

**MEMORANDUM OF AGREEMENT AMONG
JOHN FEDER TRUCKING,
THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, AND
THE ILLINOIS STATE HISTORIC PRESERVATION OFFICE
REGARDING PARKING LOT CONSTRUCTION
IN MADISON COUNTY, ILLINOIS
(SHPO LOG #003111124)**

WHEREAS, John Feder Trucking (JFT) has proposed to develop a parking lot for semi-trucks and trailers (the Project) on [REDACTED] in Section [REDACTED] of Township [REDACTED], Range [REDACTED] in [REDACTED], Madison County, Illinois; and

WHEREAS, the Project will require permits for construction from the Illinois Environmental Protection Agency (IEPA), thereby making the Project an Undertaking subject to review under the Illinois State Agency Historic Resources Preservation Act (20 ILCS 3420) and its implementing rules (17 IAC 4180) (Act); and

WHEREAS, JFT has consulted with the Illinois State Historic Preservation Office (Office), a Division of the Illinois Department of Natural Resources (IDNR), pursuant to the Act; and

WHEREAS, the Office currently resides within IDNR, and the Director of IDNR is the duly designated State Historic Preservation Officer (SHPO); and

WHEREAS, archaeological site 11MS1045 (Site) is located within the area of potential effect for the Undertaking; and

WHEREAS, on July 3, 2025, the SHPO determined that the Site is eligible for inclusion in the National Register of Historic Places; and

WHEREAS, on July 3, 2025, the SHPO found that the Undertaking will have an adverse effect on the Site; and

NOW, THEREFORE, JFT, IEPA, and the SHPO agree that the Undertaking shall be implemented in accordance with the following stipulations in this Memorandum of Agreement (Agreement) in order to mitigate the adverse effects of this Undertaking to the Site as a result of this Project.

STIPULATIONS

I. MITIGATION

- A. JFT has retained Environmental Research Center, LLC (the Contractor), who meets the Secretary of the Interior's Qualifications (36 CFR 61), to complete the mitigation measures described below.
- B. The Contractor will conduct Phase III archaeological data recovery excavations (the Mitigation) at the Site, as required by the Illinois State Historic Preservation Office Guidelines for Archaeological Reconnaissance Surveys/Reports, as revised.

- C. The Mitigation shall be guided by the research questions and data recovery plan that are included in Appendix A. The Contractor must consult with the SHPO prior to the initiation of the work to ensure that expectations are understood.
- D. Upon completion of the fieldwork portion of the Mitigation, the Contractor must submit in writing to the SHPO a Letter Report of Findings. The SHPO must respond to the Letter Report of Findings within five business days. Once the SHPO accepts in writing the Letter Report, construction may commence.
- E. The Contractor shall submit 95% draft report of investigations in writing to the SHPO for review and comment.
- F. When the SHPO accepts in writing the 95% report, JFT and the Contractor will complete the final report of investigations.
- G. The final report of investigation must be submitted to the SHPO within one (1) year after completion of the fieldwork portion of the Mitigation.
- H. Concurrent with the submission of the final report of investigations to the SHPO, and with JFT's permission, the Contractor will submit all archaeological materials recovered during excavations, as well as field notes and other documentary records, to the Illinois State Museum (ISM). The Contractor must consult with the ISM to identify and resolve curation procedures for the accession of these materials. If the ISM declines accession, the Contractor must consult with the SHPO.

II. DURATION

This Agreement shall be effective until such time as all its terms are satisfied, or it is amended or terminated and replaced. Prior to such time, the signatories may consult to reconsider the terms of the agreement and amend it in accordance with Stipulation V AMENDMENTS below.

III. POST-REVIEW DISCOVERIES

If potential historic properties are discovered or unanticipated effects on historic properties found, parties shall consult with the SHPO immediately and make reasonable efforts to avoid, minimize, or mitigate adverse effects to such properties. In the event of an unanticipated discovery of human remains or burials, JFT understands and agrees that it must immediately stop work within the area of discovery, consult with the SHPO, and comply with the Human Remains Protection Act (20 ILCS 3440) as administered by IDNR, which provides that no human skeletal remains shall be disturbed without a permit issued by IDNR.

