

**Decision Notice  
and  
Finding of No Significant Impact  
for  
Midwin Demolition and Removal of Unneeded and Unsafe Facilities and Structures**

**USDA Forest Service  
Midwin National Tallgrass Prairie  
Will County, Illinois**

**Introduction**

This project fulfills the need to remove a portion of physical facilities and structures built by the Army in order to facilitate prairie restoration goals at Midwin National Tallgrass Prairie (Midwin). Although a Final Land and Resource Management Plan (Plan) has not been finalized, the Midwin enabling legislation (Illinois Land Conservation Act of 1995) states that the Forest Service may conduct management activities at Midwin prior to completion of the Plan. Demolition and removal of unneeded and unsafe facilities and structures are consistent with the “Analysis of Management Situation” (July 1999) objective of managing for a large unfragmented grassland habitat, pending compliance with the following criteria for interim projects listed in the “Notice of Intent to Prepare an Environmental Impact Statement for the Land and Resource Management Plan, 1998”:

1. The Forest Service must determine that the environmental conditions of the site where the activity may occur meet the standards necessary for the activity.
2. The activity does not interfere with Army cleanup operations as directed in the legislation (2913 [e][1]).
3. The activity does not represent an irretrievable commitment of resources (i.e., a project can be “undone” with relative ease and minimal finances) unless it is necessary for safety or resource protection purposes.
4. The activity represents a valid, existing right as provided by the legislation (Section 2911[f]).

Implementation of Alternative 1 will not preclude options for future land uses in the Proposed Plan alternatives and will comply with the direction outlined in the Illinois Land Conservation Act.

Demolition and removal of unneeded and unsafe facilities and structures are necessary to help ensure the safety of Midwin workers and potential unsupervised visitors in the future. These structures are public safety hazards and/or attractive nuisances. They also have a negative effect upon the natural resources at Midwin, presenting an obstacle to prairie restoration through habitat fragmentation, stream damage, and degrading the visual landscape.

## **Decision**

After consideration of the environmental effects displayed in the Environmental Assessment for Demolition and Removal of Unneeded and Unsafe Facilities and Structures, I have decided to implement Alternative 1. Specifically, I have decided to demolish a number of designated structures, remove and appropriately dispose of waste materials, and regrade and seed the demolition sites in order to prepare these sites for future prairie and stream restoration, consistent with the goals of the Proposed Plan. The structures designated for demolition consist of 22 transite warehouses, 14-15 brick warehouses, 25 trestles and bridges, up to 8 bunkers, 57 other buildings and structures, approximately 3,000 power poles, and above ground water line appurtenances. Some of these structures are clustered together while others are isolated. Demolition and removal of structures over the next five years will occur as budget permits or as partnering opportunities occur.

Areas impacted around the buildings and structures proposed for demolition will be minimized to that needed for demolition and removal. Typically, these areas will not exceed 100 feet around the perimeter of all buildings, bunkers, bridges, and trestles; and 50 feet around telephone poles and above ground water line appurtenances with the exception of water tower bases, in which the area of impact will not exceed 100 feet.

The methods employed for demolition of the designated structures will vary in relation to the type of structure, its location, the materials of construction, and contractor experience.

Solid waste generated by the demolition of the above structures will be disposed of at an off-site licensed commercial waste disposal facility. Certain materials, such as scrap metal, bricks, or wood may be recycled, depending on market conditions and economics.

Site stabilization will occur at all sites after demolition and removal has been completed. Erosion and sediment control will take place during demolition, using best management practices. Sites will be regraded to contour (as feasible) with available soil. Topsoil will be added as needed and available. Regrading will eliminate site erosion, soil loss, and drainage problems.

Sites will be revegetated with cool season grasses that are specified by the Forest Service, for instance, Kentucky bluegrass and redtop clover.

Structures proposed for demolition and removal were historically documented in a report completed in 1995 in preparation for eventual disposal activities. The FS is complying with direction provided in a 1993 Programmatic Agreement prepared by the Army and concurred with by the Advisory Council on Historic Preservation, the Illinois State Historic Preservation Officer, and State Historic Preservation Officers from other states with similar military facilities, that these facilities and structures may be removed.

## **Rationale for the Decision**

In making this decision I considered the direction and intent of the 1995 Illinois Land Conservation Act, whereby the Forest Service may conduct management activities prior to a Land and Resource Management (Plan) to promote the purposes for which Midewin was established. Demolition and removal of unneeded and unsafe facilities and structures are consistent with the "Analysis of Management Situation" (July 1999) objective of managing for a large unfragmented grassland habitat (EA p. 4). My

selection was also based on the need for removal of facilities that promote substantial environmental damage at Midewin.

