

FEDERAL HIGHWAY ADMINISTRATION
FINDING OF NO SIGNIFICANT IMPACT

FOR

U.S. ROUTE 54, PIKE COUNTY, MISSOURI AND PIKE COUNTY, ILLINOIS

MISSISSIPPI RIVER BRIDGE PROJECT

JOB NUMBERS:
MISSOURI J3P2209
ILLINOIS D-96-165-10

FEDERAL AID NO. 0544049

The Federal Highway Administration (FHWA) has determined this project will not have any significant impact on the human environment. This finding of no significant impact is based on the attached environmental assessment, which has been independently evaluated by the FHWA and determined to adequately and accurately discuss the environmental issues and impacts of the proposed project. It provides sufficient evidence and analysis for determining that an environmental impact statement is not required. The FHWA takes full responsibility for the accuracy, scope, and content of the attached environmental assessment.

10/20/16
Date


Responsible Official

Program Development Team
Leader
Title

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FINDING OF NO SIGNIFICANT IMPACT

23 CFR 771.121

Missouri Department of Transportation

Illinois Department of Transportation

Federal Highway Administration

REGIONS	STATE PROJECT NOS.	PROJECT TITLE/ENVIRONMENTAL DOCUMENT TYPE
Missouri Division Illinois Division	J3P2209 D-96-165-10	U.S. Route 54, Louisiana, Missouri and Pike County, Illinois Mississippi River Bridge Environmental Assessment

INCLUDES PROGRAMMATIC SECTION 4(f) and
MEMORANDUM OF AGREEMENT FOR MITIGATION OF ADVERSE EFFECTS TO HISTORIC PROPERTIES
and SECTION 4(F) *DE MINIMIS* IMPACT DETERMINATION

DECISION

The Federal Highway Administration (FHWA), Missouri Division, approved the U.S. Route 54 (Route 54) Mississippi River Bridge Environmental Assessment (EA) on April 21, 2016, for Missouri Department of Transportation (MoDOT) Job Number J3P2209 and Illinois Department of Transportation (IDOT) Job Number D-96-165-10. Notice of the EA's availability was sent to agencies and the document was made available for public review at Louisiana, Missouri, City Hall; the Pike County Missouri Courthouse in Bowling Green, Missouri; the Pike County Courthouse in Pittsfield, Illinois; the MoDOT District Office, 1711 S. Highway 61, Hannibal, Missouri; the IDOT District 6 Office, 126 East Ash Street, Springfield, Illinois; and electronically at <http://www.champclarkbridge.com/champclark/index.php/environmental-assesment>.

The Selected Alternative to solve the transportation problems associated with the Route 54 Bridge is the adjacent downstream alternative, which was identified as the preferred alternative in the EA. It will replace the existing bridge with a new two-lane bridge approximately 50 feet south of the existing bridge. The new bridge will likely terminate west of the Sny Levee in Pike County, Illinois. This alternative will realign a portion of Route 54 approximately 65 feet south of the existing alignment and terminate before Wehrman Street in Louisiana, Missouri. The eastern terminus of the project is Township Road 400 in Illinois. The Selected Alternative will result in the removal of the existing historic bridge after the new structure is built.

The Selected Alternative was identified through public and agency involvement along with assessment of socioeconomic and environmental consequences. The public hearing was held in accordance with established MoDOT and IDOT procedures. MoDOT and IDOT have considered possible social, economic, and environmental effects of the proposed improvements.

PUBLIC AND AGENCY REVIEW/COMMENT ON EA

An open house public hearing was held Thursday, June 9, 2016, at Twin Pike YMCA in Louisiana, Missouri, from 4:30 p.m. to 6:30 p.m. with a formal presentation conducted at 5:30 p.m. Eighty-three people attended the hearing. The purpose of the public hearing was to provide the opportunity to offer comments and concerns regarding the Selected Alternative. Comment forms were available for attendees to provide written feedback. Voice recorders were available for attendees to record oral statements about the project. Comments also were received online. The Environmental Assessment document, public hearing displays, and opportunity to comment on the project were available on-line at www.champclarkbridge.com. Public comments on the EA were accepted until 6:30 p.m. on June 23, 2016. Public and local stakeholders submitted nineteen written comments, five comment forms and one letter (Sny Island Levee Drainage District) during the public hearing. One comment form and two letters

(Pike County Farm Bureau and Village of Pleasant Hill, Illinois) were received by mail, one comment form was received by email, and nine comments were submitted through the www.champclarkbridge.com website.

MoDOT discovered that Illinois agencies had inadvertently not been provided the Notice of Availability (NOA) of the environmental assessment. On July 1, 2016, MoDOT re-opened the 30-day comment period to Illinois agencies with comments accepted until August 1, 2016.

Missouri Department of Natural Resources (MDNR) indicated it could not find its record of receiving the NOA. On July 13, 2016, MoDOT agreed to accept comments from MDNR until August 5, 2016.

The NOAs for Missouri and Illinois and the agencies that received copies of the NOA are contained in Appendix A of this FONSI.

Comments received via the public hearing, social media, and during the initial 30-day comment period, second 30-day comment period, and during MDNR's extended comment period are discussed below.

