Appendix G
Interagency and Intergovernmental Coordination and Consultation

Appendix G1. 2020 Coordination and Consultation

Enclosures are provided only for the first letter.

Responses received follow the letter sent.

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

Installation Manager 20 February 2020

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Tom Barounis, SR-6J
U.S. Environmental Protection Agency, Region 5
77 West Jackson Boulevard
Chicago, IL 60604-3590

Dear Mr. Barounis:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of disposal and reuse of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois. We would like to initiate consultation with you on this action.

SVADA is in northwestern Illinois along the Mississippi River, about 9 miles north of the city of Savanna, Illinois off Highway 84 (Figure 1). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure, and the Depot was officially closed in 2000. Since that time, the Army has been conducting environmental remediation to clean up SVADA surplus property in preparation for transfer, and transferring property as it is cleared. The Army transferred the majority of SVADA land to two federal agencies, the U.S. Fish and Wildlife Service (USFWS) and the U.S. Army Corps of Engineers (USACE), and some to a state agency, the Illinois Department of Natural Resources (IDNR), and the remaining property to the Jo-Carroll Depot Local Redevelopment Authority (LRA).

The Army is now looking to transfer an additional 132-acres to the LRA, land that was originally to be conveyed to the USFWS. In 2016, the USFWS withdrew interest in this parcel of land. In 2018, the land was officially identified as surplus by the Department of Defense (DoD) and the DoD recognized the Jo-Carroll Depot LRA as the LRA for this surplus property. The parcel is known as LRA Parcel 20. The LRA is in the process of developing a reuse plan for the parcel; potential reuses of the parcel to be evaluated in the EA are commercial, industrial, and recreational.

LRA Parcel 20 is undeveloped land at the southern end of the former SVADA, in Carroll County, Illinois (Figure 2). The parcel is bounded by the Apple River to the east and south and the Mississippi River to the west. Land use to the north of the parcel is the Savanna Industrial Park (formerly SVADA property), to the east and south is agricultural land, and to the west on the other side of the Mississippi River is undeveloped land in Iowa. The parcel is bisected from the northwest to the south by an active railroad line owned by the Burlington Northern Santa Fe (BNSF) Corporation; this rail line is not part of the parcel to be transferred. A sewage treatment plant owned by the Army is surrounded by LRA Parcel 20, but this is also not part of the parcel to be transferred.

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The Army's past operation of LRA Parcel 20 resulted in the release of various types of contaminants at three sites: Site 20 Abandoned Landfill; Site 73 Stables Landfill; and Site 178 Ordnance School Lake (Figure 2). The sites have been remediated or have remediation measures in place that are protective of human health and the environment. Land Use Controls (LUCs) and land use restrictions are also in place that would continue indefinitely, even after transfer or conveyance of the property, through an environmental covenant for the Site 20 Abandoned Landfill and Site 178 Ordnance School Lake.

If you have input regarding resources of concern to your agency or any questions concerning this BRAC action, please contact me at cathleen.m.collins.civ@mail.mil. We respectfully request that any input you wish to submit be provided within 30 calendar days of receipt of this letter. We will provide to you an electronic copy or weblink to the EA when it is available for public review and comment.

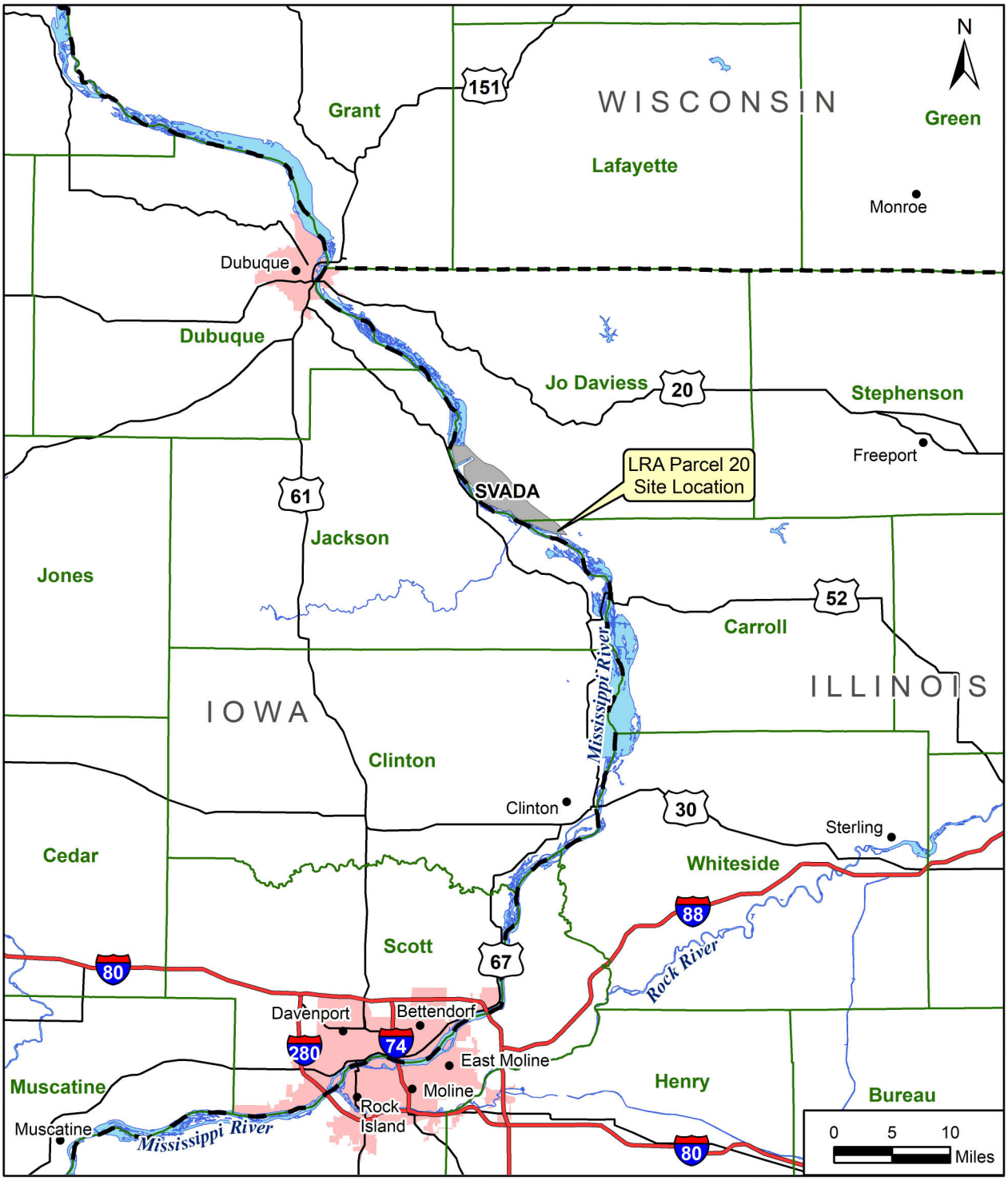
Sincerely,



Cathy M. Collins
Installation Manager

Enclosures

cc:
Mr. William (Todd) Knuth, USACE, Louisville District, SVADA Office
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Dr. Thomas Lineer, HQDA ACSIM, BRAC Program Manager

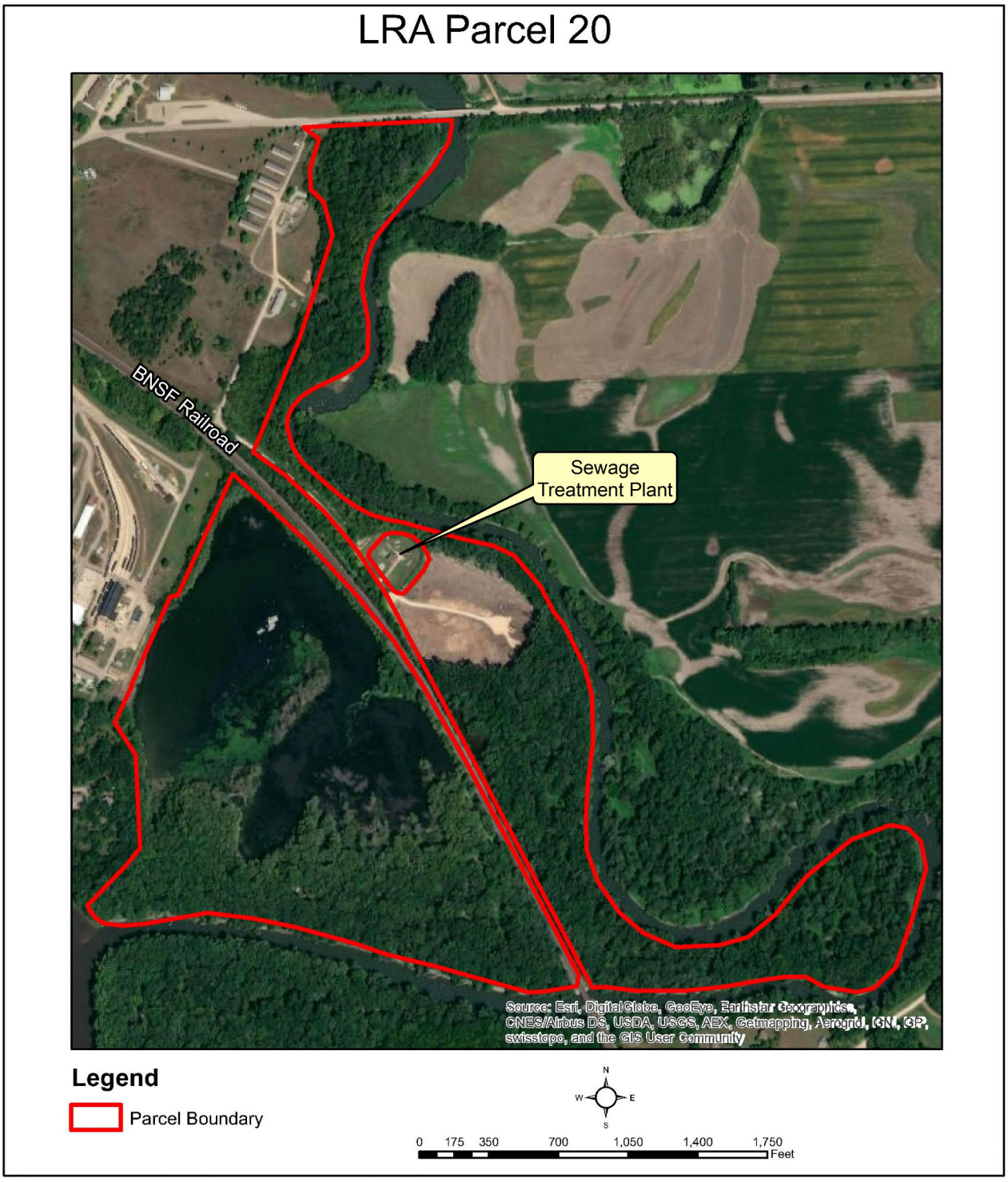


LEGEND

- State Boundary
- County Boundary
- Interstate Highway
- U.S. Route
- Urban Area
- Surface Water

Location Map

Figure 1



Site Map

Note: Boundaries are approximate.

Figure 2



Site Map

Note: Boundaries are approximate.

Figure 2

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

Installation Manager 20 February 2020

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Kraig McPeek, Field Office Supervisor
U.S. Fish and Wildlife Service
Illinois-Iowa Ecological Services Field Office
1511 47th Avenue
Moline, IL 61265

Dear Mr. McPeek:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of disposal and reuse of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois. We would like to initiate consultation with you on this action.

SVADA is in northwestern Illinois along the Mississippi River, about 9 miles north of the city of Savanna, Illinois off Highway 84 (Figure 1). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure, and the Depot was officially closed in 2000. Since that time, the Army has been conducting environmental remediation to clean up SVADA surplus property in preparation for transfer, and transferring property as it is cleared. The Army transferred the majority of SVADA land to two federal agencies, the U.S. Fish and Wildlife Service (USFWS) and the U.S. Army Corps of Engineers (USACE), and some to a state agency, the Illinois Department of Natural Resources (IDNR), and the remaining property to the Jo-Carroll Depot Local Redevelopment Authority (LRA).

The Army is now looking to transfer an additional 132-acres to the LRA, land that was originally to be conveyed to the USFWS. In 2016, the USFWS withdrew interest in this parcel of land. In 2018, the land was officially identified as surplus by the Department of Defense (DoD) and the DoD recognized the Jo-Carroll Depot LRA as the LRA for this surplus property. The parcel is known as LRA Parcel 20. The LRA is in the process of developing a reuse plan for the parcel; potential reuses of the parcel to be evaluated in the EA are commercial, industrial, and recreational.

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plant owned by the Army is surrounded by LRA Parcel 20, but this is also not part of the parcel to be transferred.

If you have input regarding natural resources of concern to your agency or any questions concerning this BRAC action, please contact me at cathleen.m.collins.civ@mail.mil. We respectfully request that any input you wish to submit be provided within 30 calendar days of receipt of this letter. We will provide to you an electronic copy or weblink to the EA when it is available for public review and comment.

Sincerely,



Cathy M. Collins
Installation Manager

Enclosures

cc:
Mr. William (Todd) Knuth, USACE, Louisville District, SVADA Office
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Dr. Thomas Lineer, HQDA ACSIM, BRAC Program Manager

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

Installation Manager 20 February 2020

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Ed Britton, District Manager
U.S. Fish and Wildlife Service
Upper Mississippi River National Wildlife and Fish Refuge
Savanna District
7071 Riverview Road
Thomson, IL 61285

Dear Mr. Britton:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of disposal and reuse of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois. We would like to initiate consultation with you on this action.

SVADA is in northwestern Illinois along the Mississippi River, about 9 miles north of the city of Savanna, Illinois off Highway 84 (Figure 1). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure, and the Depot was officially closed in 2000. Since that time, the Army has been conducting environmental remediation to clean up SVADA surplus property in preparation for transfer, and transferring property as it is cleared. The Army transferred the majority of SVADA land to two federal agencies, the U.S. Fish and Wildlife Service (USFWS) and the U.S. Army Corps of Engineers (USACE), and some to a state agency, the Illinois Department of Natural Resources (IDNR), and the remaining property to the Jo-Carroll Depot Local Redevelopment Authority (LRA).

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Sincerely,



Cathy M. Collins
Installation Manager

Enclosures

cc:
Mr. William (Todd) Knuth, USACE, Louisville District, SVADA Office
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Dr. Thomas Lineer, HQDA ACSIM, BRAC Program Manager

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 4, 2020

Cathy Collins
Installation Manager
Savanna Army Depot Activity
18935 B Street
Savanna, Illinois 61074

Dear Ms. Collins:

In response to your February 20, 2020 request for comments related to the disposal and reuse of LRA Parcel 20, the following information is provided.

The U.S. Fish and Wildlife Service has no concerns related to the disposal and reuse of Department of Army excess property identified as LRA Parcel 20 for redevelopment by the Jo-Carroll Depot Local Redevelopment Authority. Lands within the Upper Mississippi River National Wildlife and Fish Refuge lie adjacent to this parcel and are part of the National Wildlife Refuge System. Please be aware that any development activities proposed in the future for LRA Parcel 20, that would require associated development on adjacent refuge land, would have to be determined to be a compatible activity by refuge management.

There is potential for state and/or federal endangered and threatened species to be present within LRA Parcel 20. The Illinois Department of Natural Resources and the U.S. Fish and Wildlife Service Illinois-Iowa Ecological Services field office should be contacted to request any potential concerns by these offices for endangered and threatened species that may be impacted at this site.

Thank you for the opportunity to comment on this disposal and reuse of property at the Savanna Army Depot Activity.

Sincerely,

Ed Britton
District Manager

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

Installation Manager 20 February 2020

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Ms. Charlene Falco
Illinois Environmental Protection Agency
Bureau of Land
PO Box 19276
Springfield, IL 62794-9276

Dear Ms. Falco:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of disposal and reuse of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois. We would like to initiate consultation with you on this action.

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Sincerely,



Cathy M. Collins
Installation Manager

Enclosures

cc:
Mr. William (Todd) Knuth, USACE, Louisville District, SVADA Office
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Dr. Thomas Lineer, HQDA ACSIM, BRAC Program Manager

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

Installation Manager 20 February 2020

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Christopher Young, Office Director
Conservation Program
Illinois Department of Natural Resources
One Natural Resources Way
Springfield, IL 62702-1271

Dear Mr. Young:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of disposal and reuse of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois. We would like to initiate consultation with you on this action.

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plant owned by the Army is surrounded by LRA Parcel 20, but this is also not part of the parcel to be transferred.

If you have input regarding resources of concern to your agency or any questions concerning this BRAC action, please contact me at cathleen.m.collins.civ@mail.mil. We respectfully request that any input you wish to submit be provided within 30 calendar days of receipt of this letter. We will provide to you an electronic copy or weblink to the EA when it is available for public review and comment.

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Cathy M. Collins
Installation Manager

Enclosures

cc:
Mr. William (Todd) Knuth, USACE, Louisville District, SVADA Office
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Dr. Thomas Lineer, HQDA ACSIM, BRAC Program Manager

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

Installation Manager 20 February 2020

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Duane Ambroz, District Heritage Biologist
Lost Mound Unit
Division of Natural Heritage
Illinois Department of Natural Resources
3159 Crim Drive
Savanna, IL 61074

Dear Mr. Ambroz:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of disposal and reuse of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois. We would like to initiate consultation with you on this action.

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Sincerely,



Cathy M. Collins
Installation Manager

Enclosures

cc:
Mr. William (Todd) Knuth, USACE, Louisville District, SVADA Office
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Dr. Thomas Lineer, HQDA ACSIM, BRAC Program Manager

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

Installation Manager 20 February 2020

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Joe Sanfilippo
Iowa Department of Natural Resources
Field Office 1 – Northeast Iowa
909 West Main Street, #4
Manchester, IA 52057

Dear Mr. Sanfilippo:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of disposal and reuse of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois. We would like to initiate consultation with you on this action.

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Sincerely,



Cathy M. Collins
Installation Manager

Enclosures

cc:
Mr. William (Todd) Knuth, USACE, Louisville District, SVADA Office
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Dr. Thomas Lineer, HQDA ACSIM, BRAC Program Manager

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

Installation Manager 20 February 2020

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Ms. Carol (CJ) Wallace, Cultural Resources Coordinator
Illinois State Historic Preservation Office
Old State Capitol Building, 2nd Floor
One Old State Capitol Plaza
Springfield, IL 62701

Dear Ms. Wallace:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of disposal and reuse of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois. We would like to initiate consultation with you on this action.

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plant owned by the Army is surrounded by LRA Parcel 20, but this is also not part of the parcel to be transferred.

Preliminary background research has identified one known archaeological site near the Parcel 20 boundary. A Phase I archaeological survey of LRA Parcel 20 is scheduled to be completed in 2020.

If you have input regarding cultural resources of concern to your agency or any questions concerning this BRAC action, please contact me at cathleen.m.collins.civ@mail.mil. We respectfully request that any input you wish to submit be provided within 30 calendar days of receipt of this letter. We will provide to you an electronic copy or weblink to the EA and the archaeological survey when they are available for your review and comment.

Sincerely,



Cathy M. Collins
Installation Manager

Enclosures

cc:
Mr. William (Todd) Knuth, USACE, Louisville District, SVADA Office
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Dr. Thomas Lineer, HQDA ACSIM, BRAC Program Manager

ILLINOIS
DEPARTMENT OF NATURAL RESOURCES

Illinois Department of Natural Resources

www.dnr.illinois.gov

Mailing address: State Historic Preservation Office, 1 Old State Capitol Plaza, Springfield, IL 62701

SURVEY REQUEST

JB Pritzker, Governor
Colleen Callahan, Director

Carroll County PLEASE REFER TO: SHPO LOG #005022420
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

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".

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.

If you have 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

Enclosure

ILLINOIS
DEPARTMENT OF NATURAL RESOURCES

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

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

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 plowzone 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)

ILLINOIS-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
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Dr. Leslie B. Kirchler, RPA
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Dr. Thomas E. Berres
OurHeritage Archaeological Srvs, Inc.
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815-754-9611 / 758-5692 (fax)
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Midwest Archaeological
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P.O. Box 2533
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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
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2220 Mayfair Avenue
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CHICAGO METRO REGION
CON'T

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Ben Banks, MA, RPA
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1245 East Diehl Road, Suite 100
Naperville, Illinois 60563
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Jonathan Libbon, M.A., RPA
SWCA Environmental Consultants
200 W. 22nd St., Suite 220
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Dr. Phil Millhouse
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CENTRAL REGION

Ms. Karen A. Atwell
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10475 N 2300 Avenue
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Mr. Addison Kimmel, MA, RPA
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Rock Island, IL 61201
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Mr. Keith L. Barr
Archaeological & Architectural Surveys
Old Inn Farm
Rural Route 1
Fairview, Illinois 61432
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Mr. Lawrence A. Conrad
Western Illinois Archaeology Research
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Macomb, Illinois 61455
309-333-6783 or 836-3811
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Dr. Charles L. Rohrbaugh
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302 Kelly Drive
Normal, Illinois 61761
309-454-6590

Dr. Gregory Walz
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CENTRAL REGION CON'T

Dr. Brian Adams
Dr. Thomas Loebel
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217-333-0667 / 244-7458 (fax)

Mr. Mark C. Branstner
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Mr. David J. Nolan
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217-243-9491 7991 (fax)
Macomb Lab, 309-833-3097
Spfld Lab, 217-522-4295/4395 (fax)
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Dr. Brooke M. Morgan
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02/24/20

Mr. Joseph Craig
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METRO EAST REGION

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Dr. Alleen Betzenhauser
Coordinator, American Bottom Field Sta
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Robin Jorcke Harl
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SOUTHERN REGION

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Dr. Mark Wagner
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Center for Archaeological Investigations
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Mr. Charles O. Witty
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Reconnaissance (LGPAR)
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Jessica Allgood
405 Palestine Road
Stonefort, Illinois 62987
859/707-6384
jessicaraycox@gmail.com

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

Installation Manager 20 February 2020

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Marlon WhiteEagle, President
Ho-Chunk Nation of Wisconsin
PO Box 667
Black River Falls, WI 54615

Dear President WhiteEagle:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of disposal and reuse of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois. With this mailing, the Army is initiating government-to-government consultation for this proposed action in compliance with Section 106 of the National Historic Preservation Act.

SVADA is in northwestern Illinois along the Mississippi River, about 9 miles north of the city of Savanna, Illinois off Highway 84 (Figure 1). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure, and the Depot was officially closed in 2000. Since that time, the Army has been conducting environmental remediation to clean up SVADA surplus property in preparation for transfer, and transferring property as it is cleared. The Army transferred the majority of SVADA land to two federal agencies, the U.S. Fish and Wildlife Service (USFWS) and the U.S. Army Corps of Engineers (USACE), and some to a state agency, the Illinois Department of Natural Resources (IDNR), and the remaining property to the Jo-Carroll Depot Local Redevelopment Authority (LRA).

The Army is now looking to transfer an additional 132-acres to the LRA, land that was originally to be conveyed to the USFWS. In 2016, the USFWS withdrew interest in this parcel of land. In 2018, the land was officially identified as surplus by the Department of Defense (DoD) and the DoD recognized the Jo-Carroll Depot LRA as the LRA for this surplus property. The parcel is known as LRA Parcel 20. The LRA is in the process of developing a reuse plan for the parcel; potential reuses of the parcel to be evaluated in the EA are commercial, industrial, and recreational.

LRA Parcel 20 is undeveloped land at the southern end of SVADA, in Carroll County, Illinois (Figure 2). The parcel is bounded by the Apple River to the east and south and the Mississippi River to the west. Land use to the north of the parcel is the Savanna Industrial Park (formerly SVADA property), to the east and south is agricultural land, and to the west on the other side of the Mississippi River is undeveloped land in Iowa. The parcel is bisected from the northwest to the south by an active railroad line owned by the Burlington Northern Santa Fe (BNSF) Corporation; this rail line is not part of the parcel to be transferred. A sewage treatment

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plant owned by the Army is surrounded by LRA Parcel 20, but this is also not part of the parcel to be transferred.

Preliminary background research has identified one known archaeological site near the Parcel 20 boundary. A Phase I archaeological survey of LRA Parcel 20 is scheduled to be completed in 2020. We respectfully request any information you may have concerning Native American Resources or properties of religious, traditional, or cultural significance that could be affected by the proposed action on LRA Parcel 20.

If you wish to participate in the consultation for this action, please contact me at cathleen.m.collins.civ@mail.mil or at 815-273-8312. So that this process can continue to move forward, we would appreciate hearing from you within 30 calendar days of receipt of this letter. We will provide to you an electronic copy or weblink to the EA and the archaeological survey when they are available for your review and comment, or printed copies upon request.

Sincerely,



Cathy M. Collins
Installation Manager

Enclosures

cc:
Mr. William (Todd) Knuth, USACE, Louisville District, SVADA Office
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Dr. Thomas Lineer, HQDA ACSIM, BRAC Program Manager

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

Installation Manager 20 February 2020

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. William Quackenbush, THPO
Ho-Chunk Nation of Wisconsin
PO Box 667
Black River Falls, WI 54615

Dear Mr. Quackenbush:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of disposal and reuse of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois. With this mailing, the Army is initiating government-to-government consultation for this proposed action in compliance with Section 106 of the National Historic Preservation Act.

SVADA is in northwestern Illinois along the Mississippi River, about 9 miles north of the city of Savanna, Illinois off Highway 84 (Figure 1). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure, and the Depot was officially closed in 2000. Since that time, the Army has been conducting environmental remediation to clean up SVADA surplus property in preparation for transfer, and transferring property as it is cleared. The Army transferred the majority of SVADA land to two federal agencies, the U.S. Fish and Wildlife Service (USFWS) and the U.S. Army Corps of Engineers (USACE), and some to a state agency, the Illinois Department of Natural Resources (IDNR), and the remaining property to the Jo-Carroll Depot Local Redevelopment Authority (LRA).

The Army is now looking to transfer an additional 132-acres to the LRA, land that was originally to be conveyed to the USFWS. In 2016, the USFWS withdrew interest in this parcel of land. In 2018, the land was officially identified as surplus by the Department of Defense (DoD) and the DoD recognized the Jo-Carroll Depot LRA as the LRA for this surplus property. The parcel is known as LRA Parcel 20. The LRA is in the process of developing a reuse plan for the parcel; potential reuses of the parcel to be evaluated in the EA are commercial, industrial, and recreational.

LRA Parcel 20 is undeveloped land at the southern end of SVADA, in Carroll County, Illinois (Figure 2). The parcel is bounded by the Apple River to the east and south and the Mississippi River to the west. Land use to the north of the parcel is the Savanna Industrial Park (formerly SVADA property), to the east and south is agricultural land, and to the west on the other side of the Mississippi River is undeveloped land in Iowa. The parcel is bisected from the northwest to the south by an active railroad line owned by the Burlington Northern Santa Fe (BNSF) Corporation; this rail line is not part of the parcel to be transferred. A sewage treatment

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plant owned by the Army is surrounded by LRA Parcel 20, but this is also not part of the parcel to be transferred.

Preliminary background research has identified one known archaeological site near the Parcel 20 boundary. A Phase I archaeological survey of LRA Parcel 20 is scheduled to be completed in 2020. We respectfully request any information you may have concerning Native American Resources or properties of religious, traditional, or cultural significance that could be affected by the proposed action on LRA Parcel 20.

If you wish to participate in the consultation for this action, please contact me at cathleen.m.collins.civ@mail.mil or at 815-273-8312. So that this process can continue to move forward, we would appreciate hearing from you within 30 calendar days of receipt of this letter. We will provide to you an electronic copy or weblink to the EA and the archaeological survey when they are available for your review and comment, or printed copies upon request.

Sincerely,



Cathy M. Collins
Installation Manager

Enclosures

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Mr. William (Todd) Knuth, USACE, Louisville District, SVADA Office
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Dr. Thomas Lineer, HQDA ACSIM, BRAC Program Manager

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

Installation Manager 20 February 2020

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. David Pachecho, Chairman
Kickapoo Tribe of Oklahoma
PO Box 70
McLoud, OK 74851

Dear Chairman Pachecho:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of disposal and reuse of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois. With this mailing, the Army is initiating government-to-government consultation for this proposed action in compliance with Section 106 of the National Historic Preservation Act.

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Sincerely,



Cathy M. Collins
Installation Manager

Enclosures

cc:
Mr. William (Todd) Knuth, USACE, Louisville District, SVADA Office
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Dr. Thomas Lineer, HQDA ACSIM, BRAC Program Manager

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

Installation Manager 20 February 2020

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Kent Collier, NAGPRA Contact
Kickapoo Tribe of Oklahoma
PO Box 70
McLoud, OK 74851

Dear Mr. Collier:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of disposal and reuse of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois. With this mailing, the Army is initiating government-to-government consultation for this proposed action in compliance with Section 106 of the National Historic Preservation Act.

SVADA is in northwestern Illinois along the Mississippi River, about 9 miles north of the city of Savanna, Illinois off Highway 84 (Figure 1). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure, and the Depot was officially closed in 2000. Since that time, the Army has been conducting environmental remediation to clean up SVADA surplus property in preparation for transfer, and transferring property as it is cleared. The Army transferred the majority of SVADA land to two federal agencies, the U.S. Fish and Wildlife Service (USFWS) and the U.S. Army Corps of Engineers (USACE), and some to a state agency, the Illinois Department of Natural Resources (IDNR), and the remaining property to the Jo-Carroll Depot Local Redevelopment Authority (LRA).

The Army is now looking to transfer an additional 132-acres to the LRA, land that was originally to be conveyed to the USFWS. In 2016, the USFWS withdrew interest in this parcel of land. In 2018, the land was officially identified as surplus by the Department of Defense (DoD) and the DoD recognized the Jo-Carroll Depot LRA as the LRA for this surplus property. The parcel is known as LRA Parcel 20. The LRA is in the process of developing a reuse plan for the parcel; potential reuses of the parcel to be evaluated in the EA are commercial, industrial, and recreational.

LRA Parcel 20 is undeveloped land at the southern end of SVADA, in Carroll County, Illinois (Figure 2). The parcel is bounded by the Apple River to the east and south and the Mississippi River to the west. Land use to the north of the parcel is the Savanna Industrial Park (formerly SVADA property), to the east and south is agricultural land, and to the west on the other side of the Mississippi River is undeveloped land in Iowa. The parcel is bisected from the northwest to the south by an active railroad line owned by the Burlington Northern Santa Fe (BNSF) Corporation; this rail line is not part of the parcel to be transferred. A sewage treatment

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If you wish to participate in the consultation for this action, please contact me at cathleen.m.collins.civ@mail.mil or at 815-273-8312. So that this process can continue to move forward, we would appreciate hearing from you within 30 calendar days of receipt of this letter. We will provide to you an electronic copy or weblink to the EA and the archaeological survey when they are available for your review and comment, or printed copies upon request.

Sincerely,



Cathy M. Collins
Installation Manager

Enclosures

cc:
Mr. William (Todd) Knuth, USACE, Louisville District, SVADA Office
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Dr. Thomas Lineer, HQDA ACSIM, BRAC Program Manager

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

Installation Manager 20 February 2020

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Ms. Regina Gasco-Bentley, Chairperson
Little Traverse Bay Bands of Odawa Indians, Michigan
7500 Odawa Circle
Harbor Springs, MI 49740

Dear Chairperson Gasco-Bentley:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of disposal and reuse of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois. With this mailing, the Army is initiating government-to-government consultation for this proposed action in compliance with Section 106 of the National Historic Preservation Act.

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Sincerely,



Cathy M. Collins
Installation Manager

Enclosures

cc:
Mr. William (Todd) Knuth, USACE, Louisville District, SVADA Office
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Dr. Thomas Lineer, HQDA ACSIM, BRAC Program Manager

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

Installation Manager 20 February 2020

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Wesley Andrews, THPO
Little Traverse Bay Bands of Odawa Indians, Michigan
7500 Odawa Circle
Harbor Springs, MI 49740

Dear Mr. Andrews:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of disposal and reuse of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois. With this mailing, the Army is initiating government-to-government consultation for this proposed action in compliance with Section 106 of the National Historic Preservation Act.

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Sincerely,



Cathy M. Collins
Installation Manager

Enclosures

cc:
Mr. William (Todd) Knuth, USACE, Louisville District, SVADA Office
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Dr. Thomas Lineer, HQDA ACSIM, BRAC Program Manager

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

Installation Manager 20 February 2020

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Douglas Cox, Sr., Chairman
Menominee Indian Tribe of Wisconsin
PO Box 910
Keshena, WI 54135-0910

Dear Chairman Cox:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of disposal and reuse of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois. With this mailing, the Army is initiating government-to-government consultation for this proposed action in compliance with Section 106 of the National Historic Preservation Act.

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Sincerely,



Cathy M. Collins
Installation Manager

Enclosures

cc:
Mr. William (Todd) Knuth, USACE, Louisville District, SVADA Office
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Dr. Thomas Lineer, HQDA ACSIM, BRAC Program Manager

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

Installation Manager 20 February 2020

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. David Grignon, THPO
Menominee Indian Tribe of Wisconsin
PO Box 910
Keshena, WI 54135-0910

Dear Mr. Grignon:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of disposal and reuse of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois. With this mailing, the Army is initiating government-to-government consultation for this proposed action in compliance with Section 106 of the National Historic Preservation Act.

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Cathy M. Collins
Installation Manager

Enclosures

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Mr. William (Todd) Knuth, USACE, Louisville District, SVADA Office
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Dr. Thomas Lineer, HQDA ACSIM, BRAC Program Manager

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

Installation Manager 20 February 2020

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Milo Buffalo, Jr., Chairman
Meskwaki Nation/Sac & Fox Tribe of the Mississippi in Iowa
349 Meskwaki Road
Tama, IA 52339

Dear Chairman Buffalo:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of disposal and reuse of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois. With this mailing, the Army is initiating government-to-government consultation for this proposed action in compliance with Section 106 of the National Historic Preservation Act.

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Sincerely,



Cathy M. Collins
Installation Manager

Enclosures

cc:
Mr. William (Todd) Knuth, USACE, Louisville District, SVADA Office
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Dr. Thomas Lineer, HQDA ACSIM, BRAC Program Manager

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

Installation Manager 20 February 2020

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Johnathan Buffalo, Historic Preservation Director
Meskwaki Nation/Sac & Fox Tribe of the Mississippi in Iowa
349 Meskwaki Road
Tama, IA 52339

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Cathy M. Collins
Installation Manager

Enclosures

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Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Dr. Thomas Lineer, HQDA ACSIM, BRAC Program Manager

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

Installation Manager 20 February 2020

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Douglas Lankford, Chief
Miami Tribe of Oklahoma
PO Box 1326
Miami, OK 74355

Dear Chief Lankford:

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Cathy M. Collins
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Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Dr. Thomas Lineer, HQDA ACSIM, BRAC Program Manager

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

Installation Manager 20 February 2020

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Ms. Diane Hunter, THPO
Miami Tribe of Oklahoma
PO Box 1326
Miami, OK 74355

Dear Ms. Hunter:

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SVADA is in northwestern Illinois along the Mississippi River, about 9 miles north of the city of Savanna, Illinois off Highway 84 (Figure 1). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure, and the Depot was officially closed in 2000. Since that time, the Army has been conducting environmental remediation to clean up SVADA surplus property in preparation for transfer, and transferring property as it is cleared. The Army transferred the majority of SVADA land to two federal agencies, the U.S. Fish and Wildlife Service (USFWS) and the U.S. Army Corps of Engineers (USACE), and some to a state agency, the Illinois Department of Natural Resources (IDNR), and the remaining property to the Jo-Carroll Depot Local Redevelopment Authority (LRA).

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Preliminary background research has identified one known archaeological site near the Parcel 20 boundary. A Phase I archaeological survey of LRA Parcel 20 is scheduled to be completed in 2020. We respectfully request any information you may have concerning Native American Resources or properties of religious, traditional, or cultural significance that could be affected by the proposed action on LRA Parcel 20.

If you wish to participate in the consultation for this action, please contact me at cathleen.m.collins.civ@mail.mil or at 815-273-8312. So that this process can continue to move forward, we would appreciate hearing from you within 30 calendar days of receipt of this letter. We will provide to you an electronic copy or weblink to the EA and the archaeological survey when they are available for your review and comment, or printed copies upon request.

Sincerely,



Cathy M. Collins
Installation Manager

Enclosures

cc:
Mr. William (Todd) Knuth, USACE, Louisville District, SVADA Office
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Dr. Thomas Lineer, HQDA ACSIM, BRAC Program Manager

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

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

Installation Manager 20 February 2020

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Geoffrey Standing Bear, Principal Chief
Osage Nation
627 Grandview Ave.
Pawhuska, OK 74056

Dear Principal Chief Standing Bear:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of disposal and reuse of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois. With this mailing, the Army is initiating government-to-government consultation for this proposed action in compliance with Section 106 of the National Historic Preservation Act.

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Sincerely,



Cathy M. Collins
Installation Manager

Enclosures

cc:
Mr. William (Todd) Knuth, USACE, Louisville District, SVADA Office
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Dr. Thomas Lineer, HQDA ACSIM, BRAC Program Manager

DEPARTMENT OF THE ARMY
SAVANNA army depot activity
18935 B STREET
SAVANNA IL 61074

REPLY TO ATTENTION OF:

Installation Manager 20 February 2020

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Dr. Andrea Hunter, THPO
Osage Nation
627 Grandview Ave.
Pawhuska, OK 74056

Dear Dr. Hunter:

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Sincerely,



Cathy M. Collins
Installation Manager

Enclosures

cc:
Mr. William (Todd) Knuth, USACE, Louisville District, SVADA Office
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Dr. Thomas Lineer, HQDA ACSIM, BRAC Program Manager

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

Installation Manager 20 February 2020

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Edmore Green, Chairman
Sac & Fox Nation of Missouri in Kansas and Nebraska
305 N. Main St.
Reserve, KS 66434

Dear Chairman Green:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of disposal and reuse of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois. With this mailing, the Army is initiating government-to-government consultation for this proposed action in compliance with Section 106 of the National Historic Preservation Act.

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Sincerely,



Cathy M. Collins
Installation Manager

Enclosures

cc:
Mr. William (Todd) Knuth, USACE, Louisville District, SVADA Office
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Dr. Thomas Lineer, HQDA ACSIM, BRAC Program Manager

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

Installation Manager 20 February 2020

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Ms. Kay Rhoads, Principal Chief
Sac & Fox Nation, Oklahoma
920883 South Highway 99, Building A
Stroud, OK 74079

Dear Principal Chief Rhoads:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of disposal and reuse of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois. With this mailing, the Army is initiating government-to-government consultation for this proposed action in compliance with Section 106 of the National Historic Preservation Act.

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Sincerely,



Cathy M. Collins
Installation Manager

Enclosures

cc:
Mr. William (Todd) Knuth, USACE, Louisville District, SVADA Office
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Dr. Thomas Lineer, HQDA ACSIM, BRAC Program Manager

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

Installation Manager 20 February 2020

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Ms. Sandra Massey, THPO
Sac & Fox Nation, Oklahoma
920883 South Highway 99, Building A
Stroud, OK 74079

Dear Ms. Massey:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of disposal and reuse of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois. With this mailing, the Army is initiating government-to-government consultation for this proposed action in compliance with Section 106 of the National Historic Preservation Act.

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Cathy M. Collins
Installation Manager

Enclosures

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Mr. William (Todd) Knuth, USACE, Louisville District, SVADA Office
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Dr. Thomas Lineer, HQDA ACSIM, BRAC Program Manager

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

Installation Manager 20 February 2020

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Frank White, Chairman
Winnebago Tribe of Nebraska
PO Box 687
Winnebago, NE 68071-0687

Dear Chairman White:

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Cathy M. Collins
Installation Manager

Enclosures

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Mr. William (Todd) Knuth, USACE, Louisville District, SVADA Office
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Dr. Thomas Lineer, HQDA ACSIM, BRAC Program Manager

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

Installation Manager 20 February 2020

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Ms. Emily DeLeon, THPO
Winnebago Tribe of Nebraska
PO Box 687
Winnebago, NE 68071-0687

Dear Ms. DeLeon:

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Installation Manager

Enclosures

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Mr. William (Todd) Knuth, USACE, Louisville District, SVADA Office
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Dr. Thomas Lineer, HQDA ACSIM, BRAC Program Manager

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@winnebagotribe.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

Appendix G2. 2023 Coordination and Consultation

Enclosures are provided only for the first letter.

Responses received follow the letter sent.

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Kraig McPeek, Field Office Supervisor
USFWS, Illinois-Iowa Ecological Services Field Office
1511 47th Ave.
Moline, IL 61265

Dear Mr. McPeek:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of the Army's primary action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and the local redevelopment authority's (LRA's) secondary action of reuse of the parcel. The Army originally initiated consultation for this proposed action with you in February 2020, but the project was put on hold while the LRA developed its reuse plan. The LRA, referred to as the Jo-Carroll Depot LRA, now has developed specific plans for reuse. The Army is reinitiating consultation with you on this action for resources under your purview.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, Illinois (see Enclosure 1 location map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure, and the Depot was officially closed in 2000. Since that time, the Army has been conducting environmental remediation at SVADA to clean up surplus property in preparation for transfer and transferring property as it is cleared. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the Jo-Carroll Depot LRA. The land transferred to the LRA for redevelopment is called the Savanna Industrial Park (SIP).

In 2016, the USFWS withdrew its interest in a 132-acre parcel of land at the southern end of SVADA (formerly known as Parcel FWS 5). The Army officially identified the parcel as surplus in January 2018 and is considering transferring it to the Jo-Carroll Depot LRA. Earlier in 2023, the LRA finalized a reuse plan for the parcel, which has been redesignated LRA Parcel 20. The LRA presents three conceptual reuse alternatives for developing LRA Parcel 20 in its plan. The LRA's primary focus is on no-cost economic development conveyance, including commercial and industrial development under each alternative. 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. The LRA reuse plan is available at

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https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-1689879402.pdf, and the appendices to the plan are available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-appendices-1689879402.pdf.

LRA Parcel 20 is undeveloped land in Carroll County, Illinois (see the Enclosure 2 map). The parcel borders, but is not in, the Upper Mississippi River National Wildlife and Fish Refuge (see the Enclosure 3 map). The parcel is bordered by the Apple River, a tributary of the Mississippi River, on the east and south; the Mississippi River on the west; Vincent Road and Rofsteck Road on the northwest; and Crim Road on the north. The SIP is adjacent to LRA Parcel 20 to the northwest. The parcel includes low-lying areas associated with the Apple River and Commander's Pond (formerly known as Ordnance School Lake). An active Burlington Northern Santa Fe Railway line bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by LRA Parcel 20, also is not part of the parcel to be transferred.

If you have input regarding resources of concern to your agency or any questions concerning this BRAC action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter. We will provide you with an electronic copy or weblink to the EA when it is available for public review and comment.

Sincerely,

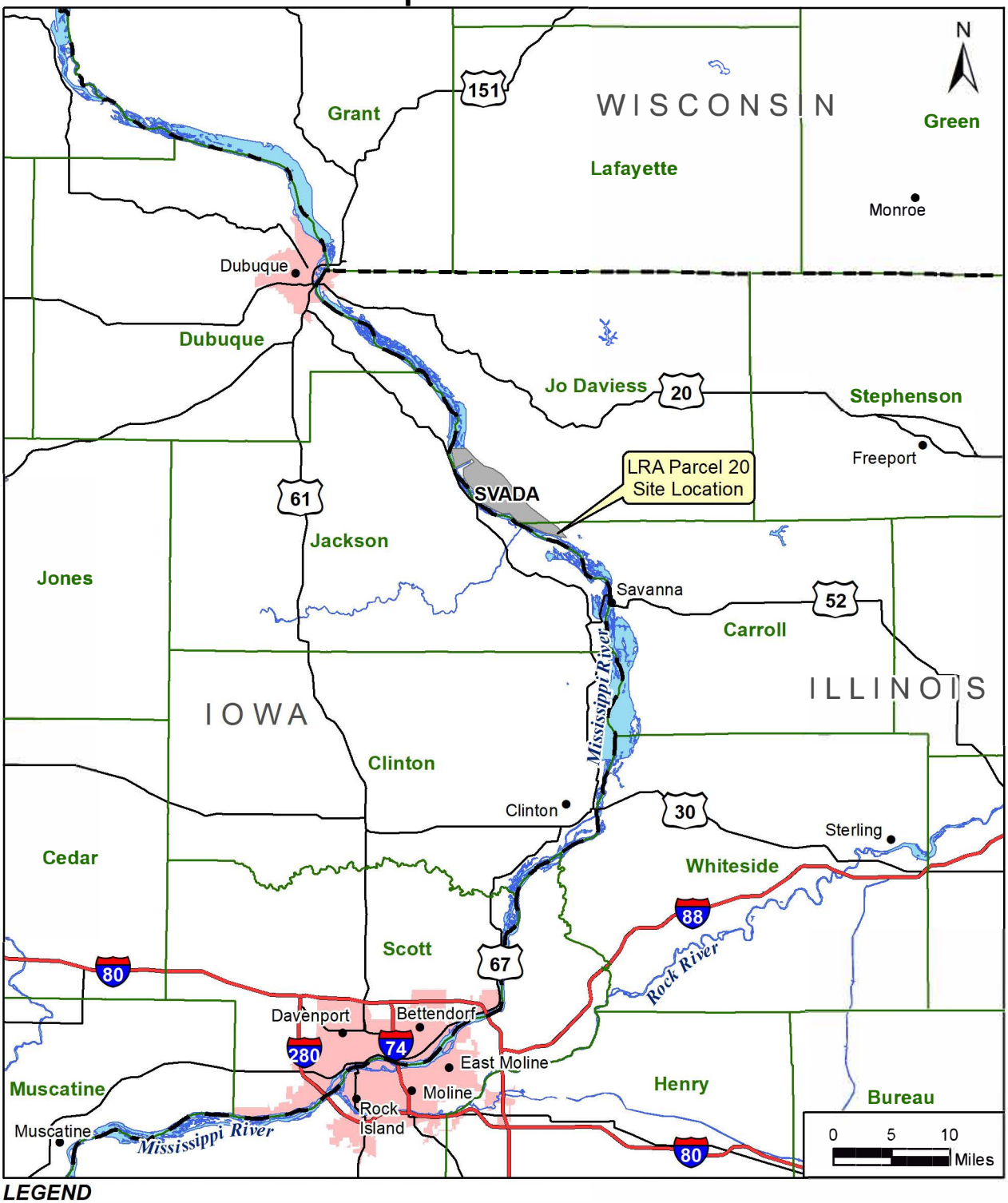
LINEER.THOMAS.A LDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2023.11.27 12:09:39 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

Enclosure 1: Location Map



LEGEND

- State Boundary
- County Boundary
- Interstate Highway
- U.S. Route
- Urban Area
- Surface Water

Enclosure 2: Site Map



LEGEND

Parcel Boundary

Note: Boundaries are approximate.

Enclosure 3: Map of USFWS UMRNWFR



Note: Boundaries are approximate.

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 my 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 sheepnose mussel (*Plethobasus cyphyus*). 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

Sheepnose: https://www.fws.gov/species/sheepnose-plethobasus-cyphyus

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 McPeek
Field Office Supervisor
Illinois-Iowa Field Office

cc:
(USFWS) Ed Britton, Sabrina Chandler
(USACE) Joe Lundh, David Reynolds, Jodi Creswell, Matthew Zehr

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Ed Britton, District Manager
USFWS, Upper Mississippi River National Wildlife and Fish Refuge, Savanna District Office
7071 Riverview Rd.
Thomson, IL 61285

Dear Mr. Britton:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of the Army's primary action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and the local redevelopment authority's (LRA's) secondary action of reuse of the parcel. The Army originally initiated consultation for this proposed action with you in February 2020, but the project was put on hold while the LRA developed its reuse plan. The LRA, referred to as the Jo-Carroll Depot LRA, now has developed specific plans for reuse. The Army is reinitiating consultation with you on this action for resources under your purview.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, Illinois (see Enclosure 1 location map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure, and the Depot was officially closed in 2000. Since that time, the Army has been conducting environmental remediation at SVADA to clean up surplus property in preparation for transfer and transferring property as it is cleared. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the Jo-Carroll Depot LRA. The land transferred to the LRA for redevelopment is called the Savanna Industrial Park (SIP).

In 2016, the USFWS withdrew its interest in a 132-acre parcel of land at the southern end of SVADA (formerly known as Parcel FWS 5). The Army officially identified the parcel as surplus in January 2018 and is considering transferring it to the Jo-Carroll Depot LRA. Earlier in 2023, the LRA finalized a reuse plan for the parcel, which has been redesignated LRA Parcel 20. The LRA presents three conceptual reuse alternatives for developing LRA Parcel 20 in its plan. The LRA's primary focus is on no-cost economic development conveyance, including commercial and industrial development under each alternative. 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. The LRA reuse plan is available at

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https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-1689879402.pdf, and the appendices to the plan are available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-appendices-1689879402.pdf.

LRA Parcel 20 is undeveloped land in Carroll County, Illinois (see the Enclosure 2 map). The parcel borders, but is not in, the Upper Mississippi River National Wildlife and Fish Refuge (see the Enclosure 3 map). The parcel is bordered by the Apple River, a tributary of the Mississippi River, on the east and south; the Mississippi River on the west; Vincent Road and Rofsteck Road on the northwest; and Crim Road on the north. The SIP is adjacent to LRA Parcel 20 to the northwest. The parcel includes low-lying areas associated with the Apple River and Commander's Pond (formerly known as Ordnance School Lake). An active Burlington Northern Santa Fe Railway line bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by LRA Parcel 20, also is not part of the parcel to be transferred.

If you have input regarding resources of concern to your agency or any questions concerning this BRAC action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter. We will provide you with an electronic copy or weblink to the EA when it is available for public review and comment.

Sincerely,

LINEER.THOMAS.A LDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2023.11.27 12:09:39 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

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 McPeek, 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

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.

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

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.

Page 16, Section 3.8.7 – 2018 Unionid Survey: "EcoAnalysts 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."

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 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.

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.

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.

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,

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

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Ms. Krystle McClain, NEPA Program Supervisor
US EPA Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Dear Ms. McClain:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of the Army's primary action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and the local redevelopment authority's (LRA's) secondary action of reuse of the parcel. The Army originally initiated consultation for this proposed action with you in February 2020, but the project was put on hold while the LRA developed its reuse plan. The LRA, referred to as the Jo-Carroll Depot LRA, now has developed specific plans for reuse. The Army is reinitiating consultation with you on this action for resources under your purview.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, Illinois (see Enclosure 1 location map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure, and the Depot was officially closed in 2000. Since that time, the Army has been conducting environmental remediation at SVADA to clean up surplus property in preparation for transfer and transferring property as it is cleared. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the Jo-Carroll Depot LRA. The land transferred to the LRA for redevelopment is called the Savanna Industrial Park (SIP).

In 2016, the USFWS withdrew its interest in a 132-acre parcel of land at the southern end of SVADA (formerly known as Parcel FWS 5). The Army officially identified the parcel as surplus in January 2018 and is considering transferring it to the Jo-Carroll Depot LRA. Earlier in 2023, the LRA finalized a reuse plan for the parcel, which has been redesignated LRA Parcel 20. The LRA presents three conceptual reuse alternatives for developing LRA Parcel 20 in its plan. The LRA's primary focus is on no-cost economic development conveyance, including commercial and industrial development under each alternative. 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. The LRA reuse plan is available at

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https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-1689879402.pdf, and the appendices to the plan are available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-appendices-1689879402.pdf.

LRA Parcel 20 is undeveloped land in Carroll County, Illinois (see the Enclosure 2 map). The parcel borders, but is not in, the Upper Mississippi River National Wildlife and Fish Refuge (see the Enclosure 3 map). The parcel is bordered by the Apple River, a tributary of the Mississippi River, on the east and south; the Mississippi River on the west; Vincent Road and Rofsteck Road on the northwest; and Crim Road on the north. The SIP is adjacent to LRA Parcel 20 to the northwest. The parcel includes low-lying areas associated with the Apple River and Commander's Pond (formerly known as Ordnance School Lake). An active Burlington Northern Santa Fe Railway line bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by LRA Parcel 20, also is not part of the parcel to be transferred.

If you have input regarding resources of concern to your agency or any questions concerning this BRAC action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter. We will provide you with an electronic copy or weblink to the EA when it is available for public review and comment.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2023.11.27 12:09:39 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

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 fleet[1] 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 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 Recommendations[3] 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 Cold [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 Cold [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 CO_2 are also relevant when assessing the climate damages resulting from GHG emissions. The social cost of carbon (SC-CO_2), social cost of methane (SC-CH_4), and social cost of nitrous oxide (SC-N_2O) can collectively be referenced as the SC-GHG.

emission reduction goals[11] 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 CO_2e using Global Warming Potential (GWP) metrics, and then multiplying the CO_2e tons by the SC-CO_2, is not as accurate as a direct calculation of the social costs of non-CO_2 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. Recyling 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 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 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:

- WATERS[14]: https://www.epa.gov/waterdata/waters-watershed-assessment-tracking-environmental-results-system
- Envirofacts[15]: https://www3.epa.gov/enviro/facts/multisystem.html
- EJSCREEN: https://www.epa.gov/ejscreen
- NEPAssist: 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).

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[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 Health[5], 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.

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Jay Patel, Regional Manager
Illinois EPA, Des Plaines Field/Regional Office
9511 West Harrison St.
Des Plaines, IL 60016

Dear Mr. Patel:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of the Army's primary action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and the local redevelopment authority's (LRA's) secondary action of reuse of the parcel. The LRA, referred to as the Jo-Carroll Depot LRA, now has developed specific plans for reuse. The Army is initiating consultation with you on this action for resources under your purview.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, Illinois (see Enclosure 1 location map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure, and the Depot was officially closed in 2000. Since that time, the Army has been conducting environmental remediation at SVADA to clean up surplus property in preparation for transfer and transferring property as it is cleared. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the Jo-Carroll Depot LRA. The land transferred to the LRA for redevelopment is called the Savanna Industrial Park (SIP).

In 2016, the USFWS withdrew its interest in a 132-acre parcel of land at the southern end of SVADA (formerly known as Parcel FWS 5). The Army officially identified the parcel as surplus in January 2018 and is considering transferring it to the Jo-Carroll Depot LRA. Earlier in 2023, the LRA finalized a reuse plan for the parcel, which has been redesignated LRA Parcel 20. The LRA presents three conceptual reuse alternatives for developing LRA Parcel 20 in its plan. The LRA's primary focus is on no-cost economic development conveyance, including commercial and industrial development under each alternative. 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. The LRA reuse plan is available at

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https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-1689879402.pdf, and the appendices to the plan are available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-appendices-1689879402.pdf.

LRA Parcel 20 is undeveloped land in Carroll County, Illinois (see the Enclosure 2 map). The parcel borders, but is not in, the Upper Mississippi River National Wildlife and Fish Refuge (see the Enclosure 3 map). The parcel is bordered by the Apple River, a tributary of the Mississippi River, on the east and south; the Mississippi River on the west; Vincent Road and Rofsteck Road on the northwest; and Crim Road on the north. The SIP is adjacent to LRA Parcel 20 to the northwest. The parcel includes low-lying areas associated with the Apple River and Commander's Pond (formerly known as Ordnance School Lake). An active Burlington Northern Santa Fe Railway line bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by LRA Parcel 20, also is not part of the parcel to be transferred.

If you have input regarding resources of concern to your agency or any questions concerning this BRAC action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter. We will provide you with an electronic copy or weblink to the EA when it is available for public review and comment.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2023.11.27 12:09:39 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Thomas Rivera, Regional Manager
Illinois EPA, Rockford Field/Regional Office
4302 North Main St.
Rockford, IL 61103

Dear Mr. Rivera:

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Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2023.11.27 12:09:39 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Ms. Tammy Willis, State Conservationist
NRCS Illinois State Office
2118 West Park Ct.
Champaign, IL 61821

Dear Ms. Willis:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of the Army's primary action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and the local redevelopment authority's (LRA's) secondary action of reuse of the parcel. The LRA, referred to as the Jo-Carroll Depot LRA, now has developed specific plans for reuse. The Army is initiating consultation with you on this action for resources under your purview.

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HQDA/ODCS G-9

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

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
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November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Paul Searl, District Conservationist
NRCS Mt. Carroll Service Center
807C South Clay St.
Mt. Carroll, IL 61053

Dear Mr. Searl:

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

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SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Ms. Natalie Phelps Finnie, Director
Illinois DNR
1 Natural Resources Way
Springfield, IL 62702

Dear Ms. Phelps Finnie:

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SAVANNA IL 61074

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ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Regional Manager
Illinois DNR, Region I - Northwestern Illinois Office
1510 46th Ave., Blackhawk State Historic Site
Rock Island, IL 61201

Dear Regional Manager:

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Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

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:

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 cyphyus*)[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.

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.

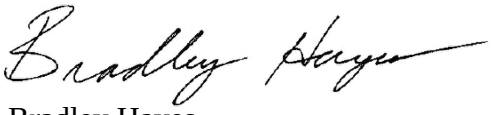
The natural resource review reflects the information existing in the Illinois Natural Heritage Database at the time of this proposal submittal and should not be regarded as a final statement on the project being considered, nor should it be a substitute for detailed site surveys or field surveys required 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.

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

[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

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Duane Ambroz, District Heritage Biologist
Illinois DNR, Div. of Natural Heritage, Lost Mound Unit
3159 Crim Dr.
Savanna, IL 61074

Dear Mr. Ambroz:

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Mr. Travis Black, Director, Inland Waterways Gateway (St. Louis)
US DOT Maritime Administration
1222 Spruce St., Suite 2.202F
St. Louis, MO 63103

Dear Mr. Black:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of the Army's primary action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and the local redevelopment authority's (LRA's) secondary action of reuse of the parcel. The LRA, referred to as the Jo-Carroll Depot LRA, now has developed specific plans for reuse. The Army is initiating consultation with you on this action for resources under your purview.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, Illinois (see Enclosure 1 location map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure, and the Depot was officially closed in 2000. Since that time, the Army has been conducting environmental remediation at SVADA to clean up surplus property in preparation for transfer and transferring property as it is cleared. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the Jo-Carroll Depot LRA. The land transferred to the LRA for redevelopment is called the Savanna Industrial Park (SIP).

In 2016, the USFWS withdrew its interest in a 132-acre parcel of land at the southern end of SVADA (formerly known as Parcel FWS 5). The Army officially identified the parcel as surplus in January 2018 and is considering transferring it to the Jo-Carroll Depot LRA. Earlier in 2023, the LRA finalized a reuse plan for the parcel, which has been redesignated LRA Parcel 20. The LRA presents three conceptual reuse alternatives for developing LRA Parcel 20 in its plan. The LRA's primary focus is on no-cost economic development conveyance, including commercial and industrial development under each alternative. 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. The LRA reuse plan is available at

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https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-1689879402.pdf, and the appendices to the plan are available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-appendices-1689879402.pdf.

LRA Parcel 20 is undeveloped land in Carroll County, Illinois (see the Enclosure 2 map). The parcel borders, but is not in, the Upper Mississippi River National Wildlife and Fish Refuge (see the Enclosure 3 map). The parcel is bordered by the Apple River, a tributary of the Mississippi River, on the east and south; the Mississippi River on the west; Vincent Road and Rofsteck Road on the northwest; and Crim Road on the north. The SIP is adjacent to LRA Parcel 20 to the northwest. The parcel includes low-lying areas associated with the Apple River and Commander's Pond (formerly known as Ordnance School Lake). An active Burlington Northern Santa Fe Railway line bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by LRA Parcel 20, also is not part of the parcel to be transferred.

If you have input regarding resources of concern to your agency or any questions concerning this BRAC action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter. We will provide you with an electronic copy or weblink to the EA when it is available for public review and comment.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2023.11.27 12:09:39 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

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

You don't often get email from travis.black@dot.gov. Learn why this is important

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

Integrity – Commitment – Service

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DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Masood Ahmad, Region 2 Engineer
Illinois DOT, Region 2, District 2
819 Depot Avenue
Dixon, IL 61021

Dear Mr. Ahmad:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of the Army's primary action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and the local redevelopment authority's (LRA's) secondary action of reuse of the parcel. The LRA, referred to as the Jo-Carroll Depot LRA, now has developed specific plans for reuse. The Army is initiating consultation with you on this action for resources under your purview.

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If you have input regarding resources of concern to your agency or any questions concerning this BRAC action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter. We will provide you with an electronic copy or weblink to the EA when it is available for public review and comment.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2023.11.27 12:09:39 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

December 14, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Ms. Charlene Falco, Environmental Specialist III
Illinois EPA (IEPA), Headquarters
1021 North Grand Avenue East
Springfield, IL 62794

Dear Ms. Falco:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of the Army's primary action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and the local redevelopment authority's (LRA's) secondary action of reuse of the parcel. The Army originally initiated consultation for this proposed action with you in February 2020, but the project was put on hold while the LRA developed its reuse plan. The LRA, referred to as the Jo-Carroll Depot LRA, now has developed specific plans for reuse. The Army is reinitiating consultation with you on this action for resources under your purview.

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Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

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

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:

- 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

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

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

December 14, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Joseph S. Lundh
USACE, Rock Island District
1500 Rock Island Avenue
Rock Island, IL 61201

Dear Mr. Lundh:

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BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

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:

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

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".

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.

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

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.

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.

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.

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.

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 McPeek is the Filed Office Supervisor. You can reach him by calling 309-757-5800.

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.

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.

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**.

Sincerely,

Jodi K. Creswell
Chief, Environmental Planning Branch

CEMVR-OD-T 21 December 2023

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.

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.

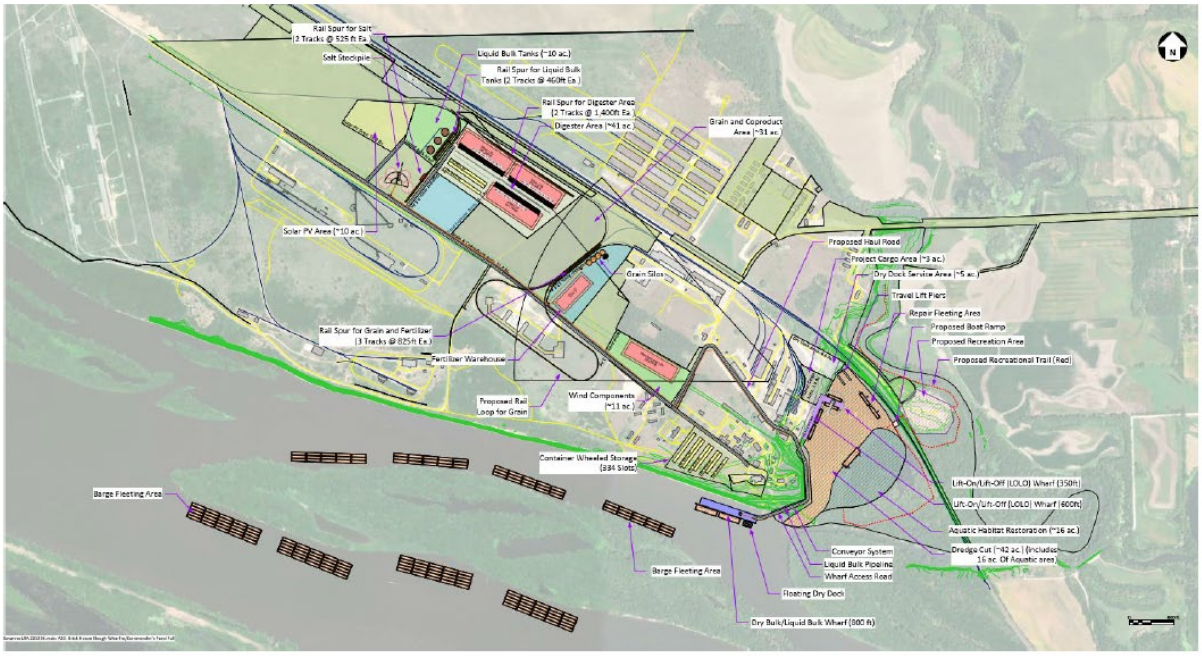


Figure 1: Figure 8-4 from the Parcel 20 Reuse Plan

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.

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.

Jarin Rudsell, P.E.
Channel Maintenance Section Chief

MEMORANDUM FOR RECORD 4 January 2024

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.

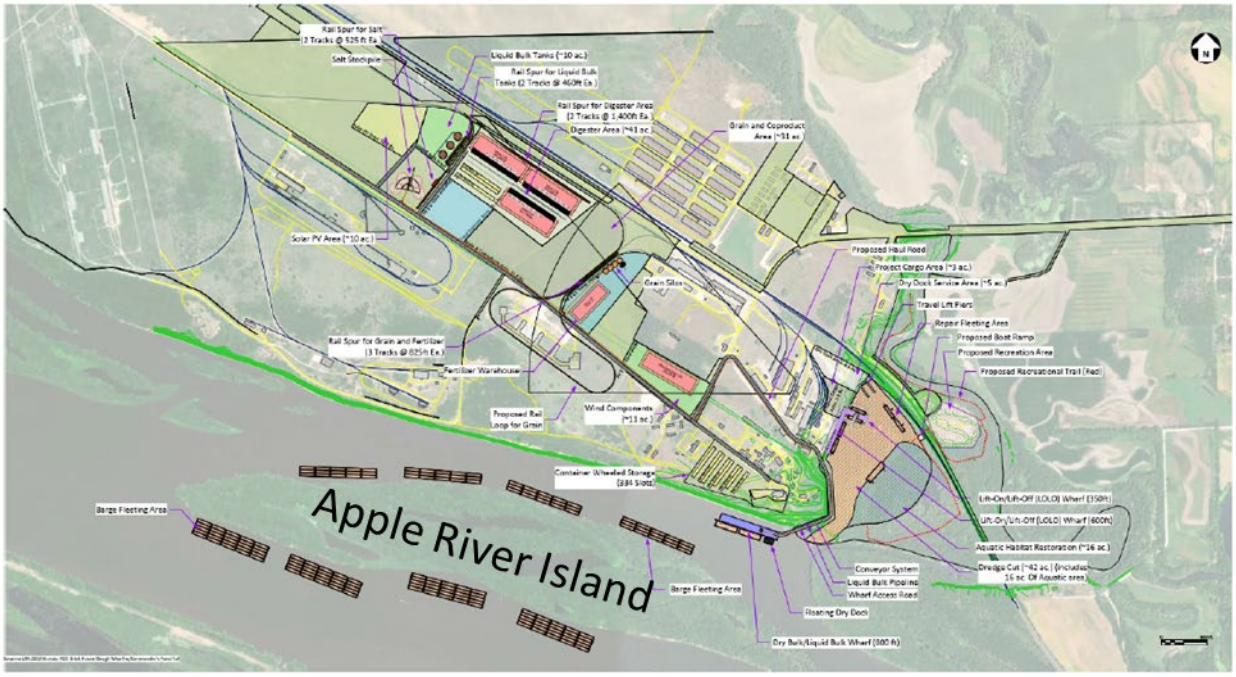


Figure 1: LRA Preferred Alternative (Figure 9-1 of Final Reuse Plan Report).

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).

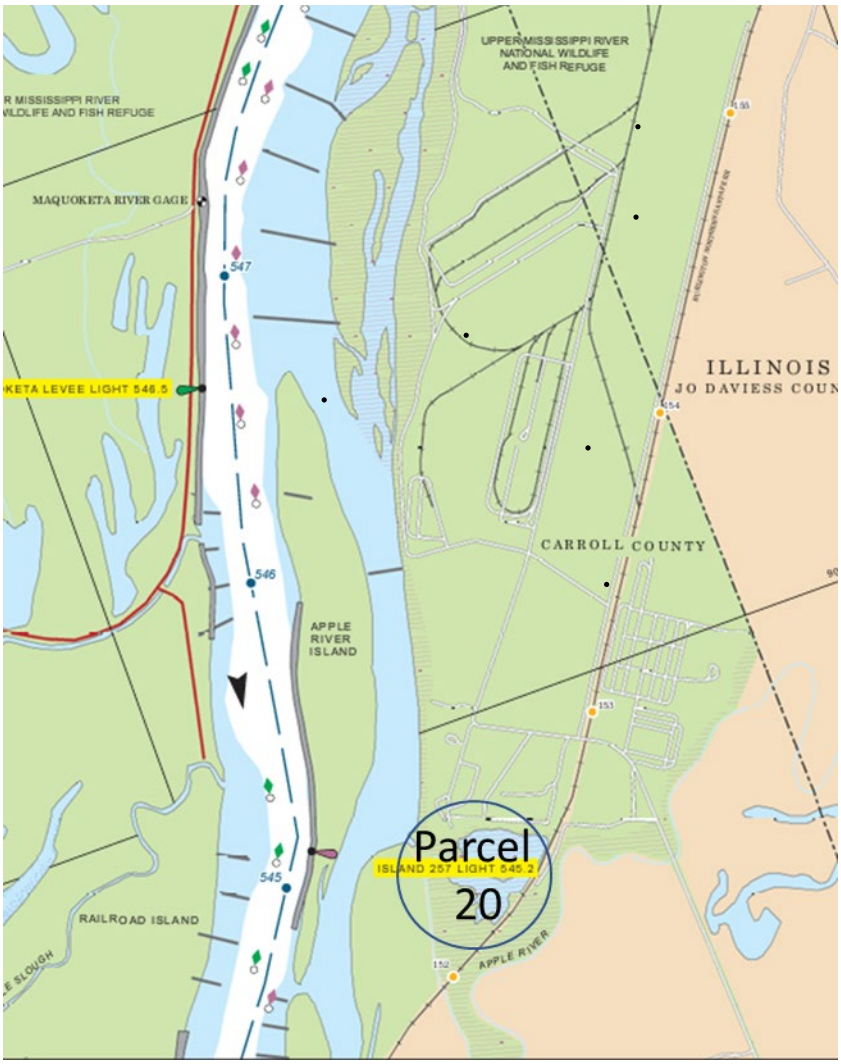


Figure 2: Portion of UMR Navigation Chart showing wingdam and closing dam locations.

d. To provide access to the proposed facilities, extensive access channel dredging (~400,00 yd^3; orange area in Figure 3) is proposed with additional dredging (~840,000 yd^3; 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.



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.

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.

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.

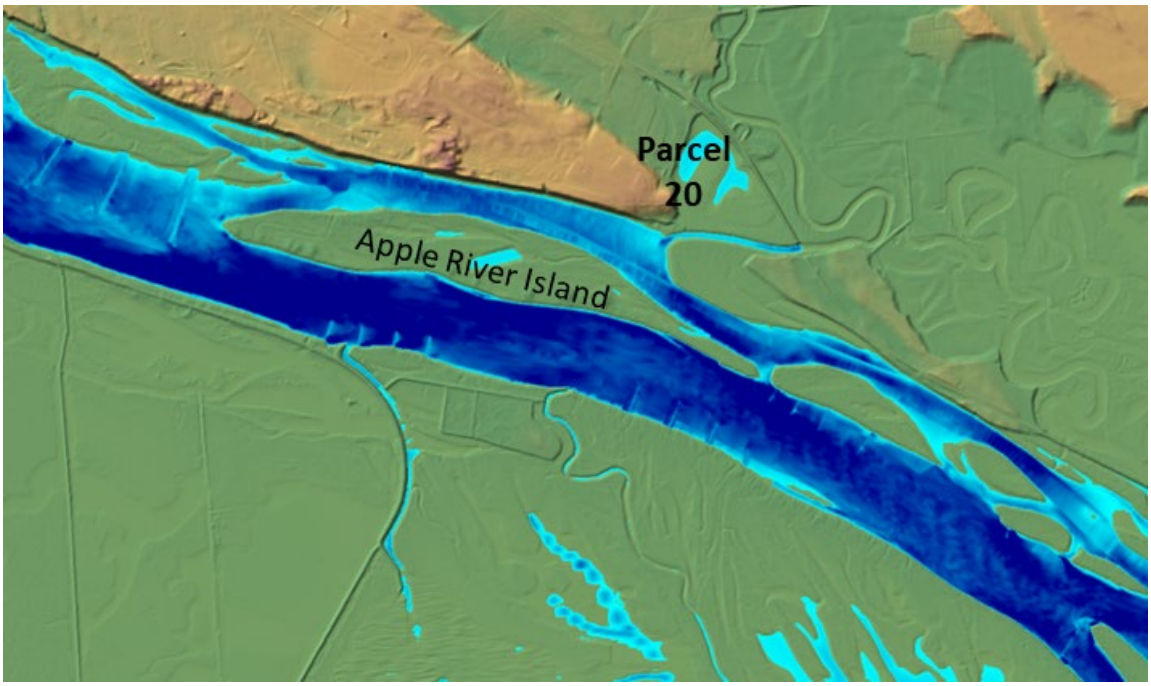


Figure 3. Topobathy data in the vicinity of the proposed project.

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.

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.

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

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.

Submitted by,

/s/

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

MEMORANDUM FOR PD 11 Jan 2024

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

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

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

December 19, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

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

Dear Ms. Goers:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of the Army's primary action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and the local redevelopment authority's (LRA's) secondary action of reuse of the parcel. The Army originally initiated consultation for this proposed action with you in February 2020, but the project was put on hold while the LRA developed its reuse plan. The LRA, referred to as the Jo-Carroll Depot LRA, now has developed specific plans for reuse. The Army is reinitiating consultation with you on this action for resources under your purview.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, Illinois (see Enclosure 1 location map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure, and the Depot was officially closed in 2000. Since that time, the Army has been conducting environmental remediation at SVADA to clean up surplus property in preparation for transfer and transferring property as it is cleared. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the Jo-Carroll Depot LRA. The land transferred to the LRA for redevelopment is called the Savanna Industrial Park (SIP).

In 2016, the USFWS withdrew its interest in a 132-acre parcel of land at the southern end of SVADA (formerly known as Parcel FWS 5). The Army officially identified the parcel as surplus in January 2018 and is considering transferring it to the Jo-Carroll Depot LRA. Earlier in 2023, the LRA finalized a reuse plan for the parcel, which has been redesignated LRA Parcel 20. The LRA presents three conceptual reuse alternatives for developing LRA Parcel 20 in its plan. The LRA's primary focus is on no-cost economic development conveyance, including commercial and industrial development under each alternative. 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. The LRA reuse plan is available at

Printed On Recycled Paper

https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-1689879402.pdf, and the appendices to the plan are available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-appendices-1689879402.pdf.

LRA Parcel 20 is undeveloped land in Carroll County, Illinois (see the Enclosure 2 map). The parcel borders, but is not in, the Upper Mississippi River National Wildlife and Fish Refuge (see the Enclosure 3 map). The parcel is bordered by the Apple River, a tributary of the Mississippi River, on the east and south; the Mississippi River on the west; Vincent Road and Rofsteck Road on the northwest; and Crim Road on the north. The SIP is adjacent to LRA Parcel 20 to the northwest. The parcel includes low-lying areas associated with the Apple River and Commander's Pond (formerly known as Ordnance School Lake). An active Burlington Northern Santa Fe Railway line bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by LRA Parcel 20, also is not part of the parcel to be transferred.

If you have input regarding resources of concern to your agency or any questions concerning this BRAC action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter. We will provide you with an electronic copy or weblink to the EA when it is available for public review and comment.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2023.11.27 12:09:39 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

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

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From: Cannella, Michelle <Michelle.Cannella@tetratech.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@tetratech.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

Direct **+1 (703) 385-1218** | Business **+1 (703) 385-6000** | michelle.cannella@tetratech.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@tetratech.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:

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

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Reid Nelson, Executive Director
Advisory Council on Historic Preservation
Attn: Office of the Executive Director
401 F Street NW, Suite 308
Washington, DC 20001

Dear Mr. Nelson:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of the Army's primary action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and the local redevelopment authority's (LRA's) secondary action of reuse of the parcel. The LRA, referred to as the Jo-Carroll Depot LRA, now has developed specific plans for reuse. The Army is initiating consultation in compliance with the August 2000 Programmatic Agreement (PA) regarding historic resources at SVADA and Section 106 of the National Historic Preservation Act (NHPA).

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, Illinois (see Enclosure 1 location map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure, and the Depot was officially closed in 2000. Since that time, the Army has been conducting environmental remediation at SVADA to clean up surplus property in preparation for transfer and transferring property as it is cleared. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the Jo-Carroll Depot LRA. The land transferred to the LRA for redevelopment is called the Savanna Industrial Park (SIP).

In 2016, the USFWS withdrew its interest in a 132-acre parcel of land at the southern end of SVADA (formerly known as Parcel FWS 5). The Army officially identified the parcel as surplus in January 2018 and is considering transferring it to the Jo-Carroll Depot LRA. Earlier in 2023, the LRA finalized a reuse plan for the parcel, which has been redesignated LRA Parcel 20. The LRA presents three conceptual reuse alternatives for redeveloping LRA Parcel 20 in its reuse plan. The LRA's primary focus is on no-cost economic development conveyance, including commercial and industrial development under each alternative. 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. The LRA reuse plan is available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-1689879402.pdf, and

the appendices to the plan are available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-appendices-1689879402.pdf.

LRA Parcel 20 is undeveloped land in Carroll County, Illinois (see the enclosures 2 and 3 maps), bordered by the Apple River, a tributary of the Mississippi River, on the east and south; the Mississippi River on the west; Vincent Road and Rofsteck Road on the northwest; and Crim Road on the north. The SIP is adjacent to LRA Parcel 20 to the northwest. The parcel includes low-lying areas associated with the Apple River and Commander's Pond (formerly known as Ordnance School Lake). An active Burlington Northern Santa Fe Railway line bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by LRA Parcel 20, also is not part of the parcel to be transferred.

A PA regarding historic resources at SVADA and executed in August 2000 among the U.S. Army, Illinois State Historic Preservation Officer (SHPO), and Advisory Council on Historic Preservation is still in effect (Enclosure 4). A complete Phase I archaeological survey of LRA Parcel 20 was conducted by Brockington Associates (Brockington) in 2020. LRA Parcel 20 has no known buildings, structures, or traditional cultural properties currently listed in the National Register of Historic Places (NRHP). Two archaeological sites within LRA Parcel 20 (sites 11-CA-1 and 11-CA-142) are identified as potentially eligible for listing in the NRHP, and a third site (Site 11-CA-149) is not eligible (see the Enclosure 5 site photo). The Illinois SHPO responded in a letter dated December 24, 2020, that the project as proposed would have no adverse effect on the two potentially eligible sites and that Site 11CA194 is not eligible for listing in the NRHP, but that any plan modifications must include SHPO notification (Enclosure 6). Brockington finalized the *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois* in January 2021.

If any sites are determined to be NRHP eligible through additional archaeological testing within LRA Parcel 20, cultural resources encumbrances in the form of a preservation covenant will apply in perpetuity, as appropriate, based on the SVADA PA and in consultation with the Illinois SHPO under Section 106 of the NHPA. See the preservation covenant in Enclosure 7.

If you have input regarding resources of concern to your agency or any questions concerning this BRAC action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you

wish to provide within 30 calendar days of receipt of this letter. We will provide you with an electronic copy or weblink to the EA when it is available for public review and comment.

