



Draft Environmental Assessment

Ottawa Elementary School District #141 New Intermediate School

City of Ottawa, Illinois
July 2010



FEMA

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APPENDICES A, B, AND C

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Appendix A Figures

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Acronyms

ADA	Americans with Disabilities Act
A/E	architectural and engineering firm
APE	Area of Potential Effects
BMP	Best Management Practice
BRRTS	Bureau for Remediation and Redevelopment Tracking System
CAA	Clean Air Act
CDB	Capital Development Board (State of Illinois)
CEQ	Council on Environmental Quality
CFR	Code of Federal Regulations
CO	carbon monoxide
COM ED	Commonwealth Edison
CWA	Clean Water Act
dB	decibel
EA	Environmental Assessment
EcoCAT	Ecological Compliance Assessment Tool (by IDNR)
EIS	Environmental Impact Statement
EO	Executive Order
ESA	Endangered Species Act
ESD#141	Elementary School District #141 (City of Ottawa, IL)
FEMA	Federal Emergency Management Agency
FIRM	Flood Insurance Rate Map
FONSI	Finding of No Significant Impact
FPPA	Farmland Protection Policy Act
IDNR	Illinois Department of Natural Resources
IDOA	Illinois Department of Agriculture
IDOT	Illinois Department of Transportation
IDPH	Illinois Department of Public Health
IEMA	Illinois Emergency Management Agency
IEPA	Illinois Environmental Protection Agency
IHPA	Illinois Historic Preservation Agency
ISBE(ROE)	Illinois State Board of Education, Regional Office of Education
KTDS	Kalwall Translucent Daylighting Systems
LEED	Leadership in Energy & Environmental Design
NAAQS	National Ambient Air Quality Standards
NAGPRA	Native American Graves Protection and Repatriation Act
NEPA	National Environmental Policy Act
NFIP	National Flood Insurance Program
NHPA	National Historic Preservation Act
NO2	nitrogen dioxide

NPDES	National Pollutant Discharge and Elimination System (permit)
NRCS	Natural Resources Conservation Service (local field office of USDA)
NRHP	National Register of Historic Places
O ₃	ozone
OSHA	Occupational Safety and Health Administration
Pb	lead
PM _{2.5}	particulate matter less than 2.5 microns
PM ₁₀	particulate matter less than 10 microns
PNA	polynuclear aromatic compounds
RCRA	Resource Conservation and Recovery Act
ROE	Regional Office of Education (Illinois State Board of Education)
SHPO	State Historic Preservation Officer
SO ₂	sulfur dioxide
SWPPP	Stormwater Pollution Prevention Plan
THPO	Tribal Historic Preservation Officer
USACE	U.S. Army Corps of Engineers
USDA	U.S. Department of Agriculture (local field office is NRCS)
USEPA	U.S. Environmental Protection Agency
USFWS	U.S. Fish & Wildlife Service
VOC	volatile organic compound

1.0 INTRODUCTION

1.1 PROJECT AUTHORITY

The Ottawa Elementary School District #141 (ESD#141) in the City of Ottawa, Illinois has applied through the Illinois Emergency Management Agency (IEMA) to the Federal Emergency Management Agency (FEMA) for funding assistance. This funding is for temporary relocation of elementary school students, and replacement of a flooded elementary school with a new Intermediate School facility. In accordance with 44 Code of Federal Regulations (CFR) for FEMA, Subpart B, Agency Implementing Procedures, Part 10.9, this Environmental Assessment (EA) is being prepared pursuant to Section 102 of the National Environmental Policy Act (NEPA) of 1969, as implemented by the regulations promulgated by the President's Council on Environmental Quality (CEQ); 40 CFR Parts 1500-1508. The purpose of the EA is to analyze the potential environmental impacts of the proposed project, and to determine whether to prepare an Environmental Impact Statement (EIS) or a Finding of No Significant Impact (FONSI).

The applicant has requested an Improved Project to construct a new facility outside of the floodplain, then interpretation of 44 CFR 9206.226 Restoration of Damaged Facilities, and DAP 9527.4 Construction Codes and Standards, in addition to guidance provided by FEMA Headquarters Public Assistance staff, and that the costs for the repair of the flooded facility and the elevation for compliance with the local floodplain ordinance are eligible for reimbursement as an Improved Project. ESD#141 must obtain approval for the Improved Project from the District Superintendent, Illinois State Board of Education, Regional Office of Education (ISBE, ROE) prior to the start of construction. Federal funding for this Improved Project is limited to the Federal share of the costs that would be associated with repairing and elevating the flooded facility, or the actual costs of completing the Improved Project, whichever is less. The remaining funding balance for the Improved Project is a non-Federal responsibility. A new building in a different location from the damaged facility requires FEMA approval prior to construction.

1.2 BACKGROUND

The City of Ottawa, in LaSalle County, is a community located in north-central Illinois, (Appendix A1) approximately 80 miles southwest of the Chicago metropolitan area. Within this area are the major national and state transportation corridors of I-80/I-39, US 6, Illinois State Highways 23/71, the Illinois Railnet and CSX Transportation railroad lines, and the Illinois Waterway, a dam-lock-controlled major waterway along the Illinois River connecting Lake Michigan with the Mississippi River. Over the weekend of September 12, 2008, floodwaters from heavy rains overflowed at the confluence of the Fox and Illinois rivers, flooding the Central Elementary School site, (Appendix A2) as well as the building first floor and crawlspace. The flooded Central School is in the floodplain of the Illinois River, located at 400 Clinton Street, for approximately 400 5th and 6th grade students. ESD#141 cancelled school for the 400 students while Central School was being dried out. Classes resumed on September 17, 2008, in makeshift spaces at McKinley, Jefferson, and Lincoln schools within the ESD#141 boundaries in Ottawa. As it became apparent that damage to the building far exceeded simply drying out and cleaning, ESD#141 determined the temporary solution to distribute the 400 students among those schools was not going to be adequate for the estimated time span of resolving where/when the students would resume classes in one location. ESD#141 then took steps to temporarily relocate Central School's 5th grade population to space donated by the Church of Nazarene, and the 6th grade population to portable classroom units placed at Shepherd Middle School, both within the City of Ottawa. The extent of the damage to Central School was not immediately determined.

In October 2008, the City of Ottawa organized a town hall meeting with school officials, legislators, community officials, representatives from FEMA, Illinois Department of Natural Resources (IDNR), and

Illinois Department of Public Health (IDPH) to discuss damages to Central School and the future placement of the students. In a February 11, 2009, City of Ottawa letter (Appendix B1) to the ROE concerning Central School, the inspector declared, "...this structure is declared **Substantially Damaged** and must be brought into compliance with the city's Floodplain Ordinance prior to repair and reoccupation." Following a February 17, 2009 inspection of Central School, the IDPH Chief Engineer wrote (Appendix B2a & B2b) to the ROE "to ensure the protection of all building occupants, the cleanup of the asbestos containing pipe insulation, asbestos containing spray on ceiling and assumed asbestos containing floor tile materials shall be conducted following all the rules and regulations of the Asbestos Abatement Act (105 ILCS) and Code (77 Ill. Adm. Code 855)." On February 24, 2009, the ROE Regional Superintendent declared (Appendix B3a & B3b) an Order of Condemnation to ESD#141, stating it...."is hereby ordered to make such repairs or alterations as necessary to effect full compliance with the applicable provisions of the Health/Life Safety Code for Public Schools." FEMA agreed with the substantial damage claim on the flooded school and to an alternate project to relocate the school outside of the floodplain. Once FEMA agreed with the Substantial Damage claims on the building made by the City of Ottawa and the ROE, then funding coverage was evaluated by FEMA. ESD#141 proceeded to look for alternatives to repair/raise Central School at its present location.

In Spring 2009, ESD#141 reached an agreement with Wal-Mart Corporation to sub-lease a shuttered building just outside the district's boundaries for an interim Central School facility. Temporary measures to convert the building to house Central School's students were made, and classes began on schedule in fall 2009 and continued throughout the school year.

After reviewing and evaluating numerous properties, the ESD#141 chose the 46 acres adjacent to Shepherd Middle School along the outskirts of Ottawa for construction of a new school. This site provides the required acreage per ISBE guidelines for Central School's replacement facility and offers an area for potential future growth. In November 2009, ESD#141 decided to put a February 2010 referendum before the Ottawa voters to offset any shortfall from either FEMA or the State of Illinois in the funding for a replacement site and building. This referendum passed with a greater than 63 percent approval. On May 11, 2010, ESD#141 was awarded a State of Illinois construction grant (Appendix B4) from the Capital Development Board (CDB) for approximately \$14.6 Million dollars.

The new school (Proposed Action) is currently in the design phase with ESD#141's architect and engineering firm (A/E). Construction at the new site is anticipated to begin in late Summer 2010, with an anticipated occupancy at the end of 2011. The Community Development Department of the City of Ottawa is working with the ESD#141 and A/E to develop a suitable Site Plan while helping them through the required annexation process of the 46 acres into the City of Ottawa.

