional controls are planned to be implemented for this property. *Site 178, Ordnance School Lake: While a cleanup was conducted, the remedial goals focused on reducing risks to populations of workers and recreational users; and therefore, the remedy was not scoped to achieve UU/UE. Contamination is still present at levels that would pose risks to other types of receptors (e.g., hypothetical residential users). The presence and source of other chemicals such as DDD and DDT were not fully explored, though appropriate risk management decisions were made for the target receptor populations. In other words, while a cleanup was conducted, this does not mean that contamination is no longer present in lake soils and sediments. Because UU/UE was not achieved, land use controls are required for the property. Army has not yet submitted the LUCIP or draft environmental covenant for Site 178. *Five-year reviews are required until the property is deemed protective of unlimited use/unrestricted exposure or until wastes are no longer present. Currently, the five year reviews conducted at SVDA include Sites 20, 73, and 178.
013c	Name: Charlene Falco Organization: Illinois EPA Affiliation: State Government Opinion: Neutral	Hazardous Materials/Waste	Illinois EPA's primary concern regarding re-use of any property with sites that have not achieved UU/UE is that the integrity of the remedy is preserved. The LRA-preferred alternative, Alternative 3, includes a recreational area on top of the Site 20 landfill cover, dredging of Site 178 with installation of a lift-on/lift-off wharf, and no apparent change in use for Site 73 (i.e., non-maintained open space/natural area). Illinois EPA provides the following considerations, which do not appear to be addressed in the LRA's reuse plan: *Any recreational area provided at Site 20 must preserve the integrity of the landfill cover (which is two feet thick) and must not contribute to any erosion that may lead to exposure of wastes. Vegetation established on the cover is considered a protective layer for the soil cover. Any other surface layer established (e.g., parking lot, concrete slab, etc.) must be maintained in such a way as to protect the soil cover beneath it. No intrusions into the soil cover would be allowed, so installation of any features may necessitate bringing in additional soil to ensure protectiveness of the cover and that at least two feet of cover is maintained over the waste. Any groundwater monitoring wells must be protected, maintained, and remain accessible. *Should Site 20 be discovered to be a source of PFAS contamination, Illinois EPA would expect an appropriate investigation to be scoped and conducted, with additional remediation and/or additional long-term monitoring, as warranted. Whether or not use of the property would be further restricted is unknown. *In regard to Site 178, Ordnance School Lake, the lower levels of contamination and/or unknown concentrations of other chemicals within lake sediments, surface water, and/or soils within the lake or on the lake banks/perimeter may have ramifications for disposal or management options of dredged soil and sediment. Additional characterization of the non-remediated portions of the lake should be conducted. *In the reuse plan (Figure 9-2, page 97), it is not clear how the distinction between "contaminated" and "non contaminated" is being made for the volumes of dredged material from Ordnance School Lake. No discussion is included regarding characterization of dredged material or disposal/management of such material. No information has been provided regarding how the estimated acreages were determined (e.g., 16 acres for habitat restoration); no discussion is included regarding impacts to jurisdictional wetlands and need for mitigation. *Alternatives 2 and 3 call for substantial dredging of Ordnance School Lake as well as shoreline areas between the Lake and Brickhouse Slough (Mississippi River) in order to create a new surface water connection to the Mississippi River. As such, Illinois EPA's concerns would include any potential pollutant loading to the Mississippi River caused by resuspension of sediments during the construction activity and all measures that would be implemented to monitor and mitigate this concern. There appears to be no sediment data available for evaluating the potential ecological harm from dredging and sediment handling activities, including disposal. Illinois EPA is responsible for issuing Clean Water Act Section 401 water quality certifications, and such a certification would be required for any discharges of dredged or fill materials within Waters of the U.S. which includes dewatering flows from upland disposal activities. Such permitting will require extensive sediment chemical analyses and resuspension testing to adequately characterize the potential pollutant loading that would result from the project. *Since the sites on Parcel 20 are regulated by CERCLA, the Army retains certain obligations regarding maintenance of remedies, protectiveness, and liability or potential liability related to any releases or mismanagement of wastes or contamination moved within the Parcel or removed from the Parcel. Illinois EPA will continue to look to the Army for maintenance of remedial components consistent with the Records of Decision, LUCIPs and environmental covenants.
013d	Name: Charlene Falco Organization: Illinois EPA Affiliation: State Government Opinion: Neutral	Hazardous Materials/Waste	<u>Solar Development</u> The Army's letter makes brief reference to a potential solar energy facility atop the capped landfill. Illinois EPA's primary concern is that the design, construction, operation, and maintenance of any solar facility does not interfere with any of the remedial, operational, or maintenance components of the landfill, including the access road, new cover, groundwater monitoring wells, and protective vegetation. While Illinois EPA will expect to receive a copy of the design for review as it pertains to the remedy, Illinois EPA does not/will not approve, endorse, or provide technical support for any specific project. Any planning regarding a solar facility at Site 20 should take into consideration: *the installation, operation, and maintenance of the system features installed within the footprint of Parcel 20, including any foundations or anchorage associated with the system or its components. *Needed demonstrations that the installation, operation and maintenance of the system will not compromise the environmental monitoring and control systems, such as the final cover (including protective vegetation) or groundwater monitoring wells. *Needed demonstrations that the installation, operation and maintenance of the system will not compromise the landfill footprint or landfill area regarding run-off, pooling or ponding water, erosion, etc. *Needed demonstrations of settlement and stability analyses showing that any solar facility components installed on the landfill cover will not adversely affect the final cover system. These analyses should also take into account the dead load of the system as well as consideration for wind and snow loading.
013e	Name: Charlene Falco Organization: Illinois EPA Affiliation: State Government Opinion: Neutral	Coordination/Communication	Thank you for the opportunity to provide input prior to release of the Environmental Assessment. If you have any questions or wish to discuss anything further, please contact me at 217-785-2891 or at Charlene.falco@illinois.gov .

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Comment Number	Commenter's Information	Topic 1	Comment
014a	Name: Bradley Hayes Organization: Illinois DNR Affiliation: State Government Opinion: Neutral	Proposed Action/Alternatives	The Department has received your request for comments for the above referenced project and appreciates the opportunity to provide comments to ensure Illinois' natural resources are considered in the future Environmental Assessment. The Department works closely with the Illinois Environmental Protection Agency (IL EPA) in response to abandoned, uncontrolled hazardous waste sites per the Comprehensive Environmental Response, Compensation and Liability Act, and recognize for this proposed project, coordination with IL EPA and US EPA may be necessary and is separate from this review. The proposed project, as described by the U.S. Fish and Wildlife Service is as follows: An Environmental Assessment of Jo Carol Depot Local Redevelopment Authority's (LRA) proposed Final Reuse Plan for Parcel 20 that identifies construction of a port terminal and barge fleet, Parcel 20 contains 132 acres that is bordered by federal property. Construction of a port terminal and barge fleet cannot be completed solely within Parcel 20 because there must be connection to the Mississippi River. The Refuge borders Parcel 20 on the north, south and west sides that includes all water access routes to the river. The LRA's Final Reuse Plan for Parcel 20 identifies the following project features to be constructed within USFWS fee title lands and river bottom jurisdiction: dry bulk/liquid bulk wharf (800 lineal feet); liquid bulk pipeline; floating dry dock; wharf access road; conveyor system that extends to wharf and dock; barge fleet along the east and west shorelines of Apple River Island, and; extensive dredging (approximately 400,000 cubic yards) within Brickhouse Slough extending three miles south along a backwater channel to connect to the Mississippi River.
014b	Name: Bradley Hayes Organization: Illinois DNR Affiliation: State Government Opinion: Neutral	Biological	The Illinois Natural Heritage Database shows the following protected resources may be in the vicinity of the project location: <u>Illinois Natural Areas Inventory (INAI)</u> Savanna Army Depot <u>State Threatened or Endangered Species</u> Butterfly (<i>Ellipsaria lineolata</i>) Higgins Eye (<i>Lampsilis higginsii</i>) James' Clammyveed (<i>Polarisa jamesii</i>) Pallid Shiner (<i>Hypopsis amnis</i>) Plains Hog-nosed Snake (<i>Heterodon nasicus</i>) Sheepnose (<i>Plethobasus cyphus</i>) ¹ Weed Shiner (<i>Notropis texanus</i>) Western Sand Darter (<i>Ammocrypta clara</i>)
014c	Name: Bradley Hayes Organization: Illinois DNR Affiliation: State Government Opinion: Neutral	Biological	Please note that due to the federal status of the Higgins Eye and Sheepnose mussels, and their potential occurrence in the project area, coordination with the U.S. Fish and Wildlife Service may be necessary and is separate from this consultation and Illinois State regulations.
014d	Name: Bradley Hayes Organization: Illinois DNR Affiliation: State Government Opinion: Neutral	Biological	The Department offers the following comments to aid in avoiding and minimizing impact to protected resources and natural areas, while providing conservation benefits to natural resources in the Mississippi River and adjacent natural areas: Based on the known State-listed species in the project vicinity and the potential for suitable habitat for these species in the area proposed for development, the Department recommends that avian, herpetological, botanical, fish, and mussel surveys be conducted to confirm the absence or presence of these species. Survey proposals should be sent to this office for concurrence on methods, along with the results for final comment. Subsequently, if these species are identified during the survey, it is likely that the Department would recommend the applicant seek an Incidental Take Authorization (ITA) pursuant to Part 1080 and Section 5.5 of the Illinois Endangered Species Protection Act for any future action permitted in the project area.
014e	Name: Bradley Hayes Organization: Illinois DNR Affiliation: State Government Opinion: Neutral	Biological	The natural resource review reflects the information existing in the Illinois Natural Heritage Database at the time of this proposal submittal 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 development and possible implementation, the applicant must comply with the applicable statutes and regulations.
014f	Name: Bradley Hayes Organization: Illinois DNR Affiliation: State Government Opinion: Neutral	Biological	This letter does not serve as permission to take any listed or endangered species. As a reminder, no take of an endangered species is permitted without an Incidental Take Authorization or the required permits. Anyone who takes a listed or endangered species without an Incidental Take Authorization or required permit may be subject to criminal and/or civil penalties pursuant to the Illinois Endangered Species Act, the Fish and Aquatic Life Act, the Wildlife Code and other applicable authority.
015a	Name: Robert Appleman Organization: Illinois DNR, SHPO Affiliation: State Government Opinion: Neutral	Cultural/Historic	Thank you for requesting comments from our office concerning the possible effects of the project referenced above on cultural resources. Our comments are required by Section 106 of the National Historic Preservation Act of 1966 (16 USC 470), as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties".
015b	Name: Robert Appleman Organization: Illinois DNR, SHPO Affiliation: State Government Opinion: Neutral	Cultural/Historic	The project area has not been surveyed and may contain prehistoric/historic archaeological resources. Accordingly, a Phase I archaeological reconnaissance survey to locate, identify, and record all archaeological resources within the project area will be required. This decision is based upon our understanding that there has not been any large scale disturbance of the ground surface (excluding agricultural activities) such as major construction activity within the project area which would have destroyed existing cultural resources prior to your project. If the area has been heavily disturbed prior to your project, please contact our office with the appropriate written and/or photographic evidence. The area(s) that need(s) to be surveyed include(s) all area(s) that will be developed as a result of the issuance of the federal agency permit(s) or the granting of the federal grants, funds, or loan guarantees that have prompted this review. In addition to the archaeological survey please provide clear photographs of all structures in, or adjacent to, the current project area as part of the archaeological survey report. Enclosed you will find an attachment briefly describing Phase I surveys and a list of archaeological contracting services. THE SHPO LOG NUMBER OR A COPY OF THIS LETTER SHOULD BE PROVIDED TO THE SELECTED PROFESSIONAL ARCHAEOLOGICAL CONTRACTOR TO ENSURE THAT THE SURVEY RESULTS ARE CONNECTED TO YOUR PROJECT PAPERWORK.
015c	Name: Robert Appleman Organization: Illinois DNR, SHPO Affiliation: State Government Opinion: Neutral	Coordination/Communication	If you have further questions, please contact Jeff Kruchten, Chief Archaeologist at 217/785-1279 or Jeffery.kruchten@illinois.gov.
016a	Name: Robert Appleman Organization: Illinois DNR, SHPO Affiliation: State Government Opinion: Neutral	Cultural/Historic	We have reviewed the documentation provided for the above referenced project. In our opinion, the project as proposed will have no adverse effect on sites 11CA1 & 142 which have not been evaluated for listing on the National Register of Historic Places as defined in 36 CFR Part 800.5 (b). Site 11CA194 is not eligible for listing on the National Register of Historic Places. If these plans should be modified, please notify our office. Please retain this letter as evidence of compliance with Section 106 of the National Historic Preservation Act of 1966, as amended. If you have any further questions please contact Jeff Kruchten, Chief Archaeologist at 217/785-1279 or Jeffery.kruchten@illinois.gov.
017a	Name: Eben Crawford Organization: Winnebago Tribe of Nebraska Affiliation: Native American Tribe/Organization Opinion: Neutral	Cultural/Historic	My name is Eben Crawford, I am temporarily serving as THPO for the Winnebago Tribe of Nebraska until a new candidate is selected in mid-march. Emily DeLeon has not served as THPO for some time, so please address all future communication to "The Office of the THPO". Our office recently received a letter from you regarding the EA preparation for Parcel 20. The Winnebago Tribe of Nebraska has no known sites in the area, and thus no concerns with this project.
018a	Name: Diane Hunter Organization: Miami Tribe of Oklahoma Affiliation: Native American Tribe/Organization Opinion: Neutral	Cultural/Historic	Aya, kikwehsitoole – I show you respect. My name is Diane Hunter, and I am the Tribal Historic Preservation Officer for the Federally Recognized Miami Tribe of Oklahoma. In this capacity, I am the Miami Tribe's point of contact for all Section 106 issues. The Miami Tribe offers no objection to the above-referenced project at this time. However, as the project is within the ancestral homelands of the Miami Tribe and possibly near the location of an archaeological site, please continue to send any updated information regarding this project to me at dhunter@miamination.com. If any human remains or Native American cultural items falling under the Native American Graves Protection and Repatriation Act (NAGPRA) or archaeological evidence is discovered during any phase of this project, the Miami Tribe requests immediate consultation with the entity of jurisdiction for the location of discovery. In such a case, please contact me at 918-541-8966 or by email at dhunter@miamination.com.