Sincerely,

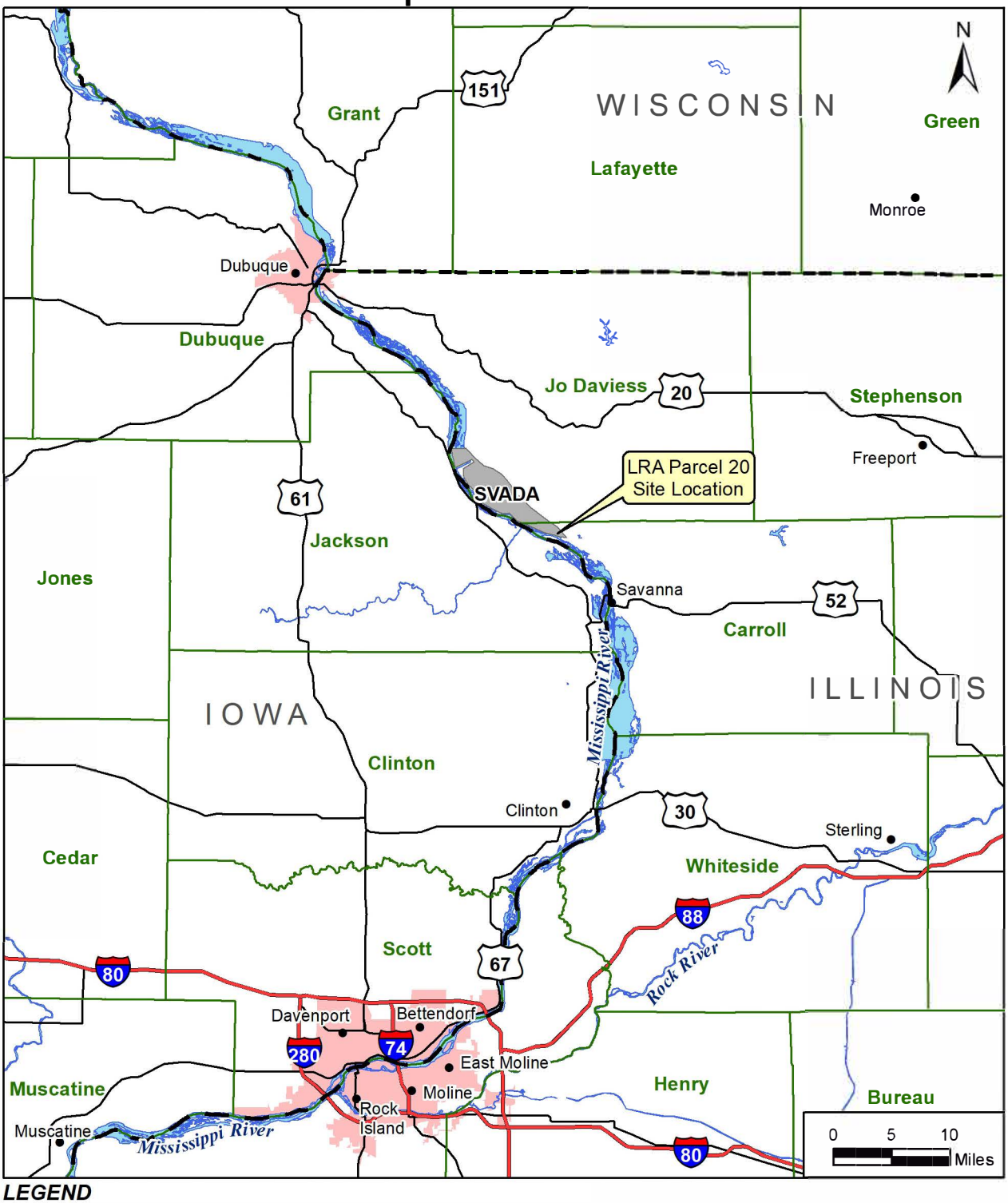
LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2023.11.27 12:08:23 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

Enclosure 1: Location Map



LEGEND

- State Boundary
- County Boundary
- Interstate Highway
- U.S. Route
- Urban Area
- Surface Water

Enclosure 2: Site Map

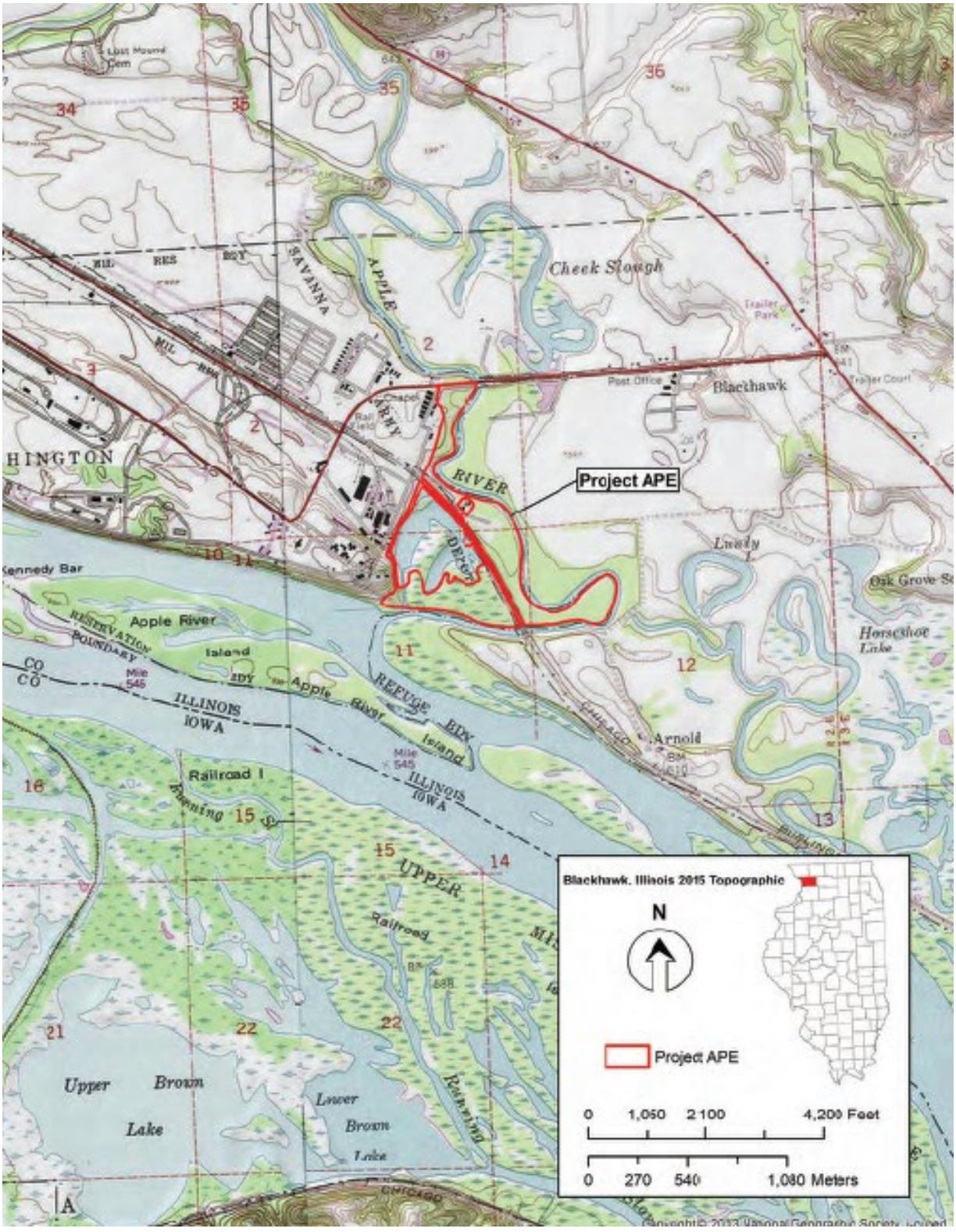


LEGEND

Parcel Boundary

Note: Boundaries are approximate.

Enclosure 3: Topographic Map



Source: Brockington and Associates, Inc. 2021. *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois*. Brockington and Associates, Inc., Atlanta, GA.

Enclosure 4: Programmatic Agreement

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

August 2000

Whereas the United States Army (Army) is responsible for implementation of applicable provisions of the Defense Base Closure and Realignment Act of 1990 (P.L. 101-510) as amended, and is proceeding with the closure of Savanna Army Depot Activity (SVDA), and consequent disposal of excess and surplus property in a manner consistent with the requirements of the applicable Defense Base Closure and Realignment Commission recommendation; and

Whereas the Army has determined that leasing, licensing and/or disposal of all or portions of SVDA, in Illinois, may have an effect upon historic properties that have been designated as eligible for listing in, the National Register of Historic Places, and has consulted with the Illinois State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation (Council) pursuant to 36 C.F.R. Part 800, regulations implementing Section 106 of the National Historic Preservation Act (16 U.S.C. Section 470(f), Section 110(f) of the same Act (16 U.S.C. Section 470h-2[f]), and Section 111 of the same Act (16 U.S.C. Section 470h-3); and

Whereas after real estate screening activities were conducted it was determined that SVDA surplus lands will be divided between the U.S. Fish and Wildlife Service, the U.S. Army Corps of Engineers, the Illinois Department of Natural Resources, and the Jo Carroll Depot Local Reuse Authority; and

Whereas the Army will conduct cultural resource inventory activities only for those lands to be transferred to non-federal entities; and

Whereas the Army has completed a number of historic architectural and archeological surveys (listed in Attachment A) to support

disposal of portions of the BRAC property to non-federal entities; and

Whereas none of the SVDA buildings to be conveyed to non-federal entities, examined by the 1997 architectural inventory study, were determined to be eligible for the National Register of Historic Places; and

Whereas a number of archeological sites located within those SVDA BRAC excess lands scheduled for disposal to non-federal entities have been determined to be eligible or potentially eligible for the National Register of Historic Places (listed in Attachment B); and

Whereas not all BRAC lands to be disposed of to non-federal entities can be surveyed for archeological resources until the lands have been examined for and, if necessary, cleared of unexploded ordnance (UXO); and

Whereas interested members of the public, including the Jo Carroll Depot Local Redevelopment Authority, and Native Americans, have been provided opportunities to comment on the effects this base closure may have on historic properties at SVDA through public hearings, consultation meetings, and other means; and

Whereas in carrying out the disposal of excess and surplus property the Army will comply with all applicable laws and regulations, including 36 C.F.R. Part 79, Curation of Federally-Owned and Administered Archeological Collections;

Whereas the Jo Carroll Depot Local Redevelopment Authority has been invited to concur in this agreement document; and

NOW, THEREFORE, the Army, the SHPO, and the Council agree that the undertaking described above shall be implemented in accordance with the following stipulations to take into account the effect of the undertaking on historic properties.

STIPULATIONS - The Army will ensure that the following measures are carried out:

I. Identification and Evaluation

A. The Army will conduct Phase I archeological site location surveys for those SVDA lands that are to be transferred to non-federal entities and that have not been previously surveyed for archeological resources (Appendix C map

displays those SVDA lands that will be surveyed for archeological resources).

B. For lands that must be examined for potential UXO contamination, archeological surveys will be conducted only after the area has been examined for UXO and has been determined as being safe for subsurface archeological testing. Due to explosive ordnance qualification requirements and safety factors, no archeologists will be made part of the actual UXO field survey and disposal teams. However, archeologists associated with the UXO contractor and the U.S. Army Corps of Engineers (USACE) will be available for consultations and to examine any archeological finds that may be made in the course of the UXO investigations. The following procedures will be followed by the UXO disposal teams that will conduct the UXO surveys.

1. Prior to the initiation of field investigations at SVDA, UXO survey personnel will receive a cultural resources orientation concerning known cultural resource sites within the project area and recognition of cultural resource artifactual materials that could be encountered by the UXO investigations.

2. UXO surveys will involve location of metallic objects by metal detectors and hand excavation of these metallic objects by UXO disposal experts. Non UXO related metallic objects and any other cultural items encountered by the investigators will be left on the ground surface adjacent to the hole from which they were removed for later examination and, if appropriate, collection during subsequent archeological surveys.

3. UXO field survey personnel will notify the SVDA BRAC Environmental Coordinator (BEC) and the contract or USACE archeologist of any cultural materials or human skeletal materials encountered during the UXO investigations. If human skeletal remains are encountered, UXO investigations will be immediately halted for that sampling grid and the SVDA BEC and USACE archeologist will make arrangements to determine the origin of the human remains and whether the requirements of the Native American Graves Protection and Repatriation Act (NAGPRA) should be enacted.

4. UXO related items encountered by the UXO disposal experts may be removed from the location where they are encountered for disposal or may be exploded *in situ*, if removal is considered to be too hazardous.

C. The Army will coordinate the findings and recommendations for all SVDA archeological surveys with the Illinois SHPO as the survey reports are completed.

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.

III. Licenses and Leases

Licenses or leases, to other than federal agencies, of historic properties will include language provided in Attachment D of this agreement as appropriate.

IV. Disposal of SVDA Properties

A. Transfer of Real Property That Does Not Contain Historic Properties

In leasing or disposing of real property and improvements--for which identification and evaluation have been completed in consultation with the SHPO--that do not contain historic properties, any portion of an historic property, archeological sites, or any portion of an archeological site, no further action is necessary under this agreement. The Army will, however, promptly notify the SHPO that such a transfer has been completed.

B. Assignments to Other Federal Agencies

In assigning historic property (ies) directly to another Federal agency by a transfer authority such as The Federal Property and Administrative Services Act of 1949, as amended (40 U.S.C. § 471 et seq.), the receiving Federal agency will be deemed responsible for compliance with 36 C.F.R. Part 800 and any other applicable state or Federal laws and regulations with respect to the maintenance and disposal of these properties. The Army will promptly notify the SHPO and Council in writing of each Federal agency that has requested and been assigned such property.

C. Public Benefit Conveyances to Non-Federal Recipients

In disposing of historic property(ies) directly to a non-Federal recipient - at the request of a sponsoring Federal agency, and pursuant to the Public Benefit Conveyance authorities contained in the Federal Property and Administrative Services Act of 1949, as amended (40 U.S.C. § 471 et seq.), and other applicable authorities - an appropriate preservation covenant (found at Attachment E) will be incorporated in the transfer instrument(s). The Army will promptly notify the SHPO and Council in writing of each such transfer of an archeological-site property.

D. Economic Development Conveyances to LRAs

In disposing of historic property(ies) to a Local Redevelopment Authority (LRA) pursuant to the Economic Development Conveyance authority contained in the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510, as amended), an appropriate preservation covenant (found at Attachment E) will be incorporated in the transfer instrument(s). The Army will promptly notify the SHPO and Council in writing of each such transfer of an archeological-site property.

E. Competitive Sales

In disposing of historic properties via a competitive sale transfer authority, the Army's bid solicitation will contain the following information:

(1) Information on the property's archeological significance, identifying elements, or other characteristics of the property that should be given special consideration in planning;

(2) Information on financial incentives for preservation of archeological properties;

(3) Information indicating that an appropriate preservation covenant will be incorporated in the instrument transferring title to the property, and that this covenant will be substantively identical to the one contained in Attachment E of this agreement (as appropriate), unless modifications are authorized pursuant to the process described in paragraph IV. G, below, and as required to accord the covenants with state law.

In developing the above information for inclusion in its initial bid solicitation document, the Army will solicit the advice and

assistance of the SHPO. The Army need not solicit such advice and assistance in preparing subsequent solicitation documents, unless such documents contain historic properties information that materially differs from that included in the initial solicitation document. The Army will notify the SHPO and Council in writing of each such transfer of an archeological-site property.

F. Negotiated Sales

In disposing of historic properties via a negotiated sale transfer authority, the Army will provide a written document ("negotiation document") to the negotiating party that sets forth the same information described in subparagraphs IV. E (1), (2) & (3), above. In developing this information for inclusion in the negotiation document to be provided to the initial negotiating party, the Army will solicit the advice and assistance of the SHPO. The Army need not solicit such advice and assistance in preparing negotiation documents for subsequent negotiating parties, unless such documents contain historic properties information that materially differs from that included in the document provided to the initial negotiating party. The Army will notify the SHPO and Council in writing of each such transfer of an archeological-site property.

G. Covenant Modification to Facilitate Transfer

If the Army cannot transfer the property or properties that contain National Register eligible archeological sites pursuant to the provisions set forth in paragraphs IV. C, D, E, and F above, then the Army will consult with the SHPO, the Council, and (with respect to transfers pursuant to paragraphs IV. C, D, and F) the prospective transferee(s) to determine appropriate modifications to the preservation covenant contained in Attachment E that are necessary in order to complete transfer of the property(ies) within established disposal timelines. Such modifications shall be limited to those that are reasonably necessary in order to effect transfer of, or effectively market, the concerned property within established timelines.

V. Environmental Remediation

A. UXO identification and removal will be handled as described in Stipulation I.B of this agreement document. As they are developed, the plans for other proposed environmental remediation activities will be reviewed by the SVDA BRAC Environmental Coordinator (BEC) to identify any effects to historic properties, known or yet to be discovered. If the Army determines that a proposed remediation activity will take place

less than 100 feet from a historic property and has the potential to affect that property, the Army will consult with the SHPO to determine what steps, if any, should be taken with respect to those effects.

B. Proposed remediation plans that the Army determines may affect historic properties will be submitted to the SHPO for review and comment in accordance with the following procedures:

(1) Proposed remediation plans or supplemental documentation furnished by the Army will provide descriptions of any potential conflicts between remediation and preservation of historic properties;

(2) In situations where the Army determines that there is an immediate threat to human health, safety, or the environment, and that remediation must proceed without first taking steps to preserve historic properties, then the Army's reasons for so determining will be fully described;

(3) In situations where the Army determines that there is not an immediate threat to human health, safety, or the environment, and that implementation of its proposed remediation plan will result in the destruction or substantial alteration of any historic property, then the Army shall either modify its remediation plan to avoid the adverse effect or implement data recovery and/or recordation in consultation with the SHPO, taking into account health and safety constraints inherent in properties containing hazardous materials, resource availability, and any other relevant constraints.

VI. Anti-Deficiency Act

The stipulations of this agreement are subject to the provisions of the Anti-Deficiency Act. If compliance with the Anti-Deficiency Act alters or impairs the Army's ability to implement the stipulations of this agreement, the Army will consult in accordance with the amendment and termination procedures found at Sections IX. and X. of this agreement.

VII. Status Reports

Until such time as all SVDA archeological properties have been transferred from Army control in accordance with the terms of this agreement, the Army will provide an annual status report

to the Council and Illinois SHPO to review implementation of the terms of this agreement and to determine whether amendments are needed. If amendments are needed, the signatories to this agreement will consult, in accordance with Stipulation IX. of this agreement, to make such revisions.

VIII. Dispute Resolution

A. Should the Illinois SHPO and/or the Council object within thirty (30) days to any plans or other documents provided by the Army or others for review pursuant to this agreement, or to any actions proposed or initiated by the Army pursuant to this agreement, the Army shall consult with the objecting party to resolve the objection. If the Army determines that the objection cannot be resolved, the Army shall forward all documentation relevant to the dispute to the Council. Within thirty (30) days after receipt of all pertinent documentation, the Council will either:

(1) Provide the Army with recommendations, which the Army will take into account in reaching a final decision regarding the dispute; or

(2) Notify the Army that it will comment pursuant to 36 C.F.R. 800.7(c), and proceed to comment.

Any Council comment will be taken into account by the Army in accordance with 36 C.F.R. 800.7(c)(4) with reference to the subject of the dispute.

B. Any recommendations or comment provided by the Council pursuant to Stipulation VIII. A above will pertain only to the subject of the dispute; the Army's responsibility to carry out all other actions under this agreement that are not the subjects of the dispute will remain unchanged.

C. At any time during implementation of the measures stipulated in this agreement by the Army, if an objection to any such measure or its manner of implementation is raised by interested persons, then the Army shall consider the objection and consult, as appropriate, with the objecting party, the SHPO, and the Council to attempt to resolve the objection.

IX. Amendments

A. The Army, Illnois SHPO, and/or Council may request that this PA be revised, whereby the parties will consult to consider whether such revision is necessary.

B. If it is determined that revisions to this PA are necessary, then the Army, the Council, and the SHPO shall consult pursuant to 36 C.F.R. 800.6(c)(7), as appropriate, to make such revisions. Except that, reviewing parties must comment on, or signify their acceptance of, the proposed changes to the PA in writing within 30 days of their receipt.

X. Termination of Agreement

A. The Army, Illnois SHPO, and/or Council may terminate this PA by providing thirty (30) days written notice to the other signatory parties. During the period after notification and prior to termination the Army, the Council, and the SHPO will consult to seek agreement on amendments or other actions that would avoid termination. In the event of termination, the Army will comply with 36 CFR Part 800.6(c)(8) with regard to individual undertakings associated with the BRAC disposal action.

Execution and implementation of this PA evidences that the Army has afforded the Council a reasonable opportunity to comment on the closure and disposal of excess and surplus property at SVDA, and that the Army has taken into account the effects of the undertaking on historic properties. Execution and compliance with this programmatic agreement fulfills the Army's Section 106 responsibilities regarding the closure and disposal of Savanna Army Depot Activity.

DEPARTMENT OF THE ARMY

By: Charles S. Mahan Jr. Date: 21 August 2000
Charles S. Mahan, Jr.
Major General, USA
Chief of Staff

ILLINOIS STATE HISTORIC PRESERVATION OFFICER

By: _____ Date: 9-20-00
Anne Haaker
Deputy State Historic Preservation Officer

ADVISORY COUNCIL ON HISTORIC PRESERVATION

By: John M. Fowler Date: 10/13/00
John Fowler
Executive Director

Concur:

JO CARROLL DEPOT LOCAL REDEVELOPMENT AUTHORITY

By: _____ Date: 9-25-00
John A. Morehead
Executive Director

ATTACHMENT A

Bibliography of Cultural Resource Studies Conducted to Support BRAC Disposal of Savanna Army Depot Activity Properties

Ball, Donald B.
1997 *A Cultural Resources Reconnaissance of A Proposed 164 Acre Prison Site, Savanna Army Depot Activity, Jo Daviess County, Illinois*. Report prepared by the U.S. Army Corps of Engineers, Louisville District.

Hardlines
1997 *Architectural Inventory of a Portion of the Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois*. A report prepared for the U.S. Army Corps of Engineers, Louisville District by Hardlines: Design and Delineation, a subcontractor of International Technology, Inc.

Miller, Orloff G., Sarah Adams, and E. Jeanne Harris
1999 *Phase I Archaeological Survey of ca. 212 Acres (85.8 hectares) at the Savanna Army Depot Activity, Carroll County Illinois*. A report prepared for the U.S. Army Corps of Engineers, Louisville District by Gray and Pape, Inc.

Whitman, Linda G. and Nathan Young
1998 *Phase I Literature Review and Archaeological Cultural Resource Survey of 210 Acres (85 ha) at Savanna Army Depot Activity, Carroll County, Illinois*. A report prepared for the U.S. Army Corps of Engineers, Louisville District by ASC Group, Inc., a subcontractor of the IT Corporation.

ATTACHMENT B

Savanna Army Depot Activity, Illinois
Known Historic Properties on or Eligible for
the National Register of Historic Places
that will be Disposed of to Non-Federal Entities

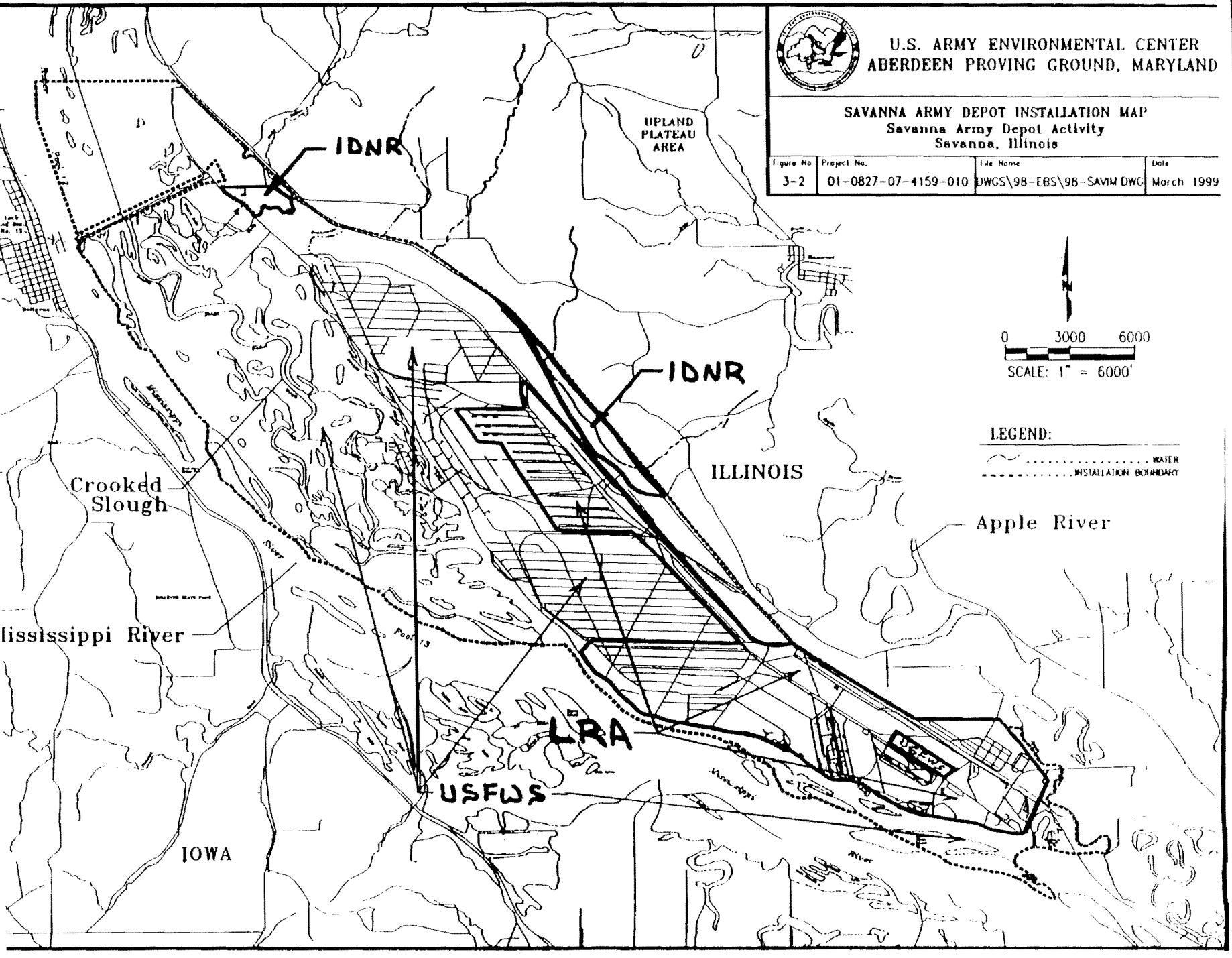
11CA1*
11CA2
11CA3+
11CA139*
11CA142
11CA143*
11CA147
11CA148
11CA149

* Lands making up this archeological site lie within two BRAC disposal parcels, one to be acquired by the local reuse authority and the other by the U.S. Fish and Wildlife Service.

+ The mounds formerly associated with this site have been destroyed, but the site may still have the potential to possess subsurface burials.

ATTACHMMENT C

Map Displaying the Location of
Savanna Army Depot Activity Lands to be
Transferred to Federal and
Non-Federal Entities


U.S. ARMY ENVIRONMENTAL CENTER
ABERDEEN PROVING GROUND, MARYLAND
SAVANNA ARMY DEPOT INSTALLATION MAP
Savanna Army Depot Activity
Savanna, Illinois
Figure No 3-2
Project No. 01-0827-07-4159-010
File Name DWGS\98-EBS\98-SAVIM.DWG
Date March 1999
IDNR
UPLAND PLATEAU AREA
IDNR
ILLINOIS
Crooked Slough
Apple River
lississippi River
Pool 13
LRA
USFWS
IOWA
0 3000 6000
SCALE: 1" = 6000'
LEGEND:
WATER
INSTALLATION BOUNDARY

ATTACHMENT D - **Language to be included in lease and license agreements when archeological sites are present.**

Archeological Property(ies) Lessee (License) Language

Archeological property(ies)XXX is/are (eligible for inclusion in/listed in) the National Register of Historic Places. The Lessee (Licensee) shall ensure that the property(ies) remain(s) undisturbed. The Lessee (Licensee) will notify the Army of any proposed ground disturbance to the archeological property prior to undertaking said ground disturbance. Notification will include a detailed description of the proposed undertaking. If the Army does not object to the proposal within 30 days of receipt of such notification and adequate supporting documentation, the Army will, with the assistance of the Lessee (Licensee), initiate consultation with the Illinois SHPO in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, "Protection of Historic Properties" (36 C.F.R. Part 800). The Lessee (Licensee) will not undertake the proposed action until the Army notifies the Lessee (Licensee) that the requirements of Section 106 have been fulfilled and the Lessee (Licensee) may proceed. If the Army objects to the Lessee's (Licensee's) proposed ground disturbance, the Lessee shall not undertake the proposed action.

ATTACHMENT E: STANDARD PRESERVATION COVENANT FOR CONVEYANCE OF PROPERTY THAT INCLUDES ARCHEOLOGICAL SITES

1. In consideration of the conveyance of the real property that includes the [official number(s) designation of archeological site(s)] located in the County of [name of county], Illinois, which is more fully described as [insert legal description], [Name of property recipient] hereby covenants on behalf of [himself/herself/itself], [his/her/its] heirs, successors, and assigns at all times to the Illinois State Historic Preservation Officer (SHPO), to maintain and preserve [official number(s) designation of archeological site(s)], in accordance with the provisions of paragraphs 2 through 11 of this covenant.

2. (Name of property recipient) will notify the Illinois SHPO in writing prior to undertaking any disturbance of the ground surface or any other action on [official number(s) designation of archeological site(s)] that would affect the physical integrity of this/these site(s). Such notice shall describe in reasonable detail the proposed undertaking and its expected effect on the physical integrity of [official number(s) designation of archeological site(s)].

3. Within thirty (30) calendar days of the Illinois SHPO's receipt of notification provided by (name of property recipient) pursuant to paragraph 2 of this covenant, the SHPO will respond to (name of property recipient) in writing as follows:

(a) That (name of property recipient) may proceed with the proposed undertaking without further consultation; or

(b) That (name of property recipient) must initiate and complete consultation with the Illinois SHPO before (he/she/it) can proceed with the proposed undertaking.

If the Illinois SHPO fails to respond to the (name of property recipient)'s written notice within thirty (30) calendar days of the SHPO's receipt of the same, then (name of property recipient) may proceed with the proposed undertaking without further consultation with the SHPO.

4. If the response provided to (name of property recipient) by the Illinois SHPO pursuant to paragraph 3 of this covenant requires consultation with the SHPO, then both parties will so consult in good faith to arrive at mutually-agreeable and appropriate measures that (name of property recipient) will employ to mitigate any adverse effects associated with the proposed undertaking. If the parties are unable to arrive at such mutually-agreeable mitigation measures, then (name of property recipient) shall, at a minimum, undertake recordation

for the concerned property--in accordance with the Secretary of Interior's standards for recordation and any applicable state standards for recordation, or in accordance with such other standards to which the parties may mutually agree--prior to proceeding with the proposed undertaking. Pursuant to this covenant, any mitigation measures to which (name of property recipient) and the SHPO mutually agree, or any recordation that may be required, shall be carried out solely at the expense of (name of property recipient).

5. [Name of recipient] shall make every reasonable effort to prohibit any person from vandalizing or otherwise disturbing any archeological site determined by the Illinois SHPO to be eligible for inclusion in the National Register of Historic Places. Any such vandalization or disturbance shall be promptly reported to the Illinois SHPO.

6. The Illinois SHPO shall be permitted at all reasonable time to inspect [parcel designation] in order to ascertain its condition and to fulfill its responsibilities hereunder.

7. In the event of a violation of this covenant, and in addition to any remedy now or hereafter provided by law, the Illinois SHPO may, following reasonable notice to [name of recipient], institute suit to enjoin said violation or to require the restoration of any archeological site affected by such violation.

8. [Name of recipient] agrees that the Illinois SHPO may, at its discretion, after 30 days notice to [name of recipient], convey and assign all or part of its rights and responsibilities contained in this covenant to a third party.

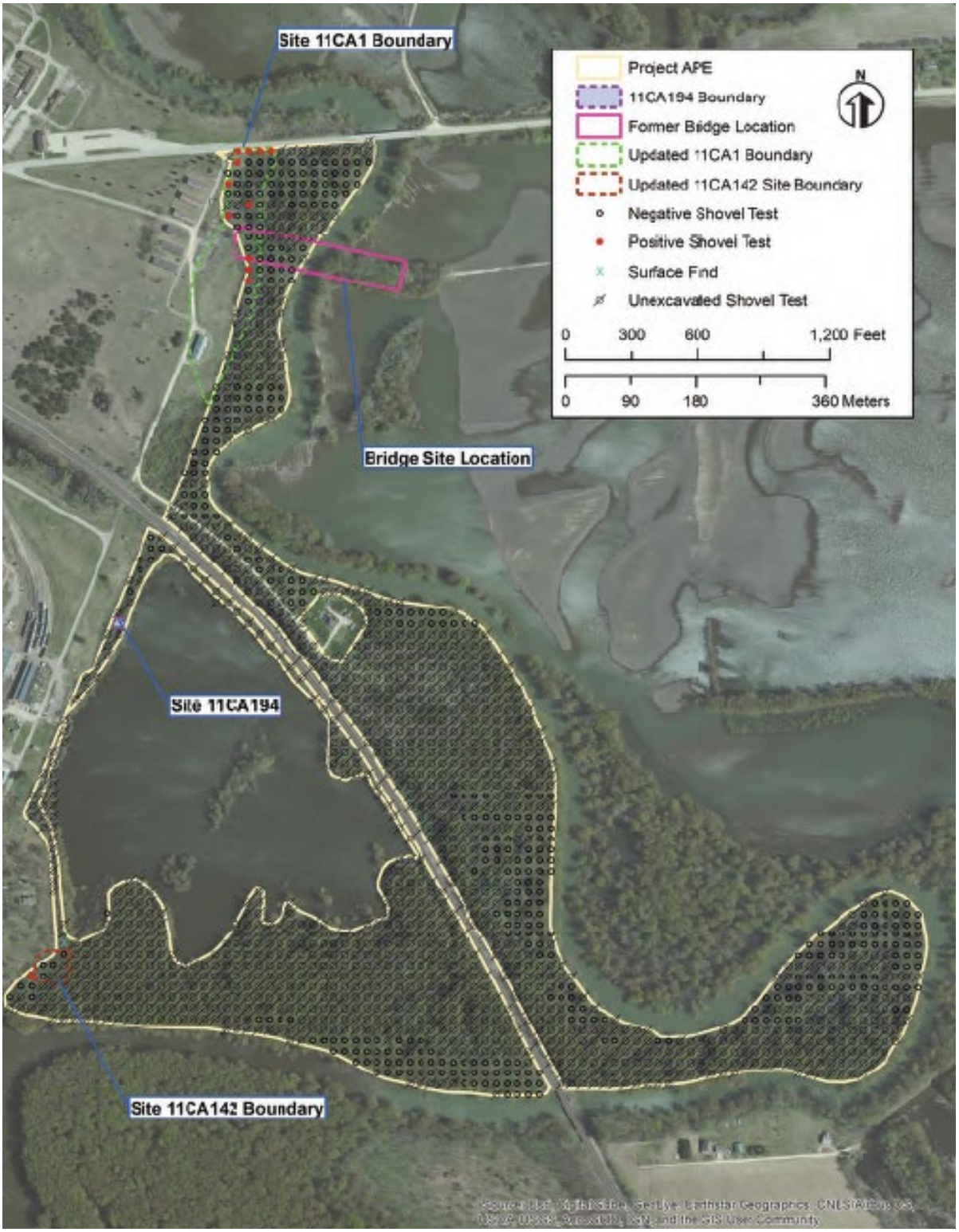
9. This covenant is binding on [name of recipient], [his/her/its] heirs, successors, and assigns in perpetuity. Restrictions, stipulations, and covenants contained herein shall be inserted by [name of recipient] verbatim or by express reference in any deed or other legal instrument by which [he/she/it] divests [himself/herself/itself] of either the fee simple title or any other lesser estate in [parcel designation] or any part thereof.

10. The failure of the Illinois SHPO to exercise any right or remedy granted under this instrument shall not have the effect of waiving or limiting the exercise of any other right or remedy or the use of such right or remedy at any other time.

11. The covenant shall be a binding servitude upon the real property that includes [official number(s) designation of archeological site(s)] and shall be deemed to run with the land. Execution of this covenant shall constitute conclusive evidence

that [name of recipient] agrees to be bound by the foregoing conditions and restrictions and to perform the obligations herein set forth.

Enclosure 5: Map of Recorded Resources in LRA Parcel 20



Source: Brockington and Associates, Inc. 2021. *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois*. Brockington and Associates, Inc., Atlanta, GA.

Enclosure 6: Illinois SHPO Phase I Review Letter, SHPO Log #005022420

ILLINOIS DEPARTMENT OF NATURAL RESOURCES

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

Carroll County
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

PLEASE REFER TO: SHPO Log #005022420

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

Enclosure 7: Preservation Covenant

PRESERVATION COVENANT
SVADA LRA Parcel 20

(held by Illinois Department of Natural Resources)

In consideration of the conveyance of certain real property, hereinafter referred to as the

SVADA LRA Parcel 20, located in Carroll County, Illinois, which is more fully describes as:

The Savanna Army Depot Activity (SVADA) local redevelopment authority (LRA) Parcel 20 at the southern end of SVADA in Carroll County, Illinois. The parcel is bounded by the Apple River to the east and south; the Mississippi River to the west; Vincent Road and Rofsteck Road to the northwest; and Crim Road to the north. The parcel is bisected from the northwest to the southeast by an active railroad line owned by the Burlington Northern Santa Fe Railway Company; the rail line is not part of the parcel to be transferred. A sewage treatment plant owned by the U.S. Army is surrounded by LRA Parcel 20, also is not part of the parcel to be transferred (Figure 1).

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.
3. Additional archaeological testing, NRHP site evaluations, and potential mitigation measures require additional Illinois SHPO consultation and Section 106 of the National Historic Preservation Act (NHPA) compliance measures, as required by law.
4. Execution of this Covenant shall include all applicable conditions, restrictions, laws, orders, and obligations set forth in the SVADA Programmatic Agreement (PA).
5. Conveyance of property that includes archaeological sites:
    a. In consideration of the conveyance of the real property, LRA Parcel 20, which includes the sites 11-CA-1 and 11-CA-142 located in Carroll County, Illinois. Jo-Carroll Depot LRA covenants on behalf of itself, its heirs, or successors, and assigns at all times to the Illinois SHPO to maintain and preserve sites 11-CA-1 and 11-CA-142, in accordance with the provisions of this Covenant.
    b. The property recipient will notify the Illinois SHPO in writing prior to any undertaking of any ground disturbance or action on sites that would affect the physical integrity of sites 11-CA-1 and 11-CA-142. Such a notice shall describe in reasonable detail the proposed undertaking and its expected effect on the physical integrity of sites 11-CA-1 and 11-CA-142.

c. Within thirty (30) calendar days of the Illinois SHPO's receipt of notification provided by the LRA, pursuant to this Covenant, the SHPO will respond to the LRA in writing as follows:
    i. That the LRA may proceed with the proposed undertaking without further consultation; or
    ii. That the LRA must initiate and complete additional consultation with the Illinois SHPO before it can proceed with the proposed undertaking; or
    iii. If the Illinois SHPO fails to respond to the LRA's written notice within thirty (30) calendar days of the SHPO's receipt of the same, then the LRA may proceed with the proposed undertaking without further consultation with the SHPO.
d. Lease and License:
    i. Archaeological sites 11-CA-1 and 11-CA-142 are potentially eligible for inclusion in the NRHP.
    ii. The Recipient/Lessee shall ensure that the sites remain undisturbed.
    iii. The Recipient/Lessee will notify the Owner of any proposed ground disturbance to the archaeological sites prior to undertaking said ground disturbance.
    iv. Notification will include a detailed description of the proposed undertaking.
    v. If the Army does not object to the proposal within thirty (30) calendar days of receipt of such notification and adequate supporting documentation, the Army will, with the assistance of the Lessee (Licensee), initiate consultation with Illinois SHPO in accordance with NHPA Section 106 and its implementing regulations, "Protection of Historic Properties" (Title 36of the Code of Federal Regulations Part 800).
    vi. The Recipient/Lessee will not undertake the proposed action until the Army notifies the Lessee (Licensee) that the requirements of Section 106 have been fulfilled and the Lessee (Licensee) may proceed.
    vii. If the Army objects to the Recipient's/Lessee's proposed ground disturbance, the Recipient/Lessee shall not undertake the proposed action.
e. The Illinois Department of Natural Resources shall be permitted at all reasonable times to inspect these archaeological sites to ascertain if the above conditions are being observed.
f. In the event of a violation of this Covenant, and in addition to any remedy now or hereafter provided by law, the Illinois Department of Natural Resources may, following reasonable notice to the Owner and Recipient/Lessee, institute suit to enjoin said violation or to require the restoration or mitigation of natural resources, archaeological sites, or structures disturbed by construction, alteration, or disturbance of the ground surface, or structure older than 50 years.
g. The Owner and Recipient/Lessee agrees that the Illinois Department of Natural Resources may at its discretion, without prior written notice to the Owner and Recipient/Lessee, convey and assign all or part of its rights and responsibilities contained herein to a third party.
h. This Covenant is binding on the Owner and Recipient/Lessee, and their successors and assignees in perpetuity. Restrictions, stipulations, and covenants contained herein shall be inserted by Owner and Recipient/Lessee verbatim or by express reference in any deed or other legal instrument by which it divests itself or either the fee simple title or any other lesser estate in this SVADA LRA Parcel 20 or any part thereof.
i. The failure of the Illinois Department of Natural Resources to exercise any right or remedy granted under this instrument shall not have the effect of waiving or limiting the exercise of any other right or remedy or the use of such right or remedy at any other time.

j. This Covenant shall be a binding servitude upon this SVADA LRA Parcel 20 and shall be deemed to run with the land. Execution of this Covenant shall constitute conclusive evidence that the United States Army and/ SVADA LRA agree to be bound by the foregoing conditions and restrictions and to perform the obligations herein set forth.

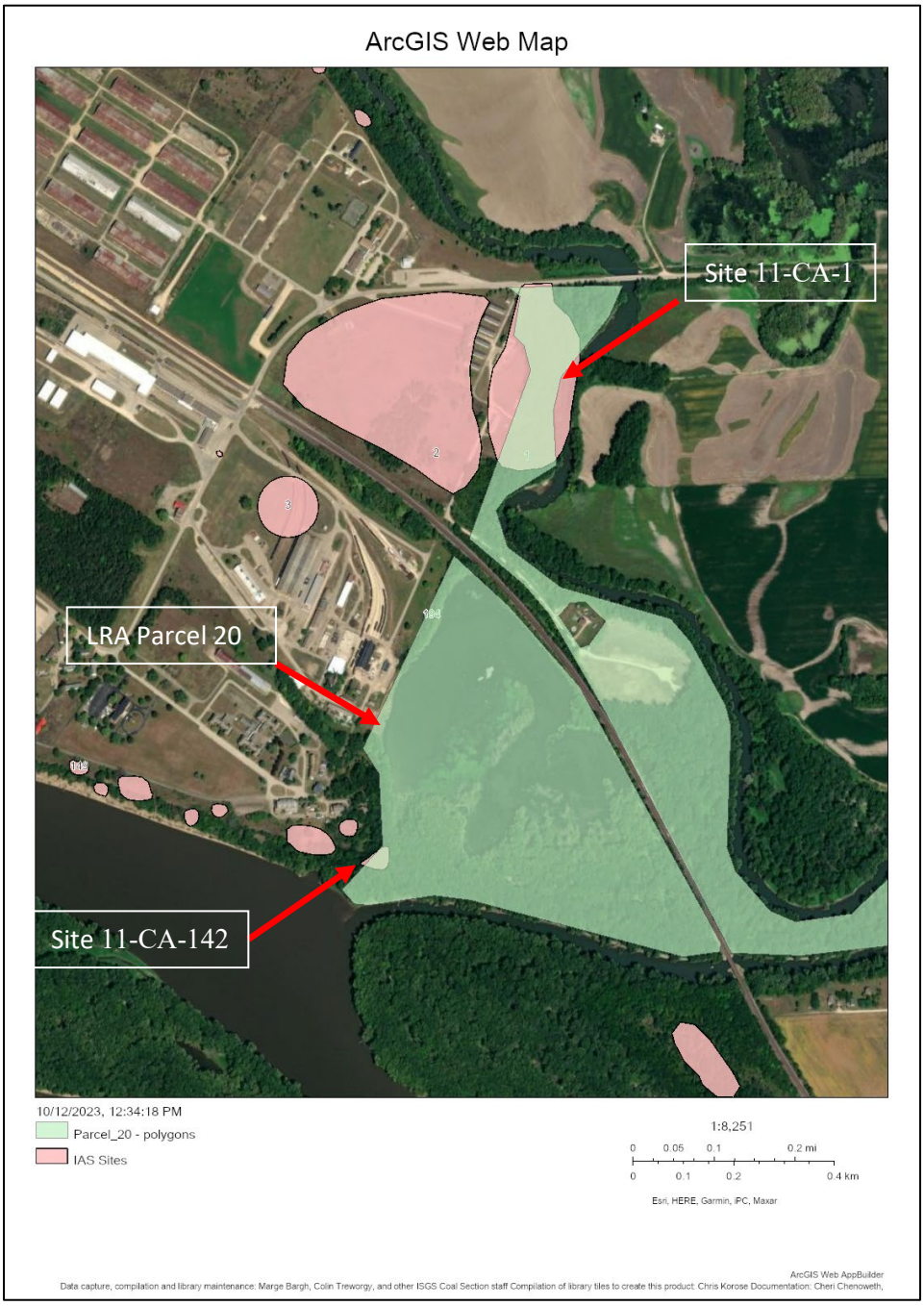


Figure 1. Aerial View of LRA Parcel 20, Showing Sites 11-CA-1 and 11-CA-142.

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

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

SHPO Log #005022420

Ms. Carol (CJ) Wallace, Cultural Resources Coordinator
Illinois Department of Natural Resources
Attn: State Historic Preservation Office
1 Natural Resources Way
Springfield, IL 62702

Dear Ms. Wallace:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of the Army's primary action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and the local redevelopment authority's (LRA's) secondary action of reuse of the parcel. The Army originally initiated consultation for this proposed action with you in February 2020, but the project was put on hold while the LRA developed its reuse plan. The LRA, referred to as the Jo-Carroll Depot LRA, now has developed specific plans for reuse. The Army is reinitiating consultation for this proposed action in compliance with the August 2000 Programmatic Agreement (PA) regarding historic resources at SVADA and Section 106 of the National Historic Preservation Act (NHPA).

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, Illinois (see the Enclosure 1 location map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure, and the Depot was officially closed in 2000. Since that time, the Army has been conducting environmental remediation at SVADA to clean up surplus property in preparation for transfer and transferring property as it is cleared. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the Jo-Carroll Depot LRA. The land transferred to the LRA for redevelopment is called the Savanna Industrial Park (SIP).

In 2016, the USFWS withdrew its interest in a 132-acre parcel of land at the southern end of SVADA (formerly known as Parcel FWS 5). The Army officially identified the parcel as surplus in January 2018 and is considering transferring it to the Jo-Carroll Depot LRA. Earlier in 2023, the LRA finalized a reuse plan for the parcel, which has been redesignated LRA Parcel 20. The LRA presents three conceptual reuse alternatives for redeveloping LRA Parcel 20 in its reuse plan. The LRA's primary focus is on no-cost economic development conveyance, including commercial and industrial development under each alternative. Since publishing its

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reuse plan, the LRA has also 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. The LRA reuse plan is available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-1689879402.pdf, and the appendices to the plan are available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-appendices-1689879402.pdf.

LRA Parcel 20 is undeveloped land in Carroll County, Illinois (see the enclosures 2 and 3 maps), bordered by the Apple River, a tributary of the Mississippi River, on the east and south; the Mississippi River on the west; Vincent Road and Rofsteck Road on the northwest; and Crim Road on the north. The SIP is adjacent to LRA Parcel 20 to the northwest. The parcel includes low-lying areas associated with the Apple River and Commander's Pond (formerly known as Ordnance School Lake). An active Burlington Northern Santa Fe Railway line bisects the parcel from northwest to southeast, but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by LRA Parcel 20, also is not part of the parcel to be transferred.

A PA regarding historic resources at SVADA and executed in August 2000 among the U.S. Army, Illinois State Historic Preservation Officer (SHPO), and Advisory Council on Historic Preservation is still in effect (Enclosure 4). A complete Phase I archaeological survey of LRA Parcel 20 was conducted by Brockington Associates (Brockington) in 2020. LRA Parcel 20 has no known buildings, structures, or traditional cultural properties currently listed in the National Register of Historic Places (NRHP). Two archaeological sites within LRA Parcel 20 (sites 11-CA-1 and 11-CA-142) are identified as potentially eligible for listing in the NRHP, and a third site (Site 11-CA-149) is not eligible (see the Enclosure 5 site photo). The Illinois SHPO responded in a letter dated December 24, 2020, that the project as proposed would have no adverse effect on the two potentially eligible sites and that Site 11CA194 is not eligible for listing in the NRHP, but that any plan modifications must include SHPO notification (Enclosure 6). Brockington finalized the *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois* in January 2021.

If any sites are determined to be NRHP eligible through additional archaeological testing within LRA Parcel 20, cultural resources encumbrances in the form of preservation covenant will apply in perpetuity, as appropriate, based on the SVADA PA and in consultation with the Illinois SHPO under Section 106 of the NHPA. See the preservation covenant in Enclosure 7.

If you have input regarding resources of concern to your agency or any questions concerning this BRAC action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you

wish to provide within 30 calendar days of receipt of this letter. We will provide you with an electronic copy or weblink to the EA when it is available for public review and comment.

Sincerely,

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Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Dr. Andrea Hunter, Director and THPO
The Osage Nation
PO Box 779
Pawhuska, OK 74056

Dear Dr. Hunter:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of the Army's primary action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and the local redevelopment authority's (LRA's) secondary action of reuse of the parcel. The Army originally initiated consultation for this proposed action with you in February 2020, but the project was put on hold while the LRA developed its reuse plan. The LRA, referred to as the Jo-Carroll Depot LRA, now has developed specific plans for reuse. With this mailing, the Army is reinitiating government-to-government consultation with you and other federally recognized Native American tribal governments on the potential effects of this proposed action on properties or areas of religious, traditional, and cultural importance to your Tribe in compliance with Section 106 of the National Historic Preservation Act (NHPA).

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, Illinois (Enclosure 1 location map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure, and the Depot was officially closed in 2000. Since that time, the Army has been conducting environmental remediation at SVADA to clean up surplus property in preparation for transfer and transferring property as it is cleared. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the Jo-Carroll Depot LRA. The land transferred to the LRA for redevelopment is called the Savanna Industrial Park (SIP).

In 2016, the USFWS withdrew its interest in a 132-acre parcel of land at the southern end of SVADA (formerly known as Parcel FWS 5). The Army officially identified the parcel as surplus in January 2018 and is considering transferring it to the Jo-Carroll Depot LRA. Earlier in 2023, the LRA finalized a reuse plan for the parcel, which has been redesignated LRA Parcel 20. The LRA presents three conceptual reuse alternatives for redevelopment of LRA Parcel 20 in its plan. The LRA's primary focus is on no-cost economic development conveyance, including commercial and industrial development under each alternative. Since publishing its reuse plan,

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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. The LRA reuse plan is available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-1689879402.pdf, and the appendices to the plan are available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-appendices-1689879402.pdf.

LRA Parcel 20 is undeveloped land in Carroll County, Illinois (Enclosure 2 site map), bordered by the Apple River, a tributary of the Mississippi River, on the east and south; the Mississippi River on the west; Vincent Road and Rofsteck Road on the northwest; and Crim Road on the north. The SIP is adjacent to Parcel 20 to the northwest. The parcel includes low-lying areas associated with the Apple River and Commander's Pond (formerly known as Ordnance School Lake). An active Burlington Northern Santa Fe Railway line bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by LRA Parcel 20, also is not part of the parcel to be transferred.

LRA Parcel 20 has no known buildings, structures, or traditional cultural properties currently listed in the National Register of Historic Places (NRHP). A complete Phase I archaeological survey of LRA Parcel 20 was conducted by Brockington Associates (Brockington) in 2020. The Phase I evaluated three archaeological sites on LRA Parcel 20. The survey determined that two of the sites are potentially eligible for listing in the NRHP and the third site is not eligible. The draft report was distributed for review to The Osage Nation on September 9, 2020, and Ms. Colleen Bell, Archaeologist in The Osage Nation Historic Preservation Office, responded the same day confirming receipt and noted that any comments would be forwarded. No comments were received. If you would like to receive another electronic copy, please email Todd Knuth, SVADA Base Environmental Coordinator, at william.t.knuth.civ@army.mil. Brockington finalized the *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois*, in January 2021.

If any sites are determined NRHP eligible through additional archaeological testing within LRA Parcel 20, cultural resource encumbrances, in the form of a preservation covenant will apply in perpetuity, as appropriate, based on the SVADA August 2000 Programmatic Agreement, in consultation with the Illinois State Historic Preservation Officer, and under Section 106 of the NHPA. See the preservation covenant in Enclosure 3.

If you wish to participate in the consultation for this action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil, by mail at the address provided in the letterhead, or by phone at 815-273-8312. So that this process can continue to move forward, we would appreciate hearing from you within 30 calendar days of

receipt of this letter. We will provide you with an electronic copy or weblink to the EA or a printed copy of the EA upon request for your review and comment when it is available.

Sincerely,

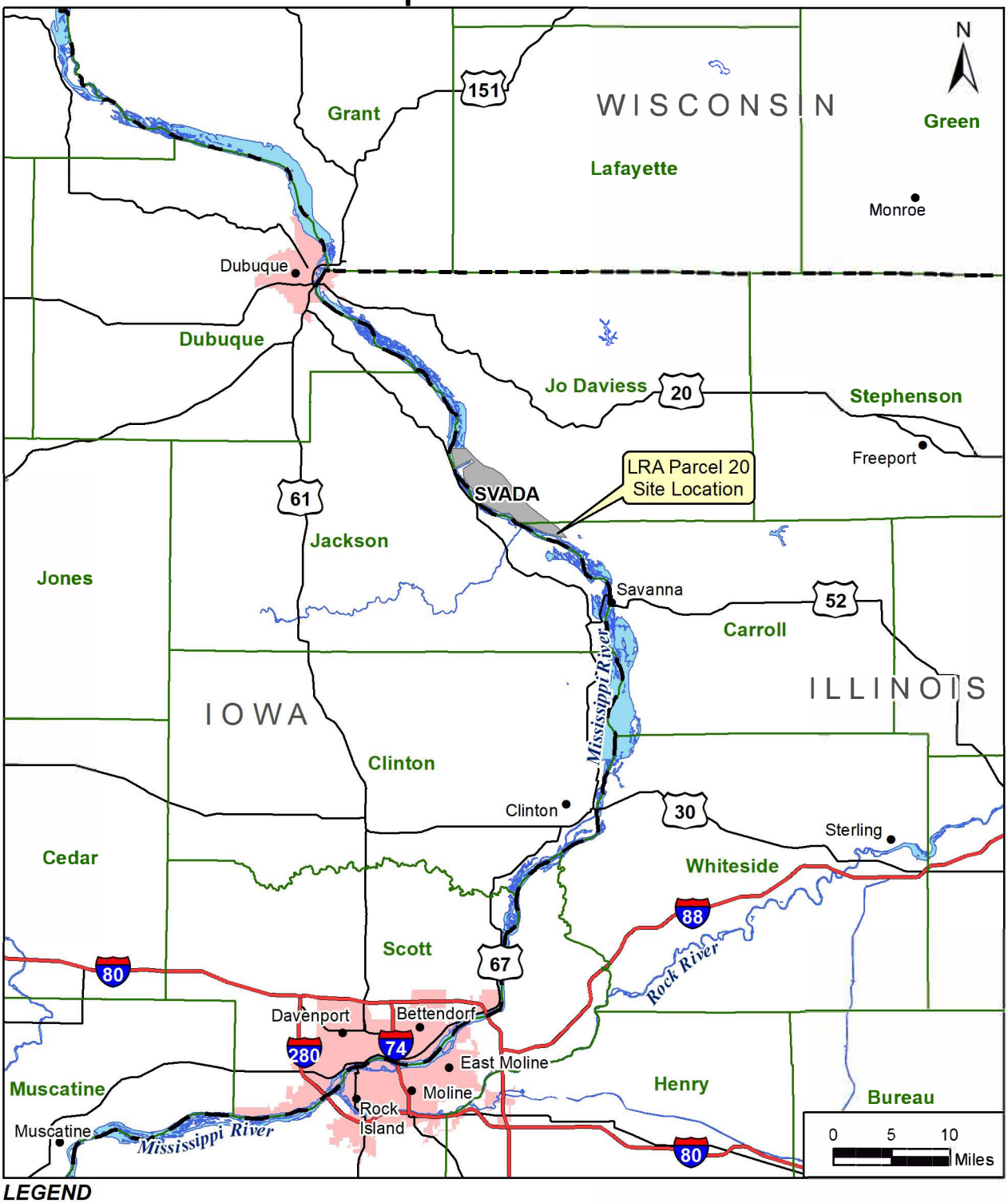
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Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

Enclosure 1: Location Map



LEGEND

- State Boundary
- County Boundary
- Interstate Highway
- U.S. Route
- Urban Area
- Surface Water

Enclosure 2: Site Map



LEGEND

Parcel Boundary

Note: Boundaries are approximate.

Enclosure 3: Preservation Covenant

PRESERVATION COVENANT
SVADA LRA Parcel 20

(held by Illinois Department of Natural Resources)

In consideration of the conveyance of certain real property, hereinafter referred to as the

SVADA LRA Parcel 20, located in Carroll County, Illinois, which is more fully describes as:

The Savanna Army Depot Activity (SVADA) local redevelopment authority (LRA) Parcel 20 at the southern end of SVADA in Carroll County, Illinois. The parcel is bounded by the Apple River to the east and south; the Mississippi River to the west; Vincent Road and Rofsteck Road to the northwest; and Crim Road to the north. The parcel is bisected from the northwest to the southeast by an active railroad line owned by the Burlington Northern Santa Fe Railway Company; the rail line is not part of the parcel to be transferred. A sewage treatment plant owned by the U.S. Army is surrounded by LRA Parcel 20, also is not part of the parcel to be transferred (Figure 1).

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.
3. Additional archaeological testing, NRHP site evaluations, and potential mitigation measures require additional Illinois SHPO consultation and Section 106 of the National Historic Preservation Act (NHPA) compliance measures, as required by law.
4. Execution of this Covenant shall include all applicable conditions, restrictions, laws, orders, and obligations set forth in the SVADA Programmatic Agreement (PA).
5. Conveyance of property that includes archaeological sites:
    a. In consideration of the conveyance of the real property, LRA Parcel 20, which includes the sites 11-CA-1 and 11-CA-142 located in Carroll County, Illinois. Jo-Carroll Depot LRA covenants on behalf of itself, its heirs, or successors, and assigns at all times to the Illinois SHPO to maintain and preserve sites 11-CA-1 and 11-CA-142, in accordance with the provisions of this Covenant.
    b. The property recipient will notify the Illinois SHPO in writing prior to any undertaking of any ground disturbance or action on sites that would affect the physical integrity of sites 11-CA-1 and 11-CA-142. Such a notice shall describe in reasonable detail the proposed undertaking and its expected effect on the physical integrity of sites 11-CA-1 and 11-CA-142.

c. Within thirty (30) calendar days of the Illinois SHPO's receipt of notification provided by the LRA, pursuant to this Covenant, the SHPO will respond to the LRA in writing as follows:
    i. That the LRA may proceed with the proposed undertaking without further consultation; or
    ii. That the LRA must initiate and complete additional consultation with the Illinois SHPO before it can proceed with the proposed undertaking; or
    iii. If the Illinois SHPO fails to respond to the LRA's written notice within thirty (30) calendar days of the SHPO's receipt of the same, then the LRA may proceed with the proposed undertaking without further consultation with the SHPO.
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    i. Archaeological sites 11-CA-1 and 11-CA-142 are potentially eligible for inclusion in the NRHP.
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    iv. Notification will include a detailed description of the proposed undertaking.
    v. If the Army does not object to the proposal within thirty (30) calendar days of receipt of such notification and adequate supporting documentation, the Army will, with the assistance of the Lessee (Licensee), initiate consultation with Illinois SHPO in accordance with NHPA Section 106 and its implementing regulations, "Protection of Historic Properties" (Title 36of the Code of Federal Regulations Part 800).
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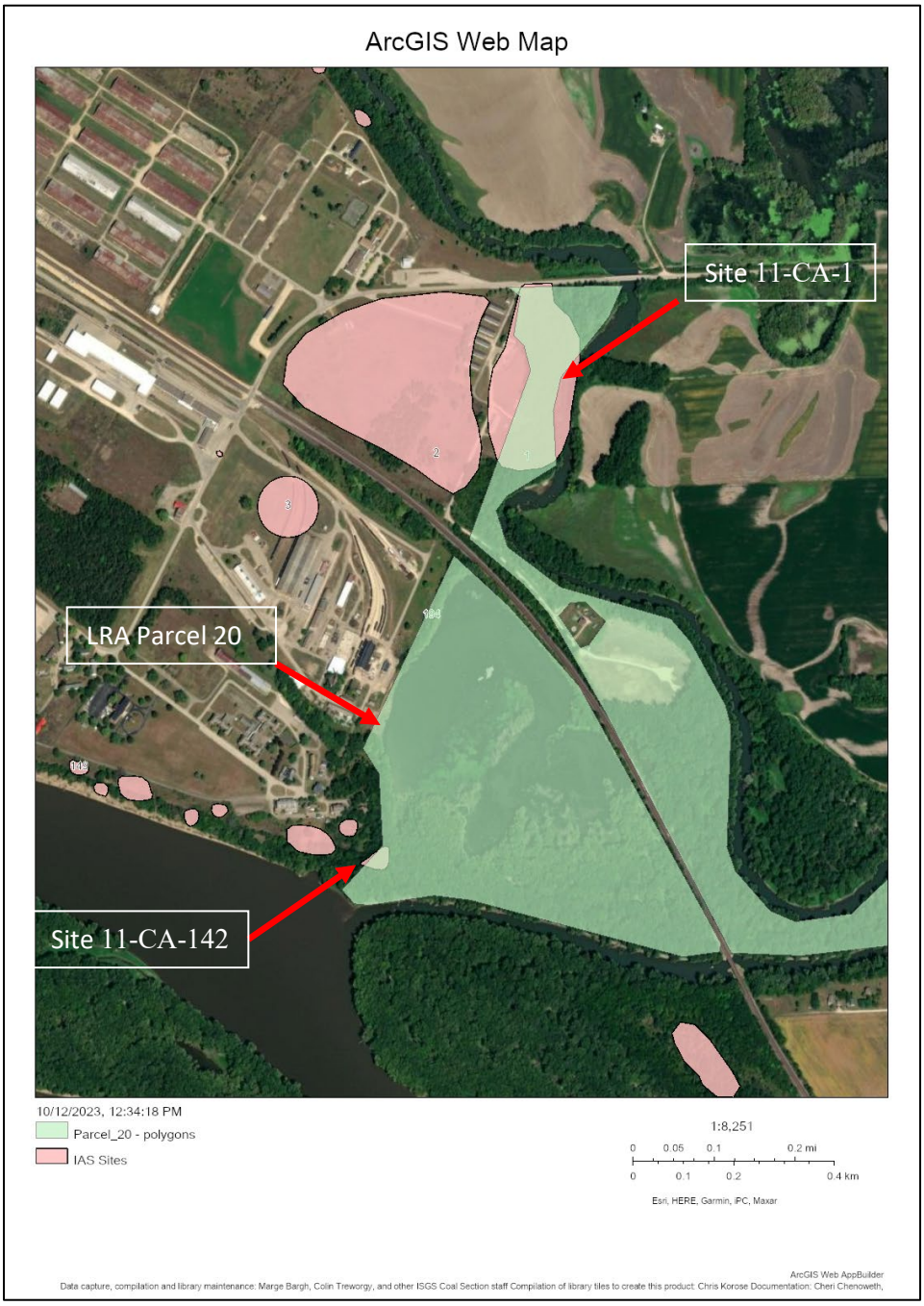


Figure 1. Aerial View of LRA Parcel 20, Showing Sites 11-CA-1 and 11-CA-142.

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Geoffrey Standing Bear, Principal Chief
The Osage Nation
PO Box 779
Pawhuska, OK 74056

Dear Principal Chief Standing Bear:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of the Army's primary action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and the local redevelopment authority's (LRA's) secondary action of reuse of the parcel. The Army originally initiated consultation for this proposed action with you in February 2020, but the project was put on hold while the LRA developed its reuse plan. The LRA, referred to as the Jo-Carroll Depot LRA, now has developed specific plans for reuse. With this mailing, the Army is reinitiating government-to-government consultation with you and other federally recognized Native American tribal governments on the potential effects of this proposed action on properties or areas of religious, traditional, and cultural importance to your Tribe in compliance with Section 106 of the National Historic Preservation Act (NHPA).

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, Illinois (Enclosure 1 location map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure, and the Depot was officially closed in 2000. Since that time, the Army has been conducting environmental remediation at SVADA to clean up surplus property in preparation for transfer and transferring property as it is cleared. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the Jo-Carroll Depot LRA. The land transferred to the LRA for redevelopment is called the Savanna Industrial Park (SIP).

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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. The LRA reuse plan is available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-1689879402.pdf, and the appendices to the plan are available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-appendices-1689879402.pdf.

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LRA Parcel 20 has no known buildings, structures, or traditional cultural properties currently listed in the National Register of Historic Places (NRHP). A complete Phase I archaeological survey of LRA Parcel 20 was conducted by Brockington Associates (Brockington) in 2020. The Phase I evaluated three archaeological sites on LRA Parcel 20. The survey determined that two of the sites are potentially eligible for listing in the NRHP and the third site is not eligible. The draft report was distributed for review to The Osage Nation on September 9, 2020, and Ms. Colleen Bell, Archaeologist in The Osage Nation Historic Preservation Office, responded the same day confirming receipt and noted that any comments would be forwarded. No comments were received. If you would like to receive another electronic copy, please email Todd Knuth, SVADA Base Environmental Coordinator, at william.t.knuth.civ@army.mil. Brockington finalized the *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois*, in January 2021.

If any sites are determined NRHP eligible through additional archaeological testing within LRA Parcel 20, cultural resource encumbrances, in the form of a preservation covenant will apply in perpetuity, as appropriate, based on the SVADA August 2000 Programmatic Agreement, in consultation with the Illinois State Historic Preservation Officer, and under Section 106 of the NHPA. See the preservation covenant in Enclosure 3.

If you wish to participate in the consultation for this action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil, by mail at the address provided in the letterhead, or by phone at 815-273-8312. So that this process can continue to move forward, we would appreciate hearing from you within 30 calendar days of

receipt of this letter. We will provide you with an electronic copy or weblink to the EA or a printed copy of the EA upon request for your review and comment when it is available.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2023.11.27 12:12:21 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. David Grignon, THPO
Menominee Indian Tribe of Wisconsin
PO Box 910
Keshena, WI 54135

Dear Mr. Grignon:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of the Army's primary action disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and the local redevelopment authority's (LRA's) secondary action of reuse of the parcel. The Army originally initiated consultation for this proposed action with you in February 2020, but the project was put on hold while the LRA developed its reuse plan. The LRA, referred to as the Jo-Carroll Depot LRA, now has developed specific plans for reuse. With this mailing, the Army is reinitiating government-to-government consultation with you and other federally recognized Native American tribal governments on the potential effects of this proposed action on properties or areas of religious, traditional, and cultural importance to your Tribe in compliance with Section 106 of the National Historic Preservation Act (NHPA).

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, Illinois (see Enclosure 1 location map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure, and the Depot was officially closed in 2000. Since that time, the Army has been conducting environmental remediation at SVADA to clean up surplus property in preparation for transfer and transferring property as it is cleared. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the Jo-Carroll Depot LRA. The land transferred to the LRA for redevelopment is called the Savanna Industrial Park (SIP).

In 2016, the USFWS withdrew its interest in a 132-acre parcel of land at the southern end of SVADA (formerly known as Parcel FWS 5). The Army officially identified the parcel as surplus in January 2018 and is considering transferring it to the Jo-Carroll Depot LRA. Earlier in 2023, the LRA finalized a reuse plan for the parcel, which has been redesignated as LRA Parcel 20. The LRA presents three conceptual reuse alternatives for redeveloping LRA Parcel 20 in its plan. The LRA's primary focus is on no-cost economic development conveyance, including commercial and industrial development under each alternative. Since publishing its reuse plan,

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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. The LRA reuse plan is available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-1689879402.pdf, and the appendices to the plan are available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-appendices-1689879402.pdf.

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receipt of this letter. We will provide you with an electronic copy or weblink to the EA or a printed copy of the EA upon request for your review and comment when it is available.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2023.11.27 12:12:21 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Ms. Gena Kakkak, Chairwoman
Menominee Indian Tribe of Wisconsin
PO Box 910
Keshena, WI 54135

Dear Chairwoman Kakkak:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of the Army's primary action disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and the local redevelopment authority's (LRA's) secondary action of reuse of the parcel. The Army originally initiated consultation for this proposed action with you in February 2020, but the project was put on hold while the LRA developed its reuse plan. The LRA, referred to as the Jo-Carroll Depot LRA, now has developed specific plans for reuse. With this mailing, the Army is reinitiating government-to-government consultation with you and other federally recognized Native American tribal governments on the potential effects of this proposed action on properties or areas of religious, traditional, and cultural importance to your Tribe in compliance with Section 106 of the National Historic Preservation Act (NHPA).

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Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2023.11.27 12:12:21 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. William Quackenbush, THPO
Ho-Chunk Nation of Wisconsin
16250 Helmet Rd.
Tomah, WI 54660

Dear Mr. Quackenbush:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of the Army's primary action disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and the local redevelopment authority's (LRA's) secondary action of reuse of the parcel. The Army originally initiated consultation for this proposed action with you in February 2020, but the project was put on hold while the LRA developed its reuse plan. The LRA, referred to as the Jo-Carroll Depot LRA, now has developed specific plans for reuse. With this mailing, the Army is reinitiating government-to-government consultation with you and other federally recognized Native American tribal governments on the potential effects of this proposed action on properties or areas of religious, traditional, and cultural importance to your Tribe in compliance with Section 106 of the National Historic Preservation Act (NHPA).

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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. The LRA reuse plan is available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-1689879402.pdf, and the appendices to the plan are available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-appendices-1689879402.pdf.

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Sincerely,

LINEER.THOMAS.A LDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2023.11.27 12:12:21 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. John Greendeer, President
Ho-Chunk Nation of Wisconsin
PO Box 667
Black River Falls, WI 54615

Dear President Greendeer:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of the Army's primary action disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and the local redevelopment authority's (LRA's) secondary action of reuse of the parcel. The Army originally initiated consultation for this proposed action with you in February 2020, but the project was put on hold while the LRA developed its reuse plan. The LRA, referred to as the Jo-Carroll Depot LRA, now has developed specific plans for reuse. With this mailing, the Army is reinitiating government-to-government consultation with you and other federally recognized Native American tribal governments on the potential effects of this proposed action on properties or areas of religious, traditional, and cultural importance to your Tribe in compliance with Section 106 of the National Historic Preservation Act (NHPA).

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Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2023.11.27 12:12:21 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Logan York, THPO
Miami Tribe of Oklahoma
PO Box 1326
Miami, OK 74355

Dear Mr. York:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of the Army's primary action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and the local redevelopment authority's (LRA's) secondary action of reuse of the parcel. The Army originally initiated consultation for this proposed action with you in February 2020, but the project was put on hold while the LRA developed its reuse plan. The LRA, referred to as the Jo-Carroll Depot LRA, now has developed specific plans for reuse. With this mailing, the Army is reinitiating government-to-government consultation with you and other federally recognized Native American tribal governments on the potential effects of this proposed action on properties or areas of religious, traditional, and cultural importance to your Tribe in compliance with Section 106 of the National Historic Preservation Act (NHPA).

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If you wish to participate in the consultation for this action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. So that this process can continue to move forward, we would appreciate hearing from you within 30 calendar days of

receipt of this letter. We will provide you with an electronic copy or weblink to the EA or a printed copy of the EA upon request for your review and comment when it is available.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2023.11.27 12:12:21 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Douglas Lankford, Chief
Miami Tribe of Oklahoma
PO Box 1326
Miami, OK 74355

Dear Chief Lankford:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of the Army's primary action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and the local redevelopment authority's (LRA's) secondary action of reuse of the parcel. The Army originally initiated consultation for this proposed action with you in February 2020, but the project was put on hold while the LRA developed its reuse plan. The LRA, referred to as the Jo-Carroll Depot LRA, now has developed specific plans for reuse. With this mailing, the Army is reinitiating government-to-government consultation with you and other federally recognized Native American tribal governments on the potential effects of this proposed action on properties or areas of religious, traditional, and cultural importance to your Tribe in compliance with Section 106 of the National Historic Preservation Act (NHPA).

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In 2016, the USFWS withdrew its interest in a 132-acre parcel of land at the southern end of SVADA (formerly known as Parcel FWS 5). The Army officially identified the parcel as surplus in January 2018 and is considering transferring it to the Jo-Carroll Depot LRA. Earlier in 2023, the LRA finalized a reuse plan for the parcel, which has been redesignated as LRA Parcel 20. The LRA presents three conceptual reuse alternatives for redeveloping LRA Parcel 20 in its plan. The LRA's primary focus is on no-cost economic development conveyance including commercial and industrial development under each alternative. Since publishing its reuse plan,

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LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2023.11.27 12:12:21 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Ms. Sandra Massey, THPO
Sac & Fox Nation, Oklahoma
920883 South Highway 99 Building A
Stroud, OK 74079

Dear Ms. Massey:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of the Army's primary action disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and the local redevelopment authority's (LRA's) secondary action of reuse of the parcel. The Army originally initiated consultation for this proposed action with you in February 2020, but the project was put on hold while the LRA developed its reuse plan. The LRA, referred to as the Jo-Carroll Depot LRA, now has developed specific plans for reuse. With this mailing, the Army is reinitiating government-to-government consultation with you and other federally recognized Native American tribal governments on the potential effects of this proposed action on properties or areas of religious, traditional, and cultural importance to your Tribe in compliance with Section 106 of the National Historic Preservation Act (NHPA).

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LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2023.11.27 12:12:21 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Don Abney, Interim Principal Chief
Sac & Fox Nation, Oklahoma
920883 South Highway 99 Building A
Stroud, OK 74079

Dear Interim Principal Chief Abney:

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Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Vern Jefferson, Chairman
Sac & Fox Tribe of the Mississippi in Iowa
349 Meskwaki Rd.
Tama, IA 52339

Dear Chairman Jefferson:

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Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Johnathan Buffalo, THPO
Sac & Fox Tribe of the Mississippi in Iowa
349 Meskwaki Rd.
Tama, IA 52339

Dear Mr. Buffalo:

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Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2023.11.27 12:12:21 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Ms. Sunshine Thomas-Bear, THPO
Winnebago Tribe of Nebraska
PO Box 687
Winnebago, NE 68071

Dear Ms. Thomas-Bear:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of the Army's primary action disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and the local redevelopment authority's (LRA's) secondary action of reuse of the parcel. The Army originally initiated consultation for this proposed action with you in February 2020, but the project was put on hold while the LRA developed its reuse plan. The LRA, referred to as the Jo-Carroll Depot LRA, now has developed specific plans for reuse. With this mailing, the Army is reinitiating government-to-government consultation with you and other federally recognized Native American tribal governments on the potential effects of this proposed action on properties or areas of religious, traditional, and cultural importance to your Tribe in compliance with Section 106 of the National Historic Preservation Act (NHPA).

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In 2016, the USFWS withdrew its interest in a 132-acre parcel of land at the southern end of SVADA (formerly known as Parcel FWS 5). The Army officially identified the parcel as surplus in January 2018 and is considering transferring it to the Jo-Carroll Depot LRA. Earlier in 2023, the LRA finalized a reuse plan for the parcel, which has been redesignated as LRA Parcel 20. The LRA presents three conceptual reuse alternatives for redeveloping LRA Parcel 20 in its plan. The LRA's primary focus is on no-cost economic development conveyance, including commercial and industrial development under each alternative. Since publishing its reuse plan,

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Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Ms. Victoria Kitcheyan, Chairperson
Winnebago Tribe of Nebraska
PO Box 687
Winnebago, NE 68071

Dear Chairperson Kitcheyan:

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LINEER.THOMAS.A LDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2023.11.27 12:12:21 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Ms. Tiauna Carnes, Chairperson
Sac & Fox Nation of Missouri in Kansas and Nebraska
305 North Main St.
Reserve, KS 66434

Dear Chairperson Carnes:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of the Army's primary action disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and the local redevelopment authority's (LRA's) secondary action of reuse of the parcel. The Army originally initiated consultation for this proposed action with you in February 2020, but the project was put on hold while the LRA developed its reuse plan. The LRA, referred to as the Jo-Carroll Depot LRA, now has developed specific plans for reuse. With this mailing, the Army is reinitiating government-to-government consultation with you and other federally recognized Native American tribal governments on the potential effects of this proposed action on properties or areas of religious, traditional, and cultural importance to your Tribe in compliance with Section 106 of the National Historic Preservation Act (NHPA).

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Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Ms. Melissa Wiatrolik, THPO
Little Traverse Bay Bands of Odawa Indians, Michigan
7500 Odawa Circle
Harbor Springs, MI 49740

Dear Ms. Wiatrolik:

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BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Ms. Regina Gasco-Bentley, Chairperson
Little Traverse Bay Bands of Odawa Indians, Michigan
7500 Odawa Circle
Harbor Springs, MI 49740

Dear Chairperson Gasco-Bentley:

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Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Kent Collier, NAGPRA
Kickapoo Tribe of Oklahoma
PO Box 70
McLoud, OK 74851

Dear Mr. Collier:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of the Army's primary action disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and the local redevelopment authority's (LRA's) secondary action of reuse of the parcel. The Army originally initiated consultation for this proposed action with you in February 2020, but the project was put on hold while the LRA developed its reuse plan. The LRA, referred to as the Jo-Carroll Depot LRA, now has developed specific plans for reuse. With this mailing, the Army is reinitiating government-to-government consultation with you and other federally recognized Native American tribal governments on the potential effects of this proposed action on properties or areas of religious, traditional, and cultural importance to your Tribe in compliance with Section 106 of the National Historic Preservation Act (NHPA).

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, Illinois (see Enclosure 1 location map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure, and the Depot was officially closed in 2000. Since that time, the Army has been conducting environmental remediation at SVADA to clean up surplus property in preparation for transfer and transferring property as it is cleared. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the Jo-Carroll Depot LRA. The land transferred to the LRA for redevelopment is called the Savanna Industrial Park (SIP).

In 2016, the USFWS withdrew its interest in a 132-acre parcel of land at the southern end of SVADA (formerly known as Parcel FWS 5). The Army officially identified the parcel as surplus in January 2018 and is considering transferring it to the Jo-Carroll Depot LRA. Earlier in 2023, the LRA finalized a reuse plan for the parcel, which has been redesignated as LRA Parcel 20. The LRA presents three conceptual reuse alternatives for redeveloping LRA Parcel 20 in its plan. The LRA's primary focus is on no-cost economic development conveyance, including commercial and industrial development under each alternative. Since publishing its reuse plan,

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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. The LRA reuse plan is available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-1689879402.pdf, and the appendices to the plan are available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-appendices-1689879402.pdf.

LRA Parcel 20 is undeveloped land in Carroll County, Illinois (see the Enclosure 2 site map), bordered by the Apple River, a tributary of the Mississippi River, on the east and south; the Mississippi River on the west; Vincent Road and Rofsteck Road on the northwest; and Crim Road on the north. The SIP is adjacent to LRA Parcel 20 to the northwest. The parcel includes low-lying areas associated with the Apple River and Commander's Pond (formerly known as Ordnance School Lake). An active Burlington Northern Santa Fe Railway line bisects the parcel from the northwest to the southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by LRA Parcel 20, also is not part of the parcel to be transferred.

LRA Parcel 20 has no known buildings, structures, or traditional cultural properties currently listed on the National Register of Historic Places (NRHP). A complete Phase I archaeological survey of LRA Parcel 20 was conducted by Brockington Associates (Brockington) in 2020. The Phase I evaluated three archaeological sites on Parcel 20. The survey determined that two of the sites are potentially eligible for the NRHP, and the third site is not. The draft report was distributed for review in September 2020, but if you would like to receive another electronic copy, please email Todd Knuth, SVADA Base Environmental Coordinator, at william.t.knuth.civ@army.mil. Brockington finalized the *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois*, in January 2021.

If any sites are determined to be NRHP eligible through additional archaeological testing within LRA Parcel 20, cultural resource encumbrances, in the form of a preservation covenant will apply in perpetuity, as appropriate, based on the SVADA August 2000 Programmatic Agreement, in consultation with the Illinois State Historic Preservation Officer, and under Section 106 of the NHPA. See the preservation covenant in Enclosure 3.

If you wish to participate in the consultation for this action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. So that this process can continue to move forward, we would appreciate hearing from you within 30 calendar days of

receipt of this letter. We will provide you with an electronic copy or weblink to the EA or a printed copy of the EA upon request for your review and comment when it is available.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2023.11.27 12:12:21 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

DEPARTMENT OF THE ARMY
SAVANNA ARMY DEPOT ACTIVITY
18935 B STREET
SAVANNA IL 61074

REPLY TO
ATTENTION OF:

November 27, 2023

SUBJECT: Preparation of an Environmental Assessment for the Implementation of BRAC Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois

Mr. Darwin Kaskaske, Chairman
Kickapoo Tribe of Oklahoma
PO Box 70
McLoud, OK 74851

Dear Chairman Kaskaske:

The U.S. Army is preparing the subject Environmental Assessment (EA) to evaluate the potential effects of the Army's primary action disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and the local redevelopment authority's (LRA's) secondary action of reuse of the parcel. The Army originally initiated consultation for this proposed action with you in February 2020, but the project was put on hold while the LRA developed its reuse plan. The LRA, referred to as the Jo-Carroll Depot LRA, now has developed specific plans for reuse. With this mailing, the Army is reinitiating government-to-government consultation with you and other federally recognized Native American tribal governments on the potential effects of this proposed action on properties or areas of religious, traditional, and cultural importance to your Tribe in compliance with Section 106 of the National Historic Preservation Act (NHPA).

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, Illinois (see Enclosure 1 location map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure, and the Depot was officially closed in 2000. Since that time, the Army has been conducting environmental remediation at SVADA to clean up surplus property in preparation for transfer and transferring property as it is cleared. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the Jo-Carroll Depot LRA. The land transferred to the LRA for redevelopment is called the Savanna Industrial Park (SIP).