2.0 PURPOSE AND NEED

FEMA will help the applicant (ESD#141) to fund replacement of the flooded Central School with construction of a new school at a new location out of the floodplain. The new school is needed to provide a long-term solution to the temporary placement of the students at their present location. The new school will meet the needs of the existing students, with a slight capacity enlargement over the old school to accommodate future ESD#141 growth. The new facility will provide an up-to-date, safe and secure school facility for 5th and 6th grade students, serving the school district area in and immediately surrounding the City of Ottawa, Illinois.

3.0 ALTERNATIVE ANALYSIS

3.1 ALTERNATIVE 1 – NO ACTION (Remain in Existing Building)

Under the No Action Alternative, the ESD#141 would remain in the existing, converted Wal-Mart building (Appendix A3) and continue to use it for housing the student population from the flooded Central School. The district subleased the 26 year old building from Wal-Mart Corporation for the duration of the Wal-Mart lease, through the end of 2011. As part of the sublease, payments are made to Wallace Township, because the building is just outside of the ESD#141 boundaries. The building is located at 2828 Emerald Drive, Ottawa, IL in a commercial area bordered on the north and south by strip mall shopping, to the east by a large parking area and gas station, and immediately to the west by a ditch. Before occupying the building, the existing facility was slightly modified with temporary improvements to the interior: primary cleaning, removal of old equipment and carpets, constructing partial height partitions to define classroom space, and minimal new wall construction for offices, a new toilet room and nurse station, minimal food service area, and slight changes to the mechanical, electrical, and all fire sprinkler systems. The modifications were a temporary measure, and do not meet current ISBE permanent school facility requirements.

A long-term alternative considered in keeping the student population of the building is to renovate the facility for permanent use as a school by ESD#141. However, this alternative is not being pursued because of the following:

- The existing building, even with the initial modifications, does not meet with strict ISBE school facility requirements that would be required for a permanent school facility.
- The modified mechanical, electrical, and lighting systems were not updated to take into account the control of individual spaces within the building. The building was originally constructed as an open floor plan, retail store with appropriate mechanical, electrical, and lighting systems. These systems would need additional upgrading.
- While the overall square footage of the building is almost adequate for the student population, the interior spaces are not. For example, in order to accommodate a gymnasium, the roof would either need to be raised, or an addition constructed on a lot that currently has no room for expansion. ISBE occupancy modifications would have to be met for a permanent school facility.
- The site size and configuration is not conducive to exterior play areas and play fields, as there are no grass fields for recreating areas.
- Located in a commercial zone on the extreme northern edge of Ottawa, the site is remote from any residential areas making pedestrian access to the site problematic. In addition, the location at the north edge of Ottawa is the furthest area away from the projected future residential growth of the city. Transportation costs to bus students would be higher than the Proposed Action.
- The costs associated with converting the existing building to meet ISBE building codes and purchase the property would be similar to building a new facility (Proposed Action). One of the cost cutting measures driving ESD#141 to vacate this property by the end of 2011, is to avoid additional leasing costs of this building.
- ESD#141 would incur additional costs for temporary housing of the students while making the building a permanent facility.
- ESD#141 would have to petition the ROE to annex the building property into ESD#141 boundaries. The same property would have to be removed from the Wallace School District #195 boundaries. This might not be possible.

3.2 ALTERNATIVE 2 – PROPOSED ACTION (New Intermediate School)

Under the Proposed Action, construction of a new Intermediate School facility (Appendix A4) will provide a new home for the displaced 5th and 6th grade students that previously attended the flooded Central School. ESD#141 has purchased approximately 46 acres of undeveloped agricultural land

adjacent to the districts' Shepherd School. Of the 46 acres, the new 97,663 square foot (sf), Intermediate School facility would be located on the northern-most 26 acre tract of this land bounded on the north by the Shepherd Middle School and East McKinley Road; on the south by the remaining 20 acres of the tract; on the east by unimproved farm fields; and on the west by the partially developed residential, South Ridge Subdivision Phase 1 and undeveloped land. The new site is located in the Northwest Section 24, Township 33 North, Range 3, East of the Third Principal Meridian, with geographic coordinates of 41° 19' 19.6" N, 88° 49' 45.78" W. No wetlands, floodplains, or waterways are located adjacent to the project site. The nearest waterway is the Illinois River, about 1.1 miles to the north and more than 130 feet lower than the project site elevation. A map showing the project site for the new Intermediate School in relation to the City of Ottawa and the Illinois River is provided in Appendix A5.

Before beginning construction, an individual(s) will be designated for emergency response. The individual(s) shall be available to repair and maintain erosion control devices on a 24 hour per day basis. Erosion control measures shall be in accordance with the procedures and standards for urban soil erosion and sedimentation control, Best Management Practices (BMP), and follow "The Standard Specifications for Road and Bridge Construction in Illinois." Where possible, erosion control measures will be installed prior to the commencement of any earth disturbing activity. Any remaining measures must be installed as soon as reasonably possible after grading operations begin.

During construction, the general contractor shall be responsible for conducting inspections of the erosion control system as required by the National Pollutant Discharge Elimination System (NPDES) permit and Storm Water Pollution Prevention Plan (SWPPP). A notice of intent will be submitted to the Illinois Department of Agriculture (IDOA) or the Illinois Environmental Protection Agency (IEPA) in sufficient time to allow for a 30 day review prior to the anticipated start of construction operations.

Positive drainage will be provided at all times within the construction areas. Water will not be allowed to drain or pond onto surrounding property. The grading contractor is responsible for examining all erosion control measures once each week and after each rainfall totaling over ½ inch. Erosion control measures shall be maintained or, if needed, replaced so they will function as originally designed. The contractor shall notify the ESD#141 and the City of Ottawa Soil Erosion Inspector and report the status of all erosion control measures. Erosion control inspection records shall be kept detailing all activities and inspections throughout the course of construction activities. In an effort to limit potential soil erosion as required by the site SWPPP, the following is a sequence of grading activity and temporary sediment control measures:

- Place silt fence at the toe of unseeded/unsodded slopes during construction. Additional silt fence may be required for proper erosion control.
- Once final subgrade elevations are obtained, paving operations can proceed. Maintain straw bales and silt fencing during paving operations as much as practical.
- Temporary stock piles shall be graded to drain with a maximum side slope of 3 horizontal to 1 vertical.
- Upon completion of paving and landscaping operations contractor shall clean storm sewer systems of debris and silt.
- Erosion control system is to be maintained by the contractor after each rainfall event and throughout the course of the project, and removed upon project completion after an adequate stand of grass has been established.

The grading contractor is responsible for maintaining adequate erosion control measures and records until paving operations are complete. It is then the building contractor's responsibility to maintain adequate erosion control measures until no less than 70% permanent ground cover is achieved, at which time all temporary erosion control measures shall be removed. Once all temporary erosion control measures are removed, a notice of discontinuation of construction activity shall be filed. For temporary

seeding or inactivity of 14 days, the entire area that was disturbed shall be seeded with a mixture of oats and annual rye grass. At the conclusion of the grading operations, permanent seeding shall be placed per city specifications.

Existing vegetation and root zone will be stripped to a minimum depth of 16" within construction limits. Approximately 55,000 cubic yards of topsoil will be temporarily removed from proposed parking lot areas, bus turn-a-round, retention pond, and building footprint areas. Topsoil will be stockpiled within the disturbed areas, then used for various construction activities (i.e. for the retention pond), with any excess spread on-site prior to seeding. No topsoil is anticipated to be hauled off-site. Compaction material will meet engineering requirements in accordance with article 205.05 of "The Standard Specifications for Road and Bridge Construction in Illinois."

The building foundation will consist of steel reinforced concrete footings set on aggregate pier foundations (Geopiers) of a columnar-type configuration for support of foundation loads. The base floor will consist of a 5-inch concrete slab and will be placed on 6-inches of granular fill; all slabs will be reinforced with 1.5 pounds of polypropylene fibers per cubic yard of concrete.

All utilities, water, storm water, sewer and electrical will connect to existing services located on the adjacent properties. These connections will be to utilities under East McKinley Road just east of Shepherd Middle School and/or to city utilities under the currently unused road (just south of the South Ridge Subdivision) at the southwest edge of the 26 acres site. All utility trenches will be excavated with a width of 12-18 inches on each side of the pipe. Water lines require a 5-foot minimum depth of cover. The various utility contractors will:

- Excavate, place and backfill approximately 1,022 linear feet (lf) of 4-inch and 2,542 lf of 8-inch water lines.
- Excavate, place and backfill approximately 1,350 lf of 12-inch, 560 lf of 18-inch, 520 lf of 24-inch, and 300 lf of 30-inch storm water drains.
- Excavate, place and backfill approximately 135 lf of 4-inch, 80 lf of 6-inch, and 1,120 lf of 8-inch sewer lines

Excessive storm water runoff that cannot be handled by city connections will flow into an approximately 210 lf x 260 lf detention pond along the southwest portion of the 26 acre site, which may retain up to approximately 2.64 foot-acres of water. The detention pond will have a restrictor plate which will allow for a maximum, flow rate discharge of approximately 2.4 cubic feet per second, to the city storm sewer.