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Comment Number	Commenter's Information	Topic 1	Comment
019a	Name: Colleen Bell Organization: The Osage Nation Affiliation: Native American Tribe/Organization Opinion: Neutral	Cultural/Historic	The Osage Nation has received notification and accompanying information for the proposed project listed as USACE, Savanna Army Depot Activity, Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Carroll County, Illinois. The Osage Nation Historic Preservation Office requests a copy of the cultural resource survey report for review and comment. In accordance with the National Historic Preservation Act, (NHPA) [54 U.S.C. § 300101 et seq.] 1966, undertakings subject to the review process are referred to in 54 U.S.C. § 302706 (a), which clarifies that historic properties may have religious and cultural significance to Indian tribes. Additionally, Section 106 of NHPA requires Federal agencies to consider the effects of their actions on historic properties (36 CFR Part 800) as does the National Environmental Policy Act (43 U.S.C. 4321 and 4331-35 and 40 CFR 1501.7(a) of 1969). The Osage Nation has a vital interest in protecting its historic and ancestral cultural resources. The Osage Nation anticipates reviewing and commenting on the survey report for the proposed USACE, Savanna Army Depot Activity, Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Carroll County, Illinois.
020a	Name: Melinda Appel Organization: Carroll County Board Affiliation: Local Government Opinion: Support	Socioeconomics	I am excited about using the area for economic growth. We need jobs and money to sustain the recreational part of the project. I'm excited for the tourism the recreation will attract. I support the project.
021a	Name: David Soldat Organization: Carroll County Board of Directors Affiliation: Local Government Opinion: Neutral	Hazardous Materials/Waste	Is there an issue of polluted ground water due to buried hazardous materials causing cancer?
022a	Name: Sara Renkes Affiliation: Private Citizen Opinion: Support	General Support	I just wanted to state my support for the LRA's Economic Development Plan, and would like to have the Army support in helping them facilitate that plan.
022b	Name: Sara Renkes Affiliation: Private Citizen Opinion: Support	Utilities/Infrastructure	The second comment I would like to make is if any extra funding could be obtained for the infrastructure to that area.
023a	Name: Julie Bickelhaupt Organization: Carroll County Board Affiliation: Local Government Opinion: Support	Socioeconomics	I think the biggest thing I'm seeing from being here, talking with the LRA and the -- the Port Authority is, I would like to see some economic growth for the area as well, you know, for the towns that surround it, but also for the county or counties potentially. That would be a very good thing for our area.
023b	Name: Julie Bickelhaupt Organization: Carroll County Board Affiliation: Local Government Opinion: Support	Socioeconomics	And that space, it would be wonderful if we could use it for something that could create economic growth. So that's pretty much what I feel, and I would like to see the most out of it. I'm sure there's some other options that could come along with it, but, you know, see that it benefits and provides stability through the area.
024a	Name: Erica Schau Affiliation: Private Citizen Opinion: Oppose	Utilities/Infrastructure	My first concern is the condition of Army Depot Road itself. Right now there is a lot of traffic with the grain bins back there. So, you know, spring, fall, all throughout the year, every day there's lots of trucks and that road is horrendous. And the patchwork just does not -- it does not work. It doesn't last. It may last a month or two and then it just crumbles.
024b	Name: Erica Schau Affiliation: Private Citizen Opinion: Oppose	Aesthetics/Visual	My second is, with the -- all the dredging that would go on with putting barges back there, the environmental impact and the impact that it has. There's -- there's several people that live right along the Mississippi River, like in the backwaters right back there. So there's a -- I mean it's really -- it's just so quiet and peaceful and I think it would be detrimental to our environment.
025a	Name: Elizabeth Grissinger Affiliation: Private Citizen Opinion: Support	Water	And my comment is with all the flooding that has happened all of these many, many years with Apple River and of course the Mississippi overflows and then Apple River overflows. But I see potential where the Commander's Lake could be dredged out deeper. And that would allow for overflow, which in turn would help the residents along the Army Depot Road that currently own property, the farmer, and the other resident that lives there, possibly would have less flooding in the future.
026a	Name: Ronald H. Smith Organization: LRA Board Affiliation: Business/Commercial Organization Opinion: Support	General Support	I live in Jo Daviess County, Galena, Illinois. I'm on the LRA Board. I've been on it for many years, and so I've been involved in a lot of projects down there like this one here now. And I'm definitely in favor. I'm glad now that we're looking at these parcels and being able to get those and develop them. We did a study on that Parcel 20, this is the -- back in June of 2023. And it spells out here by each area what it has and everything.
026b	Name: Ronald H. Smith Organization: LRA Board Affiliation: Business/Commercial Organization Opinion: Support	General Support	And it all turned out real positive release because years ago, you know, we used to have the riverfront and then we didn't -- we didn't get that or we lost that because they were going to build a prison there. So fish and wildlife had land internally, so they -- we had a trade and they took over the riverfront.
026c	Name: Ronald H. Smith Organization: LRA Board Affiliation: Business/Commercial Organization Opinion: Support	General Support	And then the LRA got that property there and that's where the prison was supposed to go, but then it got built down -- down below. I think so. But definitely we got a good board and the people working on some of these things that were economic development and with the opportunity at the railroad and the water there yet, you got to get access to that. Because when you can ship grain by bulk barges, it's more -- well, they say it's edible than by some of the trucks. I never knew that before. Yeah. So really that's all I have to say. We got a good organization. It's good people working. Now with the Port Authority working with us too, that's good that that's going forward.
027a	Name: Julie Bickelhaupt Organization: Carroll County Board Affiliation: Local Government Opinion: Support	Socioeconomics	Economic Development
028a	Name: Sara Renkes Organization: Carroll County Engineer Affiliation: Local Government Opinion: Support	Utilities/Infrastructure	I attended the meeting last night in Savanna as a citizen of Carroll County, but due to the comment made during the open forum regarding the Army Depot Road, I wanted to respond in my role as Carroll County Engineer as well. The County has jurisdiction of Army Depot Road from IL 84 to Main Avenue: https://maps.app.goo.gl/HyYVnTHvHDisuDCm7 The current road condition is quickly deteriorating due to use and age. The biggest issues are the limited width of the road and rutting that has occurred along the outside wheel tracks. Our maintenance crew has been placing shoulder rock and cold patch to band-aid the problem while I have been simultaneously applying for federal funding. We worked with Blackhawk Hills to receive a RISE Planning grant, which produced the following estimates for the road and bridge work: Please see the attached. I also worked with Blackhawk Hills to apply for a RISE Implementation grant for the bridge. We are still waiting for confirmation if this grant has been accepted.
028b	Name: Sara Renkes Organization: Carroll County Engineer Affiliation: Local Government Opinion: Support	Utilities/Infrastructure	I wanted to write this comment to show that the Carroll County Highway Department is making efforts to upgrade this corridor and ask for any assistance that could be given for funding this project. Whether that is suggestions on funding opportunities, letters of support to attach to any applications, or assistance in writing applications, really anything would be greatly appreciated.
028c	Name: Sara Renkes Organization: Carroll County Engineer Affiliation: Local Government Opinion: Support	Utilities/Infrastructure	I appreciate the Army taking the time to have the open meeting and look forward to speaking and hopefully working with you in the future.
029a	Name: Diane Gallagher Organization: Northwest Illinois Economic Development Board Blackhawk Hills Regional Council Jo Daviess Board District 1 Affiliation: Business/Commercial Organization Opinion: Support	Socioeconomics	Thank you for the opportunity for the public and Jo Daviess County Board members to review and comment on the transfer of LRA Parcel 20's 132 acres*. In 2016 when the US Fish and Wildlife Service officially withdrew its interest in this parcel, there was great excitement that the local economy could be boosted with opportunities for use by residents and visitors. The LRA has been cognizant of environmental concerns while researching responsible and practical uses that will bring greater value and interest to Parcel 20. * https://www.ird.usace.army.mil/Submit-Article/CS/Programs/Article/3901394/base-realignment-and-closure-brac/

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029b	Name: Diane Gallagher Organization: Northwest Illinois Economic Development Board Blackhawk Hills Regional Council Jo Daviess Board District 1 Affiliation: Business/Commercial Organization Opinion: Support	Socioeconomics	The reuse for commercial/economic development alternatives presented by LRA will answer the growing needs for our rural communities in Illinois. Although there is importance of recreation in attracting a workforce, it does not outweigh the need for job creation and improved economic growth outlook.
029c	Name: Diane Gallagher Organization: Northwest Illinois Economic Development Board Blackhawk Hills Regional Council Jo Daviess Board District 1 Affiliation: Business/Commercial Organization Opinion: Support	Socioeconomics	The declining population of our area's workforce must be faced with assertive actions to improve job opportunities and reduced tax burdens. Local boards, councils and community groups are eager to see growth stimulated. I just hope this long wait is not going to be a "too late" scenario for those dedicated to improving our northwestern part of Illinois.
029d	Name: Diane Gallagher Organization: Northwest Illinois Economic Development Board Blackhawk Hills Regional Council Jo Daviess Board District 1 Affiliation: Business/Commercial Organization Opinion: Support	General Support	Your approval of the transfer and reuse of Parcel 20 to the Jo-Carroll Depot Local Redevelopment Authority is requested.
030a	Name: John Schultz Organization: Jo Daviess County Board Affiliation: Local Government Opinion: Support	Other	I have been a citizen of Jo Daviess County for 76 years. My father worked at the SAD in the 1940's before entering the army Air Force to fight in WW2. My wife worked as an engineer for USADACS during the 80s and 90s before the base closed. I have served in Township and County Government for much of the last 40 years. I am currently Finance, Tax and Budget Chair for the JoDaviess County Board.
030b	Name: John Schultz Organization: Jo Daviess County Board Affiliation: Local Government Opinion: Support	Socioeconomics	Since the closure of The Savanna Army Depot it has represented 13,000 acres of untapped resources for development and reuse. The release of LRA Parcel for development is a crucial small step of realizing some of that potential. It represents about 1% of the property. Any environmental impact created by the usage of this property pales in comparison to its possible positive impact on Carroll and JoDaviess Counties.
030c	Name: John Schultz Organization: Jo Daviess County Board Affiliation: Local Government Opinion: Support	General Support	Thank you for this opportunity to express my support for the release and reuse of LRA Parcel 20.
031a	Name: Susan Jacobs Organization: Carroll County Board Affiliation: Local Government Opinion: Support	Socioeconomics	My thoughts on Parcel 20 is thank you for bringing this forward for review. I'm hoping this gets resolved at the correct levels for moving forward on this for Carroll County. I believe there is enough interest in the County for the economic development of this land.
032a	Name: Val Gunnarsson Organization: City of Savanna Affiliation: Elected Official Opinion: Support	Other	I am the mayor of the City of Savanna, Illinois and I thank you and all those involved in the January 16 scoping meeting held at our local high school building on the subject of the LRA's proposal for Parcel 20 at the former Savanna Army Depot. The meeting, including the public comments, the conversations I had with officials involved in the EIS process, conversations I had with officials of the Jo-Carroll LRA, and the written and displayed materials presented at the meeting were all very helpful.
032b	Name: Val Gunnarsson Organization: City of Savanna Affiliation: Elected Official Opinion: Support	Other	Aldermen from the Savanna City Council were present with me as were public members of our city economic development committees (that is, our Tax Increment Finance/Business Development Committee and our Riverfront Development Board).
032c	Name: Val Gunnarsson Organization: City of Savanna Affiliation: Elected Official Opinion: Support	Socioeconomics	We at the City of Savanna agree that the LRA's proposal for commercial use of Parcel 20 is best for the overall economic development of our local area. It would help us in Savanna in two ways: 1) it would attract appropriate and healthy commercial and industrial use to the former Savanna Army Depot which is close enough to our downtown to help us recover from the economic effects of the base closure;
032d	Name: Val Gunnarsson Organization: City of Savanna Affiliation: Elected Official Opinion: Support	Land Use	and 2) it would steer such industrial uses away from our riverfront, which we are seeking to protect and enhance for public recreational enjoyment. We have created a Riverfront Development Board dedicated to reducing the industrial use of our riverfront in favor of such public recreational use. The LRA's proposal fits right in with our plans and will be excellent for our local economic development.
032e	Name: Val Gunnarsson Organization: City of Savanna Affiliation: Elected Official Opinion: Support	Other	If there are questions you or others involved may have for me or our other city officials, please send them to me at [email redacted for privacy] anytime. Or call me on my cell at [number redacted for privacy].
033a	Name: Ronald H. Smith Organization: LRA Board Affiliation: Business/Commercial Organization Opinion: Support	Socioeconomics	I want the Army to perform the EIS for the full Commercial/Economic Development in line with the LRA Board's preferred option for Parcel 20 Reuse. The LRA has current opportunity to implement this type of use! I currently am a LRA Board Director representing Jo Daviess County for many Years. I also want to thank the Army for their many years of service and cooperation with other LRA Projects!
034a	Name: Joanna Davies Organization: Private Citizen Affiliation: Private Citizen Opinion: Support	Socioeconomics	I am a middle and high school social worker in Carroll County. While I see many strengths and assets in my community, I also, through my work with students and families, see the many struggles they face. Every day I hear and see how the loss of industry has negatively impacted them. Over the years and through generations, the closing of the Army Depot, the loss of jobs at the railroad, the downsizing of the prison, and the closure of restaurants and shopping establishments have left a void in local opportunities available to our communities.
034b	Name: Joanna Davies Organization: Private Citizen Affiliation: Private Citizen Opinion: Support	Socioeconomics	This lack of opportunity prevents students from finding jobs and gaining valuable work experience; they lack exposure to careers outside of factory work, the prison, and farming; and in the end many people who are looking for more than these options leave our communities seeking employment and a life elsewhere. For many of the students with whom I work, I see non-intact families with parents in prison or simply absent from their children's lives. I see parents addicted to drugs and alcohol or grandparents with extensive health issues raising grandchildren. I see people suffering from undiagnosed and untreated mental health issues. I see all of the trauma that these situations cause, which in turn lead to students who cannot imagine a life beyond the one they are experiencing. And the cycle continues.
034c	Name: Joanna Davies Organization: Private Citizen Affiliation: Private Citizen Opinion: Support	Socioeconomics	Looking at the bigger picture, the lack of development in our area makes it difficult to recruit school faculty and staff who do not have familial ties to the area and who will commit to working here for more than a couple of years. There is high turnover in our schools. These vacancies and few to no applications for job openings leave the school filling positions with retirees who, according to the terms of their retirement, cannot work a full school year, which leaves students being taught by substitutes in their absence. That lack of stability in our educators has a negative impact on the kids in terms of their academic success, and more importantly, in terms of their ability to create positive bonds with a stable adult. Research shows that having a consistent, supportive adult in one's life is the antidote to trauma.

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034d	Name: Joanna Davies Organization: Private Citizen Affiliation: Private Citizen Opinion: Support	Socioeconomics	Long story short, there is no silver bullet that will solve all of these problems. However, an increase in economic development in our community will lead to more positive outcomes, in every domain of their lives, for the students and families who live here.
035a	Name: LaDon Trost Organization: Jo Daviess County Board Affiliation: Local Government Opinion: Support	Proposed Action/Alternatives	Thank you for the opportunity for the public and Jo Daviess County Board members to review and comment on the transfer of LRA Parcel 20's 132 acres. In 2016, when the US Fish and Wildlife Service Officially withdrew its interest in this parcel, there was great excitement that the local economy could be boosted with opportunities for use by residents and visitors. The LRA has been cognizant of environmental concerns while researching responsible and practical uses that will bring greater value and interest to Parcel 20.
035b	Name: LaDon Trost Organization: Jo Daviess County Board Affiliation: Local Government Opinion: Support	Socioeconomics	The reuse for commercial/economic development alternatives presented by LRA will answer the growing needs for our rural communities in Illinois. Although there is importance of recreation in attracting a workforce, it does not outweigh the need for job creation and improved economic growth outlook.
035c	Name: LaDon Trost Organization: Jo Daviess County Board Affiliation: Local Government Opinion: Support	Socioeconomics	The declining population of the area's workforce must be faced with assertive actions to improve job opportunities and reduced tax burdens. Local boards, councils and community groups are eager to see growth stimulated. We hope this will be expedited for those dedicated to improving our northwestern part of Illinois.
035d	Name: LaDon Trost Organization: Jo Daviess County Board Affiliation: Local Government Opinion: Support	General Support	Your approval of the transfer and reuse of Parcel 20 to the Jo-Carroll Depot Local Redevelopment Authority is requested by the Jo Daviess County Board. Thank you for your consideration of our request.
036a	Name: Christopher Yacu Affiliation: Private Citizen Opinion: Oppose	General Opposition	Please consider this email my formal objection and disapproval of the LRA trunking the Brickhouse Slough into a barge staging area. As lifetime locals this would be detrimental to the area.
037a	Name: Will Morlock Affiliation: Private Citizen Opinion: Oppose	General Opposition	I am writing this email today to strongly oppose the LRA Parcel 20 reuse plan for allowing barges to tie up and wait to be loaded or unloaded from the silos in the slough.
037b	Name: Will Morlock Affiliation: Private Citizen Opinion: Oppose	Biological	This proposal would greatly affect the amazing fishing and wildlife area and disturb local residents. As someone who grew up coming to this area to fish and hunt, I don't want to see it ruined over a compromise plan. The Apple River project was strongly opposed for similar reason and this proposal would do much the same damage. Please do not allow this beautiful natural area to be used for a barge facility. Thank you for your consideration.
038a	Name: Brian Hughes Affiliation: Private Citizen Opinion: Oppose	General Opposition	Don't let them do it.
039a	Name: Thomas Miller Affiliation: Private Citizen Opinion: Oppose	General Opposition	Extending the loading and unloading dock will create the potential for barge staging issues that will impact local wildlife, tourism and locals. Please stop the approval of this easement.
040a	Name: Brandon Yacu Affiliation: Private Citizen Opinion: Oppose	Biological	I am writing to communicate my displeasure in the plans to turn the Brickhouse Slough into a barge staging/loading area. I believe this will be detrimental to the wildlife and well-being of residents in the area who are frequently utilizing this resource.
041a	Name: Ashley Dalton Affiliation: Private Citizen Opinion: Oppose	Land Use	I hope you're doing well. I'm reaching out to express my concerns about the proposed barge encampment at the mouth of the Apple River, near the Savanna Army Depot. As a local property owner, I believe this development would seriously impact the area's recreational value, which has been a peaceful retreat for many years.
041b	Name: Ashley Dalton Affiliation: Private Citizen Opinion: Oppose	Land Use	Our family has long enjoyed the Apple River's natural beauty. The peaceful environment is a key reason so many people visit. The proposed encampment would disrupt this, diminishing the enjoyment of activities like fishing, boating, and simply being outdoors. For us, this place holds significant personal value, and any industrial development would change it forever.
041c	Name: Ashley Dalton Affiliation: Private Citizen Opinion: Oppose	General Opposition	I urge you to reconsider this plan and explore alternatives that protect the river's charm for future generations.
041d	Name: Ashley Dalton Affiliation: Private Citizen Opinion: Oppose	Other	Thank you for your time and consideration. I'd appreciate the opportunity to discuss this further.
042a	Name: Chris Falk Affiliation: Private Citizen Opinion: Oppose	Coordination/Communication	Regarding the initial proposal for the Commanders Pond Full . . . it was a total joke and waste of time. It did not involve any EPA, Fish and Wildlife, nor the Army Corp of Engineers. Each one of these organizations had numerous reasons for shooting down this proposal which the local LRA spent to have a very expensive, yet useless Final Reuse Plan for Parcel 20 composed by Balcom Environmental Services.
042b	Name: Chris Falk Affiliation: Private Citizen Opinion: Oppose	Hazardous Materials/Waste	As documented in the Final Use Plan for Parcel 20, the area is full of PFASs, or more commonly known as "Forever Chemicals" which are known to cause health problems with both humans and animals and contain components of which break down very slowly over time and sometimes not at all. Yes, they say they have cleaned up the commander's pond, however on page 14 of the Final Reuse Plan for Parcel 20 composed by Balcom Environmental Services, they note that "There are two Confirmed PFAS contamination sites that lie immediately upgradient from Parcel 20 and have stormwater outfalls that discharge directly into the Commander's pond". So with PFAS's pouring into the exact proposed site for their loading and unloading terminal, this is obviously not a realistic or feasible project.
042c	Name: Chris Falk Affiliation: Private Citizen Opinion: Oppose	Proposed Action/Alternatives	The answer to the previous question is obvious . . . The LRA knew their Commander's Pond Full proposal would be shot down by the Fish and Wildlife Service (and other agencies). So, the only angle for the LRA was a bait and switch tactic saying, "You won't let us build over here, but how about over there?" It is well known that the LRA is asking for a 50' easement from the current silos to Brickhouse Slough. However, with the 50' easement proposal, the effects on Brickhouse Slough are just as bad as the Commanders Pond Full proposal. For this reason, I continue to also explain why even the 50' easement proposal is a project that should not be considered. So, reasons against the compromise to a 50' easement are numerous
042d	Name: Chris Falk Affiliation: Private Citizen Opinion: Oppose	Socioeconomics	1. Waste of Government grant spending. This proposed barge loading facility would survive only by stealing customers of other barge loading facilities. The proposed "Organic Growth" to entice new potential customers to ship by barge is just a crazy dream and if you talk to the current barge loading facilities, they are struggling to stay busy at times. Products that can benefit from shipping via barge, are already shipping via barge. All the crazy and inflated Employment jobs, per person, per year are based on loading and unloading these make-believe prospective barge freight products (windmill turbine blades, plastic recycling, and ethanol). None of these could be loaded or unloaded via a 50' easement from the grain elevator.
042e	Name: Chris Falk Affiliation: Private Citizen Opinion: Oppose	Socioeconomics	2. If this were anything other than a government grant fleecing it would never be built because the ROI isn't there. The needed spending would be well into seven figures to build this facility, and the paycheck will be literally in pennies per year. Barge loading facilities deal with products that are very low margin and require large volumes to potentially be profitable. Because margins are slim, barge loading facilities operate with the fewest employees as possible. The potential "jobs generated" numbers on the Final Reuse Plan for parcel 20, are based on potential numbers that include products that currently do not ship via barge for a reason. These numbers are more of a wish list than actual potential job creation.
042f	Name: Chris Falk Affiliation: Private Citizen Opinion: Oppose	Navigation	3. Brickhouse Slough is unique and a heavily used recreational area for Pool 13. It contains one of the only sloughs that parallels the main channel and allows for water skiing and tubing for kids without dangerous barge traffic. Brickhouse Slough was created when the Army Corps of Engineers decided that the main channel should go west of Apple River Island, and they created wing dams to steer the river west instead of down Brickhouse Slough which used to be the main channel. Removal of any of these wing dams to allow barge access into the north end of Brickhouse Slough would have major environmental impacts and could change the flow of the river. Also, on the bottom of Brickhouse Slough is what they call a closing dam. This dam closes the slough, but more importantly holds back water that allows the slough to be navigated. Removing the closing dam to allow barges to enter from the south end of Brickhouse Slough would also be an environmental disaster lowering water levels in the slough beyond what the expensive dredging could compensate for.
042g	Name: Chris Falk Affiliation: Private Citizen Opinion: Oppose	Socioeconomics	4. Minimal Job Creation for Maximum Negative Environmental Effects. A typical barge (loading only, no crazy windmill blades, etc.) generally employs about 6 – 10 employees. So, the creation of mere 6- 10 jobs is no where close to outweighing the negative environmental impact on Brickhouse Slough. Creating this barge loading only port will face a guaranteed uphill battle against local recreational users of Brickhouse Slough, as well as the other agencies discussed (Fish and Wildlife, Army Corp of Engineers, Illinois Department of Natural Resources, Illinois EPA, Federal EPA and others).