In 2016, the USFWS withdrew its interest in a 132-acre parcel of land at the southern end of SVADA (formerly known as Parcel FWS 5). The Army officially identified the parcel as surplus in January 2018 and is considering transferring it to the Jo-Carroll Depot LRA. Earlier in 2023, the LRA finalized a reuse plan for the parcel, which has been redesignated as LRA Parcel 20. The LRA presents three conceptual reuse alternatives for redeveloping LRA Parcel 20 in its plan. The LRA's primary focus is on no-cost economic development conveyance, including commercial and industrial development under each alternative. Since publishing its reuse plan,

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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. The LRA reuse plan is available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-1689879402.pdf, and the appendices to the plan are available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-appendices-1689879402.pdf.

LRA Parcel 20 is undeveloped land in Carroll County, Illinois (see the Enclosure 2 site map), bordered by the Apple River, a tributary of the Mississippi River, on the east and south; the Mississippi River on the west; Vincent Road and Rofsteck Road on the northwest; and Crim Road on the north. The SIP is adjacent to LRA Parcel 20 to the northwest. The parcel includes low-lying areas associated with the Apple River and Commander's Pond (formerly known as Ordnance School Lake). An active Burlington Northern Santa Fe Railway line bisects the parcel from the northwest to the southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by LRA Parcel 20, also is not part of the parcel to be transferred.

LRA Parcel 20 has no known buildings, structures, or traditional cultural properties currently listed on the National Register of Historic Places (NRHP). A complete Phase I archaeological survey of LRA Parcel 20 was conducted by Brockington Associates (Brockington) in 2020. The Phase I evaluated three archaeological sites on Parcel 20. The survey determined that two of the sites are potentially eligible for the NRHP, and the third site is not. The draft report was distributed for review in September 2020, but if you would like to receive another electronic copy, please email Todd Knuth, SVADA Base Environmental Coordinator, at william.t.knuth.civ@army.mil. Brockington finalized the *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois*, in January 2021.

If any sites are determined to be NRHP eligible through additional archaeological testing within LRA Parcel 20, cultural resource encumbrances, in the form of a preservation covenant will apply in perpetuity, as appropriate, based on the SVADA August 2000 Programmatic Agreement, in consultation with the Illinois State Historic Preservation Officer, and under Section 106 of the NHPA. See the preservation covenant in Enclosure 3.

If you wish to participate in the consultation for this action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. So that this process can continue to move forward, we would appreciate hearing from you within 30 calendar days of

receipt of this letter. We will provide you with an electronic copy or weblink to the EA or a printed copy of the EA upon request for your review and comment when it is available.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2023.11.27 12:12:21 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity

Appendix G3. 2024 Coordination and Consultation

Enclosures are provided only for the first letter.

Responses received follow the letter sent.

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

August 8, 2024

SUBJECT: 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

Mr. Kraig McPeek, Field Office Supervisor
USFWS, Illinois-Iowa Ecological Services Field Office
1511 47th Ave.
Moline, IL 61265

Dear Mr. McPeek:

The U.S. Army (Army) is initiating early coordination with your office pertaining to the subject Supplemental Environmental Impact Statement (SEIS) for resources under your purview, including under Section 7 of the Endangered Species Act. The Army will prepare the SEIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the SEIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) and (2) the LRA's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 environmental impact statement (EIS) evaluated the closure, and the Depot was officially closed in 2000. The subject SEIS will be supplemental to the 1997 EIS.

The Army originally initiated consultation with your office for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in November 2023. We thank you for your December 19, 2023, response. Based on information received during the EA scoping process, the Army determined that preparation of a SEIS would be appropriate. The Army will issue a Notice of Intent to prepare the SEIS later this year and will notify you of the beginning of the scoping process and of the public scoping meeting date and location.

At this time, the Army is initiating early coordination with you for the SEIS to request (1) your input on the Army holding an agency meeting separate from the public scoping meeting and (2) any comments you might have in addition to those you provided in your letter of December 19, 2023. The

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project remains unchanged from the description of it presented for the 2023 scoping. The remainder of this letter provides information on the project location and the proposed action and alternatives.

The 132-acre parcel is undeveloped land in Carroll County, IL (Enclosure 2, Site Map). The parcel includes Commander's Pond (formerly known as Ordnance School Lake). The parcel shares a border with the Upper Mississippi River National Wildlife and Fish Refuge (Enclosure 3, Map of Upper Mississippi River National Wildlife and Fish Refuge) and is bordered on the east and south by the Apple River, a tributary of the Mississippi River; the Mississippi River on the southwest; Vincent Road and Rofsteck Road on the west; and Crim Road on the north. While these rivers and roads form the boundaries of the parcel, they are not part of it. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by the 132-acre parcel, also is not part of the parcel to be transferred.

Since 2000, through the BRAC process, as former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, the Army has transferred them to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources (DNR), and the LRA. The Army already has transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west/northwest.

In 2016, USFWS withdrew interest in the 132-acre parcel of land (formerly known as Parcel FWS 5) at the southeastern end of SVADA. The Army officially identified the parcel as surplus in January 2018. The Army's proposed action is disposal of the parcel, which has been redesignated LRA Parcel 20, and transferring the property to the LRA.

The LRA's finalized 2023 reuse plan for the parcel is available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-1689879402.pdf, and the appendices to the plan are available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-appendices-1689879402.pdf. The LRA presents three conceptual reuse alternatives for developing LRA Parcel 20 in its plan, which focus on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development, under each alternative. 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 includes activities outside the boundary of LRA Parcel 20 in the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island. All the LRA's reuse alternatives would require dredging.

If you have input regarding an agency scoping meeting, resources of concern to your agency, or any questions concerning this BRAC action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter.

Sincerely,

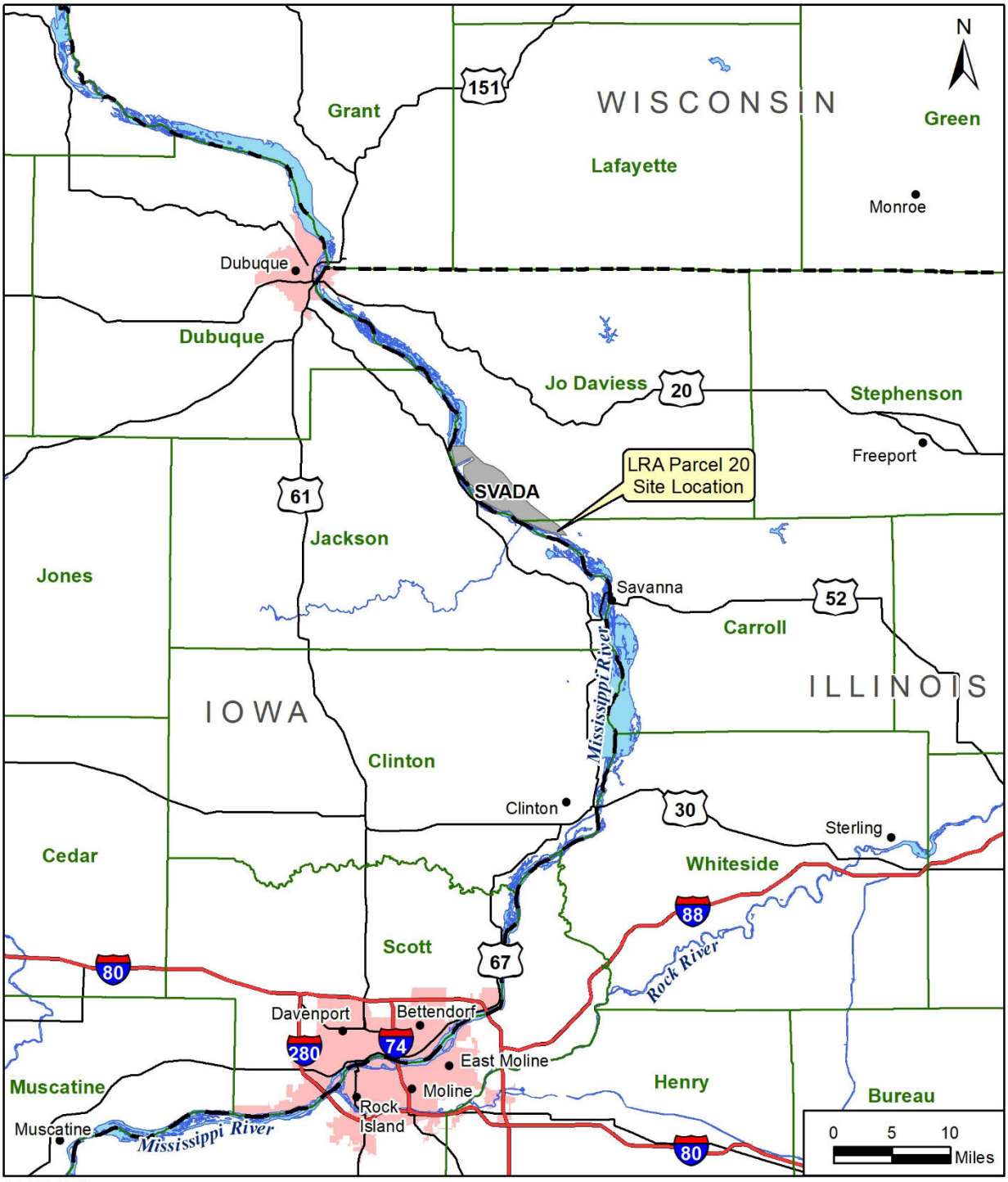
LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2024.08.08 08:34:20 -04'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Travis Black, U.S. Department of Transportation, Maritime Administration, Director, Inland Waterways Gateway (St. Louis)
Mr. Ed Britton, USFWS, Upper Mississippi River National Wildlife and Fish Refuge, Savanna District Office
Ms. Jodi Creswell, USACE, Rock Island District, Chief, Environmental Planning Branch
Ms. Charlene Falco, Illinois Environmental Protection Agency, Project Manager, Federal Site Remediation Section, Bureau of Land
Ms. Nicole Goers, U.S. Environmental Protection Agency (USEPA) Region 5, Remedial Project Manager, Remedial Response Section 5
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. Bradley Hayes, Illinois DNR, Manager, Impact Assessment Section
Mr. William (Todd) Knuth, Savanna Army Depot Activity, Base Environmental Coordinator
Ms. Krystle McClain, USEPA Region 5, NEPA Program Supervisor
Mr. Kraig McPeek, USFWS Illinois-Iowa Ecological Services Field Office, Field Office Supervisor
Ms. Natalie Phelps Finnie, Illinois DNR, Director

Enclosure 1: Location Map



LEGEND

- State Boundary
- County Boundary
- Interstate Highway
- U.S. Route
- Urban Area
- Surface Water

Enclosure 2: Site Map



LEGEND

LRA Parcel 20 Boundary

Enclosure 3: Map of USFWS UMRNWFR



Note: Boundaries are approximate.

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

August 8, 2024

SUBJECT: 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

Mr. Ed Britton, District Manager
USFWS, UMRNWFR, Savanna District Office
7071 Riverview Rd.
Thomson, IL 61285

Dear Mr. Britton:

The U.S. Army (Army) is initiating early coordination with your office pertaining to the subject Supplemental Environmental Impact Statement (SEIS) for resources under your purview, including under Section 7 of the Endangered Species Act. The Army will prepare the SEIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the SEIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) and (2) the LRA's secondary indirect action of reuse of the parcel.

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project remains unchanged from the description of it presented for the 2023 scoping. The remainder of this letter provides information on the project location and the proposed action and alternatives.

The 132-acre parcel is undeveloped land in Carroll County, IL (Enclosure 2, Site Map). The parcel includes Commander's Pond (formerly known as Ordnance School Lake). The parcel shares a border with the Upper Mississippi River National Wildlife and Fish Refuge (Enclosure 3, Map of Upper Mississippi River National Wildlife and Fish Refuge) and is bordered on the east and south by the Apple River, a tributary of the Mississippi River; the Mississippi River on the southwest; Vincent Road and Rofsteck Road on the west; and Crim Road on the north. While these rivers and roads form the boundaries of the parcel, they are not part of it. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by the 132-acre parcel, also is not part of the parcel to be transferred.

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Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2024.08.08 08:34:20 -04'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
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Mr. Ed Britton, USFWS, Upper Mississippi River National Wildlife and Fish Refuge, Savanna District Office
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Ms. Krystle McClain, USEPA Region 5, NEPA Program Supervisor
Mr. Kraig McPeek, USFWS Illinois-Iowa Ecological Services Field Office, Field Office Supervisor
Ms. Natalie Phelps Finnie, Illinois DNR, Director

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.

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.

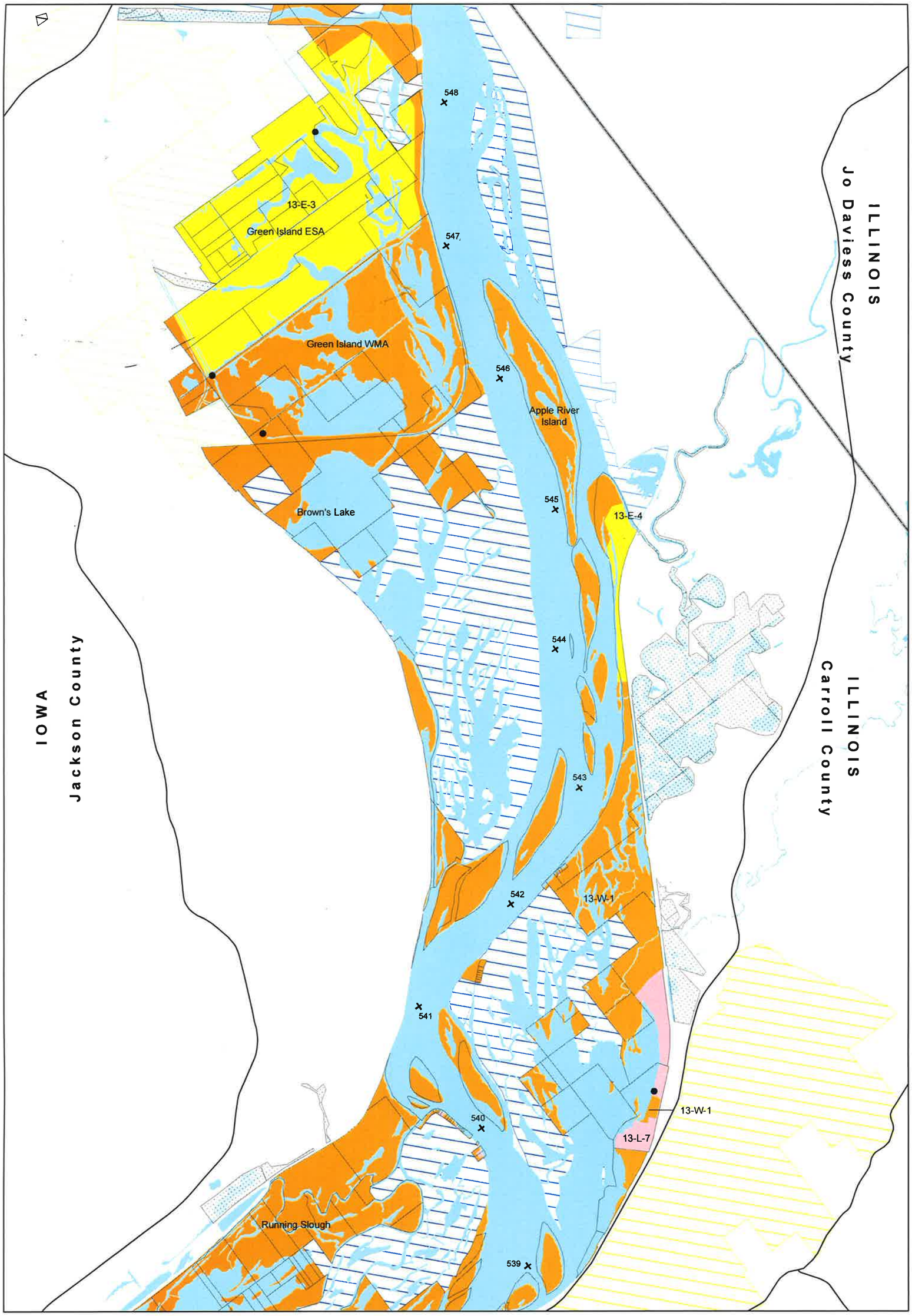
The Refuge is requesting an agency meeting separate from the public scoping meeting to discuss our concerns.

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



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

Master Plan Land Classification*

- 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

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

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

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.

Page 16, Section 3.8.7 – 2018 Unionid Survey: "EcoAnalysts 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."

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 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.

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.

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.

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

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

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

August 8, 2024

SUBJECT: 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

Ms. Krystle McClain, NEPA Program Supervisor
USEPA Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Dear Ms. McClain:

The U.S. Army (Army) is initiating early coordination with your office pertaining to the subject Supplemental Environmental Impact Statement (SEIS) for resources under your purview. The Army will prepare the SEIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the SEIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) and (2) the LRA's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 environmental impact statement (EIS) evaluated the closure, and the Depot was officially closed in 2000. The subject SEIS will be supplemental to the 1997 EIS.

The Army originally initiated consultation with your office for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in November 2023. We thank you for your February 2, 2024, response. Based on information received during the EA scoping process, the Army determined that preparation of a SEIS would be appropriate. The Army will issue a Notice of Intent to prepare the SEIS later this year and will notify you of the beginning of the scoping process and of the public scoping meeting date and location.

At this time, the Army is initiating early coordination with you for the SEIS to request (1) your input on the Army holding an agency meeting separate from the public scoping meeting and (2) any comments you might have in addition to those you provided in your letter of February 2, 2024. The

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project remains unchanged from the description of it presented for the 2023 scoping. The remainder of this letter provides information on the project location and the proposed action and alternatives.

The 132-acre parcel is undeveloped land in Carroll County, IL (Enclosure 2, Site Map). The parcel includes Commander's Pond (formerly known as Ordnance School Lake). The parcel shares a border with the Upper Mississippi River National Wildlife and Fish Refuge (Enclosure 3, Map of Upper Mississippi River National Wildlife and Fish Refuge) and is bordered on the east and south by the Apple River, a tributary of the Mississippi River; the Mississippi River on the southwest; Vincent Road and Rofsteck Road on the west; and Crim Road on the north. While these rivers and roads form the boundaries of the parcel, they are not part of it. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by the 132-acre parcel, also is not part of the parcel to be transferred.

Since 2000, through the BRAC process, as former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, the Army has transferred them to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources (DNR), and the LRA. The Army already has transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west/northwest.

In 2016, USFWS withdrew interest in the 132-acre parcel of land (formerly known as Parcel FWS 5) at the southeastern end of SVADA. The Army officially identified the parcel as surplus in January 2018. The Army's proposed action is disposal of the parcel, which has been redesignated LRA Parcel 20, and transferring the property to the LRA.

The LRA's finalized 2023 reuse plan for the parcel is available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-1689879402.pdf, and the appendices to the plan are available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-appendices-1689879402.pdf. The LRA presents three conceptual reuse alternatives for developing LRA Parcel 20 in its plan, which focus on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development, under each alternative. 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 includes activities outside the boundary of LRA Parcel 20 in the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island. All the LRA's reuse alternatives would require dredging.

If you have input regarding an agency scoping meeting, resources of concern to your agency, or any questions concerning this BRAC action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2024.08.08 08:34:20 -04'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Travis Black, U.S. Department of Transportation, Maritime Administration, Director, Inland Waterways Gateway (St. Louis)
Mr. Ed Britton, USFWS, Upper Mississippi River National Wildlife and Fish Refuge, Savanna District Office
Ms. Jodi Creswell, USACE, Rock Island District, Chief, Environmental Planning Branch
Ms. Charlene Falco, Illinois Environmental Protection Agency, Project Manager, Federal Site Remediation Section, Bureau of Land
Ms. Nicole Goers, U.S. Environmental Protection Agency (USEPA) Region 5, Remedial Project Manager, Remedial Response Section 5
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. Bradley Hayes, Illinois DNR, Manager, Impact Assessment Section
Mr. William (Todd) Knuth, Savanna Army Depot Activity, Base Environmental Coordinator
Ms. Krystle McClain, USEPA Region 5, NEPA Program Supervisor
Mr. Kraig McPeek, USFWS Illinois-Iowa Ecological Services Field Office, Field Office Supervisor
Ms. Natalie Phelps Finnie, Illinois DNR, Director

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 fleet[1] 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 provided[3] 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 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 McPeek, 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 issues[5] 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 Cold [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 Cold [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 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)(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 Practices[12] report and the Community Guide to EJ and NEPA Methods[13] 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-GHG[16]) 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-CO_2) and other greenhouse gases (e.g., social cost of methane (SC-CH_4)) 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" spreadsheet[18] 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 emissions[19] 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 goals[20] 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 CO_2 are also relevant when assessing the climate damages resulting from GHG emissions. The social cost of carbon (SC-CO_2), social cost of methane (SC-CH_4), and social cost of nitrous oxide (SC-N_2O) 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 CO_2 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 CO_2-equivalent (CO_2e) estimates, and then monetize the climate impacts associated with each GHG using the corresponding social cost estimate (e.g., monetize CH_4 emissions changes expected to occur with the social cost of methane (SC-CH_4) 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. Recyling construction debris also preserves valuable landfill space and makes use of materials that have high embodied energy.

[21] Transforming gases into CO_2e using Global Warming Potential (GWP) metrics, and then multiplying the CO_2e tons by the SC-CO_2, is not as accurate as a direct calculation of the social costs of non-CO_2 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 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 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) WATERS[22]: https://www.epa.gov/waterdata/waters-watershed-assessment-tracking-environmental-results-system
   b) Envirofacts[23]: https://www3.epa.gov/enviro/facts/multisystem.html
   c) EJSCREEN: https://www.epa.gov/ejscreen
   d) NEPAssist: 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.

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[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.

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

August 8, 2024

SUBJECT: 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

Ms. Nicole Goers, Remedial Project Manager, Remedial Response Section 5
USEPA Region 5
77 West Jackson Blvd.
Chicago, IL 60604

Dear Ms. Goers:

The U.S. Army (Army) is initiating early coordination with your office pertaining to the subject Supplemental Environmental Impact Statement (SEIS) for resources under your purview. The Army will prepare the SEIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the SEIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) and (2) the LRA's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 environmental impact statement (EIS) evaluated the closure, and the Depot was officially closed in 2000. The subject SEIS will be supplemental to the 1997 EIS.

The Army originally initiated consultation with your office for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in December 2023. Based on information received during the EA scoping process, the Army determined that preparation of a SEIS would be appropriate. The Army will issue a Notice of Intent to prepare the SEIS later this year and will notify you of the beginning of the scoping process and of the public scoping meeting date and location.

At this time, the Army is initiating early coordination with you for the SEIS to request (1) your input on the Army holding an agency meeting separate from the public scoping meeting and (2) any comments you might have.

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The project remains unchanged from the description of it presented for the 2023 scoping. The remainder of this letter provides information on the project location and the proposed action and alternatives.

The 132-acre parcel is undeveloped land in Carroll County, IL (Enclosure 2, Site Map). The parcel includes Commander's Pond (formerly known as Ordnance School Lake). The parcel shares a border with the Upper Mississippi River National Wildlife and Fish Refuge (Enclosure 3, Map of Upper Mississippi River National Wildlife and Fish Refuge) and is bordered on the east and south by the Apple River, a tributary of the Mississippi River; the Mississippi River on the southwest; Vincent Road and Rofsteck Road on the west; and Crim Road on the north. While these rivers and roads form the boundaries of the parcel, they are not part of it. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by the 132-acre parcel, also is not part of the parcel to be transferred.

Since 2000, through the BRAC process, as former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, the Army has transferred them to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources (DNR), and the LRA. The Army already has transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west/northwest.

In 2016, USFWS withdrew interest in the 132-acre parcel of land (formerly known as Parcel FWS 5) at the southeastern end of SVADA. The Army officially identified the parcel as surplus in January 2018. The Army's proposed action is disposal of the parcel, which has been redesignated LRA Parcel 20, and transferring the property to the LRA.

The LRA's finalized 2023 reuse plan for the parcel is available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-1689879402.pdf, and the appendices to the plan are available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-appendices-1689879402.pdf. The LRA presents three conceptual reuse alternatives for developing LRA Parcel 20 in its plan, which focus on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development, under each alternative. 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 includes activities outside the boundary of LRA Parcel 20 in the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island. All the LRA's reuse alternatives would require dredging.

If you have input regarding an agency scoping meeting, resources of concern to your agency, or any questions concerning this BRAC action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2024.08.08 08:34:20 -04'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Travis Black, U.S. Department of Transportation, Maritime Administration, Director, Inland Waterways Gateway (St. Louis)
Mr. Ed Britton, USFWS, Upper Mississippi River National Wildlife and Fish Refuge, Savanna District Office
Ms. Jodi Creswell, USACE, Rock Island District, Chief, Environmental Planning Branch
Ms. Charlene Falco, Illinois Environmental Protection Agency, Project Manager, Federal Site Remediation Section, Bureau of Land
Ms. Nicole Goers, U.S. Environmental Protection Agency (USEPA) Region 5, Remedial Project Manager, Remedial Response Section 5
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. Bradley Hayes, Illinois DNR, Manager, Impact Assessment Section
Mr. William (Todd) Knuth, Savanna Army Depot Activity, Base Environmental Coordinator
Ms. Krystle McClain, USEPA Region 5, NEPA Program Supervisor
Mr. Kraig McPeek, USFWS Illinois-Iowa Ecological Services Field Office, Field Office Supervisor
Ms. Natalie Phelps Finnie, Illinois DNR, Director

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

August 8, 2024

SUBJECT: 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

Ms. Jodi Creswell, Chief, Environmental Planning Branch
USACE, Rock Island District
PO Box 2004
Rock Island, IL 61204

Dear Ms. Creswell:

The U.S. Army (Army) is initiating early coordination with your office pertaining to the subject Supplemental Environmental Impact Statement (SEIS) for resources under your purview, including under Section 10 of the Rivers and Harbors Act, Section 404 of the Clean Water Act, and the Section 408 Program. The Army will prepare the SEIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the SEIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) and (2) the LRA's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 environmental impact statement (EIS) evaluated the closure, and the Depot was officially closed in 2000. The subject SEIS will be supplemental to the 1997 EIS.

The Army originally initiated consultation with your office for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in November 2023. We thank you for your January 16, 2024, response. Based on information received during the EA scoping process, the Army determined that preparation of a SEIS would be appropriate. The Army will issue a Notice of Intent to prepare the SEIS later this year and will notify you of the beginning of the scoping process and of the public scoping meeting date and location.

At this time, the Army is initiating early coordination with you for the SEIS to request (1) your input on the Army holding an agency meeting separate from the public scoping meeting and (2) any comments you might have in addition to those you provided in your letter of January 16, 2024. The

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project remains unchanged from the description of it presented for the 2023 scoping. The remainder of this letter provides information on the project location and the proposed action and alternatives.

The 132-acre parcel is undeveloped land in Carroll County, IL (Enclosure 2, Site Map). The parcel includes Commander's Pond (formerly known as Ordnance School Lake). The parcel shares a border with the Upper Mississippi River National Wildlife and Fish Refuge (Enclosure 3, Map of Upper Mississippi River National Wildlife and Fish Refuge) and is bordered on the east and south by the Apple River, a tributary of the Mississippi River; the Mississippi River on the southwest; Vincent Road and Rofsteck Road on the west; and Crim Road on the north. While these rivers and roads form the boundaries of the parcel, they are not part of it. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by the 132-acre parcel, also is not part of the parcel to be transferred.

Since 2000, through the BRAC process, as former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, the Army has transferred them to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources (DNR), and the LRA. The Army already has transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west/northwest.

In 2016, USFWS withdrew interest in the 132-acre parcel of land (formerly known as Parcel FWS 5) at the southeastern end of SVADA. The Army officially identified the parcel as surplus in January 2018. The Army's proposed action is disposal of the parcel, which has been redesignated LRA Parcel 20, and transferring the property to the LRA.

The LRA's finalized 2023 reuse plan for the parcel is available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-1689879402.pdf, and the appendices to the plan are available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-appendices-1689879402.pdf. The LRA presents three conceptual reuse alternatives for developing LRA Parcel 20 in its plan, which focus on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development, under each alternative. 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 includes activities outside the boundary of LRA Parcel 20 in the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island. All the LRA's reuse alternatives would require dredging.

If you have input regarding an agency scoping meeting, resources of concern to your agency, or any questions concerning this BRAC action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter.

Sincerely,

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Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Travis Black, U.S. Department of Transportation, Maritime Administration, Director, Inland Waterways Gateway (St. Louis)
Mr. Ed Britton, USFWS, Upper Mississippi River National Wildlife and Fish Refuge, Savanna District Office
Ms. Jodi Creswell, USACE, Rock Island District, Chief, Environmental Planning Branch
Ms. Charlene Falco, Illinois Environmental Protection Agency, Project Manager, Federal Site Remediation Section, Bureau of Land
Ms. Nicole Goers, U.S. Environmental Protection Agency (USEPA) Region 5, Remedial Project Manager, Remedial Response Section 5
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Ms. Krystle McClain, USEPA Region 5, NEPA Program Supervisor
Mr. Kraig McPeek, USFWS Illinois-Iowa Ecological Services Field Office, Field Office Supervisor
Ms. Natalie Phelps Finnie, Illinois DNR, Director

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,

Jodi K. Creswell
Chief, Environmental Planning Branch

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

August 8, 2024

SUBJECT: 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

Mr. Travis Black, Director, Inland Waterways Gateway Office (St. Louis)
US DOT, MARAD, Office of Maritime & Intermodal Outreach
1222 Spruce St., Suite 2.202F
St. Louis, MO 63103

Dear Mr. Black:

The U.S. Army (Army) is initiating early coordination with your office pertaining to the subject Supplemental Environmental Impact Statement (SEIS) for resources under your purview. The Army will prepare the SEIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the SEIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) and (2) the LRA's secondary indirect action of reuse of the parcel.

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The Army originally initiated consultation with your office for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in November 2023. We thank you for your December 20, 2023, response. Based on information received during the EA scoping process, the Army determined that preparation of a SEIS would be appropriate. The Army will issue a Notice of Intent to prepare the SEIS later this year and will notify you of the beginning of the scoping process and of the public scoping meeting date and location.

At this time, the Army is initiating early coordination with you for the SEIS to request (1) your input on the Army holding an agency meeting separate from the public scoping meeting and (2) any comments you might have in addition to those you provided in your letter of December 20, 2023. The

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Sincerely,

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Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Travis Black, U.S. Department of Transportation, Maritime Administration, Director, Inland Waterways Gateway (St. Louis)
Mr. Ed Britton, USFWS, Upper Mississippi River National Wildlife and Fish Refuge, Savanna District Office
Ms. Jodi Creswell, USACE, Rock Island District, Chief, Environmental Planning Branch
Ms. Charlene Falco, Illinois Environmental Protection Agency, Project Manager, Federal Site Remediation Section, Bureau of Land
Ms. Nicole Goers, U.S. Environmental Protection Agency (USEPA) Region 5, Remedial Project Manager, Remedial Response Section 5
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. Bradley Hayes, Illinois DNR, Manager, Impact Assessment Section
Mr. William (Todd) Knuth, Savanna Army Depot Activity, Base Environmental Coordinator
Ms. Krystle McClain, USEPA Region 5, NEPA Program Supervisor
Mr. Kraig McPeek, USFWS Illinois-Iowa Ecological Services Field Office, Field Office Supervisor
Ms. Natalie Phelps Finnie, Illinois DNR, Director

From: Michelle.Cannella@tetratech.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

> You don't often get email from travis.black@dot.gov. Learn why this is important

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

August 8, 2024

SUBJECT: 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

REFERENCE: EcoCAT Review #2408046

Mr. Bradley Hayes, Manager, Impact Assessment Section
Illinois Department of Natural Resources
Div. of Real Estate Services & Consultation, Office of Realty & Capital Planning
1 Natural Resources Way
Springfield, IL 62702

Dear Mr. Hayes:

The U.S. Army (Army) is initiating early coordination with your office pertaining to the subject Supplemental Environmental Impact Statement (SEIS) for resources under your purview. The Army will prepare the SEIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the SEIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) and (2) the LRA's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 environmental impact statement (EIS) evaluated the closure, and the Depot was officially closed in 2000. The subject SEIS will be supplemental to the 1997 EIS.

The Army originally initiated consultation with your office for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in November 2023. We thank you for your January 30, 2024, response. Based on information received during the EA scoping process, the Army determined that preparation of a SEIS would be appropriate. The Army will issue a Notice of Intent to prepare the SEIS later this year and will notify you of the beginning of the scoping process and of the public scoping meeting date and location.

At this time, the Army is initiating early coordination with you for the SEIS to request (1) your input on the Army holding an agency meeting separate from the public scoping meeting and (2) any comments you might have in addition to those you provided in your letter of January 30, 2024. The

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project remains unchanged from the description of it presented for the 2023 scoping. The remainder of this letter provides information on the project location and the proposed action and alternatives.

The 132-acre parcel is undeveloped land in Carroll County, IL (Enclosure 2, Site Map). The parcel includes Commander's Pond (formerly known as Ordnance School Lake). The parcel shares a border with the Upper Mississippi River National Wildlife and Fish Refuge (Enclosure 3, Map of Upper Mississippi River National Wildlife and Fish Refuge) and is bordered on the east and south by the Apple River, a tributary of the Mississippi River; the Mississippi River on the southwest; Vincent Road and Rofsteck Road on the west; and Crim Road on the north. While these rivers and roads form the boundaries of the parcel, they are not part of it. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by the 132-acre parcel, also is not part of the parcel to be transferred.

Since 2000, through the BRAC process, as former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, the Army has transferred them to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources (DNR), and the LRA. The Army already has transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west/northwest.

In 2016, USFWS withdrew interest in the 132-acre parcel of land (formerly known as Parcel FWS 5) at the southeastern end of SVADA. The Army officially identified the parcel as surplus in January 2018. The Army's proposed action is disposal of the parcel, which has been redesignated LRA Parcel 20, and transferring the property to the LRA.

The LRA's finalized 2023 reuse plan for the parcel is available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-1689879402.pdf, and the appendices to the plan are available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-appendices-1689879402.pdf. The LRA presents three conceptual reuse alternatives for developing LRA Parcel 20 in its plan, which focus on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development, under each alternative. 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 includes activities outside the boundary of LRA Parcel 20 in the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island. All the LRA's reuse alternatives would require dredging.

If you have input regarding an agency scoping meeting, resources of concern to your agency, or any questions concerning this BRAC action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2024.08.08 08:34:20 -04'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Travis Black, U.S. Department of Transportation, Maritime Administration, Director, Inland Waterways Gateway (St. Louis)
Mr. Ed Britton, USFWS, Upper Mississippi River National Wildlife and Fish Refuge, Savanna District Office
Ms. Jodi Creswell, USACE, Rock Island District, Chief, Environmental Planning Branch
Ms. Charlene Falco, Illinois Environmental Protection Agency, Project Manager, Federal Site Remediation Section, Bureau of Land
Ms. Nicole Goers, U.S. Environmental Protection Agency (USEPA) Region 5, Remedial Project Manager, Remedial Response Section 5
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. Bradley Hayes, Illinois DNR, Manager, Impact Assessment Section
Mr. William (Todd) Knuth, Savanna Army Depot Activity, Base Environmental Coordinator
Ms. Krystle McClain, USEPA Region 5, NEPA Program Supervisor
Mr. Kraig McPeek, USFWS Illinois-Iowa Ecological Services Field Office, Field Office Supervisor
Ms. Natalie Phelps Finnie, Illinois DNR, Director

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

August 8, 2024

SUBJECT: 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

REFERENCE: EcoCAT Review #2408046

Ms. Natalie Phelps Finnie, Director
Illinois Department of Natural Resources
1 Natural Resources Way
Springfield, IL 62702

Dear Ms. Phelps Finnie:

The U.S. Army (Army) is initiating early coordination with your office pertaining to the subject Supplemental Environmental Impact Statement (SEIS) for resources under your purview. The Army will prepare the SEIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the SEIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) and (2) the LRA's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 environmental impact statement (EIS) evaluated the closure, and the Depot was officially closed in 2000. The subject SEIS will be supplemental to the 1997 EIS.

The Army originally initiated consultation with your office for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in November 2023. We thank you for the response from Mr. Bradley Hayes of the Illinois Department of Natural Resources (DNR) regarding EcoCAT on January 30, 2024. Based on information received during the EA scoping process, the Army determined that preparation of a SEIS would be appropriate. The Army will issue a Notice of Intent to prepare the SEIS later this year and will notify you of the beginning of the scoping process and of the public scoping meeting date and location.

At this time, the Army is initiating early coordination with you for the SEIS to request (1) your input on the Army holding an agency meeting separate from the public scoping meeting and (2) any comments you might have in addition to those provided in the letter of January 30, 2024. The

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The LRA's finalized 2023 reuse plan for the parcel is available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-1689879402.pdf, and the appendices to the plan are available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-appendices-1689879402.pdf. The LRA presents three conceptual reuse alternatives for developing LRA Parcel 20 in its plan, which focus on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development, under each alternative. 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 includes activities outside the boundary of LRA Parcel 20 in the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island. All the LRA's reuse alternatives would require dredging.

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Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

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DEPARTMENT OF THE ARMY
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600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

August 8, 2024

SUBJECT: 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

REFERENCE: 0158100002-Carroll County, SVADA, Superfund/Technical Reports

Ms. Charlene Falco, Project Manager
Illinois EPA, Bureau of Land, Federal Site Remediation Section
1021 North Grand Avenue East
PO Box 19276
Springfield, IL 62794

Dear Ms. Falco:

The U.S. Army (Army) is initiating early coordination with your office pertaining to the subject Supplemental Environmental Impact Statement (SEIS) for resources under your purview. The Army will prepare the SEIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the SEIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) and (2) the LRA's secondary indirect action of reuse of the parcel.

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LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2024.08.08 08:34:20 -04'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

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Mr. Ed Britton, USFWS, Upper Mississippi River National Wildlife and Fish Refuge, Savanna District Office
Ms. Jodi Creswell, USACE, Rock Island District, Chief, Environmental Planning Branch
Ms. Charlene Falco, Illinois Environmental Protection Agency, Project Manager, Federal Site Remediation Section, Bureau of Land
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Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. Bradley Hayes, Illinois DNR, Manager, Impact Assessment Section
Mr. William (Todd) Knuth, Savanna Army Depot Activity, Base Environmental Coordinator
Ms. Krystle McClain, USEPA Region 5, NEPA Program Supervisor
Mr. Kraig McPeek, USFWS Illinois-Iowa Ecological Services Field Office, Field Office Supervisor
Ms. Natalie Phelps Finnie, Illinois DNR, Director

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

Charlene Falco
Project Manager
Federal Site Remediation Section
Bureau of Land

CAF:JS:PTL:p:\\SDVA\Parcel 20\Review_SEIS Coordianation_09 06 2024.docx

/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
1021 NORTH GRAND AVENUE EAST, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 • (217) 782-3397
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:

- 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

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

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

March 3, 2025

SUBJECT: Coordination 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

Mr. Zachary Krug, Illinois State Hazard Mitigation Officer
Illinois Emergency Management Agency
1035 Outer Park Drive
Springfield, IL 62704

Dear Mr. Krug:

The U.S. Army (Army) is initiating coordination with your office pertaining to the subject Environmental Impact Statement (EIS) for resources under your purview, such as areas designated as floodways. The U.S. Army Corps of Engineers (USACE), Rock Island District, recommended we contact your office regarding the EIS. The Army will prepare the EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois, and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) or other appropriate recipient, and (2) the LRA's or other recipient's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 EIS evaluated the closure, and the Depot was officially closed in 2000. The subject EIS will tier from the 1997 EIS. The 1997 BRAC EIS evaluated the 132-acre parcel for transfer under a federal-to-federal conveyance to U.S. Fish and Wildlife Service (USFWS), but it did not evaluate the parcel for disposal and transfer to and reuse by the LRA or other appropriate recipients.

The 132-acre parcel is undeveloped land in Carroll County, IL (Enclosure 2, Site Map and Enclosure 3, Navigation Channel Map). The parcel includes Commander's Pond (formerly known as Ordnance School Lake). The parcel shares a border with the Upper Mississippi River National Wildlife and Fish Refuge (Enclosure 4, Map of Upper Mississippi River National Wildlife and Fish Refuge) and is bordered on the east and south by the Apple River, a tributary of the Mississippi River; the Mississippi River on the southwest; Vincent Road and Rofsteck Road on the west; and Army Depot Road/Crim Drive on the north. While these rivers and roads form the boundaries of the parcel, they are not part of it. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast but is not part of the parcel to be transferred (Enclosure 4). A sewage treatment plant owned by the Army, which is surrounded by the 132-acre parcel, also is not part of the parcel to be transferred.

Since 2000, through the BRAC process, as former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, the Army has transferred them to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the USFWS and the remainder to the USACE, the Illinois Department of Natural Resources, and the LRA. The Army already has transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west/northwest (Enclosure 2).

In 2016, USFWS withdrew interest in the 132-acre parcel of land (formerly known as Parcel FWS 5) at the southeastern end of SVADA. The Army officially identified the parcel as surplus in January 2018. The Army's proposed action is disposal of the parcel, which has been redesignated LRA Parcel 20, and transferring the property to the LRA or other appropriate recipient.

The LRA's 2023 reuse plan for LRA Parcel 20 and additional information regarding the disposal and reuse of the parcel is available at Base Realignment and Closure (BRAC) > Great Lakes and Ohio River Division > Programs. In its plan, the LRA presents a conceptual reuse alternative to be implemented in three phases for developing LRA Parcel 20, which focuses on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development under each phase. To facilitate implementation, the LRA would implement the phases sequentially. Phase 1 could be implemented within a target 5-year completion window, while phases 2 and 3 could follow, with both having 5-year-plus completion windows. The LRA's proposed reuse includes activities outside the boundary of LRA Parcel 20 in the Apple River, Brickhouse Slough, and Mississippi River and along Apple River Island. All of the LRA's reuse phases would require dredging.

In addition to the LRA's proposed reuse alternative, the EIS also will evaluate a recreation-only reuse alternative and a recreation and solar reuse alternative, which involve only those recreation or solar elements on LRA Parcel 20 as described in the LRA's 2023 reuse plan.

If you have input regarding resources of concern to your agency, or any questions concerning this BRAC action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter.

Sincerely,

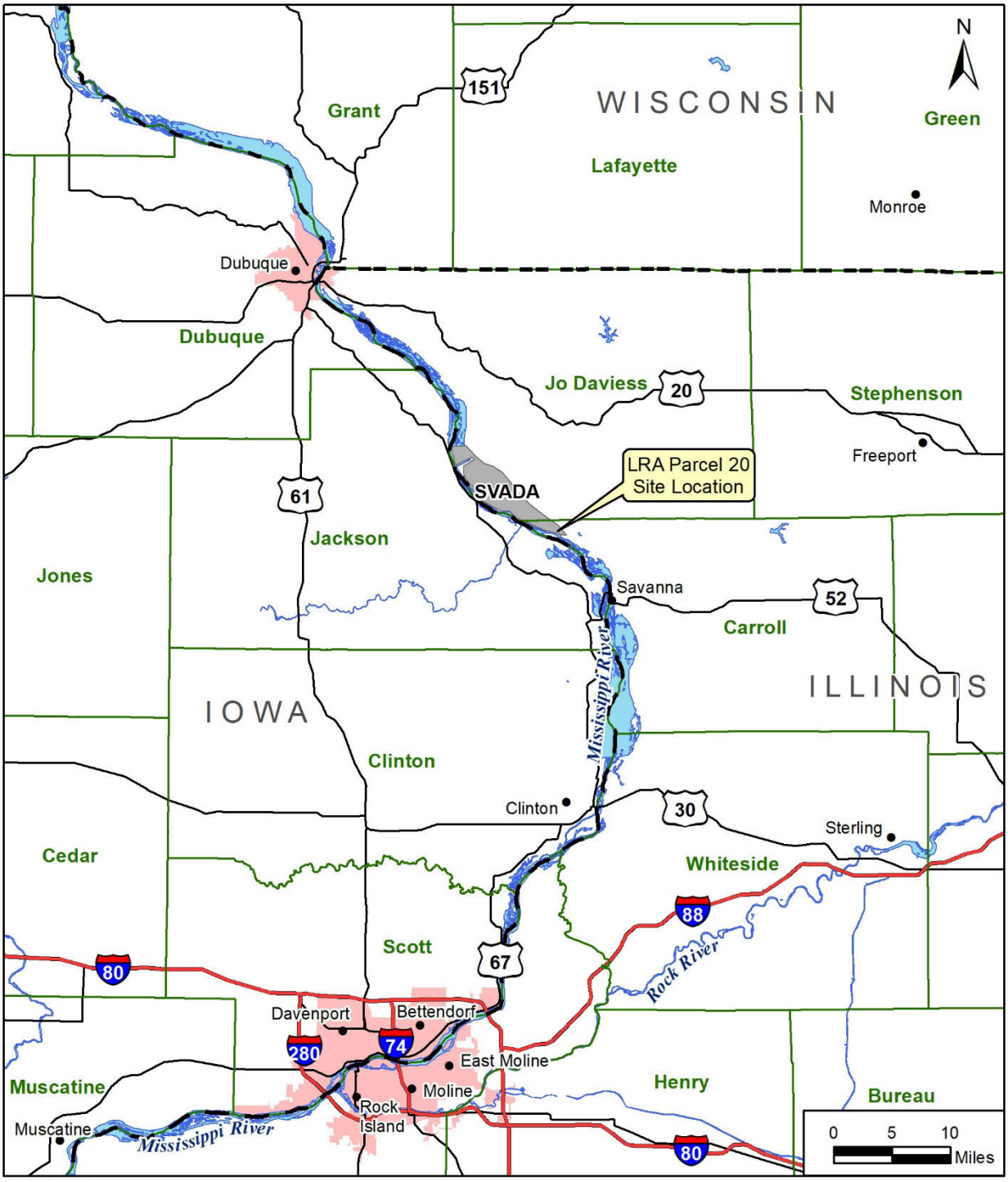
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Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Ms. Jodi Creswell, USACE, Rock Island District, Chief, Environmental Planning Branch
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Savanna Army Depot Activity, Base Environmental Coordinator

Enclosure 1: Location Map



LEGEND

- State Boundary
- County Boundary
- Interstate Highway
- U.S. Route
- Urban Area
- Surface Water

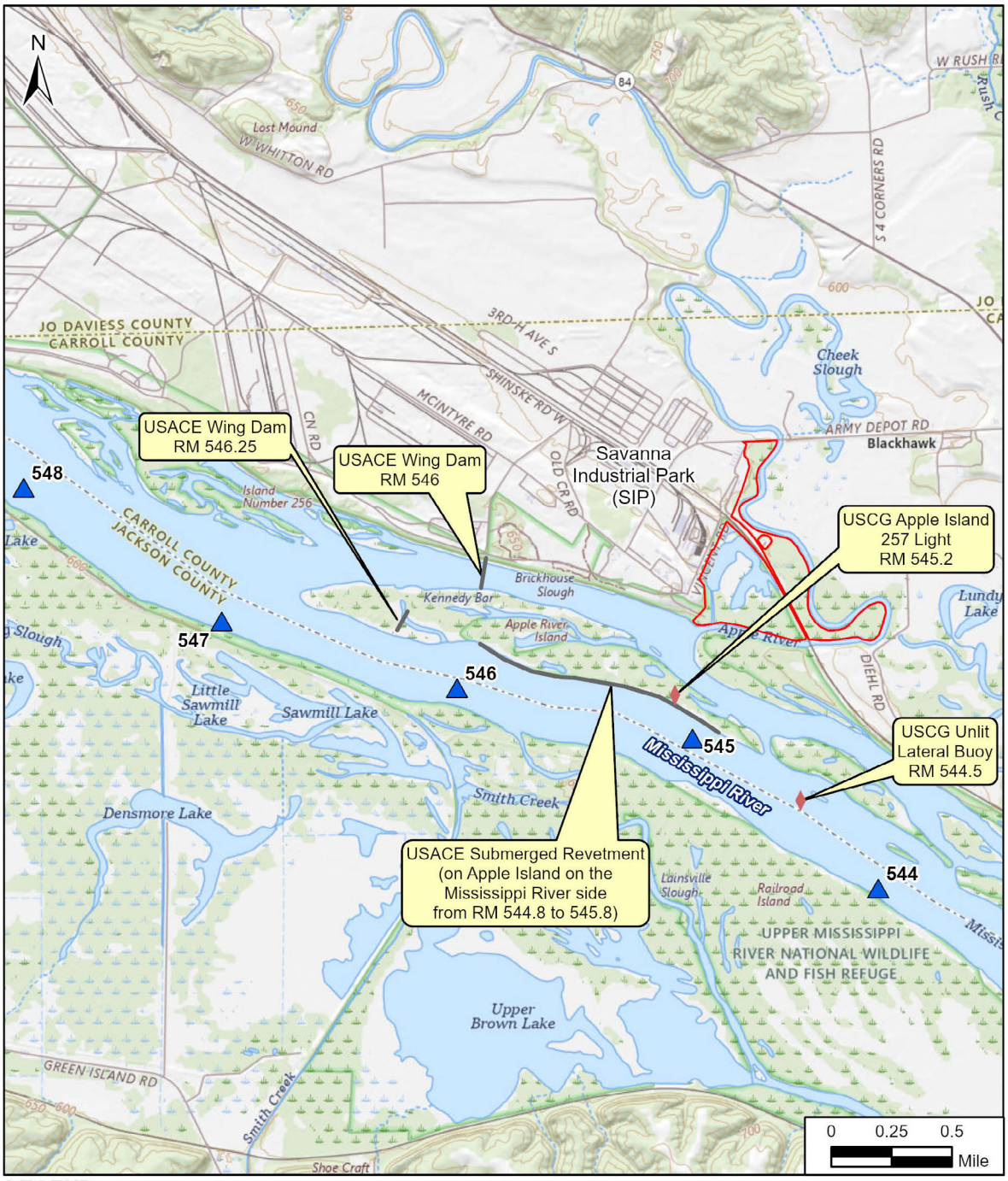
Enclosure 2: Site Map



LEGEND

LRA Parcel 20 Boundary

Enclosure 3: Navigation Channel Map



LEGEND

LRA Parcel 20 Boundary

River Mile Marker

Notes: Locations indicated are approximate. RM=River Mile. Sources: USACE Geospatial 2024, USGS National Map 2024.

Enclosure 4: Map of USFWS UMRNWFR



LEGEND

Parcel 20 Boundary

Upper Mississippi River National Wildlife and Fish Refuge

Upper Mississippi River National Wildlife and Fish Refuge

Note: Boundaries are approximate.

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

August 8, 2024

SUBJECT: 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

REFERENCE: ACHP Project #020363

Mr. Christopher Koeppel, Assistant Director, Office of Federal Agency Programs, Federal Property Management Section
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001

Dear Mr. Koeppel:

The U.S. Army (Army) is initiating early coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject Supplemental Environmental Impact Statement (SEIS). The Army will prepare the SEIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the SEIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) and (2) the potential effects of the LRA's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 environmental impact statement (EIS) evaluated the closure, and the Depot was officially closed in 2000. The subject SEIS will be supplemental to the 1997 EIS. In 2000, the *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* (2000 SVADA PA) (Enclosure 2, Programmatic Agreement) was executed in support of the 1997 EIS to ensure adequate consideration of the effect of the closure and disposal on historic properties.

The Army originally initiated consultation with your office for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in November 2023. We thank you for your December 21, 2023, response. Based on information received during the EA scoping process, the Army determined preparation of a SEIS would be appropriate. The Army will issue a Notice of Intent to prepare the SEIS later this year and will notify you of the beginning of the scoping process and of the public scoping meeting date and location.

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At this time, the Army is initiating early coordination with you for the SEIS to request (1) your input on the Army holding an agency meeting separate from the public scoping meeting and (2) any comments you might have in addition to those you provided in your letter of December 21, 2023. The project remains unchanged from the description of it presented for the 2023 scoping. The remainder of this letter provides information on the project location, the proposed action, and alternatives.

The 132-acre parcel is undeveloped land in Carroll County, IL (Enclosure 3, Site Map and Enclosure 4, Topographic Map). The parcel includes Commander's Pond (formerly known as Ordnance School Lake). The parcel is bordered on the east and south by the Apple River, a tributary of the Mississippi River; the Mississippi River on the southwest; Vincent Road and Rofsteck Road on the west; and Crim Road on the north. While these rivers and roads form the boundaries of the parcel, they are not part of it. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by the 132-acre parcel, also is not part of the parcel to be transferred.

Since 2000, through the BRAC process, as former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, the Army has transferred them to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the LRA. The Army already has transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west/northwest.

In 2016, USFWS withdrew interest in the 132-acre parcel of land (formerly known as Parcel FWS 5) at the southeastern end of SVADA. The Army officially identified the parcel as surplus in January 2018. The Army's proposed action is disposal of the parcel, which has been redesignated LRA Parcel 20, and transferring the property to the LRA. The Army has completed the following remediation at four contaminated cleanup sites on LRA Parcel 20:

- Site 20, Abandoned Landfill: Capped the landfill with "hot spot" removal (i.e., excavating soil containing chemicals of concern at concentrations above recreational remediation goals and buried drums and debris); transported the contaminated soil, drums, and debris to a regulated, licensed solid waste landfill for disposal; conducted site restoration; is conducting long-term monitoring of groundwater and surface water; is maintaining the engineered landfill cap; implemented land use controls that restrict site access, prohibit residential agricultural land use, and prevent intrusive activities; and will conduct further PFAS investigations.
- Site 73, Stables Landfill: Conducted surface debris removal, soil excavation, and off-site disposal.
- Site 130, Vincent Road Septic System: Conducted soil and groundwater sampling. The human health risks were determined to be acceptable for receptors and specified land uses and the preferred remedy was No Further Action.
- Site 178, Shop Area (Buildings 100–129) Sanitary and Stormwater Sewer Lines and Outfalls to Ordnance School Lake: Conducted soil and sediment excavation, off-site disposal, and implemented

LUCs to prevent the site from being used for purposes other than industrial/commercial and recreational.

The LRA's finalized 2023 reuse plan for the parcel is available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-1689879402.pdf, and the appendices to the plan are available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-appendices-1689879402.pdf. The LRA presents three conceptual reuse alternatives for developing LRA Parcel 20 in its plan, which focus on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development under each alternative. 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 includes activities outside the boundary of LRA Parcel 20 in the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island. All of the LRA's reuse alternatives would require dredging.

The 2000 SVADA PA is still in effect. A complete Phase I archaeological survey of LRA Parcel 20 was conducted by Brockington Associates (Brockington) in 2020. LRA Parcel 20 has no known buildings, structures, or traditional cultural properties currently listed in the National Register of Historic Places (NRHP). Two archaeological sites within LRA Parcel 20 (sites 11-CA-1 and 11-CA-142) are identified as potentially eligible for listing in the NRHP, and a third site (Site 11-CA-194) is not eligible (Enclosure 5, Archaeological Sites Map). Brockington provided the survey report to the Illinois State Historic Preservation Office (SHPO) on November 4, 2020. The SHPO responded in a letter dated December 24, 2020, that the project as proposed would have no adverse effect on the two potentially eligible sites and that Site 11-CA-194 is not eligible for listing in the NRHP, but that any plan modifications must include SHPO notification (Enclosure 6, SHPO letter dated December 24, 2020). Brockington finalized the *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois* in January 2021.

If any sites are determined to be NRHP eligible through additional archaeological testing within LRA Parcel 20, cultural resources encumbrances in the form of a preservation covenant will apply in perpetuity, as appropriate, based on the 2000 SVADA PA and in consultation with your office under NHPA Section 106 (Enclosure 7, Preservation Covenant).

If you have input regarding an agency scoping meeting, resources of concern to your agency, or any questions concerning this BRAC action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter.

Sincerely,

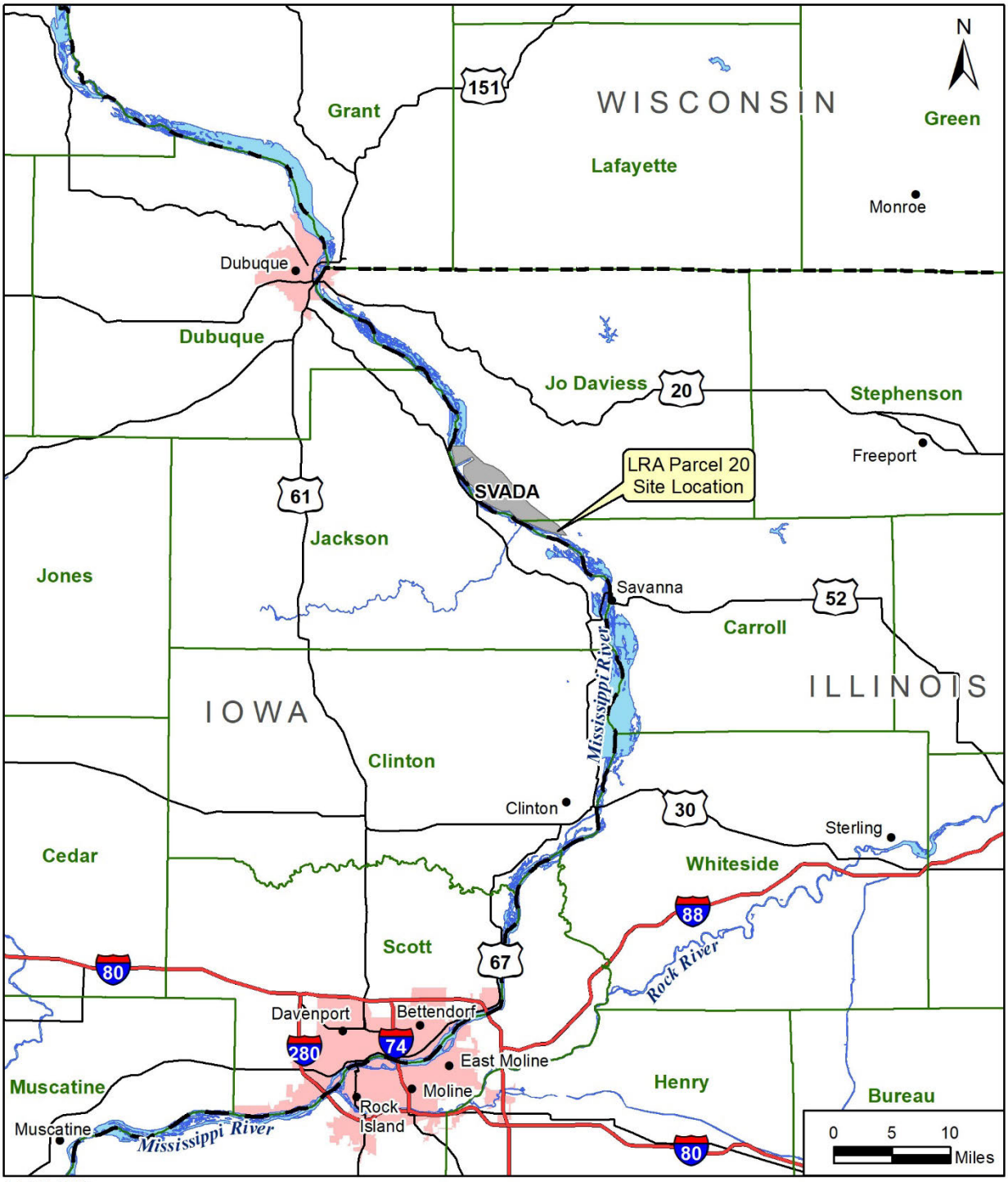
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Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Savanna Army Depot Activity, Base Environmental Coordinator
Ms. Carol (CJ) Wallace, Illinois DNR, State Historic Preservation Office, Cultural Resources Coordinator

Enclosure 1: Location Map



LEGEND

- State Boundary
- County Boundary
- Interstate Highway
- U.S. Route
- Urban Area
- Surface Water

Enclosure 2: Programmatic Agreement

DEPARTMENT OF DEFENSE
BASE TRANSITION FIELD OFFICE
Savanna Army Depot Activity
Savanna, Illinois 61074-9636

REPLY TO
ATTENTION OF

Base Transition Coordinator

25 Sep 2000

Mr. Tom McCulloch
Advisory Council on Historic Preservation
The Old Post Office Building
1100 Pennsylvania Avenue, NW, #809
Washington, DC 20004

Dear Mr. McCulloch:

Please find enclosed for Advisory Council signature, the cultural resource programmatic agreement (PA) for the closure and disposal of lands and buildings at Savanna Army Depot Activity (SVDA), Illinois. This PA, which you have previously reviewed, details how the Army will take into account, under Section 106 of the National Historic Preservation Act (NHPA), the effects of this disposal action on SVDA historic properties. All changes to the PA requested by your office and the Illinois SHPO have been made.

After your office has signed the PA, please forward a copy of the fully executed PA to Mr. James Davidson at the following address:

Commander, U.S. Army Material Command
ATTN: AMCQMA (James Davidson)
5001 Eisenhower Ave.
Alexandria, VA 22333-0001

Should you have any questions about the PA, the Army Material Command point of contact is Mr. James Davidson, at 703-617-5510. Technical questions concerning the PA should be directed to Dr. Neil Robison at 334-690-3018.

Thank you for your assistance in completing the NHPA Section 106 process for the Savanna Army Depot Activity. It has been a pleasure to work with you on this project.

Sincerely,

ARLEN J. DAHLMAN
Base Transition Coordinator

DEPARTMENT OF THE ARMY
HEADQUARTERS, U.S. ARMY MATERIEL COMMAND
5001 EISENHOWER AVENUE, ALEXANDRIA, VA 22333 - 0001

REPLY TO
ATTENTION OF
AMCQMA

August 28, 2000

Ms. Anne Haaker
Deputy State Historic Preservation Officer
Illinois Historic Preservation Agency
1 Old State Capitol Plaza
Springfield, IL 62701-1512

Dear Ms. Haaker:

Please find enclosed for your signature, the cultural resource programmatic agreement (PA) for the closure and disposal of lands and buildings at Savanna Army Depot Activity (SEDA), Illinois. This PA, which your office has previously reviewed, details how the Army will take into account, under Section 106 of the National Historic Preservation Act (NHPA), the effects of this disposal action on SEDA historic properties. All changes to the PA requested by your office and the Advisory Council have been made.

After you have signed the PA, please forward the document to Mr. Arlen J. Dahlman, the Base Transition Coordinator for the SEDA BRAC action. Mr. Dahlman will have Mr. John A. Moorehead, the executive director of the Jo Carroll Depot Local Redevelopment Authority sign the PA and will then forward the document to the Advisory Council for their signature. Mr. Dahlman's address is as follows:

Mr. Arlen J. Dahlman
Base Transition Coordinator
2750 Kinney Loop
Savanna, IL 61074

Should you have any questions about the PA, the Army Material Command point of contact is Mr. Jim Davidson, at 703-617-5510. Technical questions concerning the PA should be directed to Dr. Neil Robison at 334-690-3018.

Thank you for your assistance in completing the NHPA Section 106 process for the Savanna Army Depot Activity.

Sincerely,

DARYL H. POWELL

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

August 2000

Whereas the United States Army (Army) is responsible for implementation of applicable provisions of the Defense Base Closure and Realignment Act of 1990 (P.L. 101-510) as amended, and is proceeding with the closure of Savanna Army Depot Activity (SVDA), and consequent disposal of excess and surplus property in a manner consistent with the requirements of the applicable Defense Base Closure and Realignment Commission recommendation; and

Whereas the Army has determined that leasing, licensing and/or disposal of all or portions of SVDA, in Illinois, may have an effect upon historic properties that have been designated as eligible for listing in, the National Register of Historic Places, and has consulted with the Illinois State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation (Council) pursuant to 36 C.F.R. Part 800, regulations implementing Section 106 of the National Historic Preservation Act (16 U.S.C. Section 470(f), Section 110(f) of the same Act (16 U.S.C. Section 470h-2[f]), and Section 111 of the same Act (16 U.S.C. Section 470h-3); and

Whereas after real estate screening activities were conducted it was determined that SVDA surplus lands will be divided between the U.S. Fish and Wildlife Service, the U.S. Army Corps of Engineers, the Illinois Department of Natural Resources, and the Jo Carroll Depot Local Reuse Authority; and

Whereas the Army will conduct cultural resource inventory activities only for those lands to be transferred to non-federal entities; and

Whereas the Army has completed a number of historic architectural and archeological surveys (listed in Attachment A) to support

disposal of portions of the BRAC property to non-federal entities; and

Whereas none of the SVDA buildings to be conveyed to non-federal entities, examined by the 1997 architectural inventory study, were determined to be eligible for the National Register of Historic Places; and

Whereas a number of archeological sites located within those SVDA BRAC excess lands scheduled for disposal to non-federal entities have been determined to be eligible or potentially eligible for the National Register of Historic Places (listed in Attachment B); and

Whereas not all BRAC lands to be disposed of to non-federal entities can be surveyed for archeological resources until the lands have been examined for and, if necessary, cleared of unexploded ordnance (UXO); and

Whereas interested members of the public, including the Jo Carroll Depot Local Redevelopment Authority, and Native Americans, have been provided opportunities to comment on the effects this base closure may have on historic properties at SVDA through public hearings, consultation meetings, and other means; and

Whereas in carrying out the disposal of excess and surplus property the Army will comply with all applicable laws and regulations, including 36 C.F.R. Part 79, Curation of Federally-Owned and Administered Archeological Collections;

Whereas the Jo Carroll Depot Local Redevelopment Authority has been invited to concur in this agreement document; and

NOW, THEREFORE, the Army, the SHPO, and the Council agree that the undertaking described above shall be implemented in accordance with the following stipulations to take into account the effect of the undertaking on historic properties.

STIPULATIONS - The Army will ensure that the following measures are carried out:

I. Identification and Evaluation

A. The Army will conduct Phase I archeological site location surveys for those SVDA lands that are to be transferred to non-federal entities and that have not been previously surveyed for archeological resources (Appendix C map

displays those SVDA lands that will be surveyed for archeological resources).

B. For lands that must be examined for potential UXO contamination, archeological surveys will be conducted only after the area has been examined for UXO and has been determined as being safe for subsurface archeological testing. Due to explosive ordnance qualification requirements and safety factors, no archeologists will be made part of the actual UXO field survey and disposal teams. However, archeologists associated with the UXO contractor and the U.S. Army Corps of Engineers (USACE) will be available for consultations and to examine any archeological finds that may be made in the course of the UXO investigations. The following procedures will be followed by the UXO disposal teams that will conduct the UXO surveys.

1. Prior to the initiation of field investigations at SVDA, UXO survey personnel will receive a cultural resources orientation concerning known cultural resource sites within the project area and recognition of cultural resource artifactual materials that could be encountered by the UXO investigations.

2. UXO surveys will involve location of metallic objects by metal detectors and hand excavation of these metallic objects by UXO disposal experts. Non UXO related metallic objects and any other cultural items encountered by the investigators will be left on the ground surface adjacent to the hole from which they were removed for later examination and, if appropriate, collection during subsequent archeological surveys.

3. UXO field survey personnel will notify the SVDA BRAC Environmental Coordinator (BEC) and the contract or USACE archeologist of any cultural materials or human skeletal materials encountered during the UXO investigations. If human skeletal remains are encountered, UXO investigations will be immediately halted for that sampling grid and the SVDA BEC and USACE archeologist will make arrangements to determine the origin of the human remains and whether the requirements of the Native American Graves Protection and Repatriation Act (NAGPRA) should be enacted.

4. UXO related items encountered by the UXO disposal experts may be removed from the location where they are encountered for disposal or may be exploded *in situ*, if removal is considered to be too hazardous.

C. The Army will coordinate the findings and recommendations for all SVDA archeological surveys with the Illinois SHPO as the survey reports are completed.

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.

III. Licenses and Leases

Licenses or leases, to other than federal agencies, of historic properties will include language provided in Attachment D of this agreement as appropriate.

IV. Disposal of SVDA Properties

A. Transfer of Real Property That Does Not Contain Historic Properties

In leasing or disposing of real property and improvements--for which identification and evaluation have been completed in consultation with the SHPO--that do not contain historic properties, any portion of an historic property, archeological sites, or any portion of an archeological site, no further action is necessary under this agreement. The Army will, however, promptly notify the SHPO that such a transfer has been completed.

B. Assignments to Other Federal Agencies

In assigning historic property (ies) directly to another Federal agency by a transfer authority such as The Federal Property and Administrative Services Act of 1949, as amended (40 U.S.C. § 471 et seq.), the receiving Federal agency will be deemed responsible for compliance with 36 C.F.R. Part 800 and any other applicable state or Federal laws and regulations with respect to the maintenance and disposal of these properties. The Army will promptly notify the SHPO and Council in writing of each Federal agency that has requested and been assigned such property.

C. Public Benefit Conveyances to Non-Federal Recipients

In disposing of historic property(ies) directly to a non-Federal recipient - at the request of a sponsoring Federal agency, and pursuant to the Public Benefit Conveyance authorities contained in the Federal Property and Administrative Services Act of 1949, as amended (40 U.S.C. § 471 et seq.), and other applicable authorities - an appropriate preservation covenant (found at Attachment E) will be incorporated in the transfer instrument(s). The Army will promptly notify the SHPO and Council in writing of each such transfer of an archeological-site property.

D. Economic Development Conveyances to LRAs

In disposing of historic property(ies) to a Local Redevelopment Authority (LRA) pursuant to the Economic Development Conveyance authority contained in the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510, as amended), an appropriate preservation covenant (found at Attachment E) will be incorporated in the transfer instrument(s). The Army will promptly notify the SHPO and Council in writing of each such transfer of an archeological-site property.

E. Competitive Sales

In disposing of historic properties via a competitive sale transfer authority, the Army's bid solicitation will contain the following information:

(1) Information on the property's archeological significance, identifying elements, or other characteristics of the property that should be given special consideration in planning;

(2) Information on financial incentives for preservation of archeological properties;

(3) Information indicating that an appropriate preservation covenant will be incorporated in the instrument transferring title to the property, and that this covenant will be substantively identical to the one contained in Attachment E of this agreement (as appropriate), unless modifications are authorized pursuant to the process described in paragraph IV. G, below, and as required to accord the covenants with state law.

In developing the above information for inclusion in its initial bid solicitation document, the Army will solicit the advice and

assistance of the SHPO. The Army need not solicit such advice and assistance in preparing subsequent solicitation documents, unless such documents contain historic properties information that materially differs from that included in the initial solicitation document. The Army will notify the SHPO and Council in writing of each such transfer of an archeological-site property.

F. Negotiated Sales

In disposing of historic properties via a negotiated sale transfer authority, the Army will provide a written document ("negotiation document") to the negotiating party that sets forth the same information described in subparagraphs IV. E (1), (2) & (3), above. In developing this information for inclusion in the negotiation document to be provided to the initial negotiating party, the Army will solicit the advice and assistance of the SHPO. The Army need not solicit such advice and assistance in preparing negotiation documents for subsequent negotiating parties, unless such documents contain historic properties information that materially differs from that included in the document provided to the initial negotiating party. The Army will notify the SHPO and Council in writing of each such transfer of an archeological-site property.

G. Covenant Modification to Facilitate Transfer

If the Army cannot transfer the property or properties that contain National Register eligible archeological sites pursuant to the provisions set forth in paragraphs IV. C, D, E, and F above, then the Army will consult with the SHPO, the Council, and (with respect to transfers pursuant to paragraphs IV. C, D, and F) the prospective transferee(s) to determine appropriate modifications to the preservation covenant contained in Attachment E that are necessary in order to complete transfer of the property(ies) within established disposal timelines. Such modifications shall be limited to those that are reasonably necessary in order to effect transfer of, or effectively market, the concerned property within established timelines.

V. Environmental Remediation

A. UXO identification and removal will be handled as described in Stipulation I.B of this agreement document. As they are developed, the plans for other proposed environmental remediation activities will be reviewed by the SVDA BRAC Environmental Coordinator (BEC) to identify any effects to historic properties, known or yet to be discovered. If the Army determines that a proposed remediation activity will take place

less than 100 feet from a historic property and has the potential to affect that property, the Army will consult with the SHPO to determine what steps, if any, should be taken with respect to those effects.

B. Proposed remediation plans that the Army determines may affect historic properties will be submitted to the SHPO for review and comment in accordance with the following procedures:

(1) Proposed remediation plans or supplemental documentation furnished by the Army will provide descriptions of any potential conflicts between remediation and preservation of historic properties;

(2) In situations where the Army determines that there is an immediate threat to human health, safety, or the environment, and that remediation must proceed without first taking steps to preserve historic properties, then the Army's reasons for so determining will be fully described;

(3) In situations where the Army determines that there is not an immediate threat to human health, safety, or the environment, and that implementation of its proposed remediation plan will result in the destruction or substantial alteration of any historic property, then the Army shall either modify its remediation plan to avoid the adverse effect or implement data recovery and/or recordation in consultation with the SHPO, taking into account health and safety constraints inherent in properties containing hazardous materials, resource availability, and any other relevant constraints.

VI. Anti-Deficiency Act

The stipulations of this agreement are subject to the provisions of the Anti-Deficiency Act. If compliance with the Anti-Deficiency Act alters or impairs the Army's ability to implement the stipulations of this agreement, the Army will consult in accordance with the amendment and termination procedures found at Sections IX. and X. of this agreement.

VII. Status Reports

Until such time as all SVDA archeological properties have been transferred from Army control in accordance with the terms of this agreement, the Army will provide an annual status report

to the Council and Illinois SHPO to review implementation of the terms of this agreement and to determine whether amendments are needed. If amendments are needed, the signatories to this agreement will consult, in accordance with Stipulation IX. of this agreement, to make such revisions.

VIII. Dispute Resolution

A. Should the Illinois SHPO and/or the Council object within thirty (30) days to any plans or other documents provided by the Army or others for review pursuant to this agreement, or to any actions proposed or initiated by the Army pursuant to this agreement, the Army shall consult with the objecting party to resolve the objection. If the Army determines that the objection cannot be resolved, the Army shall forward all documentation relevant to the dispute to the Council. Within thirty (30) days after receipt of all pertinent documentation, the Council will either:

(1) Provide the Army with recommendations, which the Army will take into account in reaching a final decision regarding the dispute; or

(2) Notify the Army that it will comment pursuant to 36 C.F.R. 800.7(c), and proceed to comment.

Any Council comment will be taken into account by the Army in accordance with 36 C.F.R. 800.7(c)(4) with reference to the subject of the dispute.

B. Any recommendations or comment provided by the Council pursuant to Stipulation VIII. A above will pertain only to the subject of the dispute; the Army's responsibility to carry out all other actions under this agreement that are not the subjects of the dispute will remain unchanged.

C. At any time during implementation of the measures stipulated in this agreement by the Army, if an objection to any such measure or its manner of implementation is raised by interested persons, then the Army shall consider the objection and consult, as appropriate, with the objecting party, the SHPO, and the Council to attempt to resolve the objection.

IX. Amendments

A. The Army, Illnois SHPO, and/or Council may request that this PA be revised, whereby the parties will consult to consider whether such revision is necessary.

B. If it is determined that revisions to this PA are necessary, then the Army, the Council, and the SHPO shall consult pursuant to 36 C.F.R. 800.6(c)(7), as appropriate, to make such revisions. Except that, reviewing parties must comment on, or signify their acceptance of, the proposed changes to the PA in writing within 30 days of their receipt.

X. Termination of Agreement

A. The Army, Illnois SHPO, and/or Council may terminate this PA by providing thirty (30) days written notice to the other signatory parties. During the period after notification and prior to termination the Army, the Council, and the SHPO will consult to seek agreement on amendments or other actions that would avoid termination. In the event of termination, the Army will comply with 36 CFR Part 800.6(c)(8) with regard to individual undertakings associated with the BRAC disposal action.

Execution and implementation of this PA evidences that the Army has afforded the Council a reasonable opportunity to comment on the closure and disposal of excess and surplus property at SVDA, and that the Army has taken into account the effects of the undertaking on historic properties. Execution and compliance with this programmatic agreement fulfills the Army's Section 106 responsibilities regarding the closure and disposal of Savanna Army Depot Activity.

DEPARTMENT OF THE ARMY

By: Charles S. Mahan Jr. Date: 21 August 2000
Charles S. Mahan, Jr.
Major General, USA
Chief of Staff

ILLINOIS STATE HISTORIC PRESERVATION OFFICER

By: _____ Date: 9-20-00
Anne Haaker
Deputy State Historic Preservation Officer

ADVISORY COUNCIL ON HISTORIC PRESERVATION

By: John M. Fowler Date: 10/13/00
John Fowler
Executive Director

Concur:

JO CARROLL DEPOT LOCAL REDEVELOPMENT AUTHORITY

By: _____ Date: 9-25-00
John A. Morehead
Executive Director

ATTACHMENT A

Bibliography of Cultural Resource Studies Conducted to Support BRAC Disposal of Savanna Army Depot Activity Properties

Ball, Donald B.
1997 *A Cultural Resources Reconnaissance of A Proposed 164 Acre Prison Site, Savanna Army Depot Activity, Jo Daviess County, Illinois*. Report prepared by the U.S. Army Corps of Engineers, Louisville District.

Hardlines
1997 *Architectural Inventory of a Portion of the Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois*. A report prepared for the U.S. Army Corps of Engineers, Louisville District by Hardlines: Design and Delineation, a subcontractor of International Technology, Inc.

Miller, Orloff G., Sarah Adams, and E. Jeanne Harris
1999 *Phase I Archaeological Survey of ca. 212 Acres (85.8 hectares) at the Savanna Army Depot Activity, Carroll County Illinois*. A report prepared for the U.S. Army Corps of Engineers, Louisville District by Gray and Pape, Inc.

Whitman, Linda G. and Nathan Young
1998 *Phase I Literature Review and Archaeological Cultural Resource Survey of 210 Acres (85 ha) at Savanna Army Depot Activity, Carroll County, Illinois*. A report prepared for the U.S. Army Corps of Engineers, Louisville District by ASC Group, Inc., a subcontractor of the IT Corporation.

ATTACHMENT B

Savanna Army Depot Activity, Illinois
Known Historic Properties on or Eligible for
the National Register of Historic Places
that will be Disposed of to Non-Federal Entities

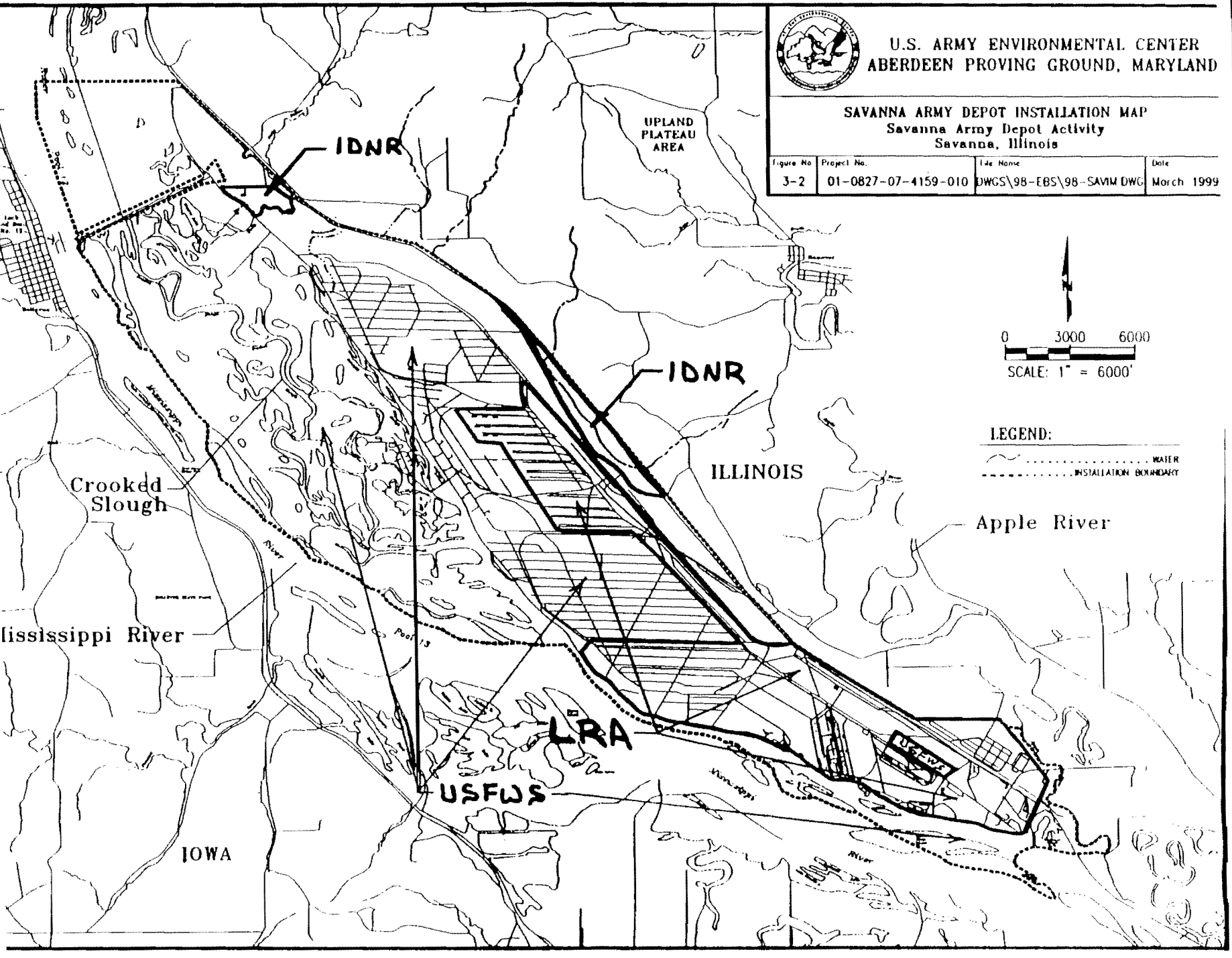
11CA1*
11CA2
11CA3+
11CA139*
11CA142
11CA143*
11CA147
11CA148
11CA149

* Lands making up this archeological site lie within two BRAC disposal parcels, one to be acquired by the local reuse authority and the other by the U.S. Fish and Wildlife Service.