The General Contractor (GC) will:

- Coordinate exact routing of outdoor lighting branch circuits, communication systems, and site utilities where underground work is indicated, prior to any construction.
- Coordinate site work of other trades and review civil utility plans for locations of existing utilities.
- Locate and mark existing underground utilities, prior to any construction.
- Coordinate the exact routing of Commonwealth Edison (COM ED) primary conductors and the location of COM ED transformers with COM ED representatives.
- Coordinate exact routing of secondary service with GC.
- Coordinate the exact routing of communication conduits with telephone service provider.
- Coordinate the height of electrical manhole installed in paved areas so it is flush with pavement elevation.

The new Intermediate School building will be a 97,663 square foot (sf) facility consisting of 76,426 sf on the first floor and 21,237 sf on the second floor, with a height not to exceed 35 feet in accordance with the City of Ottawa's A-2 Zoning requirements. The building will be of a masonry shell construction with a combination of masonry bearing walls and steel frame supported roof structure. Exterior walls will be brick and stone faced, with doors, windows, and Kalwall Translucent Daylighting Systems (KTDS). KTDS is a translucent fenestration system whose primary element is structural composite sandwich panels that extracts and converts free energy from the sun to heat, cool, and/or naturally light the building; saving energy usage by the facility.

Design of the building will comply with all Leadership in Energy & Environmental Design (LEED) construction controls and criteria as required to facilitate the achievement of a LEED Silver certified building. LEED is an internationally recognized green building certification system providing third-party verification that a building or community was designed and built using strategies aimed at improving performance across all the metrics that matter most: energy savings, water efficiency, CO₂ emissions reduction, improved indoor environmental quality, and stewardship of resources and sensitivity to their impacts.

The facility will have 142 standard parking spaces, with five Americans with Disabilities Act (ADA) spaces. The parking lot will be connected with the adjacent Shepherd Middle School parking lot, reducing the overall footprint and utilizing the same exit onto East McKinley Road. A separate bus loading and unloading area from the parking lot area, exiting further east onto East McKinley Road, will be implemented in order to increase student and parent safety. During construction, the parking and bus areas will be used as staging areas for materials and disposal items. After recycle considerations, disposal of construction materials would be to the LandComp Landfill, Permit #023, located at 2840 E. 13th Road, about 3 miles due west of downtown Ottawa.

The Proposed Action will relocate an old Schoolhouse built in 1855 with an accompanying Privy, a Washington Memorial Bell from 1855, and the Washington School Cupola, along with other miscellaneous items (i.e. picnic tables) from the flooded Central School grounds to the new Intermediate School site.

The southern portion of the 26 acre site will include a soccer field, with separate baseball and softball diamonds.

3.3 ALTERNATIVE 3 – ELEVATION OF CENTRAL SCHOOL (Flooded Facility)

This alternative would clean-up, repair, and elevate the flooded Central School, located at 400 Clinton St., Ottawa, IL above the base flood elevation (Appendix A6). Students would return to the facility after clean-up of the facility; and all conditional issues involving ROE, IDPH, applicable permits, and floodplain requirements (i.e. raising the building out of the floodplain) are met.

Following the flooding in September 2008, efforts were made to assess the damage to Central School. It took several months to accurately determine the amount of damage to the building caused from the flooding. The flooding caused extensive water damage, and asbestos contamination within the crawl space and first floor of the building. The primary asbestos related clean-up issues faced at Central School include:

- Damaged floor tile and mastic in multiple locations throughout the building as a result of direct contact with water, as well as a prolonged period of high humidity.
- Water damaged pipe insulation in the crawlspace.
- Contaminated soils throughout the crawlspace as a result of the damaged/deteriorated pipe insulation.

- Water damaged acoustical plaster in the auditorium.

If the building were to be re-occupied, all elements of the Asbestos Hazard Emergency Response Act (AHERA) for schools would be required to be followed, including specific Illinois Department of Public Health (IDPH) Regulations. The requirement to continue to manage in place or remove the materials would be driven by the condition of the materials and/or potential impact from construction/renovation activities. For example; the extent of the damage to the floor tile would require that it be abated and replaced. All friable/regulated asbestos containing materials would need to be encapsulated and removed for disposal. The contaminated condition of the crawlspace would either require sealing of the crawlspace, or applicable clean-up and replacement of insulation in the crawlspace. The asbestos contaminated soil would need to be removed or encapsulated. Removal would be extremely costly due to the space restriction in the crawlspace; encapsulating the floor is problematic due to likely future flooding, and hydrostatic pressure issues with ground water.

The track area and surrounding grounds of the Central school yard was suspected to have contaminates following the September 2008 flood. The track area, due west of the Central School building, used to be owned (more than 50 years ago) by NICOR Inc., who operated a gasification plant there. In 1997, contaminated soil was discovered in the area of the track. NICOR engineered mitigation at that time to remediate contaminates from the track area, and to cover the track area with an engineered barrier, plus increasing the elevation of the track area by adding four feet of soil. Additional clean up evaluations and decisions concerning these contaminated soils would have to occur before returning students to the site.

3.4 ALTERNATIVES CONSIDERED AND ELIMINATED (from further review)

This alternative considers several options that were briefly examined before they were eliminated from further consideration.

One option considered would move the existing Central School building to another location. However, the building is a structural steel frame with masonry and glass exterior walls, and masonry interior walls. The structure would need to be compartmentalized into smaller components to be moved. To move the building off the existing grounds and out of the floodplain would require a minimal elevation change close to 15 feet. These factors contributed to eliminating this option from further consideration

A second option would return students to Central School after clean-up activities with no raising of the building structure, and creating a levee or flood wall along the river side of the facility. However, there is insufficient land available between the school and the current river bank to construct an earthen levee, the process for construction approval from the U.S. Army Corp of Engineers (USACE) would take too long, and compensatory storage related to the elimination of portions of the floodplain all contributed to not giving this option further consideration.

A third option would involve distributing the Central School population among existing schools within ESD#141 and moving those students into yet-to-be purchased, modular housing. However, all of the existing schools in ESD#141 (other than at Shepherd Middle School) are landlocked, meaning they are all surrounded by other development with no room to expand other than expensive buying out from existing land owners. In addition, ROE might not approve of such an option due to overcrowding existing school ground space. Therefore, these factors all contributed to eliminating this option further consideration.

4.0 AFFECTED ENVIRONMENT AND IMPACTS

4.1 PHYSICAL ENVIRONMENT

4.1.1 Geology, Seismicity, and Soils

The project area is located in central LaSalle County in north-central Illinois. The project area is located in an area with minimal earthquake activity as evidenced by the Earthquakes in Illinois 1795-2008 map (Appendix A7) as prepared by the Illinois State Geological Survey. During this time period, only two earthquakes were recorded, both of which occurred well east of Ottawa. LaSalle County is not regarded as one of the counties in Illinois with a high risk for seismic activity. All A/E design will use BMP and follow applicable codes and ordinances.

The topographic quad map for the area (Appendix A8) indicates that the mostly flat 46 acres is close to 600 feet above sea level. This is more than 130 feet above the floodplain level of the flooded Central School along the banks of the Illinois River. The county is comprised mostly of black or brown silt loam. The U.S. Department of Agriculture (USDA), Natural Resources Conservation Service (NRCS) online Soil Survey (USDA 2010) of LaSalle County, Illinois 2010 was consulted (Appendix A9), indicates the proposed project site contains soils consisting mostly of silt loam, with 0 to 5 percent slopes. The Proposed Action is just outside of the corporate limits of the City of Ottawa in LaSalle County, Illinois Ottawa NW Quadrangle Map 56 of 109, which lists the mostly flat soils types, with reference to their characteristics. The soils consist of:

<u>Map Unit Symbol</u>	<u>Soil Types</u>
148 A	Proctor Silt Loam, 0 to 2% slopes
148B	Proctor Silt Loam, 2 to 5% slopes
149A	Brenton Silt Loam, 0 to 2% slopes
152A	Drummer Silty Clay Loam, 0 to 2% slopes
206A	Thorp Silt Loam, 0 to 2% slopes
663B	Clare Silt Loam, 2 to 5% slopes

Soils in the proposed project area are classified as prime farmland, which is generally subject to the Farmland Protection Policy Act (FPPA) of 1981. The FPPA requires that consideration be given to impacts involving the conversion of farmland to non-agricultural uses. An evaluation of the impacts to Federal activities to prime or unique farmlands, or farmlands of unique local or state importance, is required by the implementing regulations 7 CFR 658. Federal agencies may use a Land Evaluation and Site Assessment (LESA) for this evaluation if the NRCS has approved one within the state or local government unit where a project will take place. LaSalle County has an NRCS approved LESA, and the county is authorized to complete a Farmland Conversion Impact Rating form (AD-1006) to assess the potential impact of a Federal activity within the county to prime or unique farmland. Projects with a rating of 225 points or higher are denied, projects from 224-200 points are approved with limitations, and projects rated below 200 points are approved without limitations.

The applicant coordinated with the Illinois Department of Agriculture (IDOA) and the NRCS through the LaSalle zoning office, dated March 8, 2010, and completed AD-1006 (Appendix B5a,b,c,d). This resulted in a site assessment score of 80. In an April 21, 2010 letter, (Appendix B6) the IDOA concurred that the proposed “school construction project meets the intent of the Illinois Farmland Preservation Act.”