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042h	Name: Chris Falk Affiliation: Private Citizen Opinion: Oppose	Socioeconomics	In conclusion here I just want to say that I do not envy the position the LRA Board is in trying to accomplish a very difficult task of turning the former Savanna Army Depot into local jobs. While I support many of their efforts for economic development at the former Depot, there are always several different angles from many different perspectives to consider and work through to accomplish their goal. Put plainly, they have a very difficult job, and normally I support their efforts, however turning Brickhouse Slough into a barge loading terminal is one the projects I just can't get behind.
043a	Name: Garrett Hartig Affiliation: Private Citizen Opinion: Oppose	Land Use	Hello, I would like to express my disapproval of this project. I just recently purchased a home on the Brickhouse Slough and enjoy the quiet and peaceful atmosphere along with the fishing and other wildlife. Many people use this slough as a recreational area and it could cause very dangerous situations if they allow barge traffic and also disturb the wildlife in this slough.
043b	Name: Garrett Hartig Affiliation: Private Citizen Opinion: Oppose	Cultural/Historic	And I really hope that the ancient Indian grounds don't get disturbed with this project.
043c	Name: Garrett Hartig Affiliation: Private Citizen Opinion: Oppose	General Opposition	If we as land owners had a vote every single one of us would vote NO! And I hope Fish and Wildlife along with the Army Corps would also turn this project down.
044a	Name: Max Morlock Affiliation: Private Citizen Opinion: Oppose	General Opposition	Good morning, I disapprove of the proposed project that calls for a 50ft Easement into the mississippi river. You know the one I'm speaking of, please don't be all cheeky with it :)
045a	Name: Matt Morlock Affiliation: Private Citizen Opinion: Oppose	Aesthetics/Visual	Have a great day! I am writing to express my strong concerns regarding the proposed plan to build a barge encampment at the mouth of the Apple River, near the Savanna Army Depot. As a property owner in the area and someone who enjoys the natural beauty of this region, I believe this project would significantly harm the recreational value of the area, which has long been a retreat for many.
045b	Name: Matt Morlock Affiliation: Private Citizen Opinion: Oppose	Aesthetics/Visual	Our family has enjoyed hunting, fishing, and spending time at our cabin near the river for generations. The Apple River and its surrounding landscape are a vital part of what makes this area so special. The peaceful, scenic environment is a key reason so many people, including myself, come here to relax and enjoy nature. The proposed barge encampment, however, would disrupt the tranquility and beauty of the area, diminishing its appeal to visitors and residents alike.
045c	Name: Matt Morlock Affiliation: Private Citizen Opinion: Oppose	Land Use	I am writing to express my strong concerns regarding the proposed plan to build a barge encampment at the mouth of the Apple River, near the Savanna Army Depot. As a property owner in the area and someone who enjoys the natural beauty of this region, I believe this project would significantly harm the recreational value of the area, which has long been a retreat for many.
045d	Name: Matt Morlock Affiliation: Private Citizen Opinion: Oppose	Land Use	With the construction of the encampment, it's likely that recreational activities such as fishing, boating, and simply enjoying the river would be negatively impacted. The area could become less accessible and less enjoyable for those who come to experience its natural beauty. For many of us, this place is not just a property—it's a cherished part of our lives, and I fear that any industrial development would irreparably change its character.
045e	Name: Matt Morlock Affiliation: Private Citizen Opinion: Oppose	General Opposition	I kindly urge you to reconsider this plan and explore alternatives that will allow the Apple River to retain its charm and value as a recreational destination. It is important to preserve the special quality of this area for future generations to enjoy.
046a	Name: Randy Nyboer Affiliation: Private Citizen Opinion: Oppose	Proposed Action/Alternatives	Thank you for your time and consideration. Please do not proceed with this project in such a wonderful area.
046b	Name: Randy Nyboer Affiliation: Private Citizen Opinion: Oppose	Hazardous Materials/Waste	I found combining the Parcel 20 EIS Public Scoping Meeting with preview of the LRAs Final Reuse Plan for Parcel 20 a different but interesting approach than what has been presented at past scoping meeting. The Reuse Plan provided an insightful and expensive need and guidance for the remediation of Parcel 20.
046c	Name: Randy Nyboer Affiliation: Private Citizen Opinion: Oppose	Biological	My concerns within Parcel 20 center on the environmental remediation of Site 178 (Ordinance School Lake/Commanders Pond) and its western bank. The clean up of this area will be the driver to the Final Reuse Plan. The process and timetable for completing this hasn't been presented here. While the methodology for removing the contaminants is determined by the regulators, the placement of additional dredge spoil also needs to be addressed.
046d	Name: Randy Nyboer Affiliation: Private Citizen Opinion: Oppose	Biological	Because the remediation of the above site directly influences the implementation of the Reuse Plan for Parcel 20. It also directly influences the serious negative impacts to the biological resources, land use, and commercial navigation adjacent to the parcel. The proposed dredge cut will go beyond Parcel 20 and directly impact the FWS Refuge to gain access to the river. The construction, maintenance and use of a wharf, drydock and conveyor/pipelines will also directly impact the Refuge.
046e	Name: Randy Nyboer Affiliation: Private Citizen Opinion: Oppose	Navigation	The fleeting of barges around Apple River Island also has the potential to impact the Refuge and riverine biological resources. The dredging of Brickhouse Slough will be an ongoing exercise where dredge spoil will need to be placed where? As well as harm rare biological resources.
046f	Name: Randy Nyboer Affiliation: Private Citizen Opinion: Oppose	Land Use	Finally, the overall commercial navigation on the river is dependent on the wing dams and structure the COE designed to maintain the main channel. The removal or altering of these structures, as proposed in the reuse plan, will negatively influence the navigation channel. FWS and the COE have previously indicated these issues to earlier proponents of barge developments. What has changed?
047a	Name: Vivek Mistry Affiliation: Private Citizen Opinion: Oppose	General Opposition	One last comment. The recreational attributes of the reuse plan are probably just a nice try to appease the recreationalists, but maintaining a trail within an active floodplain and developing a picnic area on top of a landfill are not the kindest proposals to present to outdoor users.
047b	Name: Vivek Mistry Affiliation: Private Citizen Opinion: Oppose	Biological	I am writing to express my opposition to the Environmental Impact Statement (EIS) for the Disposal and Reuse of LRA Parcel 20 at the Savanna Army Depot Activity, located in Carroll and Jo Daviess Counties, Illinois.
048a	Name: Kim Falk Affiliation: Private Citizen Opinion: Oppose	General Opposition	This project threatens the ecosystem of the Mississippi River, which is home to many of my favorite spots, and could result in the irreversible destruction of vital habitats. The environmental impact would be devastating, and I strongly urge reconsideration of this proposal. Thank you for your time and attention to this important issue.
048b	Name: Kim Falk Affiliation: Private Citizen Opinion: Oppose	Biological	My husband and I attended the informational meeting on January 16, 2025 at the Savanna High School regarding the potential installation of a barge terminal utilizing land at the former Savanna Army Depot and along/in the Mississippi River along a section referred to as "Brick House Slough". We own a secondary property a short distance upstream from the Commanders Pond on the Apple River. In addition, I was born and raised in Savanna, Illinois. My family spent countless hours boating, camping, and enjoying the Mississippi River in the general Savanna area (including this section of the river). I would like to address some concerns I have regarding this potential development.
048c	Name: Kim Falk Affiliation: Private Citizen Opinion: Oppose	Biological	"Habitat - As a child (and even most of my adult life), it was a very rare occasion to see bald eagles, sandhill cranes, swans, pelicans, etc. The river was unhealthy for such birds due to pesticides and perhaps even the contaminants spilled/seeped into our river system from ammunitions and PFAS. Now, it is clear that our area's river system is indeed much healthier, as we have seen the return and repopulation of these birds. I am incredibly concerned that bringing such a development to this area would harm these and other wildlife populations. As we know, to bring this project to fruition, a large amount of dredging would be required. Dredging causes entrainment, habitat degradation, noise, and increased sedimentation. Dredging could also "stir up" and release harmful contaminants, such as explosives and PFAS, that have long since been buried and are currently undisturbed. This would impact not just the habitat and the river's health but could ultimately contaminate drinking water of residents and communities in the area. Barge traffic in and out of this area would further increase this contamination and sedimentation with the constant moving of the barges by (assumed) tug systems, as they draw water from the river and sediment from the river bed when operating.
048d	Name: Kim Falk Affiliation: Private Citizen Opinion: Oppose	Hazardous Materials/Waste	"Endangered species - This area is home to many native species that are also considered endangered or are on "watch lists". I assume there will be an in-depth study to rule out disturbing the habita/environment of any such species that would further inhibit their population.
048e	Name: Kim Falk Affiliation: Private Citizen Opinion: Oppose	Noise	"Contaminates - We know there has been extensive "cleaning up" of the soil, Commanders Pond, and other items of concern at the SAD. However, we also are aware that there is much more to do. Unfortunately, there are some contaminants within the SAD confines and beyond that will never be able to be "cleaned up". In a lengthy document found online regarding this potential development, there is information regarding PFAS being found and draining into the Commander's Pond. Do you know if there are any plans to test the area's drinking water and/or water tables to rule out the possibility of such contaminants being in this water? I am concerned that dredging and constant barge traffic in and around this area of contamination will stir these contaminants up into the environment and water system.
048f	Name: Kim Falk Affiliation: Private Citizen Opinion: Oppose	Aesthetics/Visual	"Noise - While noise can have a detrimental effect of wildlife in the area, I also have a concern for those of us that have homes in this area. We enjoy the peace and quiet that this area provides. Noise is part of the game with grain elevators, trucks, and barges. This noise would impact our quality of life in this area. Studies have also shown that noise pollution can have detrimental health effects on humans and organisms.
048g	Name: Kim Falk Affiliation: Private Citizen Opinion: Oppose	General Opposition	"Aesthetically - This river area has been relatively untouched by industry. It's part of why so many people are drawn to enjoy this section of the river. Having a barge terminal here would negatively impact the beautiful scenery of this area. Barges tied up along the shorelines certainly isn't my idea of a relaxing, enjoyable day on the river. I would assume that many other boaters, fishermen/women, and campers feel the same way. Many businesses in our area rely on summer boat traffic to help sustain their business. Would this impact their business success? Personally, I would be very upset to have this basically "in my backyard". We would be finding our way through barges to get into Brickhouse Slough AND to get to the river's main channel.
048h	Name: Kim Falk Affiliation: Private Citizen Opinion: Oppose	General Opposition	I understand that this project could potentially impact our economy in our area by providing some jobs and other sources of income. I want nothing more than to find some employment opportunities for our communities. However, we must ask ourselves ... "At what cost?". How much damage to our environment, habitats, living conditions, personal enjoyment, and undisturbed river section is too much? How much would outweigh the possible positives that could come from it? Personally, I am someone who has always been concerned about pollution and the environment. I feel that the gains would not outweigh the damages that this would bring. Therefore, I am not in favor of seeing this project come to the area in the future.