PUBLIC HEARING COMMENTS

- **Bicycle/Pedestrian Facilities:** Eight comments expressed support for including bicycle/pedestrian accessibility on the new bridge. One commenter would like to see the existing bridge rehabilitated to be used as a pedestrian and bike crossing.

Response: The existing 20-foot-wide bridge discourages bicycles and all but prohibits pedestrians from crossing the river. Bicyclists predominantly travel Missouri Route 79 or Illinois Route 96 making use of the paved shoulders, but rarely cross the bridge. Given the small population and lack of bicycle/pedestrian-only trails near the bridge; this location would struggle to consistently produce enough bicycle/pedestrian users to justify a separated facility on the bridge.

The City of Louisiana currently does not have plans to construct any bicycle/pedestrian facilities within the city and does not have a master bicycle and pedestrian plan in place to guide future construction of bicycle/pedestrian facilities within the community. The new bridge will include a variety of design features to make it bicycle friendly, including wide shoulders capable of allowing bicycles to safely cross the river, cover plates on the joints and bicycle safe grates on drainage structures to prevent bicycle tires from getting wedged. While less desirable than a protected pedestrian facility, the wide shoulders will allow pedestrians access across the river, a movement that is now virtually prohibited.

Retaining the existing bridge to function as a dedicated bicycle/pedestrian river crossing was not considered because of the deteriorating condition of the bridge. The age and condition of the existing bridge creates an on-going need for costly maintenance and scheduled repairs, which often restrict the use and capacity of the bridge. The bridge is considered to be at the end of its useful life and would require considerable repairs and maintenance costs to keep it in place. As part of the Section 106 process MoDOT has made the Champ Clark Bridge available for adaptive reuse, to any person, government or group willing to assume financial responsibility for the structure, which could involve maintaining it for bicycle/pedestrian use. An advertisement for bridge assumption remains open until December 31, 2016. If a group or an individual can develop a viable reuse plan it will be considered by FHWA, MoDOT, IDOT, and Missouri State Historic Preservation Officer, and the Illinois State Historic Preservation Officer.

- **Mississippi River Flooding/Illinois bridge approach:** Five comments expressed concern about the design of the Illinois roadway approach and its impact on upstream flooding.

Response: As part of the EA, IDOT and MoDOT committed to constructing the Illinois approach roadway to a 500-year flood event at 466.1 feet mean sea level (msl); ensuring the roadway will not close because of flooding unless the Sny Levee is breached. MoDOT is required by law to certify that the new bridge project does not raise the water elevation for the 100-year flood over the

existing conditions. Any opportunity to improve the transfer of flood water will be evaluated in conjunction with the cost to provide additional flow.

- Historic Homes Along Route 54: One commenter was concerned that the project should not harm historic homes along Route 54 in Louisiana.

Response: MoDOT in conjunction with the Missouri SHPO conducted an architectural survey to determine if any eligible resources or historic districts would be impacted by the project. In Missouri, two parcels are listed on the National Register of Historic Places (NRHP) as part of the North Third Street Historic District. In addition, six parcels within the project limits were recommended as individually eligible for listing on the NRHP and four parcels are recommended as eligible as part of the Wehrman/Frankford Historic District. The preferred alternative will have no adverse effect on the six individually eligible parcels. The preferred alternative was found to have no impact on the four parcels eligible for listing on the NRHP or within the Wehrman/Frankford Historic District. The preferred alternative was found to have an indirect visual effect on two parcels eligible for listing on NRHP and the North Third Street Historic District by removal of buildings between Route 54 and the resources; however, these resources would not be adversely affected, since significant views to and from the property are not associated with the significance of the property.

- Vehicle Speed on Route 54: One commenter was concerned that traffic should be slowed along Route 54 in Louisiana to make it safer.

Response: The speed limit on Route 54 across the bridge and into Louisiana is currently 30 miles per hour (MPH). MoDOT understands that the new bridge will be wider, which could lead to faster speeds entering Missouri from Illinois. Because the intersection of Route 54 and Route 79 south will still require vehicles to stop to allow Route 79 drivers to turn onto Route 54, slow speeds on Route 54 will still be required. MoDOT will use signage and other methods to control the speed of vehicles on Route 54 in Louisiana to help make it safe for all users.

AGENCY COMMENTS

All tribal and agency letters are contained in Appendix B of this FONSI.

- In a letter dated June 3, 2016, to MoDOT, the Quapaw Tribe of Oklahoma indicated this project is outside of the current area of interest for the Tribe. Therefore, the Quapaw Tribe does not desire to comment on the project at this time. The Tribe thanked MoDOT for its efforts to consult with the Tribe.
- In a letter dated July 27, 2016, to FHWA Missouri Division Office, the U.S. Environmental Protection Agency (EPA), Region 5, offered the following comments:
 - Page 34 of the Draft EA, in the discussion of the Preferred Alternative, states, “The Adjacent Downstream Green alternative is the Preferred Alternative to solve the transportation problems associated with the Route 54 Bridge. This alternative would construct a new two-lane bridge approximately 50-feet south of the existing bridge. The new bridge would likely terminate west of the levee.” The rest of the EA indicates, through figures and narrative information, that the new bridge will in fact end west of the Sny levee; otherwise, a discussion on the need for a Section 408 (Section 14 of the Rivers and Harbors Act of 1899; codified in 33 USC 408) levee permit from the U.S. Army Corps of Engineers (USACE) should have been included.