Alternative 1 meets the project objective (EA p. 4) to remove buildings and structures that present a potential safety hazard to the public and present an obstacle to prairie restoration in which the goal is to protect/enhance habitat for sensitive plant and animal species. It also meets the secondary objective to accomplish these land management objectives in a cost-effective manner.

Existing bridges and trestles are causing erosion of stream banks and facilitating the buildup of debris that interferes with the free flow of Prairie, Grant, Jordan, and Klingler creeks. Alternative 1 will remove debris dams and restore natural flows. Bridge removal will allow for the restoration of natural creek flow, provide greater flood storage, and facilitate wetland/riparian restoration (EA p 17).

Because of ongoing salvage and cleanup operations, much of Midewin is closed to the general public (EA p. 20). Alternative 1 will provide for the beginning of the removal of unsafe and unneeded facilities and structures, facilitating the opening of additional Midewin lands to public recreation over the next five years. It will also help create the vast open grassland vistas typical of tallgrass prairies (EA p 21).

In areas surrounding the structures proposed for demolition most of the habitat for sensitive plant and animal populations has been strongly altered through ancillary construction of roads, railroads, and fences. These areas have also been altered through agricultural operations (EA p 22). The overall results of the demolition program to be conducted under Alternative 1 will promote creation of additional habitat for management under the existing grassland management program (EA p. 34). This additional habitat may benefit the following sensitive grassland bird species: Henslow's Sparrow, Short-eared Owl, Northern Harrier, Upland Sandpiper, and migrant Loggerhead Shrike (EA pp. 31-33).

Alternative 1 conforms to all action alternatives presented in the Proposed Plan for Midewin and will not preclude options for future land uses provided in the Proposed Plan alternatives. Alternative 1 also complies with the four criteria for "interim projects" cited in the Introduction on page 1 of this decision:

1. The environmental conditions of the site where the activity occur meet the standards necessary for the activity. The buildings and structures proposed for demolition are a potential safety hazard to the public and present an obstacle to prairie restoration in which the goal is to protect/enhance habitat for sensitive plant and animal species. Existing bridges and trestles are causing erosion of stream banks and facilitating the buildup of debris that interferes with the free flow of Prairie, Grant, Jordan, and Klingler creeks. Alternative 1 will alleviate these problems. It will also promote improved environmental conditions through stabilizing, regrading, and revegetating the sites with cool season grasses prior to final restoration.
2. Midewin will coordinate activities with Army cleanup operations.
3. While this project represents an irretrievable commitment of resources that could not be "undone" with relative ease and minimal finances, I believe that this demolition project is necessary for safety and resource protection purposes.

4. The demolition of unneeded and unsafe structures represents a valid activity that is consistent with the enabling legislation and subsequent established criteria for Midewin.

### **Other Alternatives That Were Considered**

#### **Alternative 2 (No Action)**

I did not select this alternative, which would leave the sites in their current degraded condition. The enabling legislation for Midewin envisioned restoration of a tallgrass prairie rather than preservation of abandoned and deteriorating building complexes (EA p. 10).

By leaving the unneeded and unsafe bridges, trestles, and culverts in place, the No Action Alternative would allow debris accumulation that prohibits natural creek flow and creates persistent erosion. Creosote treated timbers would remain in the creeks, potentially affecting water quality (EA p. 17).

With regards to recreation, the No Action alternative would retain two existing bridges that traverse Prairie Creek, bridges 16 and PC-3, which currently provide deer hunters within the River Road Hunting Area access across the creek. Deer numbers within the River Road and Bunker Hunting areas would likely be higher under the No Action Alternative than under Alternative 1, as no habitat would be altered and no noise generated (EA p. 22).

The No Action Alternative would leave unsafe and unneeded buildings and structures in place. These same features would block views and disrupt the vast, open grassland vistas typical of the tallgrass prairie. Much of Midewin would remain closed to recreation for public safety reasons (EA p. 22).

The No Action Alternative is not expected to affect sensitive plant and animal populations at Midewin. However, continued habitat fragmentation may limit the distribution of Sullivant's Coneflower, the range of the Henslow's Sparrow, and restrict the foraging areas of the Northern Harrier and Short-eared Owl. The No Action Alternative could also restrict habitat expansion for the Upland Sandpiper, Bobolink, and Migrant Loggerhead Shrike (EA pp. 31-34).