Scoping Comments for the SVADA LRA Parcel 20 EIS

Comment Number	Commenter's Information	Topic 1	Comment
049a	Name: Alissa King Affiliation: Private Citizen Opinion: Oppose	General Opposition	I opposed the Environmental Impact Statement (EIS) for Disposal and Reuse of LRA Parcel 20 at Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois.
050a	Name: Matt Collins Affiliation: Private Citizen Opinion: Oppose	General Opposition	I opposed the Environmental Impact Statement (EIS) for Disposal and Reuse of LRA Parcel 20 at Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois.
051a	Name: Danny Argomaniz Affiliation: Private Citizen Opinion: Oppose	General Opposition	I opposed the Environmental Impact Statement (EIS) for Disposal and Reuse of LRA Parcel 20 at Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois.
052a	Name: Lauren Chambers Affiliation: Private Citizen Opinion: Oppose	General Opposition	I opposed the Environmental Impact Statement (EIS) for Disposal and Reuse of LRA Parcel 20 at Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois.
053a	Name: Tori Wilcox Affiliation: Private Citizen Opinion: Oppose	General Opposition	I oppose the Environmental Impact Statement (EIS) for Disposal and Reuse of LRA Parcel 20 at Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois.
054a	Name: Lindsey Guliksen Affiliation: Private Citizen Opinion: Oppose	General Opposition	I opposed the Environmental Impact Statement (EIS) for Disposal and Reuse of LRA Parcel 20 at Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois.
055a	Name: Nicholas Walkow Affiliation: Private Citizen Opinion: Oppose	General Opposition	I opposed the Environmental Impact Statement (EIS) for Disposal and Reuse of LRA Parcel 20 at Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois.
056a	Name: Joe Cochrane Affiliation: Private Citizen Opinion: Oppose	General Opposition	I opposed the Environmental Impact Statement (EIS) for Disposal and Reuse of LRA Parcel 20 at Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois.
057a	Name: Andrew Fruci Affiliation: Private Citizen Opinion: Oppose	General Opposition	I opposed the Environmental Impact Statement (EIS) for Disposal and Reuse of LRA Parcel 20 at Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois.
058a	Name: Jocelyn Bernal Affiliation: Private Citizen Opinion: Oppose	General Opposition	I opposed the Environmental Impact Statement (EIS) for Disposal and Reuse of LRA Parcel 20 at Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois.
059a	Name: Trevor Washington Affiliation: Private Citizen Opinion: Oppose	General Opposition	I opposed the Environmental Impact Statement (EIS) for the Disposal and Reuse of LRA Parcel 20 at Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois.
060a	Name: Glenn Obrero Affiliation: Private Citizen Opinion: Oppose	General Opposition	I opposed the Environmental Impact Statement (EIS) for Disposal and Reuse of LRA Parcel 20 at Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois.
061a	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Other	As a follow-up to our agency meeting on January 16, 2025, regarding the transfer of Parcel 20 from Army to Jo-Carroll Depot Local Redevelopment Authority (LRA), I have summarized below the primary concerns that U.S. Fish and Wildlife Service' Upper Mississippi River National Wildlife and Fish Refuge (Refuge) has expressed to Army.
061b	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Land Use	1. The development of facilities on lands owned by the Refuge is in violation of numerous federal laws including the National Wildlife Refuge Improvement Act of 1997.
061c	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Biological	2. There is potential for damage to natural resources including the federally endangered Higgins eye pearlymussel (previously found to be present along the shoreline) due to development within Brickhouse Slough.
061d	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Navigation	3. The proposed access plan for towboats/barges entering Brickhouse Slough identified in LRA's Final Reuse Plan is different from the access plan identified by Executive Director Mara Roche during the agency meeting. The Final Reuse Plan (page 79) identifies access will be from the south, whereas Mara identified access will be from the north. The correct access path into Brickhouse Slough needs to be identified as it determines how much material needs to be excavated and its impacts to bordering areas.
061e	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Navigation	4.The LRA's Final Reuse Plan identifies 1,237,450 cubic yards of material to be excavated that includes 304,808 cubic yards of contaminated material. These estimates are based on towboat/barge access into Brickhouse Slough from the south according to the Final Reuse Plan and will need to be revised to correlate with access into the slough from the north.
061f	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Hazardous Materials/Waste	5. The removal of contaminated material within Commander's Pond could potentially contaminate Upper Mississippi River waters. A detailed material excavation/placement plan needs to be provided that identifies: how safety precautions will be taken for handling contaminated versus uncontaminated material; the location where contaminated and uncontaminated material will be placed; initial cost to implement an excavation/placement plan, and; an estimate of annual maintenance quantities/costs that will be required to maintain a 9-foot deep channel leading into and within Brickhouse Slough and Commander's Pond.
061g	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Navigation	6. An updated towboat/barge access plan is also important to determine the impact to wing dams and closing dams that border the project area. There are several wing dams located at the northwest entrance to Brickhouse Slough that would potentially have to be removed to allow towboat/barge access from the north. In addition, the closing dam within Brickhouse Slough will have to be removed. There is also an elongated wing dam that lies parallel along the west shoreline of Apple River Island. These wing dams and the closing dam are important for maintaining the 9-foot navigation channel, and removal may impact commercial navigation.
061h	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Navigation	7. Fleeting of barges on the west shoreline of Apple River Island is identified in the Final Reuse Plan and may encroach upon the river's main navigation channel. Wing dams are located along the Iowa side of the main channel adjacent the island, so towboats/barges must use the narrow Illinois side of the channel for navigation.
061i	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Other	Thank you for the opportunity to once again express these concerns. I'm looking forward to seeing how these and the many other concerns raised during the agency meeting will be addressed in the EIS process

Scoping Comments for the SVADA LRA Parcel 20 EIS

Comment Number	Commenter's Information	Topic 1	Comment
062a	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Proposed Action/Alternatives	<p>The U.S. Environmental Protection Agency is responding to the Department of the Army's December 20, 2024, Notice of Intent to prepare an environmental impact statement for the disposal and expected subsequent reuse of parcel 20 at Savanna Army Depot (SVAD). The USEPA has reviewed the Notice of Intent pursuant to the National Environmental Policy Act and Section 309 of the Clean Air Act. The CAA Section 309 rule is unique to EPA. It requires EPA to review and comment on the environmental impact of any proposed federal action subject to NEPA's environmental impact statement requirements and to make its comments public.</p> <p>The SVAD site is a 13,062-acre former DoA installation located on the eastern bank of the Mississippi River, nine miles north of Savanna, Illinois. Between 1917 and 1995, the DoA used the property for artillery weapons and ammunition testing, storage of ordnance, and the loading and renovating of shells and bombs. The 1995 Base Realignment and Closure (BRAC) Commission recommended closure of SVAD. A 1997 environmental impact statement evaluated the closure, and the SVAD was officially closed in 2000.¹ The forthcoming Draft EIS will supplement the 1997 EIS. The DoA has been conducting environmental remediation to clean up this surplus property in preparation for eventual property transfer.</p> <p>On January 17, 2018, the DoA published notice in the Federal Register indicating surplus property was available at SVAD for public benefit purposes and that the Jo Carroll Depot Local Redevelopment Authority (LRA) had been recognized by the Department of Defense as the LRA for this surplus property. The LRA performed an analysis (the Parcel 20 Reuse Plan) in support of reuse planning for LRA Parcel 20, which covers 132-acres, for DoA's use when preparing the NEPA scoping document.</p> <p>The 132-acre parcel is undeveloped land sharing a border with the Upper Mississippi River National Wildlife and Fish Refuge, the Apple River, and a tributary of the Mississippi River. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast. The railway right-of-way and a sewage treatment plant surrounded by the 132-acre parcel and owned by the DoA are not part of the parcel to be transferred.</p> <p>The LRA's finalized 2023 reuse plan presents three conceptual reuse alternatives for developing LRA Parcel 20, which focus on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development. Three conceptual alternatives for redevelopment of LRA Parcel 20 were identified in the scoping document as follows:</p> <p>Alternative 1 (Brickhouse Slough) – This alternative prioritizes fleet2 development of a dry bulk and liquid bulk wharf on the Brickhouse Slough and recreational use. Key port infrastructure includes a barge fleet2 area, an 800-foot dry and liquid bulk wharf, a floating dry dock, a wharf access road, a haul road, a liquid bulk pipeline, and a conveyor system.</p> <p>Alternative 2 (Commander's Pond Lite) – This alternative expands on Alternative 1 and adds a 600-foot lift-on/lift-off wharf to allow the handling of two 250-foot barges simultaneously to support expansion of specialty and breakbulk cargos and dry dock capacity. This concept would require approximately 18 acres of dredging within the Commander's Pond area to support access to Brickhouse Slough.</p> <p>Alternative 3 (Commander's Pond Full) – This alternative expands on Alternative 2 and adds additional port support to include an additional 350-foot lift-on/lift-off wharf to allow the handling of two 250-foot barges simultaneously, a repair fleet2 area, and the inclusion of an aquatic habitat restoration area. This concept would require approximately 42 acres of dredging within the Commander's Pond area with 26 acres to support cargo activities and the remaining 16 acres dedicated for aquatic habitat restoration. Alternative 3 is the LRA's preferred alternative as of November 27, 2023.</p> <p>To facilitate implementation, the LRA designed the alternatives as sequential phases. Alternative 1 could be implemented within a target 5-year completion window, while Alternatives 2 and 3 could follow, with both having 5-year-plus completion windows. The LRA's proposed reuse plan includes activities outside the boundary of LRA Parcel 20.3 Each of the LRA's reuse alternatives would require dredging.</p> <p>The timing for capital expenditures is not fully established and will depend in large part on market interest and development participation by private partners as well as regulatory and permit processes. To facilitate implementation, the alternatives are designed to phase into each other seamlessly and sequentially. For example, Alternative 1 could be initiated immediately with a target five-year completion window, while Alternatives 2 and 3 could follow in a five-year plus completion window.</p> <p>EPA provided detailed NEPA scoping comments dated February 2, 2024 and August 26, 2024 (see enclosed letters). Our comments in this letter recommend the forthcoming DEIS address our recommendations regarding the purpose and need/project alternatives, Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) sites, impacts to aquatic resources, sediment sampling/management, air resources and emission impacts, project design/staging, socioeconomic impacts and public involvement, climate effects, energy efficiency and environmental best practices, natural features, non-native invasive species, historic and cultural resources, and interagency coordination and permitting.</p> <p>Thank you for the opportunity to participate in project planning at the earliest stages. Please contact the lead NEPA Reviewer, Kathy Kowal, via email at kowal.kathleen@epa.gov if you have any questions regarding the contents of this letter as well as to arrange inter-agency meetings concerning this project. Electronic copies of future NEPA correspondence related to this project should be sent to RSNEPA@epa.gov.</p> <p>Footnotes:</p> <p>1 Approximately 5,350 acres have been transferred as of December, 2024. 2 Fleet2 would provide "parking areas" while cargo is being loaded/offloaded. 3 In the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island.</p>
062b	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Proposed Action/Alternatives	<p>1. PURPOSE AND NEED / PROJECT ALTERNATIVES</p> <p>A. The project website4 indicates the DoA is preparing an EIS to evaluate the environmental and socioeconomic effects of the disposal and reuse of the 132-acre parcel of land of SVAD. Under the proposed action, DoA would dispose of the parcel and transfer the parcel for reuse according to the LRA's finalized 2023 reuse plan. The forthcoming EIS analysis should include elimination criteria and clear explanations of why alternatives were dismissed.</p> <p>Recommendations for the DEIS:</p> <p>1. Analyze the No Action Alternative and all action alternatives which satisfy the purpose and need. For each alternative presented: a) Describe the potential action(s) that would be taken by the transferee. Consider all phases of a potential project when analyzing connected actions. b) Specify activities that would occur in-water versus out of water. c) Visually depict each alternative, including the proposed project footprint and project elements (e.g., staging areas).</p> <p>2. Identify any alternatives considered but dismissed from further consideration.5 Provide elimination criteria and clear explanations for their elimination.</p> <p>3. Analyze impacts to navigation along the Upper Mississippi River's main channel from barges fleet2 near Apple River Island.</p> <p>4. Identify LRA's previous studies and concerns identified by the LRA Environmental Committee.6 Discuss how previous plans and discussions with the Committee informed proposed alternatives to be analyzed in the DEIS.</p> <p>5. Explain traditional versus accelerated disposal options and how each option would affect the alternatives.</p> <p>Footnotes:</p> <p>4 www.irs.us/ace.army.mil/Submit-Article/CS/Programs/Article/3901394/ 5 Previous discussions to transfer parcel to U.S. Fish and Wildlife Service, transfer to USACE to manage dredged materials, etc. 6 For example, Savanna Army Depot Reuse Plan and Implementation Strategy dated December 1996.</p>
062c	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Hazardous Materials/Waste	<p>2. COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT (CERCLA) SITES</p> <p>A. LRA Parcel 20 includes several CERCLA sites which were previously investigated [e.g., Site 20 (Abandoned Landfill), Site 73 (Stables Landfill), Site 77 (1917-Era Powder Magazines), Site 130 (Vincent Road Septic System), Shop Area (Buildings 100 through 129 Sanitary and Stormwater Sewer lines and Outfalls to Site 178 and Site 178 (Ordnance School Lake, also known as Commander's Pond)7]. Because two sites still have incomplete actions related to their respective remedial action process, the DEIS should discuss each alternative in relation to these remaining actions. Based on information available to EPA, the current status of the CERCLA sites is as follows:</p> <p>Site 20 (Abandoned Landfill):</p> <p>According to the Final Record of Decision, Site 20 – Abandoned Landfill and Site 99 –Building 762, CF Plant Battery Shop and Leaching Pits, Savanna Army Depot Activity, Savanna, Illinois, dated June 2016 (Site 20 Record of Decision (ROD)), the selected remedy included landfill capping with hotspot removal, long-term groundwater monitoring, and land use controls (LUCs). Based on the Final Land Use Control Implementation Plan, Site 20 Abandoned Landfill, Savanna Army Depot Activity, Savanna, Illinois, dated October 2019 (Site 20 LUCIP), the institutional and engineering controls for Site 20 include:</p> <ul style="list-style-type: none"> - environmental covenants to prohibit residential use, access to groundwater, and intrusive activities (including agricultural use) at the site; - Illinois Environmental Protection Agency (Illinois EPA), DoA, and EPA review of LUC inspections and approval processes; - maintenance of a vegetated engineered landfill cap constructed with at least 2 feet of compacted clay and 6 inches of topsoil and turf reinforcement mat including the intended vegetative cover and the underlying soil such that erosion gullies and localized settlement do not occur; - use of site boundaries to limit site access: wetlands and the Apple River form the northeastern, eastern, and southern boundaries and a railroad right-of-way and fencing along the western boundary of the site; and, - signs and engineered cap delineation posts are installed along the boundary of the site. <p>Based on the Final Second Five-Year Review Report for Savanna Army Depot Activity Superfund Site, Savanna, Jo Daviess and Carroll Counties, Illinois, dated June 2020 (2nd FYR), the excavation, offsite disposal of soil, and installation of a vegetated engineered landfill cap have been completed. However, there are activities ongoing outside of the DEIS process, including that the UECA [Uniform Environmental Covenants Act] environmental covenants have not been executed. Groundwater monitoring is still ongoing.</p> <p>Site 73 (Stables Landfill):</p> <p>According to the Final Record of Decision, Site 73 – Stable Landfill and Site 178 –Ordnance School Lake, Savanna Army Depot Activity, Savanna, Illinois, dated August 2016 (Sites 73 & 178 ROD), the selected remedy for Site 73 includes "[R]emoval and disposal of bulk debris and drums as nonhazardous waste following appropriate characterization; excavation of soil containing COCs [contaminants of concern] at concentrations above the remediation goals for residential use; transportation of the excavated debris and soil to a RCRA [Resource Conservation and Recovery Act] Subtitle D permitted facility (assuming the soil is nonhazardous); and, restoration of the site, which may include restoration of disturbed wetlands."</p> <p>Based on the 2nd FYR, "Remedial action was completed in December 2018 and the completion report is in the final stages. Site meets requirements for unrestricted use."</p> <p>Site 178 (Ordnance School Lake also known as Commander's Pond):</p> <p>According to the Sites 73 & 178 ROD, the selected remedy for Site 178 includes "[E]xcavation of outfall surface soil and sediment along the western shoreline containing COCs at concentrations above recreational remediation goals; transportation of excavated material to a RCRA Subtitle D permitted facility for disposal (assuming the material is nonhazardous); site restoration, including regrading and/or bank stabilization; implementation of administrative LUCs (e.g., zoning laws) to maintain recreational or industrial/commercial use of the property; development of a Land Use Control Implementation Plan (LUCIP) to document strategies for implementing, maintaining, monitoring, and enforcing LUCs at the site; and, periodic monitoring of the LUCs conducted annually and as part of CERCLA 5-year reviews; in the event that the site changes land use designation, the 5-year review will be used as a mechanism to determine if the site conditions require a modification or amendment to the site controls."</p> <p>Based on the 2nd FYR, "[E]xcavation and offsite disposal was conducted in December 2018. LUC Implementation Plan (LUCIP) is under review. LUCs need to be implemented."</p> <p>Site 77 (1917-Era Powder Magazines) and Site 130 (Vincent Road Septic System):</p> <p>Sites 77 and 130 were initially evaluated and determined not to require further investigation or remediation.</p> <p>Footnote:</p> <p>7 "Ordnance School Lake," "Ordnance Lake," and "Commander's Pond" are the same body of water and are used interchangeably throughout this document. The usage is based upon the historical reference document.</p>