IV. MONITORING AND REPORTING

Each year following the execution of this Agreement and until the field work is completed, the Agreement expires or is terminated, parties shall provide all parties to this Agreement a summary report detailing work undertaken pursuant to its terms. Such report shall include any scheduling changes proposed, any problems encountered, and any disputes or objections received in JTF's efforts to carry out the terms of this agreement.

V. DISPUTE RESOLUTION

Should any signatory to this agreement object at any time to any actions proposed or the manner in which the terms of this agreement are implemented, JFT shall consult with the signatories to resolve the objection. If the signatories cannot agree regarding on a resolution to the dispute, procedures provided in 20 ILCS 3420/4e shall be utilized to attempt to resolve the impasse.

VI. AMENDMENTS

This agreement may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date a copy is signed by all of the signatories.

VII. TERMINATION

If any signatory to this agreement determines that its terms become impossible to carry out, that party shall immediately consult with the other parties to attempt to develop an amendment per Stipulations V and VI above. If within thirty (30) days an amendment cannot be reached, any signatory may terminate the agreement upon written notification to the other signatories.

VIII. FACSIMILE OR .PDF SIGNATURES

This Agreement may be executed in counterparts, each of which shall be considered an original and together shall be one and the same Agreement. A facsimile or .pdf copy of this Agreement and any signatures thereon will be considered for all purposes as an original.

EXECUTION of this Agreement and implementation of its terms evidence that JFT and IEPA have afforded the SHPO an opportunity to comment on the effects of the Undertaking in compliance with the Act.

[Signature Pages to follow]

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JOHN FEDER TRUCKING,
THE ILLINOIS ENVIRONMENTAL PROTECTION AGENCY, AND
THE ILLINOIS STATE HISTORIC PRESERVATION OFFICE
REGARDING PARKING LOT CONSTRUCTION
IN MADISON COUNTY, ILLINOIS
(SHPO LOG #003111124)

SIGNATORY

JOHN FEDER TRUCKING

Signature: John Feder Date: 4/29/26
Name: John Feder
Title: owner

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REGARDING PARKING LOT CONSTRUCTION
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(SHPO LOG #003111124)**

SIGNATORY

ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

Signature: _____ Date: _____

Name: _____

Title: _____

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IN MADISON COUNTY, ILLINOIS
(SHPO LOG #003111124)**

SIGNATORY

ILLINOIS DEPUTY STATE HISTORIC PRESERVATION OFFICER (SHPO)

Signature: Carey L. Mayer Date: 2/19/2026
Carey L. Mayer, AIA
Deputy State Historic Preservation Officer
Illinois Department of Natural Resources

CULTURAL RESOURCE INVESTIGATIONS

DATA RECOVERY PLAN

11MS1045
Madison County, Illinois

Prepared for:
John Feder Trucking

Prepared By:
Environmental Research Center, LLC
5677 Pernod Ave.
St. Louis, MO 63139

Phone: 314-646-0119

Email: clark.sturdevant@gmail.com

Principal Investigator:
Clark Sturdevant

January 26, 2026



DATA RECOVERY PLAN

11MS1045

By Clark Sturdevant

Introduction

Site 11MS1045 is a Mississippian habitation situated in the American Bottom floodplain in Madison County, Illinois (Figure 1). The site was located during a Phase I conducted by USACE in 1981 by the Illinois State Museum Society Archaeological Research Program (ISM) (Dwyer et al. 1981) and revisited by Environmental Research Center, LLC (ERC) during an additional Phase I cultural resource investigation conducted in 2025 (Sturdevant 2025). The revisit investigations revealed intact subsurface cultural deposits (Sturdevant 2025) and the Illinois Historic Preservation Agency (IHPA) determined the site to be eligible for NRHP listing under Criterion D recommending a Phase III or avoidance in a letter dated July 3, 2025.

Development of this tract will require an Illinois EPA permit application. Private undertakings that involve state permits require cultural resource investigations by the authority of the Illinois State Agency Historic Resources Preservation Act (20 ILCS 3420, as amended, 17 IAC 4180).

Before deciding to mitigate these sites, the property owners considered alternatives that would avoid affecting them, but none proved to be prudent, feasible, or less likely to avoid adverse effects to other resources. Therefore, impacts to these sites by the proposed development cannot be avoided.