Recommendation: The Final EA should state the project’s start and terminus in a definitive manner, including clearly stating where the bridge will end.

Response: As stated in the EA, the project begins from the intersection of Route 54 and Missouri Route 79 North in the city of Louisiana, Missouri, to the intersection of Route 54 and Township Road 400 North in Pike County, Illinois. In Missouri, the new bridge will

begin at the same location as the current bridge. The bridge terminus in Illinois will not be known until a hydraulic study is completed to determine the bridge length for satisfying the 100-year no-rise certification requirements. The Section 408 authorization listed in the Required Permits section, page 16 of this FONSI, is being pursued for a levee alteration.

- Page 35 of the Draft EA states, “Selection of a preferred bridge and intersection alternative will not be finalized until substantive comments from resource agencies and the public hearing are fully evaluated and addressed.” However, the Draft EA clearly identifies a Preferred Alternative (Green-Adjacent Downstream) which is paired only with intersection Option 3. Therefore, this statement contradicts information provided in the Draft EA.

Recommendation: This contradictory statement should be rectified.

Response: FHWA usually identifies a preferred alternative in its EAs—in this case it is the Green Alternative. After consideration of public and agency comments, either the preferred alternative remains as stated in the EA or it is possible the preferred alternative could change and would be memorialized in the FONSI or require further analysis in an EIS and ROD. Based on comment consideration, the Green Alternative remains the preferred alternative.

- Page 64 of the Draft EA states, “Removal of suitable roost trees may affect, but is not likely to adversely affect, Indiana and Northern long-eared bats based on winter tree clearing. FHWA is requesting concurrence from the USFWS for that determination.” On July 18, 2016, EPA staff, in a discussion with U.S. Fish and Wildlife Service (USFWS) staff, learned that USFWS had not been provided a copy of the Draft EA, nor had a request for review and concurrence with FHWA’s determination of “may affect, not likely to adversely affect” been requested or received by USFWS.

Recommendation: EPA recommends that FHWA ensure that a request has been made to USFWS staff (Marion, IL suboffice) to review FHWA’s determination. Concurrence from USFWS should be received before the project’s decision document is finalized.

Response: USFWS was provided a copy of the Final EA on July 1, 2016. The USFWS responded in writing on August 12, 2016. The result of the consultation is explained under Summary of Impacted Resources, Natural Habitat and Threatened and Endangered Species, page 9 of this FONSI.

- In an email dated August 5, 2016, to MoDOT, the Illinois Department of Agriculture (IDOA) indicated, “After further consideration the IDOA has no further comments on the Final Environmental Assessment. Earlier coordination with the Missouri Department of Transportation in May 2014 resulted in the completion of the USDA NRCS Form AD-1006 for the preferred alignment. Selection of the preferred alignment to improve capacity and traffic safety addressed and minimized agricultural impacts to the greatest extent possible. Therefore, the IDOA considers the project in compliance with the Illinois Farmland Preservation Act.”

- In a letter dated August 5, 2016, to MoDOT, the Missouri Department of Natural Resources (MDNR) offered the following comments:

- provided a link to its technical bulletin, “Managing Construction and Demolition Waste” and provided contact information for its Solid Waste Management Program

Response: Information noted.

- offered general information on the project’s ecological drainage unit and watersheds and suggested that this information may be needed for mitigation.

Response: Information noted.

- identified Town Branch as a classified stream that could be impacted by the project. The stream runs along Highway 54 veering southward and could receive sediment from the

improvements planned for the Highway 54 and Highway 79 intersection and suffer impacts in the form of runoff during rain events.

Response: Town Branch, a classified stream that meanders approximately one quarter to one third of a mile south and southwest of the western project limit, will not be impacted by this project. Four to five city blocks including houses, lawns, trees, streets, curbs, and gutters separate the project area from Town Branch. Although this project is not within a MoDOT regulated municipal separate storm sewer system (MS4), because it will involve more than 1 acre of disturbed land, MoDOT will comply with the land disturbance requirements. MoDOT's Storm Water Pollution Prevention Plan (SWPPP; revised August 2014) outlines various best management practices (BMPs) that will be used to protect all local streams and other conveyance systems to streams, including storm sewers. The project design will specify all areas where temporary BMPs will be used, inspected on a regular basis, and maintained as necessary to ensure stormwater protection.

- indicated there are none of the following in the project/construction area:
 - known water bodies without designated uses
 - metropolitan no-discharge streams in the construction area
 - biocriteria reference streams within the proposed project area
 - outstanding state and national resource waters or cold water fisheries in the project area
 - impaired waters within the Missouri part of the proposed project area
 - approved Total Maximum Daily Load studies within the proposed project area
 - certified wells in the area
 - public drinking water protection areas in the area
 - USGS gaging stations
 - losing streams, sink holes, or other evidence of karst topography within the immediate project area
 - Conservation Opportunity Areas affected by the project
 - adjoining DNR property
 - known prior or concurrent projects in the proposed project area

Response: Information noted.