Alternative 1 - No Action (Remain in Existing Building) - Under the No Action Alternative, most activities would take place to the interior of the building, and no impacts to geology or soils would occur.

Alternative 2 - Proposed Action (New Intermediate School) - Under the Proposed Action Alternative, construction activities would not be deep enough to impact underlying geologic resources. Short-term impacts to soils would occur during the construction period. Existing vegetation and root zone will be

stripped to a minimum depth of 16" within construction limits. Approximately 55,000 cubic yards of topsoil will be temporarily removed from proposed parking lot areas, bus turn-a-round, retention pond, and building footprint areas. Topsoil will be stockpiled within the disturbed areas, then used for various construction activities (i.e. for the retention pond), with any excess spread on-site prior to seeding. No topsoil is anticipated to be hauled off-site. Appropriate best management practices (BMPs) such as silt fence, prompt planting of vegetation, and completion of landscaping would be used to minimize runoff.

Alternative 3 - Central School (Flooded Facility) - Under this Alternative, clean-up and repair activities would not be deep enough to impact underlying geologic resources. Short-term impacts due to soil disturbance would occur during the clean-up and repair period on the site. Appropriate BMPs such as silt fence, prompt planting of vegetation, and completion of landscaping, as appropriate, would be used to minimize runoff.

4.1.2 Water Resources and Water Quality

The Clean Water Act (CWA), as amended in 1977, established the basic framework for regulating discharges of pollutants into waters of the United States. In addition, Executive Order (EO) 11990 (Protection of Wetlands) requires Federal agencies to avoid, to the extent possible, adverse impacts of wetlands.

Existing site topography is shown on the project topography map (Appendix A8). The 46 acre project site currently is vacant and unused farmland. The topography of the project site is flat with an elevation difference of less than 5 feet, sloping slightly to the southwest. There is no visible surface water detected on the proposed site. The run-off ultimately drains to the Illinois River, more than a mile from the site. There are no known aquifers in the vicinity of the site. A wetland delineation map (Appendix A10) shows the nearest wetland about 1,760 feet to the east of the project site. The Ottawa Water department supplies the city with treated water, and treats sewage waters at their newly upgraded and expanded Water Treatment Plant. A National Pollutant Discharge Elimination System (NPDES) permit will be obtained for this project. A draft Stormwater Pollution Prevention Plan (SWPPP) has been prepared for the Proposed Action.

Alternative 1 - No Action (Remain in Existing Building) - Under the No Action Alternative, no adverse impacts to water resources would occur.

Alternative 2 - Proposed Action (New Intermediate School) - Under the Proposed Action Alternative, there would likely be little to no direct adverse impacts to water resources because the unimproved farmland would be replaced partly by the building and parking lot; however, most of the 26 acres would have grasses planted in place. However, temporary short-term impacts to the City of Ottawa water system could occur during the construction period because of altered site runoff and additional soil erosion. Following construction, excessive storm water runoff that cannot be handled by city connections will flow into an approximately 210 lf x 260 lf detention pond along the southwest portion of the 26 acre site. The detention pond may retain up to approximately 2.64 foot-acres of water following excessive storm events. The detention pond will have a restrictor plate which will allow for a maximum, flow rate discharge of approximately 2.4 cubic feet per second, to the city storm sewer. To reduce impacts to surface water, the applicant would implement appropriate BMPs, such as installing silt fences and prompt replanting of bare soils.

Excessive storm water runoff that cannot be handled by city connections will flow into an approximately 210 lf x 260 lf detention pond along the southwest portion of the 26 acre site, which may retain up to approximately 2.64 foot-acres of water following excessive storm events. The detention pond will have a

restrictor plate which will allow for a maximum, flow rate discharge of approximately 2.4 cubic feet per second, to the city storm sewer.

Alternative 3 - Central School (Flooded Facility) - Under this Alternative, reoccupying the school would have no direct permanent impacts to surface waters. However, temporary short-term impacts to downstream surface waters could occur because of potential soil erosion. To reduce impacts to surface water, the applicant would implement appropriate BMPs, such as installing silt fences and prompt replanting of bare soil areas.

4.1.3 Floodplain Management

Executive Order (EO) 11988 (Floodplain Management) requires Federal agencies to avoid direct or indirect support of development within the 100-year floodplain whenever there is a practicable alternative. Specifically, EO 11988 prohibits federal agencies from funding construction in the 100-year floodplain unless there are no practicable alternatives. FEMA's regulations for complying with EO 11988 are promulgated in 44 CFR Part 9.

FEMA uses Flood Insurance Rate Maps (FIRMs) to identify the regulatory 100-year floodplain for the National Flood Insurance Program (NFIP). The flooded Central School, adjacent to the Illinois River, is located within the 100 year floodplain. The proposed project site is located outside of the 100-year floodplain, with an elevation more than 130 feet above the Illinois River.

Alternative 1 - No Action (Remain in Existing Building) - Under the No Action Alternative, no impacts to the floodplain would occur.

Alternative 2 - Proposed Action (New Intermediate School) - Under the Proposed Action, best available data from FIRM Map #17099C0530 E, dated September 7, 2001 (Appendix A11) shows the proposed new school location within zone X, well out of the 100 year floodplain. No impacts to the floodplain would occur.

Alternative 3 - Central School (Flooded Facility) - Under this Alternative, best available data from revised FIRM Map #17099c0530 E, dated March 10, 2009 (Appendix A12) shows Central School within zone AE, the 100 year floodplain. In addition, conversations with the city Floodplain Manager and ESD#141 Superintendent have indicated that the Central School area has been flooded more than a half dozen times within the last 20 years. Clean-up and raising the existing facility would need to be constrained so that future impacts to the 100-year floodplain would be avoided.

4.1.4 Air Quality

The Clean Air Act (CAA) requires that states adopt ambient air quality standards. The standards have been established to protect the public from potentially harmful amounts of pollutants. Under the CAA, the U.S. Environmental Protection Agency (USEPA) establishes primary and secondary air quality standards. Primary air quality standards protect the public health, including the health of "sensitive populations, such as people with asthma, children, and older adults." Secondary air quality standards protect public welfare by promoting ecosystems health, and preventing decreased visibility and damage to buildings and crops. The EPA has set national ambient air quality standards (NAAQS) for the following six criteria pollutants: ozone (O₃), particulate matter (PM_{2.5}, PM₁₀), nitrogen dioxide (NO₂), carbon monoxide (CO), sulfur dioxide (SO₂), and lead (Pb). According to USEPA (USEPA 2010), LaSalle County and the project area is in an attainment area (Appendix A13) for particulate matter.

Alternative 1 - No Action (Remain in Existing Building) - Under the No Action Alternative, there would be only temporary impacts to air quality during mostly interior remodeling/construction activities.

Alternative 2 - Proposed Action (New Intermediate School) - Under the Proposed Action, short-term impacts to air quality would occur during construction activities. To reduce impacts, the construction contractors would be required to wet down construction areas as needed to mitigate fugitive dust. Emissions from fuel-burning engines (e.g., heavy equipment and earthmoving machinery) could also temporarily increase the levels of some of the criteria pollutants, such as CO, NO₂, O₃, PM₁₀, and noncriteria pollutants such as volatile organic compounds (VOCs). To mitigate these emissions, BMPs would be used such as run times for fuel-burning equipment would be kept to a minimum and equipment would be properly maintained.

Alternative 3 - Central School (Flooded Facility) - Under this Alternative, short-term impacts to air quality would occur during clean-up and repair at the existing facility. All elements of the Asbestos Hazard Emergency Response Act (AHERA) for schools would be required to be followed, including specific IDPH and ROE regulations and requirements. The requirement to continue to manage in place or remove the materials would be driven by the condition of the materials and/or potential impact from construction/renovation activities. For example; the extent of the damage to the floor tile would require that it be abated and replaced. All friable regulated, asbestos containing materials would need to be encapsulated and removed for disposal. The contaminated condition of the crawlspace would either require sealing of the crawlspace, or applicable clean-up and replacement of insulation in the crawlspace. The asbestos contaminated soil would need to be removed or encapsulated. To reduce impacts, the construction of demolition contractors would be required to wet down construction areas as needed to mitigate fugitive dust. Emissions from fuel-burning engines (e.g., heavy equipment and earthmoving machinery) could also temporarily increase the levels of some of the criteria pollutants, such as CO, NO₂, O₃, PM₁₀, and noncriteria pollutants such as VOCs. To mitigate these emissions, fuel-burning equipment run times would be kept to a minimum and equipment would be properly maintained.

4.2 BIOLOGICAL ENVIRONMENT

4.2.1 Terrestrial and Aquatic Environment

The proposed project site just outside of the city limits is an undeveloped farm field along the southern edge of Ottawa. According to area residents, the site and surrounding lands to the east and south have been in agricultural production for at least the past 50 years; bounded on the north by Shepherd Middle School since 1969 and East McKinley Road; and on the west by the partially developed residential, South Ridge Subdivision Phase 1. Wildlife common to rural agricultural land, including song birds and small mammals, have been observed in the area. There is no ponding water on the mostly flat project site.