This Phase III data recovery plan has been designed to mitigate the adverse effects of construction activity through prior data recovery. This plan will also be used for data recovery if unanticipated or undetected portions of the sites are discovered during mitigation or project implementation. This plan takes into account data recovery requirements outlined in the Secretary of the Interior's *Standards and Guidelines for Archaeological Documentation* (48 FR 44734-37) and in the Advisory Council on Historic Preservation's publication *Treatment of Archaeological Properties*.

Research Design

Summary of Previous Investigations

The multi-component site 11MS1045 was identified in 1981 by a crew from ISM and USACE during a Phase I survey conducted by USACE (Dwyer et al. 1981). The site and findings were described thus:

This site is located just [REDACTED] approximately [REDACTED] west of its intersection with [REDACTED]. The setting is a cultivated field on a relatively flat northeastward sloping, northwest southeast ridge at 129.5 m above MSL. [REDACTED] about [REDACTED] km to the northwest, is the nearest permanent source of water. The 1,650 sq m scatter of artifacts on the dark brown sand and silt surface

included the following cultural materials: 1 uniface, 1 biface, 4 utilized flakes, 1 core remnant, 2 untyped tools, 14 pieces of flaked stone debitage, 1 historic and 6 prehistoric pottery fragments.

Of the six prehistoric pot sherds recovered, two are stylistically associated with the Mississippian cultural period and four with the Late Woodland. The most distinctive sherd has been identified as a rim fragment of a Monks Mound Red Mississippian seed jar. One historic ceramic sherd was recovered during reconnaissance survey and is considered an isolated find (Dwyer et al. 1981).

ERC conducted additional Phase I investigations at 11MS1045 in March of 2025 (Sturdevant 2025). Pedestrian survey and five 2 meter by 12-15 meter were used to investigate the project area. The pedestrian survey observed three chert flakes, and the trenching revealed two sherds (one grit and grog tempered, one shell tempered) and two subsurface, prehistoric features (one post mold [Feature 1] and the base of a feature of unknown type [Feature 2]) (Sturdevant 2025). Charcoal, carbonized seeds and nutshell, possibly walnut, and fine, heat-treated chert waste were recovered from flotation samples taken from the feature fill of Feature 2.

Research Potential

Site 11MS1045 has the potential to address questions about Mississippian and Late Woodland site typology and function in the American Bottom. Any data recovered from 11MS1045 may add valuable context not only to the region in general, but to the nature of the prehistoric activities in the direct vicinity. Data recovery investigations will therefore contribute baseline information about Mississippian and Late Woodland land use in the American Bottoms as well as add context to activities in the general vicinity.

Methodology

Field Investigations

Existing topographic mapping will be used for each site. Additional mechanical excavations will be performed at the site to provide adequate blank (feature-free) space around previously discovered features, and to provide adequate coverage of areas that were not exposed during previous investigations. Stripping will begin near exposed feature locations and will proceed outwards towards the site boundaries, continuing until it appears that no more features remain to be discovered.

Feature excavation will follow commonly used methods for the American Bottom region. First, a detailed plan of each exposed feature will be drawn at a 1:20 scale. Each feature will then be photographed, including a north arrow, scale, and photo board. All observations for each feature will be recorded on forms.

Structures will be sectioned along its short axis, and the basin fill of the first half will be shovel scraped but not screened. A profile of the short axis will be drawn. The second half will then be removed by fill zone. During the removal of both halves, the specific locations of artifacts

or staining in primary context will be recorded. The bottom of the structure basin will be hand scraped to identify pits, post molds, wall trenches, or other interior features. Wall trenches and post molds will be assigned wall trench and post mold numbers and will be sectioned and drawn. Fill within these features will be excavated.

Pits and posts will be bisected along the north-south axis if circular, or along the long axis if oval, rectilinear, or irregular. One-half of the feature will be removed using shovels, trowels and other equipment as appropriate. Soils will be screened when possible and artifacts collected as the feature is excavated. Once the feature bottom is reached, the profile wall and pit floor will be cleaned, and sterile soils surrounding the feature will be removed as appropriate to permit profile mapping and photography.