+ The mounds formerly associated with this site have been destroyed, but the site may still have the potential to possess subsurface burials.

ATTACHMMENT C

Map Displaying the Location of
Savanna Army Depot Activity Lands to be
Transferred to Federal and
Non-Federal Entities


U.S. ARMY ENVIRONMENTAL CENTER
ABERDEEN PROVING GROUND, MARYLAND
SAVANNA ARMY DEPOT INSTALLATION MAP
Savanna Army Depot Activity
Savanna, Illinois
Figure No 3-2
Project No. 01-0827-07-4159-010
File Name DWGS\98-EBS\98-SAVIM.DWG
Date March 1999
IDNR
UPLAND PLATEAU AREA
IDNR
ILLINOIS
Crooked Slough
Apple River
lississippi River
Pool 13
LRA
USFWS
IOWA
0 3000 6000
SCALE: 1" = 6000'
LEGEND:
WATER
INSTALLATION BOUNDARY

ATTACHMENT D - **Language to be included in lease and license agreements when archeological sites are present.**

Archeological Property(ies) Lessee (License) Language

Archeological property(ies)XXX is/are (eligible for inclusion in/listed in) the National Register of Historic Places. The Lessee (Licensee) shall ensure that the property(ies) remain(s) undisturbed. The Lessee (Licensee) will notify the Army of any proposed ground disturbance to the archeological property prior to undertaking said ground disturbance. Notification will include a detailed description of the proposed undertaking. If the Army does not object to the proposal within 30 days of receipt of such notification and adequate supporting documentation, the Army will, with the assistance of the Lessee (Licensee), initiate consultation with the Illinois SHPO in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, "Protection of Historic Properties" (36 C.F.R. Part 800). The Lessee (Licensee) will not undertake the proposed action until the Army notifies the Lessee (Licensee) that the requirements of Section 106 have been fulfilled and the Lessee (Licensee) may proceed. If the Army objects to the Lessee's (Licensee's) proposed ground disturbance, the Lessee shall not undertake the proposed action.

ATTACHMENT E: STANDARD PRESERVATION COVENANT FOR CONVEYANCE OF PROPERTY THAT INCLUDES ARCHEOLOGICAL SITES

1. In consideration of the conveyance of the real property that includes the [official number(s) designation of archeological site(s)] located in the County of [name of county], Illinois, which is more fully described as [insert legal description], [Name of property recipient] hereby covenants on behalf of [himself/herself/itself], [his/her/its] heirs, successors, and assigns at all times to the Illinois State Historic Preservation Officer (SHPO), to maintain and preserve [official number(s) designation of archeological site(s)], in accordance with the provisions of paragraphs 2 through 11 of this covenant.

2. (Name of property recipient) will notify the Illinois SHPO in writing prior to undertaking any disturbance of the ground surface or any other action on [official number(s) designation of archeological site(s)] that would affect the physical integrity of this/these site(s). Such notice shall describe in reasonable detail the proposed undertaking and its expected effect on the physical integrity of [official number(s) designation of archeological site(s)].

3. Within thirty (30) calendar days of the Illinois SHPO's receipt of notification provided by (name of property recipient) pursuant to paragraph 2 of this covenant, the SHPO will respond to (name of property recipient) in writing as follows:

(a) That (name of property recipient) may proceed with the proposed undertaking without further consultation; or

(b) That (name of property recipient) must initiate and complete consultation with the Illinois SHPO before (he/she/it) can proceed with the proposed undertaking.

If the Illinois SHPO fails to respond to the (name of property recipient)'s written notice within thirty (30) calendar days of the SHPO's receipt of the same, then (name of property recipient) may proceed with the proposed undertaking without further consultation with the SHPO.

4. If the response provided to (name of property recipient) by the Illinois SHPO pursuant to paragraph 3 of this covenant requires consultation with the SHPO, then both parties will so consult in good faith to arrive at mutually-agreeable and appropriate measures that (name of property recipient) will employ to mitigate any adverse effects associated with the proposed undertaking. If the parties are unable to arrive at such mutually-agreeable mitigation measures, then (name of property recipient) shall, at a minimum, undertake recordation

for the concerned property--in accordance with the Secretary of Interior's standards for recordation and any applicable state standards for recordation, or in accordance with such other standards to which the parties may mutually agree--prior to proceeding with the proposed undertaking. Pursuant to this covenant, any mitigation measures to which (name of property recipient) and the SHPO mutually agree, or any recordation that may be required, shall be carried out solely at the expense of (name of property recipient).

5. [Name of recipient] shall make every reasonable effort to prohibit any person from vandalizing or otherwise disturbing any archeological site determined by the Illinois SHPO to be eligible for inclusion in the National Register of Historic Places. Any such vandalization or disturbance shall be promptly reported to the Illinois SHPO.

6. The Illinois SHPO shall be permitted at all reasonable time to inspect [parcel designation] in order to ascertain its condition and to fulfill its responsibilities hereunder.

7. In the event of a violation of this covenant, and in addition to any remedy now or hereafter provided by law, the Illinois SHPO may, following reasonable notice to [name of recipient], institute suit to enjoin said violation or to require the restoration of any archeological site affected by such violation.

8. [Name of recipient] agrees that the Illinois SHPO may, at its discretion, after 30 days notice to [name of recipient], convey and assign all or part of its rights and responsibilities contained in this covenant to a third party.

9. This covenant is binding on [name of recipient], [his/her/its] heirs, successors, and assigns in perpetuity. Restrictions, stipulations, and covenants contained herein shall be inserted by [name of recipient] verbatim or by express reference in any deed or other legal instrument by which [he/she/it] divests [himself/herself/itself] of either the fee simple title or any other lesser estate in [parcel designation] or any part thereof.

10. The failure of the Illinois SHPO to exercise any right or remedy granted under this instrument shall not have the effect of waiving or limiting the exercise of any other right or remedy or the use of such right or remedy at any other time.

11. The covenant shall be a binding servitude upon the real property that includes [official number(s) designation of archeological site(s)] and shall be deemed to run with the land. Execution of this covenant shall constitute conclusive evidence

that [name of recipient] agrees to be bound by the foregoing conditions and restrictions and to perform the obligations herein set forth.

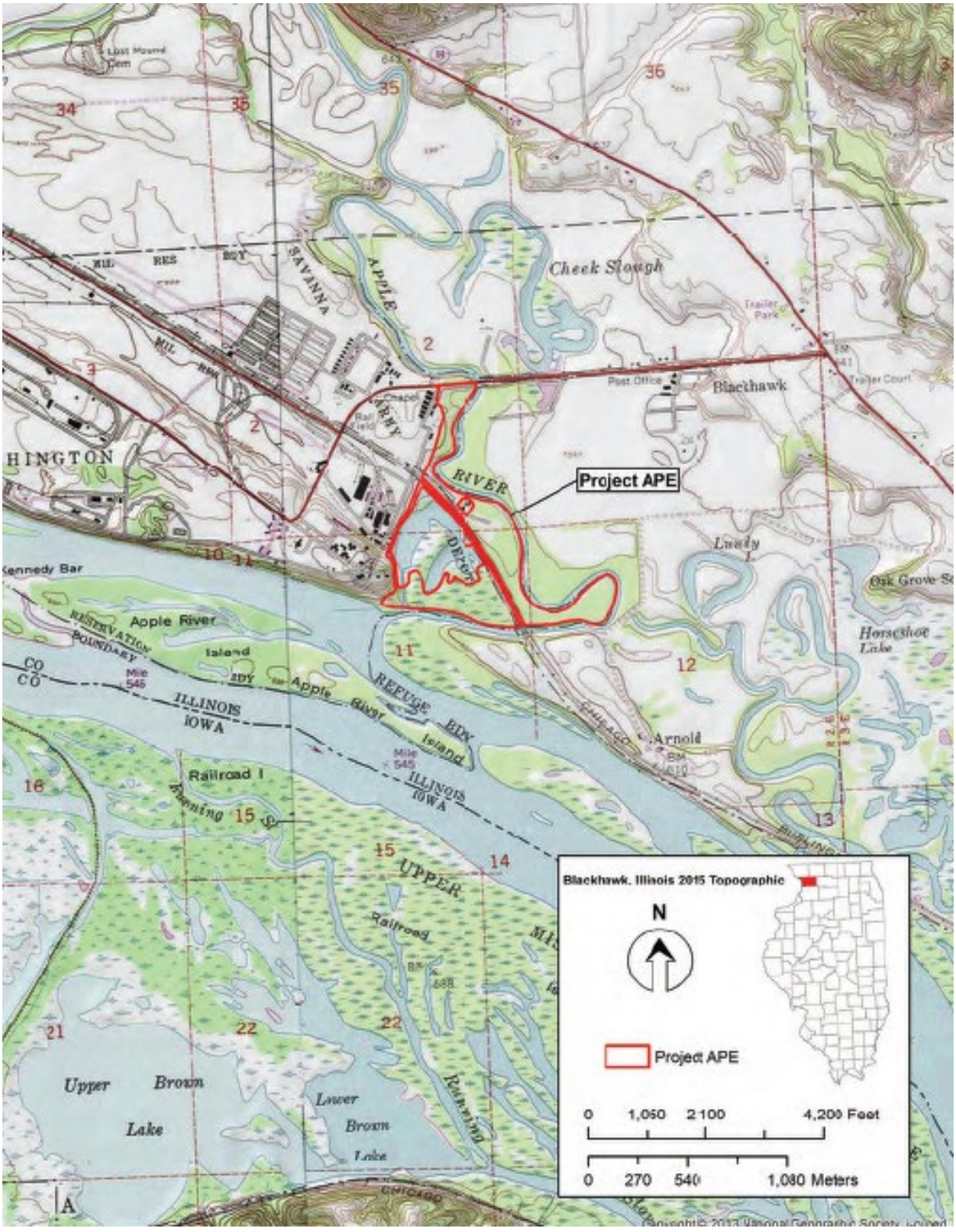
Enclosure 3: Site Map



LEGEND

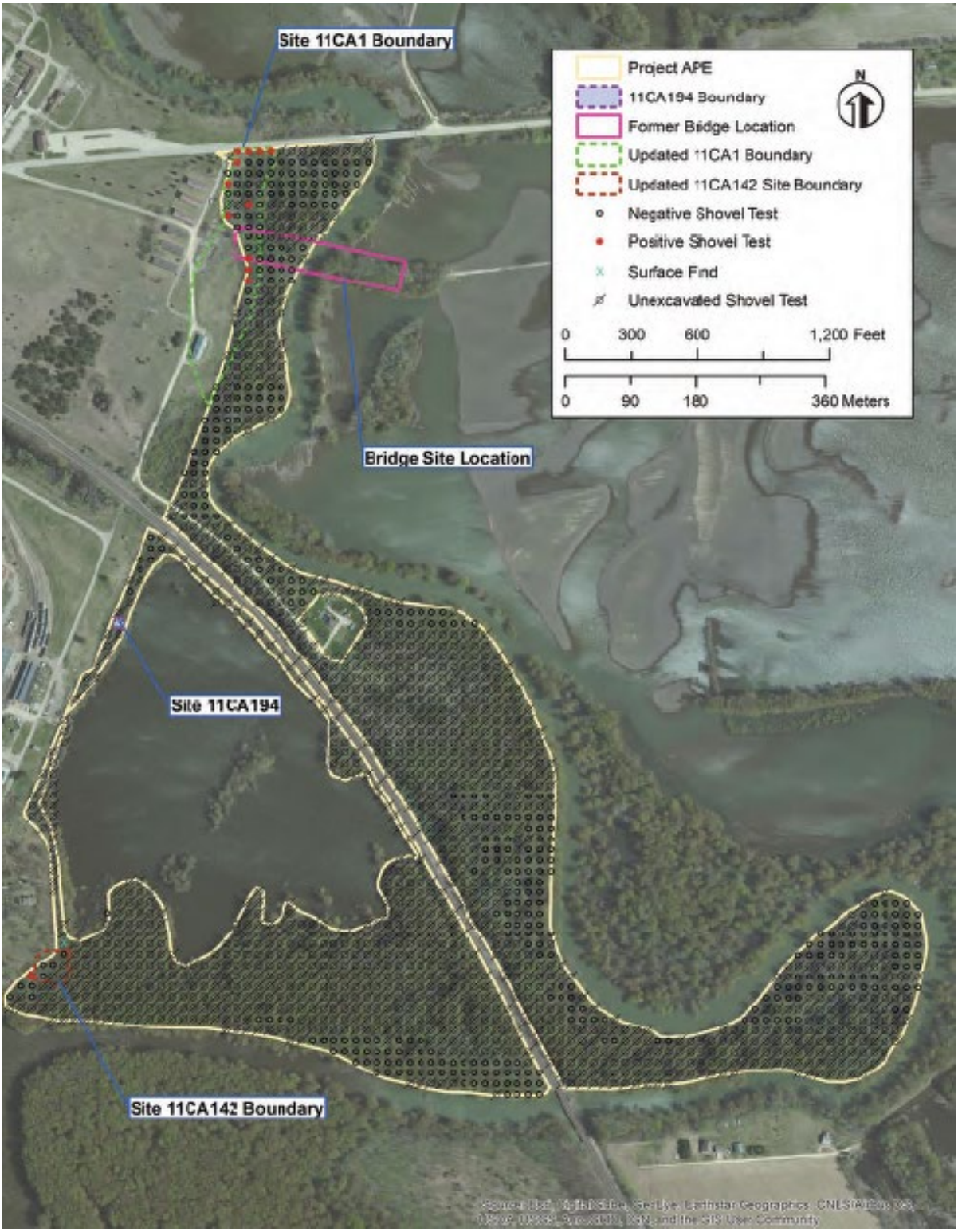
LRA Parcel 20 Boundary

Enclosure 4: Topographic Map



Source: Brockington and Associates, Inc. 2021. *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois*. Brockington and Associates, Inc., Atlanta, GA.

Enclosure 5: Archaeological Sites Map



Source: Brockington and Associates, Inc. 2021. *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois*. Brockington and Associates, Inc., Atlanta, GA.

Enclosure 6

ILLINOIS DEPARTMENT OF NATURAL RESOURCES

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

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

Enclosure 7: Preservation Covenant

PRESERVATION COVENANT
SVADA LRA Parcel 20

(held by Illinois Department of Natural Resources)

In consideration of the conveyance of certain real property, hereinafter referred to as the

SVADA LRA Parcel 20, located in Carroll County, Illinois, which is more fully describes as:

The Savanna Army Depot Activity (SVADA) local redevelopment authority (LRA) Parcel 20 at the southern end of SVADA in Carroll County, Illinois. The parcel is bounded by the Apple River to the east and south; the Mississippi River to the west; Vincent Road and Rofsteck Road to the northwest; and Crim Road to the north. The parcel is bisected from the northwest to the southeast by an active railroad line owned by the Burlington Northern Santa Fe Railway Company; the rail line is not part of the parcel to be transferred. A sewage treatment plant owned by the U.S. Army is surrounded by LRA Parcel 20, also is not part of the parcel to be transferred (Figure 1).

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.
3. Additional archaeological testing, NRHP site evaluations, and potential mitigation measures require additional Illinois SHPO consultation and Section 106 of the National Historic Preservation Act (NHPA) compliance measures, as required by law.
4. Execution of this Covenant shall include all applicable conditions, restrictions, laws, orders, and obligations set forth in the SVADA Programmatic Agreement (PA).
5. Conveyance of property that includes archaeological sites:
    a. In consideration of the conveyance of the real property, LRA Parcel 20, which includes the sites 11-CA-1 and 11-CA-142 located in Carroll County, Illinois. Jo-Carroll Depot LRA covenants on behalf of itself, its heirs, or successors, and assigns at all times to the Illinois SHPO to maintain and preserve sites 11-CA-1 and 11-CA-142, in accordance with the provisions of this Covenant.
    b. The property recipient will notify the Illinois SHPO in writing prior to any undertaking of any ground disturbance or action on sites that would affect the physical integrity of sites 11-CA-1 and 11-CA-142. Such a notice shall describe in reasonable detail the proposed undertaking and its expected effect on the physical integrity of sites 11-CA-1 and 11-CA-142.

c. Within thirty (30) calendar days of the Illinois SHPO's receipt of notification provided by the LRA, pursuant to this Covenant, the SHPO will respond to the LRA in writing as follows:
    i. That the LRA may proceed with the proposed undertaking without further consultation; or
    ii. That the LRA must initiate and complete additional consultation with the Illinois SHPO before it can proceed with the proposed undertaking; or
    iii. If the Illinois SHPO fails to respond to the LRA's written notice within thirty (30) calendar days of the SHPO's receipt of the same, then the LRA may proceed with the proposed undertaking without further consultation with the SHPO.
d. Lease and License:
    i. Archaeological sites 11-CA-1 and 11-CA-142 are potentially eligible for inclusion in the NRHP.
    ii. The Recipient/Lessee shall ensure that the sites remain undisturbed.
    iii. The Recipient/Lessee will notify the Owner of any proposed ground disturbance to the archaeological sites prior to undertaking said ground disturbance.
    iv. Notification will include a detailed description of the proposed undertaking.
    v. If the Army does not object to the proposal within thirty (30) calendar days of receipt of such notification and adequate supporting documentation, the Army will, with the assistance of the Lessee (Licensee), initiate consultation with Illinois SHPO in accordance with NHPA Section 106 and its implementing regulations, "Protection of Historic Properties" (Title 36of the Code of Federal Regulations Part 800).
    vi. The Recipient/Lessee will not undertake the proposed action until the Army notifies the Lessee (Licensee) that the requirements of Section 106 have been fulfilled and the Lessee (Licensee) may proceed.
    vii. If the Army objects to the Recipient's/Lessee's proposed ground disturbance, the Recipient/Lessee shall not undertake the proposed action.
e. The Illinois Department of Natural Resources shall be permitted at all reasonable times to inspect these archaeological sites to ascertain if the above conditions are being observed.
f. In the event of a violation of this Covenant, and in addition to any remedy now or hereafter provided by law, the Illinois Department of Natural Resources may, following reasonable notice to the Owner and Recipient/Lessee, institute suit to enjoin said violation or to require the restoration or mitigation of natural resources, archaeological sites, or structures disturbed by construction, alteration, or disturbance of the ground surface, or structure older than 50 years.
g. The Owner and Recipient/Lessee agrees that the Illinois Department of Natural Resources may at its discretion, without prior written notice to the Owner and Recipient/Lessee, convey and assign all or part of its rights and responsibilities contained herein to a third party.
h. This Covenant is binding on the Owner and Recipient/Lessee, and their successors and assignees in perpetuity. Restrictions, stipulations, and covenants contained herein shall be inserted by Owner and Recipient/Lessee verbatim or by express reference in any deed or other legal instrument by which it divests itself or either the fee simple title or any other lesser estate in this SVADA LRA Parcel 20 or any part thereof.
i. The failure of the Illinois Department of Natural Resources to exercise any right or remedy granted under this instrument shall not have the effect of waiving or limiting the exercise of any other right or remedy or the use of such right or remedy at any other time.

j. This Covenant shall be a binding servitude upon this SVADA LRA Parcel 20 and shall be deemed to run with the land. Execution of this Covenant shall constitute conclusive evidence that the United States Army and/ SVADA LRA agree to be bound by the foregoing conditions and restrictions and to perform the obligations herein set forth.

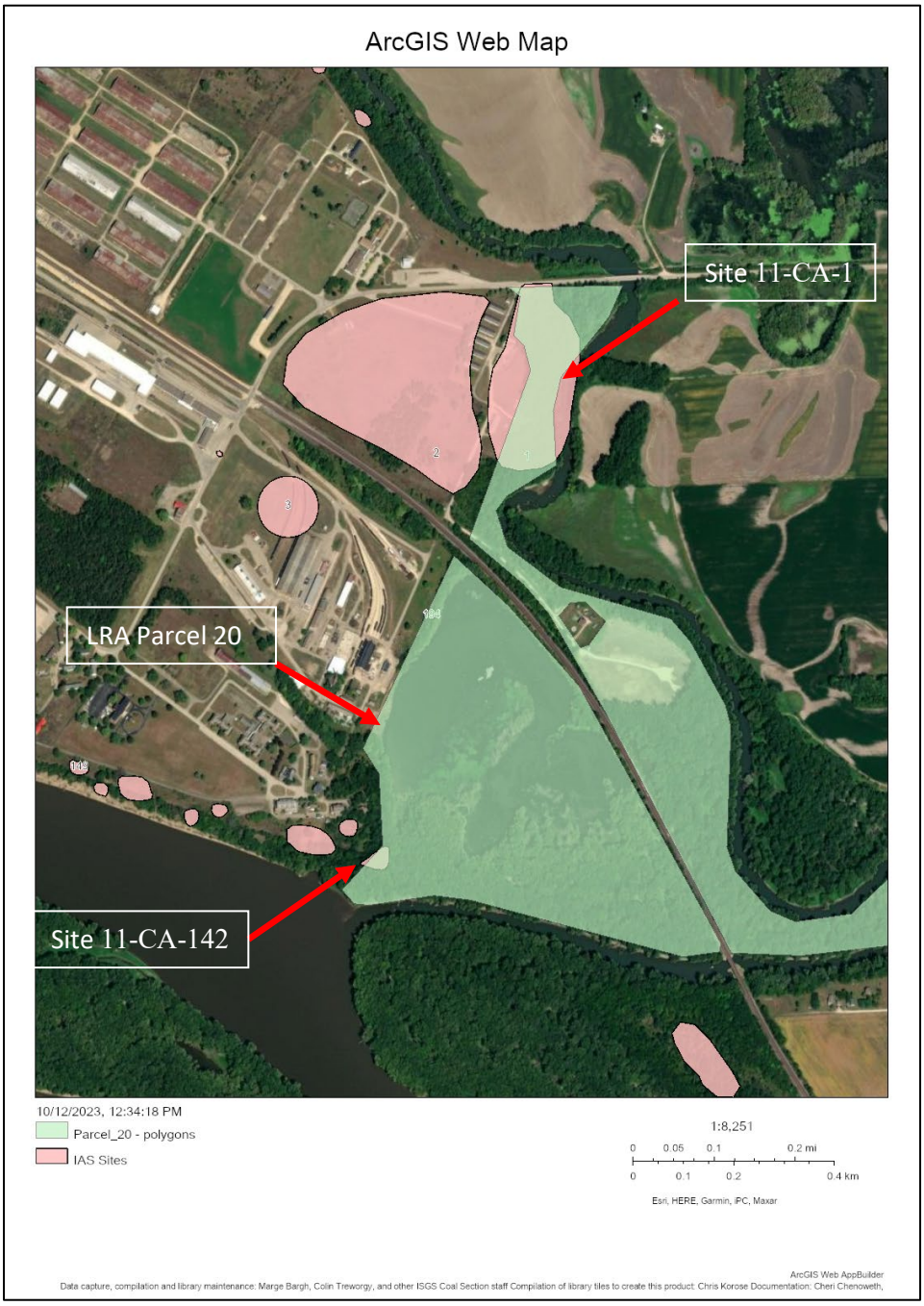


Figure 1. Aerial View of LRA Parcel 20, Showing Sites 11-CA-1 and 11-CA-142.

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

August 8, 2024

SUBJECT: 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

REFERENCE: SHPO Log #005022420

Ms. Carol (CJ) Wallace, Cultural Resources Coordinator
Illinois Department of Natural Resources
Attn: State Historic Preservation Office
1 Natural Resources Way
Springfield, IL 62702

Dear Ms. Wallace:

The U.S. Army (Army) is initiating early coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject Supplemental Environmental Impact Statement (SEIS). The Army will prepare the SEIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the SEIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) and (2) the potential effects of the LRA's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 environmental impact statement (EIS) evaluated the closure, and the Depot was officially closed in 2000. The subject SEIS will be supplemental to the 1997 EIS. In 2000, the *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* (2000 SVADA PA) (Enclosure 2, Programmatic Agreement) was executed in support of the 1997 EIS to ensure adequate consideration of the effect of the closure and disposal on historic properties.

The Army originally initiated consultation with your office for this project as an environmental assessment (EA) in early 2020. We thank you for your February 26, 2020, response. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in November 2023. Based on information received during the EA scoping process, the Army determined preparation of a SEIS would be appropriate. The Army will issue a Notice of Intent to prepare the SEIS later this year and will notify you of the beginning of the scoping process and of the public scoping meeting date and location.

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At this time, the Army is initiating early coordination with you for the SEIS to request (1) your input on the Army holding an agency meeting separate from the public scoping meeting and (2) any comments you might have in addition to those you provided in your letter of February 26, 2020. The project remains unchanged from the description of it presented for the 2023 scoping. The remainder of this letter provides information on the project location, the proposed action, and alternatives.

The 132-acre parcel is undeveloped land in Carroll County, IL (Enclosure 3, Site Map and Enclosure 4, Topographic Map). The parcel includes Commander's Pond (formerly known as Ordnance School Lake). The parcel is bordered on the east and south by the Apple River, a tributary of the Mississippi River; the Mississippi River on the southwest; Vincent Road and Rofsteck Road on the west; and Crim Road on the north. While these rivers and roads form the boundaries of the parcel, they are not part of it. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by the 132-acre parcel, also is not part of the parcel to be transferred.

Since 2000, through the BRAC process, as former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, the Army has transferred them to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the LRA. The Army already has transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west/northwest.

In 2016, USFWS withdrew interest in the 132-acre parcel of land (formerly known as Parcel FWS 5) at the southeastern end of SVADA. The Army officially identified the parcel as surplus in January 2018. The Army's proposed action is disposal of the parcel, which has been redesignated LRA Parcel 20, and transferring the property to the LRA. The Army has completed the following remediation at four contaminated cleanup sites on LRA Parcel 20:

- Site 20, Abandoned Landfill: Capped the landfill with "hot spot" removal (i.e., excavating soil containing chemicals of concern at concentrations above recreational remediation goals and buried drums and debris); transported the contaminated soil, drums, and debris to a regulated, licensed solid waste landfill for disposal; conducted site restoration; is conducting long-term monitoring of groundwater and surface water; is maintaining the engineered landfill cap; implemented land use controls that restrict site access, prohibit residential agricultural land use, and prevent intrusive activities; and will conduct further PFAS investigations.
- Site 73, Stables Landfill: Conducted surface debris removal, soil excavation, and off-site disposal.
- Site 130, Vincent Road Septic System: Conducted soil and groundwater sampling. The human health risks were determined to be acceptable for receptors and specified land uses and the preferred remedy was No Further Action.
- Site 178, Shop Area (Buildings 100–129) Sanitary and Stormwater Sewer Lines and Outfalls to Ordnance School Lake: Conducted soil and sediment excavation, off-site disposal, and implemented

LUCs to prevent the site from being used for purposes other than industrial/commercial and recreational.

The LRA's finalized 2023 reuse plan for the parcel is available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-1689879402.pdf, and the appendices to the plan are available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-appendices-1689879402.pdf. The LRA presents three conceptual reuse alternatives for developing LRA Parcel 20 in its plan, which focus on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development under each alternative. 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 includes activities outside the boundary of LRA Parcel 20 in the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island. All of the LRA's reuse alternatives would require dredging.

The 2000 SVADA PA is still in effect. A complete Phase I archaeological survey of LRA Parcel 20 was conducted by Brockington Associates (Brockington) in 2020. LRA Parcel 20 has no known buildings, structures, or traditional cultural properties currently listed in the National Register of Historic Places (NRHP). Two archaeological sites within LRA Parcel 20 (sites 11-CA-1 and 11-CA-142) are identified as potentially eligible for listing in the NRHP, and a third site (Site 11-CA-194) is not eligible (Enclosure 5, Archaeological Sites Map). Brockington provided the survey report to your office on November 4, 2020. Your office responded in a letter dated December 24, 2020, that the project as proposed would have no adverse effect on the two potentially eligible sites and that Site 11-CA-194 is not eligible for listing in the NRHP, but that any plan modifications must include State Historic Preservation Officer (SHPO) notification (Enclosure 6, SHPO letter dated December 24, 2020). Brockington finalized the *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois* in January 2021.

If any sites are determined to be NRHP eligible through additional archaeological testing within LRA Parcel 20, cultural resources encumbrances in the form of a preservation covenant will apply in perpetuity, as appropriate, based on the 2000 SVADA PA and in consultation with your office under NHPA Section 106 (Enclosure 7, Preservation Covenant).

If you have input regarding an agency scoping meeting, resources of concern to your agency, or any questions concerning this BRAC action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2024.08.08 08:35:35 -04'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Savanna Army Depot Activity, Base Environmental Coordinator
Mr. Christopher Koeppel, Advisory Council on Historic Preservation, Assistant Director, Office of Federal Agency Programs, Federal Property Management Section

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

September 27, 2024

SUBJECT: Early Coordination 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

Mr. John Greendeer, President
Ho-Chunk Nation of Wisconsin
PO Box 667
Black River Falls, WI 54615

Dear President Greendeer:

The U.S. Army (Army) is initiating early coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject Environmental Impact Statement (EIS). The Army will prepare the EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500– 1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132- acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois through transfer to the Jo- Carroll Depot Local Redevelopment Authority (LRA) and (2) the potential effects of the LRA's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 environmental impact statement (EIS) evaluated the closure, and the Depot was officially closed in 2000. The subject EIS will tier from the 1997 EIS. In 2000, the *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* (2000 SVADA PA) (Enclosure 2, Programmatic Agreement) was executed in support of the 1997 EIS to ensure adequate consideration of the effect of the closure and disposal on historic properties.

The Army originally initiated consultation with your Tribe for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in November 2023. Based on information received during the EA scoping process, the Army determined preparation of an EIS would be appropriate. The Army will issue a Notice of Intent to prepare the EIS later this year and will notify you of the beginning of the scoping process and of the public scoping meeting date and location.

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At this time, the Army is initiating early coordination with you for the EIS to request (1) your input on the Army holding a Tribe and agency meeting separate from the public scoping meeting and (2) any comments you might have on proposed action alternatives and effects, as well as relevant information, studies, or analysis with respect to the proposed action. The remainder of this letter provides information on the project location, the proposed action, and alternatives.

The 132-acre parcel is undeveloped land in Carroll County, IL (Enclosure 3, Site Map and Enclosure 4, Topographic Map; *Note*: General Land Office historical maps were not available from the Bureau of Land Management website.) The parcel includes Commander's Pond (formerly known as Ordnance School Lake). The parcel is bordered on the east and south by the Apple River, a tributary of the Mississippi River; the Mississippi River on the southwest; Vincent Road and Rofsteck Road on the west; and Crim Road on the north. While these rivers and roads form the boundaries of the parcel, they are not part of it. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by the 132-acre parcel, also is not part of the parcel to be transferred.

Since 2000, through the BRAC process, as former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, the Army has transferred them to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the LRA. The Army already has transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west/northwest.

In 2016, USFWS withdrew interest in the 132-acre parcel of land (formerly known as Parcel FWS 5) at the southeastern end of SVADA. The Army officially identified the parcel as surplus in January 2018. The Army's proposed action is disposal of the parcel, which has been redesignated LRA Parcel 20, through transfer of the property to the LRA. The Army has completed the following remediation at four contaminated cleanup sites on LRA Parcel 20:

- Site 20, Abandoned Landfill: Capped the landfill with "hot spot" removal (i.e., excavating soil containing chemicals of concern at concentrations above recreational remediation goals and buried drums and debris); transported the contaminated soil, drums, and debris to a regulated, licensed solid waste landfill for disposal; conducted site restoration; is conducting long-term monitoring of groundwater and surface water; is maintaining the engineered landfill cap; implemented land use controls that restrict site access, prohibit residential agricultural land use, and prevent intrusive activities; and will conduct further PFAS investigations.
- Site 73, Stables Landfill: Conducted surface debris removal, soil excavation, and off-site disposal.
- Site 130, Vincent Road Septic System: Conducted soil and groundwater sampling. The human health risks were determined to be acceptable for receptors and specified land uses and the preferred remedy was No Further Action.
- Site 178, Shop Area (Buildings 100–129) Sanitary and Stormwater Sewer Lines and Outfalls to Ordnance School Lake: Conducted soil and sediment excavation, off-site disposal, and implemented LUCs to prevent the site from being used for purposes other than industrial/commercial and recreational.

The EIS will analyze the proposed action of disposal and transfer of Parcel 20, a no action alternative, LRA reuse alternatives, and an alternative under which LRA Parcel 20 would be available for recreational (e.g., walking trail, canoe launch, recreational field) and/or solar use but otherwise remain undeveloped. The LRA's finalized 2023 reuse plan for the parcel is available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-1689879402.pdf, and the appendices to the plan are available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-appendices-1689879402.pdf. The LRA presents three conceptual reuse alternatives for developing LRA Parcel 20 in its plan (Enclosures 5, 6, and 7), which focus on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development under each alternative. To facilitate implementation, the LRA designed the alternatives as sequential phases. The LRA's first reuse alternative, Brickhouse Slough, could be implemented within a target 5-year completion window, while their second reuse alternative, Commander's Pond Lite, and third, Commander's Pond Full, could follow, with both having 5-year-plus completion windows. The LRA's proposed reuse includes activities outside the boundary of LRA Parcel 20 in the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island. All of the LRA's reuse alternatives would require dredging.

The 2000 SVADA PA is still in effect. A complete Phase I archaeological survey of LRA Parcel 20 was conducted by Brockington Associates (Brockington) in 2020. LRA Parcel 20 has no known buildings, structures, or traditional cultural properties currently listed in the National Register of Historic Places (NRHP). Two archaeological sites within LRA Parcel 20 (sites 11-CA-1 and 11-CA-142) are identified as potentially eligible for listing in the NRHP, and a third site (Site 11-CA-194) is not eligible (Enclosure 8, Archaeological Sites Map). Brockington provided the survey report to the Illinois State Historic Preservation Office (SHPO) on November 4, 2020. The Illinois SHPO responded in a letter dated December 24, 2020, that the project as proposed would have no adverse effect on the two potentially eligible sites and that Site 11-CA-194 is not eligible for listing in the NRHP, but that any plan modifications must include Illinois SHPO notification (Enclosure 9, SHPO letter dated December 24, 2020). Brockington finalized the *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois* in January 2021.

If any sites are determined to be NRHP eligible through additional archaeological testing within LRA Parcel 20, cultural resources encumbrances in the form of a preservation covenant will apply in perpetuity, as appropriate, based on the 2000 SVADA PA and in consultation with the Illinois SHPO under NHPA Section 106 (Enclosure 10, Preservation Covenant).

A portion of the east shoreline of Brickhouse Slough outside Parcel 20 at about River Miles 545-544, is a designated Environmentally Sensitive Area (Site 13-E-4) by the USACE due to its archaeological significance (Enclosure 11). This site is identified by the Illinois SHPO as Site 11CA60**.** The site is bounded by a sandy bank that is susceptible to erosion from traffic along the river. Previous mitigation efforts were performed by the USACE to support the bank using riprap; however, these efforts may not prevent the site from being exposed to further degradation. No information on the cultural resources at the site are available, and the site's eligibility is undetermined.

If you have input regarding attending a Tribe and agency scoping meeting, resources of concern to your Tribe, or any questions concerning this BRAC action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter.

Sincerely,

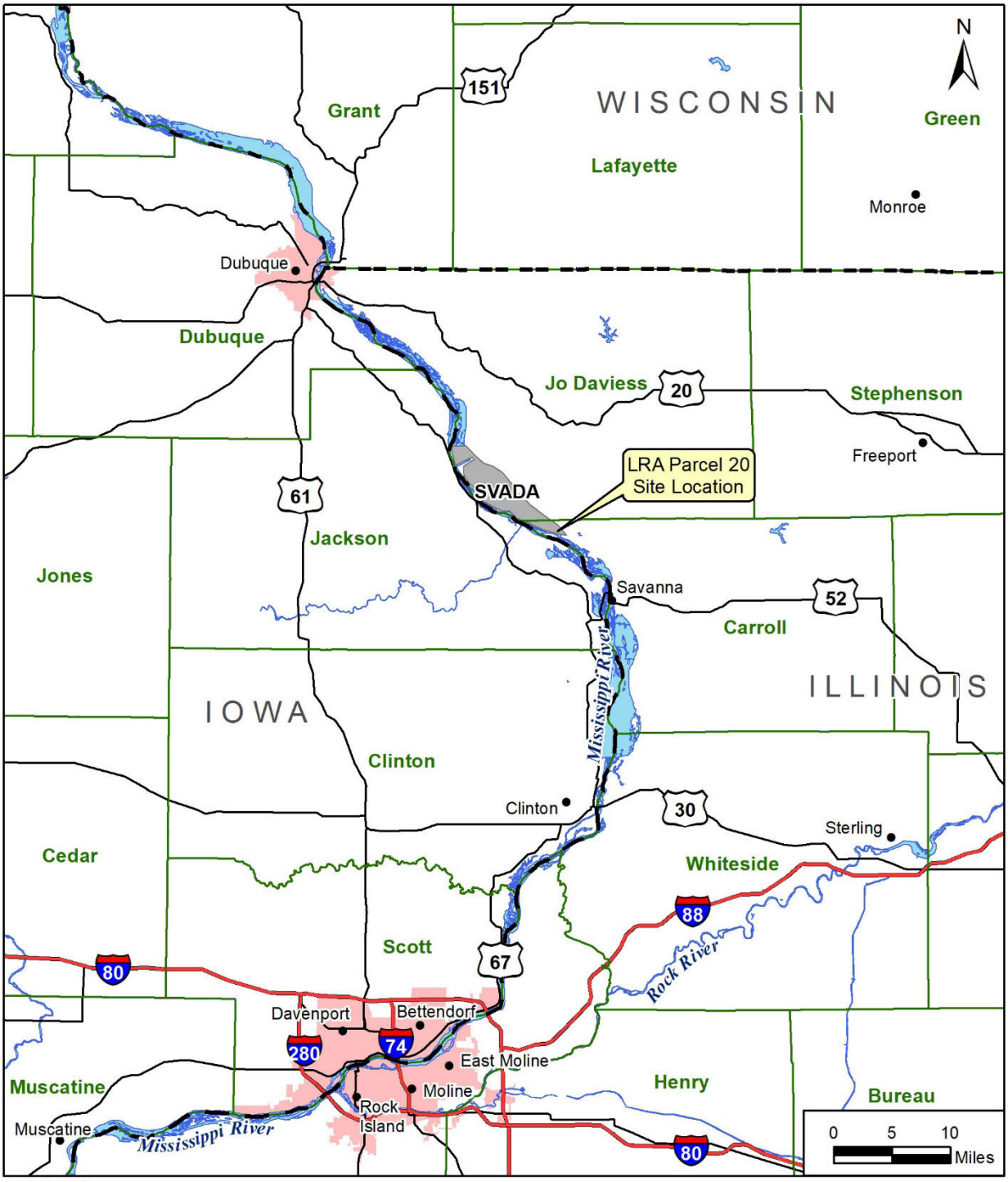
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Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Savanna Army Depot Activity, Base Environmental Coordinator
Mr. Kent Collier, NAGPRA, Kickapoo Tribe of Oklahoma
Ms. Susan Tiger, NAGPRA Representative, Kickapoo Tribe of Oklahoma
Mr. Darwin Kaskaske, Chairman, Kickapoo Tribe of Oklahoma
Mr. William Quackenbush, THPO, Ho-Chunk Nation of Wisconsin
Mr. John Greendeer, President, Ho-Chunk Nation of Wisconsin
Ms. Melissa Wiatrolik, THPO, Little Traverse Bay Bands of Odawa Indians
Ms. Regina Gasco-Bentley, Chairperson, Little Traverse Bay Bands of Odawa Indians
Mr. David Grignon, THPO, Menominee Indian Tribe of Wisconsin
Ms. Gena Kakkak, Chairwoman, Menominee Indian Tribe of Wisconsin
Mr. Logan York, THPO, Miami Tribe of Oklahoma
Mr. Douglas Lankford, Chief, Miami Tribe of Oklahoma
Dr. Andrea Hunter, Director and THPO, Historic Preservation Office, The Osage Nation
Mr. Geoffrey Standing Bear, Principal Chief, The Osage Nation
Ms. Tiauna Carnes, Chairperson, Sac & Fox Nation of Missouri in Kansas and Nebraska
Ms. Sandra Massey, THPO, Sac & Fox Nation, Oklahoma
Mr. Randle Carter, Principal Chief, Sac & Fox Nation, Oklahoma
Mr. Vern Jefferson, Chairman, Sac & Fox Tribe of the Mississippi in Iowa
Mr. Johnathon Buffalo, THPO, Sac & Fox Tribe of the Mississippi in Iowa
Ms. Sunshine Thomas-Bear, THPO, Winnebago Tribe of Nebraska
Ms. Victoria Kitcheyan, Chairwoman, Winnebago Tribe of Nebraska

Enclosure 1: Location Map



LEGEND

- State Boundary
- County Boundary
- Interstate Highway
- U.S. Route
- Urban Area
- Surface Water

Enclosure 2: Programmatic Agreement

DEPARTMENT OF DEFENSE
BASE TRANSITION FIELD OFFICE
Savanna Army Depot Activity
Savanna, Illinois 61074-9636

REPLY TO
ATTENTION OF

Base Transition Coordinator

25 Sep 2000

Mr. Tom McCulloch
Advisory Council on Historic Preservation
The Old Post Office Building
1100 Pennsylvania Avenue, NW, #809
Washington, DC 20004

Dear Mr. McCulloch:

Please find enclosed for Advisory Council signature, the cultural resource programmatic agreement (PA) for the closure and disposal of lands and buildings at Savanna Army Depot Activity (SVDA), Illinois. This PA, which you have previously reviewed, details how the Army will take into account, under Section 106 of the National Historic Preservation Act (NHPA), the effects of this disposal action on SVDA historic properties. All changes to the PA requested by your office and the Illinois SHPO have been made.

After your office has signed the PA, please forward a copy of the fully executed PA to Mr. James Davidson at the following address:

Commander, U.S. Army Material Command
ATTN: AMCQMA (James Davidson)
5001 Eisenhower Ave.
Alexandria, VA 22333-0001

Should you have any questions about the PA, the Army Material Command point of contact is Mr. James Davidson, at 703-617-5510. Technical questions concerning the PA should be directed to Dr. Neil Robison at 334-690-3018.

Thank you for your assistance in completing the NHPA Section 106 process for the Savanna Army Depot Activity. It has been a pleasure to work with you on this project.

Sincerely,

ARLEN J. DAHLMAN
Base Transition Coordinator

DEPARTMENT OF THE ARMY
HEADQUARTERS, U.S. ARMY MATERIEL COMMAND
5001 EISENHOWER AVENUE, ALEXANDRIA, VA 22333 - 0001

REPLY TO
ATTENTION OF
AMCQMA

August 28, 2000

Ms. Anne Haaker
Deputy State Historic Preservation Officer
Illinois Historic Preservation Agency
1 Old State Capitol Plaza
Springfield, IL 62701-1512

Dear Ms. Haaker:

Please find enclosed for your signature, the cultural resource programmatic agreement (PA) for the closure and disposal of lands and buildings at Savanna Army Depot Activity (SEDA), Illinois. This PA, which your office has previously reviewed, details how the Army will take into account, under Section 106 of the National Historic Preservation Act (NHPA), the effects of this disposal action on SEDA historic properties. All changes to the PA requested by your office and the Advisory Council have been made.

After you have signed the PA, please forward the document to Mr. Arlen J. Dahlman, the Base Transition Coordinator for the SEDA BRAC action. Mr. Dahlman will have Mr. John A. Moorehead, the executive director of the Jo Carroll Depot Local Redevelopment Authority sign the PA and will then forward the document to the Advisory Council for their signature. Mr. Dahlman's address is as follows:

Mr. Arlen J. Dahlman
Base Transition Coordinator
2750 Kinney Loop
Savanna, IL 61074

Should you have any questions about the PA, the Army Material Command point of contact is Mr. Jim Davidson, at 703-617-5510. Technical questions concerning the PA should be directed to Dr. Neil Robison at 334-690-3018.

Thank you for your assistance in completing the NHPA Section 106 process for the Savanna Army Depot Activity.

Sincerely,

DARYL H. POWELL

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

August 2000

Whereas the United States Army (Army) is responsible for implementation of applicable provisions of the Defense Base Closure and Realignment Act of 1990 (P.L. 101-510) as amended, and is proceeding with the closure of Savanna Army Depot Activity (SVDA), and consequent disposal of excess and surplus property in a manner consistent with the requirements of the applicable Defense Base Closure and Realignment Commission recommendation; and

Whereas the Army has determined that leasing, licensing and/or disposal of all or portions of SVDA, in Illinois, may have an effect upon historic properties that have been designated as eligible for listing in, the National Register of Historic Places, and has consulted with the Illinois State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation (Council) pursuant to 36 C.F.R. Part 800, regulations implementing Section 106 of the National Historic Preservation Act (16 U.S.C. Section 470(f), Section 110(f) of the same Act (16 U.S.C. Section 470h-2[f]), and Section 111 of the same Act (16 U.S.C. Section 470h-3); and

Whereas after real estate screening activities were conducted it was determined that SVDA surplus lands will be divided between the U.S. Fish and Wildlife Service, the U.S. Army Corps of Engineers, the Illinois Department of Natural Resources, and the Jo Carroll Depot Local Reuse Authority; and

Whereas the Army will conduct cultural resource inventory activities only for those lands to be transferred to non-federal entities; and

Whereas the Army has completed a number of historic architectural and archeological surveys (listed in Attachment A) to support

disposal of portions of the BRAC property to non-federal entities; and

Whereas none of the SVDA buildings to be conveyed to non-federal entities, examined by the 1997 architectural inventory study, were determined to be eligible for the National Register of Historic Places; and

Whereas a number of archeological sites located within those SVDA BRAC excess lands scheduled for disposal to non-federal entities have been determined to be eligible or potentially eligible for the National Register of Historic Places (listed in Attachment B); and

Whereas not all BRAC lands to be disposed of to non-federal entities can be surveyed for archeological resources until the lands have been examined for and, if necessary, cleared of unexploded ordnance (UXO); and

Whereas interested members of the public, including the Jo Carroll Depot Local Redevelopment Authority, and Native Americans, have been provided opportunities to comment on the effects this base closure may have on historic properties at SVDA through public hearings, consultation meetings, and other means; and

Whereas in carrying out the disposal of excess and surplus property the Army will comply with all applicable laws and regulations, including 36 C.F.R. Part 79, Curation of Federally-Owned and Administered Archeological Collections;

Whereas the Jo Carroll Depot Local Redevelopment Authority has been invited to concur in this agreement document; and

NOW, THEREFORE, the Army, the SHPO, and the Council agree that the undertaking described above shall be implemented in accordance with the following stipulations to take into account the effect of the undertaking on historic properties.

STIPULATIONS - The Army will ensure that the following measures are carried out:

I. Identification and Evaluation

A. The Army will conduct Phase I archeological site location surveys for those SVDA lands that are to be transferred to non-federal entities and that have not been previously surveyed for archeological resources (Appendix C map

displays those SVDA lands that will be surveyed for archeological resources).

B. For lands that must be examined for potential UXO contamination, archeological surveys will be conducted only after the area has been examined for UXO and has been determined as being safe for subsurface archeological testing. Due to explosive ordnance qualification requirements and safety factors, no archeologists will be made part of the actual UXO field survey and disposal teams. However, archeologists associated with the UXO contractor and the U.S. Army Corps of Engineers (USACE) will be available for consultations and to examine any archeological finds that may be made in the course of the UXO investigations. The following procedures will be followed by the UXO disposal teams that will conduct the UXO surveys.

1. Prior to the initiation of field investigations at SVDA, UXO survey personnel will receive a cultural resources orientation concerning known cultural resource sites within the project area and recognition of cultural resource artifactual materials that could be encountered by the UXO investigations.

2. UXO surveys will involve location of metallic objects by metal detectors and hand excavation of these metallic objects by UXO disposal experts. Non UXO related metallic objects and any other cultural items encountered by the investigators will be left on the ground surface adjacent to the hole from which they were removed for later examination and, if appropriate, collection during subsequent archeological surveys.

3. UXO field survey personnel will notify the SVDA BRAC Environmental Coordinator (BEC) and the contract or USACE archeologist of any cultural materials or human skeletal materials encountered during the UXO investigations. If human skeletal remains are encountered, UXO investigations will be immediately halted for that sampling grid and the SVDA BEC and USACE archeologist will make arrangements to determine the origin of the human remains and whether the requirements of the Native American Graves Protection and Repatriation Act (NAGPRA) should be enacted.

4. UXO related items encountered by the UXO disposal experts may be removed from the location where they are encountered for disposal or may be exploded *in situ*, if removal is considered to be too hazardous.

C. The Army will coordinate the findings and recommendations for all SVDA archeological surveys with the Illinois SHPO as the survey reports are completed.

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.

III. Licenses and Leases

Licenses or leases, to other than federal agencies, of historic properties will include language provided in Attachment D of this agreement as appropriate.

IV. Disposal of SVDA Properties

A. Transfer of Real Property That Does Not Contain Historic Properties

In leasing or disposing of real property and improvements--for which identification and evaluation have been completed in consultation with the SHPO--that do not contain historic properties, any portion of an historic property, archeological sites, or any portion of an archeological site, no further action is necessary under this agreement. The Army will, however, promptly notify the SHPO that such a transfer has been completed.

B. Assignments to Other Federal Agencies

In assigning historic property (ies) directly to another Federal agency by a transfer authority such as The Federal Property and Administrative Services Act of 1949, as amended (40 U.S.C. § 471 et seq.), the receiving Federal agency will be deemed responsible for compliance with 36 C.F.R. Part 800 and any other applicable state or Federal laws and regulations with respect to the maintenance and disposal of these properties. The Army will promptly notify the SHPO and Council in writing of each Federal agency that has requested and been assigned such property.

C. Public Benefit Conveyances to Non-Federal Recipients

In disposing of historic property(ies) directly to a non-Federal recipient - at the request of a sponsoring Federal agency, and pursuant to the Public Benefit Conveyance authorities contained in the Federal Property and Administrative Services Act of 1949, as amended (40 U.S.C. § 471 et seq.), and other applicable authorities - an appropriate preservation covenant (found at Attachment E) will be incorporated in the transfer instrument(s). The Army will promptly notify the SHPO and Council in writing of each such transfer of an archeological-site property.

D. Economic Development Conveyances to LRAs

In disposing of historic property(ies) to a Local Redevelopment Authority (LRA) pursuant to the Economic Development Conveyance authority contained in the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510, as amended), an appropriate preservation covenant (found at Attachment E) will be incorporated in the transfer instrument(s). The Army will promptly notify the SHPO and Council in writing of each such transfer of an archeological-site property.

E. Competitive Sales

In disposing of historic properties via a competitive sale transfer authority, the Army's bid solicitation will contain the following information:

(1) Information on the property's archeological significance, identifying elements, or other characteristics of the property that should be given special consideration in planning;

(2) Information on financial incentives for preservation of archeological properties;

(3) Information indicating that an appropriate preservation covenant will be incorporated in the instrument transferring title to the property, and that this covenant will be substantively identical to the one contained in Attachment E of this agreement (as appropriate), unless modifications are authorized pursuant to the process described in paragraph IV. G, below, and as required to accord the covenants with state law.

In developing the above information for inclusion in its initial bid solicitation document, the Army will solicit the advice and

assistance of the SHPO. The Army need not solicit such advice and assistance in preparing subsequent solicitation documents, unless such documents contain historic properties information that materially differs from that included in the initial solicitation document. The Army will notify the SHPO and Council in writing of each such transfer of an archeological-site property.

F. Negotiated Sales

In disposing of historic properties via a negotiated sale transfer authority, the Army will provide a written document ("negotiation document") to the negotiating party that sets forth the same information described in subparagraphs IV. E (1), (2) & (3), above. In developing this information for inclusion in the negotiation document to be provided to the initial negotiating party, the Army will solicit the advice and assistance of the SHPO. The Army need not solicit such advice and assistance in preparing negotiation documents for subsequent negotiating parties, unless such documents contain historic properties information that materially differs from that included in the document provided to the initial negotiating party. The Army will notify the SHPO and Council in writing of each such transfer of an archeological-site property.

G. Covenant Modification to Facilitate Transfer

If the Army cannot transfer the property or properties that contain National Register eligible archeological sites pursuant to the provisions set forth in paragraphs IV. C, D, E, and F above, then the Army will consult with the SHPO, the Council, and (with respect to transfers pursuant to paragraphs IV. C, D, and F) the prospective transferee(s) to determine appropriate modifications to the preservation covenant contained in Attachment E that are necessary in order to complete transfer of the property(ies) within established disposal timelines. Such modifications shall be limited to those that are reasonably necessary in order to effect transfer of, or effectively market, the concerned property within established timelines.

V. Environmental Remediation

A. UXO identification and removal will be handled as described in Stipulation I.B of this agreement document. As they are developed, the plans for other proposed environmental remediation activities will be reviewed by the SVDA BRAC Environmental Coordinator (BEC) to identify any effects to historic properties, known or yet to be discovered. If the Army determines that a proposed remediation activity will take place

less than 100 feet from a historic property and has the potential to affect that property, the Army will consult with the SHPO to determine what steps, if any, should be taken with respect to those effects.

B. Proposed remediation plans that the Army determines may affect historic properties will be submitted to the SHPO for review and comment in accordance with the following procedures:

(1) Proposed remediation plans or supplemental documentation furnished by the Army will provide descriptions of any potential conflicts between remediation and preservation of historic properties;

(2) In situations where the Army determines that there is an immediate threat to human health, safety, or the environment, and that remediation must proceed without first taking steps to preserve historic properties, then the Army's reasons for so determining will be fully described;

(3) In situations where the Army determines that there is not an immediate threat to human health, safety, or the environment, and that implementation of its proposed remediation plan will result in the destruction or substantial alteration of any historic property, then the Army shall either modify its remediation plan to avoid the adverse effect or implement data recovery and/or recordation in consultation with the SHPO, taking into account health and safety constraints inherent in properties containing hazardous materials, resource availability, and any other relevant constraints.

VI. Anti-Deficiency Act

The stipulations of this agreement are subject to the provisions of the Anti-Deficiency Act. If compliance with the Anti-Deficiency Act alters or impairs the Army's ability to implement the stipulations of this agreement, the Army will consult in accordance with the amendment and termination procedures found at Sections IX. and X. of this agreement.

VII. Status Reports

Until such time as all SVDA archeological properties have been transferred from Army control in accordance with the terms of this agreement, the Army will provide an annual status report

to the Council and Illinois SHPO to review implementation of the terms of this agreement and to determine whether amendments are needed. If amendments are needed, the signatories to this agreement will consult, in accordance with Stipulation IX. of this agreement, to make such revisions.

VIII. Dispute Resolution

A. Should the Illinois SHPO and/or the Council object within thirty (30) days to any plans or other documents provided by the Army or others for review pursuant to this agreement, or to any actions proposed or initiated by the Army pursuant to this agreement, the Army shall consult with the objecting party to resolve the objection. If the Army determines that the objection cannot be resolved, the Army shall forward all documentation relevant to the dispute to the Council. Within thirty (30) days after receipt of all pertinent documentation, the Council will either:

(1) Provide the Army with recommendations, which the Army will take into account in reaching a final decision regarding the dispute; or

(2) Notify the Army that it will comment pursuant to 36 C.F.R. 800.7(c), and proceed to comment.

Any Council comment will be taken into account by the Army in accordance with 36 C.F.R. 800.7(c)(4) with reference to the subject of the dispute.

B. Any recommendations or comment provided by the Council pursuant to Stipulation VIII. A above will pertain only to the subject of the dispute; the Army's responsibility to carry out all other actions under this agreement that are not the subjects of the dispute will remain unchanged.

C. At any time during implementation of the measures stipulated in this agreement by the Army, if an objection to any such measure or its manner of implementation is raised by interested persons, then the Army shall consider the objection and consult, as appropriate, with the objecting party, the SHPO, and the Council to attempt to resolve the objection.

IX. Amendments

A. The Army, Illnois SHPO, and/or Council may request that this PA be revised, whereby the parties will consult to consider whether such revision is necessary.

B. If it is determined that revisions to this PA are necessary, then the Army, the Council, and the SHPO shall consult pursuant to 36 C.F.R. 800.6(c)(7), as appropriate, to make such revisions. Except that, reviewing parties must comment on, or signify their acceptance of, the proposed changes to the PA in writing within 30 days of their receipt.

X. Termination of Agreement

A. The Army, Illnois SHPO, and/or Council may terminate this PA by providing thirty (30) days written notice to the other signatory parties. During the period after notification and prior to termination the Army, the Council, and the SHPO will consult to seek agreement on amendments or other actions that would avoid termination. In the event of termination, the Army will comply with 36 CFR Part 800.6(c)(8) with regard to individual undertakings associated with the BRAC disposal action.

Execution and implementation of this PA evidences that the Army has afforded the Council a reasonable opportunity to comment on the closure and disposal of excess and surplus property at SVDA, and that the Army has taken into account the effects of the undertaking on historic properties. Execution and compliance with this programmatic agreement fulfills the Army's Section 106 responsibilities regarding the closure and disposal of Savanna Army Depot Activity.

DEPARTMENT OF THE ARMY

By: Charles S. Mahan Jr. Date: 21 August 2000
Charles S. Mahan, Jr.
Major General, USA
Chief of Staff

ILLINOIS STATE HISTORIC PRESERVATION OFFICER

By: _____ Date: 9-20-00
Anne Haaker
Deputy State Historic Preservation Officer

ADVISORY COUNCIL ON HISTORIC PRESERVATION

By: John M. Fowler Date: 10/13/00
John Fowler
Executive Director

Concur:

JO CARROLL DEPOT LOCAL REDEVELOPMENT AUTHORITY

By: _____ Date: 9-25-00
John A. Morehead
Executive Director

ATTACHMENT A

Bibliography of Cultural Resource Studies Conducted to Support BRAC Disposal of Savanna Army Depot Activity Properties

Ball, Donald B.
1997 *A Cultural Resources Reconnaissance of A Proposed 164 Acre Prison Site, Savanna Army Depot Activity, Jo Daviess County, Illinois*. Report prepared by the U.S. Army Corps of Engineers, Louisville District.

Hardlines
1997 *Architectural Inventory of a Portion of the Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois*. A report prepared for the U.S. Army Corps of Engineers, Louisville District by Hardlines: Design and Delineation, a subcontractor of International Technology, Inc.

Miller, Orloff G., Sarah Adams, and E. Jeanne Harris
1999 *Phase I Archaeological Survey of ca. 212 Acres (85.8 hectares) at the Savanna Army Depot Activity, Carroll County Illinois*. A report prepared for the U.S. Army Corps of Engineers, Louisville District by Gray and Pape, Inc.

Whitman, Linda G. and Nathan Young
1998 *Phase I Literature Review and Archaeological Cultural Resource Survey of 210 Acres (85 ha) at Savanna Army Depot Activity, Carroll County, Illinois*. A report prepared for the U.S. Army Corps of Engineers, Louisville District by ASC Group, Inc., a subcontractor of the IT Corporation.

ATTACHMENT B

Savanna Army Depot Activity, Illinois
Known Historic Properties on or Eligible for
the National Register of Historic Places
that will be Disposed of to Non-Federal Entities

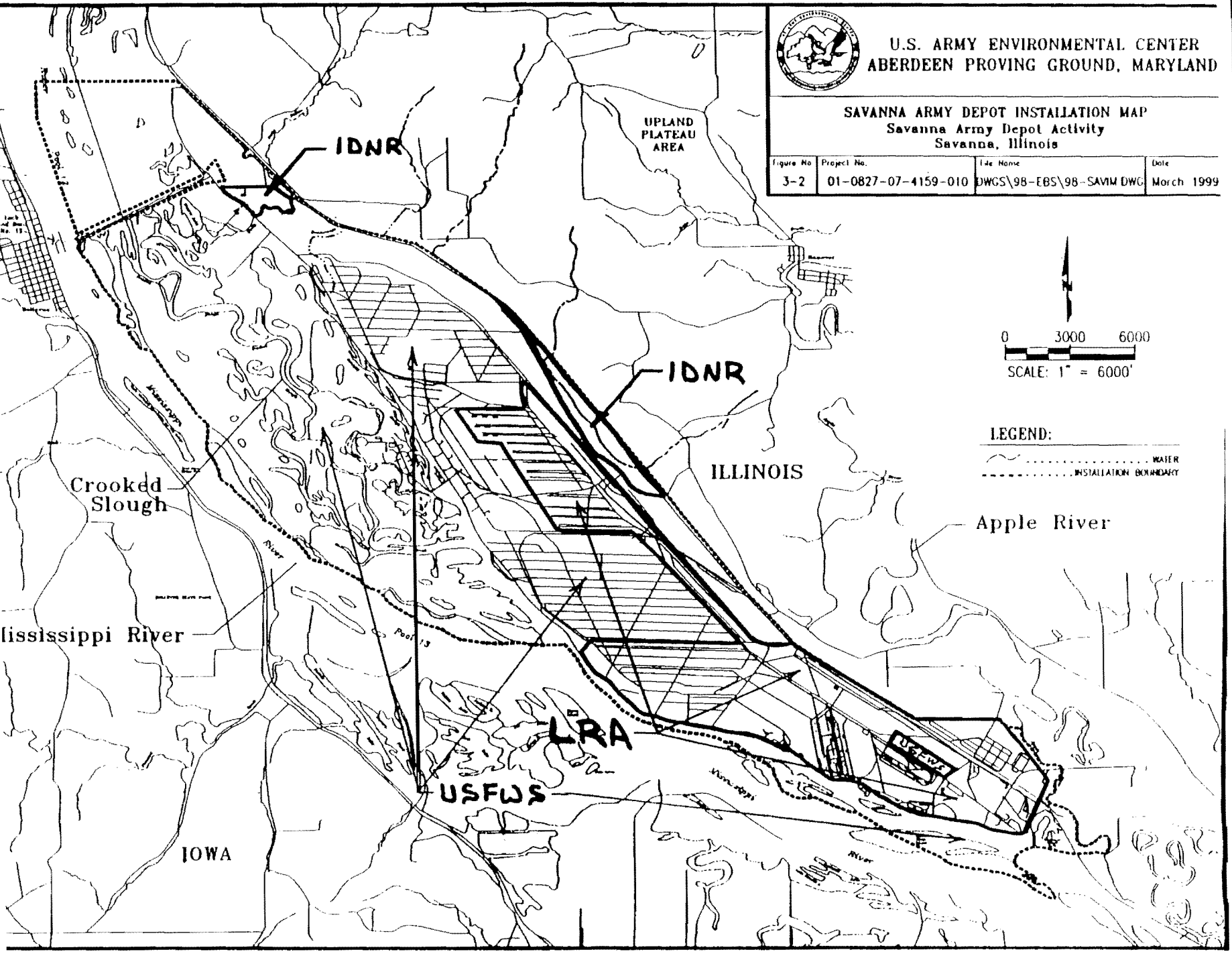
11CA1*
11CA2
11CA3+
11CA139*
11CA142
11CA143*
11CA147
11CA148
11CA149

* Lands making up this archeological site lie within two BRAC disposal parcels, one to be acquired by the local reuse authority and the other by the U.S. Fish and Wildlife Service.

+ The mounds formerly associated with this site have been destroyed, but the site may still have the potential to possess subsurface burials.

ATTACHMMENT C

Map Displaying the Location of
Savanna Army Depot Activity Lands to be
Transferred to Federal and
Non-Federal Entities


U.S. ARMY ENVIRONMENTAL CENTER
ABERDEEN PROVING GROUND, MARYLAND
SAVANNA ARMY DEPOT INSTALLATION MAP
Savanna Army Depot Activity
Savanna, Illinois
Figure No 3-2
Project No. 01-0827-07-4159-010
File Name DWGS\98-EBS\98-SAVIM.DWG
Date March 1999
IDNR
UPLAND PLATEAU AREA
IDNR
ILLINOIS
Crooked Slough
Apple River
lississippi River
Pool 13
LRA
USFWS
IOWA
0 3000 6000
SCALE: 1" = 6000'
LEGEND:
WATER
INSTALLATION BOUNDARY

ATTACHMENT D - **Language to be included in lease and license agreements when archeological sites are present.**

Archeological Property(ies) Lessee (License) Language

Archeological property(ies)XXX is/are (eligible for inclusion in/listed in) the National Register of Historic Places. The Lessee (Licensee) shall ensure that the property(ies) remain(s) undisturbed. The Lessee (Licensee) will notify the Army of any proposed ground disturbance to the archeological property prior to undertaking said ground disturbance. Notification will include a detailed description of the proposed undertaking. If the Army does not object to the proposal within 30 days of receipt of such notification and adequate supporting documentation, the Army will, with the assistance of the Lessee (Licensee), initiate consultation with the Illinois SHPO in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, "Protection of Historic Properties" (36 C.F.R. Part 800). The Lessee (Licensee) will not undertake the proposed action until the Army notifies the Lessee (Licensee) that the requirements of Section 106 have been fulfilled and the Lessee (Licensee) may proceed. If the Army objects to the Lessee's (Licensee's) proposed ground disturbance, the Lessee shall not undertake the proposed action.

ATTACHMENT E: STANDARD PRESERVATION COVENANT FOR CONVEYANCE OF PROPERTY THAT INCLUDES ARCHEOLOGICAL SITES

1. In consideration of the conveyance of the real property that includes the [official number(s) designation of archeological site(s)] located in the County of [name of county], Illinois, which is more fully described as [insert legal description], [Name of property recipient] hereby covenants on behalf of [himself/herself/itself], [his/her/its] heirs, successors, and assigns at all times to the Illinois State Historic Preservation Officer (SHPO), to maintain and preserve [official number(s) designation of archeological site(s)], in accordance with the provisions of paragraphs 2 through 11 of this covenant.

2. (Name of property recipient) will notify the Illinois SHPO in writing prior to undertaking any disturbance of the ground surface or any other action on [official number(s) designation of archeological site(s)] that would affect the physical integrity of this/these site(s). Such notice shall describe in reasonable detail the proposed undertaking and its expected effect on the physical integrity of [official number(s) designation of archeological site(s)].

3. Within thirty (30) calendar days of the Illinois SHPO's receipt of notification provided by (name of property recipient) pursuant to paragraph 2 of this covenant, the SHPO will respond to (name of property recipient) in writing as follows:

(a) That (name of property recipient) may proceed with the proposed undertaking without further consultation; or

(b) That (name of property recipient) must initiate and complete consultation with the Illinois SHPO before (he/she/it) can proceed with the proposed undertaking.

If the Illinois SHPO fails to respond to the (name of property recipient)'s written notice within thirty (30) calendar days of the SHPO's receipt of the same, then (name of property recipient) may proceed with the proposed undertaking without further consultation with the SHPO.

4. If the response provided to (name of property recipient) by the Illinois SHPO pursuant to paragraph 3 of this covenant requires consultation with the SHPO, then both parties will so consult in good faith to arrive at mutually-agreeable and appropriate measures that (name of property recipient) will employ to mitigate any adverse effects associated with the proposed undertaking. If the parties are unable to arrive at such mutually-agreeable mitigation measures, then (name of property recipient) shall, at a minimum, undertake recordation

for the concerned property--in accordance with the Secretary of Interior's standards for recordation and any applicable state standards for recordation, or in accordance with such other standards to which the parties may mutually agree--prior to proceeding with the proposed undertaking. Pursuant to this covenant, any mitigation measures to which (name of property recipient) and the SHPO mutually agree, or any recordation that may be required, shall be carried out solely at the expense of (name of property recipient).

5. [Name of recipient] shall make every reasonable effort to prohibit any person from vandalizing or otherwise disturbing any archeological site determined by the Illinois SHPO to be eligible for inclusion in the National Register of Historic Places. Any such vandalization or disturbance shall be promptly reported to the Illinois SHPO.

6. The Illinois SHPO shall be permitted at all reasonable time to inspect [parcel designation] in order to ascertain its condition and to fulfill its responsibilities hereunder.

7. In the event of a violation of this covenant, and in addition to any remedy now or hereafter provided by law, the Illinois SHPO may, following reasonable notice to [name of recipient], institute suit to enjoin said violation or to require the restoration of any archeological site affected by such violation.

8. [Name of recipient] agrees that the Illinois SHPO may, at its discretion, after 30 days notice to [name of recipient], convey and assign all or part of its rights and responsibilities contained in this covenant to a third party.

9. This covenant is binding on [name of recipient], [his/her/its] heirs, successors, and assigns in perpetuity. Restrictions, stipulations, and covenants contained herein shall be inserted by [name of recipient] verbatim or by express reference in any deed or other legal instrument by which [he/she/it] divests [himself/herself/itself] of either the fee simple title or any other lesser estate in [parcel designation] or any part thereof.

10. The failure of the Illinois SHPO to exercise any right or remedy granted under this instrument shall not have the effect of waiving or limiting the exercise of any other right or remedy or the use of such right or remedy at any other time.

11. The covenant shall be a binding servitude upon the real property that includes [official number(s) designation of archeological site(s)] and shall be deemed to run with the land. Execution of this covenant shall constitute conclusive evidence

that [name of recipient] agrees to be bound by the foregoing conditions and restrictions and to perform the obligations herein set forth.

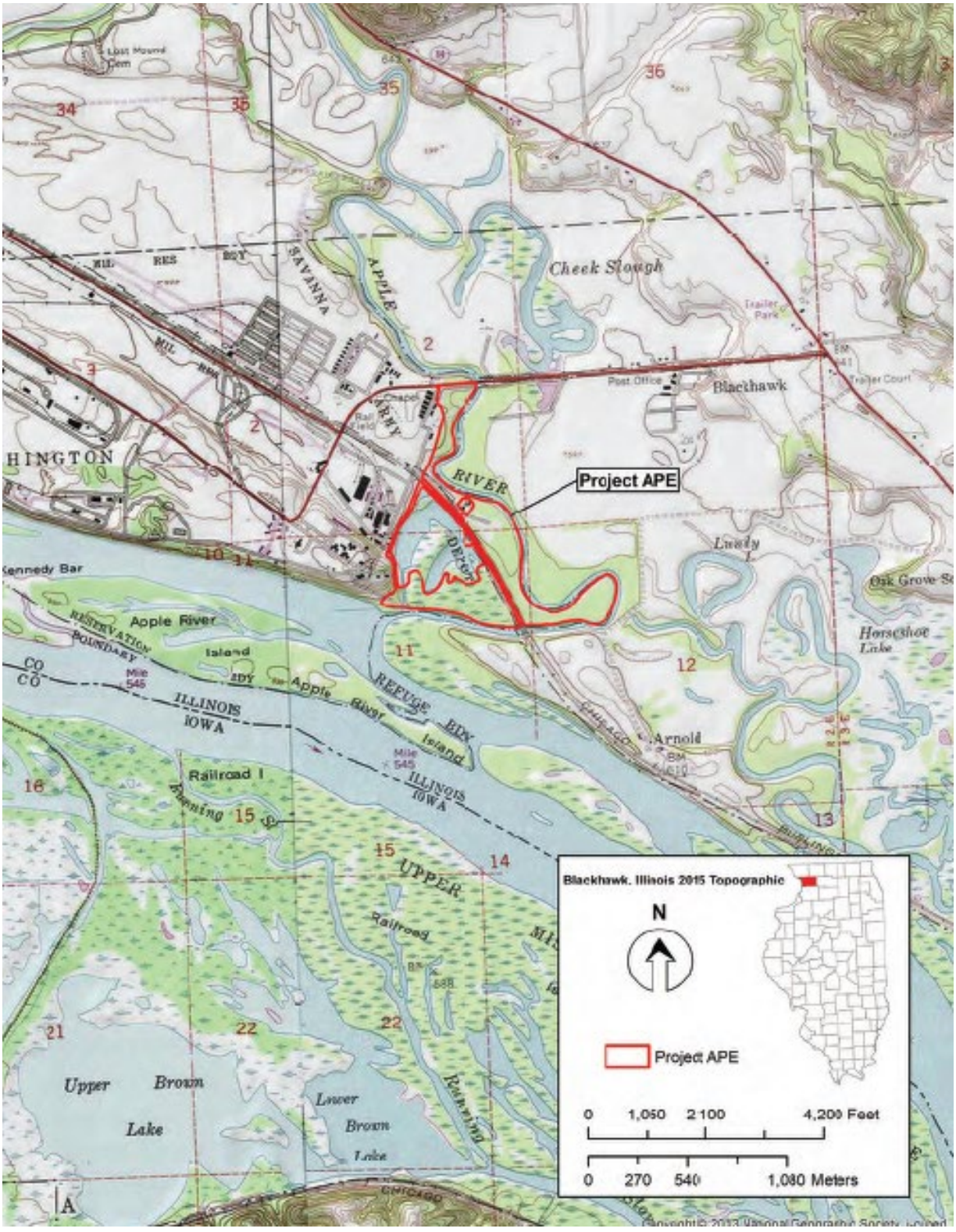
Enclosure 3: Site Map



LEGEND

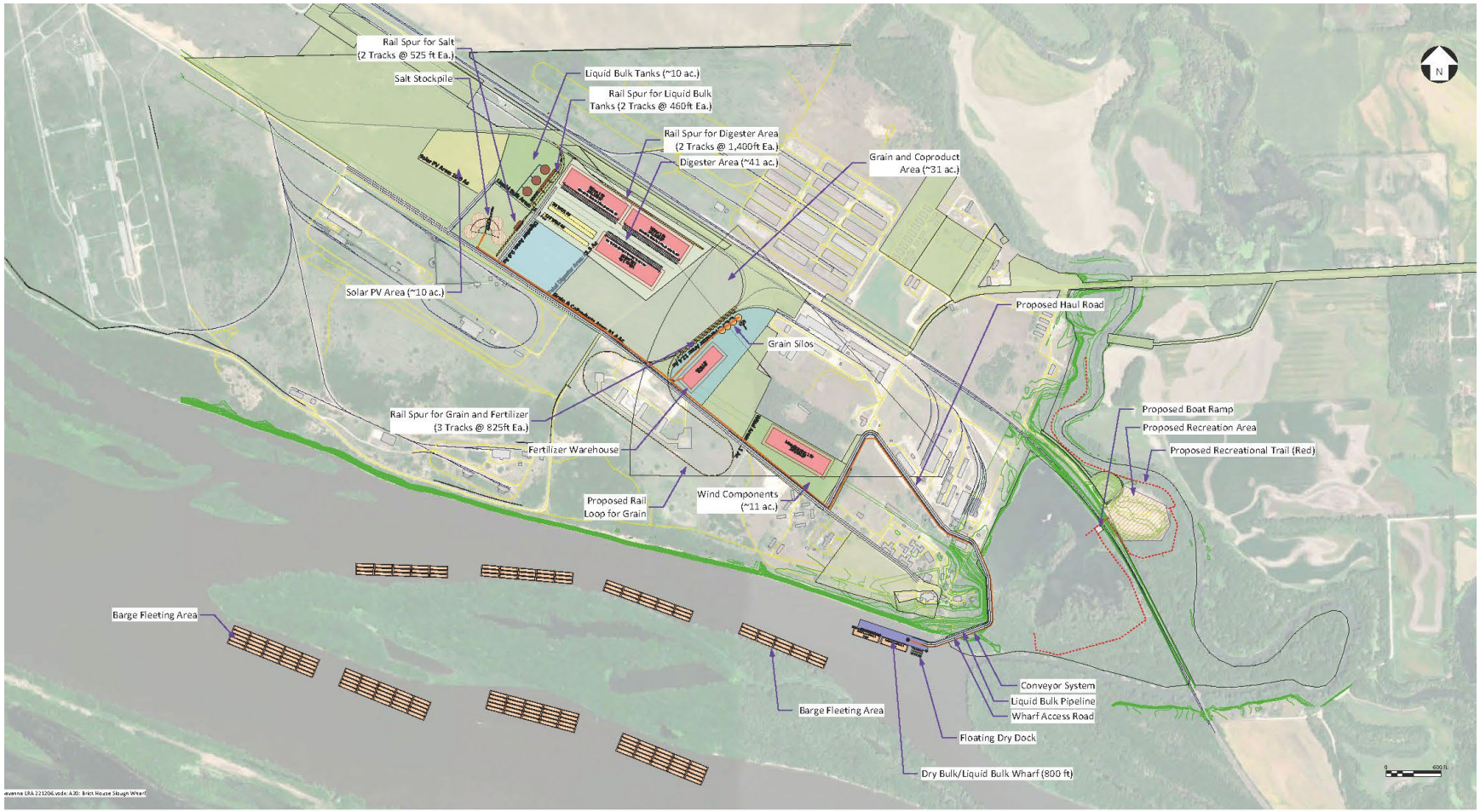
LRA Parcel 20 Boundary

Enclosure 4: Topographic Map

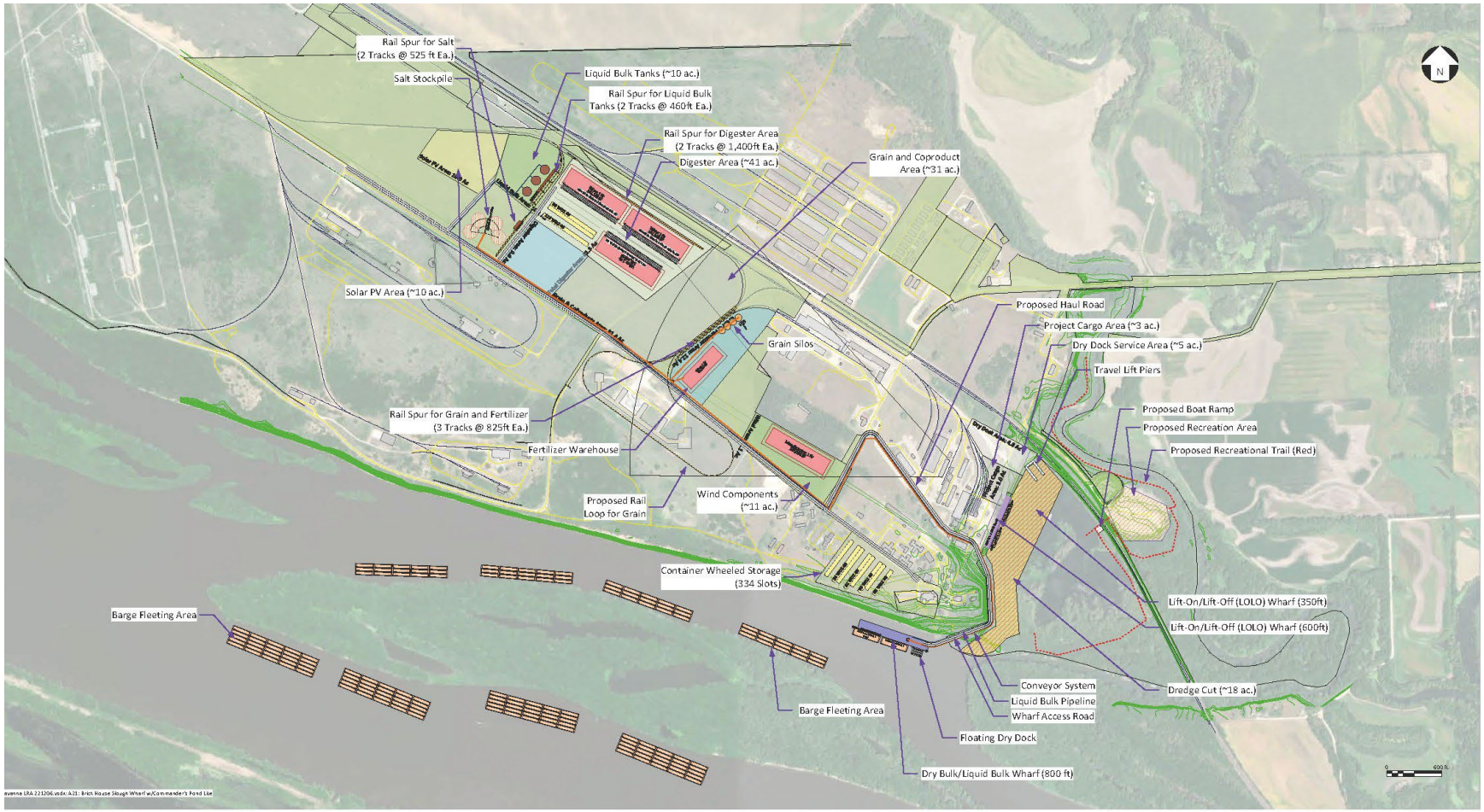


Source: Brockington and Associates, Inc. 2021. *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois*. Brockington and Associates, Inc., Atlanta, GA.