- identified two public water intakes (one active and one inactive) approximately 0.4 mile downstream of the proposed project site. MDNR indicates that MoDOT should coordinate with Louisiana Water Department should water quality concerns arise that would affect drinking water intake. MDNR further states that if dredge discharge is granted for the Mississippi River, it should be discharged downstream of the public water intake.

Response: This information was noted in the Final EA and notification of water quality concerns to the Louisiana Water Department and depositing dredge downstream of the public water intake is given in commitment number 5, page 12 of this FONSI.

- identified several known department stream assessment or biological monitoring stations near the proposed project site with only one being close enough to be directly affected by the project. MDNR's Water Quality Assessment Unit reports it has not been actively monitored since 2001 and have no objection to the project based on this monitoring site. There are no known Volunteer Water Quality Monitoring stations near the river segment containing the proposed project.

Response: Information noted.

- identified a high potential for the project to affect wetlands, particularly in the floodplain. MDNR recognized the wetland mitigation plan agreed upon between MoDOT, IDOT, USACE, and Great River Land Trust (GRLT). MDNR indicated that if impacts occur within

Missouri, coordination with the department is expected as part of the Clean Water Act Section 401 Water Quality Certification Process.

Response: No wetlands have been found within the project limits in Missouri. However, impacts to the Mississippi River require coordination with MDNR as part of the Clean Water Act Section 401 Water Quality Certification, which is memorialized in the Required Permits section, number 1, page 15 of this FONSI.

- o indicated MoDOT currently operates in accordance with Missouri State Operating Permit Number MO-R100007 issued by MDNR

Response: Information on page 48 and is included in the Required Permits section, number 2, page 15 of this FONSI.

- o indicated MoDOT plans to obtain Section 404/401 authorization where applicable

Response: Information noted and permits listed under number 1, page 15 of this FONSI.

- o indicated the USACE owns land that will be affected by the project and that negotiations are underway for the use of these properties

Response: Information on page 9 of this FONSI.

- o indicated the department's geospatial data is available upon request at <http://msdis.missouri.edu/>

Response: Information noted.

- In a letter dated August 12, 2016, to MoDOT, the U.S. Fish and Wildlife Service (USFWS), Marion, Illinois, Sub-Office indicated the following:

- o USFWS recommends that forested wetland impacts be mitigated for at a minimum 3.0 to 1.0 ratio and that emergent wetland impacts be mitigated for at a 1.5 to 1.0 ratio. In addition, the proposed replacement property to USACE may or may not meet the wetland mitigation requirements depending on if the proposed property is considered protection, enhancement, or restoration of existing wetlands. The Service requests to review the final proposed mitigation plan.

Response: The wetland mitigation ratios are noted; however, according to the Illinois Interagency Wetland Policy Act (IWPA) which established state ratios developed by IDNR for off-site out-of-basin mitigation, wetland impacts will be mitigated at a minimum 2.0 to 1.0 ratio and will be incorporated into the wetland mitigation plan. The planned replacement property for the USACE outgrant is 8.56 acres floodplain forest and will not be used for wetland mitigation. The USFWS will be given the opportunity to review mitigation plans and make its recommendations on mitigation for the USACE to consider during the Clean Water Act Section 404 permit review.

- o Information provided in the EA indicates that the Higgins eye, sheepnose, spectaclecase, decurrent false aster, and eastern prairie fringed orchid were not documented during survey efforts; therefore, the FHWA has determined the proposed project will have no effect on the Higgins eye, sheepnose, and spectaclecase mussels. In addition, FHWA has determined the project will have no effect on the pallid sturgeon. This precludes the need for further action on this project as required under Section 7 of the Endangered Species Act of 1973, as amended for these species.

Response: Information noted under Summary of Impacted Resources, Natural Habitat and Threatened and Endangered Species on page 9 of this FONSI.

- o The proposed project involves 8.5 acres of tree clearing and will be restricted to the November 1 to March 31 time period to avoid impacts to the Indiana bat and northern

long-eared bat. In addition, no caves are known near the project area. Based on this information, the Service concurs that the proposed project is not likely to adversely affect the gray bat, Indiana bat and northern long-eared bat. Should this project be modified or new information indicates listed or proposed species may be affected, consultation or additional coordination with this office, as appropriate, should be initiated.

Response: The seasonal tree clearing restriction dates of November 1 to March 31 are added to commitment number 12, page 12 of this FONSI along with the commitment to repeat a habitat survey for the project impact area to identify any new habitat that has developed.

- Although the bald eagle has been removed from the threatened and endangered species list, it continues to be protected under the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act (BGEPA). The Service developed the National Bald Eagle Management Guidelines to provide landowners, land managers, and others with information and recommendations regarding how to minimize potential project impacts to bald eagles, particularly where such impacts may constitute “disturbance,” which is prohibited by the BGEPA. The Service is unaware of any bald eagle nests in the proposed project area; however, if a bald eagle nest is found in the project area or vicinity of the project area then our office should be contacted and the guidelines implemented.