The second half of the feature will then be excavated. This half will be removed, screened, and cataloged according to fill zone. Appropriate analytical samples (e.g., flotation, radiocarbon) will usually be taken from each fill zone of the second half of the feature. Flotation samples will be 10 liters in volume, unless not enough fill is present to equal this amount.

During previous archaeological investigations, there was no evidence indicating that human burials were present or are highly likely to be present. If burials are discovered during Phase III investigations, required notifications of the discovery will be made to the county coroner and to the State Historic Preservation Office (SHPO). If the burial is not a crime scene, as determined by the coroner, then it and any associated burial artifacts will be removed following procedures for recordation and reporting that follow the Human Skeletal Remains Protection Act (20 ILCS 3440, 17 IAC 4170). Disposition of human remains and burial artifacts will be determined by the SHPO under the provisions of the Act.

Laboratory Analysis

Cultural materials recovered during these investigations will be washed, sorted, and inventoried by material categories (i.e., ceramics, lithics, faunal remains, floral remains), and rebagged in reclosable polyethylene bags containing Mylar or acid-free paper tags. The flotation samples will be processed using standard methods, such as those outlined by Wagner (1976).

The specific goals of artifact analysis will depend upon several factors, such as context, quantity of debris, and new research questions that may surface during the course of field investigations or laboratory analysis. Regardless of the particular emphasis in the analysis of each artifact class, standard methods for identification and data collection commonly used for Late Woodland sites in the American Bottom area will be employed. The data derived from analysis will be structured so that they will be directly comparable to those from other excavated sites, with a particular emphasis on comparability with analyzed American Bottom Mississippian sites. Specialized analyses of faunal, floral, and human remains, as well as radiocarbon determinations, will be performed if enough materials are recovered to produce significant information. Selected artifacts relevant to the analysis will be illustrated in photographs and/or line drawings. Plan maps, feature profiles, and other field observations will be illustrated as appropriate.

Reporting

The final report on data recovery at both sites will be provided in a format acceptable to SHPO, the National Park Service, and the National Technical Information Service. The report will take into account the Department of the Interior's *Format Standards for Final Reports of Data Recovery Programs* (42 FR 5377-79).