On March 1, 2010, an IDNR Ecological Compliance Assessment Tool (EcoCAT) was used to evaluate the potential presence of wetlands, waterways, or endangered species resource impacts at the project site (Appendix B7a,b). Search of the Illinois Heritage Database resulted in “no record of State-listed threatened or endangered species, Illinois Natural Area Inventory site, dedicated Illinois Nature Preserves, or registered Land and Water Reserves in the vicinity of the project location...The National Wetlands Inventory does not show wetlands within 250 feet of the project location.” Because the site and surrounding area have been farmed and/or developed, the area would be considered to have limited value for plant and wildlife species.

Alternative 1 - No Action (Remain in Existing Building) - Under the No Action Alternative, there would be no impacts to the terrestrial or aquatic environments.

Alternative 2 - Proposed Action (New Intermediate School) - Under the Proposed Action, impacts to area terrestrial and aquatic environments would be of little concern. The nearest stream or wetland would be an unnamed tributary to the Illinois River, located about 1,760 feet to the east. Impacts to the terrestrial environment would result from the development of the site. About 152,000 SY of the site's existing vegetation and topsoil would be disturbed. No endangered resources would be impacted, but some plants would be removed and some animals that make home in undeveloped farmlands would be temporarily displaced. The site's new landscaping will include trees and bushes, and a stormwater retention pond that may provide habitat for wildlife.

Alternative 3 - Central School (Flooded Facility) - Under this Alternative, impact to the terrestrial environment would be minimal. The existing Central School and properties surrounding it are fully developed and consist of commercial and public properties. Potential short-term negative impacts to the aquatic environment of the Illinois River could result during clean-up and repairs. The most likely potential negative impact could result from a decrease in the quality of stormwater runoff from the site.

4.2.2 Wetlands

The USACE regulates the discharge of dredged or filled material into waters of the U.S., including wetlands, pursuant to Section 404 of the CWA. In addition, EO 11990 (Protection of Wetlands) requires Federal agencies to avoid, to the extent possible, adverse impacts on wetlands that may result from federally funded actions. Wetlands in Illinois are also protected by the IDNR.

No wetlands or surface waters have been identified on-site or adjacent to it. The National Wetlands Inventory (USFWS 2010a) mapped the nearest wetland area (Appendix A10) at about 1,760 feet east and upland of the proposed project site. The wetland is associated with an un-named tributary of the Illinois River, which is about 1.1 miles north of the site.

Alternative 1 - No Action (Remain in Existing Building) - Under the No Action Alternative, no impacts to wetlands would occur.

Alternative 2 - Proposed Action (New Intermediate School) - Under the Proposed Action, construction of the building and parking area footprints would need to be constrained to avoid impacts to the wetlands associated with the unnamed tributary to the Illinois River, east of the site. Wetlands closest to the proposed project site (1,760 feet east) are outside and upland of the project area that would be disturbed by grading or filling activities, and would not be directly or indirectly impacted by construction. Use of BMPs would minimize erosion at the site and mitigate potential impacts to water resources in the area. Appropriate BMPs would be required at the construction site including, but are not limited to, the installation of silt fences and the revegetation of bare soils to minimize erosion.

Alternative 3 - Central School (Flooded Facility) - Under this Alternative, no impacts to wetlands would occur because none are present on or near the Central School site. During clean-up and repairs, the use of BMPs would minimize erosion at the site and mitigate potential impacts to the Illinois River. Appropriate BMPs would be required at the site including, but not limited to, the installation of silt fences and the revegetation of bare soils to minimize erosion.

4.2.3 Threatened and Endangered Species

The proposed project site is currently on unused agricultural field. Local government staff and area residents report the site and lands to the east and south have been actively farmed for at least the past 50 years, bounded on the north by Shepherd Middle School since 1969 and East McKinley Road; and on the west by the partially developed residential, South Ridge Subdivision Phase1 and undeveloped land.

Wildlife common to rural agricultural land, including song birds and small mammals, have been observed in the area.

In accordance with Section 7 of the Endangered Species Act (ESA) of 1973, the project area was evaluated for the potential occurrences of federally listed threatened and endangered species. Research was performed using the U.S. Fish & Wildlife Service (USFWS) technical assistance website (USFWS 2010b) to identify any potential federally Threatened, Endangered, Proposed, or Candidate species for LaSalle County, which identified: Indiana Bat (endangered), Leafy-Prairie Clover (endangered), Eastern Prairie Fringed orchid (threatened), Decurrent False Aster (threatened), and Sheepnose Mussel (candidate). The nearest critical habitat for the Indiana Bat within LaSalle County is the Blackball Mine located at 41° 19' 19.6" N, 88° 49' 45.78" W, approximately 11 miles from the project site. No suitable habitat for the federally listed endangered, threatened, or candidate species is present at the proposed project location.

Alternative 1 - No Action (Remain in Existing Building) - Under the No Action Alternative, no impacts to the listed species, their habitats, or proposed or designated critical habitat would occur.

Alternative 2 - Proposed Action (New Intermediate School) - Under the Proposed Action, no impacts to the listed species, their habitats, or proposed or designated critical habitat would occur.

Alternative 3 - Central School (Flooded Facility) - Under this Alternative, no impacts to the listed species, their habitats, or proposed or designated critical habitat would occur.

4.3 HAZARDOUS MATERIALS

No potential hazardous materials were identified or adjacent to, or in the vicinity of, the proposed project site. Until recent development along Highway 23 and Shepherd School, the project area has been farmland for more than 50 years. No subsurface material testing was conducted in the project area as part of this analysis. Conclusions are based on discussions with city and county officials, interviews with local residences, and review of topographic maps and aerial photographs.

On the project site, temporary construction activities will use the planned parking and bus areas as staging areas for construction materials and disposal items. After recycle considerations, disposal of any construction materials would be to the LandComp Landfill, Permit #023, located at 2840 E. 13th Road, about 3 miles due west of downtown Ottawa. All applicable safety plans the site SWPPP would be followed.

In January 2009, ESD#141 had a Phase II Environmental Site Assessment performed (Appendix B8a,b,c,d) with analyzed soil samples from the track and grounds of Central School. This report is on file at the FEMA Region 5 office. The results of the assessment stated, "Seven of the twenty soil samples exceeded Tier 1 residential clean-up objectives for Benzo(a)pyrene. Some of the samples exceeded the Tier 1 standards for other PNA's such as Chrysene, Benzo (a) anthracene and benzo (b) fluorathene. All sample locations that exceeded Tier 1 standards were on the school property. The above compounds are Polynuclear Aromatic (PNA) compounds. Tier 1 standards that are being exceeded are for ingestion risk with direct soil contact." The assessment conclusion stated, "It is not clear what impact the recent flood (September 2008) had on the transport of these (PNA) materials....Inspect the engineered barrier to ensure it is operating as designed....Conduct a Phase 1 survey of the school property to determine the potential for soil impact from past activities." Additional clean up evaluations concerning the contaminated soils have not occurred to date.

Alternative 1 - No Action (Remain in Existing Building) - Under the No Action Alternative, there would be temporary, mostly interior construction activities on the interim school building. Any hazardous materials discovered, generated, or used during construction would be handled and disposed of in accordance with applicable local, State, and Federal regulations. There would be no impacts anticipated related to hazardous materials or waste.

Alternative 2 - Proposed Action (New Intermediate School) - Under the Proposed Action, no hazardous materials or waste related impacts would be anticipated. Proposed construction activities are temporary, and should not expose hazardous materials or produce hazardous wastes. Any hazardous materials discovered, generated, or used during construction would be handled and disposed of in accordance with applicable local, State, and Federal regulations. There would be no impacts anticipated related to hazardous materials or waste.

Alternative 3 - Central School (Flooded Facility) - Under this Alternative, asbestos waste is the primary concern within the main building. In addition, the PNA's identified in the Phase II Environmental Assessment indicated the hazardous materials are within the ground. Clean-up and repair activities would resolve ROE and IDPH issues, with proper handling and disposal of all asbestos and hazardous materials to an applicable, permitted landfill. A Phase I Environmental Site Assessment would be required to further determine the extent of, and proper disposal of all PNA's identified within the facility grounds. Any additional asbestos, hazardous materials discovered, generated, or used during clean-up and repairs would be handled and disposed of in accordance with applicable local, State, and Federal regulations.

4.4 SOCIOECONOMICS

4.4.1 Zoning and Land Use

The proposed project site is located near the southeast quadrant of the intersection of State Highway 23 and East McKinley Road, along the southern edge and just outside the city limits of Ottawa. The proposed project site and surrounding parcels immediately to the east, south, and southwest are undeveloped farm fields. This area currently has no zone designation. To the north of East McKinley Road and partially to the west is residential neighborhood.

The ESD#141 has applied to annex the land into the City of Ottawa. As part of the annexation, details are being worked out concerning sewer, water, utilities, and site planning. The city would zone the proposed site as "A-2" Single Family & Duplex. Schools are allowed in the "A-2" designation as a conditional use per city approval. The Proposed Action is consistent with the City of Ottawa 2002 Comprehensive Master Plan (Ottawa 2002), #4 Sub-Area Illinois Route 23 and Proposed Fosse Road Extension, which foresees residential development in the southern area in and around Ottawa. The Proposed Action is also consistent with the LaSalle County June 2008 Comprehensive Plan (LaSalle 2008) projected future land use for the area, and planned development of neighborhoods. Recent communications with city and county officials have confirmed this approach to future land use for the area.