A copy of the guidelines is available at:

<http://www.fws.gov/midwest/eagle/pdf/NationalBaldEagleManagementGuidelines.pdf>

Response: The project area will be resurveyed for bald eagle use before construction as memorialized in commitment number 13, page 12 of this FONSI. National Bald Eagle Management Guidelines will be implemented if bald eagles or active nests are found. This has been added to commitment number 13.

ADDITIONAL PUBLIC COMMENTS

- In a letter dated January 4, 2016, to the Missouri Highway and Transportation Commission, Pike Grain Company indicated that in addition to Pike Grain Company, Upper Mississippi, Illinois and Missouri River Association (UMIMRA), Sny Levee District, Lower Salt River Basin, Mudlick Prairie Levee District, Pike Grain Drainage & Levee District, the farmers within these districts, and the floodplain would be adversely affected by the embankment approach project design from the Illinois shore to the Champ Clark Bridge. The entities requested MoDOT review and design an elevated “trestle approach” to lessen a flood’s impact on the wetlands and the floodplain. The correspondence outlined the physics of an embankment approach.

MoDOT Response: In a letter dated January 6, 2016, Mr. Ed Hassinger, MoDOT Chief Engineer, thanked the Pike Grain Company for contacting the Missouri Highway and Transportation Commission regarding the design of the replacement structure of the Champ Clark Bridge. He further indicated having learned Pike Grain Company had been an engaged member of the Community Advisory Group (CAG) during the EA process. Mr. Hassinger indicated as the project moves into the design phase, a hydraulic analysis will be conducted to evaluate the existing and proposed conditions, and the project will have to meet various design and permit requirements, including that the bridge can cause no increase in upstream flooding compared to the existing conditions. Mr. Hassinger stated he believes the design requirement will fully address the company’s concerns. Additionally, he indicated the final design will be determined to meet the hydraulic conditions, design, and permit requirements, and cost considerations. Mr. Hassinger thanked Pike Grain Company for participating on the CAG and encouraged them to be engaged in the community engagement for this project.

Pike Grain Company Response: In a letter dated January 13, 2016, Pike Grain Company thanked Mr. Ed Hassinger for responding to the concerns for the eastern approach to the new proposed bridge at Louisiana. The letter stated both Missouri and Illinois are concerned over the existing

condition of the eastern approach and that the existing condition during flooding increases the river level by at least one and one half to two feet or more depending on flood conditions. The company indicated existing restrictions need to be corrected during the planning of the new bridge and that over the years the eastern approach had been raised, and therefore needs to be corrected. Additionally, the letter stated if the bridge is properly designed, there should be no measurable increase in the river level. In closing, Sny Levee District, Lower Salt River Levee District, and Salt River Association request to be included in the project design discussions and selection.

MoDOT Response: MoDOT will invite the Sny Levee District when it meets with the USACE to discuss the hydraulic study and resulting actions. This action has been included in the Commitments section as number 35, page 15 of this FONSI.

SUMMARY OF IMPACTED RESOURCES

Socioeconomic/Community Impacts

USACE Outgrant

The Selected Alternative impacts 7.13 acres of land that the USACE holds. IDOT will be seeking an outgrant from the USACE in the form of a permanent easement for the property necessary to complete the bridge and Illinois roadway. On April 21, 2016, the USACE, IDOT, MoDOT, and GRLT visited the site offered by the GRLT for the outgrant replacement property located near Godfrey, IL. The USACE stated that the property was forested floodplain and adjacent to currently USACE-owned property, both attributes that the agency expected in a replacement property for this project. The USACE suggested that a Memorandum of Understanding (MOU) be developed and signed between the DOTs and the GRLT outlining the intention to purchase the property for the outgrant process.

Since that meeting, IDOT has written an agreement document, included in Appendix C of this FONSI, that includes a stipulation that the property be preserved in its natural state. The document reviewed and signed by IDOT and the GRLT indicates their agreement to accept the terms to proceed with the necessary work to acquire the replacement property from the GRLT. Since MoDOT is not involved in the real estate transactions in Illinois, it was not included as a signatory in the document.

Other environmental reviews of the site including a wetland delineation and archaeological survey are scheduled to be completed and reports submitted to IDOT in the fall of 2016. An ASTM 1528-06: Transaction Screen Report was prepared for the GRLT in September 2014. This report evaluates the environmental risk of hazardous and solid waste for the site. It was concluded that the screening "revealed no evidence of potential environmental concerns and no further action is recommended."

Because the replacement property will not need any physical alternations to satisfy the outgrant requirements, no permits or clearances are ~~need~~ needed from resource agencies. Thus, commitment number 4, page 12 of this FONSI has been altered from the commitment in the EA by removing the need to have regulatory agencies approve reports.

Wetlands and Waters of the U.S.

Waters of the U.S. within the project corridor include the Mississippi River, forested and emergent wetlands in Illinois, and Mud/Plum Point Slough in Illinois. No wetlands are present within the project area in Missouri. Approximately 6.93 acres of forested wetlands and approximately 0.39 acre of emergent wetlands totaling 7.32 acres are expected to be permanently impacted by this project.