#### **Public Involvement**

Public involvement in this project and decision were invited in a December 8, 2000, scoping notice sent to approximately 600 people and organizations. On March 1, 2001, a letter requesting comments on the Environmental Assessment (EA) was made available to the public and sent to approximately 600 interested parties. Hard copies of the EA were mailed to approximately 80 individuals and organizations. Information on the proposed demolition project was published in the Midewin Quarterly issues for October-December, 2000 and Spring 2001.

#### **Mitigation Measures**

The Environmental Assessment, pages 27-29, outlines numerous mitigation and monitoring measures that will be implemented as part of this decision. We have effectively used these mitigation measures in years past to reduce or eliminate adverse

effects on different resources. We anticipate continued effectiveness of the mitigation measures listed below.

The following mitigation measures will be included in demolition contractor specifications:

- Access to facilities to be demolished is to be confined to existing roads via the shortest route, unless the Forest Service specifically approves an alternative route.
- Dust suppression will be employed during demolition, traffic, and debris handling.
- Areas disturbed will be minimized and kept to that needed for demolition and removal of facilities and structures. Typically these areas will not exceed 100 ft. around the perimeter of all buildings, bunkers, trestles, and bridges, and 50 ft. around telephone poles and aboveground water line appurtenances, with the exception of water tower bases in which the area of impact will be 100 ft. unless the Forest Service approves additional area. Fencing or temporary flagging will mark the perimeter of the work zone.
- All channel work will be conducted at low flow. Debris nets will be used to capture wood with creosote. Removal of silt accumulations will take place after work is completed.
- Stockpiling of debris will be only within the work perimeter or other FS approved area. Stockpiling of woody debris for chipping may occur at the transite warehouse site. It will be confined to the already disturbed areas on and between the warehouse foundations. Debris will be removed from the site shortly after its temporary placement.
- Some restrictions will be applied to the dates of demolition.
  - Any concrete bunker demolition will be restricted to the period of August through March, so as not to interfere with the nesting activities of the nearby Migrant Loggerhead Shrike, Upland Sandpiper and Bobolink.
  - Bridge and trestle demolition will be restricted conducted during the lower flow months of July through October or during other low flow time periods, so as to coincide with the lowest flows of the year.
- Access to Prairie Creek from the south bank will be restricted to the existing railbed. Debris will not be placed on the south bank. The operation of heavy equipment in the creekbed will be minimized to only that operation needed for debris removal.
- In order to minimize the cost of landfilling lumber, unsalvageable wood may be chipped at a central location and trucked to a landfill off-site or recycled. This

wood may include bridge timbers, debris dams, building construction materials, and power poles. As feasible, crushing clean cement into coarse aggregate/granular fill materials for recycling will also be considered.

- Site stabilization will take place at all disturbed sites. Erosion and sediment control during demolition will be conducted using best management practices. Streambank stabilization will occur at all bridge sites where demolition takes place.
- Grading, using topsoil or fill available following structure removal, will take place in preparation for restoration work. The goal is to create the desired topography, soil profiles, and drainage patterns to support restoration efforts. Site stabilization using a vegetative cover of a cool season grass mixture such as Kentucky bluegrass or redtop clover will be implemented on all disturbed sites.

The following additional measures will be applied:

- In order to ensure that species of concern are not impacted adversely, Forest Service staff may perform a field survey of each demolition site prior to the actual demolition. In the event that a species of concern is considered likely to be impacted, appropriate restrictions will be placed on the demolition process. The demolition contract will include a clause to ensure sufficient flexibility for additional environmental protection that may be needed.
- The Forest Service may leave in place a few wooden power poles, to serve as hunting perches for large raptors. Where cross-arms are present, these will also be left. An inspection of existing poles, looking for telltale droppings, will aid in identifying which poles will be left standing.
- The Forest Service will monitor the demolition work frequently to ensure adherence by the contractor to all environmental stipulations.
- The Forest Service will monitor vegetation restoration of the demolition sites, especially where buildings are removed, to ensure the success of resulting habitat.

### **Finding of No Significant Impact**

Based on the interdisciplinary environmental analysis, review of the National Environmental Policy Act (NEPA) criteria for significant effects, and knowledge of the expected impacts, I have determined that this action does not pose a significant effect upon the quality of the human environment and is not a major federal action. Therefore, an Environmental Impact Statement is not indicated for demolition and removal of unneeded and unsafe facilities and structures at Midewin. This determination is based on the following factors:

#### **Context:**

Alternative 1 is within the context (here a local action) of the 1995 Illinois Land Conservation Act, which allows the Forest Service to conduct management activities

at Midewin prior to completion of a Plan. Demolition and removal of unneeded and unsafe facilities and structures is also consistent with the “Analysis of Management Situation” (July 1999) objective of managing for a large unfragmented grassland habitat.

