



DEPARTMENT OF THE ARMY
OFFICE OF THE ASSISTANT SECRETARY OF THE ARMY
IN INSTALLATIONS, ENERGY AND ENVIRONMENT
110 ARMY PENTAGON
WASHINGTON DC 20310-0110

9/10/2026

Director Natalie Phelps Finnie
Illinois Department of Natural Resources
One Natural Resources Way
Springfield, IL 62702

Via email to carey.mayer@illinois.gov

Dear Ms. Finnie,

This letter serves as the Department of the Army's (Army) final notification of termination for the National Historic Preservation Act Section 106 *Programmatic Agreement Among the United States Army, Illinois State Historic Preservation Officer, and Advisory Council on Historic Preservation for the Closure and Disposal of Savanna Army Depot Activity, Illinois* (PA), to which your office is a signatory.

As you are aware, this action is necessary to facilitate the Army-wide implementation of the Advisory Council on Historic Preservation's (ACHP) *Program Comment for Army Warfighting Readiness and Associated Infrastructure* (91 FR 24249) (Program Comment), which establishes a new Section 106 compliance framework for the Army.

The administrative record shows the following sequence of events: On June 16, 2026, the Army initiated consultation with the Advisory Council on Historic Preservation (ACHP) and the Illinois State Historic Preservation Officer (IL SHPO) to amend the Programmatic Agreement (PA) for the Savanna Army Depot to incorporate the new Program Comment. In a response dated July 14, 2026, the ACHP stated its concerns with the proposed amendment, noting it was inconsistent with the existing Agreement's processes, and recommended that the Army instead pursue an amendment to sunset or expire the Agreement. The Army also met with the IL SHPO on July 15, 2026 to discuss the applicability of the Program Comment but the IL SHPO did not provide formal follow-on comments within the 30-day review and comment period. Acknowledging that amending the PA as originally proposed was no longer viable because the ACHP would not sign and the IL SHPO did not respond, the Army, in letters dated July 30, 2026, formally notified both the IL SHPO and the ACHP of its proposal to terminate the PA. On August 5th, 2026, the ACHP responded and concurred with the applicability of the Program Comment to Savanna Army Depot and affirmed that termination under Stipulation X is an allowable path. This action initiated a 30-day consultation period to develop an alternative amendment, concluding on August 29, 2026, without yielding an alternative to termination.

Consequently, pursuant to Stipulation X of the PA, the Army hereby formally and finally terminates the PA, effective immediately upon your receipt of this letter. Henceforth, the Army will fulfill its Section 106 compliance responsibilities at Savanna Army Depot by adhering to the framework set forth in the above-referenced Program Comment. The Army is also providing final notification of PA termination to the ACHP by separate correspondence.

Thank you for your continued support of our Soldiers and their families.

Sincerely,

David Guldenzopf, Ph.D.
Department of the Army Federal Preservation Officer