The project will require authorization by an Individual Clean Water Act Section 404 Permit from the USACE since the project involves more than one-half acre of permanent impacts of waters of the U.S. IDOT will compensate for permanent impacts to wetlands resulting from this project by debiting at a minimum 13.86 acres of forested and 0.78 acre of emergent wetland from the LaGrange Wetland Mitigation Bank site in Brown County, Illinois. These amounts are based on the Illinois Interagency Wetlands Policy Act, which specifies off-site replacement of wetland impacts must occur at a minimum of a

2.0 to 1.0 ratio. Because this is a design-build project, final compensatory mitigation amounts could change based on USACE permit requirements and final impacts.

Natural Habitat and Threatened and Endangered Species

In accordance with Section 7 of the Endangered Species Act (ESA), FHWA has determined the Selected Alternative will have no effect on most of the federally listed species identified on the USFWS Information, Planning, and Conservation System (IPaC) official species list. Because of the presence of suitable roost-tree habitat for Indiana and northern long-eared bats, FHWA has determined the project may effect, but is not likely to adversely affect these species based on seasonally clearing suitable habitat in the winter months when bats are not present. An additional survey for suitable roost trees within the project corridor will be conducted during the design phase. The USFWS concurred with the FHWA determination in their comments to the EA on August 12, 2016.

Because bald eagles can begin nesting in the vicinity of the bridge prior to construction, an additional bald eagle nest survey will be conducted during the design phase. If nests are found, National Bald Eagle Management Guidelines will be implemented.

Public Lands and Potential Section 6(f) and 4(f) Properties

Section 4(f)

Illinois

On the Illinois side of the river, the USACE owns land on both sides adjacent to the existing alignment. Their Two Rivers Recreation Area, which includes the Two Rivers Marina, is a Section 4(f) protected resource located north of existing Route 54. It consists of two boat ramps, a parking lot, and a closed commercial building.

The Selected Alternative will require only temporary easement on the marina and have no impact on the boat ramp. Permanent impacts to Two Rivers Recreation Area will occur at the entrance to the marina. The proposed improved Route 54 roadway is designed for ~~construction~~ constructing eight to ten feet above the existing roadway making it necessary to modify the entrance to maintain access to Two Rivers Marina. The area of the current entrance is approximately 0.07 acre. The EA indicated the new entrance would be widened on either side of the existing entrance approximately 0.16 acre. However, since the EA was approved, this amount has been reduced to 0.12 acre. The area of the new completed entrance will now total approximately 0.19 acre rather than 0.23 acre as was originally designed.

Once tied into Route 54, the entrance will be repaved. The new paved entrance will be designed to accommodate vehicles pulling large trailers to facilitate turning movements. Auxiliary lanes such as a right lane and a center left turn lane are proposed to enhance safety for users as they enter the marina.

MoDOT will construct a temporary entrance to the marina to provide continuous access during construction. This entrance approximately 140 feet east of the existing entrance will use 0.17 acre of adjacent USACE land that does not contain recreational uses. The temporary entrance will include a 20-foot wide, 270-foot long aggregate drive that could be constructed in one day. MoDOT will ensure that upon completion of the Two Rivers Marina permanent entrance, the temporary entrance will be re-graded to pre-existing conditions to match the surrounding area.

A 0.91-acre temporary construction easement will be required to access and construct both the permanent and temporary entrances. See temporary entrance plan on the eighth page of Appendix D of this FONSI. FHWA has determined that potential impacts to Two Rivers Recreation Area, including Two Rivers Marina, are *de minimis* in that the proposed construction and completed project will not adversely impact the activities, features, and attributes of the facility that qualifies the property for Section 4(f) protection. To make the Section 4(f) *de minimis* finding, written concurrence is required from the USACE as the officials with jurisdiction (OWJ).

On December 22, 2015, letters were submitted to the USACE and to the management of Two Rivers Marina requesting concurrence with FHWA's *de minimis* finding. On April 16, 2016, the USACE emailed

MoDOT requesting public hearing comments for consideration prior to signing the letter. The public hearing had not yet been held at this time; however, MoDOT agreed to provide the comments to the USACE after the public hearing had been conducted.

On April 21, 2016, a project meeting was held at the USACE Rivers Project Office where the Section 4(f) impacts were discussed. The meeting included representatives from the USACE, IDOT, MoDOT, and Two Rivers Marina.

Subsequent to this meeting, MoDOT received a letter from the USACE St. Louis District dated August 26, 2016. This letter indicated the agency had reviewed MoDOT's December 22, 2015, initial letter requesting USACE's concurrence with the Section 4(f) *de minimis* determination of Two Rivers Recreation Area, as well as listing the topics discussed in the April 21 2016, meeting. Conclusions from that meeting included the following:

1. Specifications will be added to the construction contract to make the entrance at minimum 30 feet in width and have the ability to accommodate tractor trailers and large boat trailers, which will be using the boat ramp facilities.
2. Staging areas used during construction shall have 4 inches of CA6 or asphalt placed upon completion of use as a staging area.
3. A 4:1 slope will be constructed on the sides of the newly constructed entrance to accommodate a riding lawn mower.
4. Access to Two Rivers Marina, including all existing boat ramps, is not compromised during the construction phase.
5. Grading of the parking lot will allow for runoff water to slope away from the marina.

