



## OFFICE OF LOCAL DEFENSE COMMUNITY COOPERATION

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### National Environmental Policy Act Categorical Exclusion Adoption for the Forrestal Elementary School Reconfiguration Project, North Chicago School District 187-Naval Station Great Lakes, Illinois

Pursuant to the Council on Environmental Quality regulations (40 Code of Federal Regulations [CFR] Parts 1500–1508) implementing the National Environmental Policy Act (NEPA), the Department of Defense Office of Local Defense Community Cooperation (OLDCC) gives notice that it is adopting the Naval Station Great Lakes (NSGL) Record of Categorical Exclusion for “Forrestal Elementary School Renovations and Alterations” executed June 21, 2023 (Attachment 1). The prospective OLDCC Grantee, North Chicago School District 187 (N. Chicago SD187), proposes to reconfigure and renovate the existing Forrestal Elementary School. Construction will include demolishing existing structures, renovating existing building and adding building space. Associated utility and transportation systems will also be upgraded, including installation of geothermal heat pump systems. Construction will increase the footprint of the school from 66,822 square feet to 107,450 square feet. The proposed upgrades will increase the capacity of the school from 399 students to 580 students.

OLDCC is the grantor of federal funding for the proposed project under the Public Schools on Military Installations Program, which seeks to assist Local Education Agencies in constructing, renovating, repairing, or expanding elementary and secondary public schools on military installations in order to address capacity and facility condition deficiencies pursuant to Section 8108 of Public Law 117-328, “Consolidated Appropriations Act, 2023.” The prospective Grantee and NSGL prepared a Record of Categorical Exclusion (Attachment 1) for the renovation and alterations to Forrestal Elementary School. NSGL applied Categorical Exclusion 14 of 32 CFR § 775.6(f) for the proposed action. It provides for an exemption from further NEPA analysis for “alterations of and additions to existing buildings, facilities, and systems (e.g., structures, roads, runways, vessels, aircraft, or equipment) when the environmental effects will remain substantially the same and the use is consistent with applicable regulations.” Furthermore, NSGL determined that none of the extraordinary circumstances outlined in 32 CFR § 775.6(e) are applicable to this project. OLDCC agrees with this determination and finds the attached documentation appropriately evaluates the proposed action.

In accordance with the Council on Environmental Quality’s “National Environmental Policy Act Implementing Regulations” at 40 CFR §1506.3, OLDCC may adopt another agency’s determination that a Categorical Exclusion applies to a proposed action if the action covered by the original Categorical Exclusion determination and OLDCC’s proposed action are substantially the same. The action evaluated in the NSGL Record of Categorical Exclusion is the same proposed project that is the subject of the OLDCC award. Further, OLDCC agrees the Proposed Action will not have significant individual or cumulative environmental impacts, meets the criteria for the listed Categorical Exclusion, and that no extraordinary circumstances exist to preclude use of the Categorical Exclusion. Therefore, OLDCC adopts the NSGL Record of Categorical Exclusion determination for the subject project as supported by the analysis and

documentation provided in the following attached files, which are incorporated by reference herein:

- “Naval Station Great Lakes Record of Categorical Exclusion from Further Consideration Under the National Environmental Policy Act-Public Works Department Environmental Project Review-Forrestal Elementary School Renovations and Alterations” Navy Categorical Exclusion Determination signed by Andrew B. Hunt, Public Works Officer, Naval Station Great Lakes, on June 21, 2023 (Attachment 1- Forrestal Navy CATEX-NSGL).
- Supporting environmental documentation and consultation records; various formats, signatories, and production or signature dates (TAB A Attachment 2 – Forrestal CATEX Supplemental Environmental Docs).

The Categorical Exclusion determination and supporting materials in Attachments 1 and 2 demonstrate that the Proposed Action will have no significant environmental impacts and therefore does not require further assessment. The documentation constitutes a complete NEPA determination and shows that Navy Categorical Exclusion 14 of 32 CFR § 775.6(e) is applicable to the subject project.

OLDCC has independently reviewed the attached documentation and finds that implementation of the Proposed Action will not significantly impact the quality of the human environment. NSGL personnel have evaluated the action for conformity under the Clean Air Act, Section 176, and determined that the project will not exceed de minimis values. Emissions due to the proposed action would be construction-related and temporary. Typical construction noise is anticipated during the construction and will be temporary. Once constructed, the proposed action will not increase noise levels. Because the project is larger than one acre, it will require an updated National Pollution Discharge Elimination System general permit for stormwater. The prospective Grantee must acquire this permit prior to ground-disturbing activities. The proposed action will not take place within wetlands or a floodplain, and no bodies of water are present on the school’s property. NSGL will update its existing Stormwater Pollution Prevention Plan to account for the new footprint of the school. Significant effects to water resources and water quality are not anticipated. A visual site inspection performed in 2022 (Included in Attachment 2) did not detect any threatened or endangered species at the project site. As the site is already developed, no suitable habitat for threatened or endangered species is present. Open areas with the school’s property are grassy, so clear cutting of trees is not necessary to construct the additions. Overall, due to the nature of the project site, significant effects to natural resources are not anticipated.

An 8,000-gallon diesel underground storage tank and a drywell are located within the school’s property and will be removed as part of this action. The prospective Grantee has committed to adhering to all regulations and Best Management Practices associated with their disposal and handling of hazardous material. Following demolition, soil sampling will be conducted to determine if any spills of hazardous materials occurred during removal. If a release is confirmed, the prospective Grantee will complete the appropriate notifications and report in accordance with local and federal laws and regulations. Surveys outlining the characteristics of

these structures can be found in Attachment 2. If regulated building and/or other environmentally hazardous or regulated materials are encountered, the NSGL Public Works Environmental Division will be immediately notified, and such hazards will be abated and disposed of in accordance with federal, state, local and Navy regulations.

NSGL consulted with the Illinois State Historic Preservation Office (SHPO), requesting a review of the project pursuant to requirements under Section 106 of the National Historic Preservation Act. They submitted a description of the project, a cultural resources survey, and materials delineating the Area of Potential Effect. The SHPO responded on January 3, 2024, stating that no historic properties are present at the project location and no historic properties would be impacted by the action. Following a change in scope of the project, SHPO was reconsulted to receive an updated determination on June 10, 2024. SHPO responded on July 3, 2024, and indicated that the change in scope did not affect their initial determination. Record of consultation with the SHPO can be found in Attachment 2. If human remains, funerary objects, cultural items, or archaeological materials are encountered during project construction and related work, activity in the area must cease immediately and appropriate SHPO, OLDCC, and NSGL personnel must be contacted for additional guidance.

The action for which the prospective Grantee and NSGL prepared and executed the attached Categorical Exclusion determination (Attachment 1) is the same action as OLDCC's Proposed Action and applying the Navy Categorical Exclusion 14 of 32 CFR Part 775.6(e) is an appropriate NEPA determination for this project. Therefore, OLDCC adopts the Categorical Exclusion determination per 40 CFR § 1506.3. Further, OLDCC, as the adopting agency, confirms that none of the circumstances listed in 40 CFR § 1506.3(e) are present.

I have determined that the information provided above and in the attached documents provides sufficient evidence and analysis for determining that an Environmental Assessment or Environmental Impact Statement is not required.

Sincerely,

Patrick J. O'Brien  
Director

Attachments:  
As stated