Scoping Comments for the SVADA LRA Parcel 20 EIS

Comment Number	Commenter's Information	Topic 1	Comment
062d	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Hazardous Materials/Waste	<p>Recommendations for the DEIS:</p> <ol style="list-style-type: none"> Given the status of the CERCLA sites above, EPA has identified the following considerations with regard to information contained in the scoping request and the Parcel 20 Reuse Plan: <ul style="list-style-type: none"> The Scoping Request and the Parcel 20 Reuse Plan did not discuss how LUCUs will be implemented and maintained under the conceptual redevelopment alternatives. As such, it is unclear if any of the three proposed reuse alternatives presented in the Parcel 20 Reuse Plan would impact the implementation of required LUCUs that are established in the respective RODs for Sites 20 and 178. For example, the Parcel 20 Reuse Plan states, "The existing landfill area has potential space for a public gathering area and may include parking, recreational fields, a dog park, and gathering spaces such as picnic tables or gazebos;" however, there is no mention of the Site 20 Land Use Control Implementation Plan (LUCIP) LUCUs to "Protect human receptors from contact with the soil COCs and the landfill waste. Maintain the site in accordance with the Operation and Maintenance Plan and as required by 35 Illinois Administrative Code [IAC] 811.111" or "Prohibit unauthorized intrusive activity into or excavation of the landfill cap" in the scoping request or Parcel 20 Reuse Plan. Further, the Site 178 (Ordnance School Lake) LUCIP is still under development and has yet to be reviewed and approved by regulators. We recommend that the DEIS discuss LUCUs. Section 3.4 [Ordnance and Explosives (OE) and Munitions Debris (MD)] of the Parcel 20 Reuse Plan indicates that Sites 20 and 73, "were confirmed disposal areas for munitions constituents based on historical contamination detected in the landfills, and uncontrolled dumping of munitions and munitions constituents may have occurred throughout Parcel 20." However, the scoping request and Parcel 20 Reuse Plan do not discuss how potential exposure to munitions and munitions constituents will be mitigated. This is of particular concern given the proposed recreation areas and proposed recreational trails included in the conceptual redevelopment alternatives. We recommend that the DEIS discuss such mitigation. The scoping request states, "Since publishing its reuse plan, the LRA also has indicated its interest in an interim use lease agreement and/or an early transfer agreement that would allow construction of a solar energy facility atop the capped landfill within LRA Parcel 20;" however, no further details were provided. For example, it is unclear how the construction of a solar energy facility atop the capped landfill at Site 20 will meet the Site 20 LUCIP LUCUs to "Protect human receptors from contact with the soil COCs and the landfill waste. Maintain the site in accordance with the Operation and Maintenance Plan and as required by 35 Illinois Administrative Code [IAC] 811.111" or "Prohibit unauthorized intrusive activity into or excavation of the landfill cap." We recommend that the DEIS discuss such proper site maintenance. Based on Sections 8.2 (Alternative 2: Commander's Pond Lite) and 8.3 (Alternative 3: Commander's Pond Full) of the Parcel 20 Reuse Plan, the conceptual redevelopment alternatives would require approximately 18 to 42 acres to be dredged including areas previously remediated. However, the cost and dredging estimates in Sections 9.2 (Cost Estimates) and 9.3 (Dredging Estimate) of the Parcel 20 Reuse Plan do not include details or costs associated with the management, characterization, or disposal of these dredged sediments. Constituents of concern at Site 178 previously included polynuclear aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), pesticides, and heavy metals. As such, it is unclear if the level of effort needed to dredge Site 178 has been sufficiently estimated. We recommend that the DEIS include an analysis of such costs. To date, the five CERCLA sites associated with LRA Parcel 20 have not been investigated for per- and polyfluoralkyl substances (PFAS) contamination. As such, it is unclear if the conceptual redevelopment alternatives and associated costing are sufficiently representative should a PFAS remedial action be warranted. We recommend that the DEIS consider how the alternatives would be affected if a PFAS remedial action is undertaken. Assuming the Parcel 20 Reuse Plan will be an appendix to a future DEIS, ensure that revisions to the Parcel 20 Reuse Plan include detailed information regarding the implementation of LUCUs under the conceptual redevelopment alternatives, following regulatory approval of the LUCIP for Site 178. Ensure the Parcel 20 Reuse Plan clarifies how potential exposure to munitions and munitions constituents will be mitigated. Revise the Parcel 20 Reuse Plan to include information about all conceptual redevelopment alternatives and provide the plans that ensure that any solar facility components installed on the landfill cover will not adversely affect the final cover system. Revise the Parcel 20 Reuse Plan to discuss the management, characterization, and disposal of all sediments to be dredged, and include a discussion on the sediments' impact on costs and schedule. This plan should also include additional characterization of the non-remediated portions of Commander's Pond. Ensure the Parcel 20 Reuse Plan discusses how potential exposure to PFAS will be characterized and potentially mitigated given the lack of PFAS characterization of the sites. <p>Footnote:</p> <ol style="list-style-type: none"> The issues and recommendations provided herein do not represent a comprehensive regulatory and permitting review of the Parcel 20 Reuse Plan. Should the property be transferred, the EPA and other appropriate parties should be contacted regarding pertinent regulations and permitting requirements.
062e	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Water	<p>3. AQUATIC RESOURCES</p> <p>A. The scoping information indicates that Parcel 20 provides 1) accessibility to water, roads, and rail, demonstrating access for port-related development, and 2) drains into creeks and sloughs of the Apple and Mississippi Rivers, replenishes groundwater supplies via low areas on the site, and contains bottomland forest. Due to its location on the landscape, it is likely that Parcel 20 contains wetlands and streams. Placing fill into wetlands or streams and/or relocation of or encapsulation of streams may trigger Clean Water Act Section 404 permitting and the need for CWA Section 401 water quality certification from the Illinois EPA.</p> <p>Recommendations for the DEIS:</p> <ol style="list-style-type: none"> Before the DEIS is released for public review and comment, the following should be completed: <ul style="list-style-type: none"> Complete a formal wetland and Waters of the U.S. delineation to know definitively where wetlands, streams, and other regulated Waters of the U.S. are located. EPA recommends that this delineation is included in (as an appendix to) the DEIS. The DEIS should provide accurate information on impacts to regulated water resources as well as information on how those impacts will be mitigated. Determine ownership of Brickhouse Slough and Apple River. Identify acreage for both direct (e.g., permanent fill, access roads, etc.), indirect (e.g., changes in hydrology, etc.), and temporary (e.g., temporary fill, staging areas, etc.) impacts to regulated water resources, including wetlands, for each action alternative. Understanding that plans have not yet been developed, using a range to identify impacts would be useful to understand potential impacts (e.g., anticipate 100-150 acres of wetland impact). Disclose how sequencing established by the CWA Section 404(b)(1) Guidelines, namely, avoidance first, followed by demonstration of impact minimization, and mitigation for unavoidable impacts was applied to determine aquatic impacts. The Least Environmentally Damaging Practicable Alternative (LEDPA) alternative(s) should be clearly identified.⁹ Consider proximity to USFWS Upper Mississippi River National Wildlife & Fish Refuge and the Mississippi River. Discuss potential wetland and stream mitigation requirements, if applicable. Include baseline water quality information. Discuss impairments¹⁰ precluding meeting water quality standards and analyze how the proposed project, including all alternatives and the No Action Alternative, could affect the listing of waterbodies (both positively and negatively). Describe proposed measures to capture and filter stormwater runoff, preliminary drainage design, and proposed stormwater filtration for proposed infrastructure. Describe potential erosion impacts caused by barge floating. <p>B. A floodplain determination study¹¹ should be conducted prior to the DEIS. If the project is determined to be within a mapped floodplain, project modifications to critical infrastructure placement or other modifications may be required.</p> <p>Recommendation for the DEIS:</p> <ol style="list-style-type: none"> Identify portions of the project area identified as 100-year floodplain. Analyze effects to downstream hydrologic flows as a result of building within the 100-year floodplain and the potential for increased downstream flooding. Identify design elements that will allow the proposed project to be built safely within a 100-year floodplain, if applicable. <p>Footnotes:</p> <ol style="list-style-type: none"> The CWA Section 404(b)(1) guidelines call for the Least Environmentally Damaging Practicable Alternative (LEDPA) to be selected to address impacts to wetlands, streams, and other waters of the United States. Impacts to CWA Section 303(d)-listed water bodies. https://msc.fema.gov/portal/home.
062f	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Water	<p>4. SEDIMENT SAMPLING/MANAGEMENT</p> <p>A. The quality of sediments will need to be evaluated in accordance with the joint USEPA/USACE Great Lakes Dredged Material Testing and Evaluation Manual (1998) and Evaluation of Dredged Material Proposed for Discharge in Waters of the U.S.—Testing Manual (1998). If sediment is determined to be clean enough for beneficial re-use, EPA strongly recommends various re-use options are evaluated in the DEIS.</p> <p>Recommendations for the DEIS:</p> <ol style="list-style-type: none"> Before the DEIS is released for public review and comment, sediment testing should be completed and submitted to USACE. Sampling points should cover potentially-disturbed areas (e.g., Ordnance Lake, Brickhouse Slough, and Apple River). EPA strongly recommends the DEIS include an exhibit showing sampling points for potentially-disturbed areas (e.g., Ordnance Lake, Brickhouse Slough, and Apple River). Provide results of sediment testing as an appendix to the DEIS. Discuss the quality of sediments and placement options based on sediment testing results (e.g., contaminated versus uncontaminated materials). Quantify the amount of sediment that will need to be dredged initially to launch the project (e.g., Ordnance Lake, Brickhouse Slough, and Apple River). Discuss the amount and frequency of maintenance dredging (e.g., for at least 20 years) 12 that will be required to maintain a 9-foot deep channel leading into and within Ordnance Lake, Brickhouse Slough, and Apple River. USACE dredging during normal weather patterns will likely serve as a guide. Identify where dredged materials from normal maintenance will be placed based on testing results. Discuss recent flood events on the Mississippi River (e.g., last 20-30 years), as well as anticipated changes in frequency and magnitude of such events. Discuss the quantity of sediment¹³ that may need to be dredged based on recent and anticipated flooding events and where the dredged materials will be placed. Discuss the impacts to USACE infrastructure (e.g., wing dams, closing dams, etc.) and commercial navigation from dredging activities as well as barge access. Discuss the impacts to barge traffic and shorelines caused by barge floating or mooring. Discuss where dredged materials will be staged for dewatering. Consider whether different processes will be needed for contaminated versus uncontaminated dredged materials, if applicable. If contaminated material needs to be dredged, discuss potential placement locations and transportation plan to move contaminated material (e.g., number of trucks, hauling routes, etc.). Discuss opportunities for beneficial re-use of dredged materials. Include information describing potential transport options for re-use materials. Include results of communication with Illinois EPA regarding effluent testing and compliance requirements. USEPA recommends that copies of correspondence with state agencies are included in the DEIS. <p>Footnotes:</p> <ol style="list-style-type: none"> https://www.publications.usace.army.mil/portals/76/publications/engineermanuals/em_1110-2-5025.pdf, pg. 46. Provide an average amount based on recent flood events on the Mississippi River.

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Comment Number	Commenter's Information	Topic 1	Comment
062g	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Air Quality/Cimate	<p>5. AIR RESOURCES AND EMISSIONS IMPACTS</p> <p>A. LRA's finalized 2023 reuse plan alternatives would result in emissions from dredging and construction equipment in addition to ongoing emissions from the operation and maintenance of the commercial and industrial inland commodities shipping facility. Even temporary construction emissions have the potential to impact human health, especially in sensitive populations, such as the elderly, children, and those with impaired respiratory systems. In 2002, EPA classified diesel emissions as a likely human carcinogen, and in 2012 the International Agency for Research on Cancer concluded diesel exhaust is carcinogenic to humans.¹⁴ Diesel exhaust can worsen heart and lung disease, especially in vulnerable and sensitive populations.</p> <p>Recommendations for the DEIS:</p> <ol style="list-style-type: none"> 1. Discuss the current air quality in the project area. Indicate whether the project area is in non-attainment and/or maintenance status for any National Ambient Air Quality Standard. 2. Discuss potential emissions and impacts expected from implementation of the land transfer and potential reuse. Consider equipment used for construction, such as barges, truck trips, and hauling of materials, as well as operation and maintenance of shipping facilities. 3. Quantify estimates of all reasonably-foreseeable direct (e.g., construction and operation) and indirect (e.g., off-site material hauling and disposal) emissions from the proposed Project over its anticipated lifetime for all alternatives, including the No Action Alternative, broken out by emission type. EPA recommends, consistent with NEPA, that all regulated air pollutants, including criteria pollutants, air toxic and GHGs be addressed as applicable. 4. Ensure the DEIS clearly states the period of operational emissions used in calculations (i.e., the length of the Project life or Project contract(s)). Clearly disclose the scenario under which operational emissions estimates are made. 5. Discuss whether the emissions from the proposed project, and any cumulative emissions, are likely to impact the NAAQS or air toxics standards or the project would impact the ability of Illinois to meet GHG reduction provisions. 6. Identify and discuss specific measures to reduce construction, operation and maintenance emissions, and how such mitigation can be achieved in practice, such as through contracts, permit conditions, and Memorandum of Understanding. EPA recommends DoA consider: (1) requiring dust suppressant strategies, such as watering soils; (2) limiting and enforcing idling time for construction trucks and heavy equipment; (3) soliciting bids that require low-emission technologies or advanced emission control systems and 4) developing a construction traffic management plan that ensures trucks hauling materials and heavy machinery avoid areas where children congregate within adjacent neighborhoods, and when possible, route construction traffic away from schools, daycare facilities, and parks, using crossing guards when such area cannot be avoided. In addition to air quality benefits, careful routing may protect children from vehicle-pedestrian accidents. Additional best practices are identified in the enclosed Appendix A <u>Construction Emission Control Recommendations</u>. <p><i>Footnote:</i></p> <p>14. For more information on EPA's classification, see https://iris.epa.gov/ChemicalLanding/&substance_nmbr=642.</p>
062h	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Proposed Action/Alternatives	<p>6. PROJECT DESIGN / PROJECT STAGING</p> <p>A. Careful project design and staging could minimize impact and reduce permitting requirements while increasing safety and efficiency.</p>
062i	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Utilities/Infrastructure	<p>Recommendations for the DEIS:</p> <ol style="list-style-type: none"> 1. Consider impacts to existing infrastructure (e.g., drinking water intake locations, sewer/septic, utilities, stormwater and effluent discharge point sources, existing public and private piers, and boat ramps) and how construction would impact or otherwise affect this infrastructure.
062j	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Water	<ol style="list-style-type: none"> 2. Consider potential effects to water quality due to dredging, construction activities, and in-water work (e.g., sediment curtains, turbidity monitors, silt fencing, etc.). Include information about specific tools or mitigation measures that are typically used to protect water quality during these activities.
062k	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Water	<ol style="list-style-type: none"> 3. Ensure that the wetland delineation to be undertaken includes all staging locations and that all staging and access road areas are investigated for the presence of regulated water resources.
062l	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Proposed Action/Alternatives	<ol style="list-style-type: none"> 4. Provide maps and figures showing all contractor staging locations, access routes, and temporary road/mobilization locations, including areas of work within waterways.
062m	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Coordination/Communication	<ol style="list-style-type: none"> 5. Provide information pertaining to coordination with relevant state resource agencies regarding required permitting as well as any required mitigation for proposed work.