The letter further states that the USACE had met with the marina lessee and after evaluating options for the entrance road, the USACE recommendation is to align the permanent entryway non-perpendicular to Route 54 to reduce potential impacts to Two Rivers Recreation Area, including Two Rivers Marina, from proposed construction and the completed project. This would reduce the potential for the project to adversely affect the day-to-day operations of the facility. Further, the USACE requested clarification and assurance that the above topics be considered as part of the *de minimis* finding and requested a more detailed design drawing.

In an email on August 2, 2016, MoDOT submitted all public comments to the USACE from the public hearing that was held on June 9, 2016. No comments were received regarding impacts to Two Rivers Recreation Area and Two Rivers Marina.

Based upon additional conversations with MoDOT's project manager, the management of Two Rivers Marina expressed concerns regarding the possible closure of the existing entrance during construction. The USACE and Two Rivers Marina management also expressed concerns regarding the final construction plans for the permanent entrance. As a result of these concerns, on September 16, 2016, MoDOT's project manager met with representatives of the USACE and Two Rivers Marina. Based on this meeting, MoDOT agreed to the specific conditions requested by the USACE outlined in the agency's August 26, 2016, letter discussed above.

On September 19, 2016, MoDOT submitted a final letter to the USACE committing MoDOT to the following conditions:

1. The new marina entrance shall be constructed at a minimum width of 30 feet to accommodate tractor trailers and large boat trailers.
2. Any contractor staging area on U.S. Army Corps of Engineers property shall be restored to its original condition once the property is no longer needed.
3. The new marina entrance shall be constructed with minimum 4:1 side slopes to facilitate future maintenance.

4. MoDOT and the contractor shall provide continuous access to U.S. Army Corps of Engineers property throughout the life of the project.
5. Any grading of the Two Rivers Recreation Area and Two Rivers Marina parking areas will allow for runoff water to slope away from the marina.
6. Prior to construction, MoDOT will provide the plans for the marina entrance design to the U.S. Army Corps of Engineers and Two Rivers Marina for review.

These conditions have been added as commitment number 17, page 13 of this FONSI.

On September 21, 2016, the USACE submitted the signed Section 4(f) concurrence letter to MoDOT, concurring with FHWA's *de minimis* determination.

Included in Appendix D of this FONSI is MoDOT's Section 4(f) *De minimis* Impact Determination memorandum requesting FHWA concurrence, the Section 4(f) concurrence letter signed by the USACE, email correspondence between the USACE and MoDOT, USACE's letter of August 26, 2016, and MoDOT's design drawings for the proposed temporary and permanent entrances for Two Rivers Recreation Area.

Other Resources

Considering all public and agency comments and agency coordination, the impacts and commitments for the following resources associated with the Selected Alternative have not changed since the EA was approved:

- Land Use
- Prime and Unique Farmland
- Socioeconomic/Community Impacts associated with
 - Economic Growth and Development
 - Pedestrian and Bicycle Traffic
 - Right of Way Acquisitions and Easements
 - Environmental Justice
 - Public Services
- Water Quality
- Navigable Waterways
- Floodplains including FEMA Buyout Properties
- Wild and Scenic Rivers
- Air Quality
- Noise
- Historic and Archaeological Resources
 - The Programmatic Section 4(f) Evaluation and Approval for FHWA Projects that Necessitate the Use of Historic Bridges for FHWA request for approval is located in Appendix E of this FONSI.
- Section 6(f)
- Hazardous Waste
- Construction Impacts
- Indirect and Cumulative Effects

COMMITMENTS

1. MoDOT and IDOT will explore ways to minimize impacts to the USACE lands throughout the design process, which may include the use of rock fill to steepen the fill slopes, retaining walls, or other methods to reduce the roadway footprint.
2. MoDOT and IDOT will upgrade to current Americans with Disabilities Act of 1990 (ADA) standards any sidewalks that are within right of way and the project construction limits.