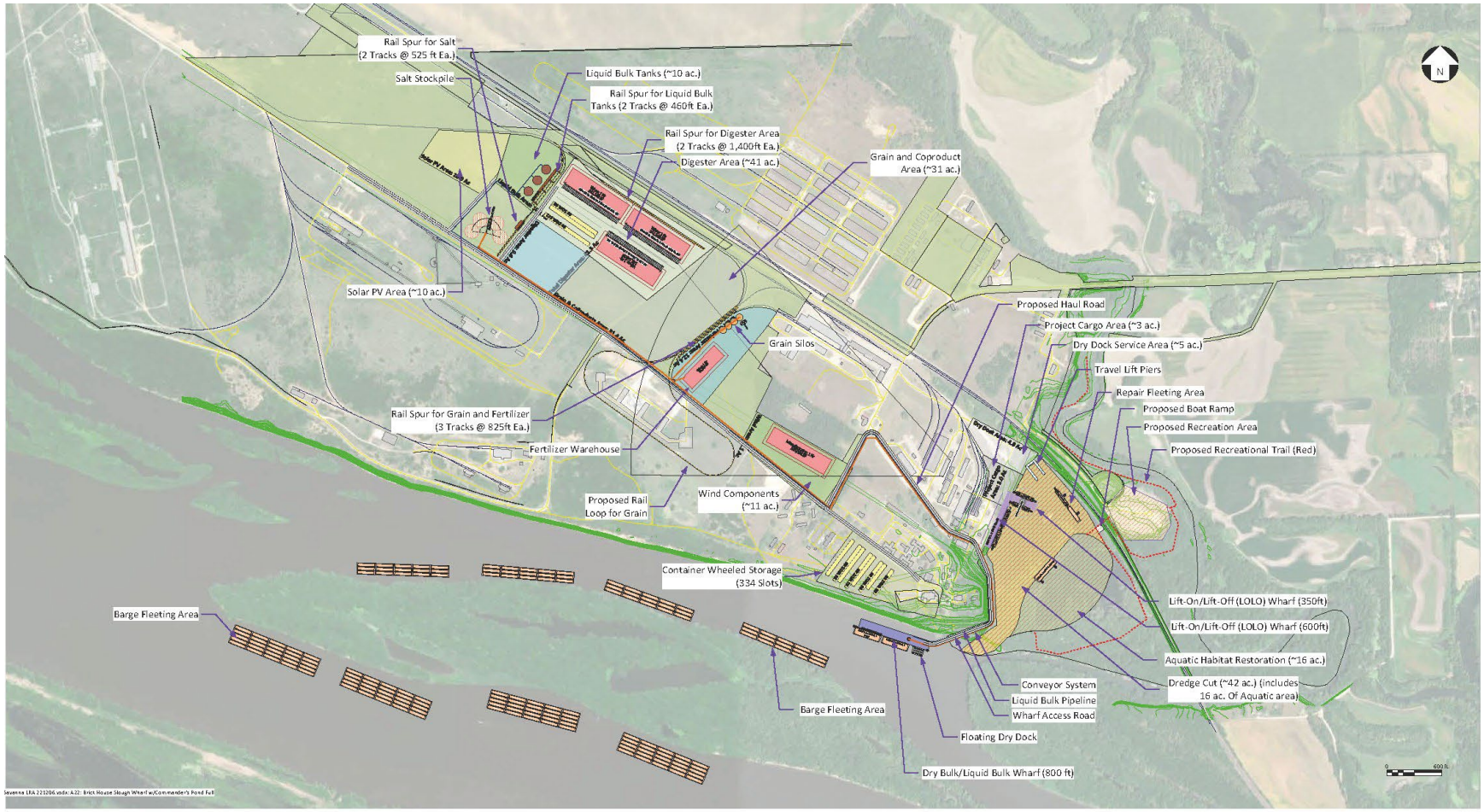
Enclosure 5: LRA Brickhouse Slough Reuse Alternative



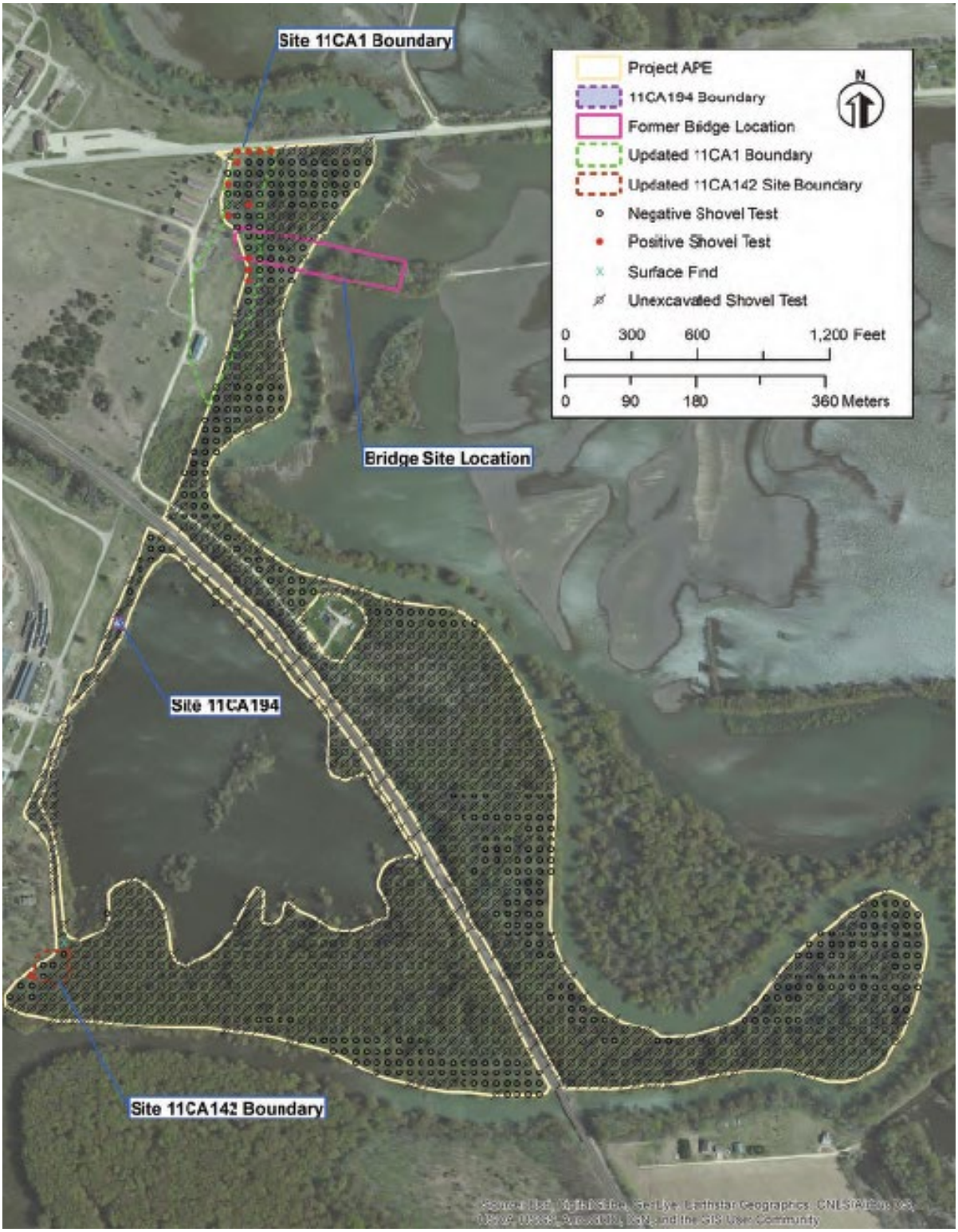
Enclosure 6: LRA Commander's Pond Lite Reuse Alternative



Enclosure 7: LRA Commander's Pond Full Reuse Alternative



Enclosure 8: Archaeological Sites Map



Source: Brockington and Associates, Inc. 2021. *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois*. Brockington and Associates, Inc., Atlanta, GA.

Enclosure 9: Illinois SHPO Letter

ILLINOIS DEPARTMENT OF NATURAL RESOURCES

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

Carroll County
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

PLEASE REFER TO: SHPO Log #005022420

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

Enclosure 10: Preservation Covenant

PRESERVATION COVENANT
SVADA LRA Parcel 20

(held by Illinois Department of Natural Resources)

In consideration of the conveyance of certain real property, hereinafter referred to as the

SVADA LRA Parcel 20, located in Carroll County, Illinois, which is more fully describes as:

The Savanna Army Depot Activity (SVADA) local redevelopment authority (LRA) Parcel 20 at the southern end of SVADA in Carroll County, Illinois. The parcel is bounded by the Apple River to the east and south; the Mississippi River to the west; Vincent Road and Rofsteck Road to the northwest; and Crim Road to the north. The parcel is bisected from the northwest to the southeast by an active railroad line owned by the Burlington Northern Santa Fe Railway Company; the rail line is not part of the parcel to be transferred. A sewage treatment plant owned by the U.S. Army is surrounded by LRA Parcel 20, also is not part of the parcel to be transferred (Figure 1).

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.
3. Additional archaeological testing, NRHP site evaluations, and potential mitigation measures require additional Illinois SHPO consultation and Section 106 of the National Historic Preservation Act (NHPA) compliance measures, as required by law.
4. Execution of this Covenant shall include all applicable conditions, restrictions, laws, orders, and obligations set forth in the SVADA Programmatic Agreement (PA).
5. Conveyance of property that includes archaeological sites:
    a. In consideration of the conveyance of the real property, LRA Parcel 20, which includes the sites 11-CA-1 and 11-CA-142 located in Carroll County, Illinois. Jo-Carroll Depot LRA covenants on behalf of itself, its heirs, or successors, and assigns at all times to the Illinois SHPO to maintain and preserve sites 11-CA-1 and 11-CA-142, in accordance with the provisions of this Covenant.
    b. The property recipient will notify the Illinois SHPO in writing prior to any undertaking of any ground disturbance or action on sites that would affect the physical integrity of sites 11-CA-1 and 11-CA-142. Such a notice shall describe in reasonable detail the proposed undertaking and its expected effect on the physical integrity of sites 11-CA-1 and 11-CA-142.

c. Within thirty (30) calendar days of the Illinois SHPO's receipt of notification provided by the LRA, pursuant to this Covenant, the SHPO will respond to the LRA in writing as follows:
    i. That the LRA may proceed with the proposed undertaking without further consultation; or
    ii. That the LRA must initiate and complete additional consultation with the Illinois SHPO before it can proceed with the proposed undertaking; or
    iii. If the Illinois SHPO fails to respond to the LRA's written notice within thirty (30) calendar days of the SHPO's receipt of the same, then the LRA may proceed with the proposed undertaking without further consultation with the SHPO.
d. Lease and License:
    i. Archaeological sites 11-CA-1 and 11-CA-142 are potentially eligible for inclusion in the NRHP.
    ii. The Recipient/Lessee shall ensure that the sites remain undisturbed.
    iii. The Recipient/Lessee will notify the Owner of any proposed ground disturbance to the archaeological sites prior to undertaking said ground disturbance.
    iv. Notification will include a detailed description of the proposed undertaking.
    v. If the Army does not object to the proposal within thirty (30) calendar days of receipt of such notification and adequate supporting documentation, the Army will, with the assistance of the Lessee (Licensee), initiate consultation with Illinois SHPO in accordance with NHPA Section 106 and its implementing regulations, "Protection of Historic Properties" (Title 36of the Code of Federal Regulations Part 800).
    vi. The Recipient/Lessee will not undertake the proposed action until the Army notifies the Lessee (Licensee) that the requirements of Section 106 have been fulfilled and the Lessee (Licensee) may proceed.
    vii. If the Army objects to the Recipient's/Lessee's proposed ground disturbance, the Recipient/Lessee shall not undertake the proposed action.
e. The Illinois Department of Natural Resources shall be permitted at all reasonable times to inspect these archaeological sites to ascertain if the above conditions are being observed.
f. In the event of a violation of this Covenant, and in addition to any remedy now or hereafter provided by law, the Illinois Department of Natural Resources may, following reasonable notice to the Owner and Recipient/Lessee, institute suit to enjoin said violation or to require the restoration or mitigation of natural resources, archaeological sites, or structures disturbed by construction, alteration, or disturbance of the ground surface, or structure older than 50 years.
g. The Owner and Recipient/Lessee agrees that the Illinois Department of Natural Resources may at its discretion, without prior written notice to the Owner and Recipient/Lessee, convey and assign all or part of its rights and responsibilities contained herein to a third party.
h. This Covenant is binding on the Owner and Recipient/Lessee, and their successors and assignees in perpetuity. Restrictions, stipulations, and covenants contained herein shall be inserted by Owner and Recipient/Lessee verbatim or by express reference in any deed or other legal instrument by which it divests itself or either the fee simple title or any other lesser estate in this SVADA LRA Parcel 20 or any part thereof.
i. The failure of the Illinois Department of Natural Resources to exercise any right or remedy granted under this instrument shall not have the effect of waiving or limiting the exercise of any other right or remedy or the use of such right or remedy at any other time.

j. This Covenant shall be a binding servitude upon this SVADA LRA Parcel 20 and shall be deemed to run with the land. Execution of this Covenant shall constitute conclusive evidence that the United States Army and/ SVADA LRA agree to be bound by the foregoing conditions and restrictions and to perform the obligations herein set forth.

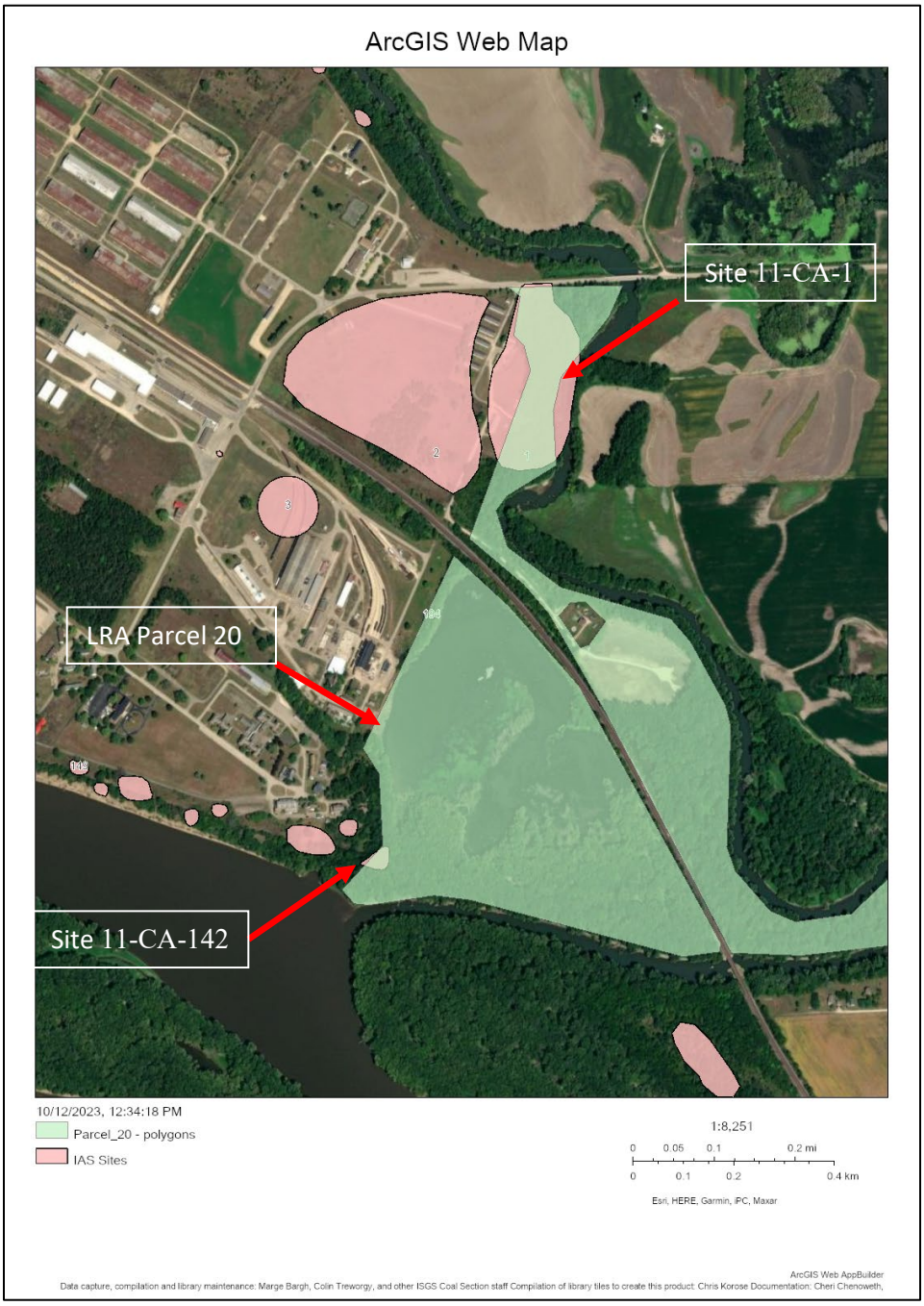
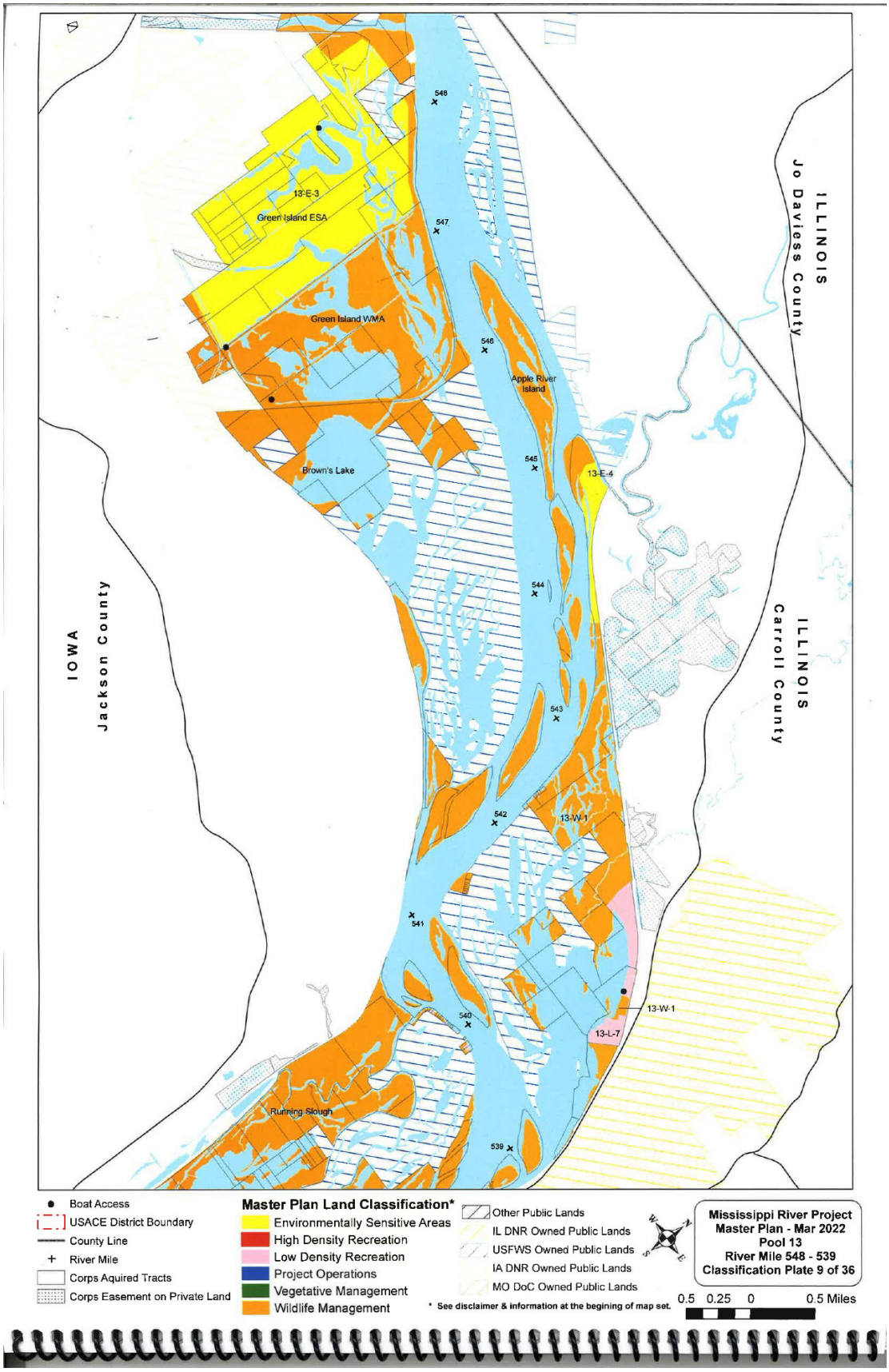


Figure 1. Aerial View of LRA Parcel 20, Showing Sites 11-CA-1 and 11-CA-142.

Enclosure 11: Map of Environmentally Sensitive Area Site 13-E-4



Source: From USACE Master Plan 2022, provided by E. Britton, USFWS, Upper Mississippi River National Wildlife and Fish Refuge, Savanna District Manager, September 6, 2024.

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

September 27, 2024

SUBJECT: Early Coordination 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

Mr. William Quackenbush, THPO
Ho-Chunk Nation of Wisconsin
PO Box 667
Black River Falls, WI 54615

Dear Mr. Quackenbush:

The U.S. Army (Army) is initiating early coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject Environmental Impact Statement (EIS). The Army will prepare the EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500– 1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132- acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois through transfer to the Jo- Carroll Depot Local Redevelopment Authority (LRA) and (2) the potential effects of the LRA's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 environmental impact statement (EIS) evaluated the closure, and the Depot was officially closed in 2000. The subject EIS will tier from the 1997 EIS. In 2000, the *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* (2000 SVADA PA) (Enclosure 2, Programmatic Agreement) was executed in support of the 1997 EIS to ensure adequate consideration of the effect of the closure and disposal on historic properties.

The Army originally initiated consultation with your Tribe for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in November 2023. Based on information received during the EA scoping process, the Army determined preparation of an EIS would be appropriate. The Army will issue a Notice of Intent to prepare the EIS later this year and will notify you of the beginning of the scoping process and of the public scoping meeting date and location.

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Since 2000, through the BRAC process, as former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, the Army has transferred them to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the LRA. The Army already has transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west/northwest.

In 2016, USFWS withdrew interest in the 132-acre parcel of land (formerly known as Parcel FWS 5) at the southeastern end of SVADA. The Army officially identified the parcel as surplus in January 2018. The Army's proposed action is disposal of the parcel, which has been redesignated LRA Parcel 20, through transfer of the property to the LRA. The Army has completed the following remediation at four contaminated cleanup sites on LRA Parcel 20:

- Site 20, Abandoned Landfill: Capped the landfill with "hot spot" removal (i.e., excavating soil containing chemicals of concern at concentrations above recreational remediation goals and buried drums and debris); transported the contaminated soil, drums, and debris to a regulated, licensed solid waste landfill for disposal; conducted site restoration; is conducting long-term monitoring of groundwater and surface water; is maintaining the engineered landfill cap; implemented land use controls that restrict site access, prohibit residential agricultural land use, and prevent intrusive activities; and will conduct further PFAS investigations.
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The EIS will analyze the proposed action of disposal and transfer of Parcel 20, a no action alternative, LRA reuse alternatives, and an alternative under which LRA Parcel 20 would be available for recreational (e.g., walking trail, canoe launch, recreational field) and/or solar use but otherwise remain undeveloped. The LRA's finalized 2023 reuse plan for the parcel is available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-1689879402.pdf, and the appendices to the plan are available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-appendices-1689879402.pdf. The LRA presents three conceptual reuse alternatives for developing LRA Parcel 20 in its plan (Enclosures 5, 6, and 7), which focus on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development under each alternative. To facilitate implementation, the LRA designed the alternatives as sequential phases. The LRA's first reuse alternative, Brickhouse Slough, could be implemented within a target 5-year completion window, while their second reuse alternative, Commander's Pond Lite, and third, Commander's Pond Full, could follow, with both having 5-year-plus completion windows. The LRA's proposed reuse includes activities outside the boundary of LRA Parcel 20 in the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island. All of the LRA's reuse alternatives would require dredging.

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If you have input regarding attending a Tribe and agency scoping meeting, resources of concern to your Tribe, or any questions concerning this BRAC action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2024.09.27 07:34:44 -04'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Savanna Army Depot Activity, Base Environmental Coordinator
Mr. Kent Collier, NAGPRA, Kickapoo Tribe of Oklahoma
Ms. Susan Tiger, NAGPRA Representative, Kickapoo Tribe of Oklahoma
Mr. Darwin Kaskaske, Chairman, Kickapoo Tribe of Oklahoma
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DEPARTMENT OF THE ARMY
OFFICE OF THE DEPUTY CHIEF OF STAFF, G-9
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

September 27, 2024

SUBJECT: Early Coordination 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

Mr. Darwin Kaskaske, Chairman
Kickapoo Tribe of Oklahoma
PO Box 70
McLoud, OK 74851

Dear Chairman Kaskaske:

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BRAC Program Manager
HQDA/ODCS G-9

Enclosures

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

September 27, 2024

SUBJECT: Early Coordination 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

Mr. Kent Collier, NAGPRA
Kickapoo Tribe of Oklahoma
PO Box 70
McLoud, OK 74851

Dear Mr. Collier:

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LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2024.09.27 07:34:44 -04'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Savanna Army Depot Activity, Base Environmental Coordinator
Mr. Kent Collier, NAGPRA, Kickapoo Tribe of Oklahoma
Ms. Susan Tiger, NAGPRA Representative, Kickapoo Tribe of Oklahoma
Mr. Darwin Kaskaske, Chairman, Kickapoo Tribe of Oklahoma
Mr. William Quackenbush, THPO, Ho-Chunk Nation of Wisconsin
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DEPARTMENT OF THE ARMY
OFFICE OF THE DEPUTY CHIEF OF STAFF, G-9
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

September 27, 2024

SUBJECT: Early Coordination 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

Ms. Susan Tiger, NAGPRA Representative
Kickapoo Tribe of Oklahoma
PO Box 70
McLoud, OK 74851

Dear Ms. Tiger:

The U.S. Army (Army) is initiating early coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject Environmental Impact Statement (EIS). The Army will prepare the EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500– 1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132- acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois through transfer to the Jo- Carroll Depot Local Redevelopment Authority (LRA) and (2) the potential effects of the LRA's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 environmental impact statement (EIS) evaluated the closure, and the Depot was officially closed in 2000. The subject EIS will tier from the 1997 EIS. In 2000, the *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* (2000 SVADA PA) (Enclosure 2, Programmatic Agreement) was executed in support of the 1997 EIS to ensure adequate consideration of the effect of the closure and disposal on historic properties.

The Army originally initiated consultation with your Tribe for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in November 2023. Based on information received during the EA scoping process, the Army determined preparation of an EIS would be appropriate. The Army will issue a Notice of Intent to prepare the EIS later this year and will notify you of the beginning of the scoping process and of the public scoping meeting date and location.

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At this time, the Army is initiating early coordination with you for the EIS to request (1) your input on the Army holding a Tribe and agency meeting separate from the public scoping meeting and (2) any comments you might have on proposed action alternatives and effects, as well as relevant information, studies, or analysis with respect to the proposed action. The remainder of this letter provides information on the project location, the proposed action, and alternatives.

The 132-acre parcel is undeveloped land in Carroll County, IL (Enclosure 3, Site Map and Enclosure 4, Topographic Map; *Note*: General Land Office historical maps were not available from the Bureau of Land Management website.) The parcel includes Commander's Pond (formerly known as Ordnance School Lake). The parcel is bordered on the east and south by the Apple River, a tributary of the Mississippi River; the Mississippi River on the southwest; Vincent Road and Rofsteck Road on the west; and Crim Road on the north. While these rivers and roads form the boundaries of the parcel, they are not part of it. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by the 132-acre parcel, also is not part of the parcel to be transferred.

Since 2000, through the BRAC process, as former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, the Army has transferred them to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the LRA. The Army already has transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west/northwest.

In 2016, USFWS withdrew interest in the 132-acre parcel of land (formerly known as Parcel FWS 5) at the southeastern end of SVADA. The Army officially identified the parcel as surplus in January 2018. The Army's proposed action is disposal of the parcel, which has been redesignated LRA Parcel 20, through transfer of the property to the LRA. The Army has completed the following remediation at four contaminated cleanup sites on LRA Parcel 20:

- Site 20, Abandoned Landfill: Capped the landfill with "hot spot" removal (i.e., excavating soil containing chemicals of concern at concentrations above recreational remediation goals and buried drums and debris); transported the contaminated soil, drums, and debris to a regulated, licensed solid waste landfill for disposal; conducted site restoration; is conducting long-term monitoring of groundwater and surface water; is maintaining the engineered landfill cap; implemented land use controls that restrict site access, prohibit residential agricultural land use, and prevent intrusive activities; and will conduct further PFAS investigations.
- Site 73, Stables Landfill: Conducted surface debris removal, soil excavation, and off-site disposal.
- Site 130, Vincent Road Septic System: Conducted soil and groundwater sampling. The human health risks were determined to be acceptable for receptors and specified land uses and the preferred remedy was No Further Action.
- Site 178, Shop Area (Buildings 100–129) Sanitary and Stormwater Sewer Lines and Outfalls to Ordnance School Lake: Conducted soil and sediment excavation, off-site disposal, and implemented LUCs to prevent the site from being used for purposes other than industrial/commercial and recreational.

The EIS will analyze the proposed action of disposal and transfer of Parcel 20, a no action alternative, LRA reuse alternatives, and an alternative under which LRA Parcel 20 would be available for recreational (e.g., walking trail, canoe launch, recreational field) and/or solar use but otherwise remain undeveloped. The LRA's finalized 2023 reuse plan for the parcel is available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-1689879402.pdf, and the appendices to the plan are available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-appendices-1689879402.pdf. The LRA presents three conceptual reuse alternatives for developing LRA Parcel 20 in its plan (Enclosures 5, 6, and 7), which focus on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development under each alternative. To facilitate implementation, the LRA designed the alternatives as sequential phases. The LRA's first reuse alternative, Brickhouse Slough, could be implemented within a target 5-year completion window, while their second reuse alternative, Commander's Pond Lite, and third, Commander's Pond Full, could follow, with both having 5-year-plus completion windows. The LRA's proposed reuse includes activities outside the boundary of LRA Parcel 20 in the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island. All of the LRA's reuse alternatives would require dredging.

The 2000 SVADA PA is still in effect. A complete Phase I archaeological survey of LRA Parcel 20 was conducted by Brockington Associates (Brockington) in 2020. LRA Parcel 20 has no known buildings, structures, or traditional cultural properties currently listed in the National Register of Historic Places (NRHP). Two archaeological sites within LRA Parcel 20 (sites 11-CA-1 and 11-CA-142) are identified as potentially eligible for listing in the NRHP, and a third site (Site 11-CA-194) is not eligible (Enclosure 8, Archaeological Sites Map). Brockington provided the survey report to the Illinois State Historic Preservation Office (SHPO) on November 4, 2020. The Illinois SHPO responded in a letter dated December 24, 2020, that the project as proposed would have no adverse effect on the two potentially eligible sites and that Site 11-CA-194 is not eligible for listing in the NRHP, but that any plan modifications must include Illinois SHPO notification (Enclosure 9, SHPO letter dated December 24, 2020). Brockington finalized the *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois* in January 2021.

If any sites are determined to be NRHP eligible through additional archaeological testing within LRA Parcel 20, cultural resources encumbrances in the form of a preservation covenant will apply in perpetuity, as appropriate, based on the 2000 SVADA PA and in consultation with the Illinois SHPO under NHPA Section 106 (Enclosure 10, Preservation Covenant).

A portion of the east shoreline of Brickhouse Slough outside Parcel 20 at about River Miles 545-544, is a designated Environmentally Sensitive Area (Site 13-E-4) by the USACE due to its archaeological significance (Enclosure 11). This site is identified by the Illinois SHPO as Site 11CA60**.** The site is bounded by a sandy bank that is susceptible to erosion from traffic along the river. Previous mitigation efforts were performed by the USACE to support the bank using riprap; however, these efforts may not prevent the site from being exposed to further degradation. No information on the cultural resources at the site are available, and the site's eligibility is undetermined.

If you have input regarding attending a Tribe and agency scoping meeting, resources of concern to your Tribe, or any questions concerning this BRAC action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter.

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

September 27, 2024

SUBJECT: Early Coordination 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

Ms. Melissa Wiatrolik, THPO
Little Traverse Bay Bands of Odawa Indians, Michigan
7500 Odawa Circle
Harbor Springs, MI 49740

Dear Ms. Wiatrolik:

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BRAC Program Manager
HQDA/ODCS G-9

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DEPARTMENT OF THE ARMY
OFFICE OF THE DEPUTY CHIEF OF STAFF, G-9
600 ARMY PENTAGON
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September 27, 2024

SUBJECT: Early Coordination 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

Ms. Regina Gasco-Bentley, Chairperson
Little Traverse Bay Bands of Odawa Indians, Michigan
7500 Odawa Circle
Harbor Springs, MI 49740

Dear Chairperson Gasco-Bentley:

The U.S. Army (Army) is initiating early coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject Environmental Impact Statement (EIS). The Army will prepare the EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500– 1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132- acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois through transfer to the Jo- Carroll Depot Local Redevelopment Authority (LRA) and (2) the potential effects of the LRA's secondary indirect action of reuse of the parcel.

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If you have input regarding attending a Tribe and agency scoping meeting, resources of concern to your Tribe, or any questions concerning this BRAC action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2024.09.27 07:34:44 -04'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Savanna Army Depot Activity, Base Environmental Coordinator
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DEPARTMENT OF THE ARMY
OFFICE OF THE DEPUTY CHIEF OF STAFF, G-9
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

September 27, 2024

SUBJECT: Early Coordination 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

Mr. David Grignon, THPO
Menominee Indian Tribe of Wisconsin
PO Box 910
Keshena, WI 54135

Dear Mr. Grignon:

The U.S. Army (Army) is initiating early coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject Environmental Impact Statement (EIS). The Army will prepare the EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500– 1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132- acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois through transfer to the Jo- Carroll Depot Local Redevelopment Authority (LRA) and (2) the potential effects of the LRA's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 environmental impact statement (EIS) evaluated the closure, and the Depot was officially closed in 2000. The subject EIS will tier from the 1997 EIS. In 2000, the *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* (2000 SVADA PA) (Enclosure 2, Programmatic Agreement) was executed in support of the 1997 EIS to ensure adequate consideration of the effect of the closure and disposal on historic properties.

The Army originally initiated consultation with your Tribe for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in November 2023. Based on information received during the EA scoping process, the Army determined preparation of an EIS would be appropriate. The Army will issue a Notice of Intent to prepare the EIS later this year and will notify you of the beginning of the scoping process and of the public scoping meeting date and location.

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The 132-acre parcel is undeveloped land in Carroll County, IL (Enclosure 3, Site Map and Enclosure 4, Topographic Map; *Note*: General Land Office historical maps were not available from the Bureau of Land Management website.) The parcel includes Commander's Pond (formerly known as Ordnance School Lake). The parcel is bordered on the east and south by the Apple River, a tributary of the Mississippi River; the Mississippi River on the southwest; Vincent Road and Rofsteck Road on the west; and Crim Road on the north. While these rivers and roads form the boundaries of the parcel, they are not part of it. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by the 132-acre parcel, also is not part of the parcel to be transferred.

Since 2000, through the BRAC process, as former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, the Army has transferred them to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the LRA. The Army already has transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west/northwest.

In 2016, USFWS withdrew interest in the 132-acre parcel of land (formerly known as Parcel FWS 5) at the southeastern end of SVADA. The Army officially identified the parcel as surplus in January 2018. The Army's proposed action is disposal of the parcel, which has been redesignated LRA Parcel 20, through transfer of the property to the LRA. The Army has completed the following remediation at four contaminated cleanup sites on LRA Parcel 20:

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HQDA/ODCS G-9

Enclosures

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600 ARMY PENTAGON
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September 27, 2024

SUBJECT: Early Coordination 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

Ms. Gena Kakkak, Chairwoman
Menominee Indian Tribe of Wisconsin
PO Box 910
Keshena, WI 54135

Dear Chairwoman Kakkak:

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HQDA/ODCS G-9

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September 27, 2024

SUBJECT: Early Coordination 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

Mr. Douglas Lankford, Chief
Miami Tribe of Oklahoma
PO Box 1326
Miami, OK 74355

Dear Chief Lankford:

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LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2024.09.27 07:34:44 -04'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

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

September 27, 2024

SUBJECT: Early Coordination 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

Mr. Logan York, THPO
Miami Tribe of Oklahoma
PO Box 1326
Miami, OK 74355

Dear Mr. York:

The U.S. Army (Army) is initiating early coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject Environmental Impact Statement (EIS). The Army will prepare the EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500– 1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132- acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois through transfer to the Jo- Carroll Depot Local Redevelopment Authority (LRA) and (2) the potential effects of the LRA's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 environmental impact statement (EIS) evaluated the closure, and the Depot was officially closed in 2000. The subject EIS will tier from the 1997 EIS. In 2000, the *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* (2000 SVADA PA) (Enclosure 2, Programmatic Agreement) was executed in support of the 1997 EIS to ensure adequate consideration of the effect of the closure and disposal on historic properties.

The Army originally initiated consultation with your Tribe for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in November 2023. Based on information received during the EA scoping process, the Army determined preparation of an EIS would be appropriate. The Army will issue a Notice of Intent to prepare the EIS later this year and will notify you of the beginning of the scoping process and of the public scoping meeting date and location.

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DEPARTMENT OF THE ARMY
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600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

September 27, 2024

COVER LETTER

Dr. Andrea Hunter, Director and THPO
Historic Preservation Office
The Osage Nation
627 Grandview Ave.
Pawhuska, OK 74056

Dear Dr. Hunter:

The U.S. Army is initiating early coordination with your office under Section 106 of the National Historic Preservation Act for the following project.

- Federal Agency Name: Department of the Army
- Point of Contact:
  - Name and Address: Mr. Todd Knuth
    Department of the Army
    Savanna Army Depot Activity
    18935 B Street
    Savanna, IL 61074
  - Email: william.t.knuth.civ@army.mil
  - Phone: 815-273-8312
- Project Name: Environmental Impact Statement for the Implementation of Base Realignment and Closure Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois
- Project Location (coordinates based on a point located near the middle of LRA Parcel 20):
  - USPLSS:
    - USGS Quadrangle: Blackhawk, IL
    - Township: 25N
    - Range: 2E
    - Sections: 2, 11, and 12
  - UTM (WGS84) coordinates: Zone 15N 728200E 4673572N
- Total Area surveyed in acres: 132 acres

The following letter provides further information on the project.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375
Digitally signed by LINEER.THOMAS.ALDEN.1172258375
Date: 2024.09.27 07:35:46 -04'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

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

September 27, 2024

SUBJECT: Early Coordination 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

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HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Savanna Army Depot Activity, Base Environmental Coordinator
Mr. Kent Collier, NAGPRA, Kickapoo Tribe of Oklahoma
Ms. Susan Tiger, NAGPRA Representative, Kickapoo Tribe of Oklahoma
Mr. Darwin Kaskaske, Chairman, Kickapoo Tribe of Oklahoma
Mr. William Quackenbush, THPO, Ho-Chunk Nation of Wisconsin
Mr. John Greendeer, President, Ho-Chunk Nation of Wisconsin
Ms. Melissa Wiatrolik, THPO, Little Traverse Bay Bands of Odawa Indians
Ms. Regina Gasco-Bentley, Chairperson, Little Traverse Bay Bands of Odawa Indians
Mr. David Grignon, THPO, Menominee Indian Tribe of Wisconsin
Ms. Gena Kakkak, Chairwoman, Menominee Indian Tribe of Wisconsin
Mr. Logan York, THPO, Miami Tribe of Oklahoma
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Dr. Andrea Hunter, Director and THPO, Historic Preservation Office, The Osage Nation
Mr. Geoffrey Standing Bear, Principal Chief, The Osage Nation
Ms. Tiauna Carnes, Chairperson, Sac & Fox Nation of Missouri in Kansas and Nebraska
Ms. Sandra Massey, THPO, Sac & Fox Nation, Oklahoma
Mr. Randle Carter, Principal Chief, Sac & Fox Nation, Oklahoma
Mr. Vern Jefferson, Chairman, Sac & Fox Tribe of the Mississippi in Iowa
Mr. Johnathon Buffalo, THPO, Sac & Fox Tribe of the Mississippi in Iowa
Ms. Sunshine Thomas-Bear, THPO, Winnebago Tribe of Nebraska
Ms. Victoria Kitcheyan, Chairwoman, Winnebago Tribe of Nebraska

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

September 27, 2024

SUBJECT: Early Coordination 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

Mr. Geoffrey Standing Bear, Principal Chief
The Osage Nation
PO Box 779
Pawhuska, OK 74056

Dear Principal Chief Standing Bear:

The U.S. Army (Army) is initiating early coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject Environmental Impact Statement (EIS). The Army will prepare the EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500– 1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132- acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois through transfer to the Jo- Carroll Depot Local Redevelopment Authority (LRA) and (2) the potential effects of the LRA's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 environmental impact statement (EIS) evaluated the closure, and the Depot was officially closed in 2000. The subject EIS will tier from the 1997 EIS. In 2000, the *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* (2000 SVADA PA) (Enclosure 2, Programmatic Agreement) was executed in support of the 1997 EIS to ensure adequate consideration of the effect of the closure and disposal on historic properties.

The Army originally initiated consultation with your Tribe for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in November 2023. Based on information received during the EA scoping process, the Army determined preparation of an EIS would be appropriate. The Army will issue a Notice of Intent to prepare the EIS later this year and will notify you of the beginning of the scoping process and of the public scoping meeting date and location.

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At this time, the Army is initiating early coordination with you for the EIS to request (1) your input on the Army holding a Tribe and agency meeting separate from the public scoping meeting and (2) any comments you might have on proposed action alternatives and effects, as well as relevant information, studies, or analysis with respect to the proposed action. The remainder of this letter provides information on the project location, the proposed action, and alternatives.

The 132-acre parcel is undeveloped land in Carroll County, IL (Enclosure 3, Site Map and Enclosure 4, Topographic Map; *Note*: General Land Office historical maps were not available from the Bureau of Land Management website.) The parcel includes Commander's Pond (formerly known as Ordnance School Lake). The parcel is bordered on the east and south by the Apple River, a tributary of the Mississippi River; the Mississippi River on the southwest; Vincent Road and Rofsteck Road on the west; and Crim Road on the north. While these rivers and roads form the boundaries of the parcel, they are not part of it. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by the 132-acre parcel, also is not part of the parcel to be transferred.

Since 2000, through the BRAC process, as former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, the Army has transferred them to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the LRA. The Army already has transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west/northwest.

In 2016, USFWS withdrew interest in the 132-acre parcel of land (formerly known as Parcel FWS 5) at the southeastern end of SVADA. The Army officially identified the parcel as surplus in January 2018. The Army's proposed action is disposal of the parcel, which has been redesignated LRA Parcel 20, through transfer of the property to the LRA. The Army has completed the following remediation at four contaminated cleanup sites on LRA Parcel 20:

- Site 20, Abandoned Landfill: Capped the landfill with "hot spot" removal (i.e., excavating soil containing chemicals of concern at concentrations above recreational remediation goals and buried drums and debris); transported the contaminated soil, drums, and debris to a regulated, licensed solid waste landfill for disposal; conducted site restoration; is conducting long-term monitoring of groundwater and surface water; is maintaining the engineered landfill cap; implemented land use controls that restrict site access, prohibit residential agricultural land use, and prevent intrusive activities; and will conduct further PFAS investigations.
- Site 73, Stables Landfill: Conducted surface debris removal, soil excavation, and off-site disposal.
- Site 130, Vincent Road Septic System: Conducted soil and groundwater sampling. The human health risks were determined to be acceptable for receptors and specified land uses and the preferred remedy was No Further Action.
- Site 178, Shop Area (Buildings 100–129) Sanitary and Stormwater Sewer Lines and Outfalls to Ordnance School Lake: Conducted soil and sediment excavation, off-site disposal, and implemented LUCs to prevent the site from being used for purposes other than industrial/commercial and recreational.

The EIS will analyze the proposed action of disposal and transfer of Parcel 20, a no action alternative, LRA reuse alternatives, and an alternative under which LRA Parcel 20 would be available for recreational (e.g., walking trail, canoe launch, recreational field) and/or solar use but otherwise remain undeveloped. The LRA's finalized 2023 reuse plan for the parcel is available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-1689879402.pdf, and the appendices to the plan are available at https://www.savannaindustrialpark.org/pdf/doc-parcel-20-final-reuse-plan-appendices-1689879402.pdf. The LRA presents three conceptual reuse alternatives for developing LRA Parcel 20 in its plan (Enclosures 5, 6, and 7), which focus on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development under each alternative. To facilitate implementation, the LRA designed the alternatives as sequential phases. The LRA's first reuse alternative, Brickhouse Slough, could be implemented within a target 5-year completion window, while their second reuse alternative, Commander's Pond Lite, and third, Commander's Pond Full, could follow, with both having 5-year-plus completion windows. The LRA's proposed reuse includes activities outside the boundary of LRA Parcel 20 in the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island. All of the LRA's reuse alternatives would require dredging.

The 2000 SVADA PA is still in effect. A complete Phase I archaeological survey of LRA Parcel 20 was conducted by Brockington Associates (Brockington) in 2020. LRA Parcel 20 has no known buildings, structures, or traditional cultural properties currently listed in the National Register of Historic Places (NRHP). Two archaeological sites within LRA Parcel 20 (sites 11-CA-1 and 11-CA-142) are identified as potentially eligible for listing in the NRHP, and a third site (Site 11-CA-194) is not eligible (Enclosure 8, Archaeological Sites Map). Brockington provided the survey report to the Illinois State Historic Preservation Office (SHPO) on November 4, 2020. The Illinois SHPO responded in a letter dated December 24, 2020, that the project as proposed would have no adverse effect on the two potentially eligible sites and that Site 11-CA-194 is not eligible for listing in the NRHP, but that any plan modifications must include Illinois SHPO notification (Enclosure 9, SHPO letter dated December 24, 2020). Brockington finalized the *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois* in January 2021.

If any sites are determined to be NRHP eligible through additional archaeological testing within LRA Parcel 20, cultural resources encumbrances in the form of a preservation covenant will apply in perpetuity, as appropriate, based on the 2000 SVADA PA and in consultation with the Illinois SHPO under NHPA Section 106 (Enclosure 10, Preservation Covenant).

A portion of the east shoreline of Brickhouse Slough outside Parcel 20 at about River Miles 545-544, is a designated Environmentally Sensitive Area (Site 13-E-4) by the USACE due to its archaeological significance (Enclosure 11). This site is identified by the Illinois SHPO as Site 11CA60**.** The site is bounded by a sandy bank that is susceptible to erosion from traffic along the river. Previous mitigation efforts were performed by the USACE to support the bank using riprap; however, these efforts may not prevent the site from being exposed to further degradation. No information on the cultural resources at the site are available, and the site's eligibility is undetermined.

If you have input regarding attending a Tribe and agency scoping meeting, resources of concern to your Tribe, or any questions concerning this BRAC action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2024.09.27 07:34:44 -04'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Savanna Army Depot Activity, Base Environmental Coordinator
Mr. Kent Collier, NAGPRA, Kickapoo Tribe of Oklahoma
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DEPARTMENT OF THE ARMY
OFFICE OF THE DEPUTY CHIEF OF STAFF, G-9
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

September 27, 2024

SUBJECT: Early Coordination 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

Ms. Tiauna Carnes, Chairperson
Sac & Fox Nation of Missouri in Kansas and Nebraska
305 North Main St.
Reserve, KS 66434

Dear Chairperson Carnes:

The U.S. Army (Army) is initiating early coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject Environmental Impact Statement (EIS). The Army will prepare the EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500– 1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132- acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois through transfer to the Jo- Carroll Depot Local Redevelopment Authority (LRA) and (2) the potential effects of the LRA's secondary indirect action of reuse of the parcel.

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Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

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September 27, 2024

SUBJECT: Early Coordination 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

Mr. Johnathon Buffalo, THPO
Sac & Fox Tribe of the Mississippi in Iowa
349 Meskwaki Rd.
Tama, IA 52339

Dear Mr. Buffalo:

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If you have input regarding attending a Tribe and agency scoping meeting, resources of concern to your Tribe, or any questions concerning this BRAC action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2024.09.27 07:34:44 -04'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, Savanna Army Depot Activity, Base Environmental Coordinator
Mr. Kent Collier, NAGPRA, Kickapoo Tribe of Oklahoma
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DEPARTMENT OF THE ARMY
OFFICE OF THE DEPUTY CHIEF OF STAFF, G-9
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

September 27, 2024

SUBJECT: Early Coordination 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

Mr. Vern Jefferson, Chairman
Sac & Fox Tribe of the Mississippi in Iowa
349 Meskwaki Rd.
Tama, IA 52339

Dear Chairman Jefferson:

The U.S. Army (Army) is initiating early coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject Environmental Impact Statement (EIS). The Army will prepare the EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500– 1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132- acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois through transfer to the Jo- Carroll Depot Local Redevelopment Authority (LRA) and (2) the potential effects of the LRA's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 environmental impact statement (EIS) evaluated the closure, and the Depot was officially closed in 2000. The subject EIS will tier from the 1997 EIS. In 2000, the *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* (2000 SVADA PA) (Enclosure 2, Programmatic Agreement) was executed in support of the 1997 EIS to ensure adequate consideration of the effect of the closure and disposal on historic properties.

The Army originally initiated consultation with your Tribe for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in November 2023. Based on information received during the EA scoping process, the Army determined preparation of an EIS would be appropriate. The Army will issue a Notice of Intent to prepare the EIS later this year and will notify you of the beginning of the scoping process and of the public scoping meeting date and location.

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The 132-acre parcel is undeveloped land in Carroll County, IL (Enclosure 3, Site Map and Enclosure 4, Topographic Map; *Note*: General Land Office historical maps were not available from the Bureau of Land Management website.) The parcel includes Commander's Pond (formerly known as Ordnance School Lake). The parcel is bordered on the east and south by the Apple River, a tributary of the Mississippi River; the Mississippi River on the southwest; Vincent Road and Rofsteck Road on the west; and Crim Road on the north. While these rivers and roads form the boundaries of the parcel, they are not part of it. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by the 132-acre parcel, also is not part of the parcel to be transferred.

Since 2000, through the BRAC process, as former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980, the Army has transferred them to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the LRA. The Army already has transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west/northwest.

In 2016, USFWS withdrew interest in the 132-acre parcel of land (formerly known as Parcel FWS 5) at the southeastern end of SVADA. The Army officially identified the parcel as surplus in January 2018. The Army's proposed action is disposal of the parcel, which has been redesignated LRA Parcel 20, through transfer of the property to the LRA. The Army has completed the following remediation at four contaminated cleanup sites on LRA Parcel 20:

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Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

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DEPARTMENT OF THE ARMY
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600 ARMY PENTAGON
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September 27, 2024

SUBJECT: Early Coordination 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

Mr. Randle Carter, Principal Chief
Sac & Fox Nation, Oklahoma
920883 South Highway 99 Building A
Stroud, OK 74079

Dear Principal Chief Carter:

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Thomas Lineer
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HQDA/ODCS G-9

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September 27, 2024

SUBJECT: Early Coordination 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

Ms. Sandra Massey, THPO
Sac & Fox Nation, Oklahoma
920883 South Highway 99 Building A
Stroud, OK 74079

Dear Ms. Massey:

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BRAC Program Manager
HQDA/ODCS G-9

Enclosures

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

September 27, 2024

SUBJECT: Early Coordination 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

Ms. Sunshine Thomas-Bear, THPO
Winnebago Tribe of Nebraska
PO Box 687
Winnebago, NE 68071

Dear Ms. Thomas-Bear:

The U.S. Army (Army) is initiating early coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject Environmental Impact Statement (EIS). The Army will prepare the EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500– 1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132- acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois through transfer to the Jo- Carroll Depot Local Redevelopment Authority (LRA) and (2) the potential effects of the LRA's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 environmental impact statement (EIS) evaluated the closure, and the Depot was officially closed in 2000. The subject EIS will tier from the 1997 EIS. In 2000, the *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* (2000 SVADA PA) (Enclosure 2, Programmatic Agreement) was executed in support of the 1997 EIS to ensure adequate consideration of the effect of the closure and disposal on historic properties.

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Winnebago Tribe of Nebraska
PO Box 687
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Appendix G4. February 2025 Coordination and Consultation

Enclosures are provided only for the first letter.

Responses received follow the letter sent.

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

February 26, 2025

SUBJECT: Additional Coordination regarding Cultural Resources 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

REFERENCE: SHPO Log #005022420

Ms. Carol (CJ) Wallace, Cultural Resource Coordinator
Illinois Department of Natural Resources
Attn: State Historic Preservation Office
1 Natural Resources Way
Springfield, IL 62702

Dear Ms. Wallace:

The U.S. Army (Army) is initiating additional coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject environmental impact statement (EIS). The Army will prepare the EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) or other appropriate recipient and (2) the potential effects of the LRA's or other recipient's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 EIS evaluated the closure, and the Depot was officially closed in 2000. Also in 2000, the *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* (2000 SVADA PA) (Enclosure 2, Programmatic Agreement) was executed in support of the 1997 EIS to ensure adequate consideration of the effect of the closure and disposal on historic properties.

The Army originally initiated consultation with your office for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in November 2023 for the EA. Following completion of the draft EA, the Department of the Army Headquarters determined an EIS was required. The Army sent your agency an early coordination letter for the EIS in August 2024. Based on agency responses received during the EA scoping process and early coordination for the EIS, the Army also expanded the area

of potential effects (APE) to include cultural resources and historic properties outside the parcel that could be impacted by the LRA's proposed reuse alternative.

At this time, the Army is initiating additional coordination with you for the EIS to request any comments you might have in addition to those you provided in your previous correspondence. The project remains unchanged from the description presented for the 2023 and 2024 coordination. The remainder of this letter provides information on the project location, the proposed action, alternatives, and potential affected cultural resources.

The 132-acre parcel is undeveloped land in Carroll County, IL (Enclosure 3, Site Map, and Enclosure 4, Topographic Map). The parcel includes Commander's Pond (formerly known as Ordnance School Lake). The parcel is bordered on the east and south by the Apple River, a tributary of the Mississippi River; the Mississippi River on the southwest; Vincent Road and Rofsteck Road on the west; and Crim Road on the north. While these rivers and roads form the boundaries of the parcel, they are not part of it. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by the 132-acre parcel, also is not part of the parcel to be transferred.

Since 2000, through the BRAC process, former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980. The Army has transferred these parcels to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources (DNR), and the LRA. The Army has already transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west-northwest.

In 2016, USFWS withdrew its interest in the 132-acre parcel of land (formerly known as Parcel FWS 5) at the southeastern end of SVADA. The Army officially identified the parcel as surplus in January 2018. The Army's proposed action is disposal of the parcel, which has been redesignated LRA Parcel 20, and transferring the property to the LRA. The Army has completed the following remediation at four contaminated cleanup sites on LRA Parcel 20:

- Site 20, Abandoned Landfill: Capped the landfill with "hot spot" removal (i.e., excavated soil containing chemicals of concern at concentrations above recreational remediation goals and buried drums and debris); transported the contaminated soil, drums, and debris to a regulated, licensed solid waste landfill for disposal; conducted site restoration; conducting long-term monitoring of groundwater and surface water; maintaining the engineered landfill cap; implemented land use controls (LUCs) that restrict site access, prohibit residential agricultural land use, and prevent intrusive activities; and will conduct further per- and polyfluoroalkyl substances investigations.
- Site 73, Stables Landfill: Conducted surface debris removal, soil excavation, and off-site disposal.
- Site 130, Vincent Road Septic System: Conducted a human health risk assessment that evaluated potential adverse health effects to communities likely to use the area based on the proposed industrial/commercial and recreational development plan. The human health risks

were determined to be acceptable for receptors and specified land uses and the preferred remedy was No Further Action.

- Site 178, Ordnance School Lake: Conducted soil and sediment excavation, off-site disposal, and implemented LUCs to prevent the site from being used for purposes other than industrial/ commercial and recreational.

The LRA's finalized 2023 reuse plan for LRA Parcel 20 and additional information regarding the disposal and reuse of the parcel is available at Base Realignment and Closure (BRAC) > Great Lakes and Ohio River Division > Programs. In its plan, the LRA presents a conceptual reuse alternative to be implemented in three phases for developing LRA Parcel 20, which focuses on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development under each phase. To facilitate implementation, the LRA would implement the phases sequentially.

Phase 1 could be implemented within a target 5-year completion window, while phases 2 and 3 could follow, with both having 5-year-plus completion windows. The LRA's proposed reuse includes activities outside the boundary of LRA Parcel 20 in the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island. All of the LRA's reuse phases would require dredging.

In addition to the LRA's proposed reuse alternative, the EIS also will evaluate a recreation-only reuse alternative and a recreation and solar reuse alternative, which involve only the elements described in the LRA's 2023 reuse plan.

If any sites are determined to be eligible for listing in the National Register of Historic Places (NRHP) through additional archaeological testing within LRA Parcel 20, cultural resources encumbrances in the form of preservation covenant will apply in perpetuity, as appropriate, based on the 2000 SVADA PA and in consultation with the Illinois State Historic Preservation Office (SHPO) under Section 106 of the NHPA. See the preservation covenant in Enclosure 5.

The 2000 SVADA PA is still in effect. A complete Phase I archaeological survey of LRA Parcel 20 was conducted by Brockington Associates (Brockington) in 2020. LRA Parcel 20 has no known buildings, structures, or traditional cultural properties currently listed in the NRHP. Two archaeological sites within LRA Parcel 20 (sites 11-CA-1 and 11-CA-142) are identified as potentially eligible for listing in the NRHP, and a third site (Site 11-CA-194) is not eligible (Enclosure 6, Archaeological Sites Map; Enclosure 7, Summary of Archaeological Sites Table). Brockington provided the survey report to the Illinois SHPO on November 4, 2020. The SHPO responded in a letter dated December 24, 2020, that the project as proposed would have no adverse effect on the two potentially eligible sites and that Site 11-CA-194 is not eligible for listing in the NRHP, but that any plan modifications must include SHPO notification (Enclosure 8, SHPO letter dated December 24, 2020). Brockington finalized the *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois* in January 2021. In the finalized report, Brockington stated the portions of sites 11-CA-1 and 11-CA-142 located within LRA Parcel 20 were not NRHP-eligible, and, therefore, the disposal of the parcel would result in no adverse effects on any cultural resources. The authors noted that a complete eligibility statement for each site could not be made, however, because the Brockington survey remained within the bounds of LRA Parcel 20 and did not survey the portions of each site located outside the parcel.

In response to the LRA's 2023 reuse plan for LRA Parcel 20 and subsequent agency scoping comments on the upcoming EIS, the Army has included four additional potentially eligible archaeological sites (11-CA-44, 11-CA-143, 11-CA-147, and 11-CA-148) and one unassessed archaeological site (11-CA-60) outside LRA Parcel 20 as cultural resources that could be indirectly impacted by the Army's disposal of LRA Parcel 20 (Enclosure 6; Enclosure 7). While there are other cultural resources present within the APE for the proposed project, these resources were not included in the report because the Illinois SHPO determined the resources to be ineligible for the NRHP. The Army will include Site 11-CA-60 in the EIS, despite the Illinois SHPO having not assessed its eligibility, out of extreme caution relating to the potential effects of the proposed action on cultural resources. In addition, Site 11-CA-44, a Late Woodland mound and town site, is protected under the Illinois Human Remains Protection Act (Chapter 20 Illinois Compiled Statutes 3440). Sites 11-CA-44 and 11-CA-60 also are both located on land owned by USFWS that USACE has declared is Environmentally Sensitive due to the presence of archaeological resources.

The Army asks the Illinois SHPO to determine the effect the Army's disposal and LRA's subsequent reuse of LRA Parcel 20 would have on the seven archaeological sites discussed in this letter. The Army also asks for guidance from the Illinois SHPO regarding any additional survey or monitoring required for the preservation of the identified five cultural resources should the LRA implement their proposed alternative.

If you have input regarding resources of concern to your agency or any questions concerning this BRAC action, contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter. The Draft EIS will be available for public review and comment at Base Realignment and Closure (BRAC) > Great Lakes and Ohio River Division > Programs following its publication.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2025.02.26 13:10:23 -05'00'

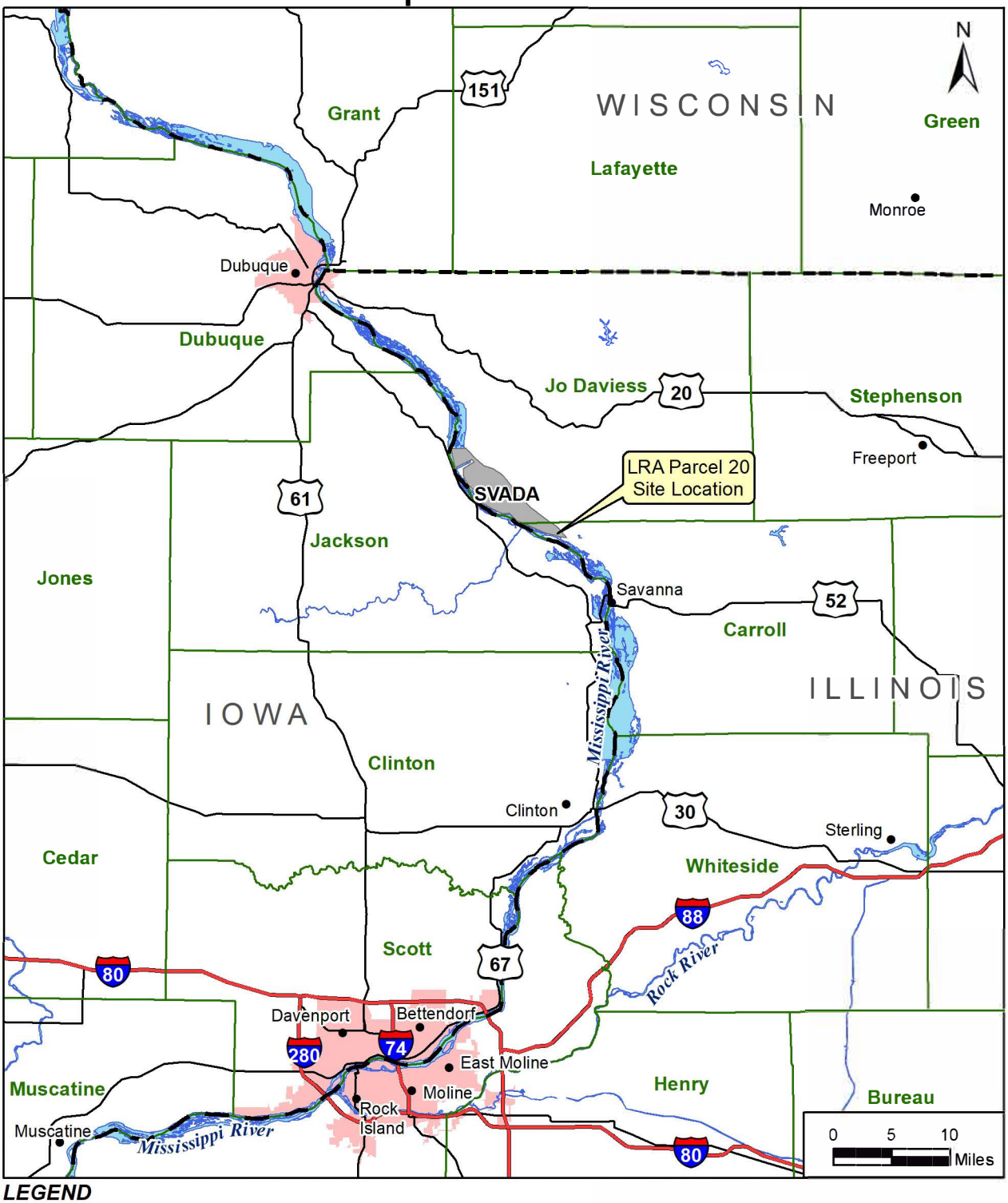
Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, SVADA, Base Environmental Coordinator
Mr. Travis Black, U.S. Department of Transportation, Maritime Administration, Director, Inland Waterways Gateway (St. Louis)
Mr. Ed Britton, USFWS, Upper Mississippi River National Wildlife and Fish Refuge, Savanna District Office
Ms. Jodi Creswell, USACE, Rock Island District, Chief, Environmental Planning Branch

Ms. Charlene Falco, Illinois Environmental Protection Agency, Project Manager, Federal Site Remediation Section, Bureau of Land
Ms. Nicole Goers, U.S. Environmental Protection Agency (USEPA) Region 5, Remedial Project Manager, Remedial Response Section 5
Mr. Bradley Hayes, Illinois DNR, Manager, Impact Assessment Section
Mr. Christopher Koeppel, Advisory Council on Historic Preservation, Assistant Director, Office of Federal Agency Programs, Federal Property Management Section
Ms. Kathy Kowal, USEPA Region 5, Lead NEPA Reviewer
Ms. Krystle McClain, USEPA Region 5, NEPA Program Supervisor
Mr. Kraig McPeek, USFWS Illinois-Iowa Ecological Services Field Office, Field Office Supervisor
Ms. Natalie Phelps Finnie, Illinois DNR, Director

Enclosure 1: Location Map



LEGEND

- State Boundary
- County Boundary
- Interstate Highway
- U.S. Route
- Urban Area
- Surface Water

Enclosure 2: Programmatic Agreement

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

August 2000

Whereas the United States Army (Army) is responsible for implementation of applicable provisions of the Defense Base Closure and Realignment Act of 1990 (P.L. 101-510) as amended, and is proceeding with the closure of Savanna Army Depot Activity (SVDA), and consequent disposal of excess and lus property in a manner consistent with the requirements of the applicable Defense Base Closure and Realignment Commission recommendation; and

Whereas the Army has determined that leasing, 1 ensing and/or disposal of all or portions of S'\,'DA, in Illinois, may have an effect upon historic properties that have been designated as eligible for listing in, the National Register of Historic Places, and has consulted with the Illinois State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation (Council) pursuant to 36 C.F.R. Part 800, regulations implementing Section 106 of the National Historic Preservation Act (16 U.S.C. Section 470(f), Section ll0(f) of the same Act (16 U.S.C. Section 470h-2[f]), and Section 111 of the same Act (16 U.S.C. Section 470h-3); and

Whereas after real estate screening activities were conducted it was determined that S\J'DA surplus lands will be divided between the U.S. Fish and Wildlife Service, the U.S. Army Corps of Engineers, the Illinois Department of Natural Resources, and the Jo Carroll Depot Local Reuse Authority; and

Whereas the Army will conduct cultural resource inventory activities only for those lands to be transferred to non-fede entities; and

Whereas the Army has completed a number of historic architectural and archeological surveys (listed in Attachment A) to support

disposal of portions of the BRAC property to non-federal entities; and

Whereas none of the SVDA buildings to be conveyed to non-federal entities, examined by the 1997 architectural inventory study, were determined to be eligible for the National Register of Historic Places; and

Whereas a number of archeological sites located within those SVDA BRAC excess lands scheduled for disposal to non-federal entities have been determined to be eligible or potentially eligible for the National Register of Historic Places (listed in Attachment B); and

Whereas not all BRAC lands to be disposed of to non-federal entities can be surveyed for archeological resources until the lands have been examined for and, if necessary, cleared of unexploded ordnance (UXO); and

Whereas interested members of the public, including the Jo Carroll Depot Local Redevelopment Authority, and Native Americans, have been provided opportunities to comment on the effects this base closure may have on historic properties at SVDA through public hearings, consultation meetings, and other means; and

Whereas in carrying out the disposal of excess and surplus property the Army will comply with all applicable laws and regulations, including 36 C.F.R. Part 79, Curation of Federally-Owned and Administered Archeological Collections;

Whereas the Jo Carroll Depot Local Redevelopment Authority has been invited to concur in this agreement document; and

NOW, THEREFORE, the Army, the SHPO, and the Council agree that the undertaking described above shall be implemented in accordance with the following stipulations to take into account the effect of the undertaking on historic properties.

STIPULATIONS - The Army will ensure that the following measures are carried out:

I. Identification and Evaluation

A. The Army will conduct Phase I archeological site location surveys for those SVDA lands that are to be transferred to non-federal entities and that have not been previously surveyed for archeological resources (Appendix C map

displays those SVDA lands that will be surveyed for archeological resources).

B. For lands that must be examined for potential UXO contamination, archeological surveys will be conducted only after the area has been examined for UXO and has been determined as being safe for subsurface archeological testing. Due to explosive ordnance qualification requirements and safety factors, no archeologists will be made part of the actual UXO field survey and disposal teams. However, archeologists associated with the UXO contractor and the U.S. Army Corps of Engineers (USACE) will be available for consultations and to examine any archeological finds that may be made in the course of the UXO investigations. The following procedures will be followed by the UXO disposal teams that will conduct the UXO surveys.

1. Prior to the initiation of field investigations at SVDA, UXO survey personnel will receive a cultural resources orientation concerning known cultural resource sites within the project area and recognition of cultural resource artifactual materials that could be encountered by the UXO investigations.

2. UXO surveys will involve location of metallic objects by metal detectors and hand excavation of these metallic objects by UXO disposal experts. Non UXO related metallic objects and any other cultural items encountered by the investigators will be left on the ground surface adjacent to the hole from which they were removed for later examination and, if appropriate, collection during subsequent archeological surveys.

3. UXO field survey personnel will notify the SVDA BRAC Environmental Coordinator (BEC) and the contract or USACE archeologist of any cultural materials or human skeletal materials encountered during the UXO investigations. If human skeletal remains are encountered, UXO investigations will be immediately halted for that sampling grid and the SVDA BEC and USACE archeologist will make arrangements to determine the origin of the human remains and whether the requirements of the Native American Graves Protection and Repatriation Act (NAGPRA) should be enacted.

4. UXO related items encountered by the UXO disposal experts may be removed from the location where they are encountered for disposal or may be exploded *in situ*, if removal is considered to be too hazardous.

C. The Army will coordinate the findings and recommendations for all SVDA archeological surveys with the Illinois SHPO as the survey reports are completed.

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.

III. Licenses and Leases

Licenses or leases, to other than federal agencies, of historic properties will include language provided in Attachment D of this agreement as appropriate.

IV. Disposal of SVDA Properties

A. Transfer of Real Property That Does Not Contain Historic Properties

In leasing or disposing of real property and improvements--for which identification and evaluation have been completed in consultation with the SHPO--that do not contain historic properties, any portion of an historic property, archeological sites, or any portion of an archeological site, no further action is necessary under this agreement. The Army will, however, promptly notify the SHPO that such a transfer has been completed.

B. Assignments to Other Federal Agencies

In assigning historic property (ies) directly to another Federal agency by a transfer authority such as The Federal Property and Administrative Services Act of 1949, as amended (40 U.S.C. § 471 et seq.), the receiving Federal agency will be deemed responsible for compliance with 36 C.F.R. Part 800 and any other applicable state or Federal laws and regulations with respect to the maintenance and disposal of these properties. The Army will promptly notify the SHPO and Council in writing of each Federal agency that has requested and been assigned such property.

C. Public Benefit Conveyances to Non-Federal Recipients

In disposing of historic property(ies) directly to a non-Federal recipient - at the request of a sponsoring Federal agency, and pursuant to the Public Benefit Conveyance authorities contained in the Federal Property and Administrative Services Act of 1949, as amended (40 U.S.C. § 471 et seq.), and other applicable authorities - an appropriate preservation covenant (found at Attachment E) will be incorporated in the transfer instrument(s). The Army will promptly notify the SHPO and Council in writing of each such transfer of an archeological-site property.

D. Economic Development Conveyances to LRAs

In disposing of historic property(ies) to a Local Redevelopment Authority (LRA) pursuant to the Economic Development Conveyance authority contained in the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510, as amended), an appropriate preservation covenant (found at Attachment E) will be incorporated in the transfer instrument(s). The Army will promptly notify the SHPO and Council in writing of each such transfer of an archeological-site property.

E. Competitive Sales

In disposing of historic properties via a competitive sale transfer authority, the Army's bid solicitation will contain the following information:

(1) Information on the property's archeological significance, identifying elements, or other characteristics of the property that should be given special consideration in planning;

(2) Information on financial incentives for preservation of archeological properties;

(3) Information indicating that an appropriate preservation covenant will be incorporated in the instrument transferring title to the property, and that this covenant will be substantively identical to the one contained in Attachment E of this agreement (as appropriate), unless modifications are authorized pursuant to the process described in paragraph IV. G, below, and as required to accord the covenants with state law.

In developing the above information for inclusion in its initial bid solicitation document, the Army will solicit the advice and

assistance of the SHPO. The Army need not solicit such advice and assistance in preparing subsequent solicitation documents, unless such documents contain historic properties information that materially differs from that included in the initial solicitation document. The Army will notify the SHPO and Council in writing of each such transfer of an archeological-site property.

F. Negotiated Sales

In disposing of historic properties via a negotiated sale transfer authority, the Army will provide a written document ("negotiation document") to the negotiating party that sets forth the same information described in subparagraphs IV. E (1), (2) & (3), above. In developing this information for inclusion in the negotiation document to be provided to the initial negotiating party, the Army will solicit the advice and assistance of the SHPO. The Army need not solicit such advice and assistance in preparing negotiation documents for subsequent negotiating parties, unless such documents contain historic properties information that materially differs from that included in the document provided to the initial negotiating party. The Army will notify the SHPO and Council in writing of each such transfer of an archeological-site property.

G. Covenant Modification to Facilitate Transfer

If the Army cannot transfer the property or properties that contain National Register eligible archeological sites pursuant to the provisions set forth in paragraphs IV. C, D, E, and F above, then the Army will consult with the SHPO, the Council, and (with respect to transfers pursuant to paragraphs IV. C, D, and F) the prospective transferee(s) to determine appropriate modifications to the preservation covenant contained in Attachment E that are necessary in order to complete transfer of the property(ies) within established disposal timelines. Such modifications shall be limited to those that are reasonably necessary in order to effect transfer of, or effectively market, the concerned property within established timelines.

V. Environmental Remediation

A. UXO identification and removal will be handled as described in Stipulation I.B of this agreement document. As they are developed, the plans for other proposed environmental remediation activities will be reviewed by the SVDA BRAC Environmental Coordinator (BEC) to identify any effects to historic properties, known or yet to be discovered. If the Army determines that a proposed remediation activity will take place

less than 100 feet from a historic property and has the potential to affect that property, the Army will consult with the SHPO to determine what steps, if any, should be taken with respect to those effects.

B. Proposed remediation plans that the Army determines may affect historic properties will be submitted to the SHPO for review and comment in accordance with the following procedures:

(1) Proposed remediation plans or supplemental documentation furnished by the Army will provide descriptions of any potential conflicts between remediation and preservation of historic properties;

(2) In situations where the Army determines that there is an immediate threat to human health, safety, or the environment, and that remediation must proceed without first taking steps to preserve historic properties, then the Army's reasons for so determining will be fully described;

(3) In situations where the Army determines that there is not an immediate threat to human health, safety, or the environment, and that implementation of its proposed remediation plan will result in the destruction or substantial alteration of any historic property, then the Army shall either modify its remediation plan to avoid the adverse effect or implement data recovery and/or recordation in consultation with the SHPO, taking into account health and safety constraints inherent in properties containing hazardous materials, resource availability, and any other relevant constraints.

VI. Anti-Deficiency Act

The stipulations of this agreement are subject to the provisions of the Anti-Deficiency Act. If compliance with the Anti-Deficiency Act alters or impairs the Army's ability to implement the stipulations of this agreement, the Army will consult in accordance with the amendment and termination procedures found at Sections IX. and X. of this agreement.

VII. Status Reports

Until such time as all SVDA archeological properties have been transferred from Army control in accordance with the terms of this agreement, the Army will provide an annual status report

to the Council and Illinois SHPO to review implementation of the terms of this agreement and to determine whether amendments are needed. If amendments are needed, the signatories to this agreement will consult, in accordance with Stipulation IX. of this agreement, to make such revisions.

VIII. Dispute Resolution

A. Should the Illinois SHPO and/or the Council object within thirty (30) days to any plans or other documents provided by the Army or others for review pursuant to this agreement, or to any actions proposed or initiated by the Army pursuant to this agreement, the Army shall consult with the objecting party to resolve the objection. If the Army determines that the objection cannot be resolved, the Army shall forward all documentation relevant to the dispute to the Council. Within thirty (30) days after receipt of all pertinent documentation, the Council will either:

(1) Provide the Army with recommendations, which the Army will take into account in reaching a final decision regarding the dispute; or

(2) Notify the Army that it will comment pursuant to 36 C.F.R. 800.7(c), and proceed to comment.

Any Council comment will be taken into account by the Army in accordance with 36 C.F.R. 800.7(c)(4) with reference to the subject of the dispute.

B. Any recommendations or comment provided by the Council pursuant to Stipulation VIII. A above will pertain only to the subject of the dispute; the Army's responsibility to carry out all other actions under this agreement that are not the subjects of the dispute will remain unchanged.

C. At any time during implementation of the measures stipulated in this agreement by the Army, if an objection to any such measure or its manner of implementation is raised by interested persons, then the Army shall consider the objection and consult, as appropriate, with the objecting party, the SHPO, and the Council to attempt to resolve the objection.

IX. Amendments

A. The Army, Illnois SHPO, and/or Council may request that this PA be revised, whereby the parties will consult to consider whether such revision is necessary.

B. If it is determined that revisions to this PA are necessary, then the Army, the Council, and the SHPO shall consult pursuant to 36 C.F.R. 800.6(c)(7), as appropriate, to make such revisions. Except that, reviewing parties must comment on, or signify their acceptance of, the proposed changes to the PA in writing within 30 days of their receipt.

X. Termination of Agreement

A. The Army, Illnois SHPO, and/or Council may terminate this PA by providing thirty (30) days written notice to the other signatory parties. During the period after notification and prior to termination the Army, the Council, and the SHPO will consult to seek agreement on amendments or other actions that would avoid termination. In the event of termination, the Army will comply with 36 CFR Part 800.6(c)(8) with regard to individual undertakings associated with the BRAC disposal action.

Execution and implementation of this PA evidences that the Army has afforded the Council a reasonable opportunity to comment on the closure and disposal of excess and surplus property at SVDA, and that the Army has taken into account the effects of the undertaking on historic properties. Execution and compliance with this programmatic agreement fulfills the Army's Section 106 responsibilities regarding the closure and disposal of Savanna Army Depot Activity.

DEPARTMENT OF THE ARMY

By: Charles S. Mahan Jr. Date: 21 August 2000
Charles S. Mahan, Jr.
Major General, USA
Chief of Staff

ILLINOIS STATE HISTORIC PRESERVATION OFFICER

By: _____ Date: 9-20-00
Anne Haaker
Deputy State Historic Preservation Officer

ADVISORY COUNCIL ON HISTORIC PRESERVATION

By: John M. Fowler Date: 10/13/00
John Fowler
Executive Director

Concur:

JO CARROLL DEPOT LOCAL REDEVELOPMENT AUTHORITY

By: _____ Date: 9-25-00
John A. Morehead
Executive Director

ATTACHMENT A

Bibliography of Cultural Resource Studies Conducted to Support BRAC Disposal of Savanna Army Depot Activity Properties

Ball, Donald B.
1997 *A Cultural Resources Reconnaissance of A Proposed 164 Acre Prison Site, Savanna Army Depot Activity, Jo Daviess County, Illinois*. Report prepared by the U.S. Army Corps of Engineers, Louisville District.

Hardlines
1997 *Architectural Inventory of a Portion of the Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois*. A report prepared for the U.S. Army Corps of Engineers, Louisville District by Hardlines: Design and Delineation, a subcontractor of International Technology, Inc.

Miller, Orloff G., Sarah Adams, and E. Jeanne Harris
1999 *Phase I Archaeological Survey of ca. 212 Acres (85.8 hectares) at the Savanna Army Depot Activity, Carroll County Illinois*. A report prepared for the U.S. Army Corps of Engineers, Louisville District by Gray and Pape, Inc.

Whitman, Linda G. and Nathan Young
1998 *Phase I Literature Review and Archaeological Cultural Resource Survey of 210 Acres (85 ha) at Savanna Army Depot Activity, Carroll County, Illinois*. A report prepared for the U.S. Army Corps of Engineers, Louisville District by ASC Group, Inc., a subcontractor of the IT Corporation.