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Comment Number	Commenter's Information	Topic 1	Comment
062n	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Socioeconomics	<p>7. SOCIOECONOMIC IMPACTS AND PUBLIC INVOLVEMENT</p> <p>A. Consideration of the human environment is within the scope of NEPA's purpose to assure all Americans have access to safe, healthful, productive, and esthetically- and culturally-pleasing surroundings.15 The LRA's finalized 2023 reuse plan includes a demographic and economic analysis and details public involvement efforts. From 2010 to 2020, population changes for Savanna, Carroll and Jo Daviess counties declined for the population under age 60 and increased for population above 60 years old.16 Public and technical advisory committee input during the LRA plan development identified redevelopment priorities to include sustainable development, job creation, port/multi-modal development, economic development, recreation, and conservation.17 Economic impact analysis of the alternatives identified the proposed alternatives would result regional benefits of 370 direct, indirect, and tertiary person-year jobs under the preferred alternative for redevelopment of Parcel 20.18 The forthcoming DEIS should analyze if the Project actions (or the alternatives, including the No Action Alternative) will significantly affect local communities and/or Tribes.</p> <p>Recommendations for the DEIS:</p> <ol style="list-style-type: none"> Federal agencies should analyze socioeconomic, human health, and environmental effects based on the best available science and information on effects arising from exposure to pollution and other environmental hazards. Disclose demographic information and identify the presence of communities that could experience adverse socioeconomic, human health, or environmental effects from the proposed Project. Include an analysis and conclusion regarding whether the proposed Project or any action alternatives, including the No Action Alternative, may have potentially significant adverse effects on local communities. Disclose existing and projected changes in population, housing, and economic conditions in the project area and surrounding region in the affected environment. Describe how these changes may alter environmental conditions, including any possible changes in traffic, noise, and other effects. Describe how projected increase in jobs from the proposed project may affect population growth, housing stock, and health and environmental conditions in the area. <p>B. Outreach and public engagement are underlying pillars of NEPA. Given that the proposed Project's activities would affect the local community, EPA anticipates the forthcoming DEIS will detail DoA's approach to solicit public comments from those who may be affected by the proposed action.</p> <p>Recommendations for the DEIS:</p> <ol style="list-style-type: none"> Describe public involvement and targeted outreach19 to seek public comment from communities within and adjacent to the Project area. EPA recommends DoA conduct outreach in plain language and languages other than English spoken by residents and workers in and/or near the Project area. Consider local knowledge and linguistically-isolated populations within the Project area. Seek input regarding proposed mitigation measures and incorporate additional measures identified through public engagement with communities. For any significant adverse effects identified, consider mitigation measures consistent with NEPA. <p>Footnotes:</p> <ol style="list-style-type: none"> See 42 U.S.C. § 4331(2). Section 4.3, Population, Jo Carroll Depot Local Redevelopment Authority Final Reuse Plan for Parcel 20, June 2023. Section 7.2.6, Public and TAC Input, Jo Carroll Depot Local Redevelopment Authority Final Reuse Plan for Parcel 20, June 2023. Section 7.2.6, Public and TAC Input, Jo Carroll Depot Local Redevelopment Authority Final Reuse Plan for Parcel 20, June 2023. Consider engaging the public early and often, proactively seek full representation from the community, consider public comments and feedback, incorporate feedback into the project.
062o	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Air Quality/Climate	<p>8. RESILIENCY AND ADAPTATION:</p> <p>A. Given the significant infrastructure investment of this project, consideration of the impacts of climate, such as increased temperature and extreme weather events, on the project are important considerations for facility design.</p> <p>Recommendations for the DEIS:</p> <ol style="list-style-type: none"> Consider the environmental effects of the proposed project (e.g., the potential of a proposed action to exacerbate or mitigate flooding events and the associated release and/or containment of newly exposed contaminants; assessment of emissions and reductions from the proposed action, as described in the air resources section above). Describe changing conditions (e.g., temperature and frequency and severity of storm events) and assess how such changes could affect the proposed project and all identified alternatives. Discuss the implications of the expected increase in GHGs should the proposed project be implemented. Additionally, discuss the ramifications of making it more difficult to meet state emissions goals due to the increase in GHGs. Include a comparison of the effects of extreme weather events (e.g., temperature and frequency and severity of storm events) on the proposed action the No Action alternative, and other action alternatives carried forward for analysis. Identify and evaluate practices to reduce and mitigate the expected emissions from the proposed project (e.g., barge and truck emissions). EPA recommends practices enclosed in the Construction Emission Control Recommendations. Mitigation measures may also include, for example, reforestation of land to offset projected emissions associated with the alternatives.
062p	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Water	<ol style="list-style-type: none"> Incorporate robust resilience and risk reduction considerations into: (1) project design and engineering; (2) construction oversight; (3) commitments for protective measures related to stormwater and erosion; and (4) routine monitoring during operations.
062q	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Utilities/Infrastructure	<p>9. ENERGY EFFICIENCY AND ENVIRONMENTAL BEST PRACTICES</p> <p>A. Energy-efficient design and material selection could reduce operations costs and promote a high-quality work environment, while also better protecting the environment. Recycling construction debris also preserves valuable landfill space and makes use of materials that have high embodied energy.</p> <p>Recommendations for the DEIS:</p> <ol style="list-style-type: none"> Examine whether any new buildings associated with the project can achieve Leadership in Energy & Environmental Design (LEED) certification at the platinum level (or design for net-zero energy usage). Best practices for energy efficiency and sustainable building design can include the use of energy-efficient building materials, such as south-facing skylights and windows, motion-sensored lighting, solar, wind, and/or geothermal power, and Energy Star certified windows and doors. In addition to reducing the overall environmental footprint, green building certification programs promote health by encouraging practices that protect indoor air quality. At a minimum, EPA encourages DoA to analyze the strengths and feasibility of these strategies. Discuss whether proposed roads, parking lots, sidewalks, or other surfaces slated for driving or walking can incorporate permeable pavement or porous pavers to reduce runoff. Effectively treating stormwater runoff is particularly important, considering the aquatic resources in the area. Identify opportunities for additional green stormwater management practices. Opportunities include, but are not limited to, green roofs, bioswales, and rain gardens. Identify opportunities to convert areas around buildings associated with the project20 to native habitats, increasing the area which can be beneficially used for pollinators, stormwater infiltration or detention, and aesthetics, among other functions. Consider recycling a high percentage of construction and demolition debris. Replacing raw materials with recycled materials for infrastructure components. Options include, but are not limited to: <ol style="list-style-type: none"> Using recycled materials to replace carbon-intensive Portland Cement in concrete as "supplementary cementitious material"; Using tire-derived aggregate in lightweight embankment fill and retaining wall backfill; and Using recycled materials in pavement applications, such as crushed recycled concrete, recycled asphalt pavement, and rubberized asphalt concrete. Also, in some circumstances, demolished onsite asphalt can be re-used (e.g., cold in-place recycling or full depth reclamation). <p>Footnote:</p> <ol style="list-style-type: none"> Areas not planned for operations.

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062r	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Biological	<p>10. NATURAL FEATURES A. The Refuge borders Parcel 20 on three side that includes all water access routes to the Mississippi River. It appears that proposed re-use will extend into Refuge lands, where Federally-listed species have been documented. Recommendations for the DEIS: 1. Discuss coordination with the U.S. Fish and Wildlife Service regarding potential impacts to the USFWS Upper Mississippi River National Wildlife & Fish Refuge and whether proposed activities are compatible uses of Refuge lands and waters. Consider activities associated with construction (e.g., installing utilities on Refuge lands) as well as operation of proposed features. 2. Quantify the acreage of trees that would need to be removed in the project area. Develop a disposal management plan to address tree trunks removed from the landscape. Rather than burning trees, consider offering the trees to the community (e.g., chipping trees for community use, etc.). EPA recommends trees should not be burned due to negative air impacts. If trees must be burned, the Illinois Pollution Control Board and the IEPA regulate open burning. 3. Discuss voluntary tree replacement. EPA recommends the LRA commit to voluntary tree mitigation at a 1:1 ratio. Working with USFWS and/or the Illinois Department of Natural Resources would help provide suitable native species and planting locations. 4. Coordinate with USACE to discuss potential impacts to Rock Island District's rehabilitation and enhancement projects currently in the feasibility stage.²¹ Evaluate how the proposed project would support the goals, objectives, and actions of USACE projects and well as water quality goals and commitments of Illinois. 5. Discuss potential impacts to local, state, and/or Federal habitat connectivity and/or restoration projects underway or reasonably foreseeably in Pool 13 of the Mississippi River. B. Section 7 of the Endangered Species Act directs all Federal agencies to ensure that any action they authorize, fund, or carry out will not jeopardize the continued existence of a Federally threatened or endangered species or to proposed or designated critical habitat for an identified species. Additionally, the Fish and Wildlife Coordination Act²² requires that agencies consult with the USFWS and State wildlife agencies concerning the conservation of wildlife resources where the water or any stream or other water body is proposed to be controlled or modified by a Federal agency or any public or private agency operating under a Federal permit. USFWS's Information for Planning and Consultation²³ tool can be used to identify potential Federally- listed endangered, threatened, and candidate species (along with any essential experimental species populations) within the Project area. IPaC can also be used to determine if Migratory Birds of Conservation Concern²⁴ maybe found within the Project area. Recommendations for the DEIS: 1. Discuss potential impacts to Federally- and state-listed threatened or endangered species. The fact that critical habitat is not designated for all listed species does not equate to an analysis of potential impacts to the species themselves as a result of the proposed re-use plan. In particular, consider impacts to mussel species from dredging, barge traffic, spills, etc. 2. Discuss coordination in compliance with the Fish and Wildlife Coordination Act. Include results of coordination, concurrences, and stipulations with the USFWS and Illinois Department of Natural Resources regarding Federally- and State-listed species in the forthcoming DEIS. 3. Discuss potential effects to the migratory bird breeding season and habitat connectivity in the project area. 4. Include commitments to adhere to all USFWS and ILDNR recommendations to protect species, including, but not limited to, seasonal restrictions for in-water work. Footnotes: 21. Projects in feasibility phase: Steamboat Island, Lower Pool 13, and Green Island. See Rock Island District. 22. 16 U.S.C. §861-666(e); PL 85-624. See https://www.fws.gov/law/fish-and-wildlife-coordination-act. 23. The USFWS hosts the IPaC tool as a planning project tool to assist with the environmental review process, https://ipac.ecosphere.fws.gov/. 24. Birds of Conservation concern are species, subspecies, and populations of all migratory nongame birds that, without additional conservation actions, are likely to become candidates for listing under the Endangered Species Act. See: https://www.fws.gov/program/migratory-birds/species.</p>
062s	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Biological	<p>11. NON-NATIVE INVASIVE SPECIES (NNIS) A. Based on the proximity of the project area to the Refuge and the Mississippi River, the potential for the proposed project to spread terrestrial and aquatic NNIS is high. Care needs to be taken to reduce the spread of NNIS during project planning and implementation. Recommendations for the DEIS: 1. Provide baseline information regarding the current locations and acreages of terrestrial and aquatic NNIS in the project area. 2. Discuss how the project will comply with Executive Order 13112 – Safeguarding the Nation from the Impacts of Invasive Species. Include a discussion of standard best management practices (e.g., washing construction equipment) that will be used to eliminate the spread of terrestrial and aquatic NNIS into, as well as out of, the project area. 3. Discuss how Illinois' guidelines for terrestrial and aquatic NNIS will be incorporated into the project²⁵. 4. Assuming NNIS are present in the project area, discuss measures that can be taken to control or eradicate existing populations, ideally before earthmoving activities begin (e.g., washing equipment). Footnote: 25. https://dnr.illinois.gov/conservation/iwap/invasivespecies.html.</p>
062t	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Cumulative Effects	<p>12. REASONABLY-FORESEEABLE ENVIRONMENTAL EFFECTS A. Development along the Mississippi River has a lengthy history. The impacts resulting from the proposed action's incremental impacts when added to the impacts of other past, present, and reasonably-foreseeable future actions, regardless of what agency (Federal or non-Federal) undertakes such actions should be analyzed.²⁶ Recommendations for the DEIS: 1. Discuss potential reasonably-foreseeable environmental effects to resources in the project area that could be affected by the proposed project (e.g., USFWS Refuge and the Mississippi River). 2. Consider reasonably-foreseeable environmental effects as a result of the proposed project (e.g., existing roadway improvements to transport off-loaded materials to nearest high traffic roadway; impacts to existing rail operations; induced growth in the form of convenience stores, gas stations, etc.). Regional or county-wide smart growth or land use plans should inform the discussion of induced growth. Footnote: 26. See 42 U.S.C. § 1508.1.</p>
062u	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Cultural/Historic	<p>13. HISTORIC AND CULTURAL RESOURCES A. The National Historic Preservation Act and NEPA are independent statutes, yet may be executed concurrently to optimize efficiencies, transparencies, and accountability to better understand the effects to the human, natural, and cultural environment as a result of the proposed Project. Recommendations for the DEIS: 1. Document coordination and input received from the State Historic Preservation Office and Tribal Historic Preservation Office, if applicable, and Tribes who may have cultural or religious associations with the area, under Section 106 of the NHPA. 2. Discuss how each alternative may affect historical or archeological resources, including historic properties that are listed on the National Register of Historic Properties or eligible for listing. Explain how DoA has and will continue to address input received from the SHPO, THPO, and Tribes. 3. Describe the process that will be used for (1) addressing inadvertent discoveries (e.g., Tribal remains, artifacts, other culturally or historically sensitive items) and, (2) complying with the Native American Graves Protection and Repatriation Act and the Archaeological Resources Protection Act, as applicable.</p>
062v	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Coordination/Communication	<p>14. INTERAGENCY COORDINATION / PERMITTING A. Implementation of NEPA requires interagency coordination with multiple stakeholders, including Federal and state resource agencies, Tribes, local governments, and affected landowners. For all environmental impact categories requiring coordination with other Federal and state resource agencies, EPA recommends copies of DoA's letters to those agencies, as well as the responses from those agencies, are provided as appendices to the DEIS. Recommendations for the DEIS: 1. Include copies of all interagency coordination sent to, and received from Federal and state resource agencies, Tribes, and local municipalities. 2. Include a list of all Federal, state, and local permits that would be required to undertake the Preferred Alternative (e.g., ownership transfer Apple River Island, Refuge property, etc.). 3. Describe permitting/mitigation process and responsibilities if parcel is transferred.</p>

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062w	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	NEPA	<p>16. OTHER COMMENTS</p> <p>A. The DEIS should indicate how comments received during the scoping period were addressed.</p> <p>Recommendations for the DEIS:</p> <ol style="list-style-type: none"> 1. Create an appendix that includes all comments received during the DEIS scoping period, including any applicable transcripts of comments from the public. 2. Create an appendix that includes all correspondence sent to and received from government agencies regarding the proposed project. 3. Create a chart that lists the following: <ol style="list-style-type: none"> a) all comments received during the scoping and DEIS review periods; b) DoA's response with a reference to the DEIS section that was changed as a result of the comment, if applicable. Include section and page number for ease of reference; and c) associated mitigation efforts with responsible entity. 4. Create a chart listing proposed mitigation and clarify which features will become a commitment. 5. EPA recommends all technical terms be explained in plain language. 6. EPA recommend DoA access the following databases to obtain environmental information related to the project area: <ol style="list-style-type: none"> a) WATERS27: https://www.epa.gov/waterdata/waters-watershed-assessment-tracking-environmental-results-system b) Envirofacts28: https://www3.epa.gov/envirofacts/multisystem.html c) NEPAassist: https://www.epa.gov/nepa/nepassist d) CWA 303(d) Listed Impaired Waters: https://epa.illinois.gov/topics/water-quality/watershed-management/tmdls/303d-list.html e) National Ambient Air Quality Standards status: https://www3.epa.gov/airquality/greenbook/anayo_il.html
063a	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Proposed Action/Alternatives	<p>The U.S. Environmental Protection Agency (EPA) has reviewed the Department of the Army's (DoA) November 27, 2023, scoping request for reuse of a 132-acre parcel of the Savanna Army Depot Activity (SVAD) and expected subsequent reuse of this acreage. This letter provides EPA's comments on the scoping request and Jo Carroll Depot Local Redevelopment Authority Final Reuse Plan for Parcel 20, Former Savanna Army Depot, dated June 2023 (hereinafter the Parcel 20 Reuse Plan), pursuant to our authorities under the National Environmental Policy Act (NEPA), the Council on Environmental Quality's (CEQ) NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.</p> <p>The SVAD site is a 13,062-acre former DoA installation located on the eastern bank of the Mississippi River, seven miles north of Savanna, Illinois. Between 1917 and 1995, the DoA used the property for artillery weapons and ammunition testing, storage of ordnance, and the loading and renovating of shells and bombs. The 1995 Base Realignment and Closure (BRAC) Commission recommended closure of SVAD, and the DoA officially closed SVAD in 2000. The DoA has been conducting environmental remediation to clean-up surplus property in preparation for eventual property transfer.</p> <p>On January 17, 2018, the DoA published notice in the Federal Register indicating surplus property was available at SVAD for public benefit purposes and that the Jo Carroll Depot Local Redevelopment Authority (LRA) had been recognized by the Department of Defense as the Local Redevelopment Authority for this surplus property. The LRA performed an analysis (the Parcel 20 Reuse Plan) in support of reuse planning for LRA Parcel 20, which covers 132 acres, for DoA's use when preparing the NEPA scoping document.</p> <p>LRA Parcel 20 is 132 acres of undeveloped land within the SVAD. It is bordered by the Upper Mississippi River National Wildlife and Fish Refuge (Refuge) to the west, the Apple River to the east and south, and the Mississippi River to the west. The Parcel includes low-lying areas associated with the Apple River, Brickhouse Slough, and Commander's Pond. An active Burlington Northern Santa Fe Railway line bisects the Parcel from northwest to southeast but is not part of the Parcel under consideration for transfer. Parcel 20 lies almost completely within the floodplain and is adjacent to the Refuge.</p> <p>The LRA presented DoA with three conceptual reuse alternatives for redevelopment of LRA Parcel 20. The LRA's primary focus consists of a no-cost economic development conveyance; each of the three conceptual reuse alternatives proposes commercial and industrial development and passive recreational development. Since publishing its reuse plan, the LRA also indicated interest in an interim use lease agreement and/or early transfer agreement that would permit construction of a solar energy facility atop an existing capped landfill located within LRA Parcel 20.</p> <p>Three conceptual alternatives for redevelopment of Parcel 20 were identified in the scoping document as follows:</p> <p>Alternative 1 (Brickhouse Slough) - This alternative prioritizes fleet development of a dry bulk and liquid bulk wharf on the Brickhouse Slough and recreational use. Key port infrastructure includes a barge fleet area, an 800 foot dry and liquid bulk wharf, a floating dry dock, a wharf access road, a haul road, a liquid bulk pipeline, and a conveyor system.</p> <p>Alternative 2 (Commander's Pond Lite) - This alternative expands on Alternative 1 and adds a 600-foot lift-on/lift-off wharf to allow the handling of two 250-foot barges simultaneously to support expansion of specialty and breakbulk cargos and dry dock capacity. This concept would require approximately 18 acres of dredging within the Commander's Pond area to support access to Brickhouse Slough.</p> <p>Alternative 3 (Commander's Pond Full) - This alternative expands on Alternative 2 and adds additional port support to include an additional 350-foot lift-on/lift-off wharf to allow the handling of two 250-foot barges simultaneously, a repair fleet area, and the inclusion of an aquatic habitat restoration area. This concept would require approximately 42 acres of dredging within the Commander's Pond area with 26 acres to support cargo activities and the remaining 16 acres dedicated for aquatic habitat restoration.</p> <p>The LRA preferred alternative is Alternative 3. The scoping information indicates the timing for capital expenditures is not fully established and will depend in large part on market interest and development participation by private partners as well as regulatory and permitting issues. To facilitate implementation, the alternatives are designed to phase into each other seamlessly and sequentially. For example, Alternative 1 could be initiated immediately with a target five-year completion window, while Alternatives 2 and 3 could follow in a five-year plus completion window.</p> <p>Footnote:</p> <ol style="list-style-type: none"> 1. Fleet would provide "parking areas" while cargo is being loaded/offloaded.
063b	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	NEPA	<p>According to the scoping information, the development of these parcels by the LRA could not occur if the land was not transferred to it by the DoA. According to NEPA regulations, connected actions are those actions that could not or would not occur but for another action (e.g., the proposed land transfer from DoA to LRA). Connected actions must be analyzed in the same NEPA document, because the environmental impacts generated from the non-DoA action would not occur but for the DoA action of transferring Parcel 20.2</p> <p>Footnote:</p> <ol style="list-style-type: none"> 2. 40 CFR 1508.25 (a)(11)
063c	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Coordination/Communication	EPA's detailed NEPA scoping comments are enclosed with this letter. We recommend that the forthcoming Draft Environmental Assessment (EA) address these comments and our recommendations, which generally relate to Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) sites, impacts to wetlands and aquatic resources, environmental justice, greenhouse gases and climate change, project design and environmental best practices, natural features, and non-native, invasive species.
063d	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Other	Thank you for the opportunity to review and provide comments at this stage of project development. Please send an electronic copy of future NEPA documents to RSNEPA@epa.gov. If you would like to discuss the contents of this letter further, please contact Kathy Kowal, lead NEPA reviewer for this project, at kowal.kathleen@epa.gov. Ms. Kowal is also available at 312-353-5206