Alternative 1 - No Action (Remain in Existing Building) - Under the No Action Alternative, permanent city zoning changes would be required, if allowed at all. The property currently is designated "D" Commercial & Light Industrial. Adjacent properties are designated either "D" or "C-3" Special Business. The interim facility was allowed by the city only as a temporary school facility. Making the facility a permanent school facility is not compatible with the City of Ottawa 2002 Comprehensive Master Plan (Ottawa), as the city desires to develop retail business in the area. In addition, ESD#141 would have to pursue the highly political process to petition the ROE to permanently annex the location into ESD#141's boundaries, and remove it from Wallace School District #195's boundaries.

Alternative 2 - Proposed Action (New Intermediate School) - Under the Proposed Action, ESD#141 would apply to the City of Ottawa to annex the 46 acres into its boundaries. Zoning for this property would change from agricultural to the appropriate city designation. Transition of the land use for this property is consistent with both the Ottawa Comprehensive Master Plan and LaSalle County Comprehensive Plan per conversations with city and county officials.

Alternative 3 - Central School (Flooded Facility) - Under this Alternative, the site is located in an area zoned "D". Because the school existed before the city zoning ordinance was adopted, it was considered "legal non-conforming." Since the school facility has been damaged more than 50% of its value, and because the facility has been vacant for more than a year, any use of the land/building must now become "conforming" through city approval. In addition, with the land/building within the 100-year floodplain, use of the land would require approval through both the U.S. Army Corps of Engineers and the City of Ottawa. These zoning approvals are highly unlikely.

4.4.2 Transportation

The extreme northeast side of the project area and Shepherd Middle School border East McKinley Road to the north, and Illinois Route 23 runs north-south through the City of Ottawa, a few hundred feet to the west of the 46 acre site, with Fosse Road bordering the southern portion of the site. The Proposed Action would add traffic numbers to the immediate area. The Illinois Department of Transportation (IDOT) was consulted for a sample of traffic numbers along Route 23 (Appendix B9a,b) close to the intersection of Route 23 and East McKinley Road. Daily traffic numbers just north of the intersection within Ottawa indicate over 15,000 daily vehicle trips, with numbers south of the intersection indicate over 8,800 daily vehicle trips. These numbers include trips associated with Shepherd Middle School. Route 23 is expected to operate at the same level of service for the morning and afternoon peak hours with the addition of the traffic generated by the proposed intermediate school.

Since the proposed new school is adjacent to Shepherd Middle School, ESD#141 plans to combine the use of the nine school busses that currently service Shepherd Middle School with the new school. Bus schedules would be staggered to keep service close to the same number of busses in current use for Shepherd Middle School. Combining the bus service of the two schools, as compared with the separate bus service currently used for Shepherd Middle School on the south side of Ottawa and the bus service provided for the Interim School on the north side of the city, would save 5 to 20 miles per day, per bus route. Bus routes would be shorter by at least 15 to 20 minutes for the south side routes, and between 10 to 15 minutes for the north side routes. Fuel consumption would also decrease.

Alternative 1 - No Action (Remain in Existing Building) - Under the No Action Alternative, there would be short term increases to transportation impacts during construction upgrades, but return to current levels with completion of construction activities.

Alternative 2 - Proposed Action (New Intermediate School) - Under the Proposed Action, there would be a temporary increase in the volume of construction-related traffic in the immediate vicinity of the proposed project site. Because the site is located on south side of Ottawa, construction planning and staging of construction activities would be needed. Traffic disruptions on Route 23 and slower traffic flow would be likely during construction. To mitigate potential delays, most construction vehicles, equipment, and materials would be stored on the new parking lot and bus turnaround areas of the project site. Appropriate traffic control and signage would be utilized. Over the long term, there would be an increase of vehicle traffic at the proposed project site. By combining the two schools' bus service, the impacts from the number of vehicles coming and going from the school area are not expected to significantly increase, while over-all city impacts would decrease.

Alternative 3 - Central School (Flooded Facility) - Under this Alternative, the clean-up and raising of Central School and the associated activities would slightly increase transportation impacts in the short-term, with a return to pre-flood transportation impact levels in the long-term.

4.4.3 Noise

Noise is generally defined as undesirable sound and is federally regulated by the Noise Control Act of 1972 (NCA). Although the NCA gives the USEPA the authority to prepare guidelines for acceptable ambient noise levels, it only charges those federal agencies that operate noise-producing facilities or equipment to implement noise standards. The USEPA guidelines, and those of many federal agencies, state that outdoor sound levels in excess of 55 decibels (dB) are “normally unacceptable” for noise-sensitive land uses such as residences, schools, and hospitals. All temporary construction activities would follow applicable city ordinances.

Alternative 1 - No Action (Remain in Existing Building) - Under the No Action Alternative, only temporary construction activities would increase noise impacts during daylight hours, with no increased long term noise impacts.

Alternative 2 - Proposed Action (New Intermediate School) - Under the Proposed Action, only temporary short-term increases in noise levels would be anticipated during construction. To reduce noise levels during that period, construction activities would be restricted to normal business hours. Equipment and machinery utilized at the site would meet all local, State, and Federal noise regulations. Over the long term, no significant change to noise levels would be anticipated.

Alternative 3 - Central School (Flooded Facility) - Under this Alternative, temporary short-term increases in noise levels would be anticipated during clean-up and repairs. To reduce noise levels during that period, these activities would be restricted to normal business hours. Equipment and machinery utilized at the site would meet all local, State, and Federal noise regulations. Over the long term, vehicle traffic would increase back to pre-flood levels with students returning to Central School.

4.4.4 Public Services and Utilities

Public services to all of the alternative locations are provided by the City of Ottawa. These include police, fire, water, sewer, utilities, and road connections.

Alternative 1 - No Action (Remain in Existing Building) - Under the No Action Alternative, there would be slight increases to public services or utilities during construction improvements made to the existing building. In the short term, interaction with city services would be intermittent supporting construction activities. In the long term, city services would continue to be provided with little impact.

Alternative 2 - Proposed Action (New Intermediate School) - Under the Proposed Action, there would be additions to most public services and utilities in the site area. In the short term, city staff would assist with annexation of the 46 acres into the City of Ottawa, and provide access to roads/water/sewer/utilities as needed during construction. In the long term, the new facility would have a decreased impact on the city because of the close proximity of the new school to Shepherd Middle School where city services are already provided, and the city decreasing services to the interim school facility on the extreme, north end of Ottawa.

Alternative 3 - Central School (Flooded Facility) - Under this Alternative, there would be a return of most public services and utilities to pre-flood service levels.

4.4.5 Environmental Justice

EO 12898 (Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations) mandates that Federal agencies identify and address, as appropriate, disproportionately high and adverse human health or environmental effects of their programs, policies, and activities on minority and low-income populations. Socioeconomic and demographic data for the project area were analyzed to determine if a disproportionate number of minority or low-income persons have the potential to be adversely affected by the proposed project.

The U.S. Census Bureau data for Ottawa, Illinois, states that 91.5% of the population is white, 5.2% Hispanic or Latino, 1.3% African American, 0.83% Asian, 0.13% American Indian or Alaska Native, and 0.93% some other race or two or more races (U.S. Census, 2000). No concentration of minority or low income populations were identified near the proposed project site.

Alternative 1 - No Action (Remain in Existing Building) - Under the No Action Alternative, there would be no disproportionately high and adverse effects on minority or low-income populations.

Alternative 2 - Proposed Action (New Intermediate School) - Under the Proposed Action, there would be no disproportionately high and adverse impacts on minority or low-income populations. Implementation of the Proposed Action would benefit all populations in ESD#141 with planned development in the southern area of Ottawa.

Alternative 3 - Central School (Flooded Facility) - Under this Alternative, there would be no disproportionately high and adverse impacts on minority or low-income populations.

4.4.6 Safety and Security

To minimize risks to safety and human health, all construction activities would be performed using qualified personnel trained in the proper use of the appropriate equipment, including all appropriate safety precautions. Additionally, all activities would be conducted in a safe manner in accordance with the standards specified in Occupational Safety and Health Act (OSHA) regulations. EO 13045, Protection of Children, requires federal agencies to make it a high priority to identify and assess environmental health and safety risks that may disproportionately affect children. Safety and security of all populations would follow all applicable local, State (particularly ROE and IDPH), and Federal regulations.

Alternative 1 - No Action (Remain in Existing Building) - Under the No Action Alternative, temporary building upgrade activities would require the work area to be fenced off from the public to minimize risks to safety and human health. Construction activities would present safety risks to those performing the activities. Appropriate signage and barriers would be in place prior to construction to alert school children, pedestrians, and motorists in the area. Following all safety precautions, activities would impose no disproportionate health and safety risks to children. In the long term, the interim school would return to current safety impacts.