ATTACHMENT B

Savanna Army Depot Activity, Illinois
Known Historic Properties on or Eligible for
the National Register of Historic Places
that will be Disposed of to Non-Federal Entities

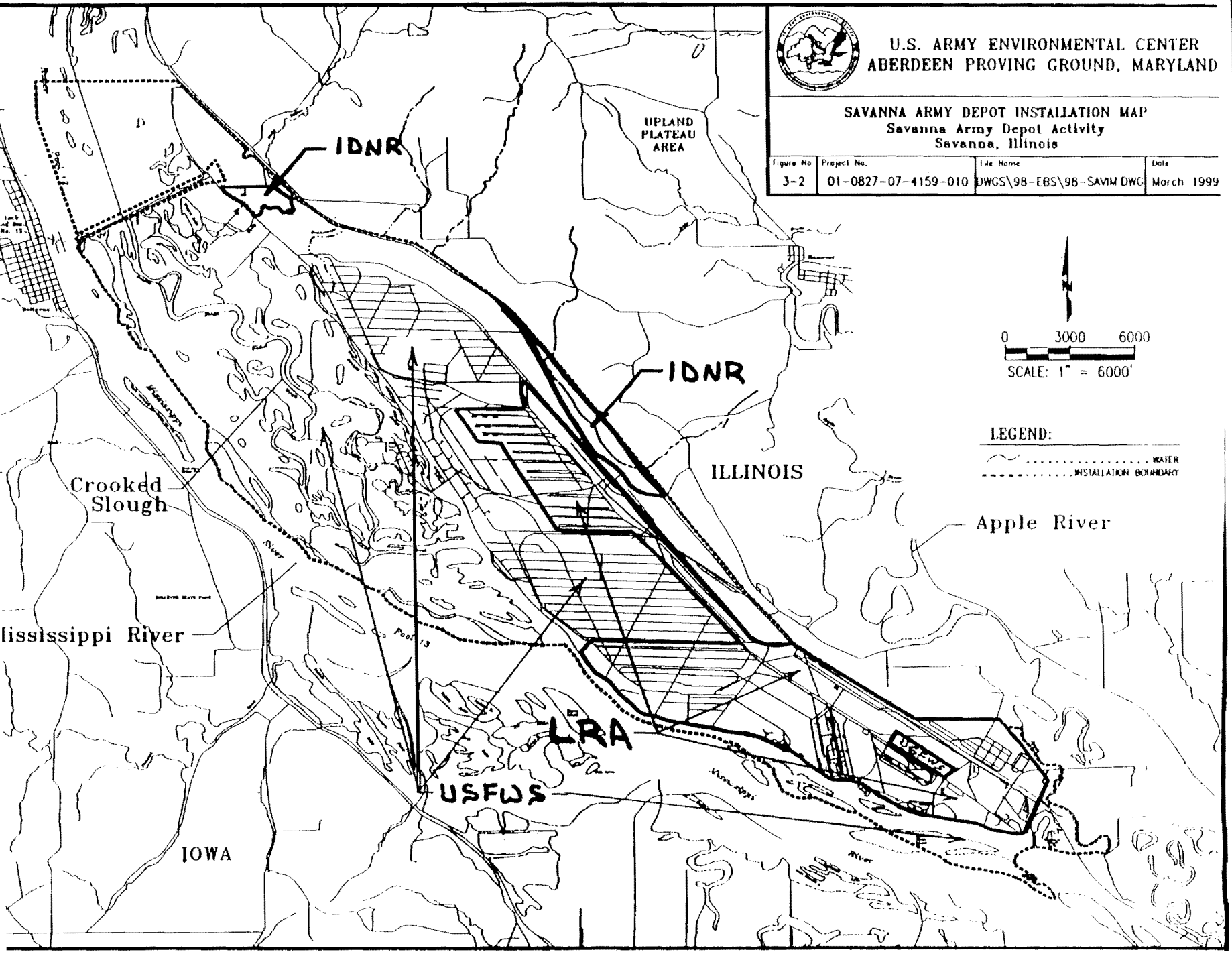
11CA1*
11CA2
11CA3+
11CA139*
11CA142
11CA143*
11CA147
11CA148
11CA149

* Lands making up this archeological site lie within two BRAC disposal parcels, one to be acquired by the local reuse authority and the other by the U.S. Fish and Wildlife Service.

+ The mounds formerly associated with this site have been destroyed, but the site may still have the potential to possess subsurface burials.

ATTACHMMENT C

Map Displaying the Location of
Savanna Army Depot Activity Lands to be
Transferred to Federal and
Non-Federal Entities


U.S. ARMY ENVIRONMENTAL CENTER
ABERDEEN PROVING GROUND, MARYLAND
SAVANNA ARMY DEPOT INSTALLATION MAP
Savanna Army Depot Activity
Savanna, Illinois
Figure No 3-2
Project No. 01-0827-07-4159-010
File Name DWGS\98-EBS\98-SAVIM.DWG
Date March 1999
IDNR
UPLAND PLATEAU AREA
IDNR
ILLINOIS
Crooked Slough
Apple River
lississippi River
Pool 13
LRA
USFWS
IOWA
0 3000 6000
SCALE: 1" = 6000'
LEGEND:
WATER
INSTALLATION BOUNDARY

ATTACHMENT D - **Language to be included in lease and license agreements when archeological sites are present.**

Archeological Property(ies) Lessee (License) Language

Archeological property(ies)XXX is/are (eligible for inclusion in/listed in) the National Register of Historic Places. The Lessee (Licensee) shall ensure that the property(ies) remain(s) undisturbed. The Lessee (Licensee) will notify the Army of any proposed ground disturbance to the archeological property prior to undertaking said ground disturbance. Notification will include a detailed description of the proposed undertaking. If the Army does not object to the proposal within 30 days of receipt of such notification and adequate supporting documentation, the Army will, with the assistance of the Lessee (Licensee), initiate consultation with the Illinois SHPO in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, "Protection of Historic Properties" (36 C.F.R. Part 800). The Lessee (Licensee) will not undertake the proposed action until the Army notifies the Lessee (Licensee) that the requirements of Section 106 have been fulfilled and the Lessee (Licensee) may proceed. If the Army objects to the Lessee's (Licensee's) proposed ground disturbance, the Lessee shall not undertake the proposed action.

ATTACHMENT E: STANDARD PRESERVATION COVENANT FOR CONVEYANCE OF PROPERTY THAT INCLUDES ARCHEOLOGICAL SITES

1. In consideration of the conveyance of the real property that includes the [official number(s) designation of archeological site(s)] located in the County of [name of county], Illinois, which is more fully described as [insert legal description], [Name of property recipient] hereby covenants on behalf of [himself/herself/itself], [his/her/its] heirs, successors, and assigns at all times to the Illinois State Historic Preservation Officer (SHPO), to maintain and preserve [official number(s) designation of archeological site(s)], in accordance with the provisions of paragraphs 2 through 11 of this covenant.

2. (Name of property recipient) will notify the Illinois SHPO in writing prior to undertaking any disturbance of the ground surface or any other action on [official number(s) designation of archeological site(s)] that would affect the physical integrity of this/these site(s). Such notice shall describe in reasonable detail the proposed undertaking and its expected effect on the physical integrity of [official number(s) designation of archeological site(s)].

3. Within thirty (30) calendar days of the Illinois SHPO's receipt of notification provided by (name of property recipient) pursuant to paragraph 2 of this covenant, the SHPO will respond to (name of property recipient) in writing as follows:

(a) That (name of property recipient) may proceed with the proposed undertaking without further consultation; or

(b) That (name of property recipient) must initiate and complete consultation with the Illinois SHPO before (he/she/it) can proceed with the proposed undertaking.

If the Illinois SHPO fails to respond to the (name of property recipient)'s written notice within thirty (30) calendar days of the SHPO's receipt of the same, then (name of property recipient) may proceed with the proposed undertaking without further consultation with the SHPO.

4. If the response provided to (name of property recipient) by the Illinois SHPO pursuant to paragraph 3 of this covenant requires consultation with the SHPO, then both parties will so consult in good faith to arrive at mutually-agreeable and appropriate measures that (name of property recipient) will employ to mitigate any adverse effects associated with the proposed undertaking. If the parties are unable to arrive at such mutually-agreeable mitigation measures, then (name of property recipient) shall, at a minimum, undertake recordation

for the concerned property--in accordance with the Secretary of Interior's standards for recordation and any applicable state standards for recordation, or in accordance with such other standards to which the parties may mutually agree--prior to proceeding with the proposed undertaking. Pursuant to this covenant, any mitigation measures to which (name of property recipient) and the SHPO mutually agree, or any recordation that may be required, shall be carried out solely at the expense of (name of property recipient).

5. [Name of recipient] shall make every reasonable effort to prohibit any person from vandalizing or otherwise disturbing any archeological site determined by the Illinois SHPO to be eligible for inclusion in the National Register of Historic Places. Any such vandalization or disturbance shall be promptly reported to the Illinois SHPO.

6. The Illinois SHPO shall be permitted at all reasonable time to inspect [parcel designation] in order to ascertain its condition and to fulfill its responsibilities hereunder.

7. In the event of a violation of this covenant, and in addition to any remedy now or hereafter provided by law, the Illinois SHPO may, following reasonable notice to [name of recipient], institute suit to enjoin said violation or to require the restoration of any archeological site affected by such violation.

8. [Name of recipient] agrees that the Illinois SHPO may, at its discretion, after 30 days notice to [name of recipient], convey and assign all or part of its rights and responsibilities contained in this covenant to a third party.

9. This covenant is binding on [name of recipient], [his/her/its] heirs, successors, and assigns in perpetuity. Restrictions, stipulations, and covenants contained herein shall be inserted by [name of recipient] verbatim or by express reference in any deed or other legal instrument by which [he/she/it] divests [himself/herself/itself] of either the fee simple title or any other lesser estate in [parcel designation] or any part thereof.

10. The failure of the Illinois SHPO to exercise any right or remedy granted under this instrument shall not have the effect of waiving or limiting the exercise of any other right or remedy or the use of such right or remedy at any other time.

11. The covenant shall be a binding servitude upon the real property that includes [official number(s) designation of archeological site(s)] and shall be deemed to run with the land. Execution of this covenant shall constitute conclusive evidence

that [name of recipient] agrees to be bound by the foregoing conditions and restrictions and to perform the obligations herein set forth.

Enclosure 3: Site Map

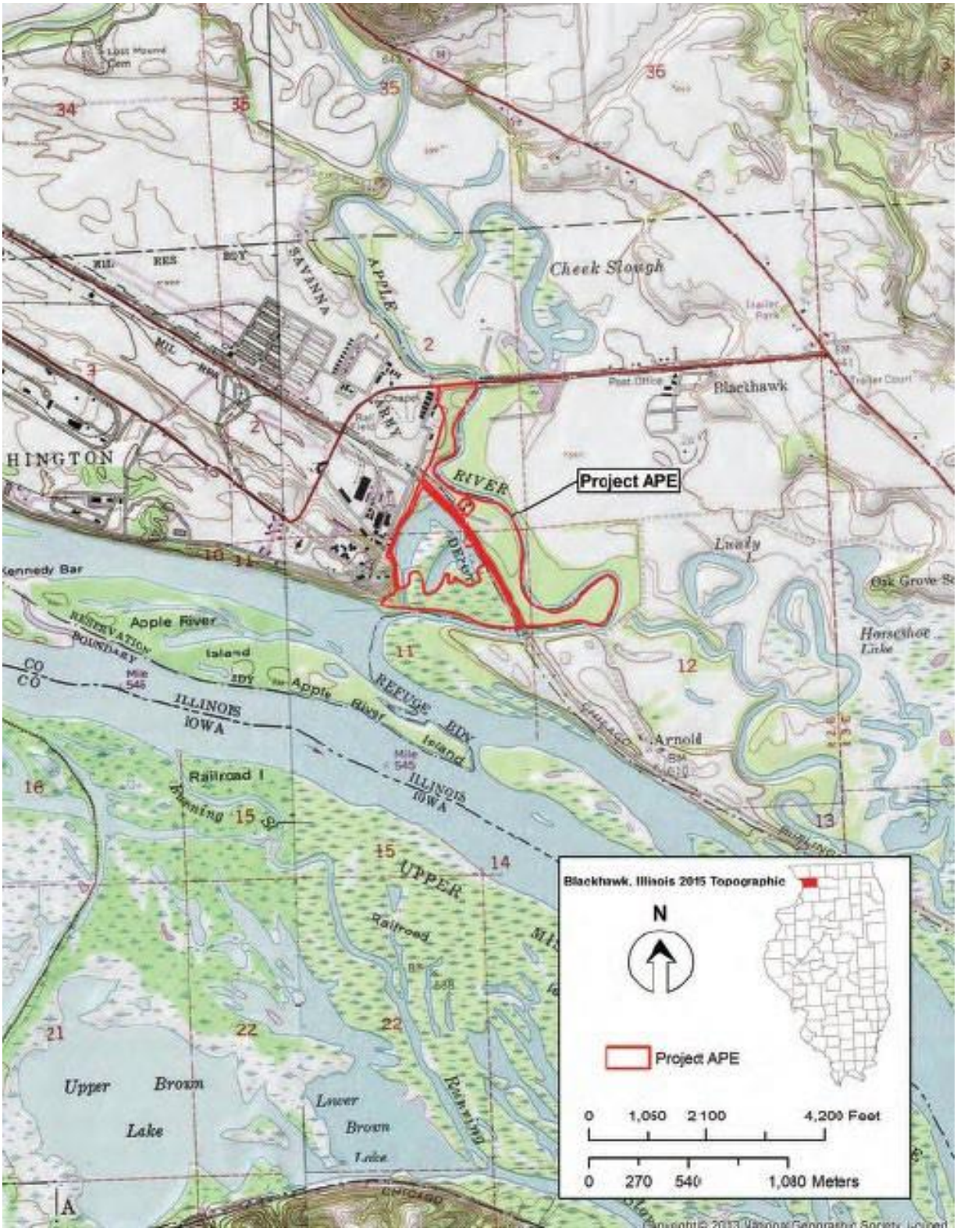


LEGEND

D Parcel Boundary

Note: Boundaries are approximate.

Enclosure 4: Topographic Map



Source: Brockington and Associates, Inc. 2021. *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois*. Brockington and Associates, Inc., Atlanta, GA.

Enclosure 5: Preservation Covenant

PRESERVATION COVENANT
SVADA LRA Parcel 20

(held by Illinois Department of Natural Resources)

In consideration of the conveyance of certain real property, hereinafter referred to as the

SVADA LRA Parcel 20, located in Carroll County, Illinois, which is more fully describes as:

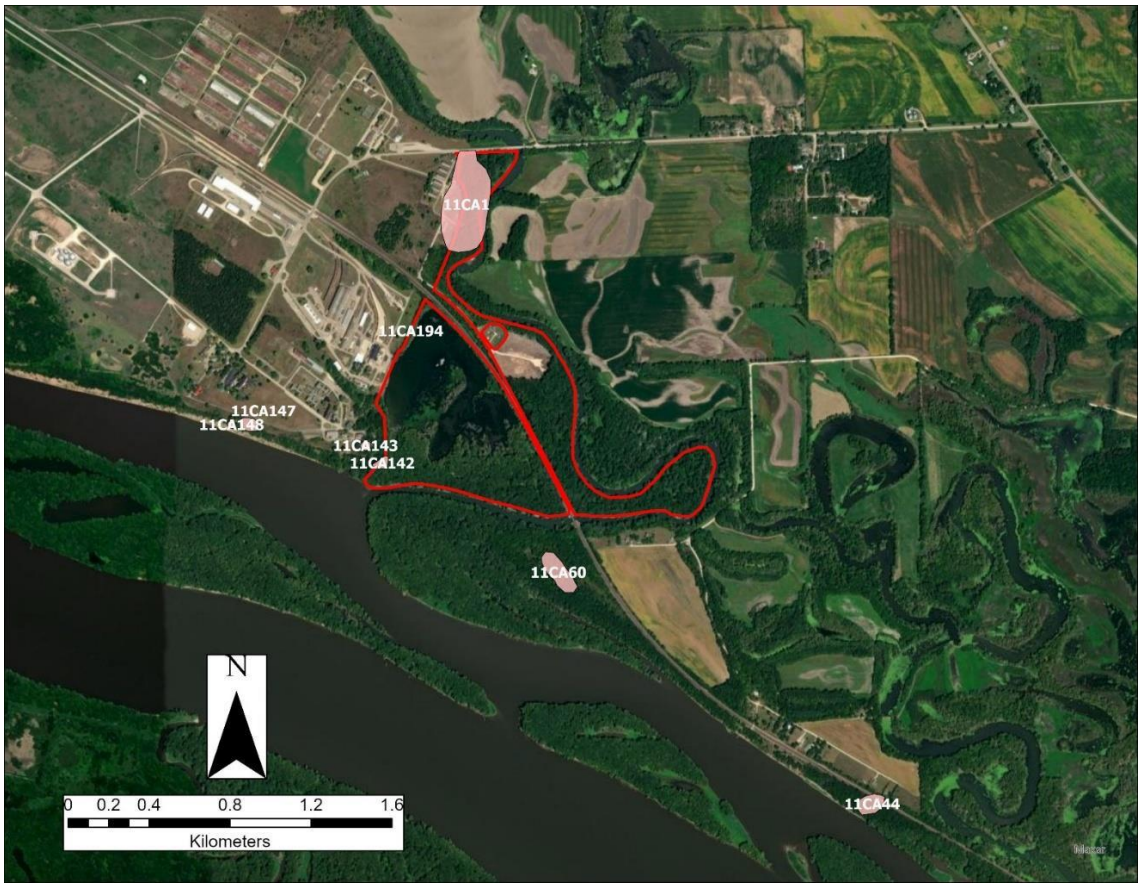
The Savanna Army Depot Activity (SVADA) local redevelopment authority (LRA) Parcel 20 at the southern end of SVADA in Carroll County, Illinois. The parcel is bounded by the Apple River to the east and south; the Mississippi River to the west; Vincent Road and Rofsteck Road to the northwest; and Crim Road to the north. The parcel is bisected from the northwest to the southeast by an active railroad line owned by the Burlington Northern Santa Fe Railway Company; the rail line is not part of the parcel to be transferred. A sewage treatment plant owned by the U.S. Army is surrounded by LRA Parcel 20, also is not part of the parcel to be transferred (Figure 1).

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.
3. Additional archaeological testing, NRHP site evaluations, and potential mitigation measures require additional Illinois SHPO consultation and Section 106 of the National Historic Preservation Act (NHPA) compliance measures, as required by law.
4. Execution of this Covenant shall include all applicable conditions, restrictions, laws, orders, and obligations set forth in the SVADA Programmatic Agreement (PA).
5. Conveyance of property that includes archaeological sites:
    a. In consideration of the conveyance of the real property, LRA Parcel 20, which includes the sites 11-CA-1 and 11-CA-142 located in Carroll County, Illinois. Jo-Carroll Depot LRA covenants on behalf of itself, its heirs, or successors, and assigns at all times to the Illinois SHPO to maintain and preserve sites 11-CA-1 and 11-CA-142, in accordance with the provisions of this Covenant.
    b. The property recipient will notify the Illinois SHPO in writing prior to any undertaking of any ground disturbance or action on sites that would affect the physical integrity of sites 11-CA-1 and 11-CA-142. Such a notice shall describe in reasonable detail the proposed undertaking and its expected effect on the physical integrity of sites 11-CA-1 and 11-CA-142.

c. Within thirty (30) calendar days of the Illinois SHPO's receipt of notification provided by the LRA, pursuant to this Covenant, the SHPO will respond to the LRA in writing as follows:
    i. That the LRA may proceed with the proposed undertaking without further consultation; or
    ii. That the LRA must initiate and complete additional consultation with the Illinois SHPO before it can proceed with the proposed undertaking; or
    iii. If the Illinois SHPO fails to respond to the LRA's written notice within thirty (30) calendar days of the SHPO's receipt of the same, then the LRA may proceed with the proposed undertaking without further consultation with the SHPO.
d. Lease and License:
    i. Archaeological sites 11-CA-1 and 11-CA-142 are potentially eligible for inclusion in the NRHP.
    ii. The Recipient/Lessee shall ensure that the sites remain undisturbed.
    iii. The Recipient/Lessee will notify the Owner of any proposed ground disturbance to the archaeological sites prior to undertaking said ground disturbance.
    iv. Notification will include a detailed description of the proposed undertaking.
    v. If the Army does not object to the proposal within thirty (30) calendar days of receipt of such notification and adequate supporting documentation, the Army will, with the assistance of the Lessee (Licensee), initiate consultation with Illinois SHPO in accordance with NHPA Section 106 and its implementing regulations, "Protection of Historic Properties" (Title 36of the Code of Federal Regulations Part 800).
    vi. The Recipient/Lessee will not undertake the proposed action until the Army notifies the Lessee (Licensee) that the requirements of Section 106 have been fulfilled and the Lessee (Licensee) may proceed.
    vii. If the Army objects to the Recipient's/Lessee's proposed ground disturbance, the Recipient/Lessee shall not undertake the proposed action.
e. The Illinois Department of Natural Resources shall be permitted at all reasonable times to inspect these archaeological sites to ascertain if the above conditions are being observed.
f. In the event of a violation of this Covenant, and in addition to any remedy now or hereafter provided by law, the Illinois Department of Natural Resources may, following reasonable notice to the Owner and Recipient/Lessee, institute suit to enjoin said violation or to require the restoration or mitigation of natural resources, archaeological sites, or structures disturbed by construction, alteration, or disturbance of the ground surface, or structure older than 50 years.
g. The Owner and Recipient/Lessee agrees that the Illinois Department of Natural Resources may at its discretion, without prior written notice to the Owner and Recipient/Lessee, convey and assign all or part of its rights and responsibilities contained herein to a third party.
h. This Covenant is binding on the Owner and Recipient/Lessee, and their successors and assignees in perpetuity. Restrictions, stipulations, and covenants contained herein shall be inserted by Owner and Recipient/Lessee verbatim or by express reference in any deed or other legal instrument by which it divests itself or either the fee simple title or any other lesser estate in this SVADA LRA Parcel 20 or any part thereof.
i. The failure of the Illinois Department of Natural Resources to exercise any right or remedy granted under this instrument shall not have the effect of waiving or limiting the exercise of any other right or remedy or the use of such right or remedy at any other time.

Enclosure 6: Archaeological Sites Directly and Indirectly Effected by the Army's Disposal of LRA Parcel 20



Enclosure 7: A Summary of the Archaeological Sites Directly And Indirectly Effected by the Army's Disposal of LRA Parcel 20

Site Number	Time Period	Site Type	NHPA Eligible	HRPA	Survey Date
11CA1	Mississippian with smaller Woodland and 19th-20th century components	Habitation	Potentially	No	1932, 1997, 1998, and 2020
11CA44	Late Woodland	Mounds and Town	Potentially	Yes	1974, 1989, and 1994
11CA60	Mississippian	Habitation	Not assessed	No	1974
11CA142	Woodland with smaller Mississippian and historic components	Habitation	Potentially	No	1998 and 2020
11CA143	Late Woodland	Habitation	Further review	No	1998
11CA147	Woodland	Habitation	Further review	No	1998
11CA148	Woodland	Habitation	Further review	No	1998

Enclosure 8: Illinois SHPO Phase I Review Letter, SHPO Log #005022420

ILLINOIS DEPARTMENT OF NATURAL RESOURCES

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

Carroll County
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

PLEASE REFER TO: SHPO Log #005022420

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

From: Webster, Rebecca
To: Hayes, Beverly; Cannella, Michelle
Cc: Bauer, Joshua; Prendergast, Eric; Devanie, Sierra
Subject: Summary of SVADA Meeting with IL SHPO
Date: Friday, April 11, 2025 8:56:00 AM
Attachments: image001.png
image003.png

Hello all,

I wanted to update you regarding the conversation I had with the IL SHPO's Office and provide a summary of our conversation for the official record (below). Mr. Kruchten confirmed many of the mitigation measures regarding archaeological resources we've been expecting and provided statements on when the SHPO's office would expect those measures to take place. The most important aspect of our discussion was that Mr. Kruchten officially determined Sites 11CA1 and 11CA142 as eligible for the National Register of Historic Places. Both sites had been previously listed as potentially eligible, which created some ambiguity regarding the 2000 Programmatic Agreement (PA). This means that we can definitively say that the transfer of LRA Parcel 20 will result in a preservation covenant being enacted according to the PA.

Thank you,
Rebecca

Rebecca J. Webster. PhD, RPA | Sci. Archaeologist III

Pronouns: she. her, hers

Mobile **+1(301) 957-1011** | Rebecca.webster@tetratech.com

Time Zone: Eastern (UTC -05.00)

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100 W. Innes St. | Salisbury, NC, 28144 | tetratech.com

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From: Kruchten, Jeff Jeff.Kruchten@Illinois.gov
Sent: Thursday, April 10, 2025 5:03 PM
To: Webster, Rebecca REBECCA.WEBSTER@tetratech.com
Cc: Devanie, Sierra SIERRA.DEVANIE@tetratech.com; Bauer, Joshua JOSHUA.BAUER@tetratech.com; Prendergast, Eric ERIC.PRENDERGAST@tetratech.com
Subject: RE: Meeting About the Savanna Army Depot Disposal of LRA Parcel 20

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

Hello Rebecca,

I appreciate the details you provided during your call and concur with all 4 points below regarding the Savanna Army Depot Disposal of LRA Parcel 20.

Take care,

Jeff Kruchten
Principal Archaeologist
Illinois Historic Preservation Office
Illinois Department of Natural Resources
One Natural Resources Way
Springfield, IL 62702
Office: (217) 785-1279
Mobile: (217) 761-0094

Interim revised guidelines for conducting archaeological work in Illinois are now available here.

From: Webster, Rebecca <REBECCA.WEBSTER@tetratech.com>
Sent: Thursday, April 10, 2025 2:47 PM
To: Kruchten, Jeff <Jeff.Kruchten@Illinois.gov>
Cc: Devanie, Sierra <SIERRA.DEVANIE@tetratech.com>; Bauer, Joshua <JOSHUA.BAUER@tetratech.com>; Prendergast, Eric <ERIC.PRENDERGAST@tetratech.com>
Subject: [External] RE: Meeting About the Savanna Army Depot Disposal of LRA Parcel 20

Hello Jeff,
Thank you again for taking the time to speak to me this afternoon. Our conversation provided so much clarity surrounding how we should move forward regarding recommendations in the SVADA Environmental Impact Statement.
I wanted to also include a summary of our conversation for both our official records and to ensure that you concur with the notes I took.

1. The SHPO's Office confirms that Sites 11CA1 and 11CA142 are eligible for the National Register of Historic Places (NRHP). The SHPO's Office's determination is based on the archaeological reports, site forms, and each sites' location in relation to the mouth of the Apple River.
2. There is a high probability of unrecorded archaeological and human remains during ground disturbing activities of 11CA1 and 11CA142. As a result, the SHPO's Office requires Phase III mitigation of both sites. The office would prefer the Phase III occur

before the Army's disposal of LRA Parcel 20; however, they would also permit mitigation efforts be postponed until after the land transfer, but before the LRA's development of the parcel.

3. The 2000 Programmatic Agreement Attachment B listed Sites 11CA1, 11CA2, 11CA3, 11CA139, 11CA142, 11CA143, 11CA147, 11CA148, and 11CA149 as eligible or listed resources with planned disposals to the LRA which would call for a preservation convent. In the intervening years, portions of or the entirety of some of these cultural resources (11CA1, 11CA2, 11CA142, 11CA143, 11CA148) have been transferred to the LRA without a preservation covenant being enacted. Statues within the *Illinois State Historic Preservation Act (20 ILCS 34.20*) will likely require the LRA review and consult with the SHPO's Office regarding these sites and any other affected sites (11CA60 and 11CA44) before development. The state law would likely trigger additional surveys because the land surrounding the mouth of the Apple River was a significant location for the cultural development of Woodland and Mississippian Indigenous populations in the region.
4. Due to proposed dredging and increased barge traffic, the USFWS has expressed concern for two archaeological sites (11CA44 and 11CA60) on USFWS lands. Site 11CA60 has not been evaluated for the NRHP. The SHPO's Office requires archaeological sites that have not been evaluated to undergo a Phase I survey. While the SHPO cannot require a survey of 11CA60 due to a lack of jurisdiction, the SHPO's Office would advocate for there being a complete Phase I of the site before development.

Please correct me if I misinterpreted any of our conversation.

Thank you again for your time and help,

Rebecca

Rebecca J. Webster. PhD, RPA | Sci. Archaeologist III

Pronouns: she. her, hers

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Time Zone: Eastern (UTC -05.00)

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

February 26, 2025

SUBJECT: Additional Coordination regarding Cultural Resources 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

Mr. Kraig McPeek, Field Office Supervisor
USFWS, Illinois-Iowa Ecological Services Field Office
1511 47th Ave.
Moline, IL 61265

Dear Mr. McPeek:

The U.S. Army (Army) is initiating additional coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject environmental impact statement (EIS). The Army will prepare the EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) or other appropriate recipient and (2) the potential effects of the LRA's or other recipient's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 EIS evaluated the closure, and the Depot was officially closed in 2000. Also in 2000, the *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* (2000 SVADA PA) (Enclosure 2, Programmatic Agreement) was executed in support of the 1997 EIS to ensure adequate consideration of the effect of the closure and disposal on historic properties.

The Army originally initiated consultation with your office for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in November 2023 for the EA. Following completion of the draft EA, the Department of the Army Headquarters determined an EIS was required. The Army sent your agency an early coordination letter for the EIS in August 2024. Based on agency responses received during the EA scoping process and early coordination for the EIS, the Army also expanded the area of potential effects (APE) to include cultural resources and historic properties outside the parcel that could be impacted by the LRA's proposed reuse alternative.

At this time, the Army is initiating additional coordination with you for the EIS to request any comments you might have in addition to those you provided in your previous correspondence. The project remains unchanged from the description presented for the 2023 and 2024 coordination. The remainder of this letter provides information on the project location, the proposed action, alternatives, and potential affected cultural resources.

The 132-acre parcel is undeveloped land in Carroll County, IL (Enclosure 3, Site Map, and Enclosure 4, Topographic Map). The parcel includes Commander's Pond (formerly known as Ordnance School Lake). The parcel is bordered on the east and south by the Apple River, a tributary of the Mississippi River; the Mississippi River on the southwest; Vincent Road and Rofsteck Road on the west; and Crim Road on the north. While these rivers and roads form the boundaries of the parcel, they are not part of it. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by the 132-acre parcel, also is not part of the parcel to be transferred.

Since 2000, through the BRAC process, former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980. The Army has transferred these parcels to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources (DNR), and the LRA. The Army has already transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west-northwest.

In 2016, USFWS withdrew its interest in the 132-acre parcel of land (formerly known as Parcel FWS 5) at the southeastern end of SVADA. The Army officially identified the parcel as surplus in January 2018. The Army's proposed action is disposal of the parcel, which has been redesignated LRA Parcel 20, and transferring the property to the LRA. The Army has completed the following remediation at four contaminated cleanup sites on LRA Parcel 20:

- Site 20, Abandoned Landfill: Capped the landfill with "hot spot" removal (i.e., excavated soil containing chemicals of concern at concentrations above recreational remediation goals and buried drums and debris); transported the contaminated soil, drums, and debris to a regulated, licensed solid waste landfill for disposal; conducted site restoration; conducting long-term monitoring of groundwater and surface water; maintaining the engineered landfill cap; implemented land use controls (LUCs) that restrict site access, prohibit residential agricultural land use, and prevent intrusive activities; and will conduct further per- and polyfluoroalkyl substances investigations.
- Site 73, Stables Landfill: Conducted surface debris removal, soil excavation, and off-site disposal.
- Site 130, Vincent Road Septic System: Conducted a human health risk assessment that evaluated potential adverse health effects to communities likely to use the area based on the proposed industrial/commercial and recreational development plan. The human health risks were determined to be acceptable for receptors and specified land uses and the preferred remedy was No Further Action.

- Site 178, Ordnance School Lake: Conducted soil and sediment excavation, off-site disposal, and implemented LUCs to prevent the site from being used for purposes other than industrial/ commercial and recreational.

The LRA's finalized 2023 reuse plan for LRA Parcel 20 and additional information regarding the disposal and reuse of the parcel is available at Base Realignment and Closure (BRAC) > Great Lakes and Ohio River Division > Programs. In its plan, the LRA presents a conceptual reuse alternative to be implemented in three phases for developing LRA Parcel 20, which focuses on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development under each phase. To facilitate implementation, the LRA would implement the phases sequentially.

Phase 1 could be implemented within a target 5-year completion window, while phases 2 and 3 could follow, with both having 5-year-plus completion windows. The LRA's proposed reuse includes activities outside the boundary of LRA Parcel 20 in the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island. All of the LRA's reuse phases would require dredging.

In addition to the LRA's proposed reuse alternative, the EIS also will evaluate a recreation-only reuse alternative and a recreation and solar reuse alternative, which involve only the elements described in the LRA's 2023 reuse plan.

If any sites are determined to be eligible for listing in the National Register of Historic Places (NRHP) through additional archaeological testing within LRA Parcel 20, cultural resources encumbrances in the form of preservation covenant will apply in perpetuity, as appropriate, based on the 2000 SVADA PA and in consultation with the Illinois State Historic Preservation Office (SHPO) under Section 106 of the NHPA. See the preservation covenant in Enclosure 5.

The 2000 SVADA PA is still in effect. A complete Phase I archaeological survey of LRA Parcel 20 was conducted by Brockington Associates (Brockington) in 2020. LRA Parcel 20 has no known buildings, structures, or traditional cultural properties currently listed in the NRHP. Two archaeological sites within LRA Parcel 20 (sites 11-CA-1 and 11-CA-142) are identified as potentially eligible for listing in the NRHP, and a third site (Site 11-CA-194) is not eligible (Enclosure 6, Archaeological Sites Map; Enclosure 7, Summary of Archaeological Sites Table). Brockington provided the survey report to the Illinois SHPO on November 4, 2020. The SHPO responded in a letter dated December 24, 2020, that the project as proposed would have no adverse effect on the two potentially eligible sites and that Site 11-CA-194 is not eligible for listing in the NRHP, but that any plan modifications must include SHPO notification (Enclosure 8, SHPO letter dated December 24, 2020). Brockington finalized the *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois* in January 2021. In the finalized report, Brockington stated the portions of sites 11-CA-1 and 11-CA-142 located within LRA Parcel 20 were not NRHP-eligible, and, therefore, the disposal of the parcel would result in no adverse effects on any cultural resources. The authors noted that a complete eligibility statement for each site could not be made, however, because the Brockington survey remained within the bounds of LRA Parcel 20 and did not survey the portions of each site located outside the parcel.

In response to the LRA's 2023 reuse plan for LRA Parcel 20 and subsequent agency scoping comments on the upcoming EIS, the Army has included four additional potentially eligible

archaeological sites (11-CA-44, 11-CA-143, 11-CA-147, and 11-CA-148) and one unassessed archaeological site (11-CA-60) outside LRA Parcel 20 as cultural resources that could be indirectly impacted by the Army's disposal of LRA Parcel 20 (Enclosure 6; Enclosure 7). While there are other cultural resources present within the APE for the proposed project, these resources were not included in the report because the Illinois SHPO determined the resources to be ineligible for the NRHP. The Army will include Site 11-CA-60 in the EIS, despite the Illinois SHPO having not assessed its eligibility, out of extreme caution relating to the potential effects of the proposed action on cultural resources. In addition, Site 11-CA-44, a Late Woodland mound and town site, is protected under the Illinois Human Remains Protection Act (Chapter 20 Illinois Compiled Statutes 3440). Sites 11-CA-44 and 11-CA-60 also are both located on land owned by USFWS that USACE has declared is Environmentally Sensitive due to the presence of archaeological resources.

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Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2025.02.26 13:10:23 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
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Mr. Travis Black, U.S. Department of Transportation, Maritime Administration, Director, Inland Waterways Gateway (St. Louis)
Mr. Ed Britton, USFWS, Upper Mississippi River National Wildlife and Fish Refuge, Savanna District Office
Ms. Jodi Creswell, USACE, Rock Island District, Chief, Environmental Planning Branch
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Ms. Krystle McClain, USEPA Region 5, NEPA Program Supervisor

Ms. Natalie Phelps Finnie, Illinois DNR, Director
Ms. Carol (CJ) Wallace, Illinois DNR, SHPO, Cultural Resources Coordinator

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

February 26, 2025

SUBJECT: Additional Coordination regarding Cultural Resources 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

Mr. Ed Britton, District Manager
USFWS, Upper Mississippi River National Wildlife and Fish Refuge, Savanna District Office
7071 Riverview Rd.
Thomson, IL 61285

Dear Mr. Britton:

The U.S. Army (Army) is initiating additional coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject environmental impact statement (EIS). The Army will prepare the EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) or other appropriate recipient and (2) the potential effects of the LRA's or other recipient's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 EIS evaluated the closure, and the Depot was officially closed in 2000. Also in 2000, the *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* (2000 SVADA PA) (Enclosure 2, Programmatic Agreement) was executed in support of the 1997 EIS to ensure adequate consideration of the effect of the closure and disposal on historic properties.

The Army originally initiated consultation with your office for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in November 2023 for the EA. Following completion of the draft EA, the Department of the Army Headquarters determined an EIS was required. The Army sent your agency an early coordination letter for the EIS in August 2024. Based on agency responses received during the EA scoping process and early coordination for the EIS, the Army also expanded the area of potential effects (APE) to include cultural resources and historic properties outside the parcel that could be impacted by the LRA's proposed reuse alternative.

At this time, the Army is initiating additional coordination with you for the EIS to request any comments you might have in addition to those you provided in your previous correspondence. The project remains unchanged from the description presented for the 2023 and 2024 coordination. The remainder of this letter provides information on the project location, the proposed action, alternatives, and potential affected cultural resources.

The 132-acre parcel is undeveloped land in Carroll County, IL (Enclosure 3, Site Map, and Enclosure 4, Topographic Map). The parcel includes Commander's Pond (formerly known as Ordnance School Lake). The parcel is bordered on the east and south by the Apple River, a tributary of the Mississippi River; the Mississippi River on the southwest; Vincent Road and Rofsteck Road on the west; and Crim Road on the north. While these rivers and roads form the boundaries of the parcel, they are not part of it. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by the 132-acre parcel, also is not part of the parcel to be transferred.

Since 2000, through the BRAC process, former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980. The Army has transferred these parcels to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources (DNR), and the LRA. The Army has already transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west-northwest.

In 2016, USFWS withdrew its interest in the 132-acre parcel of land (formerly known as Parcel FWS 5) at the southeastern end of SVADA. The Army officially identified the parcel as surplus in January 2018. The Army's proposed action is disposal of the parcel, which has been redesignated LRA Parcel 20, and transferring the property to the LRA. The Army has completed the following remediation at four contaminated cleanup sites on LRA Parcel 20:

- Site 20, Abandoned Landfill: Capped the landfill with "hot spot" removal (i.e., excavated soil containing chemicals of concern at concentrations above recreational remediation goals and buried drums and debris); transported the contaminated soil, drums, and debris to a regulated, licensed solid waste landfill for disposal; conducted site restoration; conducting long-term monitoring of groundwater and surface water; maintaining the engineered landfill cap; implemented land use controls (LUCs) that restrict site access, prohibit residential agricultural land use, and prevent intrusive activities; and will conduct further per- and polyfluoroalkyl substances investigations.
- Site 73, Stables Landfill: Conducted surface debris removal, soil excavation, and off-site disposal.
- Site 130, Vincent Road Septic System: Conducted a human health risk assessment that evaluated potential adverse health effects to communities likely to use the area based on the proposed industrial/commercial and recreational development plan. The human health risks were determined to be acceptable for receptors and specified land uses and the preferred remedy was No Further Action.
- Site 178, Ordnance School Lake: Conducted soil and sediment excavation, off-site disposal,

and implemented LUCs to prevent the site from being used for purposes other than industrial/ commercial and recreational.

The LRA's finalized 2023 reuse plan for LRA Parcel 20 and additional information regarding the disposal and reuse of the parcel is available at Base Realignment and Closure (BRAC) > Great Lakes and Ohio River Division > Programs. In its plan, the LRA presents a conceptual reuse alternative to be implemented in three phases for developing LRA Parcel 20, which focuses on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development under each phase. To facilitate implementation, the LRA would implement the phases sequentially.

Phase 1 could be implemented within a target 5-year completion window, while phases 2 and 3 could follow, with both having 5-year-plus completion windows. The LRA's proposed reuse includes activities outside the boundary of LRA Parcel 20 in the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island. All of the LRA's reuse phases would require dredging.

In addition to the LRA's proposed reuse alternative, the EIS also will evaluate a recreation-only reuse alternative and a recreation and solar reuse alternative, which involve only the elements described in the LRA's 2023 reuse plan.

If any sites are determined to be eligible for listing in the National Register of Historic Places (NRHP) through additional archaeological testing within LRA Parcel 20, cultural resources encumbrances in the form of preservation covenant will apply in perpetuity, as appropriate, based on the 2000 SVADA PA and in consultation with the Illinois State Historic Preservation Office (SHPO) under Section 106 of the NHPA. See the preservation covenant in Enclosure 5.

The 2000 SVADA PA is still in effect. A complete Phase I archaeological survey of LRA Parcel 20 was conducted by Brockington Associates (Brockington) in 2020. LRA Parcel 20 has no known buildings, structures, or traditional cultural properties currently listed in the NRHP. Two archaeological sites within LRA Parcel 20 (sites 11-CA-1 and 11-CA-142) are identified as potentially eligible for listing in the NRHP, and a third site (Site 11-CA-194) is not eligible (Enclosure 6, Archaeological Sites Map; Enclosure 7, Summary of Archaeological Sites Table). Brockington provided the survey report to the Illinois SHPO on November 4, 2020. The SHPO responded in a letter dated December 24, 2020, that the project as proposed would have no adverse effect on the two potentially eligible sites and that Site 11-CA-194 is not eligible for listing in the NRHP, but that any plan modifications must include SHPO notification (Enclosure 8, SHPO letter dated December 24, 2020). Brockington finalized the *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois* in January 2021. In the finalized report, Brockington stated the portions of sites 11-CA-1 and 11-CA-142 located within LRA Parcel 20 were not NRHP-eligible, and, therefore, the disposal of the parcel would result in no adverse effects on any cultural resources. The authors noted that a complete eligibility statement for each site could not be made, however, because the Brockington survey remained within the bounds of LRA Parcel 20 and did not survey the portions of each site located outside the parcel.

In response to the LRA's 2023 reuse plan for LRA Parcel 20 and subsequent agency scoping comments on the upcoming EIS, the Army has included four additional potentially eligible archaeological sites (11-CA-44, 11-CA-143, 11-CA-147, and 11-CA-148) and one unassessed

archaeological site (11-CA-60) outside LRA Parcel 20 as cultural resources that could be indirectly impacted by the Army's disposal of LRA Parcel 20 (Enclosure 6; Enclosure 7). While there are other cultural resources present within the APE for the proposed project, these resources were not included in the report because the Illinois SHPO determined the resources to be ineligible for the NRHP. The Army will include Site 11-CA-60 in the EIS, despite the Illinois SHPO having not assessed its eligibility, out of extreme caution relating to the potential effects of the proposed action on cultural resources. In addition, Site 11-CA-44, a Late Woodland mound and town site, is protected under the Illinois Human Remains Protection Act (Chapter 20 Illinois Compiled Statutes 3440). Sites 11-CA-44 and 11-CA-60 also are both located on land owned by USFWS that USACE has declared is Environmentally Sensitive due to the presence of archaeological resources.

If you have input regarding resources of concern to your agency or any questions concerning this BRAC action, contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter. The Draft EIS will be available for public review and comment at Base Realignment and Closure (BRAC) > Great Lakes and Ohio River Division > Programs following its publication.

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Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

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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
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.

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."

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.

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.

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.

Thank you for the opportunity to comment on this Cultural Resource EIS document. Please let me know if you need additional information.

Sincerely,

Ed Britton

Ed Britton
Savanna District Manager
Upper Mississippi River National Wildlife and Fish Refuge

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

February 26, 2025

SUBJECT: Additional Coordination regarding Cultural Resources 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

Ms. Jodi Creswell, Chief, Environmental Planning Branch
USACE, Rock Island District
1500 Rock Island Avenue
Rock Island, IL 61201

Dear Ms. Creswell:

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If you have input regarding resources of concern to your agency or any questions concerning this BRAC action, contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter. The Draft EIS will be available for public review and comment at Base Realignment and Closure (BRAC) > Great Lakes and Ohio River Division > Programs following its publication.

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Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

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Mr. Kraig McPeek, USFWS Illinois-Iowa Ecological Services Field Office, Field Office Supervisor

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DEPARTMENT OF THE ARMY
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WASHINGTON, DC 20310-0600

February 26, 2025

SUBJECT: Additional Coordination regarding Cultural Resources 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

Ms. Krystle McClain, NEPA Program Supervisor
U.S. EPA Region 5
77 W. Jackson Blvd.
Chicago, IL 60604

Dear Ms. McClain:

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The Army originally initiated consultation with your office for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in November 2023 for the EA. Following completion of the draft EA, the Department of the Army Headquarters determined an EIS was required. The Army sent your agency an early coordination letter for the EIS in August 2024. Based on agency responses received during the EA scoping process and early coordination for the EIS, the Army also expanded the area of potential effects (APE) to include cultural resources and historic properties outside the parcel that could be impacted by the LRA's proposed reuse alternative.

At this time, the Army is initiating additional coordination with you for the EIS to request any comments you might have in addition to those you provided in your previous correspondence. The project remains unchanged from the description presented for the 2023 and 2024 coordination. The remainder of this letter provides information on the project location, the proposed action, alternatives, and potential affected cultural resources.

The 132-acre parcel is undeveloped land in Carroll County, IL (Enclosure 3, Site Map, and Enclosure 4, Topographic Map). The parcel includes Commander's Pond (formerly known as Ordnance School Lake). The parcel is bordered on the east and south by the Apple River, a tributary of the Mississippi River; the Mississippi River on the southwest; Vincent Road and Rofsteck Road on the west; and Crim Road on the north. While these rivers and roads form the boundaries of the parcel, they are not part of it. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by the 132-acre parcel, also is not part of the parcel to be transferred.

Since 2000, through the BRAC process, former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980. The Army has transferred these parcels to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources (DNR), and the LRA. The Army has already transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west-northwest.

In 2016, USFWS withdrew its interest in the 132-acre parcel of land (formerly known as Parcel FWS 5) at the southeastern end of SVADA. The Army officially identified the parcel as surplus in January 2018. The Army's proposed action is disposal of the parcel, which has been redesignated LRA Parcel 20, and transferring the property to the LRA. The Army has completed the following remediation at four contaminated cleanup sites on LRA Parcel 20:

- Site 20, Abandoned Landfill: Capped the landfill with "hot spot" removal (i.e., excavated soil containing chemicals of concern at concentrations above recreational remediation goals and buried drums and debris); transported the contaminated soil, drums, and debris to a regulated, licensed solid waste landfill for disposal; conducted site restoration; conducting long-term monitoring of groundwater and surface water; maintaining the engineered landfill cap; implemented land use controls (LUCs) that restrict site access, prohibit residential agricultural land use, and prevent intrusive activities; and will conduct further per- and polyfluoroalkyl substances investigations.
- Site 73, Stables Landfill: Conducted surface debris removal, soil excavation, and off-site disposal.
- Site 130, Vincent Road Septic System: Conducted a human health risk assessment that evaluated potential adverse health effects to communities likely to use the area based on the proposed industrial/commercial and recreational development plan. The human health risks were determined to be acceptable for receptors and specified land uses and the preferred remedy was No Further Action.
- Site 178, Ordnance School Lake: Conducted soil and sediment excavation, off-site disposal,

and implemented LUCs to prevent the site from being used for purposes other than industrial/ commercial and recreational.

The LRA's finalized 2023 reuse plan for LRA Parcel 20 and additional information regarding the disposal and reuse of the parcel is available at Base Realignment and Closure (BRAC) > Great Lakes and Ohio River Division > Programs. In its plan, the LRA presents a conceptual reuse alternative to be implemented in three phases for developing LRA Parcel 20, which focuses on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development under each phase. To facilitate implementation, the LRA would implement the phases sequentially.

Phase 1 could be implemented within a target 5-year completion window, while phases 2 and 3 could follow, with both having 5-year-plus completion windows. The LRA's proposed reuse includes activities outside the boundary of LRA Parcel 20 in the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island. All of the LRA's reuse phases would require dredging.

In addition to the LRA's proposed reuse alternative, the EIS also will evaluate a recreation-only reuse alternative and a recreation and solar reuse alternative, which involve only the elements described in the LRA's 2023 reuse plan.

If any sites are determined to be eligible for listing in the National Register of Historic Places (NRHP) through additional archaeological testing within LRA Parcel 20, cultural resources encumbrances in the form of preservation covenant will apply in perpetuity, as appropriate, based on the 2000 SVADA PA and in consultation with the Illinois State Historic Preservation Office (SHPO) under Section 106 of the NHPA. See the preservation covenant in Enclosure 5.

The 2000 SVADA PA is still in effect. A complete Phase I archaeological survey of LRA Parcel 20 was conducted by Brockington Associates (Brockington) in 2020. LRA Parcel 20 has no known buildings, structures, or traditional cultural properties currently listed in the NRHP. Two archaeological sites within LRA Parcel 20 (sites 11-CA-1 and 11-CA-142) are identified as potentially eligible for listing in the NRHP, and a third site (Site 11-CA-194) is not eligible (Enclosure 6, Archaeological Sites Map; Enclosure 7, Summary of Archaeological Sites Table). Brockington provided the survey report to the Illinois SHPO on November 4, 2020. The SHPO responded in a letter dated December 24, 2020, that the project as proposed would have no adverse effect on the two potentially eligible sites and that Site 11-CA-194 is not eligible for listing in the NRHP, but that any plan modifications must include SHPO notification (Enclosure 8, SHPO letter dated December 24, 2020). Brockington finalized the *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois* in January 2021. In the finalized report, Brockington stated the portions of sites 11-CA-1 and 11-CA-142 located within LRA Parcel 20 were not NRHP-eligible, and, therefore, the disposal of the parcel would result in no adverse effects on any cultural resources. The authors noted that a complete eligibility statement for each site could not be made, however, because the Brockington survey remained within the bounds of LRA Parcel 20 and did not survey the portions of each site located outside the parcel.

In response to the LRA's 2023 reuse plan for LRA Parcel 20 and subsequent agency scoping comments on the upcoming EIS, the Army has included four additional potentially eligible archaeological sites (11-CA-44, 11-CA-143, 11-CA-147, and 11-CA-148) and one unassessed

archaeological site (11-CA-60) outside LRA Parcel 20 as cultural resources that could be indirectly impacted by the Army's disposal of LRA Parcel 20 (Enclosure 6; Enclosure 7). While there are other cultural resources present within the APE for the proposed project, these resources were not included in the report because the Illinois SHPO determined the resources to be ineligible for the NRHP. The Army will include Site 11-CA-60 in the EIS, despite the Illinois SHPO having not assessed its eligibility, out of extreme caution relating to the potential effects of the proposed action on cultural resources. In addition, Site 11-CA-44, a Late Woodland mound and town site, is protected under the Illinois Human Remains Protection Act (Chapter 20 Illinois Compiled Statutes 3440). Sites 11-CA-44 and 11-CA-60 also are both located on land owned by USFWS that USACE has declared is Environmentally Sensitive due to the presence of archaeological resources.

If you have input regarding resources of concern to your agency or any questions concerning this BRAC action, contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter. The Draft EIS will be available for public review and comment at Base Realignment and Closure (BRAC) > Great Lakes and Ohio River Division > Programs following its publication.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2025.02.26 13:10:23 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, SVADA, Base Environmental Coordinator
Mr. Travis Black, U.S. Department of Transportation, Maritime Administration, Director, Inland Waterways Gateway (St. Louis)
Mr. Ed Britton, USFWS, Upper Mississippi River National Wildlife and Fish Refuge, Savanna District Office
Ms. Jodi Creswell, USACE, Rock Island District, Chief, Environmental Planning Branch
Ms. Charlene Falco, Illinois Environmental Protection Agency, Project Manager, Federal Site Remediation Section, Bureau of Land
Ms. Nicole Goers, U.S. Environmental Protection Agency (USEPA) Region 5, Remedial Project Manager, Remedial Response Section 5
Mr. Bradley Hayes, Illinois DNR, Manager, Impact Assessment Section
Mr. Christopher Koeppel, Advisory Council on Historic Preservation, Assistant Director, Office of Federal Agency Programs, Federal Property Management Section
Ms. Kathy Kowal, USEPA Region 5, Lead NEPA Reviewer
Mr. Kraig McPeek, USFWS Illinois-Iowa Ecological Services Field Office, Field Office Supervisor

Ms. Natalie Phelps Finnie, Illinois DNR, Director
Ms. Carol (CJ) Wallace, Illinois DNR, SHPO, Cultural Resources Coordinator

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

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

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.

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@tetratech.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@tetratech.com>; Webster, Rebecca <REBECCA.WEBSTER@tetratech.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
Direct **+1 (703) 385-1218** | Business **+1 (703) 385-6000** | michelle.cannella@tetratech.com

Tetra Tech | *Leading with Science®* | Environmental Services
10306 Eaton Place, Suite 340 | Fairfax, VA 22030 | tetratech.com



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

February 26, 2025

SUBJECT: Additional Coordination regarding Cultural Resources 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

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

Dear Ms. Goers:

The U.S. Army (Army) is initiating additional coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject environmental impact statement (EIS). The Army will prepare the EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) or other appropriate recipient and (2) the potential effects of the LRA's or other recipient's secondary indirect action of reuse of the parcel.

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Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2025.02.26 13:10:23 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
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Mr. Travis Black, U.S. Department of Transportation, Maritime Administration, Director, Inland Waterways Gateway (St. Louis)
Mr. Ed Britton, USFWS, Upper Mississippi River National Wildlife and Fish Refuge, Savanna District Office
Ms. Jodi Creswell, USACE, Rock Island District, Chief, Environmental Planning Branch
Ms. Charlene Falco, Illinois Environmental Protection Agency, Project Manager, Federal Site Remediation Section, Bureau of Land
Mr. Bradley Hayes, Illinois DNR, Manager, Impact Assessment Section
Mr. Christopher Koeppel, Advisory Council on Historic Preservation, Assistant Director, Office of Federal Agency Programs, Federal Property Management Section
Ms. Kathy Kowal, USEPA Region 5, Lead NEPA Reviewer
Ms. Krystle McClain, USEPA Region 5, NEPA Program Supervisor
Mr. Kraig McPeek, USFWS Illinois-Iowa Ecological Services Field Office, Field Office Supervisor
Ms. Natalie Phelps Finnie, Illinois DNR, Director
Ms. Carol (CJ) Wallace, Illinois DNR, SHPO, Cultural Resources Coordinator

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

February 26, 2025

SUBJECT: Additional Coordination regarding Cultural Resources 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

Ms. Kathy Kowal, Lead NEPA Reviewer
U.S. EPA Region 5
77 W. Jackson Blvd.
Chicago, IL 60604

Dear Ms. Kowal:

The U.S. Army (Army) is initiating additional coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject environmental impact statement (EIS). The Army will prepare the EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) or other appropriate recipient and (2) the potential effects of the LRA's or other recipient's secondary indirect action of reuse of the parcel.

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HQDA/ODCS G-9

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WASHINGTON, DC 20310-0600

February 26, 2025

SUBJECT: Additional Coordination regarding Cultural Resources 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

Mr. Travis Black, Director, Inland Waterways Gateway (St. Louis)
U.S. DOT Maritime Administration (MARAD)
1222 Spruce St., Suite 2.202F
St. Louis, MO 63103

Dear Mr. Black:

The U.S. Army (Army) is initiating additional coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject environmental impact statement (EIS). The Army will prepare the EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) or other appropriate recipient and (2) the potential effects of the LRA's or other recipient's secondary indirect action of reuse of the parcel.

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

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U.S. DOT Maritime Administration (MARAD)
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Washington, DC 20590

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WASHINGTON, DC 20310-0600

February 26, 2025

SUBJECT: Additional Coordination regarding Cultural Resources 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

Mr. Christopher Koeppel, Assistant Director, Office of Federal Agency Programs
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, D.C. 20001

Dear Mr. Koeppel:

The U.S. Army (Army) is initiating additional coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject environmental impact statement (EIS). The Army will prepare the EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) or other appropriate recipient and (2) the potential effects of the LRA's or other recipient's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 EIS evaluated the closure, and the Depot was officially closed in 2000. Also in 2000, the *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* (2000 SVADA PA) (Enclosure 2, Programmatic Agreement) was executed in support of the 1997 EIS to ensure adequate consideration of the effect of the closure and disposal on historic properties.

The Army originally initiated consultation with your office for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in November 2023 for the EA. Following completion of the draft EA, the Department of the Army Headquarters determined an EIS was required. The Army sent your agency an early coordination letter for the EIS in August 2024. Based on agency responses received during the EA scoping process and early coordination for the EIS, the Army also expanded the area of potential effects (APE) to include cultural resources and historic properties outside the parcel that could be impacted by the LRA's proposed reuse alternative.

At this time, the Army is initiating additional coordination with you for the EIS to request any comments you might have in addition to those you provided in your previous correspondence. The project remains unchanged from the description presented for the 2023 and 2024 coordination. The remainder of this letter provides information on the project location, the proposed action, alternatives, and potential affected cultural resources.

The 132-acre parcel is undeveloped land in Carroll County, IL (Enclosure 3, Site Map, and Enclosure 4, Topographic Map). The parcel includes Commander's Pond (formerly known as Ordnance School Lake). The parcel is bordered on the east and south by the Apple River, a tributary of the Mississippi River; the Mississippi River on the southwest; Vincent Road and Rofsteck Road on the west; and Crim Road on the north. While these rivers and roads form the boundaries of the parcel, they are not part of it. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by the 132-acre parcel, also is not part of the parcel to be transferred.

Since 2000, through the BRAC process, former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980. The Army has transferred these parcels to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources (DNR), and the LRA. The Army has already transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west-northwest.

In 2016, USFWS withdrew its interest in the 132-acre parcel of land (formerly known as Parcel FWS 5) at the southeastern end of SVADA. The Army officially identified the parcel as surplus in January 2018. The Army's proposed action is disposal of the parcel, which has been redesignated LRA Parcel 20, and transferring the property to the LRA. The Army has completed the following remediation at four contaminated cleanup sites on LRA Parcel 20:

- Site 20, Abandoned Landfill: Capped the landfill with "hot spot" removal (i.e., excavated soil containing chemicals of concern at concentrations above recreational remediation goals and buried drums and debris); transported the contaminated soil, drums, and debris to a regulated, licensed solid waste landfill for disposal; conducted site restoration; conducting long-term monitoring of groundwater and surface water; maintaining the engineered landfill cap; implemented land use controls (LUCs) that restrict site access, prohibit residential agricultural land use, and prevent intrusive activities; and will conduct further per- and polyfluoroalkyl substances investigations.
- Site 73, Stables Landfill: Conducted surface debris removal, soil excavation, and off-site disposal.
- Site 130, Vincent Road Septic System: Conducted a human health risk assessment that evaluated potential adverse health effects to communities likely to use the area based on the proposed industrial/commercial and recreational development plan. The human health risks were determined to be acceptable for receptors and specified land uses and the preferred remedy was No Further Action.

- Site 178, Ordnance School Lake: Conducted soil and sediment excavation, off-site disposal, and implemented LUCs to prevent the site from being used for purposes other than industrial/ commercial and recreational.

The LRA's finalized 2023 reuse plan for LRA Parcel 20 and additional information regarding the disposal and reuse of the parcel is available at Base Realignment and Closure (BRAC) > Great Lakes and Ohio River Division > Programs. In its plan, the LRA presents a conceptual reuse alternative to be implemented in three phases for developing LRA Parcel 20, which focuses on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development under each phase. To facilitate implementation, the LRA would implement the phases sequentially.

Phase 1 could be implemented within a target 5-year completion window, while phases 2 and 3 could follow, with both having 5-year-plus completion windows. The LRA's proposed reuse includes activities outside the boundary of LRA Parcel 20 in the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island. All of the LRA's reuse phases would require dredging.

In addition to the LRA's proposed reuse alternative, the EIS also will evaluate a recreation-only reuse alternative and a recreation and solar reuse alternative, which involve only the elements described in the LRA's 2023 reuse plan.

If any sites are determined to be eligible for listing in the National Register of Historic Places (NRHP) through additional archaeological testing within LRA Parcel 20, cultural resources encumbrances in the form of preservation covenant will apply in perpetuity, as appropriate, based on the 2000 SVADA PA and in consultation with the Illinois State Historic Preservation Office (SHPO) under Section 106 of the NHPA. See the preservation covenant in Enclosure 5.

The 2000 SVADA PA is still in effect. A complete Phase I archaeological survey of LRA Parcel 20 was conducted by Brockington Associates (Brockington) in 2020. LRA Parcel 20 has no known buildings, structures, or traditional cultural properties currently listed in the NRHP. Two archaeological sites within LRA Parcel 20 (sites 11-CA-1 and 11-CA-142) are identified as potentially eligible for listing in the NRHP, and a third site (Site 11-CA-194) is not eligible (Enclosure 6, Archaeological Sites Map; Enclosure 7, Summary of Archaeological Sites Table). Brockington provided the survey report to the Illinois SHPO on November 4, 2020. The SHPO responded in a letter dated December 24, 2020, that the project as proposed would have no adverse effect on the two potentially eligible sites and that Site 11-CA-194 is not eligible for listing in the NRHP, but that any plan modifications must include SHPO notification (Enclosure 8, SHPO letter dated December 24, 2020). Brockington finalized the *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois* in January 2021. In the finalized report, Brockington stated the portions of sites 11-CA-1 and 11-CA-142 located within LRA Parcel 20 were not NRHP-eligible, and, therefore, the disposal of the parcel would result in no adverse effects on any cultural resources. The authors noted that a complete eligibility statement for each site could not be made, however, because the Brockington survey remained within the bounds of LRA Parcel 20 and did not survey the portions of each site located outside the parcel.

In response to the LRA's 2023 reuse plan for LRA Parcel 20 and subsequent agency scoping comments on the upcoming EIS, the Army has included four additional potentially eligible

archaeological sites (11-CA-44, 11-CA-143, 11-CA-147, and 11-CA-148) and one unassessed archaeological site (11-CA-60) outside LRA Parcel 20 as cultural resources that could be indirectly impacted by the Army's disposal of LRA Parcel 20 (Enclosure 6; Enclosure 7). While there are other cultural resources present within the APE for the proposed project, these resources were not included in the report because the Illinois SHPO determined the resources to be ineligible for the NRHP. The Army will include Site 11-CA-60 in the EIS, despite the Illinois SHPO having not assessed its eligibility, out of extreme caution relating to the potential effects of the proposed action on cultural resources. In addition, Site 11-CA-44, a Late Woodland mound and town site, is protected under the Illinois Human Remains Protection Act (Chapter 20 Illinois Compiled Statutes 3440). Sites 11-CA-44 and 11-CA-60 also are both located on land owned by USFWS that USACE has declared is Environmentally Sensitive due to the presence of archaeological resources.

If you have input regarding resources of concern to your agency or any questions concerning this BRAC action, contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter. The Draft EIS will be available for public review and comment at Base Realignment and Closure (BRAC) > Great Lakes and Ohio River Division > Programs following its publication.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2025.02.26 13:10:23 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, SVADA, Base Environmental Coordinator
Mr. Travis Black, U.S. Department of Transportation, Maritime Administration, Director, Inland Waterways Gateway (St. Louis)
Mr. Ed Britton, USFWS, Upper Mississippi River National Wildlife and Fish Refuge, Savanna District Office
Ms. Jodi Creswell, USACE, Rock Island District, Chief, Environmental Planning Branch
Ms. Charlene Falco, Illinois Environmental Protection Agency, Project Manager, Federal Site Remediation Section, Bureau of Land
Ms. Nicole Goers, U.S. Environmental Protection Agency (USEPA) Region 5, Remedial Project Manager, Remedial Response Section 5
Mr. Bradley Hayes, Illinois DNR, Manager, Impact Assessment Section
Ms. Kathy Kowal, USEPA Region 5, Lead NEPA Reviewer
Ms. Krystle McClain, USEPA Region 5, NEPA Program Supervisor
Mr. Kraig McPeek, USFWS Illinois-Iowa Ecological Services Field Office, Field Office Supervisor

Ms. Natalie Phelps Finnie, Illinois DNR, Director
Ms. Carol (CJ) Wallace, Illinois DNR, SHPO, Cultural Resources Coordinator

DEPARTMENT OF THE ARMY
OFFICE OF THE DEPUTY CHIEF OF STAFF, G-9
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CEQ Unique Identifier: EISX-007-21-000-1729699335

Ms. Charlene Falco, Project Manager, Federal Site Remediation Section, Bureau of Land
Illinois EPA, Headquarters
1021 North Grand Avenue East
Springfield, IL 62794

Dear Ms. Falco:

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

Ms. Natalie Phelps Finnie, Director
Illinois DNR
1 Natural Resources Way
Springfield, IL 62702

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The 2000 SVADA PA is still in effect. A complete Phase I archaeological survey of LRA Parcel 20 was conducted by Brockington Associates (Brockington) in 2020. LRA Parcel 20 has no known buildings, structures, or traditional cultural properties currently listed in the NRHP. Two archaeological sites within LRA Parcel 20 (sites 11-CA-1 and 11-CA-142) are identified as potentially eligible for listing in the NRHP, and a third site (Site 11-CA-194) is not eligible (Enclosure 6, Archaeological Sites Map; Enclosure 7, Summary of Archaeological Sites Table). Brockington provided the survey report to the Illinois SHPO on November 4, 2020. The SHPO responded in a letter dated December 24, 2020, that the project as proposed would have no adverse effect on the two potentially eligible sites and that Site 11-CA-194 is not eligible for listing in the NRHP, but that any plan modifications must include SHPO notification (Enclosure 8, SHPO letter dated December 24, 2020). Brockington finalized the *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois* in January 2021. In the finalized report, Brockington stated the portions of sites 11-CA-1 and 11-CA-142 located within LRA Parcel 20 were not NRHP-eligible, and, therefore, the disposal of the parcel would result in no adverse effects on any cultural resources. The authors noted that a complete eligibility statement for each site could not be made, however, because the Brockington survey remained within the bounds of LRA Parcel 20 and did not survey the portions of each site located outside the parcel.

In response to the LRA's 2023 reuse plan for LRA Parcel 20 and subsequent agency scoping comments on the upcoming EIS, the Army has included four additional potentially eligible archaeological sites (11-CA-44, 11-CA-143, 11-CA-147, and 11-CA-148) and one unassessed

archaeological site (11-CA-60) outside LRA Parcel 20 as cultural resources that could be indirectly impacted by the Army's disposal of LRA Parcel 20 (Enclosure 6; Enclosure 7). While there are other cultural resources present within the APE for the proposed project, these resources were not included in the report because the Illinois SHPO determined the resources to be ineligible for the NRHP. The Army will include Site 11-CA-60 in the EIS, despite the Illinois SHPO having not assessed its eligibility, out of extreme caution relating to the potential effects of the proposed action on cultural resources. In addition, Site 11-CA-44, a Late Woodland mound and town site, is protected under the Illinois Human Remains Protection Act (Chapter 20 Illinois Compiled Statutes 3440). Sites 11-CA-44 and 11-CA-60 also are both located on land owned by USFWS that USACE has declared is Environmentally Sensitive due to the presence of archaeological resources.

If you have input regarding resources of concern to your agency or any questions concerning this BRAC action, contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter. The Draft EIS will be available for public review and comment at Base Realignment and Closure (BRAC) > Great Lakes and Ohio River Division > Programs following its publication.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2025.02.26 13:10:23 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, SVADA, Base Environmental Coordinator
Mr. Travis Black, U.S. Department of Transportation, Maritime Administration, Director, Inland Waterways Gateway (St. Louis)
Mr. Ed Britton, USFWS, Upper Mississippi River National Wildlife and Fish Refuge, Savanna District Office
Ms. Jodi Creswell, USACE, Rock Island District, Chief, Environmental Planning Branch
Ms. Charlene Falco, Illinois Environmental Protection Agency, Project Manager, Federal Site Remediation Section, Bureau of Land
Ms. Nicole Goers, U.S. Environmental Protection Agency (USEPA) Region 5, Remedial Project Manager, Remedial Response Section 5
Mr. Bradley Hayes, Illinois DNR, Manager, Impact Assessment Section
Mr. Christopher Koeppel, Advisory Council on Historic Preservation, Assistant Director, Office of Federal Agency Programs, Federal Property Management Section
Ms. Kathy Kowal, USEPA Region 5, Lead NEPA Reviewer
Ms. Krystle McClain, USEPA Region 5, NEPA Program Supervisor

Mr. Kraig McPeek, USFWS Illinois-Iowa Ecological Services Field Office, Field Office Supervisor
Ms. Carol (CJ) Wallace, Illinois DNR, SHPO, Cultural Resources Coordinator

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

February 26, 2025

SUBJECT: Additional Coordination regarding Cultural Resources 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

Mr. Bradley Hayes, Manager, Impact Assessment Section
Illinois DNR, EcoCAT, Div. of Real Estate Services & Consultation, Office of Realty & Capital Planning
1 Natural Resources Way
Springfield, IL 62702

Dear Mr. Hayes:

The U.S. Army (Army) is initiating additional coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject environmental impact statement (EIS). The Army will prepare the EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) or other appropriate recipient and (2) the potential effects of the LRA's or other recipient's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 EIS evaluated the closure, and the Depot was officially closed in 2000. Also in 2000, the *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* (2000 SVADA PA) (Enclosure 2, Programmatic Agreement) was executed in support of the 1997 EIS to ensure adequate consideration of the effect of the closure and disposal on historic properties.

The Army originally initiated consultation with your office for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in November 2023 for the EA. Following completion of the draft EA, the Department of the Army Headquarters determined an EIS was required. The Army sent your agency an early coordination letter for the EIS in August 2024. Based on agency responses received during the EA scoping process and early coordination for the EIS, the Army also expanded the area of potential effects (APE) to include cultural resources and historic properties outside the parcel that could be impacted by the LRA's proposed reuse alternative.

At this time, the Army is initiating additional coordination with you for the EIS to request any comments you might have in addition to those you provided in your previous correspondence. The project remains unchanged from the description presented for the 2023 and 2024 coordination. The remainder of this letter provides information on the project location, the proposed action, alternatives, and potential affected cultural resources.

The 132-acre parcel is undeveloped land in Carroll County, IL (Enclosure 3, Site Map, and Enclosure 4, Topographic Map). The parcel includes Commander's Pond (formerly known as Ordnance School Lake). The parcel is bordered on the east and south by the Apple River, a tributary of the Mississippi River; the Mississippi River on the southwest; Vincent Road and Rofsteck Road on the west; and Crim Road on the north. While these rivers and roads form the boundaries of the parcel, they are not part of it. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by the 132-acre parcel, also is not part of the parcel to be transferred.

Since 2000, through the BRAC process, former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980. The Army has transferred these parcels to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources (DNR), and the LRA. The Army has already transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west-northwest.

In 2016, USFWS withdrew its interest in the 132-acre parcel of land (formerly known as Parcel FWS 5) at the southeastern end of SVADA. The Army officially identified the parcel as surplus in January 2018. The Army's proposed action is disposal of the parcel, which has been redesignated LRA Parcel 20, and transferring the property to the LRA. The Army has completed the following remediation at four contaminated cleanup sites on LRA Parcel 20:

- Site 20, Abandoned Landfill: Capped the landfill with "hot spot" removal (i.e., excavated soil containing chemicals of concern at concentrations above recreational remediation goals and buried drums and debris); transported the contaminated soil, drums, and debris to a regulated, licensed solid waste landfill for disposal; conducted site restoration; conducting long-term monitoring of groundwater and surface water; maintaining the engineered landfill cap; implemented land use controls (LUCs) that restrict site access, prohibit residential agricultural land use, and prevent intrusive activities; and will conduct further per- and polyfluoroalkyl substances investigations.
- Site 73, Stables Landfill: Conducted surface debris removal, soil excavation, and off-site disposal.
- Site 130, Vincent Road Septic System: Conducted a human health risk assessment that evaluated potential adverse health effects to communities likely to use the area based on the proposed industrial/commercial and recreational development plan. The human health risks were determined to be acceptable for receptors and specified land uses and the preferred remedy was No Further Action.

- Site 178, Ordnance School Lake: Conducted soil and sediment excavation, off-site disposal, and implemented LUCs to prevent the site from being used for purposes other than industrial/ commercial and recreational.

The LRA's finalized 2023 reuse plan for LRA Parcel 20 and additional information regarding the disposal and reuse of the parcel is available at Base Realignment and Closure (BRAC) > Great Lakes and Ohio River Division > Programs. In its plan, the LRA presents a conceptual reuse alternative to be implemented in three phases for developing LRA Parcel 20, which focuses on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development under each phase. To facilitate implementation, the LRA would implement the phases sequentially.

Phase 1 could be implemented within a target 5-year completion window, while phases 2 and 3 could follow, with both having 5-year-plus completion windows. The LRA's proposed reuse includes activities outside the boundary of LRA Parcel 20 in the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island. All of the LRA's reuse phases would require dredging.

In addition to the LRA's proposed reuse alternative, the EIS also will evaluate a recreation-only reuse alternative and a recreation and solar reuse alternative, which involve only the elements described in the LRA's 2023 reuse plan.

If any sites are determined to be eligible for listing in the National Register of Historic Places (NRHP) through additional archaeological testing within LRA Parcel 20, cultural resources encumbrances in the form of preservation covenant will apply in perpetuity, as appropriate, based on the 2000 SVADA PA and in consultation with the Illinois State Historic Preservation Office (SHPO) under Section 106 of the NHPA. See the preservation covenant in Enclosure 5.

The 2000 SVADA PA is still in effect. A complete Phase I archaeological survey of LRA Parcel 20 was conducted by Brockington Associates (Brockington) in 2020. LRA Parcel 20 has no known buildings, structures, or traditional cultural properties currently listed in the NRHP. Two archaeological sites within LRA Parcel 20 (sites 11-CA-1 and 11-CA-142) are identified as potentially eligible for listing in the NRHP, and a third site (Site 11-CA-194) is not eligible (Enclosure 6, Archaeological Sites Map; Enclosure 7, Summary of Archaeological Sites Table). Brockington provided the survey report to the Illinois SHPO on November 4, 2020. The SHPO responded in a letter dated December 24, 2020, that the project as proposed would have no adverse effect on the two potentially eligible sites and that Site 11-CA-194 is not eligible for listing in the NRHP, but that any plan modifications must include SHPO notification (Enclosure 8, SHPO letter dated December 24, 2020). Brockington finalized the *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois* in January 2021. In the finalized report, Brockington stated the portions of sites 11-CA-1 and 11-CA-142 located within LRA Parcel 20 were not NRHP-eligible, and, therefore, the disposal of the parcel would result in no adverse effects on any cultural resources. The authors noted that a complete eligibility statement for each site could not be made, however, because the Brockington survey remained within the bounds of LRA Parcel 20 and did not survey the portions of each site located outside the parcel.

In response to the LRA's 2023 reuse plan for LRA Parcel 20 and subsequent agency scoping comments on the upcoming EIS, the Army has included four additional potentially eligible

archaeological sites (11-CA-44, 11-CA-143, 11-CA-147, and 11-CA-148) and one unassessed archaeological site (11-CA-60) outside LRA Parcel 20 as cultural resources that could be indirectly impacted by the Army's disposal of LRA Parcel 20 (Enclosure 6; Enclosure 7). While there are other cultural resources present within the APE for the proposed project, these resources were not included in the report because the Illinois SHPO determined the resources to be ineligible for the NRHP. The Army will include Site 11-CA-60 in the EIS, despite the Illinois SHPO having not assessed its eligibility, out of extreme caution relating to the potential effects of the proposed action on cultural resources. In addition, Site 11-CA-44, a Late Woodland mound and town site, is protected under the Illinois Human Remains Protection Act (Chapter 20 Illinois Compiled Statutes 3440). Sites 11-CA-44 and 11-CA-60 also are both located on land owned by USFWS that USACE has declared is Environmentally Sensitive due to the presence of archaeological resources.

If you have input regarding resources of concern to your agency or any questions concerning this BRAC action, contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter. The Draft EIS will be available for public review and comment at Base Realignment and Closure (BRAC) > Great Lakes and Ohio River Division > Programs following its publication.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2025.02.26 13:10:23 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, SVADA, Base Environmental Coordinator
Mr. Travis Black, U.S. Department of Transportation, Maritime Administration, Director, Inland Waterways Gateway (St. Louis)
Mr. Ed Britton, USFWS, Upper Mississippi River National Wildlife and Fish Refuge, Savanna District Office
Ms. Jodi Creswell, USACE, Rock Island District, Chief, Environmental Planning Branch
Ms. Charlene Falco, Illinois Environmental Protection Agency, Project Manager, Federal Site Remediation Section, Bureau of Land
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Mr. Christopher Koeppel, Advisory Council on Historic Preservation, Assistant Director, Office of Federal Agency Programs, Federal Property Management Section
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Ms. Krystle McClain, USEPA Region 5, NEPA Program Supervisor
Mr. Kraig McPeek, USFWS Illinois-Iowa Ecological Services Field Office, Field Office Supervisor

Ms. Natalie Phelps Finnie, Illinois DNR, Director
Ms. Carol (CJ) Wallace, Illinois DNR, SHPO, Cultural Resources Coordinator

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

February 26, 2025

SUBJECT: Consultation with the Advisory Council on Historic Preservation regarding the current Savanna Army Depot Activity Programmatic Agreement

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

REFERENCE: ACHP Project #020363

Mr. Christopher Koeppel, Assistant Director, Office of Federal Agency Programs, Federal Property Management Section
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, DC 20001

Dear Mr. Koeppel:

The U.S. Army (Army) is initiating additional coordination with your office on Title 36 of the *Code of Federal Regulations* (CFR) § 800.14(b) under Section 106 of the National Historic Preservation Act (NHPA) for the *Environmental Impact Statement (EIS) for the Implementation of Base Realignment and Closure Disposal and Reuse of LRA Parcel 20, Savanna Army Depot Activity, Illinois* (LRA Parcel 20 EIS). The Army is preparing the LRA Parcel 20 EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and implementing regulations issued by the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the LRA Parcel 20 EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) or other appropriate recipient and (2) the potential effects of the LRA's or other recipient's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 EIS evaluated the closure, and the Depot was officially closed in 2000. Also in 2000, the *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* (2000 SVADA PA) (Enclosure 2, Programmatic Agreement [PA]) was executed in support of the 1997 EIS to ensure adequate consideration of the effect of the closure and disposal on historic properties.

The Army originally initiated consultation with your office for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you on November 27, 2023, for the EA. On December 21, 2023, your agency responded to the Army's consultation letter. The response letter stated:

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.

Following the completion of draft EA, the Department of the Army Headquarters determined the undertaking required an EIS. The Army sent your agency an early coordination letter for the EIS on August 8, 2024. Your agency responded to the letter via email on August 21, 2024, stating, "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."

According to your December 21, 2023, response, the ACHP's understanding of when SVADA is required to enact a preservation covenant differs from the 2000 SVADA PA (Enclosure 2). Section IV.G of the PA states:

> If the Army cannot transfer the property or properties that contain **National Register eligible archaeological sites** pursuant to the provisions set forth in paragraphs IV. C, C, E, and F above, then the Army will consult with the SHPO, the Council, and (with respect to transfers pursuant to paragraphs IV. C, D, E, and F) the prospective transferee(s) to determine appropriate modifications to the preservation covenant contained in Attachment E that are necessary in or to complete the transfer of the property(ies) within the established disposal timelines. Such modifications shall be limited to those that are reasonably necessary in order to effect transfer of, or effectively market, the concerned property within established timelines.

The Illinois State Historic Preservation Office (SHPO) currently has the two referenced archaeological sites within LRA Parcel 20, 11-CA-1 and 11-CA-142, listed as **potentially eligible** for the National Register of Historic Places (Enclosure 3, Potentially Eligible Archaeological Sites). Based on the Army's current interpretation of the 2000 SVADA PA, the transfer of LRA Parcel 20 to the LRA would not require the incorporation of a preservation covenant.

The Army asks your agency for concurrence regarding the Army's interpretation of the 2000 SVADA PA. If the ACHP does not concur with the Army's interpretation of incorporating a preservation covenant, the Army invites further consultation on how the 2000 SVADA PA can be adapted to more closely comply with NHPA Section 106.

If you have input regarding the 2000 SVADA PA and incorporating a preservation covenant for the transfer of LRA Parcel 20, resources of concern to your agency, or any questions concerning this BRAC action, contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter.