Scoping Comments for the SVADA LRA Parcel 20 EIS

Comment Number	Commenter's Information	Topic 1	Comment
063e	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Hazardous Materials/Waste	<p>COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT (CERCLA) SITES</p> <p>LRA Parcel 20 includes CERCLA sites which were previously investigated [e.g., Site 20 (Abandoned Landfill), Site 73 (Stables Landfill), Site 77 (1917-Era Powder Magazines), Site 130 (Vincent Road Septic System), Shop Area (Buildings 100 through 129 Sanitary and Stormwater Sewer lines and Outfalls to Site 178 and Site 178 (Ordnance School Lake, also known as Commander's Pond)]. Based on information available to EPA, the current status of the CERCLA sites is as follows:</p> <p>Site 20 (Abandoned Landfill):</p> <p>According to the Final Record of Decision, Site 20 – Abandoned Landfill and Site 99 – Building 762, CF Plant Battery Shop and Leaching Pits, Savanna Army Depot Activity, Savanna, Illinois, dated June 2016 (Site 20 Record of Decision (ROD)), the selected remedy included landfill capping with hotspot removal, long-term groundwater monitoring, and land use controls (LUCs). Based on the Final Land Use Control Implementation Plan, Site 20 Abandoned Landfill, Savanna Army Depot Activity, Savanna, Illinois, dated October 2019 (Site 20 LUCIP), the institutional and engineering controls for Site 20 include:</p> <ul style="list-style-type: none"> -environmental covenants to prohibit residential use, access to groundwater, and intrusive activities (including agricultural use) at the site; -Illinois Environmental Protection Agency (Illinois EPA), DoA, and EPA review of LUC inspections and approval processes; -maintenance of a vegetated engineered landfill cap constructed with at least 2 feet of compacted clay and 6 inches of top soil and turf reinforcement mat including the intended vegetative cover and the underlying soil such that erosion gullies and localized settlement do not occur; -use of site boundaries to limit site access: wetlands and the Apple River form the northeastern, eastern, and southern boundaries and a railroad right-of-way and fencing along the western boundary of the site; and, -signs and engineered cap delineation posts are installed along the boundary of the site. <p>Based on the Final Second Five-Year Review Report for Savanna Army Depot Activity Superfund Site, Savanna, Jo Daviess and Carroll Counties, Illinois, dated June 2020 (2nd FYR), the excavation, offsite disposal of soil, and installation of a vegetated engineered landfill cap have been completed. However, the UECA [Uniform Environmental Covenants Act] environmental covenants have not been executed. Groundwater monitoring is still ongoing.</p> <p>Site 73 (Stables Landfill):</p> <p>According to the Final Record of Decision, Site 73 – Stable Landfill and Site 178 – Ordnance School Lake, Savanna Army Depot Activity, Savanna, Illinois, dated August 2016 (Sites 73 & 178 ROD), the selected remedy for Site 73 includes "[R]emoval and disposal of bulk debris and drums as nonhazardous waste following appropriate characterization; excavation of soil containing COCs [contaminants of concern] at concentrations above the remediation goals for residential use; transportation of the excavated debris and soil to a RCRA [Resource Conservation and Recovery Act] Subtitle D permitted facility (assuming the soil is nonhazardous); and, restoration of the site, which may include restoration of disturbed wetlands."</p> <p>Based on the 2nd FYR, "Remedial action was completed in December 2018 and the completion report is in the final stages. Site meets requirements for unrestricted use."</p> <p>Site 178 (Ordnance School Lake also known as Commander's Pond):</p> <p>According to the Sites 73 & 178 ROD, the selected remedy for Site 178 includes "[E]xcavation of outfall surface soil and sediment along the western shoreline containing COCs at concentrations above recreational remediation goals; transportation of excavated material to a RCRA Subtitle D permitted facility for disposal (assuming the material is nonhazardous); site restoration, including regrading and/or bank stabilization; implementation of administrative LUCs (e.g., zoning laws) to maintain recreational or industrial/commercial use of the property; development of a Land Use Control Implementation Plan (LUCIP) to document strategies for implementing, maintaining, monitoring, and enforcing LUCs at the site; and, periodic monitoring of the LUCs conducted annually and as part of CERCLA 5-year reviews; in the event that the site changes land use designation, the 5-year review will be used as a mechanism to determine if the site conditions require a modification or amendment to the site controls."</p> <p>Based on the 2nd FYR, "[E]xcavation and offsite disposal was conducted in December 2018. LUC Implementation Plan (LUCIP) is under review. LUCs need to be implemented."</p> <p>Site 77 (1917-Era Powder Magazines) and Site 130 (Vincent Road Septic System):</p> <p>Sites 77 and 130 were initially evaluated and determined not to require further investigation or remediation.</p>
063f	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Hazardous Materials/Waste	<p>EPA Concerns and Recommendations³ for the forthcoming Draft EA:</p> <p>Given the current status of the CERCLA sites above, EPA has identified the following issues with regard to information contained in the scoping request and the Parcel 20 Reuse Plan:</p> <p>Issue 1: The Scoping Request and the Parcel 20 Reuse Plan did not discuss how LUCs will be implemented and maintained under the conceptual redevelopment alternatives. As such, it is unclear if any of the three proposed reuse alternatives presented in the Parcel 20 Reuse Plan would impact the implementation of required LUCs that are established in the respective RODs for Sites 20 and 178. For example, the Parcel 20 Reuse Plan states, "The existing landfill area has potential space for a public gathering area and may include parking, recreational fields, a dog park, and gathering spaces such as picnic tables or gazebos;" however, there is no mention of the Site 20 LUCIP LUCs to "Protect human receptors from contact with the soil COCs and the landfill waste. Maintain the site in accordance with the Operation and Maintenance Plan and as required by 35 Illinois Administrative Code [IAC] 811.111" or "Prohibit unauthorized intrusive activity into or excavation of the landfill cap" in the scoping request or Parcel 20 Reuse Plan. Further, the Site 178 (Ordnance School Lake) land use control implementation plan (LUCIP) is still under development and has yet to be reviewed and approved by regulators.</p> <p>Issue 2: Section 3.4 [Ordnance and Explosives (OE) and Munitions Debris (MD)] of the Parcel 20 Reuse Plan indicates that Sites 20 and 73, "were confirmed disposal areas for munitions constituents based on historical contamination detected in the landfills, and uncontrolled dumping of munitions and munitions constituents may have occurred throughout Parcel 20." However, the scoping request and Parcel 20 Reuse Plan do not discuss how potential exposure to munitions and munitions constituents will be mitigated. This is of particular concern given the proposed recreation areas and proposed recreational trails included in the conceptual redevelopment alternatives.</p> <p>Issue 3: The scoping request states, "Since publishing its reuse plan, the LRA also has indicated its interest in an interim use lease agreement and/or an early transfer agreement that would allow construction of a solar energy facility atop the capped landfill within LRA Parcel 20;" however, no further details were provided. For example, it is unclear how the construction of a solar energy facility atop the capped landfill at Site 20 will meet the Site 20 LUCIP LUCs to "Protect human receptors from contact with the soil COCs and the landfill waste. Maintain the site in accordance with the Operation and Maintenance Plan and as required by 35 Illinois Administrative Code [IAC] 811.111" or "Prohibit unauthorized intrusive activity into or excavation of the landfill cap."</p> <p>Issue 4: Based on Sections 8.2 (Alternative 2: Commander's Pond Lite) and 8.3 (Alternative 3: Commander's Pond Full) of the Parcel 20 Reuse Plan, the conceptual redevelopment alternatives would require approximately 18 to 42 acres to be dredged including areas previously remediated. However, the cost and dredging estimates in Sections 9.2 (Cost Estimates) and 9.3 (Dredging Estimate) of the Parcel 20 Reuse Plan do not include details or costs associated with the management, characterization, or disposal of these dredged sediments. Constituents of concern at Site 178 previously included polynuclear aromatic hydrocarbons (PAHs), polychlorinated biphenyls (PCBs), pesticides, and heavy metals. As such, it is unclear if the level of effort needed to dredge Site 178 has been sufficiently estimated.</p> <p>Issue 5: To date, the five CERCLA sites associated with LRA Parcel 20 have not been investigated for per- and polyfluoroalkyl substances (PFAS) contamination. As such, it is unclear if the conceptual redevelopment alternatives and associated costing are sufficiently representative should a PFAS remedial action be warranted.</p> <p>Footnote:</p> <p>The issues and recommendations provided herein do not represent a comprehensive regulatory and permitting review of the Parcel 20 Reuse Plan. Should the property be transferred, the EPA and other appropriate parties should be contacted regarding pertinent regulations and permitting requirements.</p>
063g	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Hazardous Materials/Waste	<p>Recommendations for the Draft EA:</p> <ul style="list-style-type: none"> -Assuming the Parcel 20 Reuse Plan will be an appendix to a future Draft EA, ensure that revisions to the Parcel 20 Reuse Plan include detailed information regarding the implementation of LUCs under the conceptual redevelopment alternatives, following regulatory approval of the LUCIP for Site 178. -Ensure the Parcel 20 Reuse Plan clarifies how potential exposure to munitions and munitions constituents will be mitigated. -Revise the Parcel 20 Reuse Plan to include information about all conceptual redevelopment alternatives and demonstrate that any solar facility components installed on the landfill cover will not adversely affect the final cover system. -Revise the Parcel 20 Reuse Plan to discuss the management, characterization, and disposal of all sediments to be dredged, and include a discussion on the sediments' impact on costs and schedule. This plan should also include additional characterization of the non-remediated portions of Commander's Pond. -Ensure the Parcel 20 Reuse Plan discusses how potential exposure to PFAS will be characterized and potentially mitigated given the lack of PFAS characterization of the sites.
063h	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Water	<p>WETLANDS/STREAMS/AQUATIC RESOURCES</p> <p>The scoping information indicates that Parcel 20 provides accessibility to water, roads, and rail, demonstrating access for port-related development. The scoping information indicates that Parcel 20 drains into creeks and sloughs of the Apple and Mississippi Rivers, replenishes groundwater supplies via low areas on the site, and contains bottomland forest. Due to its landscape location, it is likely that Parcel 20 contains wetlands and streams. Fill into wetlands, or fill into, relocation of, or encapsulation of streams may trigger Clean Water Act (CWA) Section 404 permitting and the need for CWA Section 401 water quality certification from the Illinois EPA (IEPA).</p> <p>Recommendations for the Draft EA:</p> <ul style="list-style-type: none"> -Before the Draft EA is released for public review and comment, a formal wetland and Waters of the U.S. delineation should be completed to know definitively where wetlands, streams, and other regulated Waters of the U.S. are located. EPA strongly recommends that this delineation be completed before and included in (as an appendix to) the Draft EA. The Draft EA should provide accurate information on impacts to regulated water resources, and information on how those impacts will be mitigated. -Identify acreage for both direct (e.g., permanent fill), indirect (e.g., changes in hydrology), and temporary (e.g., temporary fill) impacts to regulated water resources, including wetlands, for each action alternative. Understanding that plans have not yet been developed, using a range to identify impacts would be useful to understand potential impacts (e.g., 100-150 acres of wetland impact); -Disclose how sequencing established by the CWA Section 404(b)(1) Guidelines, namely, avoidance first, followed by demonstration of impact minimization, and mitigation for unavoidable impacts was applied to determine aquatic impacts. The CWA Section 404(b)(1) guidelines call for the Least Environmentally Damaging Practicable Alternative (LEDPA) to be selected to address impacts to wetlands, streams, and other waters of the United States; -Discuss potential wetland and stream mitigation requirements, if applicable; -Discuss the current conditions of surface water resources and potential impacts from the proposed project (e.g., impacts to Clean Water Act (CWA) Section 303(d)-listed water bodies and their impaired status); -Describe proposed measures to capture and filter stormwater runoff, preliminary drainage design, and proposed stormwater filtration; -Discuss whether sediments that would need to be dredged from Brickhouse Slough and Commander's Pond have been tested, and where clean dredged materials will be placed. -Consider beneficial re-use of dredged materials. <p>PROJECT DESIGN / PROJECT Siting</p> <p>As the studies of alternatives progresses and design advances, ensure the Draft EA considers the following:</p> <p>Recommendations for the Draft EA:</p> <ul style="list-style-type: none"> -Consider impacts on existing infrastructure (e.g., drinking water intake locations, sewer/septic, utilities, stormwater and effluent discharge point sources, existing public and private piers and boat ramps) and how construction would impact or otherwise affect this infrastructure. -Provide information on contractor staging locations, access routes and locations, and mobilization. -Ensure that the wetland delineation to be undertaken includes all staging locations and that all staging and access road areas are investigated for the presence of regulated water resources. -Provide maps and figures showing all staging, access, and temporary road/mobilization locations, including areas of work within waterways. -Provide information on coordination with the state resource agencies regarding required permitting, and any required mitigation for proposed work.