**Intensity:**

The severity of the environmental effects of the proposed demolition and removal activities, considered alone or cumulatively with other effects, were tested against the following ten criteria listed in the NEPA regulations, 40 CFR 1508.27:

1. In reaching my conclusion of no significant impact, I recognize that this demolition project may have some impact on the land. However, there are no significant effects either individually or cumulatively, which would preclude implementation of the demolition work. Negative effects are limited to the potential for temporary stream sedimentation associated with trestle and bridge removal, temporary dust generation, and a possible short-term decrease in deer hunting success in existing hunting areas.
2. This action does not pose a substantial question of significant effect upon public health and safety. The areas where individuals have raised concerns about public health and safety involve the demolition of structures with transite wall and roof panels. Our demolition proposal, contractor stipulations, and monitoring procedures will comply with the asbestos National Emission Standards for Hazardous Air Pollutants.
3. There are no significant adverse effects to prime farmlands, floodplains, wetlands, Wild and Scenic rivers, Wilderness Areas, or ecologically sensitive areas. At Midewin there are no Wilderness Areas, and no Wild and Scenic rivers. This project will not impact ecologically sensitive areas. Wetlands and floodplains are protected through mitigation measures and will not be adversely affected. Demolition and removal of unsafe and unneeded facilities and structures will have no effect on lands classified as prime farmland.
4. The effects on the quality of the human environment are not expected to be highly controversial. I believe we have addressed the known significant biological, social, and economical issues sufficiently to avoid scientific controversy over the scope and intensity of effects. Based upon reports and discussions with professional resource specialists there is agreement by my staff and other professionals consulted about the conclusions and effects identified in this analysis.
5. There are no known effects on the human environment that are highly uncertain or involve unique or unknown risks.
6. No precedents are established as a result of the decision being made. The demolition and removal of unsafe and unneeded facilities and structures,

- including those that are contributing to environmental damage, are specific to the Midewin National Tallgrass Prairie. Future proposals within the area or in surrounding areas can be analyzed on their merits and implemented or not, independent of the action currently proposed.
7. There are no known cumulative adverse effects associated with demolition and removal of unsafe and unneeded facilities and structures and other past or reasonably foreseeable projects implemented or planned within the project area.
  8. These project sites have been extensively disturbed and used for industrial purposes in the past. Heritage resource specialists have inventoried the area, reviewed and compiled information, and determined that heritage resources will not be impacted. Written and photo documentation of historic buildings, structures, and equipment were completed by the Army in 1995 in preparation for eventual disposal activities.
  9. The Biological Assessment and evaluation prepared for this project, which is available to the public at our office, found that there would be no adverse effects to federally endangered or threatened species within the proposed sites.
  10. The actions in this decision do not violate federal, state or local laws or regulations imposed for the protection of the environment.

#### **Findings Required By Other Laws**

Demolition and removal of unneeded and unsafe facilities and structures are consistent with the Illinois Land Conservation Act, 1995, the National Historic Preservation Act, the Archaeological Resources Protection Act, and the Endangered Species Act.

#### **Project Implementation**

Implementation of this decision may occur on, but not before, five business days from the close of the appeal filing period. If an appeal is filed, implementation may not occur for 15 days following the date of appeal disposition (36 CFR 215.10). Implementation means conducting ground-disturbing actions described in this decision.

#### **Appeal Rights**

This decision is subject to the USDA Forest Service process for administrative review pursuant to 36 CFR 215.7, by those who provided comments or otherwise expressed an interest in this particular proposal. Written notice of appeal to remand or reverse this decision must be fully consistent with 36 CFR 215.14 "Content of Appeal," and must be submitted within 45 days of publication of the legal notice of this decision in the Joliet Herald newspaper to:

USDA Forest Service, Eastern Region (R9)  
Attn: Appeals Deciding Officer  
310 West Wisconsin Ave, Suite 500  
Milwaukee, WI 53203

Detailed records of the Environmental Assessment are available for public review at USDA Forest Service, Midewin National Tallgrass Prairie, 30071 S. State Route 53, Wilmington, IL 60481. For additional information concerning this decision or the Forest Service appeal process, contact Enid Erickson, NEPA Coordinator, at the Midewin office or at (815) 423-6370.

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FRANK KOENIG, Prairie Supervisor

April 20, 2001  
Date

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