Sincerely,

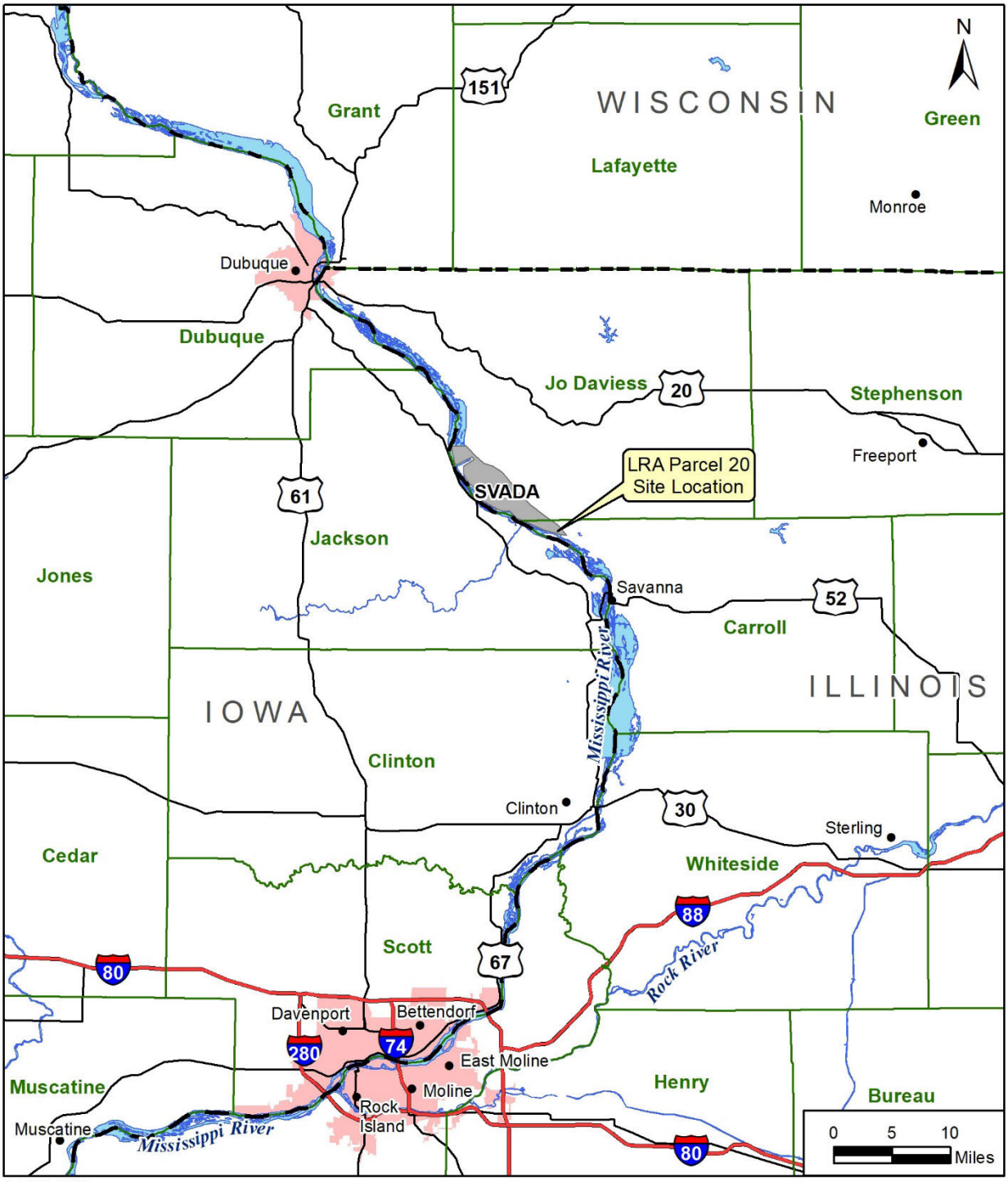
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Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, U.S. Army Corps of Engineers, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, SVADA, Base Environmental Coordinator
Ms. Carol (CJ) Wallace, Illinois Department of Natural Resources, SHPO, Cultural Resources Coordinator

Enclosure 1: Location Map



LEGEND

- State Boundary
- County Boundary
- Interstate Highway
- U.S. Route
- Urban Area
- Surface Water

Enclosure 2: Programmatic Agreement

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

August 2000

Whereas the United States Army (Army) is responsible for implementation of applicable provisions of the Defense Base Closure and Realignment Act of 1990 (P.L. 101-510) as amended, and is proceeding with the closure of Savanna Army Depot Activity (SVDA), and consequent disposal of excess and lus property in a manner consistent with the requirements of the applicable Defense Base Closure and Realignment Commission recommendation; and

Whereas the Army has determined that leasing, 1 ensing and/or disposal of all or portions of S'\,'DA, in Illinois, may have an effect upon historic properties that have been designated as eligible for listing in, the National Register of Historic Places, and has consulted with the Illinois State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation (Council) pursuant to 36 C.F.R. Part 800, regulations implementing Section 106 of the National Historic Preservation Act (16 U.S.C. Section 470(f), Section ll0(f) of the same Act (16 U.S.C. Section 470h-2[f]), and Section 111 of the same Act (16 U.S.C. Section 470h-3); and

Whereas after real estate screening activities were conducted it was determined that S\J'DA surplus lands will be divided between the U.S. Fish and Wildlife Service, the U.S. Army Corps of Engineers, the Illinois Department of Natural Resources, and the Jo Carroll Depot Local Reuse Authority; and

Whereas the Army will conduct cultural resource inventory activities only for those lands to be transferred to non-fede entities; and

Whereas the Army has completed a number of historic architectural and archeological surveys (listed in Attachment A) to support

disposal of portions of the BRAC property to non-federal entities; and

Whereas none of the SVDA buildings to be conveyed to non-federal entities, examined by the 1997 architectural inventory study, were determined to be eligible for the National Register of Historic Places; and

Whereas a number of archeological sites located within those SVDA BRAC excess lands scheduled for disposal to non-federal entities have been determined to be eligible or potentially eligible for the National Register of Historic Places (listed in Attachment B); and

Whereas not all BRAC lands to be disposed of to non-federal entities can be surveyed for archeological resources until the lands have been examined for and, if necessary, cleared of unexploded ordnance (UXO); and

Whereas interested members of the public, including the Jo Carroll Depot Local Redevelopment Authority, and Native Americans, have been provided opportunities to comment on the effects this base closure may have on historic properties at SVDA through public hearings, consultation meetings, and other means; and

Whereas in carrying out the disposal of excess and surplus property the Army will comply with all applicable laws and regulations, including 36 C.F.R. Part 79, Curation of Federally-Owned and Administered Archeological Collections;

Whereas the Jo Carroll Depot Local Redevelopment Authority has been invited to concur in this agreement document; and

NOW, THEREFORE, the Army, the SHPO, and the Council agree that the undertaking described above shall be implemented in accordance with the following stipulations to take into account the effect of the undertaking on historic properties.

STIPULATIONS - The Army will ensure that the following measures are carried out:

I. Identification and Evaluation

A. The Army will conduct Phase I archeological site location surveys for those SVDA lands that are to be transferred to non-federal entities and that have not been previously surveyed for archeological resources (Appendix C map

displays those SVDA lands that will be surveyed for archeological resources).

B. For lands that must be examined for potential UXO contamination, archeological surveys will be conducted only after the area has been examined for UXO and has been determined as being safe for subsurface archeological testing. Due to explosive ordnance qualification requirements and safety factors, no archeologists will be made part of the actual UXO field survey and disposal teams. However, archeologists associated with the UXO contractor and the U.S. Army Corps of Engineers (USACE) will be available for consultations and to examine any archeological finds that may be made in the course of the UXO investigations. The following procedures will be followed by the UXO disposal teams that will conduct the UXO surveys.

1. Prior to the initiation of field investigations at SVDA, UXO survey personnel will receive a cultural resources orientation concerning known cultural resource sites within the project area and recognition of cultural resource artifactual materials that could be encountered by the UXO investigations.

2. UXO surveys will involve location of metallic objects by metal detectors and hand excavation of these metallic objects by UXO disposal experts. Non UXO related metallic objects and any other cultural items encountered by the investigators will be left on the ground surface adjacent to the hole from which they were removed for later examination and, if appropriate, collection during subsequent archeological surveys.

3. UXO field survey personnel will notify the SVDA BRAC Environmental Coordinator (BEC) and the contract or USACE archeologist of any cultural materials or human skeletal materials encountered during the UXO investigations. If human skeletal remains are encountered, UXO investigations will be immediately halted for that sampling grid and the SVDA BEC and USACE archeologist will make arrangements to determine the origin of the human remains and whether the requirements of the Native American Graves Protection and Repatriation Act (NAGPRA) should be enacted.

4. UXO related items encountered by the UXO disposal experts may be removed from the location where they are encountered for disposal or may be exploded *in situ*, if removal is considered to be too hazardous.

C. The Army will coordinate the findings and recommendations for all SVDA archeological surveys with the Illinois SHPO as the survey reports are completed.

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.

III. Licenses and Leases

Licenses or leases, to other than federal agencies, of historic properties will include language provided in Attachment D of this agreement as appropriate.

IV. Disposal of SVDA Properties

A. Transfer of Real Property That Does Not Contain Historic Properties

In leasing or disposing of real property and improvements--for which identification and evaluation have been completed in consultation with the SHPO--that do not contain historic properties, any portion of an historic property, archeological sites, or any portion of an archeological site, no further action is necessary under this agreement. The Army will, however, promptly notify the SHPO that such a transfer has been completed.

B. Assignments to Other Federal Agencies

In assigning historic property (ies) directly to another Federal agency by a transfer authority such as The Federal Property and Administrative Services Act of 1949, as amended (40 U.S.C. § 471 et seq.), the receiving Federal agency will be deemed responsible for compliance with 36 C.F.R. Part 800 and any other applicable state or Federal laws and regulations with respect to the maintenance and disposal of these properties. The Army will promptly notify the SHPO and Council in writing of each Federal agency that has requested and been assigned such property.

C. Public Benefit Conveyances to Non-Federal Recipients

In disposing of historic property(ies) directly to a non-Federal recipient - at the request of a sponsoring Federal agency, and pursuant to the Public Benefit Conveyance authorities contained in the Federal Property and Administrative Services Act of 1949, as amended (40 U.S.C. § 471 et seq.), and other applicable authorities - an appropriate preservation covenant (found at Attachment E) will be incorporated in the transfer instrument(s). The Army will promptly notify the SHPO and Council in writing of each such transfer of an archeological-site property.

D. Economic Development Conveyances to LRAs

In disposing of historic property(ies) to a Local Redevelopment Authority (LRA) pursuant to the Economic Development Conveyance authority contained in the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510, as amended), an appropriate preservation covenant (found at Attachment E) will be incorporated in the transfer instrument(s). The Army will promptly notify the SHPO and Council in writing of each such transfer of an archeological-site property.

E. Competitive Sales

In disposing of historic properties via a competitive sale transfer authority, the Army's bid solicitation will contain the following information:

(1) Information on the property's archeological significance, identifying elements, or other characteristics of the property that should be given special consideration in planning;

(2) Information on financial incentives for preservation of archeological properties;

(3) Information indicating that an appropriate preservation covenant will be incorporated in the instrument transferring title to the property, and that this covenant will be substantively identical to the one contained in Attachment E of this agreement (as appropriate), unless modifications are authorized pursuant to the process described in paragraph IV. G, below, and as required to accord the covenants with state law.

In developing the above information for inclusion in its initial bid solicitation document, the Army will solicit the advice and

assistance of the SHPO. The Army need not solicit such advice and assistance in preparing subsequent solicitation documents, unless such documents contain historic properties information that materially differs from that included in the initial solicitation document. The Army will notify the SHPO and Council in writing of each such transfer of an archeological-site property.

F. Negotiated Sales

In disposing of historic properties via a negotiated sale transfer authority, the Army will provide a written document ("negotiation document") to the negotiating party that sets forth the same information described in subparagraphs IV. E (1), (2) & (3), above. In developing this information for inclusion in the negotiation document to be provided to the initial negotiating party, the Army will solicit the advice and assistance of the SHPO. The Army need not solicit such advice and assistance in preparing negotiation documents for subsequent negotiating parties, unless such documents contain historic properties information that materially differs from that included in the document provided to the initial negotiating party. The Army will notify the SHPO and Council in writing of each such transfer of an archeological-site property.

G. Covenant Modification to Facilitate Transfer

If the Army cannot transfer the property or properties that contain National Register eligible archeological sites pursuant to the provisions set forth in paragraphs IV. C, D, E, and F above, then the Army will consult with the SHPO, the Council, and (with respect to transfers pursuant to paragraphs IV. C, D, and F) the prospective transferee(s) to determine appropriate modifications to the preservation covenant contained in Attachment E that are necessary in order to complete transfer of the property(ies) within established disposal timelines. Such modifications shall be limited to those that are reasonably necessary in order to effect transfer of, or effectively market, the concerned property within established timelines.

V. Environmental Remediation

A. UXO identification and removal will be handled as described in Stipulation I.B of this agreement document. As they are developed, the plans for other proposed environmental remediation activities will be reviewed by the SVDA BRAC Environmental Coordinator (BEC) to identify any effects to historic properties, known or yet to be discovered. If the Army determines that a proposed remediation activity will take place

less than 100 feet from a historic property and has the potential to affect that property, the Army will consult with the SHPO to determine what steps, if any, should be taken with respect to those effects.

B. Proposed remediation plans that the Army determines may affect historic properties will be submitted to the SHPO for review and comment in accordance with the following procedures:

(1) Proposed remediation plans or supplemental documentation furnished by the Army will provide descriptions of any potential conflicts between remediation and preservation of historic properties;

(2) In situations where the Army determines that there is an immediate threat to human health, safety, or the environment, and that remediation must proceed without first taking steps to preserve historic properties, then the Army's reasons for so determining will be fully described;

(3) In situations where the Army determines that there is not an immediate threat to human health, safety, or the environment, and that implementation of its proposed remediation plan will result in the destruction or substantial alteration of any historic property, then the Army shall either modify its remediation plan to avoid the adverse effect or implement data recovery and/or recordation in consultation with the SHPO, taking into account health and safety constraints inherent in properties containing hazardous materials, resource availability, and any other relevant constraints.

VI. Anti-Deficiency Act

The stipulations of this agreement are subject to the provisions of the Anti-Deficiency Act. If compliance with the Anti-Deficiency Act alters or impairs the Army's ability to implement the stipulations of this agreement, the Army will consult in accordance with the amendment and termination procedures found at Sections IX. and X. of this agreement.

VII. Status Reports

Until such time as all SVDA archeological properties have been transferred from Army control in accordance with the terms of this agreement, the Army will provide an annual status report

to the Council and Illinois SHPO to review implementation of the terms of this agreement and to determine whether amendments are needed. If amendments are needed, the signatories to this agreement will consult, in accordance with Stipulation IX. of this agreement, to make such revisions.

VIII. Dispute Resolution

A. Should the Illinois SHPO and/or the Council object within thirty (30) days to any plans or other documents provided by the Army or others for review pursuant to this agreement, or to any actions proposed or initiated by the Army pursuant to this agreement, the Army shall consult with the objecting party to resolve the objection. If the Army determines that the objection cannot be resolved, the Army shall forward all documentation relevant to the dispute to the Council. Within thirty (30) days after receipt of all pertinent documentation, the Council will either:

(1) Provide the Army with recommendations, which the Army will take into account in reaching a final decision regarding the dispute; or

(2) Notify the Army that it will comment pursuant to 36 C.F.R. 800.7(c), and proceed to comment.

Any Council comment will be taken into account by the Army in accordance with 36 C.F.R. 800.7(c)(4) with reference to the subject of the dispute.

B. Any recommendations or comment provided by the Council pursuant to Stipulation VIII. A above will pertain only to the subject of the dispute; the Army's responsibility to carry out all other actions under this agreement that are not the subjects of the dispute will remain unchanged.

C. At any time during implementation of the measures stipulated in this agreement by the Army, if an objection to any such measure or its manner of implementation is raised by interested persons, then the Army shall consider the objection and consult, as appropriate, with the objecting party, the SHPO, and the Council to attempt to resolve the objection.

IX. Amendments

A. The Army, Illnois SHPO, and/or Council may request that this PA be revised, whereby the parties will consult to consider whether such revision is necessary.

B. If it is determined that revisions to this PA are necessary, then the Army, the Council, and the SHPO shall consult pursuant to 36 C.F.R. 800.6(c)(7), as appropriate, to make such revisions. Except that, reviewing parties must comment on, or signify their acceptance of, the proposed changes to the PA in writing within 30 days of their receipt.

X. Termination of Agreement

A. The Army, Illnois SHPO, and/or Council may terminate this PA by providing thirty (30) days written notice to the other signatory parties. During the period after notification and prior to termination the Army, the Council, and the SHPO will consult to seek agreement on amendments or other actions that would avoid termination. In the event of termination, the Army will comply with 36 CFR Part 800.6(c)(8) with regard to individual undertakings associated with the BRAC disposal action.

Execution and implementation of this PA evidences that the Army has afforded the Council a reasonable opportunity to comment on the closure and disposal of excess and surplus property at SVDA, and that the Army has taken into account the effects of the undertaking on historic properties. Execution and compliance with this programmatic agreement fulfills the Army's Section 106 responsibilities regarding the closure and disposal of Savanna Army Depot Activity.

DEPARTMENT OF THE ARMY

By: Charles S. Mahan Jr. Date: 21 August 2000
Charles S. Mahan, Jr.
Major General, USA
Chief of Staff

ILLINOIS STATE HISTORIC PRESERVATION OFFICER

By: _____ Date: 9-20-00
Anne Haaker
Deputy State Historic Preservation Officer

ADVISORY COUNCIL ON HISTORIC PRESERVATION

By: John M. Fowler Date: 10/13/00
John Fowler
Executive Director

Concur:

JO CARROLL DEPOT LOCAL REDEVELOPMENT AUTHORITY

By: _____ Date: 9-25-00
John A. Morehead
Executive Director

ATTACHMENT A

Bibliography of Cultural Resource Studies Conducted to Support BRAC Disposal of Savanna Army Depot Activity Properties

Ball, Donald B.
1997 *A Cultural Resources Reconnaissance of A Proposed 164 Acre Prison Site, Savanna Army Depot Activity, Jo Daviess County, Illinois*. Report prepared by the U.S. Army Corps of Engineers, Louisville District.

Hardlines
1997 *Architectural Inventory of a Portion of the Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois*. A report prepared for the U.S. Army Corps of Engineers, Louisville District by Hardlines: Design and Delineation, a subcontractor of International Technology, Inc.

Miller, Orloff G., Sarah Adams, and E. Jeanne Harris
1999 *Phase I Archaeological Survey of ca. 212 Acres (85.8 hectares) at the Savanna Army Depot Activity, Carroll County Illinois*. A report prepared for the U.S. Army Corps of Engineers, Louisville District by Gray and Pape, Inc.

Whitman, Linda G. and Nathan Young
1998 *Phase I Literature Review and Archaeological Cultural Resource Survey of 210 Acres (85 ha) at Savanna Army Depot Activity, Carroll County, Illinois*. A report prepared for the U.S. Army Corps of Engineers, Louisville District by ASC Group, Inc., a subcontractor of the IT Corporation.

ATTACHMENT B

Savanna Army Depot Activity, Illinois
Known Historic Properties on or Eligible for
the National Register of Historic Places
that will be Disposed of to Non-Federal Entities

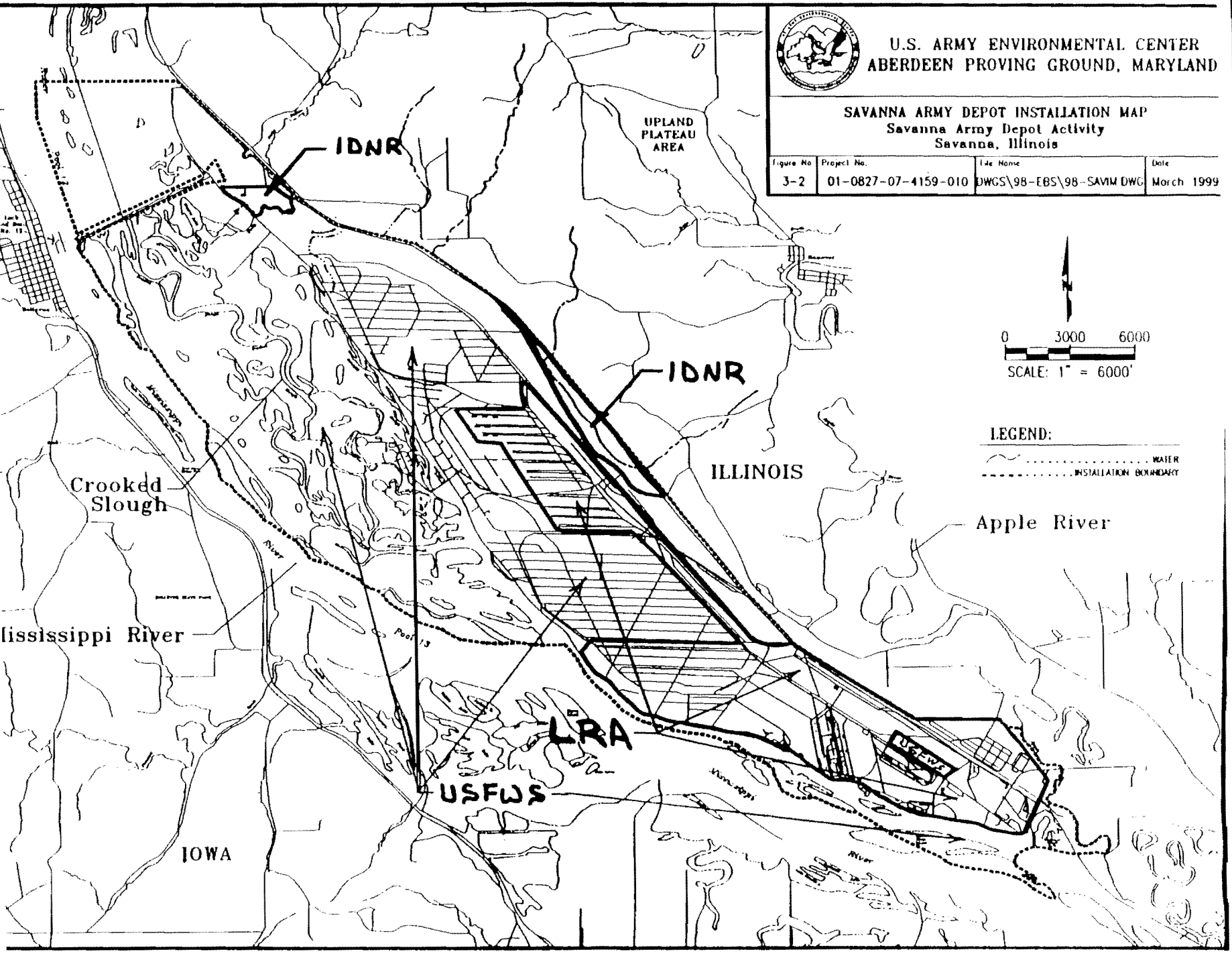
11CA1*
11CA2
11CA3+
11CA139*
11CA142
11CA143*
11CA147
11CA148
11CA149

* Lands making up this archeological site lie within two BRAC disposal parcels, one to be acquired by the local reuse authority and the other by the U.S. Fish and Wildlife Service.

+ The mounds formerly associated with this site have been destroyed, but the site may still have the potential to possess subsurface burials.

ATTACHMMENT C

Map Displaying the Location of
Savanna Army Depot Activity Lands to be
Transferred to Federal and
Non-Federal Entities


U.S. ARMY ENVIRONMENTAL CENTER
ABERDEEN PROVING GROUND, MARYLAND
SAVANNA ARMY DEPOT INSTALLATION MAP
Savanna Army Depot Activity
Savanna, Illinois
Figure No 3-2
Project No. 01-0827-07-4159-010
File Name DWGS\98-EBS\98-SAVIM.DWG
Date March 1999
IDNR
UPLAND PLATEAU AREA
IDNR
ILLINOIS
Crooked Slough
Apple River
lississippi River
Pool 13
LRA
USFWS
IOWA
0 3000 6000
SCALE: 1" = 6000'
LEGEND:
WATER
INSTALLATION BOUNDARY

ATTACHMENT D - **Language to be included in lease and license agreements when archeological sites are present.**

Archeological Property(ies) Lessee (License) Language

Archeological property(ies)XXX is/are (eligible for inclusion in/listed in) the National Register of Historic Places. The Lessee (Licensee) shall ensure that the property(ies) remain(s) undisturbed. The Lessee (Licensee) will notify the Army of any proposed ground disturbance to the archeological property prior to undertaking said ground disturbance. Notification will include a detailed description of the proposed undertaking. If the Army does not object to the proposal within 30 days of receipt of such notification and adequate supporting documentation, the Army will, with the assistance of the Lessee (Licensee), initiate consultation with the Illinois SHPO in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, "Protection of Historic Properties" (36 C.F.R. Part 800). The Lessee (Licensee) will not undertake the proposed action until the Army notifies the Lessee (Licensee) that the requirements of Section 106 have been fulfilled and the Lessee (Licensee) may proceed. If the Army objects to the Lessee's (Licensee's) proposed ground disturbance, the Lessee shall not undertake the proposed action.

ATTACHMENT E: STANDARD PRESERVATION COVENANT FOR CONVEYANCE OF PROPERTY THAT INCLUDES ARCHEOLOGICAL SITES

1. In consideration of the conveyance of the real property that includes the [official number(s) designation of archeological site(s)] located in the County of [name of county], Illinois, which is more fully described as [insert legal description], [Name of property recipient] hereby covenants on behalf of [himself/herself/itself], [his/her/its] heirs, successors, and assigns at all times to the Illinois State Historic Preservation Officer (SHPO), to maintain and preserve [official number(s) designation of archeological site(s)], in accordance with the provisions of paragraphs 2 through 11 of this covenant.

2. (Name of property recipient) will notify the Illinois SHPO in writing prior to undertaking any disturbance of the ground surface or any other action on [official number(s) designation of archeological site(s)] that would affect the physical integrity of this/these site(s). Such notice shall describe in reasonable detail the proposed undertaking and its expected effect on the physical integrity of [official number(s) designation of archeological site(s)].

3. Within thirty (30) calendar days of the Illinois SHPO's receipt of notification provided by (name of property recipient) pursuant to paragraph 2 of this covenant, the SHPO will respond to (name of property recipient) in writing as follows:

(a) That (name of property recipient) may proceed with the proposed undertaking without further consultation; or

(b) That (name of property recipient) must initiate and complete consultation with the Illinois SHPO before (he/she/it) can proceed with the proposed undertaking.

If the Illinois SHPO fails to respond to the (name of property recipient)'s written notice within thirty (30) calendar days of the SHPO's receipt of the same, then (name of property recipient) may proceed with the proposed undertaking without further consultation with the SHPO.

4. If the response provided to (name of property recipient) by the Illinois SHPO pursuant to paragraph 3 of this covenant requires consultation with the SHPO, then both parties will so consult in good faith to arrive at mutually-agreeable and appropriate measures that (name of property recipient) will employ to mitigate any adverse effects associated with the proposed undertaking. If the parties are unable to arrive at such mutually-agreeable mitigation measures, then (name of property recipient) shall, at a minimum, undertake recordation

for the concerned property--in accordance with the Secretary of Interior's standards for recordation and any applicable state standards for recordation, or in accordance with such other standards to which the parties may mutually agree--prior to proceeding with the proposed undertaking. Pursuant to this covenant, any mitigation measures to which (name of property recipient) and the SHPO mutually agree, or any recordation that may be required, shall be carried out solely at the expense of (name of property recipient).

5. [Name of recipient] shall make every reasonable effort to prohibit any person from vandalizing or otherwise disturbing any archeological site determined by the Illinois SHPO to be eligible for inclusion in the National Register of Historic Places. Any such vandalization or disturbance shall be promptly reported to the Illinois SHPO.

6. The Illinois SHPO shall be permitted at all reasonable time to inspect [parcel designation] in order to ascertain its condition and to fulfill its responsibilities hereunder.

7. In the event of a violation of this covenant, and in addition to any remedy now or hereafter provided by law, the Illinois SHPO may, following reasonable notice to [name of recipient], institute suit to enjoin said violation or to require the restoration of any archeological site affected by such violation.

8. [Name of recipient] agrees that the Illinois SHPO may, at its discretion, after 30 days notice to [name of recipient], convey and assign all or part of its rights and responsibilities contained in this covenant to a third party.

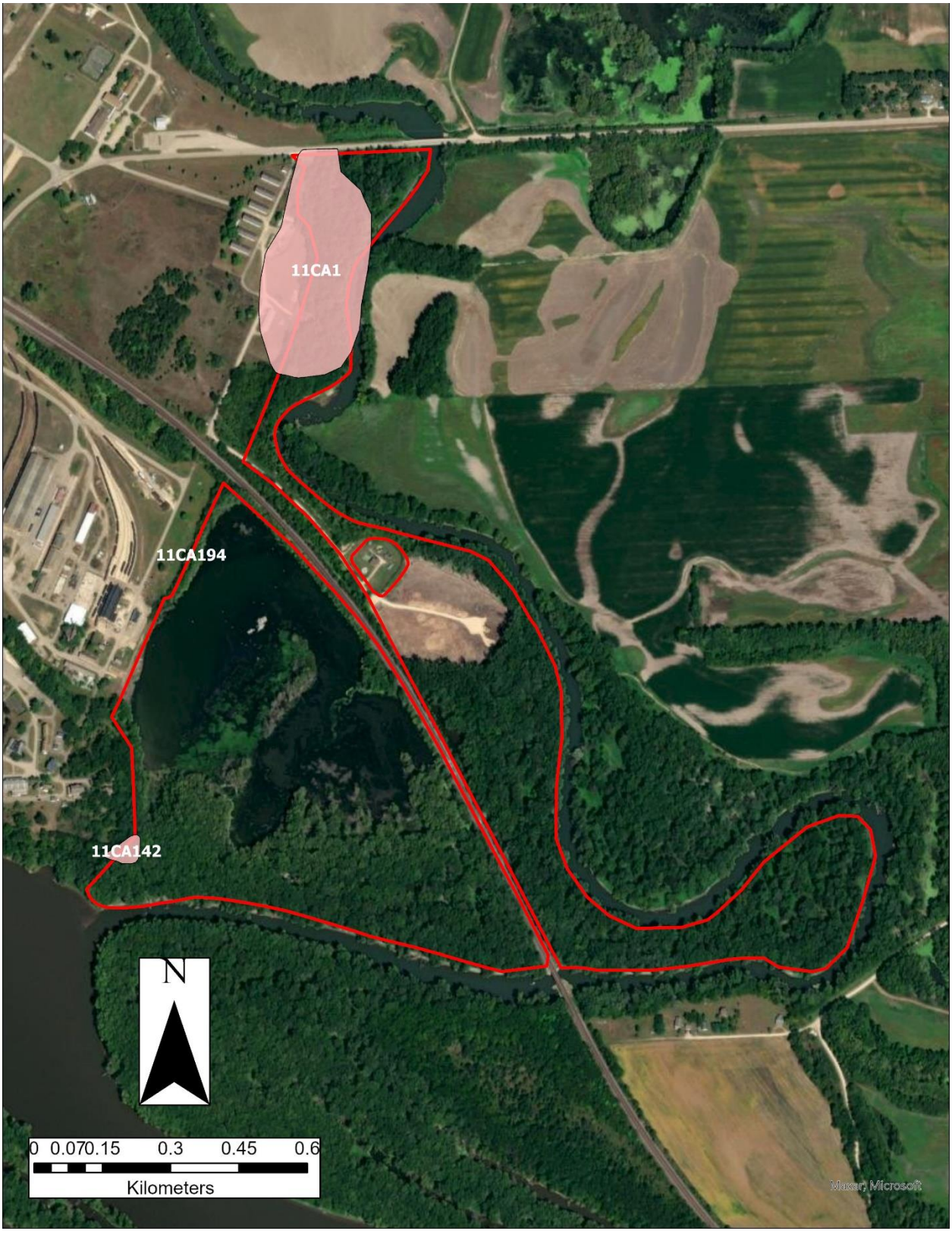
9. This covenant is binding on [name of recipient], [his/her/its] heirs, successors, and assigns in perpetuity. Restrictions, stipulations, and covenants contained herein shall be inserted by [name of recipient] verbatim or by express reference in any deed or other legal instrument by which [he/she/it] divests [himself/herself/itself] of either the fee simple title or any other lesser estate in [parcel designation] or any part thereof.

10. The failure of the Illinois SHPO to exercise any right or remedy granted under this instrument shall not have the effect of waiving or limiting the exercise of any other right or remedy or the use of such right or remedy at any other time.

11. The covenant shall be a binding servitude upon the real property that includes [official number(s) designation of archeological site(s)] and shall be deemed to run with the land. Execution of this covenant shall constitute conclusive evidence

that [name of recipient] agrees to be bound by the foregoing conditions and restrictions and to perform the obligations herein set forth.

Enclosure 3: Potentially eligible archaeological sites within the bounds of LRA Parcel 20.



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

February 26, 2025

SUBJECT: Additional Coordination regarding Cultural Resources 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

Mr. Kent Collier, NAGPRA
Kickapoo Tribe of Oklahoma
105365 S. Hwy 102
McLoud, OK 74851

Dear Mr. Collier:

The U.S. Army (Army) is initiating additional coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject environmental impact statement (EIS). The Army will prepare the EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) or other appropriate recipient and (2) the potential effects of the LRA's or other recipient's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 EIS evaluated the closure, and the Depot was officially closed in 2000. Also in 2000, the *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* (2000 SVADA PA) (Enclosure 2, Programmatic Agreement) was executed in support of the 1997 EIS to ensure adequate consideration of the effect of the closure and disposal on historic properties.

The Army originally initiated consultation with your office for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in November 2023 for the EA. Following completion of the draft EA, the Department of the Army Headquarters determined an EIS was required. The Army sent your Tribe an early coordination letter for the EIS in August 2024. Based on responses received during the EA scoping process and early coordination for the EIS, the Army also expanded the area of potential effects (APE) to include cultural resources and historic properties outside the parcel that could be impacted by the LRA's proposed reuse alternative.

At this time, the Army is initiating additional coordination with you for the EIS to request any comments you might have in addition to those you provided in your previous correspondence. The project remains unchanged from the description presented for the 2023 and 2024 coordination. The remainder of this letter provides information on the project location, the proposed action, alternatives, and potential affected cultural resources.

The 132-acre parcel is undeveloped land in Carroll County, IL (Enclosure 3, Site Map). The parcel includes Commander's Pond (formerly known as Ordnance School Lake). The parcel is bordered on the east and south by the Apple River, a tributary of the Mississippi River; the Mississippi River on the southwest; Vincent Road and Rofsteck Road on the west; and Crim Road on the north. While these rivers and roads form the boundaries of the parcel, they are not part of it. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by the 132-acre parcel, also is not part of the parcel to be transferred.

Since 2000, through the BRAC process, former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980. The Army has transferred these parcels to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the LRA. The Army has already transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west-northwest.

The LRA's finalized 2023 reuse plan for LRA Parcel 20 and additional information regarding the disposal and reuse of the parcel is available at Base Realignment and Closure (BRAC) > Great Lakes and Ohio River Division > Programs. In its plan, the LRA presents a conceptual reuse alternative to be implemented in three phases for developing LRA Parcel 20, which focuses on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development under each phase. To facilitate implementation, the LRA would implement the phases sequentially.

Phase 1 could be implemented within a target 5-year completion window, while phases 2 and 3 could follow, with both having 5-year-plus completion windows. The LRA's proposed reuse includes activities outside the boundary of LRA Parcel 20 in the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island. All of the LRA's reuse phases would require dredging.

In addition to the LRA's proposed reuse alternative, the EIS also will evaluate a recreation-only reuse alternative and a recreation and solar reuse alternative, which involve only the elements described in the LRA's 2023 reuse plan.

If any sites are determined to be eligible for listing in the National Register of Historic Places (NRHP) through additional archaeological testing within LRA Parcel 20, cultural resources encumbrances in the form of preservation covenant will apply in perpetuity, as appropriate, based on the 2000 SVADA PA and in consultation with the Illinois State Historic Preservation Office (SHPO) under Section 106 of the NHPA. See the preservation covenant in Enclosure 4.

The 2000 SVADA PA is still in effect. A complete Phase I archaeological survey of LRA Parcel 20 was conducted by Brockington Associates (Brockington) in 2020. LRA Parcel 20 has no known buildings, structures, or traditional cultural properties currently listed in the NRHP. Two archaeological sites within LRA Parcel 20 (sites 11-CA-1 and 11-CA-142) are identified as potentially eligible for listing in the NRHP, and a third site (Site 11-CA-194) is not eligible (Enclosure 5, Archaeological Sites Map; Enclosure 6, Summary of Archaeological Sites Table). Brockington provided the survey report to the Illinois SHPO on November 4, 2020. The SHPO responded in a letter dated December 24, 2020, that the project as proposed would have no adverse effect on the two potentially eligible sites and that Site 11-CA-194 is not eligible for listing in the NRHP, but that any plan modifications must include SHPO notification (Enclosure 7, SHPO letter dated December 24, 2020). Brockington finalized the *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois* in January 2021. In the finalized report, Brockington stated the portions of sites 11-CA-1 and 11-CA-142 located within LRA Parcel 20 were not NRHP-eligible, and, therefore, the disposal of the parcel would result in no adverse effects on any cultural resources. The authors noted that a complete eligibility statement for each site could not be made, however, because the Brockington survey remained within the bounds of LRA Parcel 20 and did not survey the portions of each site located outside the parcel.

In response to the LRA's 2023 reuse plan for LRA Parcel 20 and subsequent scoping comments on the upcoming EIS, the Army has included four additional potentially eligible archaeological sites (11-CA-44, 11-CA-143, 11-CA-147, and 11-CA-148) and one unassessed archaeological site (11-CA-60) outside LRA Parcel 20 as cultural resources that could be indirectly impacted by the Army's disposal of LRA Parcel 20 (Enclosure 5; Enclosure 6). While there are other cultural resources present within the APE for the proposed project, these resources were not included in the report because the Illinois SHPO determined the resources to be ineligible for the NRHP. The Army will include Site 11-CA-60 in the EIS, despite the Illinois SHPO having not assessed its eligibility, out of extreme caution relating to the potential effects of the proposed reuse alternatives to cultural resources. In addition, Site 11-CA-44, a Late Woodland mound and town site, is protected under the Illinois Human Remains Protection Act (Chapter 20 Illinois Compiled Statutes 3440). Sites 11-CA-44 and 11-CA-60 also are both located on land owned by USFWS that USACE has declared is Environmentally Sensitive due to the presence of archaeological resources.

If you have input regarding resources of concern to your Tribe or any questions concerning this BRAC action, contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter. The Draft EIS will be available for public review and comment at Base Realignment and Closure (BRAC) > Great Lakes and Ohio River Division > Programs following its publication later this year.

Sincerely,

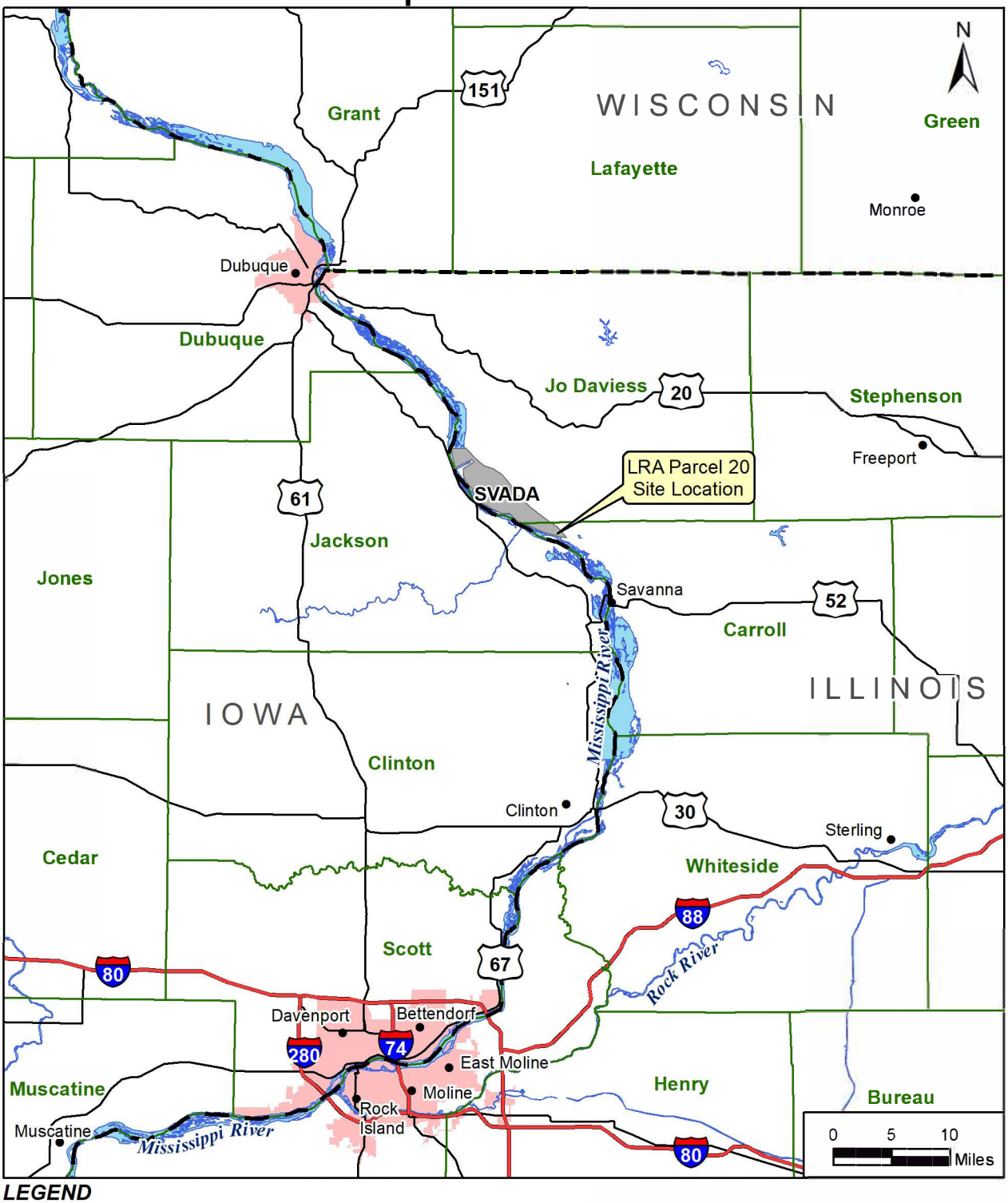
LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2025.02.26 13:14:02 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, SVADA, Base Environmental Coordinator
Ms. Susan Tiger, NAGPRA Representative, Kickapoo Tribe of Oklahoma
Mr. Darwin Kaskaske, Chairman, Kickapoo Tribe of Oklahoma
Mr. Jon Greendeer, President, Ho-Chunk Nation of Wisconsin
Mr. William Quackenbush, Tribal Historic Preservation Officer (THPO), Ho-Chunk Nation of Wisconsin
Ms. Melissa Wiatrolik, THPO, Little Traverse Bay Bands of Odawa Indians
Ms. Regina Gasco-Bentley, Chairperson, Little Traverse Bay Bands of Odawa Indians
Mr. David Grignon, THPO, Menominee Indian Tribe of Wisconsin
Ms. Gena Kakkak, Chairwoman, Menominee Indian Tribe of Wisconsin
Mr. Logan York, THPO, Miami Tribe of Oklahoma
Mr. Douglas Lankford, Chief, Miami Tribe of Oklahoma
Dr. Andrea Hunter, Director and THPO, Historic Preservation Office, The Osage Nation
Mr. Geoffrey Standing Bear, Principal Chief, The Osage Nation
Ms. Tiauna Carnes, Chairperson, Sac & Fox Nation of Missouri in Kansas and Nebraska
Ms. Sandra Massey, THPO, Sac & Fox Nation, Oklahoma
Mr. Randle Carter, Principal Chief, Sac & Fox Nation, Oklahoma
Mr. Vern Jefferson, Chairman, Sac & Fox Tribe of the Mississippi in Iowa
Mr. Johnathon Buffalo, THPO, Sac & Fox Tribe of the Mississippi in Iowa
Ms. Sunshine Thomas-Bear, THPO, Winnebago Tribe of Nebraska
Ms. Victoria Kitcheyan, Chairwoman, Winnebago Tribe of Nebraska

Enclosure 1: Location Map



LEGEND

- State Boundary
- County Boundary
- Interstate Highway
- U.S. Route
- Urban Area
- Surface Water

Enclosure 2: Programmatic Agreement

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

August 2000

Whereas the United States Army (Army) is responsible for implementation of applicable provisions of the Defense Base Closure and Realignment Act of 1990 (P.L. 101-510) as amended, and is proceeding with the closure of Savanna Army Depot Activity (SVDA), and consequent disposal of excess and lus property in a manner consistent with the requirements of the applicable Defense Base Closure and Realignment Commission recommendation; and

Whereas the Army has determined that leasing, 1 ensing and/or disposal of all or portions of S'\,'DA, in Illinois, may have an effect upon historic properties that have been designated as eligible for listing in, the National Register of Historic Places, and has consulted with the Illinois State Historic Preservation Officer (SHPO), and the Advisory Council on Historic Preservation (Council) pursuant to 36 C.F.R. Part 800, regulations implementing Section 106 of the National Historic Preservation Act (16 U.S.C. Section 470(f), Section ll0(f) of the same Act (16 U.S.C. Section 470h-2[f]), and Section 111 of the same Act (16 U.S.C. Section 470h-3); and

Whereas after real estate screening activities were conducted it was determined that S\J'DA surplus lands will be divided between the U.S. Fish and Wildlife Service, the U.S. Army Corps of Engineers, the Illinois Department of Natural Resources, and the Jo Carroll Depot Local Reuse Authority; and

Whereas the Army will conduct cultural resource inventory activities only for those lands to be transferred to non-fede entities; and

Whereas the Army has completed a number of historic architectural and archeological surveys (listed in Attachment A) to support

disposal of portions of the BRAC property to non-federal entities; and

Whereas none of the SVDA buildings to be conveyed to non-federal entities, examined by the 1997 architectural inventory study, were determined to be eligible for the National Register of Historic Places; and

Whereas a number of archeological sites located within those SVDA BRAC excess lands scheduled for disposal to non-federal entities have been determined to be eligible or potentially eligible for the National Register of Historic Places (listed in Attachment B); and

Whereas not all BRAC lands to be disposed of to non-federal entities can be surveyed for archeological resources until the lands have been examined for and, if necessary, cleared of unexploded ordnance (UXO); and

Whereas interested members of the public, including the Jo Carroll Depot Local Redevelopment Authority, and Native Americans, have been provided opportunities to comment on the effects this base closure may have on historic properties at SVDA through public hearings, consultation meetings, and other means; and

Whereas in carrying out the disposal of excess and surplus property the Army will comply with all applicable laws and regulations, including 36 C.F.R. Part 79, Curation of Federally-Owned and Administered Archeological Collections;

Whereas the Jo Carroll Depot Local Redevelopment Authority has been invited to concur in this agreement document; and

NOW, THEREFORE, the Army, the SHPO, and the Council agree that the undertaking described above shall be implemented in accordance with the following stipulations to take into account the effect of the undertaking on historic properties.

STIPULATIONS - The Army will ensure that the following measures are carried out:

I. Identification and Evaluation

A. The Army will conduct Phase I archeological site location surveys for those SVDA lands that are to be transferred to non-federal entities and that have not been previously surveyed for archeological resources (Appendix C map

displays those SVDA lands that will be surveyed for archeological resources).

B. For lands that must be examined for potential UXO contamination, archeological surveys will be conducted only after the area has been examined for UXO and has been determined as being safe for subsurface archeological testing. Due to explosive ordnance qualification requirements and safety factors, no archeologists will be made part of the actual UXO field survey and disposal teams. However, archeologists associated with the UXO contractor and the U.S. Army Corps of Engineers (USACE) will be available for consultations and to examine any archeological finds that may be made in the course of the UXO investigations. The following procedures will be followed by the UXO disposal teams that will conduct the UXO surveys.

1. Prior to the initiation of field investigations at SVDA, UXO survey personnel will receive a cultural resources orientation concerning known cultural resource sites within the project area and recognition of cultural resource artifactual materials that could be encountered by the UXO investigations.

2. UXO surveys will involve location of metallic objects by metal detectors and hand excavation of these metallic objects by UXO disposal experts. Non UXO related metallic objects and any other cultural items encountered by the investigators will be left on the ground surface adjacent to the hole from which they were removed for later examination and, if appropriate, collection during subsequent archeological surveys.

3. UXO field survey personnel will notify the SVDA BRAC Environmental Coordinator (BEC) and the contract or USACE archeologist of any cultural materials or human skeletal materials encountered during the UXO investigations. If human skeletal remains are encountered, UXO investigations will be immediately halted for that sampling grid and the SVDA BEC and USACE archeologist will make arrangements to determine the origin of the human remains and whether the requirements of the Native American Graves Protection and Repatriation Act (NAGPRA) should be enacted.

4. UXO related items encountered by the UXO disposal experts may be removed from the location where they are encountered for disposal or may be exploded *in situ*, if removal is considered to be too hazardous.

C. The Army will coordinate the findings and recommendations for all SVDA archeological surveys with the Illinois SHPO as the survey reports are completed.

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.

III. Licenses and Leases

Licenses or leases, to other than federal agencies, of historic properties will include language provided in Attachment D of this agreement as appropriate.

IV. Disposal of SVDA Properties

A. Transfer of Real Property That Does Not Contain Historic Properties

In leasing or disposing of real property and improvements--for which identification and evaluation have been completed in consultation with the SHPO--that do not contain historic properties, any portion of an historic property, archeological sites, or any portion of an archeological site, no further action is necessary under this agreement. The Army will, however, promptly notify the SHPO that such a transfer has been completed.

B. Assignments to Other Federal Agencies

In assigning historic property (ies) directly to another Federal agency by a transfer authority such as The Federal Property and Administrative Services Act of 1949, as amended (40 U.S.C. § 471 et seq.), the receiving Federal agency will be deemed responsible for compliance with 36 C.F.R. Part 800 and any other applicable state or Federal laws and regulations with respect to the maintenance and disposal of these properties. The Army will promptly notify the SHPO and Council in writing of each Federal agency that has requested and been assigned such property.

C. Public Benefit Conveyances to Non-Federal Recipients

In disposing of historic property(ies) directly to a non-Federal recipient - at the request of a sponsoring Federal agency, and pursuant to the Public Benefit Conveyance authorities contained in the Federal Property and Administrative Services Act of 1949, as amended (40 U.S.C. § 471 et seq.), and other applicable authorities - an appropriate preservation covenant (found at Attachment E) will be incorporated in the transfer instrument(s). The Army will promptly notify the SHPO and Council in writing of each such transfer of an archeological-site property.

D. Economic Development Conveyances to LRAs

In disposing of historic property(ies) to a Local Redevelopment Authority (LRA) pursuant to the Economic Development Conveyance authority contained in the Defense Base Closure and Realignment Act of 1990 (Public Law 101-510, as amended), an appropriate preservation covenant (found at Attachment E) will be incorporated in the transfer instrument(s). The Army will promptly notify the SHPO and Council in writing of each such transfer of an archeological-site property.

E. Competitive Sales

In disposing of historic properties via a competitive sale transfer authority, the Army's bid solicitation will contain the following information:

(1) Information on the property's archeological significance, identifying elements, or other characteristics of the property that should be given special consideration in planning;

(2) Information on financial incentives for preservation of archeological properties;

(3) Information indicating that an appropriate preservation covenant will be incorporated in the instrument transferring title to the property, and that this covenant will be substantively identical to the one contained in Attachment E of this agreement (as appropriate), unless modifications are authorized pursuant to the process described in paragraph IV. G, below, and as required to accord the covenants with state law.

In developing the above information for inclusion in its initial bid solicitation document, the Army will solicit the advice and

assistance of the SHPO. The Army need not solicit such advice and assistance in preparing subsequent solicitation documents, unless such documents contain historic properties information that materially differs from that included in the initial solicitation document. The Army will notify the SHPO and Council in writing of each such transfer of an archeological-site property.

F. Negotiated Sales

In disposing of historic properties via a negotiated sale transfer authority, the Army will provide a written document ("negotiation document") to the negotiating party that sets forth the same information described in subparagraphs IV. E (1), (2) & (3), above. In developing this information for inclusion in the negotiation document to be provided to the initial negotiating party, the Army will solicit the advice and assistance of the SHPO. The Army need not solicit such advice and assistance in preparing negotiation documents for subsequent negotiating parties, unless such documents contain historic properties information that materially differs from that included in the document provided to the initial negotiating party. The Army will notify the SHPO and Council in writing of each such transfer of an archeological-site property.

G. Covenant Modification to Facilitate Transfer

If the Army cannot transfer the property or properties that contain National Register eligible archeological sites pursuant to the provisions set forth in paragraphs IV. C, D, E, and F above, then the Army will consult with the SHPO, the Council, and (with respect to transfers pursuant to paragraphs IV. C, D, and F) the prospective transferee(s) to determine appropriate modifications to the preservation covenant contained in Attachment E that are necessary in order to complete transfer of the property(ies) within established disposal timelines. Such modifications shall be limited to those that are reasonably necessary in order to effect transfer of, or effectively market, the concerned property within established timelines.

V. Environmental Remediation

A. UXO identification and removal will be handled as described in Stipulation I.B of this agreement document. As they are developed, the plans for other proposed environmental remediation activities will be reviewed by the SVDA BRAC Environmental Coordinator (BEC) to identify any effects to historic properties, known or yet to be discovered. If the Army determines that a proposed remediation activity will take place

less than 100 feet from a historic property and has the potential to affect that property, the Army will consult with the SHPO to determine what steps, if any, should be taken with respect to those effects.

B. Proposed remediation plans that the Army determines may affect historic properties will be submitted to the SHPO for review and comment in accordance with the following procedures:

(1) Proposed remediation plans or supplemental documentation furnished by the Army will provide descriptions of any potential conflicts between remediation and preservation of historic properties;

(2) In situations where the Army determines that there is an immediate threat to human health, safety, or the environment, and that remediation must proceed without first taking steps to preserve historic properties, then the Army's reasons for so determining will be fully described;

(3) In situations where the Army determines that there is not an immediate threat to human health, safety, or the environment, and that implementation of its proposed remediation plan will result in the destruction or substantial alteration of any historic property, then the Army shall either modify its remediation plan to avoid the adverse effect or implement data recovery and/or recordation in consultation with the SHPO, taking into account health and safety constraints inherent in properties containing hazardous materials, resource availability, and any other relevant constraints.

VI. Anti-Deficiency Act

The stipulations of this agreement are subject to the provisions of the Anti-Deficiency Act. If compliance with the Anti-Deficiency Act alters or impairs the Army's ability to implement the stipulations of this agreement, the Army will consult in accordance with the amendment and termination procedures found at Sections IX. and X. of this agreement.

VII. Status Reports

Until such time as all SVDA archeological properties have been transferred from Army control in accordance with the terms of this agreement, the Army will provide an annual status report

to the Council and Illinois SHPO to review implementation of the terms of this agreement and to determine whether amendments are needed. If amendments are needed, the signatories to this agreement will consult, in accordance with Stipulation IX. of this agreement, to make such revisions.

VIII. Dispute Resolution

A. Should the Illinois SHPO and/or the Council object within thirty (30) days to any plans or other documents provided by the Army or others for review pursuant to this agreement, or to any actions proposed or initiated by the Army pursuant to this agreement, the Army shall consult with the objecting party to resolve the objection. If the Army determines that the objection cannot be resolved, the Army shall forward all documentation relevant to the dispute to the Council. Within thirty (30) days after receipt of all pertinent documentation, the Council will either:

(1) Provide the Army with recommendations, which the Army will take into account in reaching a final decision regarding the dispute; or

(2) Notify the Army that it will comment pursuant to 36 C.F.R. 800.7(c), and proceed to comment.

Any Council comment will be taken into account by the Army in accordance with 36 C.F.R. 800.7(c)(4) with reference to the subject of the dispute.

B. Any recommendations or comment provided by the Council pursuant to Stipulation VIII. A above will pertain only to the subject of the dispute; the Army's responsibility to carry out all other actions under this agreement that are not the subjects of the dispute will remain unchanged.

C. At any time during implementation of the measures stipulated in this agreement by the Army, if an objection to any such measure or its manner of implementation is raised by interested persons, then the Army shall consider the objection and consult, as appropriate, with the objecting party, the SHPO, and the Council to attempt to resolve the objection.

IX. Amendments

A. The Army, Illnois SHPO, and/or Council may request that this PA be revised, whereby the parties will consult to consider whether such revision is necessary.

B. If it is determined that revisions to this PA are necessary, then the Army, the Council, and the SHPO shall consult pursuant to 36 C.F.R. 800.6(c)(7), as appropriate, to make such revisions. Except that, reviewing parties must comment on, or signify their acceptance of, the proposed changes to the PA in writing within 30 days of their receipt.

X. Termination of Agreement

A. The Army, Illnois SHPO, and/or Council may terminate this PA by providing thirty (30) days written notice to the other signatory parties. During the period after notification and prior to termination the Army, the Council, and the SHPO will consult to seek agreement on amendments or other actions that would avoid termination. In the event of termination, the Army will comply with 36 CFR Part 800.6(c)(8) with regard to individual undertakings associated with the BRAC disposal action.

Execution and implementation of this PA evidences that the Army has afforded the Council a reasonable opportunity to comment on the closure and disposal of excess and surplus property at SVDA, and that the Army has taken into account the effects of the undertaking on historic properties. Execution and compliance with this programmatic agreement fulfills the Army's Section 106 responsibilities regarding the closure and disposal of Savanna Army Depot Activity.

DEPARTMENT OF THE ARMY

By: Charles S. Mahan Jr. Date: 21 August 2000
Charles S. Mahan, Jr.
Major General, USA
Chief of Staff

ILLINOIS STATE HISTORIC PRESERVATION OFFICER

By: _____ Date: 9-20-00
Anne Haaker
Deputy State Historic Preservation Officer

ADVISORY COUNCIL ON HISTORIC PRESERVATION

By: John M. Fowler Date: 10/13/00
John Fowler
Executive Director

Concur:

JO CARROLL DEPOT LOCAL REDEVELOPMENT AUTHORITY

By: _____ Date: 9-25-00
John A. Morehead
Executive Director

ATTACHMENT A

Bibliography of Cultural Resource Studies Conducted to Support BRAC Disposal of Savanna Army Depot Activity Properties

Ball, Donald B.
1997 *A Cultural Resources Reconnaissance of A Proposed 164 Acre Prison Site, Savanna Army Depot Activity, Jo Daviess County, Illinois*. Report prepared by the U.S. Army Corps of Engineers, Louisville District.

Hardlines
1997 *Architectural Inventory of a Portion of the Savanna Army Depot Activity, Carroll and Jo Daviess Counties, Illinois*. A report prepared for the U.S. Army Corps of Engineers, Louisville District by Hardlines: Design and Delineation, a subcontractor of International Technology, Inc.

Miller, Orloff G., Sarah Adams, and E. Jeanne Harris
1999 *Phase I Archaeological Survey of ca. 212 Acres (85.8 hectares) at the Savanna Army Depot Activity, Carroll County Illinois*. A report prepared for the U.S. Army Corps of Engineers, Louisville District by Gray and Pape, Inc.

Whitman, Linda G. and Nathan Young
1998 *Phase I Literature Review and Archaeological Cultural Resource Survey of 210 Acres (85 ha) at Savanna Army Depot Activity, Carroll County, Illinois*. A report prepared for the U.S. Army Corps of Engineers, Louisville District by ASC Group, Inc., a subcontractor of the IT Corporation.

ATTACHMENT B

Savanna Army Depot Activity, Illinois
Known Historic Properties on or Eligible for
the National Register of Historic Places
that will be Disposed of to Non-Federal Entities

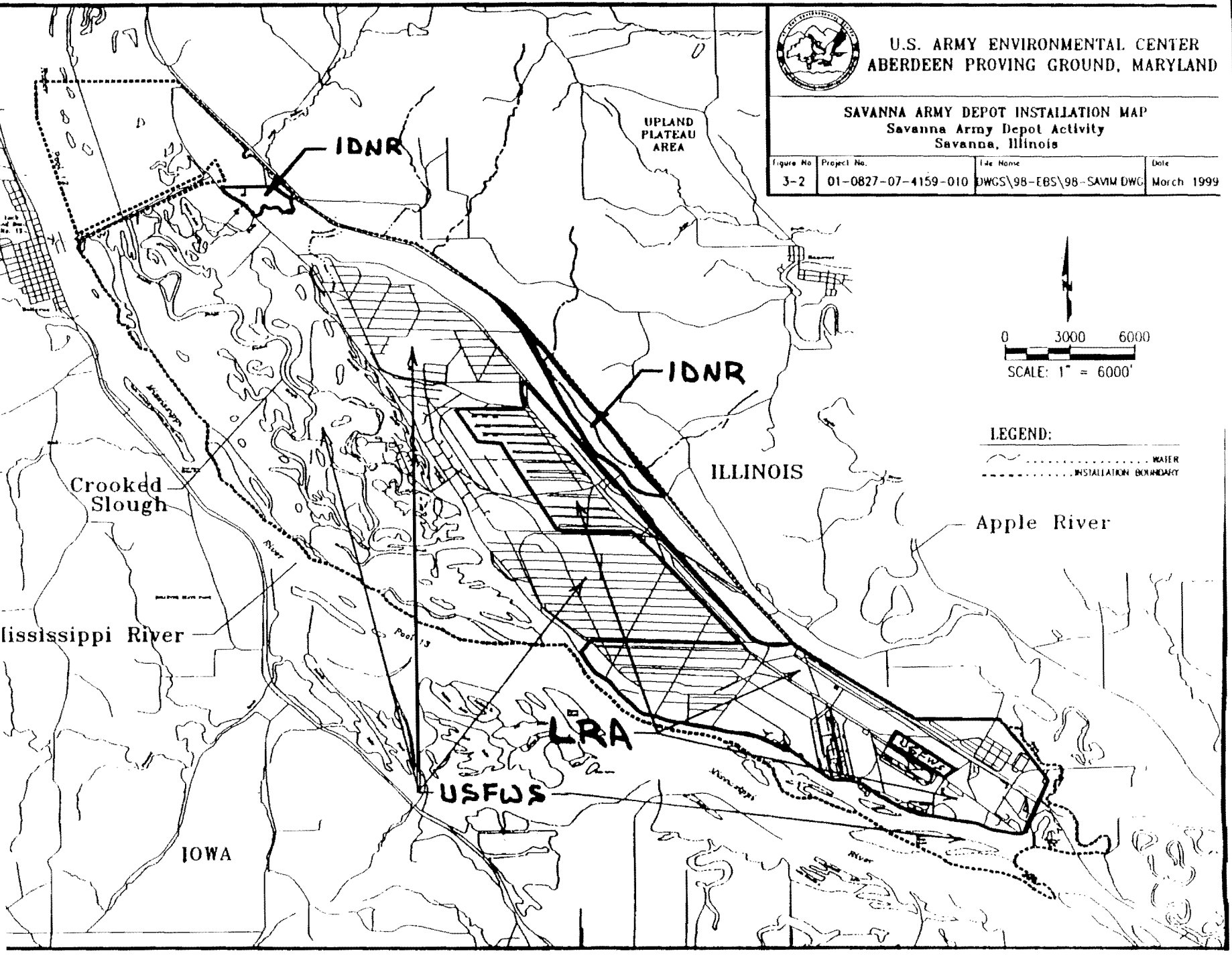
11CA1*
11CA2
11CA3+
11CA139*
11CA142
11CA143*
11CA147
11CA148
11CA149

* Lands making up this archeological site lie within two BRAC disposal parcels, one to be acquired by the local reuse authority and the other by the U.S. Fish and Wildlife Service.

+ The mounds formerly associated with this site have been destroyed, but the site may still have the potential to possess subsurface burials.

ATTACHMMENT C

Map Displaying the Location of
Savanna Army Depot Activity Lands to be
Transferred to Federal and
Non-Federal Entities


U.S. ARMY ENVIRONMENTAL CENTER
ABERDEEN PROVING GROUND, MARYLAND
SAVANNA ARMY DEPOT INSTALLATION MAP
Savanna Army Depot Activity
Savanna, Illinois
Figure No 3-2
Project No. 01-0827-07-4159-010
File Name DWGS\98-EBS\98-SAVIM.DWG
Date March 1999
IDNR
UPLAND PLATEAU AREA
IDNR
ILLINOIS
Crooked Slough
Apple River
lississippi River
Pool 13
LRA
USFWS
IOWA
0 3000 6000
SCALE: 1" = 6000'
LEGEND:
WATER
INSTALLATION BOUNDARY

ATTACHMENT D - **Language to be included in lease and license agreements when archeological sites are present.**

Archeological Property(ies) Lessee (License) Language

Archeological property(ies)XXX is/are (eligible for inclusion in/listed in) the National Register of Historic Places. The Lessee (Licensee) shall ensure that the property(ies) remain(s) undisturbed. The Lessee (Licensee) will notify the Army of any proposed ground disturbance to the archeological property prior to undertaking said ground disturbance. Notification will include a detailed description of the proposed undertaking. If the Army does not object to the proposal within 30 days of receipt of such notification and adequate supporting documentation, the Army will, with the assistance of the Lessee (Licensee), initiate consultation with the Illinois SHPO in accordance with Section 106 of the National Historic Preservation Act and its implementing regulations, "Protection of Historic Properties" (36 C.F.R. Part 800). The Lessee (Licensee) will not undertake the proposed action until the Army notifies the Lessee (Licensee) that the requirements of Section 106 have been fulfilled and the Lessee (Licensee) may proceed. If the Army objects to the Lessee's (Licensee's) proposed ground disturbance, the Lessee shall not undertake the proposed action.

ATTACHMENT E: STANDARD PRESERVATION COVENANT FOR CONVEYANCE OF PROPERTY THAT INCLUDES ARCHEOLOGICAL SITES

1. In consideration of the conveyance of the real property that includes the [official number(s) designation of archeological site(s)] located in the County of [name of county], Illinois, which is more fully described as [insert legal description], [Name of property recipient] hereby covenants on behalf of [himself/herself/itself], [his/her/its] heirs, successors, and assigns at all times to the Illinois State Historic Preservation Officer (SHPO), to maintain and preserve [official number(s) designation of archeological site(s)], in accordance with the provisions of paragraphs 2 through 11 of this covenant.

2. (Name of property recipient) will notify the Illinois SHPO in writing prior to undertaking any disturbance of the ground surface or any other action on [official number(s) designation of archeological site(s)] that would affect the physical integrity of this/these site(s). Such notice shall describe in reasonable detail the proposed undertaking and its expected effect on the physical integrity of [official number(s) designation of archeological site(s)].

3. Within thirty (30) calendar days of the Illinois SHPO's receipt of notification provided by (name of property recipient) pursuant to paragraph 2 of this covenant, the SHPO will respond to (name of property recipient) in writing as follows:

(a) That (name of property recipient) may proceed with the proposed undertaking without further consultation; or

(b) That (name of property recipient) must initiate and complete consultation with the Illinois SHPO before (he/she/it) can proceed with the proposed undertaking.

If the Illinois SHPO fails to respond to the (name of property recipient)'s written notice within thirty (30) calendar days of the SHPO's receipt of the same, then (name of property recipient) may proceed with the proposed undertaking without further consultation with the SHPO.

4. If the response provided to (name of property recipient) by the Illinois SHPO pursuant to paragraph 3 of this covenant requires consultation with the SHPO, then both parties will so consult in good faith to arrive at mutually-agreeable and appropriate measures that (name of property recipient) will employ to mitigate any adverse effects associated with the proposed undertaking. If the parties are unable to arrive at such mutually-agreeable mitigation measures, then (name of property recipient) shall, at a minimum, undertake recordation

for the concerned property--in accordance with the Secretary of Interior's standards for recordation and any applicable state standards for recordation, or in accordance with such other standards to which the parties may mutually agree--prior to proceeding with the proposed undertaking. Pursuant to this covenant, any mitigation measures to which (name of property recipient) and the SHPO mutually agree, or any recordation that may be required, shall be carried out solely at the expense of (name of property recipient).

5. [Name of recipient] shall make every reasonable effort to prohibit any person from vandalizing or otherwise disturbing any archeological site determined by the Illinois SHPO to be eligible for inclusion in the National Register of Historic Places. Any such vandalization or disturbance shall be promptly reported to the Illinois SHPO.

6. The Illinois SHPO shall be permitted at all reasonable time to inspect [parcel designation] in order to ascertain its condition and to fulfill its responsibilities hereunder.

7. In the event of a violation of this covenant, and in addition to any remedy now or hereafter provided by law, the Illinois SHPO may, following reasonable notice to [name of recipient], institute suit to enjoin said violation or to require the restoration of any archeological site affected by such violation.

8. [Name of recipient] agrees that the Illinois SHPO may, at its discretion, after 30 days notice to [name of recipient], convey and assign all or part of its rights and responsibilities contained in this covenant to a third party.

9. This covenant is binding on [name of recipient], [his/her/its] heirs, successors, and assigns in perpetuity. Restrictions, stipulations, and covenants contained herein shall be inserted by [name of recipient] verbatim or by express reference in any deed or other legal instrument by which [he/she/it] divests [himself/herself/itself] of either the fee simple title or any other lesser estate in [parcel designation] or any part thereof.

10. The failure of the Illinois SHPO to exercise any right or remedy granted under this instrument shall not have the effect of waiving or limiting the exercise of any other right or remedy or the use of such right or remedy at any other time.

11. The covenant shall be a binding servitude upon the real property that includes [official number(s) designation of archeological site(s)] and shall be deemed to run with the land. Execution of this covenant shall constitute conclusive evidence

that [name of recipient] agrees to be bound by the foregoing conditions and restrictions and to perform the obligations herein set forth.

Enclosure 3: Site Map



LEGEND

D Parcel Boundary

Note: Boundaries are approximate.

Enclosure 4: Preservation Covenant

PRESERVATION COVENANT
SVADA LRA Parcel 20

(held by Illinois Department of Natural Resources)

In consideration of the conveyance of certain real property, hereinafter referred to as the

SVADA LRA Parcel 20, located in Carroll County, Illinois, which is more fully describes as:

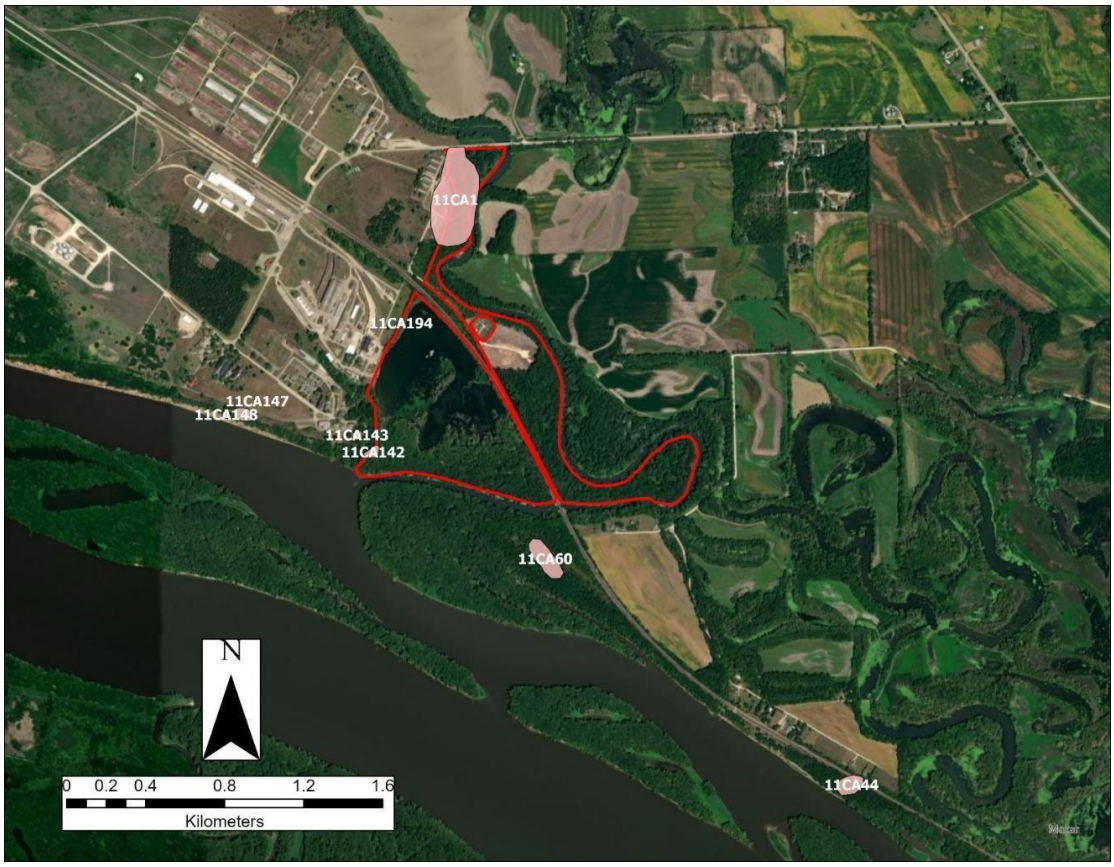
The Savanna Army Depot Activity (SVADA) local redevelopment authority (LRA) Parcel 20 at the southern end of SVADA in Carroll County, Illinois. The parcel is bounded by the Apple River to the east and south; the Mississippi River to the west; Vincent Road and Rofsteck Road to the northwest; and Crim Road to the north. The parcel is bisected from the northwest to the southeast by an active railroad line owned by the Burlington Northern Santa Fe Railway Company; the rail line is not part of the parcel to be transferred. A sewage treatment plant owned by the U.S. Army is surrounded by LRA Parcel 20, also is not part of the parcel to be transferred (Figure 1).

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.
3. Additional archaeological testing, NRHP site evaluations, and potential mitigation measures require additional Illinois SHPO consultation and Section 106 of the National Historic Preservation Act (NHPA) compliance measures, as required by law.
4. Execution of this Covenant shall include all applicable conditions, restrictions, laws, orders, and obligations set forth in the SVADA Programmatic Agreement (PA).
5. Conveyance of property that includes archaeological sites:
    a. In consideration of the conveyance of the real property, LRA Parcel 20, which includes the sites 11-CA-1 and 11-CA-142 located in Carroll County, Illinois. Jo-Carroll Depot LRA covenants on behalf of itself, its heirs, or successors, and assigns at all times to the Illinois SHPO to maintain and preserve sites 11-CA-1 and 11-CA-142, in accordance with the provisions of this Covenant.
    b. The property recipient will notify the Illinois SHPO in writing prior to any undertaking of any ground disturbance or action on sites that would affect the physical integrity of sites 11-CA-1 and 11-CA-142. Such a notice shall describe in reasonable detail the proposed undertaking and its expected effect on the physical integrity of sites 11-CA-1 and 11-CA-142.

c. Within thirty (30) calendar days of the Illinois SHPO's receipt of notification provided by the LRA, pursuant to this Covenant, the SHPO will respond to the LRA in writing as follows:
    i. That the LRA may proceed with the proposed undertaking without further consultation; or
    ii. That the LRA must initiate and complete additional consultation with the Illinois SHPO before it can proceed with the proposed undertaking; or
    iii. If the Illinois SHPO fails to respond to the LRA's written notice within thirty (30) calendar days of the SHPO's receipt of the same, then the LRA may proceed with the proposed undertaking without further consultation with the SHPO.
d. Lease and License:
    i. Archaeological sites 11-CA-1 and 11-CA-142 are potentially eligible for inclusion in the NRHP.
    ii. The Recipient/Lessee shall ensure that the sites remain undisturbed.
    iii. The Recipient/Lessee will notify the Owner of any proposed ground disturbance to the archaeological sites prior to undertaking said ground disturbance.
    iv. Notification will include a detailed description of the proposed undertaking.
    v. If the Army does not object to the proposal within thirty (30) calendar days of receipt of such notification and adequate supporting documentation, the Army will, with the assistance of the Lessee (Licensee), initiate consultation with Illinois SHPO in accordance with NHPA Section 106 and its implementing regulations, "Protection of Historic Properties" (Title 36of the Code of Federal Regulations Part 800).
    vi. The Recipient/Lessee will not undertake the proposed action until the Army notifies the Lessee (Licensee) that the requirements of Section 106 have been fulfilled and the Lessee (Licensee) may proceed.
    vii. If the Army objects to the Recipient's/Lessee's proposed ground disturbance, the Recipient/Lessee shall not undertake the proposed action.
e. The Illinois Department of Natural Resources shall be permitted at all reasonable times to inspect these archaeological sites to ascertain if the above conditions are being observed.
f. In the event of a violation of this Covenant, and in addition to any remedy now or hereafter provided by law, the Illinois Department of Natural Resources may, following reasonable notice to the Owner and Recipient/Lessee, institute suit to enjoin said violation or to require the restoration or mitigation of natural resources, archaeological sites, or structures disturbed by construction, alteration, or disturbance of the ground surface, or structure older than 50 years.
g. The Owner and Recipient/Lessee agrees that the Illinois Department of Natural Resources may at its discretion, without prior written notice to the Owner and Recipient/Lessee, convey and assign all or part of its rights and responsibilities contained herein to a third party.
h. This Covenant is binding on the Owner and Recipient/Lessee, and their successors and assignees in perpetuity. Restrictions, stipulations, and covenants contained herein shall be inserted by Owner and Recipient/Lessee verbatim or by express reference in any deed or other legal instrument by which it divests itself or either the fee simple title or any other lesser estate in this SVADA LRA Parcel 20 or any part thereof.
i. The failure of the Illinois Department of Natural Resources to exercise any right or remedy granted under this instrument shall not have the effect of waiving or limiting the exercise of any other right or remedy or the use of such right or remedy at any other time.

Enclosure 5: Archaeological Sites Directly and Indirectly Effected by the Army's Disposal of LRA Parcel 20



Enclosure 6: A Summary of the Archaeological Sites Directly And Indirectly Effected by the Army's Disposal of LRA Parcel 20

Site Number	Time Period	Site Type	NHPA Eligible	HRPA	Survey Date
11CA1	Mississippian with smaller Woodland and 19th-20th century components	Habitation	Potentially	No	1932, 1997, 1998, and 2020
11CA44	Late Woodland	Mounds and Town	Potentially	Yes	1974, 1989, and 1994
11CA60	Mississippian	Habitation	Not assessed	No	1974
11CA142	Woodland with smaller Mississippian and historic components	Habitation	Potentially	No	1998 and 2020
11CA143	Late Woodland	Habitation	Further review	No	1998
11CA147	Woodland	Habitation	Further review	No	1998
11CA148	Woodland	Habitation	Further review	No	1998

Enclosure 7: Illinois SHPO Phase I Review Letter, SHPO Log #005022420

ILLINOIS DEPARTMENT OF NATURAL RESOURCES

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

Carroll County
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

PLEASE REFER TO: SHPO Log #005022420

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

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

February 26, 2025

SUBJECT: Additional Coordination regarding Cultural Resources 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

Ms. Susan Tiger, NAGPRA Representative
Kickapoo Tribe of Oklahoma
105365 S. Hwy 102
McLoud, OK 74851

Dear Ms. Tiger:

The U.S. Army (Army) is initiating additional coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject environmental impact statement (EIS). The Army will prepare the EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) or other appropriate recipient and (2) the potential effects of the LRA's or other recipient's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 EIS evaluated the closure, and the Depot was officially closed in 2000. Also in 2000, the *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* (2000 SVADA PA) (Enclosure 2, Programmatic Agreement) was executed in support of the 1997 EIS to ensure adequate consideration of the effect of the closure and disposal on historic properties.

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At this time, the Army is initiating additional coordination with you for the EIS to request any comments you might have in addition to those you provided in your previous correspondence. The project remains unchanged from the description presented for the 2023 and 2024 coordination. The remainder of this letter provides information on the project location, the proposed action, alternatives, and potential affected cultural resources.

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Since 2000, through the BRAC process, former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980. The Army has transferred these parcels to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the LRA. The Army has already transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west-northwest.

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Phase 1 could be implemented within a target 5-year completion window, while phases 2 and 3 could follow, with both having 5-year-plus completion windows. The LRA's proposed reuse includes activities outside the boundary of LRA Parcel 20 in the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island. All of the LRA's reuse phases would require dredging.

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If any sites are determined to be eligible for listing in the National Register of Historic Places (NRHP) through additional archaeological testing within LRA Parcel 20, cultural resources encumbrances in the form of preservation covenant will apply in perpetuity, as appropriate, based on the 2000 SVADA PA and in consultation with the Illinois State Historic Preservation Office (SHPO) under Section 106 of the NHPA. See the preservation covenant in Enclosure 4.

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LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2025.02.26 13:14:02 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

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600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

February 26, 2025

SUBJECT: Additional Coordination regarding Cultural Resources 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

Chairman Darwin Kaskaske
Kickapoo Tribe of Oklahoma
105365 S. Hwy 102
McLoud, OK 74851

Dear Chairman Kaskaske:

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BRAC Program Manager
HQDA/ODCS G-9

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February 26, 2025

SUBJECT: Additional Coordination regarding Cultural Resources 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

Mr. William Quackenbush, THPO
Ho-Chunk Nation of Wisconsin
W9814 Airport Rd.
Black River Falls, WI 54615

Dear Mr. Quackenbush:

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

President John Greendeer
Ho-Chunk Nation of Wisconsin
W9814 Airport Rd.
Black River Falls, WI 54615

Dear President Greendeer:

The U.S. Army (Army) is initiating additional coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject environmental impact statement (EIS). The Army will prepare the EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) or other appropriate recipient and (2) the potential effects of the LRA's or other recipient's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 EIS evaluated the closure, and the Depot was officially closed in 2000. Also in 2000, the *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* (2000 SVADA PA) (Enclosure 2, Programmatic Agreement) was executed in support of the 1997 EIS to ensure adequate consideration of the effect of the closure and disposal on historic properties.

