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**Terracon.com**

October 17, 2025

Rymak Construction  
208 18<sup>th</sup> Street  
Suite 206  
Rock Island, Illinois

Attn: Mr. Jeff Hughbanks  
(309) 428-9197  
[Jeffhughbanks94@gmail.com](mailto:Jeffhughbanks94@gmail.com)

**Re: Summary of Environmental Studies**  
Milan Bottoms / Bally West Development  
±10 Acres of Land  
Rock Island, Rock Island County, Illinois  
Terracon Project No. CJ257097 and JN257152

Dear Mr. Hughbanks:

The following summarizes detailed environmental studies conducted by Terracon Consultants, Inc. (Terracon) for the project site and current agency review status to date. Please refer to the following previously submitted reports for further information:

- Species of Greatest Conservation Need Turtle Survey Report  
Dated: August 5, 2025  
Terracon Project Number: JN257152
- Bald Eagle Nest Survey  
Dated: July 14, 2025  
Terracon Project Number: CJ257097
- Aquatic Resources Delineation  
Dated August 8, 2025  
Terracon Project Number: CJ257097

## **Project Overview**

The project area consists of ±10-acres located southwest of the Interstate 280 and State Road 92 intersection in Rock Island, Rock Island County, Illinois (depicted in red on Exhibit 1.0). The proposed project consists of the construction of a gas station, car wash, commercial retail store, dog park, walking trail, and associated parking lot and access drives. The development will include the use of downward facing lighting to reduce ambient lighting on abutting properties.

## **Species of Greatest Conservation Need Turtle Survey Report**

An intensive presence/inferred absence study focused on Species of Greatest Conservation Need (SGCN) turtles, specifically the Blanding's Turtle (*Emydoidea blandingii*) and Midland Smooth Softshell (*Apalone mutica mutica*), was conducted in

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response to recommendations from the Illinois Department of Natural Resources (IDNR) under EcoCAT Review #2512041.

### Study Area

The study encompassed the proposed ±10-acre project area and a 300-foot buffer zone (depicted by a dashed orange line on Exhibit 1.0), which included two aquatic features:

- Northern Pond: An ~39-acre man-made pond with steep banks and basking structures.
- Southern Slough: A mixed wetland complex embedded within the Milan Bottoms landscape.

### Survey Methodology

Three concurrent survey techniques for SGCN turtles were completed between May 27 and June 18, 2025:

1. Visual Encounter Surveys (VES) – Daily shoreline and aquatic habitat scans using high-powered optics and ultra-zoom cameras.
2. Nesting Surveys – Identification of suitable nesting substrates and searches for nesting turtles and depredated nests.
3. Trapping Surveys – Deployment of 10 baited hoop traps for 20 trap nights (4,800 trap hours) in suitable aquatic habitats within the 300 ft site buffer.

All surveys were conducted by qualified herpetologists under IDNR permits HSCP 25-16 and HSCP 25-19.

### Key Findings

No SGCN turtles were observed during any of the survey efforts.

- Visual Encounter Surveys recorded over 1,100 turtle observations, representing seven common species, but none were SGCN.
- Nesting Surveys identified 82 depredated nests and 35 actively nesting turtles (five common species), but no SGCN nesting activity.
- Trapping Surveys resulted in 175 turtle captures (five common species), with no SGCN individuals detected.

### Conclusions, Recommendations, and Current Status

The absence of SGCN turtles across all survey methods supports a probable absence determination for the Blanding's Turtle and Midland Smooth Softshell within the project area. As a result:

- The IDNR issued concurrence with survey findings and requested that personnel working on site during construction be issued educational materials

about the Blanding's Turtle. Additionally, IDNR recommended that if a stray Blanding's Turtle is encountered within the work area, crews should stop work immediately, allow the turtle to move out of the way and contact IDNR.

These findings should allow the project to proceed without additional regulatory constraints related to SGCN turtle species.

## **Eagle Nest Survey Report**

The purpose of performing the bald eagle (*Haliaeetus leucocephalus*) nest survey report was to review the study area for compliance and potential need for a disturbance permit in relation to the Bald and Golden Eagle (*Aquila chrysaetos*) Protection Act.

### **Study Area**

The nest survey study encompassed the proposed ±10-acre development site and a 660-foot buffer zone (depicted by a dashed yellow line on Exhibit 1.0). Additionally, a review for documented communal roost / foraging locations extended 1.0 mile from the proposed project area.

### **Survey Methodology**

A bald eagle nest survey was completed for the site and surrounding areas on May 6, 2025, by a trained Terracon biologist familiar with the United States Fish and Wildlife Service (USFWS) National Bald Eagle Management Guidelines. A visual survey was completed for the project area and 660-foot buffer via the use of binoculars and a spotting scope. The buffer area was accessed by means of existing roadways and rights-of-way.