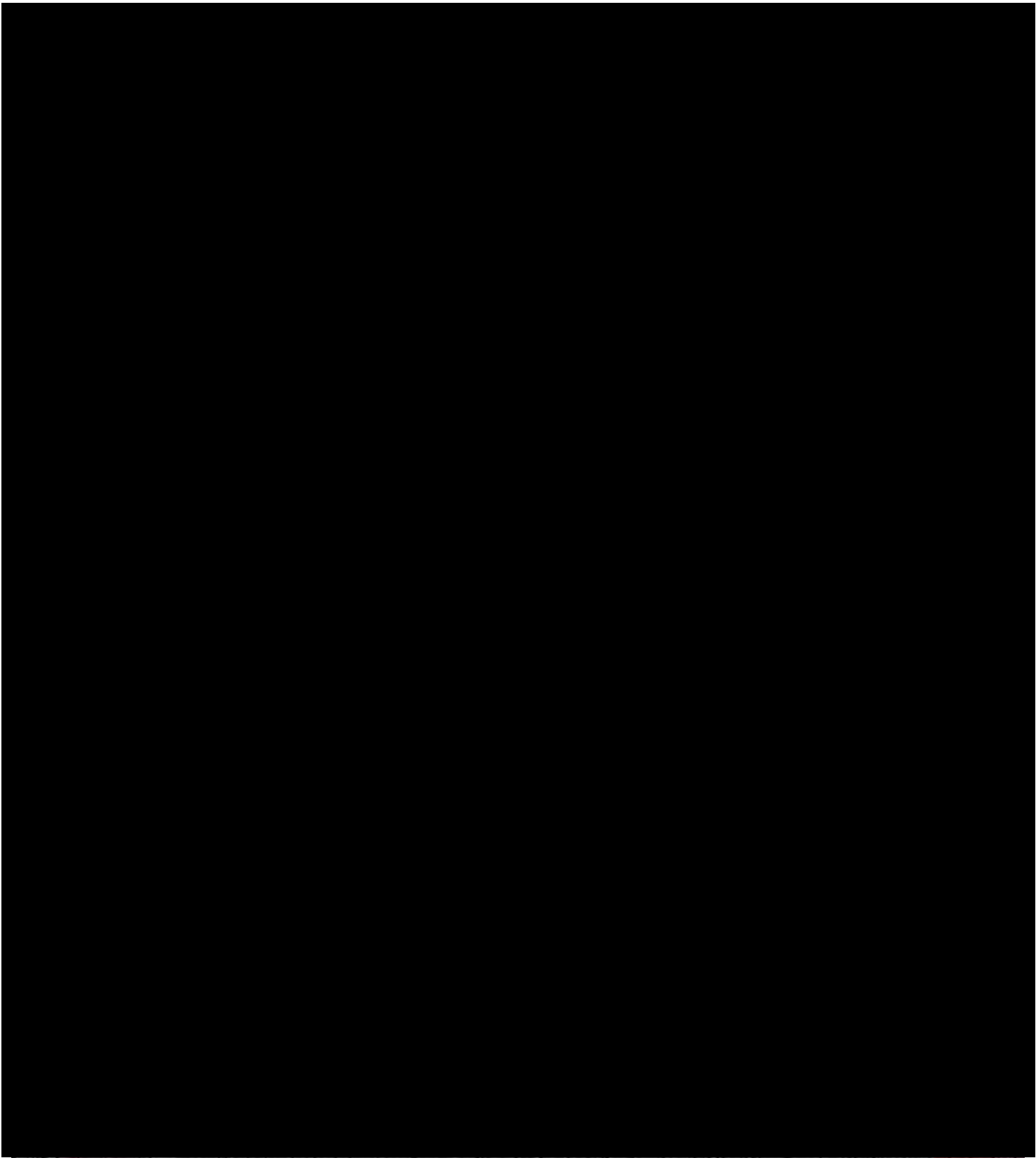
The report will summarize the results of data recovery investigations at both sites with specific reference to the research topics defined above. It will describe the study area, present relevant background research, and include a discussion of the research design and methods, and any necessary deviations from this plan. The field studies will be described, including all relevant field observations. The results of analysis will include both raw data and digested data such as tables and graphs. The report will evaluate the investigation in terms of its objectives as stated in the data recovery plan and will include appropriate recommendations for future research on recovered data. It will also include this data recovery plan as an appendix.