Alternative 2 - Proposed Action (New Intermediate School) - Under the Proposed Action, most construction would occur on unimproved farms fields, with some activity on or close to Shepherd Middle School grounds. The construction area will be fenced off and work areas kept separate from school activities. Construction activities would present safety risks to those performing the activities. Access to the site would be restricted to protect the public and to minimize risks to safety and human health. The appropriate signage and barriers would be in place prior to construction activities to alert school children, pedestrians and motorists of project activities. Following all safety precautions, activities would impose no disproportionate health and safety risks to children.

Alternative 3 - Central School (Flooded Facility) - Under this Alternative, reoccupying Central School would return the facility to typical, ESD#141 safety and security measures.

4.5 HISTORIC AND CULTURAL RESOURCES

In addition to review under NEPA, consideration of effects to historic properties is mandated under Section 106 of the National Historic Preservation Act (NHPA), as amended, and implemented by 36 CFR Part 800. Requirements include identification of historic properties that may be affected by the Proposed Action, typically those within the Area of Potential Effects (APE). Historic properties are defined as archaeological sites, standing structures, or other historic resources listed in or eligible for listing in the National Register of Historic Places (NRHP) (36 CFR 60.4).

As defined in 36 CFR Part 800.16(d), the Area of Potential Effect (APE), “is the geographic area or areas within which an undertaking may directly or indirectly cause changes in the character or use of historic properties, if such properties exist.” In addition to identifying historic properties that may exist in the proposed project’s APE, FEMA must also determine, in consultation with the appropriate State Historic Preservation Officer (SHPO) or Tribal Historic Preservation Officer (THPO), what effect, if any, the action will have on historic properties. Moreover, if the project would have an adverse effect on these properties, FEMA must consult with the SHPO or THPO on ways to avoid, minimize, or mitigate the adverse effect.

During construction, ground disturbing activities would be monitored. Should human skeletal remains or historic or archaeological materials be discovered during construction, all ground-disturbing activities on the project site would cease and the coroner’s office (in the case of human remains), FEMA, and the Illinois Historic Preservation Agency (IHPA) would be notified.

Central School has on its property a small schoolhouse constructed in 1855, a separate small privy of unknown age, a school bell originally used in 1855, and cupola from the previously demolished Washington School. For purposes of this review, these are considered historic properties. FEMA, with the concurrence of the SHPO, has determined that the relocation of these structures and objects will not result in adverse effects on historic properties.

Alternative 1 - No Action (Remain in Existing Building) - Under the No Action Alternative, there will be no impacts to historic or cultural resources.

Alternative 2 - Proposed Action (New Intermediate School) - Under the Proposed Action, moving the small schoolhouse, privy, bell and cupola from the Central School location to the new site will be the only action involving historic or cultural resources. However, movement of these items will have no adverse effects as described in Sections 4.5.1 below.

Alternative 3 - Central School (Flooded Facility) - Under this Alternative, the option to clean-up and raise the school building would cause no impacts to historic or cultural resources.

4.5.1 Historic Structures and Archaeological Resources

FEMA assessed the undertaking’s potential to affect historic properties, including the potential for discovery of archaeological artifacts that might be present in the APE. On February 3, 2010, a FEMA Historic Preservation Specialist visited the site of the existing building and that of the proposed new building. These visual surveys, along with other research conducted regarding historic properties in the vicinity of these project sites, resulted in a determination that no adverse effects to historic properties will

be caused by the demolition of Central School; relocation of the schoolhouse, privy, bell, and cupola to the new site; or by the construction of a new school building (Appendix B10a,b). The SHPO concurred with these findings in a letter of March 23, 2010 (Appendix B11). To safeguard any archaeological resources that may be present below ground on the project sites, all ground disturbing activities shall be monitored. Should human skeletal remains or historic or archaeological materials be discovered during construction, all ground disturbing activities on the project site will cease and the coroner’s office (in the case of human remains), FEMA, and the IHPA would be notified.

4.5.2 Tribal Coordination and Religious Sites

Fifteen federally-recognized Native American Tribes have past land claims in LaSalle County. These tribes received requests (Appendix B12a-o) for evaluation of the presence or absence of known archaeological and religious sites within the proposed project areas. The Peoria Tribe of Indians of Oklahoma responded (Appendix B13) in a letter dated March 11, 2010, that the tribe “has no objection to the proposed construction” of the proposed project. “However, if any human skeletal remains and/or any objects falling under the Native American Graves Protection and Repatriation Act (NAGPRA) are uncovered during construction, the construction should stop immediately, and the appropriate persons, including state and tribal NAGPRA representatives contacted.” To date, no other responses have been received.

4.6 COMPARISON OF ALTERNATIVES

This section describes the potential impacts of the proposed alternatives and the No-Action Alternative. Where potential impacts exist, conditions or mitigation measures to offset these impacts are detailed in the body of the document. A summary table is provided below:

Table 1: Impact and Mitigation Summary		
Affected Environment	Impacts	Mitigation
Geology, Seismicity, and Soils	Alt 1: No impacts to geology or soils.	Appropriate BMPs: silt fence, prompt planting of vegetation and landscaping to minimize runoff.
	Alt 2 (proposed): No impacts to geology, short-term impacts to soils during construction. Construction would temporarily disturb about 55,000 cubic yards at the site.	
	Alt 3: Clean-up of the facility grounds and raise the building would have short-term impacts to soils in the immediate area.	
Water Resources and Water Quality	Alt 1: No impact to water resources. Potable water is supplied to the site by the city.	A NPDES and Stormwater Pollution Prevention Plan (SWPPP) are required. A Stormwater Management and Erosion Control Plan and implementation of stormwater BMPs will minimize runoff.
	Alt 2 (proposed): Short-term impacts to surface water are possible during construction. No impact to ground water resources. Potable water is supplied to the site by the city.	
	Alt 3: Short-term impacts to surface water are possible during clean-up and repairs, with no impact to ground water resources. Potable water is	

Table 1: Impact and Mitigation Summary

Affected Environment	Impacts	Mitigation
	supplied to the site by the city.	
Floodplain Management	Alt 1: No impacts anticipated.	None.
	Alt 2 (proposed): No impacts anticipated.	None.
	Alt 3: The site is bordered by the Illinois River and the associated 100-year floodplain.	Clean-up, repairs, and raising the building would need to be constrained at this site to minimize or avoid impacts to the floodplain.
Air Quality	Alts 1, 2 (proposed), and 3: Short-term impacts from dust and emissions from equipment would occur during construction or clean-up and repairs.	Dust control measures such as watering down construction or demolition areas would be implemented as needed. Fuel-burning equipment run times could be minimized and equipment properly maintained. Applicable asbestos handling and disposal methods would be employed.
Terrestrial and Aquatic Environments	Alt 1: No impacts are anticipated to the terrestrial environment. The site is bordered on three sides by commercial development.	Construction would need to be constrained at this site to minimize or avoid impacts to the ditch.
	Alt 2 (proposed): No impacts are anticipated to aquatic environments. Prior to construction of the structure, parking area, and stormwater retention pond, about 152,00 SY of existing vegetation and topsoil will be stripped from the site, a farm field.	Topsoil will be replaced in areas of the site and landscaping will include grasses, trees, bushes, and retention pond. This will restore some of the terrestrial environment and create a temporary aquatic environment.
	Alt 3: No impacts are anticipated to aquatic environments. During clean-up, repairs, or construction; existing vegetation and topsoil will be disturbed at the site.	Topsoil will be replaced in areas of the site and landscaping might include grasses, trees, and bushes. This would restore some of the terrestrial environment.
Wetlands	Alts 1, 2 (proposed), and 3: No impacts anticipated.	None.
Threatened and Endangered Species	Alts 1, 2 (proposed), and 3: No impacts anticipated.	None.
Hazardous Materials	Alts 1 and Alt 2 (proposed): No impacts anticipated. No hazardous materials are anticipated at either location and no releases of contaminants to the environment have been reported at either site.	Any hazardous materials discovered during project implementation would be handled and disposed of in accordance with applicable local, State, and Federal regulations.

Table 1: Impact and Mitigation Summary

Affected Environment	Impacts	Mitigation
	Alt 3: Potential impacts could be anticipated during clean-up or repair activities in handling asbestos and/or PNA compounds.	
Zoning and Land Use	<p>Alt 1: Short-term impacts would involve changing existing city zoning and land use designations of the site. Long-term impacts would involve redefining the ESD#141 and Wallace School District #195 boundaries.</p> <p>Alt 2 (proposed): Annexation into the city, along with a city zoning designation of the site are required. The proposed use of the site is consistent with city and county planned land use for the area.</p> <p>Alt 3: Impacts would include attempts to get city, ROE, and USACE approvals for reuse of the site as a school facility.</p>	All applicable zoning and land use requirements, and other applicable approvals must be met before future construction or clean-up activities may proceed.
Transportation	<p>Alt 1: Short-term increase in construction-related traffic in the vicinity of the site would occur, with no long-term impact changes.</p> <p>Alt 2 (proposed): Short-term increase in construction-related traffic in the vicinity of the site would occur. Long-term ESD#141-wide impacts would be reduced.</p> <p>Alt 3: Short-term increase in clean-up/construction-related traffic in the vicinity of the site would occur. Long-term impacts of reopening the school would return to pre-flood conditions.</p>	To mitigate potential delays, construction/demolition vehicles and equipment would be stored on-site. There is ample room at the site for equipment and materials staging. Appropriate traffic control and signage would be utilized. No significant adverse impacts to transportation, site access, or traffic levels are anticipated.
Noise	<p>Alt 1: Short-term impacts from construction equipment would occur. No long-term impacts anticipated.</p> <p>Alt 2 (proposed): Short-term impacts from heavy equipment would occur during construction. No significant long-term impacts anticipated.</p> <p>Alt 3: Short-term impacts from clean-up/construction equipment would occur. No long-term impacts anticipated.</p>	All clean-up and/or construction would be limited to normal business hours and associated equipment would meet local, State, and Federal noise regulations.
Public Services and Utilities	Alt 1: No impacts to utilities are anticipated.	None.