### **Key Findings**

No nests were visually identified within 660 feet of the study area boundary during the May 2025 nest survey. Two eagles were observed on the southern adjoining wetland perched within a snag within the 660-foot buffer.

Milan Bottoms (Roost-BAEA-01123) was identified as a communal roost on the Center for Conservation Biology eagle roost records. The coordinates for the Milan Bottoms roost centroid is located ±0.62 miles west-northwest of the site.

### **Conclusions, Recommendations, and Current Status**

Terracon recommended the following:

- A follow-up nest survey should be conducted prior to construction to verify that no new nests have been constructed within 660 feet of the project site since the survey.
- Terracon recommended submitting the bald eagle nest survey report for consultation with USFWS to determine if seasonal construction restrictions or a

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disturbance permit would be required for the proposed development in association with the communal roost.

On August 22, 2025, Terracon received email correspondence from the USFWS Midwest Migratory Bird Office stating that a disturbance permit is not recommended for the project at this time. A follow-up nest survey was recommended before construction activities, and if a new nest was found within 660 feet of the project, a disturbance permit would be recommended.

## Aquatic Resources Delineation

The purpose of performing the aquatic resources delineation was to characterize the existing site conditions and document the presence of aquatic features with the potential to be regulated as waters of the United States (WOTUS) by the U.S. Army Corps of Engineers (USACE) under Section 404 of the Clean Water Act and Section 10 of the Rivers and Harbors Act. The delineation was also generally performed in accordance with IDNR state law (17 Ill. Admin. Code 3704).

### Study Area

The aquatic resources delineation was limited to the ±10-acre project area located southwest of the Interstate 280 and State Road 92 intersection in Rock Island, Rock Island County, Illinois (depicted by a solid red line on Exhibit 1.0).

### Survey Methodology

The delineation was generally performed in accordance with the 1987 USACE Manual and 2010 Midwest Regional Supplement 2.0. Terracon completed the field delineation of May 6, 2025, to collect data characterizing vegetation, soil, and hydrology across the study area. Eight data points and three representative photo points were collected during the field investigation. Data point and aquatic feature location data were collected utilizing a Bad Elf Flex Global Positioning System (GPS) unit capable of sub-meter accuracy.

### Key Findings

The table below summarizes the aquatic features delineated within the limits of the study area:

Summary of Delineated Aquatic Features					
Feature Name	Feature Type	Feature Max OHWM Width (Feet)	Feature Length (Feet)	Feature Area (Acres)	Likely Jurisdictional Status by USACE
E-1	Ephemeral Stream	4	26	<0.01	Non-Jurisdictional
FW-1	Forested Wetland	-	-	±0.05	Jurisdictional
SS-1	Scrub / Shrub Wetland	-	-	±0.07	Jurisdictional
OW-3	Open Water Wetland	-	-	±0.02	Jurisdictional

**Conclusions, Recommendations, and Current Status**

Terracon recommended coordination with the USACE Rock Island District to obtain an Approved Jurisdictional Determination (AJD) to verify Terracon’s findings and issuance of a No Permit Required (NPR) verification. The request is currently pending with USACE. Terracon and the USACE completed a site walk on September 19, 2025. USACE concurred with the location and limits of aquatic features delineated within the project area. Terracon will submit an exhibit depicting the maximum limits of disturbance relative to the delineated aquatic features prior to the USACE’s issuance of an AJD or NPR verification when the final design plan is issued without impacting aquatic features as discussed with the development team.

We appreciate the opportunity to be of service to you on this project. If there are questions regarding this report or if we may be of further assistance, please contact us at [Chrissy.bienz@terracon.com](mailto:Chrissy.bienz@terracon.com) or [bmruhe@terracon.com](mailto:bmruhe@terracon.com).

Sincerely,

**Terracon Consultants, Inc.**

  
 Christina Bienz  
 Senior Staff Scientist

  
 Aric A. Larson  
 Senior Scientist

  
 Brandon Ruhe  
 Senior Scientist

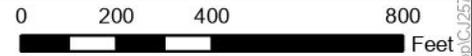
  
 Ben Berra  
 Principal  
 Department Manager

Attachment:  
 Exhibit 1



**Legend**

- Study Area
- 300 FT Survey Buffer for Turtle Surveys
- 660 FT Survey Buffer for Eagle Nests



DATA SOURCES:  
 ESRI WMS - World Aerial Imagery, OpenStreetMap

Proposal No.:	CJ257097
Date:	Oct 2025
Drawn By:	CRB
Reviewed By:	AAL



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Summary of Species Survey Areas
Bally West / Milan Bottoms Development Rock Island, Rock Island County, Illinois Center 90.6186°W 41.4604°N

Exhibit
<b>1.0</b>