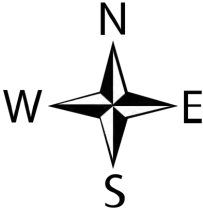
Curation of Materials and Records

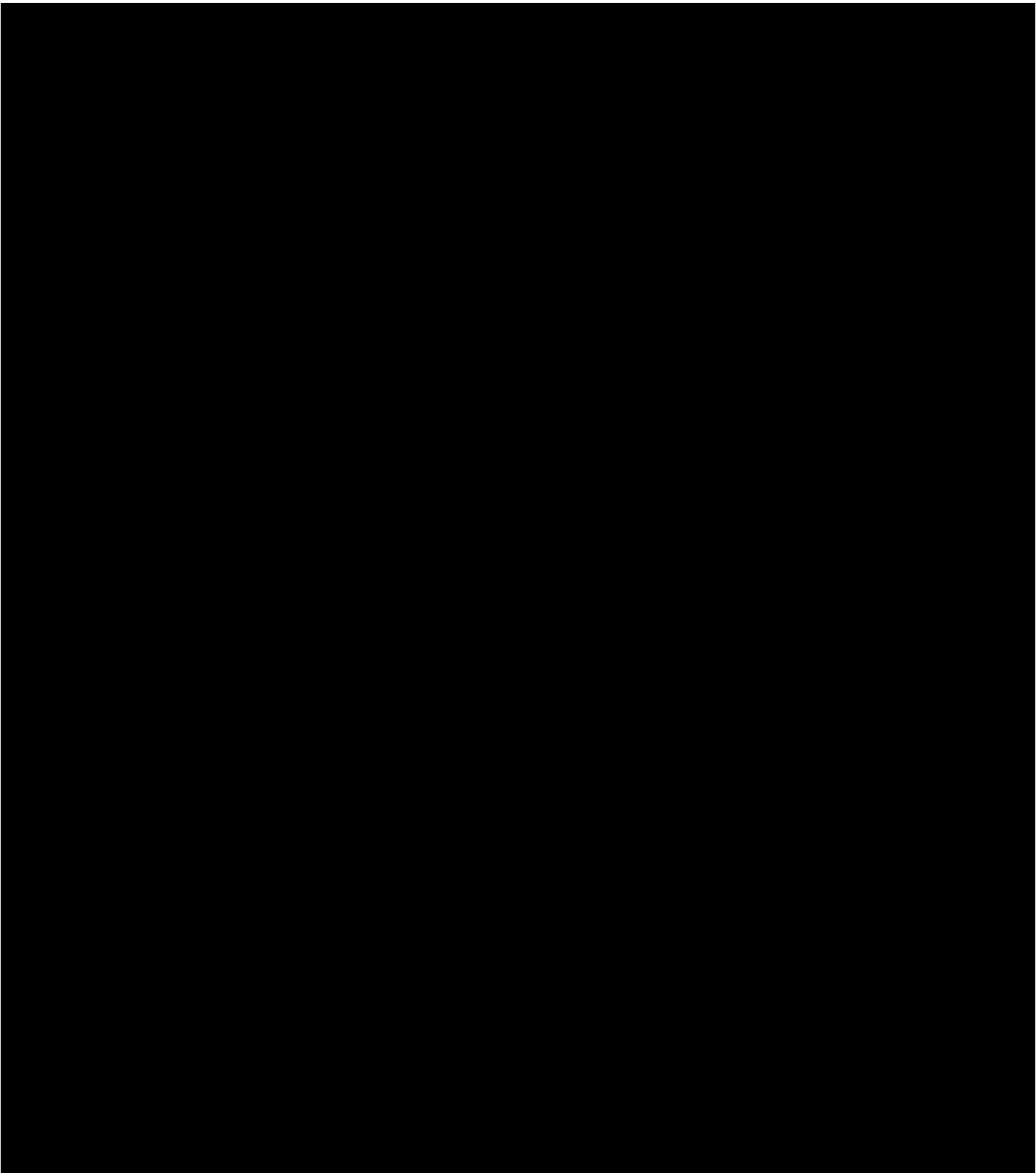
All archaeological materials and records resulting from mitigation of 11MS1045 will be curated at the Illinois State Museum Research and Collections Center or at an alternate facility if authorized by the SHPO. Collections will be prepared following the *Instructions for Boxing and Inventorying Archaeological Collections that will be Curated at the Illinois State Museum*. The disposition of any recovered human remains will be determined by SHPO.

