



October 15, 2025

Helene Roberts
Office Manager, Townsend Engineering
2224 East 12th Street,
Davenport, IA 52803

**RE: RI Casino 10 Acres
Consultation Program
EcoCAT Review #2512041
Rock Island County**

Dear Mrs. Roberts:

The Department has received your submission for this project for the purposes of consultation pursuant to the *Illinois Endangered Species Protection Act* [520 ILCS 10/11], the *Illinois Natural Areas Preservation Act* [525 ILCS 30/17], and Title 17 *Illinois Administrative Code Part 1075*.

The proposed action consists of the construction of a gas station and commercial developments with associated utilities, paving, and pedestrian access-ways (41.461°, -90.618). This response supersedes the previous EcoCAT response to the project dated April 22, 2025. In that response the Department recommended a survey for Blanding's Turtle be conducted. Since that response, new information has become available requiring an updated response from the Department.

The Illinois Natural Heritage Database shows the following protected resources may be in the vicinity of the project location:

Illinois Natural Areas Inventory (INAI)
Mississippi River - Andalusia Slough

State Threatened or Endangered Species

Higgins Eye (*Lampsilis higginsii*)

Butterfly (*Ellipsaria lineolata*)

Blanding's Turtle¹ (*Emydoidea blandingii*)

¹ This species was not indicated to be in the vicinity of the project by the Illinois Natural Heritage Database, however, it was added to the list of species being reviewed for this project based on historic records in the project area, potential suitable habitat in the project area, and new information provided to the Department.

Due to the project scope and proximity to protected resources the Department offers the following comments and recommends the following actions be taken to avoid adversely impacting listed species and natural areas in the vicinity of the project:

Mississippi River - Andalusia Slough INAI Site

EcoCAT indicates this project is in the vicinity of Mississippi River - Andalusia Slough INAI Site. The Department recommends impacts to Mississippi River - Andalusia Slough INAI Site be avoided, however, if impacts cannot be avoided, the Department recommends the following to minimize impacts to this site:

- Any required night lighting should follow International Dark-Sky Association's (IDA) Five Principles for Responsible Outdoor Lighting to minimize the effect of light pollution on wildlife: [Five Principles for Responsible Outdoor Lighting | DarkSky International](#)
- Soil erosion and sediment control BMPs should be implemented and properly maintained. If erosion control blanket is to be used, wildlife-friendly plastic-free blanket should be used to prevent the entanglement of native wildlife. If wildlife-friendly plastic-free blanket cannot be used, then the plastic erosion control blanket should be removed once vegetation is established.
- Oil-water separators be installed on all parking lot drains and regularly maintained.
- Naturalized permeable basins and swales should be included in the design.
- Good housekeeping practices should be implemented and maintained during and after construction to prevent trash and other debris from inadvertently blowing or washing into nearby natural areas.
- All equipment, including but not limited to boots, tools, equipment, tires, and treads, should be cleaned of all debris prior to entry of the project area in order to avoid spreading of exotic or invasive plant seeds into the INAI site.
- A long-term invasive species management program should be considered to minimize the spread of invasive species.
- The project proponent should consider native plantings in the landscape design, when feasible.

Higgins Eye and Butterfly Mussels

The Department has determined that adverse impacts to these species are unlikely.

Please note that due to the federal status of the Higgins Eye, and its potential occurrence in the project area, coordination with the U.S. Fish and Wildlife Service may be necessary and is separate from this consultation and Illinois State regulations.

Blanding's Turtle

A Blanding's Turtle survey was conducted between May 29th, 2025, and June 18th, 2025. No Blanding's Turtles or other State-listed turtles were encountered during the survey effort, and the Department has not been able to voucher any reported observations of Blanding's Turtles in the project area. However, personnel working on site should be educated about the Blanding's Turtle. Photos of juvenile and adult Blanding's Turtles should be posted at a central location. State-listed species may not be handled without the appropriate permits pursuant to the *Illinois Endangered*

Species Protection Act. If Blanding's turtles are encountered, crews should stop work immediately, allow the turtle to move out of the way and contact IDNR at (217) 785-5500.

Please note that that protections for Bald Eagles and migratory birds fall to the U.S. Fish and Wildlife Service (USFWS) through authorities granted under the *Bald and Golden Eagle Protection Act* and *Migratory Bird Treaty Act*. Coordination with the USFWS may be required.

Given the above recommendations are adopted, the Department has determined that impacts to these protected resources are unlikely. The Department has determined impacts to other protected resources in the vicinity of the project location are also unlikely.

In accordance with 17 Ill. Adm. Code 1075.40(h), please notify the Department of your decision regarding these recommendations.

Consultation on the part of the Department is closed, unless the applicant desires additional information or advice related to this proposal. Consultation for Part 1075 is valid for two years unless new information becomes available which was not previously considered; the proposed action is modified; or additional species, essential habitat, or Natural Areas are identified in the vicinity. If the action has not been implemented within two years of the date of this letter, or any of the above listed conditions develop, a new consultation is necessary.

The natural resource review reflects the information existing in the Illinois Natural Heritage Database at the time of the project submittal and should not be regarded as a final statement on the project being considered, nor should it be a substitute for detailed site surveys or field surveys required for environmental assessments. If additional protected resources are unexpectedly encountered during the project's implementation, the applicant must comply with the applicable statutes and regulations.

This letter does not serve as permission to take any listed or endangered species. As a reminder, no take of an endangered species is permitted without an Incidental Take Authorization or the required permits. Anyone who takes a listed or endangered species without an Incidental Take Authorization or required permit may be subject to criminal and/or civil penalties pursuant to the *Illinois Endangered Species Act*, the *Fish and Aquatic Life Act*, the *Wildlife Code* and other applicable authority.

The Department also offers the following conservation measures be considered to ensure protection of native wildlife and enhance natural areas in the project area:

- Install exclusionary silt fence by the end of March and maintained to prevent wildlife from entering the construction area. Conduct daily inspections during construction to ensure that exclusionary fencing is properly installed (dug into the ground) and to check if wildlife is present.
- After construction, the Department recommends permanent fencing and gates, or other exclusionary devices, be installed in such a manner as to exclude native wildlife from accessing the site, since normal operational activities are may adversely impact native wildlife. Fencing should be buried a minimum of 6 inches in the ground.

- Cover trenches at the end of each workday. Before starting each workday, trenches and excavations should be routinely inspected to ensure no native wildlife have become trapped within them.

Please contact me with any questions about this review.

Sincerely,



Bradley Hayes

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