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At this time, the Army is initiating additional coordination with you for the EIS to request any comments you might have in addition to those you provided in your previous correspondence. The project remains unchanged from the description presented for the 2023 and 2024 coordination. The remainder of this letter provides information on the project location, the proposed action, alternatives, and potential affected cultural resources.

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Since 2000, through the BRAC process, former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980. The Army has transferred these parcels to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the LRA. The Army has already transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west-northwest.

The LRA's finalized 2023 reuse plan for LRA Parcel 20 and additional information regarding the disposal and reuse of the parcel is available at Base Realignment and Closure (BRAC) > Great Lakes and Ohio River Division > Programs. In its plan, the LRA presents a conceptual reuse alternative to be implemented in three phases for developing LRA Parcel 20, which focuses on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development under each phase. To facilitate implementation, the LRA would implement the phases sequentially.

Phase 1 could be implemented within a target 5-year completion window, while phases 2 and 3 could follow, with both having 5-year-plus completion windows. The LRA's proposed reuse includes activities outside the boundary of LRA Parcel 20 in the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island. All of the LRA's reuse phases would require dredging.

In addition to the LRA's proposed reuse alternative, the EIS also will evaluate a recreation-only reuse alternative and a recreation and solar reuse alternative, which involve only the elements described in the LRA's 2023 reuse plan.

If any sites are determined to be eligible for listing in the National Register of Historic Places (NRHP) through additional archaeological testing within LRA Parcel 20, cultural resources encumbrances in the form of preservation covenant will apply in perpetuity, as appropriate, based on the 2000 SVADA PA and in consultation with the Illinois State Historic Preservation Office (SHPO) under Section 106 of the NHPA. See the preservation covenant in Enclosure 4.

The 2000 SVADA PA is still in effect. A complete Phase I archaeological survey of LRA Parcel 20 was conducted by Brockington Associates (Brockington) in 2020. LRA Parcel 20 has no known buildings, structures, or traditional cultural properties currently listed in the NRHP. Two archaeological sites within LRA Parcel 20 (sites 11-CA-1 and 11-CA-142) are identified as potentially eligible for listing in the NRHP, and a third site (Site 11-CA-194) is not eligible (Enclosure 5, Archaeological Sites Map; Enclosure 6, Summary of Archaeological Sites Table). Brockington provided the survey report to the Illinois SHPO on November 4, 2020. The SHPO responded in a letter dated December 24, 2020, that the project as proposed would have no adverse effect on the two potentially eligible sites and that Site 11-CA-194 is not eligible for listing in the NRHP, but that any plan modifications must include SHPO notification (Enclosure 7, SHPO letter dated December 24, 2020). Brockington finalized the *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois* in January 2021. In the finalized report, Brockington stated the portions of sites 11-CA-1 and 11-CA-142 located within LRA Parcel 20 were not NRHP-eligible, and, therefore, the disposal of the parcel would result in no adverse effects on any cultural resources. The authors noted that a complete eligibility statement for each site could not be made, however, because the Brockington survey remained within the bounds of LRA Parcel 20 and did not survey the portions of each site located outside the parcel.

In response to the LRA's 2023 reuse plan for LRA Parcel 20 and subsequent scoping comments on the upcoming EIS, the Army has included four additional potentially eligible archaeological sites (11-CA-44, 11-CA-143, 11-CA-147, and 11-CA-148) and one unassessed archaeological site (11-CA-60) outside LRA Parcel 20 as cultural resources that could be indirectly impacted by the Army's disposal of LRA Parcel 20 (Enclosure 5; Enclosure 6). While there are other cultural resources present within the APE for the proposed project, these resources were not included in the report because the Illinois SHPO determined the resources to be ineligible for the NRHP. The Army will include Site 11-CA-60 in the EIS, despite the Illinois SHPO having not assessed its eligibility, out of extreme caution relating to the potential effects of the proposed reuse alternatives to cultural resources. In addition, Site 11-CA-44, a Late Woodland mound and town site, is protected under the Illinois Human Remains Protection Act (Chapter 20 Illinois Compiled Statutes 3440). Sites 11-CA-44 and 11-CA-60 also are both located on land owned by USFWS that USACE has declared is Environmentally Sensitive due to the presence of archaeological resources.

If you have input regarding resources of concern to your Tribe or any questions concerning this BRAC action, contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter. The Draft EIS will be available for public review and comment at Base Realignment and Closure (BRAC) > Great Lakes and Ohio River Division > Programs following its publication later this year.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2025.02.26 13:14:02 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

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

February 26, 2025

SUBJECT: Additional Coordination regarding Cultural Resources 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

Ms. Melissa Wiatrolik, THPO
Little Traverse Bay Bands of Odawa Indians, Michigan
7500 Odawa Circle
Harbor Springs, MI 49740

Dear Ms. Wiatrolik:

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Thomas Lineer
BRAC Program Manager
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CEQ Unique Identifier: EISX-007-21-000-1729699335

Chairperson Regina Gasco-Bentley
Little Traverse Bay Bands of Odawa Indians, Michigan
7500 Odawa Circle
Harbor Springs, MI 49740

Dear Chairperson Gasco-Bentley:

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WASHINGTON, DC 20310-0600

February 26, 2025

SUBJECT: Additional Coordination regarding Cultural Resources 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

Mr. David Grignon, THPO
Menominee Indian Tribe of Wisconsin
W2908 Tribal Office Loop Rd.
Keshena, WI 54135

Dear Mr. Grignon:

The U.S. Army (Army) is initiating additional coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject environmental impact statement (EIS). The Army will prepare the EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) or other appropriate recipient and (2) the potential effects of the LRA's or other recipient's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 EIS evaluated the closure, and the Depot was officially closed in 2000. Also in 2000, the *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* (2000 SVADA PA) (Enclosure 2, Programmatic Agreement) was executed in support of the 1997 EIS to ensure adequate consideration of the effect of the closure and disposal on historic properties.

The Army originally initiated consultation with your office for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in November 2023 for the EA. Following completion of the draft EA, the Department of the Army Headquarters determined an EIS was required. The Army sent your Tribe an early coordination letter for the EIS in August 2024. Based on responses received during the EA scoping process and early coordination for the EIS, the Army also expanded the area of potential effects (APE) to include cultural resources and historic properties outside the parcel that could be impacted by the LRA's proposed reuse alternative.

At this time, the Army is initiating additional coordination with you for the EIS to request any comments you might have in addition to those you provided in your previous correspondence. The project remains unchanged from the description presented for the 2023 and 2024 coordination. The remainder of this letter provides information on the project location, the proposed action, alternatives, and potential affected cultural resources.

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Since 2000, through the BRAC process, former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980. The Army has transferred these parcels to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the LRA. The Army has already transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west-northwest.

The LRA's finalized 2023 reuse plan for LRA Parcel 20 and additional information regarding the disposal and reuse of the parcel is available at Base Realignment and Closure (BRAC) > Great Lakes and Ohio River Division > Programs. In its plan, the LRA presents a conceptual reuse alternative to be implemented in three phases for developing LRA Parcel 20, which focuses on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development under each phase. To facilitate implementation, the LRA would implement the phases sequentially.

Phase 1 could be implemented within a target 5-year completion window, while phases 2 and 3 could follow, with both having 5-year-plus completion windows. The LRA's proposed reuse includes activities outside the boundary of LRA Parcel 20 in the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island. All of the LRA's reuse phases would require dredging.

In addition to the LRA's proposed reuse alternative, the EIS also will evaluate a recreation-only reuse alternative and a recreation and solar reuse alternative, which involve only the elements described in the LRA's 2023 reuse plan.

If any sites are determined to be eligible for listing in the National Register of Historic Places (NRHP) through additional archaeological testing within LRA Parcel 20, cultural resources encumbrances in the form of preservation covenant will apply in perpetuity, as appropriate, based on the 2000 SVADA PA and in consultation with the Illinois State Historic Preservation Office (SHPO) under Section 106 of the NHPA. See the preservation covenant in Enclosure 4.

The 2000 SVADA PA is still in effect. A complete Phase I archaeological survey of LRA Parcel 20 was conducted by Brockington Associates (Brockington) in 2020. LRA Parcel 20 has no known buildings, structures, or traditional cultural properties currently listed in the NRHP. Two archaeological sites within LRA Parcel 20 (sites 11-CA-1 and 11-CA-142) are identified as potentially eligible for listing in the NRHP, and a third site (Site 11-CA-194) is not eligible (Enclosure 5, Archaeological Sites Map; Enclosure 6, Summary of Archaeological Sites Table). Brockington provided the survey report to the Illinois SHPO on November 4, 2020. The SHPO responded in a letter dated December 24, 2020, that the project as proposed would have no adverse effect on the two potentially eligible sites and that Site 11-CA-194 is not eligible for listing in the NRHP, but that any plan modifications must include SHPO notification (Enclosure 7, SHPO letter dated December 24, 2020). Brockington finalized the *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois* in January 2021. In the finalized report, Brockington stated the portions of sites 11-CA-1 and 11-CA-142 located within LRA Parcel 20 were not NRHP-eligible, and, therefore, the disposal of the parcel would result in no adverse effects on any cultural resources. The authors noted that a complete eligibility statement for each site could not be made, however, because the Brockington survey remained within the bounds of LRA Parcel 20 and did not survey the portions of each site located outside the parcel.

In response to the LRA's 2023 reuse plan for LRA Parcel 20 and subsequent scoping comments on the upcoming EIS, the Army has included four additional potentially eligible archaeological sites (11-CA-44, 11-CA-143, 11-CA-147, and 11-CA-148) and one unassessed archaeological site (11-CA-60) outside LRA Parcel 20 as cultural resources that could be indirectly impacted by the Army's disposal of LRA Parcel 20 (Enclosure 5; Enclosure 6). While there are other cultural resources present within the APE for the proposed project, these resources were not included in the report because the Illinois SHPO determined the resources to be ineligible for the NRHP. The Army will include Site 11-CA-60 in the EIS, despite the Illinois SHPO having not assessed its eligibility, out of extreme caution relating to the potential effects of the proposed reuse alternatives to cultural resources. In addition, Site 11-CA-44, a Late Woodland mound and town site, is protected under the Illinois Human Remains Protection Act (Chapter 20 Illinois Compiled Statutes 3440). Sites 11-CA-44 and 11-CA-60 also are both located on land owned by USFWS that USACE has declared is Environmentally Sensitive due to the presence of archaeological resources.

If you have input regarding resources of concern to your Tribe or any questions concerning this BRAC action, contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter. The Draft EIS will be available for public review and comment at Base Realignment and Closure (BRAC) > Great Lakes and Ohio River Division > Programs following its publication later this year.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2025.02.26 13:14:02 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
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Chairwoman Gena Kakkak
Menominee Indian Tribe of Wisconsin
W2908 Tribal Office Loop Rd.
Keshena, WI 54135

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

Mr. Logan York, THPO
Miami Tribe of Oklahoma
3410 P St. NW
Miami, OK 74354

Dear Mr. York:

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

February 26, 2025

SUBJECT: Additional Coordination regarding Cultural Resources 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

Chief Douglas Lankford
Miami Tribe of Oklahoma
3410 P St. NW
Miami, OK 74354

Dear Chief Lankford:

The U.S. Army (Army) is initiating additional coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject environmental impact statement (EIS). The Army will prepare the EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) or other appropriate recipient and (2) the potential effects of the LRA's or other recipient's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 EIS evaluated the closure, and the Depot was officially closed in 2000. Also in 2000, the *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* (2000 SVADA PA) (Enclosure 2, Programmatic Agreement) was executed in support of the 1997 EIS to ensure adequate consideration of the effect of the closure and disposal on historic properties.

The Army originally initiated consultation with your office for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in November 2023 for the EA. Following completion of the draft EA, the Department of the Army Headquarters determined an EIS was required. The Army sent your Tribe an early coordination letter for the EIS in August 2024. Based on responses received during the EA scoping process and early coordination for the EIS, the Army also expanded the area of potential effects (APE) to include cultural resources and historic properties outside the parcel that could be impacted by the LRA's proposed reuse alternative.

At this time, the Army is initiating additional coordination with you for the EIS to request any comments you might have in addition to those you provided in your previous correspondence. The project remains unchanged from the description presented for the 2023 and 2024 coordination. The remainder of this letter provides information on the project location, the proposed action, alternatives, and potential affected cultural resources.

The 132-acre parcel is undeveloped land in Carroll County, IL (Enclosure 3, Site Map). The parcel includes Commander's Pond (formerly known as Ordnance School Lake). The parcel is bordered on the east and south by the Apple River, a tributary of the Mississippi River; the Mississippi River on the southwest; Vincent Road and Rofsteck Road on the west; and Crim Road on the north. While these rivers and roads form the boundaries of the parcel, they are not part of it. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by the 132-acre parcel, also is not part of the parcel to be transferred.

Since 2000, through the BRAC process, former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980. The Army has transferred these parcels to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the LRA. The Army has already transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west-northwest.

The LRA's finalized 2023 reuse plan for LRA Parcel 20 and additional information regarding the disposal and reuse of the parcel is available at Base Realignment and Closure (BRAC) > Great Lakes and Ohio River Division > Programs. In its plan, the LRA presents a conceptual reuse alternative to be implemented in three phases for developing LRA Parcel 20, which focuses on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development under each phase. To facilitate implementation, the LRA would implement the phases sequentially.

Phase 1 could be implemented within a target 5-year completion window, while phases 2 and 3 could follow, with both having 5-year-plus completion windows. The LRA's proposed reuse includes activities outside the boundary of LRA Parcel 20 in the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island. All of the LRA's reuse phases would require dredging.

In addition to the LRA's proposed reuse alternative, the EIS also will evaluate a recreation-only reuse alternative and a recreation and solar reuse alternative, which involve only the elements described in the LRA's 2023 reuse plan.

If any sites are determined to be eligible for listing in the National Register of Historic Places (NRHP) through additional archaeological testing within LRA Parcel 20, cultural resources encumbrances in the form of preservation covenant will apply in perpetuity, as appropriate, based on the 2000 SVADA PA and in consultation with the Illinois State Historic Preservation Office (SHPO) under Section 106 of the NHPA. See the preservation covenant in Enclosure 4.

The 2000 SVADA PA is still in effect. A complete Phase I archaeological survey of LRA Parcel 20 was conducted by Brockington Associates (Brockington) in 2020. LRA Parcel 20 has no known buildings, structures, or traditional cultural properties currently listed in the NRHP. Two archaeological sites within LRA Parcel 20 (sites 11-CA-1 and 11-CA-142) are identified as potentially eligible for listing in the NRHP, and a third site (Site 11-CA-194) is not eligible (Enclosure 5, Archaeological Sites Map; Enclosure 6, Summary of Archaeological Sites Table). Brockington provided the survey report to the Illinois SHPO on November 4, 2020. The SHPO responded in a letter dated December 24, 2020, that the project as proposed would have no adverse effect on the two potentially eligible sites and that Site 11-CA-194 is not eligible for listing in the NRHP, but that any plan modifications must include SHPO notification (Enclosure 7, SHPO letter dated December 24, 2020). Brockington finalized the *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois* in January 2021. In the finalized report, Brockington stated the portions of sites 11-CA-1 and 11-CA-142 located within LRA Parcel 20 were not NRHP-eligible, and, therefore, the disposal of the parcel would result in no adverse effects on any cultural resources. The authors noted that a complete eligibility statement for each site could not be made, however, because the Brockington survey remained within the bounds of LRA Parcel 20 and did not survey the portions of each site located outside the parcel.

In response to the LRA's 2023 reuse plan for LRA Parcel 20 and subsequent scoping comments on the upcoming EIS, the Army has included four additional potentially eligible archaeological sites (11-CA-44, 11-CA-143, 11-CA-147, and 11-CA-148) and one unassessed archaeological site (11-CA-60) outside LRA Parcel 20 as cultural resources that could be indirectly impacted by the Army's disposal of LRA Parcel 20 (Enclosure 5; Enclosure 6). While there are other cultural resources present within the APE for the proposed project, these resources were not included in the report because the Illinois SHPO determined the resources to be ineligible for the NRHP. The Army will include Site 11-CA-60 in the EIS, despite the Illinois SHPO having not assessed its eligibility, out of extreme caution relating to the potential effects of the proposed reuse alternatives to cultural resources. In addition, Site 11-CA-44, a Late Woodland mound and town site, is protected under the Illinois Human Remains Protection Act (Chapter 20 Illinois Compiled Statutes 3440). Sites 11-CA-44 and 11-CA-60 also are both located on land owned by USFWS that USACE has declared is Environmentally Sensitive due to the presence of archaeological resources.

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Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2025.02.26 13:14:02 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

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

Dr. Andrea Hunter, Director and THPO, Historic Preservation Office
The Osage Nation
100 W. Main St., Historic Preservation Office
Pawhuska, OK 74056

Dear Dr. Hunter:

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Mr. Vern Jefferson, Chairman, Sac & Fox Tribe of the Mississippi in Iowa
Mr. Johnathon Buffalo, THPO, Sac & Fox Tribe of the Mississippi in Iowa
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DEPARTMENT OF THE ARMY
OFFICE OF THE DEPUTY CHIEF OF STAFF, G-9
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

February 26, 2025

SUBJECT: Additional Coordination regarding Cultural Resources 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

Chairperson Tiauna Carnes
Sac & Fox Nation of Missouri in Kansas and Nebraska
305 North Main St.
Reserve, KS 66434

Dear Chairperson Carnes:

The U.S. Army (Army) is initiating additional coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject environmental impact statement (EIS). The Army will prepare the EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) or other appropriate recipient and (2) the potential effects of the LRA's or other recipient's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 EIS evaluated the closure, and the Depot was officially closed in 2000. Also in 2000, the *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* (2000 SVADA PA) (Enclosure 2, Programmatic Agreement) was executed in support of the 1997 EIS to ensure adequate consideration of the effect of the closure and disposal on historic properties.

The Army originally initiated consultation with your office for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in November 2023 for the EA. Following completion of the draft EA, the Department of the Army Headquarters determined an EIS was required. The Army sent your Tribe an early coordination letter for the EIS in August 2024. Based on responses received during the EA scoping process and early coordination for the EIS, the Army also expanded the area of potential effects (APE) to include cultural resources and historic properties outside the parcel that could be impacted by the LRA's proposed reuse alternative.

At this time, the Army is initiating additional coordination with you for the EIS to request any comments you might have in addition to those you provided in your previous correspondence. The project remains unchanged from the description presented for the 2023 and 2024 coordination. The remainder of this letter provides information on the project location, the proposed action, alternatives, and potential affected cultural resources.

The 132-acre parcel is undeveloped land in Carroll County, IL (Enclosure 3, Site Map). The parcel includes Commander's Pond (formerly known as Ordnance School Lake). The parcel is bordered on the east and south by the Apple River, a tributary of the Mississippi River; the Mississippi River on the southwest; Vincent Road and Rofsteck Road on the west; and Crim Road on the north. While these rivers and roads form the boundaries of the parcel, they are not part of it. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by the 132-acre parcel, also is not part of the parcel to be transferred.

Since 2000, through the BRAC process, former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980. The Army has transferred these parcels to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the LRA. The Army has already transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west-northwest.

The LRA's finalized 2023 reuse plan for LRA Parcel 20 and additional information regarding the disposal and reuse of the parcel is available at Base Realignment and Closure (BRAC) > Great Lakes and Ohio River Division > Programs. In its plan, the LRA presents a conceptual reuse alternative to be implemented in three phases for developing LRA Parcel 20, which focuses on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development under each phase. To facilitate implementation, the LRA would implement the phases sequentially.

Phase 1 could be implemented within a target 5-year completion window, while phases 2 and 3 could follow, with both having 5-year-plus completion windows. The LRA's proposed reuse includes activities outside the boundary of LRA Parcel 20 in the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island. All of the LRA's reuse phases would require dredging.

In addition to the LRA's proposed reuse alternative, the EIS also will evaluate a recreation-only reuse alternative and a recreation and solar reuse alternative, which involve only the elements described in the LRA's 2023 reuse plan.

If any sites are determined to be eligible for listing in the National Register of Historic Places (NRHP) through additional archaeological testing within LRA Parcel 20, cultural resources encumbrances in the form of preservation covenant will apply in perpetuity, as appropriate, based on the 2000 SVADA PA and in consultation with the Illinois State Historic Preservation Office (SHPO) under Section 106 of the NHPA. See the preservation covenant in Enclosure 4.

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In response to the LRA's 2023 reuse plan for LRA Parcel 20 and subsequent scoping comments on the upcoming EIS, the Army has included four additional potentially eligible archaeological sites (11-CA-44, 11-CA-143, 11-CA-147, and 11-CA-148) and one unassessed archaeological site (11-CA-60) outside LRA Parcel 20 as cultural resources that could be indirectly impacted by the Army's disposal of LRA Parcel 20 (Enclosure 5; Enclosure 6). While there are other cultural resources present within the APE for the proposed project, these resources were not included in the report because the Illinois SHPO determined the resources to be ineligible for the NRHP. The Army will include Site 11-CA-60 in the EIS, despite the Illinois SHPO having not assessed its eligibility, out of extreme caution relating to the potential effects of the proposed reuse alternatives to cultural resources. In addition, Site 11-CA-44, a Late Woodland mound and town site, is protected under the Illinois Human Remains Protection Act (Chapter 20 Illinois Compiled Statutes 3440). Sites 11-CA-44 and 11-CA-60 also are both located on land owned by USFWS that USACE has declared is Environmentally Sensitive due to the presence of archaeological resources.

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LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2025.02.26 13:14:02 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

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Ms. Sandra Massey, THPO
Sac & Fox Nation, Oklahoma
920963 South Highway 99, Administration Bldg.
Stroud, OK 74079

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920963 South Highway 99, Administration Bldg.
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Dr. Andrea Hunter, Director and THPO, Historic Preservation Office, The Osage Nation
Mr. Geoffrey Standing Bear, Principal Chief, The Osage Nation
Ms. Tiauna Carnes, Chairperson, Sac & Fox Nation of Missouri in Kansas and Nebraska
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Mr. Vern Jefferson, Chairman, Sac & Fox Tribe of the Mississippi in Iowa
Mr. Johnathon Buffalo, THPO, Sac & Fox Tribe of the Mississippi in Iowa
Ms. Sunshine Thomas-Bear, THPO, Winnebago Tribe of Nebraska
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DEPARTMENT OF THE ARMY
OFFICE OF THE DEPUTY CHIEF OF STAFF, G-9
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

February 26, 2025

SUBJECT: Additional Coordination regarding Cultural Resources 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

Chairman Vern Jefferson
Sac & Fox Tribe of the Mississippi in Iowa
349 Meskwaki Rd.
Tama, IA 52339

Dear Chairman Jefferson:

The U.S. Army (Army) is initiating additional coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject environmental impact statement (EIS). The Army will prepare the EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) or other appropriate recipient and (2) the potential effects of the LRA's or other recipient's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 EIS evaluated the closure, and the Depot was officially closed in 2000. Also in 2000, the *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* (2000 SVADA PA) (Enclosure 2, Programmatic Agreement) was executed in support of the 1997 EIS to ensure adequate consideration of the effect of the closure and disposal on historic properties.

The Army originally initiated consultation with your office for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in November 2023 for the EA. Following completion of the draft EA, the Department of the Army Headquarters determined an EIS was required. The Army sent your Tribe an early coordination letter for the EIS in August 2024. Based on responses received during the EA scoping process and early coordination for the EIS, the Army also expanded the area of potential effects (APE) to include cultural resources and historic properties outside the parcel that could be impacted by the LRA's proposed reuse alternative.

At this time, the Army is initiating additional coordination with you for the EIS to request any comments you might have in addition to those you provided in your previous correspondence. The project remains unchanged from the description presented for the 2023 and 2024 coordination. The remainder of this letter provides information on the project location, the proposed action, alternatives, and potential affected cultural resources.

The 132-acre parcel is undeveloped land in Carroll County, IL (Enclosure 3, Site Map). The parcel includes Commander's Pond (formerly known as Ordnance School Lake). The parcel is bordered on the east and south by the Apple River, a tributary of the Mississippi River; the Mississippi River on the southwest; Vincent Road and Rofsteck Road on the west; and Crim Road on the north. While these rivers and roads form the boundaries of the parcel, they are not part of it. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by the 132-acre parcel, also is not part of the parcel to be transferred.

Since 2000, through the BRAC process, former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980. The Army has transferred these parcels to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the LRA. The Army has already transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west-northwest.

The LRA's finalized 2023 reuse plan for LRA Parcel 20 and additional information regarding the disposal and reuse of the parcel is available at Base Realignment and Closure (BRAC) > Great Lakes and Ohio River Division > Programs. In its plan, the LRA presents a conceptual reuse alternative to be implemented in three phases for developing LRA Parcel 20, which focuses on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development under each phase. To facilitate implementation, the LRA would implement the phases sequentially.

Phase 1 could be implemented within a target 5-year completion window, while phases 2 and 3 could follow, with both having 5-year-plus completion windows. The LRA's proposed reuse includes activities outside the boundary of LRA Parcel 20 in the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island. All of the LRA's reuse phases would require dredging.

In addition to the LRA's proposed reuse alternative, the EIS also will evaluate a recreation-only reuse alternative and a recreation and solar reuse alternative, which involve only the elements described in the LRA's 2023 reuse plan.

If any sites are determined to be eligible for listing in the National Register of Historic Places (NRHP) through additional archaeological testing within LRA Parcel 20, cultural resources encumbrances in the form of preservation covenant will apply in perpetuity, as appropriate, based on the 2000 SVADA PA and in consultation with the Illinois State Historic Preservation Office (SHPO) under Section 106 of the NHPA. See the preservation covenant in Enclosure 4.

The 2000 SVADA PA is still in effect. A complete Phase I archaeological survey of LRA Parcel 20 was conducted by Brockington Associates (Brockington) in 2020. LRA Parcel 20 has no known buildings, structures, or traditional cultural properties currently listed in the NRHP. Two archaeological sites within LRA Parcel 20 (sites 11-CA-1 and 11-CA-142) are identified as potentially eligible for listing in the NRHP, and a third site (Site 11-CA-194) is not eligible (Enclosure 5, Archaeological Sites Map; Enclosure 6, Summary of Archaeological Sites Table). Brockington provided the survey report to the Illinois SHPO on November 4, 2020. The SHPO responded in a letter dated December 24, 2020, that the project as proposed would have no adverse effect on the two potentially eligible sites and that Site 11-CA-194 is not eligible for listing in the NRHP, but that any plan modifications must include SHPO notification (Enclosure 7, SHPO letter dated December 24, 2020). Brockington finalized the *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois* in January 2021. In the finalized report, Brockington stated the portions of sites 11-CA-1 and 11-CA-142 located within LRA Parcel 20 were not NRHP-eligible, and, therefore, the disposal of the parcel would result in no adverse effects on any cultural resources. The authors noted that a complete eligibility statement for each site could not be made, however, because the Brockington survey remained within the bounds of LRA Parcel 20 and did not survey the portions of each site located outside the parcel.

In response to the LRA's 2023 reuse plan for LRA Parcel 20 and subsequent scoping comments on the upcoming EIS, the Army has included four additional potentially eligible archaeological sites (11-CA-44, 11-CA-143, 11-CA-147, and 11-CA-148) and one unassessed archaeological site (11-CA-60) outside LRA Parcel 20 as cultural resources that could be indirectly impacted by the Army's disposal of LRA Parcel 20 (Enclosure 5; Enclosure 6). While there are other cultural resources present within the APE for the proposed project, these resources were not included in the report because the Illinois SHPO determined the resources to be ineligible for the NRHP. The Army will include Site 11-CA-60 in the EIS, despite the Illinois SHPO having not assessed its eligibility, out of extreme caution relating to the potential effects of the proposed reuse alternatives to cultural resources. In addition, Site 11-CA-44, a Late Woodland mound and town site, is protected under the Illinois Human Remains Protection Act (Chapter 20 Illinois Compiled Statutes 3440). Sites 11-CA-44 and 11-CA-60 also are both located on land owned by USFWS that USACE has declared is Environmentally Sensitive due to the presence of archaeological resources.

If you have input regarding resources of concern to your Tribe or any questions concerning this BRAC action, contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter. The Draft EIS will be available for public review and comment at Base Realignment and Closure (BRAC) > Great Lakes and Ohio River Division > Programs following its publication later this year.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2025.02.26 13:14:02 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

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

Mr. Johnathon Buffalo, THPO
Sac & Fox Tribe of the Mississippi in Iowa
349 Meskwaki Rd.
Tama, IA 52339

Dear Mr. Buffalo:

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BRAC Program Manager
HQDA/ODCS G-9

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

Ms. Sunshine Thomas-Bear, THPO
Winnebago Tribe of Nebraska
920 N. Mission Dr.
Winnebago, NE 68071

Dear Ms. Thomas-Bear:

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Mr. David Grignon, THPO, Menominee Indian Tribe of Wisconsin
Ms. Gena Kakkak, Chairwoman, Menominee Indian Tribe of Wisconsin
Mr. Logan York, THPO, Miami Tribe of Oklahoma
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Dr. Andrea Hunter, Director and THPO, Historic Preservation Office, The Osage Nation
Mr. Geoffrey Standing Bear, Principal Chief, The Osage Nation
Ms. Tiauna Carnes, Chairperson, Sac & Fox Nation of Missouri in Kansas and Nebraska
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Mr. Randle Carter, Principal Chief, Sac & Fox Nation, Oklahoma
Mr. Vern Jefferson, Chairman, Sac & Fox Tribe of the Mississippi in Iowa
Mr. Johnathon Buffalo, THPO, Sac & Fox Tribe of the Mississippi in Iowa
Ms. Victoria Kitcheyan, Chairwoman, Winnebago Tribe of Nebraska

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

February 26, 2025

SUBJECT: Additional Coordination regarding Cultural Resources 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

Chairwoman Victoria Kitcheyan
Winnebago Tribe of Nebraska
920 N. Mission Dr.
Winnebago, NE 68071

Dear Chairwoman Kitcheyan:

The U.S. Army (Army) is initiating additional coordination with your office under Section 106 of the National Historic Preservation Act (NHPA) for the subject environmental impact statement (EIS). The Army will prepare the EIS in accordance with the National Environmental Policy Act of 1969 (Title 42 of the *United States Code* §§ 4321–4370f) and its implementing regulations issued by the Council on Environmental Quality (Title 40 of the *Code of Federal Regulations* [CFR] parts 1500–1508) and the Army (32 CFR Part 651, *Environmental Analysis of Army Actions*). The Army will prepare the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA) in Illinois and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) or other appropriate recipient and (2) the potential effects of the LRA's or other recipient's secondary indirect action of reuse of the parcel.

SVADA is in northwestern Illinois along the Mississippi River in Carroll and Jo Daviess counties, about 9 miles north of the city of Savanna, IL (Enclosure 1, Location Map). The 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 EIS evaluated the closure, and the Depot was officially closed in 2000. Also in 2000, the *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* (2000 SVADA PA) (Enclosure 2, Programmatic Agreement) was executed in support of the 1997 EIS to ensure adequate consideration of the effect of the closure and disposal on historic properties.

The Army originally initiated consultation with your office for this project as an environmental assessment (EA) in early 2020. The project was put on hold, however, while the LRA developed its reuse plan for the 132-acre parcel. After receiving the LRA reuse plan, the Army reinitiated consultation with you in November 2023 for the EA. Following completion of the draft EA, the Department of the Army Headquarters determined an EIS was required. The Army sent your Tribe an early coordination letter for the EIS in August 2024. Based on responses received during the EA scoping process and early coordination for the EIS, the Army also expanded the area of potential effects (APE) to include cultural resources and historic properties outside the parcel that could be impacted by the LRA's proposed reuse alternative.

At this time, the Army is initiating additional coordination with you for the EIS to request any comments you might have in addition to those you provided in your previous correspondence. The project remains unchanged from the description presented for the 2023 and 2024 coordination. The remainder of this letter provides information on the project location, the proposed action, alternatives, and potential affected cultural resources.

The 132-acre parcel is undeveloped land in Carroll County, IL (Enclosure 3, Site Map). The parcel includes Commander's Pond (formerly known as Ordnance School Lake). The parcel is bordered on the east and south by the Apple River, a tributary of the Mississippi River; the Mississippi River on the southwest; Vincent Road and Rofsteck Road on the west; and Crim Road on the north. While these rivers and roads form the boundaries of the parcel, they are not part of it. An active Burlington Northern Santa Fe Railway right-of-way bisects the parcel from northwest to southeast but is not part of the parcel to be transferred. A sewage treatment plant owned by the Army, which is surrounded by the 132-acre parcel, also is not part of the parcel to be transferred.

Since 2000, through the BRAC process, former SVADA property parcels have been certified as clean from environmental contaminants in accordance with the Comprehensive Environmental Response, Compensation, and Liability Act of 1980. The Army has transferred these parcels to federal, state, or local agencies. Ultimately, the Army will transfer the majority of SVADA land to the U.S. Fish and Wildlife Service (USFWS) and the remainder to the U.S. Army Corps of Engineers (USACE), the Illinois Department of Natural Resources, and the LRA. The Army has already transferred other SVADA surplus land to the LRA for redevelopment as the Savanna Industrial Park (SIP). The SIP is adjacent to the 132-acre parcel to the west-northwest.

The LRA's finalized 2023 reuse plan for LRA Parcel 20 and additional information regarding the disposal and reuse of the parcel is available at Base Realignment and Closure (BRAC) > Great Lakes and Ohio River Division > Programs. In its plan, the LRA presents a conceptual reuse alternative to be implemented in three phases for developing LRA Parcel 20, which focuses on creating an inland commodities shipping facility that includes commercial and industrial, recreational, and potentially solar development under each phase. To facilitate implementation, the LRA would implement the phases sequentially.

Phase 1 could be implemented within a target 5-year completion window, while phases 2 and 3 could follow, with both having 5-year-plus completion windows. The LRA's proposed reuse includes activities outside the boundary of LRA Parcel 20 in the Apple River, Brickhouse Slough, and Mississippi River and along Apple Island. All of the LRA's reuse phases would require dredging.

In addition to the LRA's proposed reuse alternative, the EIS also will evaluate a recreation-only reuse alternative and a recreation and solar reuse alternative, which involve only the elements described in the LRA's 2023 reuse plan.

If any sites are determined to be eligible for listing in the National Register of Historic Places (NRHP) through additional archaeological testing within LRA Parcel 20, cultural resources encumbrances in the form of preservation covenant will apply in perpetuity, as appropriate, based on the 2000 SVADA PA and in consultation with the Illinois State Historic Preservation Office (SHPO) under Section 106 of the NHPA. See the preservation covenant in Enclosure 4.

The 2000 SVADA PA is still in effect. A complete Phase I archaeological survey of LRA Parcel 20 was conducted by Brockington Associates (Brockington) in 2020. LRA Parcel 20 has no known buildings, structures, or traditional cultural properties currently listed in the NRHP. Two archaeological sites within LRA Parcel 20 (sites 11-CA-1 and 11-CA-142) are identified as potentially eligible for listing in the NRHP, and a third site (Site 11-CA-194) is not eligible (Enclosure 5, Archaeological Sites Map; Enclosure 6, Summary of Archaeological Sites Table). Brockington provided the survey report to the Illinois SHPO on November 4, 2020. The SHPO responded in a letter dated December 24, 2020, that the project as proposed would have no adverse effect on the two potentially eligible sites and that Site 11-CA-194 is not eligible for listing in the NRHP, but that any plan modifications must include SHPO notification (Enclosure 7, SHPO letter dated December 24, 2020). Brockington finalized the *Phase I Archaeological Resources Survey of LRA Parcel 20 on the Savanna Army Depot, Carroll County, Illinois* in January 2021. In the finalized report, Brockington stated the portions of sites 11-CA-1 and 11-CA-142 located within LRA Parcel 20 were not NRHP-eligible, and, therefore, the disposal of the parcel would result in no adverse effects on any cultural resources. The authors noted that a complete eligibility statement for each site could not be made, however, because the Brockington survey remained within the bounds of LRA Parcel 20 and did not survey the portions of each site located outside the parcel.

In response to the LRA's 2023 reuse plan for LRA Parcel 20 and subsequent scoping comments on the upcoming EIS, the Army has included four additional potentially eligible archaeological sites (11-CA-44, 11-CA-143, 11-CA-147, and 11-CA-148) and one unassessed archaeological site (11-CA-60) outside LRA Parcel 20 as cultural resources that could be indirectly impacted by the Army's disposal of LRA Parcel 20 (Enclosure 5; Enclosure 6). While there are other cultural resources present within the APE for the proposed project, these resources were not included in the report because the Illinois SHPO determined the resources to be ineligible for the NRHP. The Army will include Site 11-CA-60 in the EIS, despite the Illinois SHPO having not assessed its eligibility, out of extreme caution relating to the potential effects of the proposed reuse alternatives to cultural resources. In addition, Site 11-CA-44, a Late Woodland mound and town site, is protected under the Illinois Human Remains Protection Act (Chapter 20 Illinois Compiled Statutes 3440). Sites 11-CA-44 and 11-CA-60 also are both located on land owned by USFWS that USACE has declared is Environmentally Sensitive due to the presence of archaeological resources.

If you have input regarding resources of concern to your Tribe or any questions concerning this BRAC action, contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter. The Draft EIS will be available for public review and comment at Base Realignment and Closure (BRAC) > Great Lakes and Ohio River Division > Programs following its publication later this year.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2025.02.26 13:14:02 -05'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Joe Hand, USACE, Mobile District, Contracting Officer Representative
Mr. William (Todd) Knuth, SVADA, Base Environmental Coordinator
Mr. Kent Collier, NAGPRA, Kickapoo Tribe of Oklahoma
Ms. Susan Tiger, NAGPRA Representative, Kickapoo Tribe of Oklahoma
Mr. Darwin Kaskaske, Chairman, Kickapoo Tribe of Oklahoma
Mr. Jon Greendeer, President, Ho-Chunk Nation of Wisconsin
Mr. William Quackenbush, Tribal Historic Preservation Officer (THPO), Ho-Chunk Nation of Wisconsin
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Mr. Vern Jefferson, Chairman, Sac & Fox Tribe of the Mississippi in Iowa
Mr. Johnathon Buffalo, THPO, Sac & Fox Tribe of the Mississippi in Iowa
Ms. Sunshine Thomas-Bear, THPO, Winnebago Tribe of Nebraska

Appendix G5. July 2025 Coordination and Consultation

Enclosures are provided only for the first letter.

Responses received follow the letter sent.

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

July 22, 2025

SUBJECT: Update to the LRA Reuse Alternative for the 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

Mr. Kraig McPeek, Field Office Supervisor
USFWS, Illinois-Iowa Ecological Services Field Office
1511 47th Ave.
Moline, IL 61265

Dear Mr. McPeek:

The U.S. Army (Army) is updating you on a change to a reuse alternative that will be evaluated in the subject Environmental Impact Statement (EIS). The Army is preparing the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois (Enclosure 1, Location Map), and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) and (2) the LRA's secondary indirect action of reuse of the parcel.

As a reminder about the subject EIS, the 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 EIS evaluated the closure, and the Depot was closed in 2000. Since 2000, through the BRAC process, as former SVADA property parcels have been certified as clean, the Army has transferred them to federal, state, or local agencies. In 2016, the U.S. Fish and Wildlife Service withdrew interest in the 132-acre parcel of land (formerly known as Parcel FWS 5) at the southeastern end of SVADA. The Army officially identified the parcel as surplus in January 2018. The Army's proposed action is disposal of the parcel, which has been redesignated LRA Parcel 20, and transferring the property to the LRA.

The LRA's 2023 reuse plan for the parcel is available at doc-parcel-20-final-reuse-plan-1689879402.pdf. The LRA's proposed reuse is to create an inland port on LRA Parcel 20, to be implemented in three phases. The plan also includes activities outside the boundary of LRA Parcel 20 in the Apple River, in Brickhouse Slough of the Mississippi River, and along Apple River Island. The first phase of the LRA's reuse plan requires dredging. The LRA has updated the first phase to include additional dredging not reflected in the 2023 reuse plan.

The LRA originally planned to dredge south from Commander's Pond in Brickhouse Slough, between the mainland and Apple River Island, to connect Brickhouse Slough with the Upper Mississippi River navigation channel (Enclosure 2, LRA Reuse Alternative Phase 1, Short Reach). In addition to the Short Reach, the LRA update includes dredging north from Commander's Pond in Brickhouse Slough, between the mainland and Apple River Island, to connect Brickhouse Slough with the Upper Mississippi River navigation channel and includes a turning basin (Enclosure 3, LRA Reuse Alternative Phase 1, Short and Long Reaches).

Other than the addition of the Long Reach dredging, phases 1, 2, and 3 remain the same.

If you have input regarding resources of concern to your agency or any questions concerning this BRAC action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2025.07.17 11:04:15 -04'00'

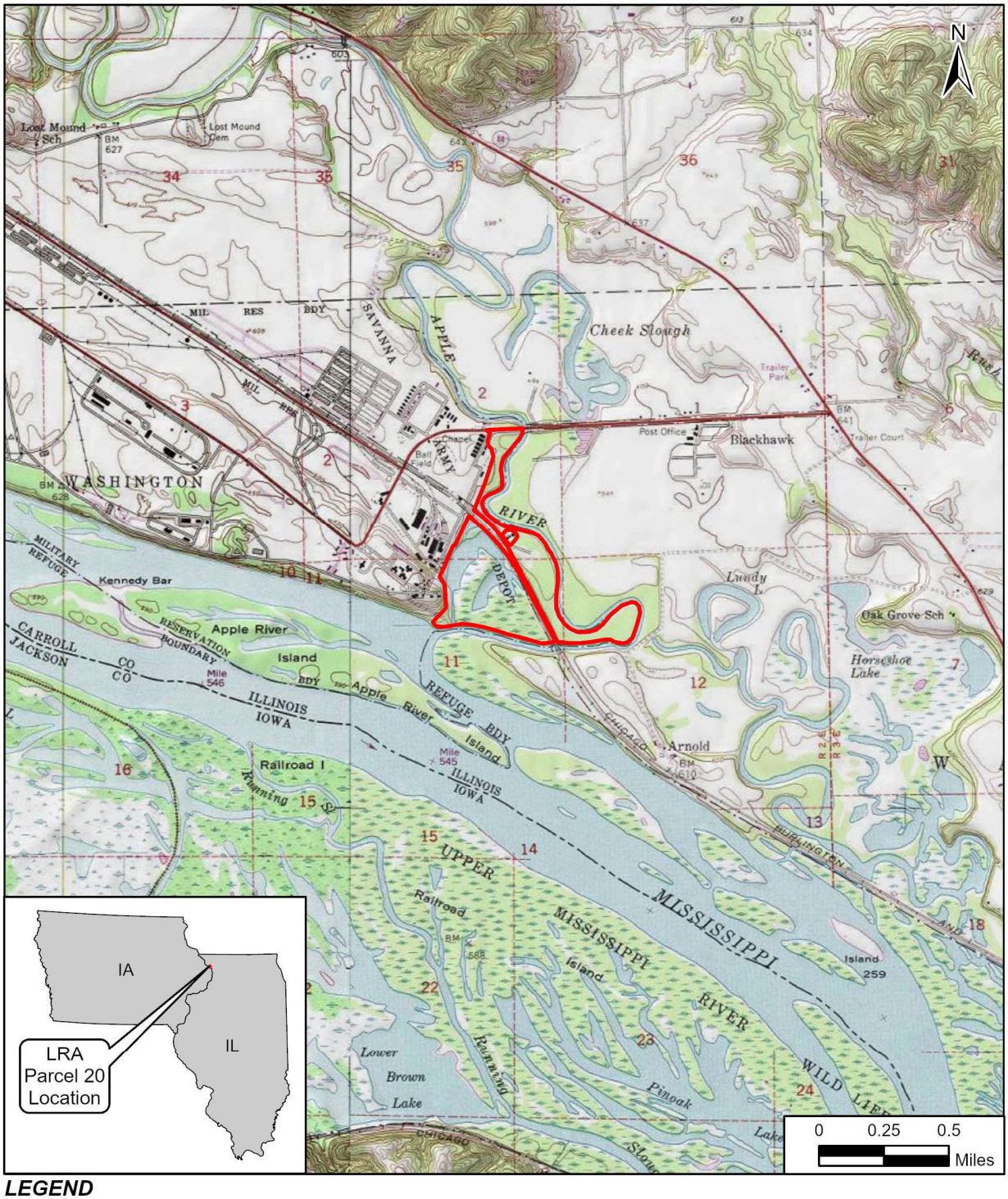
Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Travis Black, Director, Inland Waterways Gateway (St. Louis), U.S. Department of Transportation, Maritime Administration
Mr. Ed Britton, District Manager, U.S. Fish and Wildlife Service (USFWS), Upper Mississippi River National Wildlife and Fish Refuge, Savanna District Office
Mr. Johnathon Buffalo, Tribal Historic Preservation Officer (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, Native American Graves Protection and Repatriation Act (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 Environmental Protection Agency
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Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity
Ms. Kathy Kowal, Lead NEPA Reviewer, USEPA Region 5
Mr. Christopher Koeppel, Assistant Director, Office of Federal Agency Programs, Federal Property Management Section, Advisory Council on Historic Preservation
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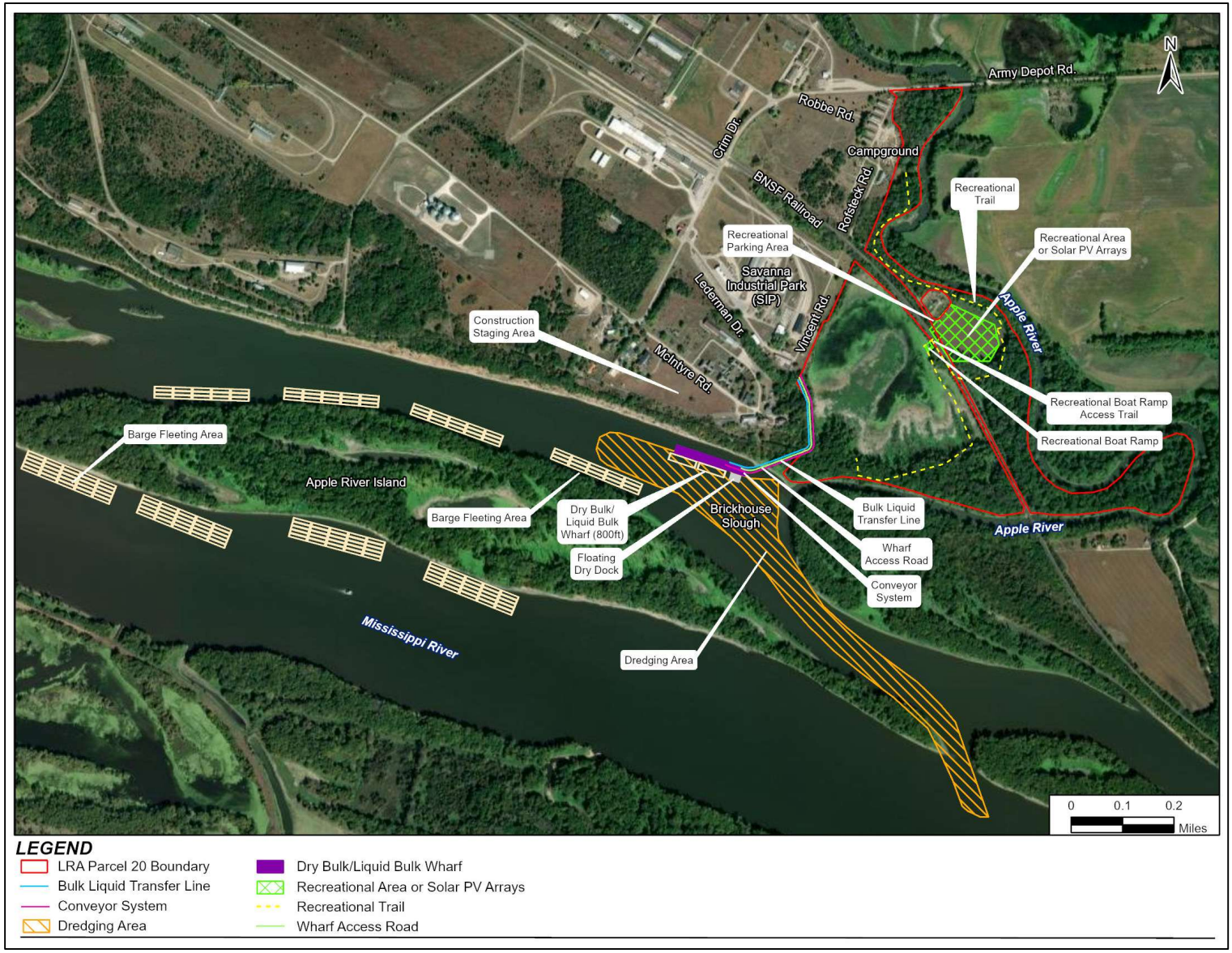
Enclosure 1: Location Map



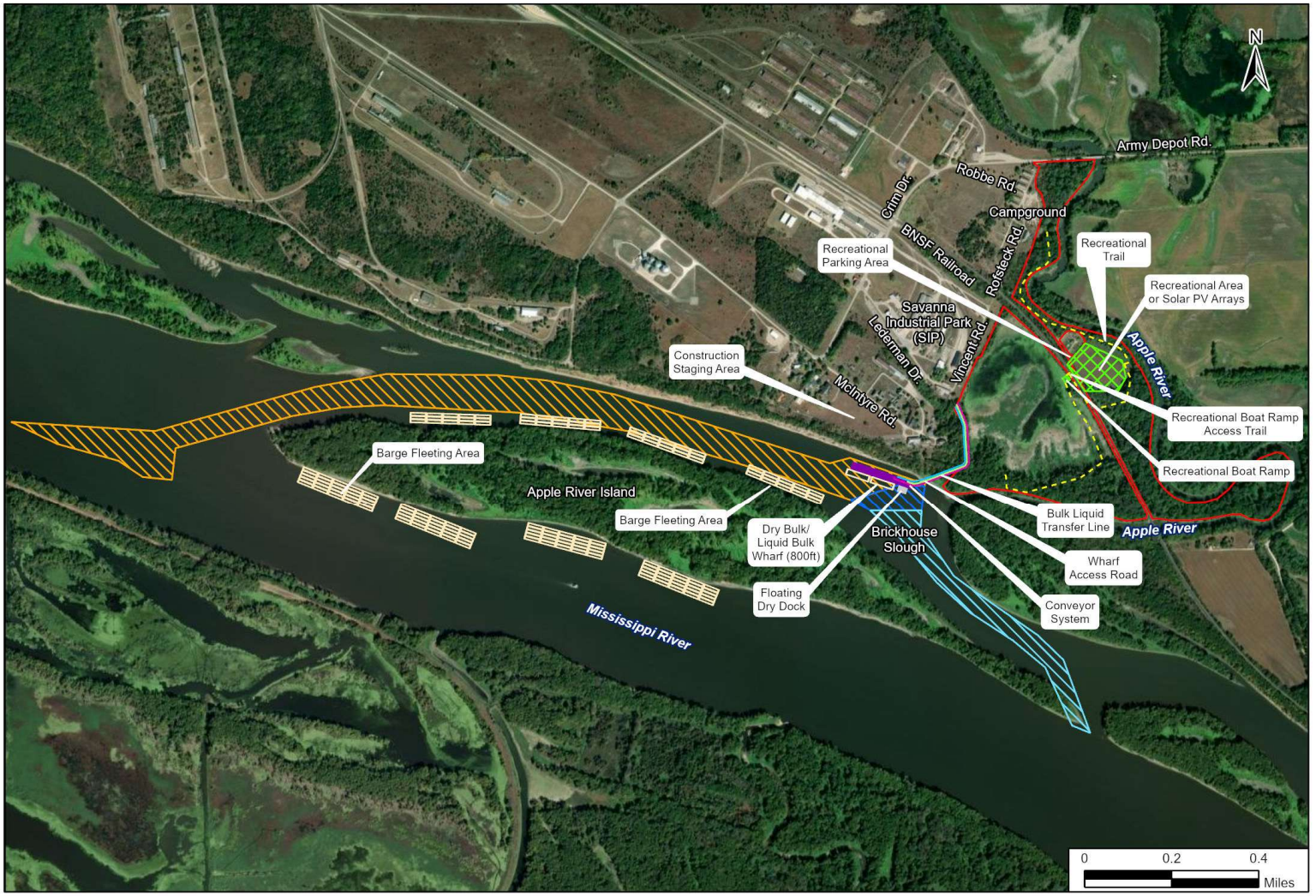
LEGEND

LRA Parcel 20 Boundary

Enclosure 2: LRA Reuse Alternative Phase 1, Short Reach



Enclosure 3: LRA Reuse Alternative Phase 1, Short and Long Reaches



LEGEND

- LRA Parcel 20 Boundary
- Bulk Liquid Transfer Line
- Conveyor System

Dredging Area

- Long Reach Dredging Area
- Overlap Dredging Area
- Short Reach Dredging Area

- Dry Bulk/Liquid Bulk Wharf
- Recreational Area or Solar PV Arrays
- Recreational Trail
- Wharf Access Road

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

July 22, 2025

SUBJECT: Update to the LRA Reuse Alternative for the 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

Mr. Ed Britton, District Manager
USFWS, Upper Mississippi River National Wildlife and Fish Refuge, Savanna District Office
7071 Riverview Rd.
Thomson, IL 61285

Dear Mr. Britton:

The U.S. Army (Army) is updating you on a change to a reuse alternative that will be evaluated in the subject Environmental Impact Statement (EIS). The Army is preparing the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois (Enclosure 1, Location Map), and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) and (2) the LRA's secondary indirect action of reuse of the parcel.

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Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2025.07.17 11:04:15 -04'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Travis Black, Director, Inland Waterways Gateway (St. Louis), U.S. Department of Transportation, Maritime Administration
Mr. Johnathon Buffalo, Tribal Historic Preservation Officer (THPO), Sac & Fox Tribe of the Mississippi in Iowa
Ms. Tiauna Carnes, Chairperson, Sac & Fox Nation of Missouri in Kansas and Nebraska
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Mr. Kent Collier, Native American Graves Protection and Repatriation Act (NAGPRA), Kickapoo Tribe of Oklahoma
Ms. Jodi Creswell, Chief, Environmental Planning Branch, USACE, Rock Island District

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Mr. David Grignon, THPO, Menominee Indian Tribe of Wisconsin
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Ms. Krystle McClain, NEPA Program Supervisor, USEPA Region 5
Mr. Kraig McPeek, 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
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Ms. Carol (CJ) Wallace, Cultural Resources Coordinator, Illinois DNR
Ms. Melissa Wiatrolik, THPO, Little Traverse Bay Bands of Odawa Indians
Mr. Logan York, HPO, Miami Tribe of Oklahoma

United States Department of the Interior

FISH AND WILDLIFE SERVICE

Upper Mississippi River National Wildlife and Fish Refuge
7071 Riverview Road
Thomson, Illinois 61285
July 29, 2025

Todd Knuth, Base Environmental Coordinator
Savanna Army Depot Activity
18935 B Street
Savanna, Illinois 61074

Subject: U.S. Fish and Wildlife Service comments on the proposed change to the reuse alternative for the Environmental Impact Statement for Parcel 20

Dear Mr. Knuth:

Thank you for the opportunity for U.S. Fish and Wildlife Service' Upper Mississippi River National Wildlife and Fish Refuge (Refuge) to provide additional comments on Army's 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 Army's Environmental Assessment and Supplemental Environmental Impact Statement for this project. All concerns identified 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. Documentation will need to be submitted to address 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.

Here are additional comments regarding the proposed change for barge access to enter the north end (instead of the south end) of Brickhouse Slough.
1) There is a closing dam within Brickhouse Slough that will need to be removed to allow dredging. The Corps of Engineers Rock Island District should be consulted to identify how this may impact water flows in the main channel of the river.
2) There are wing dams extending out from the island shoreline located north of the newly proposed access route that may need to be removed. The Corps of Engineers Rock Island District should be consulted to identify how this may impact water flows in the main channel of the river.
3) Dredging out to the main river channel may cause water flows to be diverted into Brickhouse Slough due to the increased bottom depth leading into the slough. The Corps of Engineers Rock Island District should be consulted to identify how this may impact water flows in the main channel of the river.
4) The additional proposed dredging may impact federally endangered species such as the Higgins' eye pearly mussel that has been found within Brickhouse Slough. There will need to be a plan to protect threatened/endangered species throughout the new proposed project area.

5) The amount of dredging (cubic yards) needed for the proposed north access route needs to be identified to include initial dredging and anticipated annual maintenance dredging.

The updated map that was provided does not show the structural features previously identified within Parcel 20 by the LRA's proposed reuse to create an inland port within the parcel (Preferred Alternative – Commander's Pond Full). These structures included travel lift piers, a repair fleeting area, two lift-on/lift-off wharfs, and access dredging into Parcel 20. Have these features been deleted from LRA's Preferred Alternative? If the answer is yes, then the LRA's proposed use of Parcel 20 no longer includes any structural components related to an inland port since all proposed structures are to be located outside of the parcel.

Thank you for the opportunity to comment on Army's 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

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

July 22, 2025

SUBJECT: Update to the LRA Reuse Alternative for the 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

Ms. Jodi Creswell, Chief, Environmental Planning Branch
USACE, Rock Island District
1500 Rock Island Avenue
Rock Island, IL 61201

Dear Ms. Creswell:

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Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Travis Black, Director, Inland Waterways Gateway (St. Louis), U.S. Department of Transportation, Maritime Administration
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DEPARTMENT OF THE ARMY
OFFICE OF THE DEPUTY CHIEF OF STAFF, G-9
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

July 22, 2025

SUBJECT: Update to the LRA Reuse Alternative for the 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

Ms. Krystle McClain, NEPA Program Supervisor
US EPA Region 5
77 W. Jackson Blvd.
Chicago, IL 60604

Dear Ms. McClain:

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

Dear Ms. Goers:

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Ms. Kathy Kowal, Lead NEPA Reviewer
US EPA Region 5
77 W. Jackson Blvd.
Chicago, IL 60604

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US DOT Maritime Administration (MARAD)
1222 Spruce St., Suite 2.202F
St. Louis, MO 63103

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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 Wiatrolik, THPO, Little Traverse Bay Bands of Odawa Indians
Mr. Logan York, HPO, Miami Tribe of Oklahoma

From: Black, Travis (MARAD) <Travis.Black@dot.gov>
Sent: Tuesday, July 22, 2025 9:33 AM
To: Previto, Amanda
Cc: william.t.knuth.civ@army.mil; Lineer, Thomas A CIV USARMY HQDA DCS G-9 (USA); joseph.h.hand@usace.army.mil; casey.k.potts@usace.army.mil; Hayes, Beverly; Cannella, Michelle
Subject: RE: Updated Coordination for BRAC of LRA Parcel 20 at SVADA, IL

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

Thank you, Amanda,

We have no issues or concerns about the proposed actions contained in the July 17 BRAC action memo.

I received the letter at my 1222 Spruce St., Suite 2.202F, St. Louis Missouri 63103 also, please use that address exclusively, I am no longer in the DC office.

Thanks & Regards,

Travis

Travis Black, IMPE
Director, Great Lakes and Western Rivers Gateway
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: Previto, Amanda <AMANDA.PREVITO@tetratech.com>
Sent: Monday, July 21, 2025 8:56 AM
To: Black, Travis (MARAD) <Travis.Black@dot.gov>
Cc: william.t.knuth.civ@army.mil; Lineer, Thomas A CIV USARMY HQDA DCS G-9 (USA) <thomas.a.lineer.civ@army.mil>; joseph.h.hand@usace.army.mil; casey.k.potts@usace.army.mil; Hayes, Beverly <Beverly.Hayes@tetratech.com>; Cannella, Michelle <Michelle.Cannella@tetratech.com>
Subject: Updated Coordination for BRAC of LRA Parcel 20 at SVADA, IL

You don't often get email from amanda.previto@tetratech.com. Learn why this is important

CAUTION: This email originated from outside of the Department of Transportation (DOT). Do not click on links or open attachments unless you recognize the sender and know the content is safe.

Good morning:

On behalf of the U.S. Army, attached please find a coordination letter regarding an update to 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), Carroll and Jo Daviess counties, Illinois. Per the attached letter, if you have input regarding resources of concern to your agency or questions about the BRAC action, 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,

Amanda Previto

Amanda Previto | Project Admin Professional III
Direct: **251.288.6091** | Cell: **251.599.7021**
Amanda.Previto@tetratech.com

Tetra Tech | *Leading with Science®*
107 Saint Francis Street, Suite 2370, Mobile, AL 36602
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DEPARTMENT OF THE ARMY
OFFICE OF THE DEPUTY CHIEF OF STAFF, G-9
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

July 22, 2025

SUBJECT: Update to the LRA Reuse Alternative for the 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

Mr. Travis Black, Director, Inland Waterways Gateway (St. Louis)
US DOT Maritime Administration (MARAD)
1200 New Jersey Ave. SE
Washington, DC 20590

Dear Mr. Black:

The U.S. Army (Army) is updating you on a change to a reuse alternative that will be evaluated in the subject Environmental Impact Statement (EIS). The Army is preparing the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois (Enclosure 1, Location Map), and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) and (2) the LRA's secondary indirect action of reuse of the parcel.

As a reminder about the subject EIS, the 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 EIS evaluated the closure, and the Depot was closed in 2000. Since 2000, through the BRAC process, as former SVADA property parcels have been certified as clean, the Army has transferred them to federal, state, or local agencies. In 2016, the U.S. Fish and Wildlife Service withdrew interest in the 132-acre parcel of land (formerly known as Parcel FWS 5) at the southeastern end of SVADA. The Army officially identified the parcel as surplus in January 2018. The Army's proposed action is disposal of the parcel, which has been redesignated LRA Parcel 20, and transferring the property to the LRA.

The LRA's 2023 reuse plan for the parcel is available at doc-parcel-20-final-reuse-plan-1689879402.pdf. The LRA's proposed reuse is to create an inland port on LRA Parcel 20, to be implemented in three phases. The plan also includes activities outside the boundary of LRA Parcel 20 in the Apple River, in Brickhouse Slough of the Mississippi River, and along Apple River Island. The first phase of the LRA's reuse plan requires dredging. The LRA has updated the first phase to include additional dredging not reflected in the 2023 reuse plan.

The LRA originally planned to dredge south from Commander's Pond in Brickhouse Slough, between the mainland and Apple River Island, to connect Brickhouse Slough with the Upper Mississippi River navigation channel (Enclosure 2, LRA Reuse Alternative Phase 1, Short Reach). In addition to the Short Reach, the LRA update includes dredging north from Commander's Pond in Brickhouse Slough, between the mainland and Apple River Island, to connect Brickhouse Slough with the Upper Mississippi River navigation channel and includes a turning basin (Enclosure 3, LRA Reuse Alternative Phase 1, Short and Long Reaches).

Other than the addition of the Long Reach dredging, phases 1, 2, and 3 remain the same.

If you have input regarding resources of concern to your agency or any questions concerning this BRAC action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2025.07.17 11:04:15 -04'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Ed Britton, District Manager, U.S. Fish and Wildlife Service (USFWS), Upper Mississippi River National Wildlife and Fish Refuge, Savanna District Office
Mr. Johnathon Buffalo, Tribal Historic Preservation Officer (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, Native American Graves Protection and Repatriation Act (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 Environmental Protection Agency
Ms. Regina Gasco-Bentley, Chairperson, Little Traverse Bay Bands of Odawa Indians
Ms. Nicole Goers, Remedial Project Manager, U.S. Environmental Protection Agency (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. Joe Hand, Contracting Officer Representative, U.S. Army Corps of Engineers (USACE), Mobile District
Mr. Bradley Hayes, Manager, Impact Assessment Section, Illinois Department of Natural Resources (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. Victoria Kitcheyan, Chairwoman, Winnebago Tribe of Nebraska
Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity
Ms. Kathy Kowal, Lead NEPA Reviewer, USEPA Region 5
Mr. Christopher Koeppel, Assistant Director, Office of Federal Agency Programs, Federal Property Management Section, Advisory Council on Historic Preservation
Mr. Zachary Krug, Illinois State Hazard Mitigation Officer
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 McPeek, Field Office Supervisor, USFWS, Illinois-Iowa Ecological Services Field Office
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Mr. Logan York, HPO, Miami Tribe of Oklahoma

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

July 22, 2025

SUBJECT: Update to the LRA Reuse Alternative for the 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

REFERENCE: ACHP Project #020363

Mr. Christopher Koeppel, Assistant Director, Office of Federal Agency Programs
Advisory Council on Historic Preservation
401 F Street NW, Suite 308
Washington, D.C. 20001

Dear Mr. Koeppel:

The U.S. Army (Army) is updating you on a change to a reuse alternative that will be evaluated in the subject Environmental Impact Statement (EIS). The Army is preparing the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois (Enclosure 1, Location Map), and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) and (2) the LRA's secondary indirect action of reuse of the parcel.

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Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2025.07.17 11:04:15 -04'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Travis Black, Director, Inland Waterways Gateway (St. Louis), U.S. Department of Transportation, Maritime Administration
Mr. Ed Britton, District Manager, U.S. Fish and Wildlife Service (USFWS), Upper Mississippi River National Wildlife and Fish Refuge, Savanna District Office
Mr. Johnathon Buffalo, Tribal Historic Preservation Officer (THPO), Sac & Fox Tribe of the Mississippi in Iowa
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600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

July 22, 2025

SUBJECT: Update to the LRA Reuse Alternative for the 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

REFERENCE: 0158100002-Carroll County, SVADA, Superfund/Technical Reports

Ms. Charlene Falco, Project Manager, Federal Site Remediation Section, Bureau of Land
Illinois EPA, Headquarters
1021 North Grand Avenue East
Springfield, IL 62794

Dear Ms. Falco:

The U.S. Army (Army) is updating you on a change to a reuse alternative that will be evaluated in the subject Environmental Impact Statement (EIS). The Army is preparing the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois (Enclosure 1, Location Map), and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) and (2) the LRA's secondary indirect action of reuse of the parcel.

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Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2025.07.17 11:04:15 -04'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
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Mr. William (Todd) Knuth, Base Environmental Coordinator, Savanna Army Depot Activity
Ms. Kathy Kowal, Lead NEPA Reviewer, USEPA Region 5
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Ms. Carol (CJ) Wallace, Cultural Resources Coordinator, Illinois DNR
Ms. Melissa Wiatrolik, THPO, Little Traverse Bay Bands of Odawa Indians
Mr. Logan York, HPO, Miami Tribe of Oklahoma

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY
2520 WEST ILES AVENUE, P.O. BOX 19276, SPRINGFIELD, ILLINOIS 62794-9276 · (217) 782-3397
JB PRITZKER, GOVERNOR **JAMES JENNINGS**, ACTING DIRECTOR

August 6, 2025

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 July 17, 2025 letter regarding the *Update to the LRA Reuse Alternative for the Environmental Impact Statement for the Implementation of Base Realignment and Closure 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…action" regarding an update of the Environmental Impact Statement (EIS) for Parcel 20. The update involves sediment dredging from an additional area ("long reach") from Brickhouse Slough to the north "between the mainland and Apple River Island, to connect Brickhouse Slough with the Upper Mississippi River navigation channel and includes a turning basin."

Illinois EPA notes that no estimate of dredging depth or volume is included in the update. Without such estimates, the environmental impact may not be fully evaluated in the EIS. Other than this, Illinois EPA provides no additional comments at this time, beyond that provided in its February 1, 2024 correspondence. Illinois EPA reserves the right to provide additional comments based on any questions or issues that arise through meetings, reports, or otherwise and/or until a dredged material management plan is submitted.

Illinois EPA's comments do not provide a comprehensive regulatory and permitting review for the Local Reuse Authority's (LRA) alternatives or for the update to the reuse plans in the EIS. 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.

Thank you for the opportunity to provide input regarding the update of the EIS. 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

CAF:GSM:PTL:p:\\SDVA\Parcel 20\Review_EIS Update_08 06 2025.docx

cc: Nicole Goers, USEPA, Region 5
Beth Whetsell, Illinois Department of Natural Resources
Ed Britton, US Fish and Wildlife Service
Kirk Bargerhuff, US Army Corps of Engineers
Tom Lineer, BRAC Program Manager
Mara Roche, Jo Carroll Depot Local Redevelopment Authority

DEPARTMENT OF THE ARMY
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600 ARMY PENTAGON
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July 22, 2025

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REFERENCE: EcoCAT Review #2408046

Ms. Natalie Phelps Finnie, Director
Illinois DNR
1 Natural Resources Way
Springfield, IL 62702

Dear Ms. Phelps Finnie:

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Enclosures

cc:
Mr. Travis Black, Director, Inland Waterways Gateway (St. Louis), U.S. Department of Transportation, Maritime Administration
Mr. Ed Britton, District Manager, U.S. Fish and Wildlife Service (USFWS), Upper Mississippi River National Wildlife and Fish Refuge, Savanna District Office
Mr. Johnathon Buffalo, Tribal Historic Preservation Officer (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
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Ms. Regina Gasco-Bentley, Chairperson, Little Traverse Bay Bands of Odawa Indians
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DEPARTMENT OF THE ARMY
OFFICE OF THE DEPUTY CHIEF OF STAFF, G-9
600 ARMY PENTAGON
WASHINGTON, DC 20310-0600

July 22, 2025

SUBJECT: Update to the LRA Reuse Alternative for the 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

REFERENCE: EcoCAT Review #2408046

Mr. Bradley Hayes, Manager, Impact Assessment Section
Illinois DNR, EcoCAT, Div. of Real Estate Services & Consultation, Office of Realty & Capital Planning
1 Natural Resources Way
Springfield, IL 62702

Dear Mr. Hayes:

The U.S. Army (Army) is updating you on a change to a reuse alternative that will be evaluated in the subject Environmental Impact Statement (EIS). The Army is preparing the EIS to evaluate (1) the potential effects of the Army's primary direct action of disposing of a 132-acre parcel of the Savanna Army Depot Activity (SVADA), Illinois (Enclosure 1, Location Map), and transferring the parcel to the Jo-Carroll Depot Local Redevelopment Authority (LRA) and (2) the LRA's secondary indirect action of reuse of the parcel.

As a reminder about the subject EIS, the 1995 Base Realignment and Closure (BRAC) Commission recommended SVADA for closure. A 1997 EIS evaluated the closure, and the Depot was closed in 2000. Since 2000, through the BRAC process, as former SVADA property parcels have been certified as clean, the Army has transferred them to federal, state, or local agencies. In 2016, the U.S. Fish and Wildlife Service withdrew interest in the 132-acre parcel of land (formerly known as Parcel FWS 5) at the southeastern end of SVADA. The Army officially identified the parcel as surplus in January 2018. The Army's proposed action is disposal of the parcel, which has been redesignated LRA Parcel 20, and transferring the property to the LRA.

The LRA's 2023 reuse plan for the parcel is available at doc-parcel-20-final-reuse-plan-1689879402.pdf. The LRA's proposed reuse is to create an inland port on LRA Parcel 20, to be implemented in three phases. The plan also includes activities outside the boundary of LRA Parcel 20 in the Apple River, in Brickhouse Slough of the Mississippi River, and along Apple River Island. The first phase of the LRA's reuse

plan requires dredging. The LRA has updated the first phase to include additional dredging not reflected in the 2023 reuse plan.

The LRA originally planned to dredge south from Commander's Pond in Brickhouse Slough, between the mainland and Apple River Island, to connect Brickhouse Slough with the Upper Mississippi River navigation channel (Enclosure 2, LRA Reuse Alternative Phase 1, Short Reach). In addition to the Short Reach, the LRA update includes dredging north from Commander's Pond in Brickhouse Slough, between the mainland and Apple River Island, to connect Brickhouse Slough with the Upper Mississippi River navigation channel and includes a turning basin (Enclosure 3, LRA Reuse Alternative Phase 1, Short and Long Reaches).

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If you have input regarding resources of concern to your agency or any questions concerning this BRAC action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2025.07.17 11:04:15 -04'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

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Illinois Department of Natural Resources
JB Pritzker, Governor • Natalie Phelps Finnie, Director
One Natural Resources Way • Springfield, Illinois 62702-1271
www.dnr.illinois.gov

September 9, 2025

Amanda Previto
Project Admin Professional III
107 Saint Francis Street, Suite 2370
Mobile, AL 36602

RE: Updated Coordination for BRAC of LRA Parcel 20 at SVADA, IL
Consultation Program
EcoCAT Review #2408046
Carroll County

Dear Ms. Previto:

The Department has received the coordination letter regarding the update to 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 (CERCLA), and recognize for this proposed project, coordination with IL EPA and United States Environmental Protection Agency (US EPA) may be necessary and is separate from this review.

The proposed project, as described by the U.S. Fish and Wildlife Service (USFWS) was 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 LRA has updated the first phase to include additional dredging not reflected in the 2023 reuse plan. The LRA originally planned to dredge south from Commander's Pond in Brickhouse Slough, between the mainland and Apple River Island, to connect Brickhouse Slough with the Upper Mississippi River navigation channel (Enclosure 2, LRA Reuse Alternative Phase 1, Short Reach). In addition to the Short Reach, the LRA update includes dredging north from Commander's Pond in Brickhouse Slough, between the mainland and Apple River Island, to connect Brickhouse Slough with

the Upper Mississippi River navigation channel and includes a turning basin (Enclosure 3, LRA Reuse Alternative Phase 1, Short and Long Reaches). Other than the addition of the Long Reach dredging, phases 1, 2, and 3 remain the same.

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

Illinois Natural Areas Inventory (INAI)
Savanna Army Depot

State Threatened or Endangered Species
Blanding's Turtle *(Emydoidea blandingii)*[1]
Butterfly (*Ellipsaria lineolata*)
Higgins Eye (*Lampsilis higginsii*)
James' Clammyweed (*Polanisia jamesii*)
Pallid Shiner (*Hybopsis amnis*)
Plains Hog-nosed Snake (*Heterodon nasicus*)
Sheepnose (*Plethobasus cyphyus*)[1]
Weed Shiner (*Notropis texanus*)
Western Sand Darter (*Ammocrypta clara*)

Based on the proposed changes to the reuse alternative, 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 continues to recommend 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 surveys, 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.

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.

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.

[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.

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.

The following concerns have also been identified by the Department:

Interagency Wetland Policy Act

If this project involves any state-awarded funding, it will need to be reviewed for compliance with Title 17 *Illinois Administrative Code* Part 1090 of the *Interagency Wetland Policy Act.* If state funding and impacts to wetlands in the vicinity of the project are anticipated, this information should be provided to the Department for concurrence on mitigation requirements to ensure compliance with the Illinois Interagency Wetland Policy Act.

IDNR Office of Resource Conservation, Contaminant Assessment Section

The IDNR Office of Resource Conservation, Contaminant Assessment Section (CAS) supports the position presented by the IL DNR Consultation program. CAS works closely with the IL EPA and USFWS in response to abandoned, uncontrolled hazardous waste sites per CERCLA, and has and will continue to coordinate with IL EPA, USFWS, and US EPA as necessary. CAS recognizes and supports IL EPAs position presented in the letter of January 31, 2024, including, the preservation of the remedy, finalization of an environmental covenant relative to land use controls, and possible additional investigation related to perfluoroalkyl substances. Also, as IL EPA notes in their August 6, 2025, letter, CAS reiterates that no estimate of dredging depth or volume is included in the update; therefore, the environmental impact may not be fully evaluated in the latest LRA proposed plan.

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

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July 22, 2025

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REFERENCE: SHPO Log #005022420

Ms. CJ (Carol) Wallace, Cultural Resources Coordinator
Illinois DNR, Attn: State Historic Preservation Office
1 Natural Resources Way
Springfield, IL 62702

Dear Ms. Wallace:

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BRAC Program Manager
HQDA/ODCS G-9

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Mr. Zachary Krug, Illinois State Hazard Mitigation Officer
Illinois Emergency Management Agency
1035 Outer Park Drive
Springfield, IL 62704

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Mr. Kent Collier, NAGPRA
Kickapoo Tribe of Oklahoma
105365 S. Hwy 102
McLoud, OK 74851

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Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

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

July 22, 2025

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Ms. Susan Tiger, NAGPRA Representative
Kickapoo Tribe of Oklahoma
105365 S. Hwy 102
McLoud, OK 74851

Dear Ms. Tiger:

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Chairman Darwin Kaskaske
Kickapoo Tribe of Oklahoma
105365 S. Hwy 102
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Mr. William Quackenbush, THPO
Ho-Chunk Nation of Wisconsin
W9814 Airport Rd.
Black River Falls, WI 54615

Dear Mr. Quackenbush:

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Mr. Logan York, HPO, Miami Tribe of Oklahoma

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

July 22, 2025

SUBJECT: Update to the LRA Reuse Alternative for the 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

Ms. Melissa Wiatrolik, THPO
Little Traverse Bay Bands of Odawa Indians, Michigan
7500 Odawa Circle
Harbor Springs, MI 49740

Dear Ms. Wiatrolik:

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Sincerely,

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Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

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Chairperson Regina Gasco-Bentley
Little Traverse Bay Bands of Odawa Indians, Michigan
7500 Odawa Circle
Harbor Springs, MI 49740

Dear Chairperson Gasco-Bentley:

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Mr. David Grignon, THPO
Menominee Indian Tribe of Wisconsin
W2908 Tribal Office Loop Rd.
Keshena, WI 54135

Dear Mr. Grignon:

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Mr. Logan York, THPO
Miami Tribe of Oklahoma
3410 P St. NW
Miami, OK 74354

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

July 22, 2025

SUBJECT: Update to the LRA Reuse Alternative for the 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

Chief Douglas Lankford
Miami Tribe of Oklahoma
3410 P St. NW
Miami, OK 74354

Dear Chief Lankford:

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Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

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Dr. Andrea Hunter, Director and THPO, Historic Preservation Office
The Osage Nation
627 Grandview Ave.
Pawhuska, OK 74056

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cc:
Mr. Travis Black, Director, Inland Waterways Gateway (St. Louis), U.S. Department of Transportation, Maritime Administration
Mr. Ed Britton, District Manager, U.S. Fish and Wildlife Service (USFWS), Upper Mississippi River National Wildlife and Fish Refuge, Savanna District Office
Mr. Johnathon Buffalo, Tribal Historic Preservation Officer (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, Native American Graves Protection and Repatriation Act (NAGPRA), Kickapoo Tribe of Oklahoma

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

July 22, 2025

SUBJECT: Update to the LRA Reuse Alternative for the 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

Chairperson Tiauna Carnes
Sac & Fox Nation of Missouri in Kansas and Nebraska
305 North Main St.
Reserve, KS 66434

Dear Chairperson Carnes:

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If you have input regarding resources of concern to your agency or any questions concerning this BRAC action, please contact Todd Knuth, SVADA Base Environmental Coordinator, by email at william.t.knuth.civ@army.mil; by mail at the address provided in the letterhead; or by phone at 815-273-8312. We respectfully request that you submit any input you wish to provide within 30 calendar days of receipt of this letter.

Sincerely,

LINEER.THOMAS.ALDEN.1172258375 Digitally signed by LINEER.THOMAS.ALDEN.1172258375 Date: 2025.07.17 11:04:15 -04'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

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Ms. Sandra Massey, THPO
Sac & Fox Nation, Oklahoma
920963 South Highway 99
Stroud, OK 74079

Dear Ms. Massey:

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Sincerely,

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Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

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Principal Chief Randle Carter
Sac & Fox Nation, Oklahoma
920963 South Highway 99
Stroud, OK 74079

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Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

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Chairman Vern Jefferson
Sac & Fox Tribe of the Mississippi in Iowa
349 Meskwaki Rd.
Tama, IA 52339

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Sincerely,

LINEER.THOMAS.ALDEN.1172258375
Digitally signed by LINEER.THOMAS.ALDEN.1172258375
Date: 2025.07.17 11:04:15 -04'00'

Thomas Lineer
BRAC Program Manager
HQDA/ODCS G-9

Enclosures

cc:
Mr. Travis Black, Director, Inland Waterways Gateway (St. Louis), U.S. Department of Transportation, Maritime Administration
Mr. Ed Britton, District Manager, U.S. Fish and Wildlife Service (USFWS), Upper Mississippi River National Wildlife and Fish Refuge, Savanna District Office
Ms. Tiauna Carnes, Chairperson, Sac & Fox Nation of Missouri in Kansas and Nebraska
Mr. Randle Carter, Principal Chief, Sac & Fox Nation, Oklahoma
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Mr. Logan York, HPO, Miami Tribe of Oklahoma

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

July 22, 2025

SUBJECT: Update to the LRA Reuse Alternative for the 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

Ms. Sunshine Thomas-Bear, THPO
Winnebago Tribe of Nebraska
920 N. Mission Dr.
Winnebago, NE 68071

Dear Ms. Thomas-Bear:

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