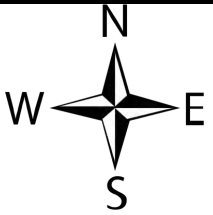
References Cited

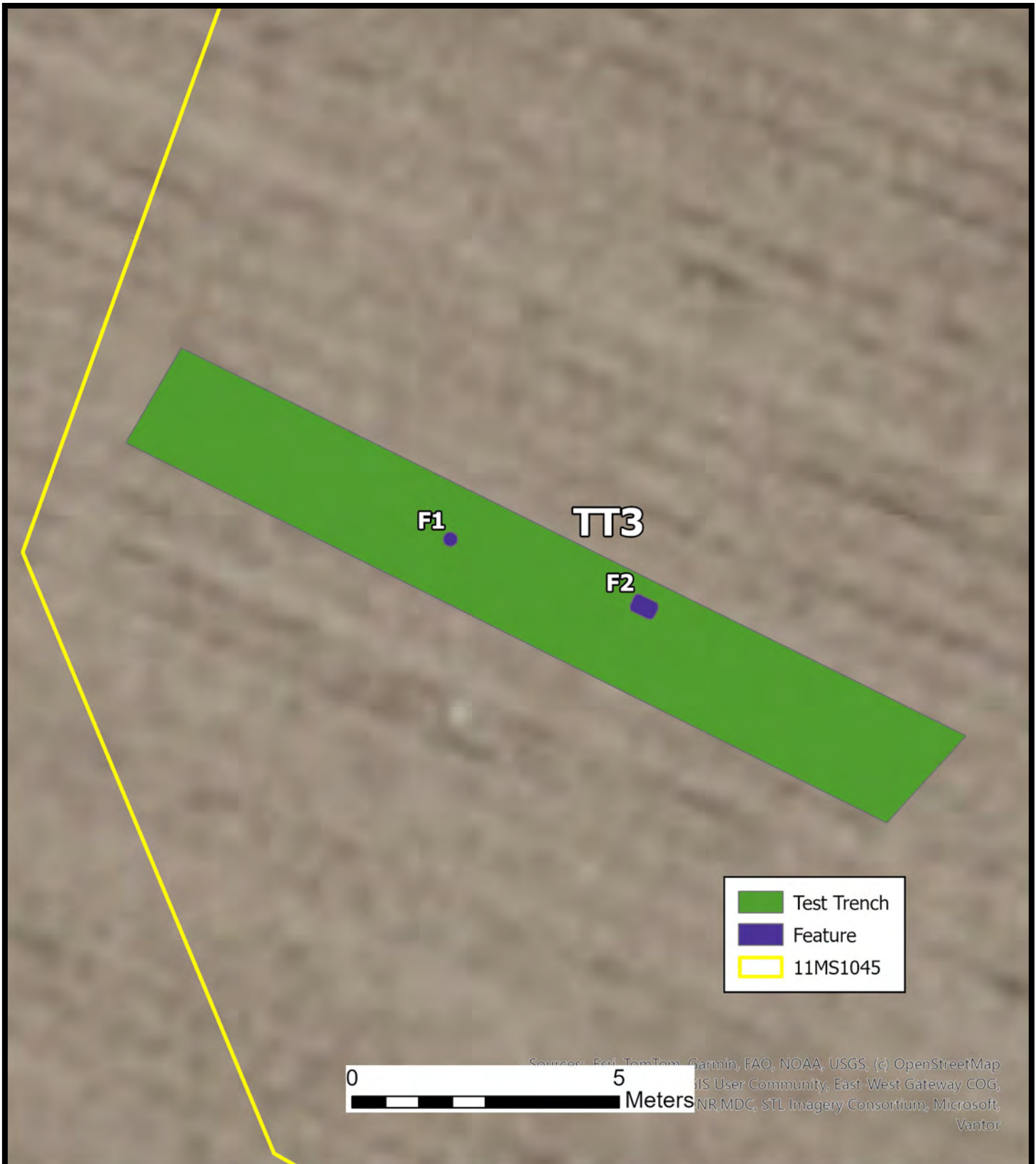
- Dwyer, J.P., J. Jacobson, J. Moore, K. R. Moore, and J.M. Peterson
1981 *A Cultural Resource Survey of the Proposed St. Louis Harbor Site Locations, Madison County, Illinois*. Illinois State Museum Society Archaeological Research Program. Springfield, Illinois [SHPO Doc. 674]
- Sturdevant, C.
2025 Cultural Resource Investigations Phase I Archaeological Survey for John Feder Trucking Granite City, Madison County, Illinois. IEPA [SHPO ID: 26079]
- Wagner, Gail E.
1976 IDOT Flotation Procedure Manual. Ms. on file, Illinois Department of Transportation, District 8, Fairview Heights.

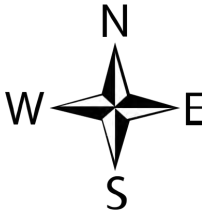


	Project Name: 11MS1045	Notes: 1998 Granite City 7.5' USGS Quadrangle (topographic). Reston, Virginia.	
	Site Location		
	Date: January 2026		Figure: 1



	Project Name: 11MS1045	Notes: Source: ArcGIS World Imagery	
	Aerial Map		
	Date: January 2026		
			Figure: 2



	Project Name: 11MS1045	Notes: Source: ArcGIS World Imagery	
	Aerial Map		
	Date: January 2026		Figure: 3



Project Name:
11MS1045

Feature 1

Date:
January 2026

Notes:

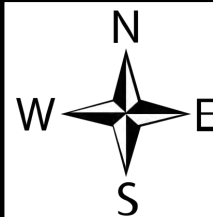


Figure: 4



Project Name:
11MS1045

Feature 2

Date:
January 2026

Notes:

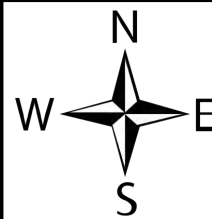


Figure: 5