Table 1: Impact and Mitigation Summary		
Affected Environment	Impacts	Mitigation
	Alt 2 (proposed): Impacts to public services and utilities would increase to the new facility.	Effective staging and signage for construction equipment and personnel, as well as an increase of services and utilities, to the new facility would be required. Long-term impacts would be similar to current impacts at the interim facility.
	Alt 3: Short-term impacts are anticipated for clean-up/construction activities. Returning students to the facility would restore impacts to pre-flood levels.	Short-term impacts include an increase of services and utilities during clean-up/construction activities. Long-term impacts would be similar to pre-flood condition.
Environmental Justice	Alts 1, 2 (proposed), and 3: No disproportionately high or adverse effect on minority or low-income populations is anticipated.	None.
Safety and Security	Alts 1, 2 (proposed), and 3: Fencing and city protection would needed during clean-up and/or any construction activities. No adverse public safety impacts are anticipated.	Measures would be taken to ensure safe clean-up and/or construction activities, and subsequent safety and security at the new facility would follow applicable requirements.
Historic and Cultural Resources	Alts 1, 2 (proposed), and 3: No impacts anticipated.	None. All ground disturbing activities would be monitored. Should human skeletal remains or historic or archaeological materials be discovered, all ground-disturbing activities on the project site would cease and the coroner's office (in the case of human remains), FEMA, and the Illinois Historic Preservation Agency would be notified.

5.0 CUMULATIVE IMPACTS

According to CEQ regulations, cumulative impacts represent the “impact on the environment which results from the incremental impact of the action when added to other past, present, and reasonably foreseeable future actions, regardless of what agency (Federal or non-Federal) or person undertakes such other actions. Cumulative impacts can result from individually minor but collectively significant actions taking place over a period of time (40 CFR 1508.7).” In accordance with NEPA and to the extent reasonable and practical, this EA considered the combined effect of the Proposed Action and other actions occurring or proposed in the vicinity of the proposed project site.

The Proposed Action would likely spur further residential and business development in the immediate area of south Ottawa. This development in the area already is projected in, and compatible with, the Ottawa and LaSalle County Comprehensive land use plans; therefore, no significant cumulative impacts are anticipated.

6.0 PUBLIC PARTICIPATION

FEMA is the lead Federal agency for conducting the NEPA compliance process for the Ottawa ESD#141 New Intermediate School in the City of Ottawa, LaSalle County, Illinois. It is the goal of the lead agency to expedite the preparation and review of NEPA documents, as well as be responsive to the needs of the community and the purpose and need of the proposed action, while meeting the intent of NEPA and complying with all NEPA provisions.

Inter-government consultation and reviews have been conducted in the form of letters and responses, in-person and telephone conversations, emails with the applicable entities, and internet references. Governments consulted are listed in Section 7. Government responses are provided in Appendix B. Additional project information is available at the FEMA Region 5 Office or the ESD#141 Superintendent Office in Ottawa.

The proposed project has been discussed at numerous Ottawa School District Board Meetings that are open to the public on a monthly basis. In addition, the project has been presented in several public forums through the City of Ottawa. Extensive articles and commentary mostly for the proposed project were published in the local newspaper. The public participation for this project culminated in the successful February 2, 2010 city Referendum to approve funding for the remaining portion of the new intermediate school.

The ESD#141 will notify the public of the availability of the draft EA through publication of a public notice (Appendix C) in a local newspaper. FEMA will conduct a public comment period commencing on the initial date of publication of the public notice.

7.0 GOVERNMENT COORDINATION AND PERMITS

The following government entities and organizations were contacted and/or consulted, which helped to provide project information and/or review in support of preparation for this EA. Relevant documentation received to date are included in Appendix B, or reside in the FEMA Region 5 and/or ESD#141 Superintendent Office.

1. Illinois Emergency Management Agency (Curtis Caldwell)
2. Illinois Department of Agriculture, Bureau of Land and Water Resources (Steven Chard)
3. Illinois Department of Natural Resources, Division of Ecosystems & Environment
4. Illinois Department of Public Health (Justin DeWitt)
5. Illinois Department of Transportation, District 3 (Thomas Magolan; Kathy Bishop)
6. Illinois Historic Preservation Agency, Deputy State Historic Preservation Officer (SHPO)
7. Illinois State Board of Education, Regional Office of Education Superintendent (Rich Meyer)
8. State of Illinois, Capital Development Board (James Riemer, Sr.)
9. Peoria Tribe of Indians Oklahoma, Tribal Historic Preservation Officer (THPO)
10. City of Ottawa (Michael Sutfin, Inspector; David Noble, Engineer; Tami Huftel, Planner)
11. Ottawa Elementary School District #141 (Craig Doster)

12. La Salle County, Environmental Services and Land Use (Michael Harsted, Director; Mathew Stafford, Supervisor of Field Operations)
13. Aires Consulting Group, Inc. (Lawrence Leonardi, Jr. and Geoffrey Bacci)
14. Green Associates (George Reigle)

In accordance with applicable local, State, and Federal regulations, the applicant would be responsible for acquiring any necessary permits prior to commencing construction at the proposed project site. The following permits and approvals may be required prior to construction:

1. Building permits (ISBE and ROE)
2. Site Plan and associated Annexation approvals for water, sewer, utilities, and street connections (City of Ottawa)
3. Stormwater Pollution Prevention Plans and Erosion Control permits (IDNR and LaSalle County)
4. Sanitary inspection/permits (IDPH)
5. NPDES permit (IEPA)

8.0 REFERENCES

The following government references were used as guidance and/or consulted, which helped to provide project information and/or perspective in support of preparation for this EA. Other references used to support project-specific details (i.e., A/E requirements and ROE requirements) for the Proposed Action reside in the FEMA Region 5 and/or ESD#141 Superintendent Office.

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<http://www.cityofottawa.org/zoninggov.htm>. Accessed February 2010.

9.0 LIST OF PREPARERS

Preparation and quality control review of Draft and Final EA:

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APPENDICES A, B, and C

APPENDICES REFERENCES

Appendix A: Figures

- A1 Ottawa, Illinois Map Location
- A2 September 2008 Flooding of Central School
- A3 Interim School Facility
- A4 Proposed Action Site Plan
- A5 Proposed Action Site in Ottawa Vicinity
- A6 Central School Site
- A7 Earthquakes in Illinois Map
- A8 Proposed Action Site Topography Map
- A9 Proposed Action Site Soil Map
- A10 Proposed Action Site Wetland Map
- A11 Proposed Action Site FIRM Map
- A12 Central School FIRM Map
- A13 Attainment Area Map

Appendix B: Government Consultations

- B1 City of Ottawa Letter
- B2a Illinois Department of Public Health Letter
- B2b Illinois Department of Public Health Letter (continued)
- B3a Illinois State Board of Education, Regional Office of Education Letter
- B3b Illinois State Board of Education, Regional Office of Education Letter (continued)
- B4 Capital Development Board Letter
- B5a Farmland Conversion Impact Rating Submittal
- B5b Farmland Conversion Impact Rating Submittal (continued)
- B5c Farmland Conversion Impact Rating Submittal (continued)
- B5d Farmland Conversion Impact Rating Submittal (continued)
- B6 Illinois Department of Agriculture, Bureau of Land and Water Resources Letter
- B7a Ecological Compliance Assessment Tool (EcoCAT) Review
- B7b Ecological Compliance Assessment Tool (EcoCAT) Review (continued)
- B8a Phase II Environmental Site Assessment for Central School
- B8b Phase II Environmental Site Assessment for Central School (continued)
- B8c Phase II Environmental Site Assessment for Central School (continued)
- B8d Phase II Environmental Site Assessment for Central School (continued)
- B9a Illinois Department of Transportation Traffic Counts (North)
- B9b Illinois Department of Transportation Traffic Counts (South)
- B10a FEMA Region 5, Environmental Officer Letter
- B10b FEMA Region 5, Environmental Officer Letter (continued)
- B11 Illinois Historic Preservation Agency, Deputy State Historic Preservation Officer (SHPO) Letter
- B12a-o Tribe Notification letters
- B13 Peoria Tribe of Indians of Oklahoma Letter

Appendix C: Public Notice

- C1 Public Notice for Draft Environmental Assessment Review

APPENDIX A : FIGURES

See App. A file

APPENDIX B: GOVERNMENT CONSULTATIONS

See App. B file

APPENDIX C : PUBLIC NOTICE

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