Scoping Comments for the SVADA LRA Parcel 20 EIS

Comment Number	Commenter's Information	Topic 1	Comment
063i	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Environmental Justice/Children	<p>ENVIRONMENTAL JUSTICE AND CHILDREN'S HEALTH</p> <p>DoA should analyze if construction, operation, and maintenance of the proposed project will impact communities with environmental justice (EJ) concerns. Our recommendations below suggest opportunities to further analyze, disclose, and reduce such impacts.</p> <p>Recommendations for the Draft EA:</p> <ul style="list-style-type: none"> -Identify the presence of low-income and/or minority communities within the project area and within the broader area that could experience environmental impacts from the proposed project. Disclose demographic information and summarize input from community members. -Describe past activities and future plans to engage minority populations, low-income populations, and Tribes during the environmental review and planning phase, and, if the project commences, during construction and operations. -Evaluate the impacts of this proposal on low-income and/or minority communities and sensitive receptors (e.g., children, people with asthma, etc.). -Include an analysis and conclusion regarding whether the Proposed Action or any action alternatives may have disproportionately high and adverse impacts on low income or minority communities, as specified in CEQ's Environmental Justice Guidance.⁴ -Compare project impacts on low-income and minority populations with an appropriate reference community to determine whether there may be disproportionate impacts. Consider risk of exposure to hazardous/toxic materials associated with the proposed construction and operation and air quality and noise impacts due to construction. -Consider any disproportionate non-project-related pollution exposures that communities of concern may already be experiencing, as well as any disproportionate non-pollution stressors that may make the communities susceptible to pollution, such as health conditions, other social determinants of health, and disproportionate vulnerability related to climate change. -Identify measures to (1) ensure meaningful community engagement; (2) minimize adverse community impacts; and (3) avoid disproportionate impacts to communities with EJ concerns. -Use census-tract-level information to initially help locate communities with EJ concerns. For initial screening, use EPA's EJSCREEN⁵ mapping tool. -In conducting the EJ analysis, utilize resources such as the Promising Practices Report⁶ and the Community Guide to EJ and NEPA Methods⁷ to appropriately engage in meaningful, targeted, community outreach, analyze impacts, and advance environmental justice principles through NEPA implementation. -Consider cumulative environmental impacts to minority populations, low-income populations, Tribes, and indigenous peoples in the project area within the environmental justice analysis and disclose conclusions on those impacts. -Provide an analysis and findings as to whether the Proposed Project and all alternatives, including the No Action Alternative, would likely have disproportionate adverse impacts on minority populations, low-income populations, or Tribes. Identify what those impacts may be and include measures that DoA will take to avoid, minimize, or mitigate impacts. -Establish material hauling routes away from places where children live, learn, and play, to the extent feasible. Consider homes, schools, daycares, and playgrounds. In addition to air quality benefits, careful routing may protect children from vehicle-pedestrian accidents. Identify potential material hauling routes in the Draft EA. <p>Footnotes:</p> <p>4. CEQ's Environmental Justice Guidance Under the National Environmental Policy Act. See Section III, Part C-4. https://www.epa.gov/sites/default/files/2015-02/documents/ej_guidance_nepa_ceq1297.pdf?VersionId=78iNGldwSTZ5E2xH0aHqE96_Tphbgd</p> <p>5. http://www.epa.gov/ej/ejscreen</p> <p>6. https://www.epa.gov/sites/default/files/2016-08/documents/nejpa_promising_practices_document_2016.pdf</p> <p>7. https://www.energy.gov/sites/prod/files/2019/05/63/NEPA%20Community%20Guide%202019.pdf</p>
063j	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Air Quality/Climate	<p>CLIMATE CHANGE</p> <p>Executive Order 14008: Tackling the Climate Crisis at Home and Abroad states, "The United States and the world face a profound climate crisis. We have a narrow moment to pursue action...to avoid the most catastrophic impacts of that crisis and to seize the opportunity that tackling climate change presents." The U.S. Global Change Research Program's National Climate Assessment provides data and scenarios that may be helpful in assessing trends in temperature, precipitation, and frequency and severity of storm events.⁸</p> <p>Any Action Alternative would directly release greenhouse gas (GHG) emissions during construction from trucks hauling materials, workers' vehicles, and operation of construction equipment. It is important for the Draft EA to fully quantify and adequately disclose the impacts of the GHG emissions from the No Action alternative and all action alternatives and discuss the implications of those emissions in light of science-based policies established to avoid the worsening impacts of climate change.</p> <p>Federal courts have consistently held that NEPA requires agencies to disclose and consider climate impacts in their reviews, including impacts from GHG emissions. On January 9, 2023, the Council on Environmental Quality (CEQ) published interim guidance to assist Federal agencies in assessing and disclosing climate change impacts during environmental reviews.⁹ CEQ developed this interim guidance in response to Executive Order 13990 - Protecting Public Health and the Environment and Restoring Science to Tackle the Climate Crisis. This interim guidance was effective immediately. CEQ indicated that agencies should use this interim guidance to inform the NEPA review for all new proposed actions and may use it for evaluations in process, as agencies deem appropriate, such as informing the consideration of alternatives or helping address comments raised through the public comment process. EPA recommends that DoA apply the interim guidance as appropriate, to ensure robust consideration of potential climate impacts, mitigation, and adaptation issues.</p> <p>In addition, estimates of the social cost of greenhouse gases (SC-GHG10) are informative for assessing the impacts of GHG emissions. SC-GHG estimates allow analysts to monetize the societal value of changes in GHG emissions from actions that have small, or marginal, impacts on cumulative global emissions. Estimates of the social cost of carbon (SC-CO2) and other greenhouse gases (e.g., social cost of methane (SC-CH4)) have been used for over a decade in Federal government analyses. Quantification of anticipated GHG releases and associated SC-GHG comparisons among all alternatives (including the No Action Alternative scenarios) within the Draft EA would inform project decision-making and provide clear support for implementing all practicable measures to minimize GHG emissions and releases.</p> <p>Footnote:</p> <p>8 Information on changing climate conditions is available through the National Climate Assessment at: https://nca2023.globalchange.gov/</p>
063k	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Air Quality/Climate	<p>Recommendations for the Draft EA: DoA should apply the interim guidance as appropriate, to ensure robust consideration of potential climate impacts, mitigation, and adaptation issues. Additional recommendations are as follows:</p> <p>Emissions & SC-GHG Disclosure and Analysis</p> <ul style="list-style-type: none"> -Include a detailed discussion of the project's reasonably foreseeable direct and indirect GHG emissions in the context of actions necessary to achieve Illinois' policies and GHG emission reduction goals¹¹ as well as national policy and GHG emission reduction goals over the anticipated project lifetime, including the U.S. 2030 Paris targets and the 2050 goal for net-zero energy emissions. -Quantify estimates of all direct and indirect GHG emissions¹² from the proposed project over its anticipated lifetime for all alternatives, including the No Action Alternative, broken out by GHG type. Include and analyze potential upstream and downstream GHG emissions. -Use SC-GHG estimates to disclose and consider the climate damages from net changes in direct and indirect emissions of CO2 and other GHGs resulting from the proposed project. To do so, EPA recommends a breakdown of estimated net GHG emission changes by individual gas, rather than relying on CO2-equivalent (CO2e) estimates, and then monetize the climate impacts associated with each GHG using the corresponding social cost estimate (i.e., monetize CH4 emissions changes expected to occur with the social cost of methane (SC-CH4) estimate for emissions).¹³ When applying SC-GHG estimates, just as with tools to quantify emissions, USGS should disclose the assumptions (e.g., discount rates) and uncertainties associated with such analysis and the need for updates over time to reflect evolving science and economics of climate impacts. -Use comparisons of GHG emissions and SC-GHG across alternatives to inform project decision-making. <p>Resilience and Adaptation</p> <ul style="list-style-type: none"> -Describe changing climate conditions (i.e., temperatures and frequency and severity of storm events) and assess how such changes could impact the proposed project and the environmental impacts of the proposed project and alternatives. Consider increases in frequency and severity of storm events, flooding, drought, and periods of high heat. Discuss how stormwater infrastructure could be designed to decrease impacts to aquatic resources. -Incorporate robust climate resilience and adaption considerations into (1) project design and engineering; (2) construction oversight; (3) commitments for protective measures related to stormwater and erosion; and (4) routine monitoring. The Draft EA should describe how DoA has addressed such considerations and provide a rationale for any reasonable alternatives to enhance resilience that were not adopted or discussed in detail. <p>Reduction and Mitigation</p> <ul style="list-style-type: none"> -Identify practices to reduce and mitigate GHG emissions: include commitments by DoA and LRA to do so in the Draft EA. We recommend DoA consider practices in the enclosed Construction Emission Control Checklist. -Analyze best available control strategies, while considering low sensitive environmental and health receptors (e.g., schools and play areas along truck travel routes). <p>Footnotes:</p> <p>11. ncluding, but not limited to, the goals for Illinois laid out here: https://www2.illinois.gov/IIISNews/23893-Climate_and_Equitable_Jobs_Act.pdf</p> <p>12. As discussed in Section IV(A) of CEQ's 2023 interim guidance, "agencies generally should quantify all reasonably foreseeable emissions associated with a proposed action and reasonable alternatives (as well as the no-action alternative). Quantification should include the reasonably foreseeable direct and indirect GHG emissions of their proposed actions. Agencies also should disclose the information and any assumptions used in the analysis and explain any uncertainty. In assessing a proposed action's, and reasonable alternatives', reasonably foreseeable direct and indirect GHG emissions, the agency should use the best available information."</p> <p>13. Transforming gases into CO2e using Global Warming Potential (GWP) metrics, and then multiplying the CO2e tons by the SC-CO2, is not as accurate as a direct calculation of the social costs of non-CO2 GHGs. This is because GHGs differ not just in their potential to absorb infrared radiation over a given time frame, but also in the temporal pathway of their impact on radiative forcing and in their impacts on physical endpoints other than temperature change, both of which are relevant for estimating their social cost but not reflected in the GWP. See the Interagency Working Group on Social Cost of Greenhouse Gases' February 2021 Technical Support Document: Social Cost of Carbon, Methane, and Nitrous Oxide Interim Estimates under Executive Order 13990 for more discussion and the range of annual SC-CO2, SC-CH4, and SC-N2O estimates currently used in Federal benefit-costs analyses.</p>

Scoping Comments for the SVADA LRA Parcel 20 EIS

Comment Number	Commenter's Information	Topic 1	Comment
063l	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Utilities/Infrastructure	<p>ENERGY EFFICIENCY AND ENVIRONMENTAL BEST PRACTICES Energy efficient design and material selection could reduce operations costs and promote a high-quality work environment, while also better protecting the environment. Recycling construction debris also preserves valuable landfill space and makes use of materials that have high embodied energy.</p> <p>Recommendations for the Draft EA: DoA should consider committing to the following:</p> <ul style="list-style-type: none"> -Achieving Leadership in Energy & Environmental Design (LEED) certification at the platinum level (or design for net-zero energy usage) for any new buildings associated with the project. Best practices for energy efficiency and sustainable building design can include the use of energy-efficient building materials, such as south-facing skylights and windows, motion sensor lighting, solar, wind, and/or geothermal power, and Energy Star certified windows and doors. In addition to reducing the overall environmental footprint, green building certification programs promote health by encouraging practices that protect indoor air quality. At a minimum, EPA encourages DoA to commit to analyze the strengths and feasibility of these strategies; -Constructing proposed roads, parking lots, sidewalks, or other surfaces slated for driving or walking with using permeable pavement or porous pavers to reduce runoff; -Identifying and implementing of opportunities for additional green stormwater management practices. Opportunities include, but are not limited to, green roofs, bioswales, and rain gardens; -Ensuring areas around all new buildings associated with the project which are not planned for operations be considered for conversion to native habitats, increasing the area which can be beneficially used for wildlife, stormwater infiltration or detention, and aesthetics, among other functions; -Discussing to what extent DoA will require energy efficiency measures, greenhouse gas reductions, and other sustainability measures, per Executive Order 13693; -Incorporating electric vehicle charging stations in new parking areas and designating priority parking spots for carpools and low emission vehicles; -Committing to recycle a high percentage of construction and demolition debris; -Replacing raw materials with recycled materials for infrastructure components. Options include, but are not limited to: <ul style="list-style-type: none"> -Using recycled materials to replace carbon-intensive Portland Cement in concrete as "supplementary cementitious material;" -Using tire-derived aggregate in lightweight embankment fill and retaining wall backfill; and -Using recycled materials in pavement applications, such as crushed recycled concrete, recycled asphalt pavement, and rubberized asphalt concrete. Also, in some circumstances, demolished onsite asphalt can be re-used (e.g., cold in-place recycling or full depth reclamation).
063m	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Biological	<p>NATURAL FEATURES The Refuge borders Parcel 20 on three side that includes all water access routes to the Mississippi River. It appears that proposed re-use will extend into Refuge lands.</p> <p>Recommendations for the Draft EA:</p> <ul style="list-style-type: none"> -Discuss coordination with the U.S. Fish and Wildlife Service regarding potential impacts to the Refuge and whether proposed activities are compatible uses of Refuge lands and waters. Consider activities associated with construction (e.g., installing utilities on Refuge lands) as well as operation of proposed features; and -Discuss potential impact to Federally-listed threatened or endangered species listed in Table ES-2. The fact that critical habitat has not been designated for these species does not equate to an analysis of potential impacts to the species themselves as a result of the proposed re-use plan. In particular, consider impacts to mussel species.
063n	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Biological	<p>NON-NATIVE INVASIVE SPECIES (NNIS) Based on the proximity of the project area to the Refuge and the Mississippi River, the potential for the proposed project to spread terrestrial and aquatic NNIS is high. Care needs to be taken to reduce the spread of NNIS during project planning and implementation.</p> <p>Recommendations for the Draft EA:</p> <ul style="list-style-type: none"> -Provide baseline information pertaining to current locations and acreages of terrestrial and aquatic NNIS on project lands; -Discuss how the project will comply with Executive Order 13112 – Safeguarding the Nation from the Impacts of Invasive Species. include a discussion of standard best management practices (e.g., washing construction equipment) that will be used to eliminate the spread of NNIS into, as well as out of, the project area; and -Assuming NNIS are present in the project area, discuss measures that can be taken to control or eradicate existing populations, ideally before earthmoving activities begin.
063o	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Cumulative Effects	<p>CUMULATIVE IMPACTS ANALYSIS Development along the Mississippi River has a lengthy history. Cumulative impacts are impacts resulting from the proposed action's incremental impacts when added to the impacts of other past, present, and reasonably-foreseeable future actions, including those under the control of other entities.</p> <p>Recommendations for the Draft EA:</p> <ul style="list-style-type: none"> -Discuss potential direct, indirect and cumulative impacts to resources in the project area that could be affected by the proposed project; and -Consider reasonably-foreseeable impacts as a result of the proposed project (e.g., roadway improvements, induced growth, etc.). Regional or county-wide smart growth or land use plans should inform the discussion of induced growth and cumulative impacts.
063p	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Coordination/Communication	<p>INTERAGENCY COORDINATION The Draft EA should include a list of all Federal, state, and local permits that will be required to undertake the preferred alternative. For all environmental impact categories requiring coordination with other Federal and state resource agencies, EPA recommends copies of both your letters to those agencies, as well as the responses from those agencies, be provided as appendices to the Draft EA.</p>
063q	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Other	<p>OTHER COMMENTS EPA recommends all technical terms be explained in plain language in the Draft EA. The scoping letter requests information EPA may have regarding environmental resources in the project area. We invite DoA to access the following databases to obtain environmental information related to the project area:</p> <ul style="list-style-type: none"> -WATERS14: https://www.epa.gov/waterdata/waters-watershed-assessment-tracking-environmental-results-system -Envirofacts15: https://www3.epa.gov/enviro/facts/multisystem.html -EJSCREEN: https://www.epa.gov/ejscreen -NEPAssist: https://www.epa.gov/nepa/nepasist -CWA 303(3) Listed Impaired Waters: https://www.epa.gov/exposure-assessment-models/303d-listed-impaired-waters -National Ambient Air Quality Standards status: https://www3.epa.gov/airquality/greenbook/ianajo_1.html <p>Footnotes:</p> <ol style="list-style-type: none"> 14. The Watershed Assessment, Tracking & Environmental Results System (WATERS) unites water quality information previously available only from several independent and unconnected databases. 15. Includes enforcement and compliance information.
064a	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Other	The Fish and Wildlife Service is providing the following comments on the Parcel 20 EIS Cultural Resources document.
064b	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Cultural/Historic	<p>The document identifies: "Enclosure 2: Programmatic Agreement among United States Army, Illinois State Historic Preservation Officer, and Advisory Council on Historic Preservation for the Closure and Disposal of Savanna Army Depot Activity, Illinois" dated August 2000 states under "Section II. Caretaker Maintenance of Historic Properties: During the caretaker period prior to transfer of SVDA properties out of Federal ownership, the Army will ensure the protection of SVDA archeological sites determined to be on, or eligible for inclusion on the National Register. In furtherance of this effort, the Army will develop a plan to protect these sites and will provide the SHPO with a copy of the archeological site protection plan for comment."</p> <p>In "Enclosure 5: Preservation Covenant...The United States Army (Owner) and the Jo-Carroll Depot LRA (Recipient/Lessee) hereby covenant on behalf of themselves, their successors, and assigns at all times to the Illinois Department of Natural Resources State Historic Preservation Officer (Illinois SHPO) to maintain and preserve archaeological sites 11-CA-1 and 11-CA-142 as follows:</p> <ol style="list-style-type: none"> 1. The owner and Recipient/Lessee shall preserve and maintain archaeological sites 11-CA-1 and 11-CA-142 in their present condition to preserve and enhance those qualities that make these archaeological sites potentially eligible/eligible for inclusion in the National Register of Historic Places (NRHP). 2 No construction, alteration, or disturbance of the ground surface or any other thing shall be undertaken or permitted to be undertaken on archaeological sites 11-CA-1 and 11-CA-142 that would affect the integrity or the archaeological value of these sites without the express written permission of the Illinois Department of Natural Resources signed by a fully authorized representative thereof." <p>The document also identifies in "Enclosure 6: Archaeological Sites Directly and Indirectly Effected by the Army's Disposal of LRA Parcel 20". The location of Archaeological Site 11-CA-142 lies in the middle of the proposed tow/barge access route into Commander's Pond under LRA's proposed Alternatives 2 and 3 (Preferred Alternative). These two archaeological sites will be directly affected by construction activities within Parcel 20. In addition, Site 11-CA-143, lies within the proposed footprint of the Conveyor System/Liquid Pipeline/Wharf Access Road for all three Alternatives.</p>
064c	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Cultural/Historic	Neither the Cultural Resource EIS document nor the LRA's Reuse Plan identifies a site protection plan for the archaeological sites that will be affected. Both State and Federal policies require that archaeological sites will be protected.
064d	Name: Ed Britton Organization: USFWS, UMRNWFR Savanna District Affiliation: Federal Government Opinion: Oppose	Cultural/Historic	LRA will need to contact Fish and Wildlife Service and apply for an ARPA permit prior to any work that is planned within the Refuge.

Scoping Comments for the SVADA LRA Parcel 20 EIS

Comment Number	Commenter's Information	Topic 1	Comment
064e	Name: Ed Britton Organization: USFWS, UMRNWF Savanna District Affiliation: Federal Government Opinion: Oppose	Cultural/Historic	Thank you for the opportunity to comment on this Cultural Resource EIS document. Please let me know if you need additional information.
065a	Name: Krystle McClain Organization: USEPA, Region 5 Affiliation: Federal Government Opinion: Neutral	Cultural/Historic	Thank you for the letter inviting EPA Region 5 to coordinate with the U.S. Army under Section 106 of the National Historic Preservation Act. As this matter is outside of the scope of the EPA's expertise, we encourage the U.S. Army to continue coordination regarding cultural and archaeological resources with the IL SHPO and THPOs, if applicable. We take note of the correspondence, and we look forward to reviewing the forthcoming Draft Environmental Impact Statement to include updates pertaining to the formal Section 106 consultation.