3. MoDOT and IDOT will ensure that the Uniform Relocation Assistance and Real Property Acquisition Policies Act of 1970, as amended, be carried out without discrimination based on race, color, national origin, religion, and age and in compliance with Title VI (the Civil Rights Act of 1964), the President's Executive Order on Environmental Justice, and the Americans with Disabilities Act. In accordance with the Uniform Act and the states' relocation programs, fair market compensation will be provided to property owners who are affected by this project.
4. IDOT will make the USACE "whole" by acquiring in fee at a minimum 7.13 acres of property considered at least equal to or greater in wetland value and function and transfer title to the USACE. Project construction will not begin until a specific site plan for the out-grant replacement and wetland mitigation is agreed upon by the USACE and IDOT. MoDOT and IDOT will ensure any required environmental and cultural resources reviews are complete for the Great Rivers Land Trust (GRLT) property prior to FHWA's issuance of the authorization to construct.
5. MoDOT will coordinate with the Louisiana Water Department should water quality concerns arise that may negatively affect public drinking water such as an accidental petroleum or chemical spill from contractor operations. If dredge discharge were to be authorized in the Mississippi River, MoDOT would discharge this material downstream from Louisiana's public drinking water intake.
6. IDOT will compensate for permanent impacts to wetlands resulting from this project through standard mitigation practices. An accepted mitigation plan and replacement ratio at a minimum 2:1 will be established during Clean Water Act Section 404 permitting and in place prior to project construction.
7. MoDOT will coordinate with USCG to halt river traffic during demolition activities. The contractor shall submit a work plan to the USCG who will in turn issue a permit that includes specific requirements such as displaying lights to alert river traffic of barges and new piers. Temporary lighting and signage will be installed to direct and warn boaters and barges of construction on the bridge.
8. MoDOT will design the roadway to a 500-year flood level at 466.1 feet mean sea level (msl) to accommodate the potential Sny Levee 500-year certification.
9. MoDOT will conduct a noise analysis should changes to the Selected Alternative result in reclassification to a Type I project.
10. MoDOT will inspect the Champ Clark Bridge for nests of bird species protected by the MBTA prior to demolition. If active nests (those with eggs or young) are observed, measures will be taken, including seasonal demolition restrictions, to prevent killing birds and destruction of their eggs and to avoid conflict with the MBTA. Seasonal restrictions on removal of nests are placed during nesting season, generally between April 1 and August 15. If restriction dates are not feasible, the bridge will be maintained to prevent birds from nesting using methods such as exclusionary devices or nest removal prior to egg laying. In some instances, MoDOT has obtained depredation permits from the USFWS with the help of U.S. Department of Agriculture/Animal and Plant Health Inspection Service (USDA/APHIS) for removal of nests that contain eggs from bridges under construction. This permit will be used as a "last resort" where methods to prevent nesting have been unsuccessful.
11. MoDOT will employ the use of repelling charges and millisecond delays during demolition of the bridge to scare fish from the area before bridge spans are dropped into the water.
12. MoDOT will conduct another habitat assessment within the project corridor during the design phase to identify new potentially protected Indiana and northern long-eared bat roost trees. MoDOT will mark and record GPS coordinates of potential roost trees to be removed. MoDOT will incorporate seasonal tree clearing restrictions as a job special provision within the contract only allowing suitable roost tree removal from November 1 to March 31 as a conservation measure to avoid adversely affecting northern long-eared and Indiana bats.
13. MoDOT or IDOT will conduct an additional survey for bald eagle nests during the design phase and will inspect the existing Champ Clark Bridge for nests of species protected by the MBTA. If nests of MBTA-protected species are discovered, seasonal restrictions for demolition or exclusionary devices will

be employed. If bald eagle nests are discovered, National Bald Eagle Management Guidelines will be implemented.

14. MoDOT and IDOT will conduct additional archaeological investigations when a final alignment is selected and right of access is received. Any additional archaeological sites that might be affected by the project will be addressed in accordance with the regulations (36 C.F.R. 800) implementing Section 106 of the National Historic Preservation Act (16 U.S.C. 470). Identified cultural resources will be evaluated according to the Department of the Interior's "Standards and Guidelines for Archaeology and Historic Preservation," in consultation with the Missouri and Illinois SHPOs.
15. As stipulated in the Section 106 MOA, MoDOT and IDOT will operate under a phased approach, which will ensure that additional work is completed for identifying and assessing the archaeological resources for this project. MoDOT and IDOT will ensure that all stipulations outlined in the Section 106 Memorandum of Agreement (MOA) be fulfilled within ten years of the date of execution of the MOA by FHWA.
16. If a viable reuse plan is presented for the bridge, FHWA, MoDOT, IDOT, and the Missouri and Illinois SHPOs will evaluate the plan to determine whether the Champ Clark Bridge can be preserved. If the bridge cannot be preserved, MoDOT will:
 - a. remove name plates and donate them to the city of Louisiana
 - b. take archival photographs and prepare a history of the bridge
 - c. prepare an interpretive panel on the history and engineering of the Champ Clark Bridge for installation in Riverside Park in Louisiana
 - d. prepare a brochure on Mississippi River Bridges for distribution through area attractions and Visitor's Bureaus
 - e. prepare a short documentary video of the Champ Clark Bridge
 - f. send copies of mitigation documentation to the SHPOs for review
 - g. provide the SHPOs and consulting parties the opportunity to review and comment on interpretive materials prior to publication
17. To minimize impacts to Two Rivers Recreation Area and Two Rivers Marina, MoDOT commits to the following:
 - a. The new marina entrance shall be constructed at a minimum width of 30 feet to accommodate tractor trailers and large boat trailers.
 - b. Any contractor staging area on U.S. Army Corps of Engineers property shall be restored to its original condition once the property is no longer needed.
 - c. The new marina entrance shall be constructed with minimum 4:1 side slopes to facilitate future maintenance.
 - d. MoDOT and the contractor shall provide continuous access to U.S. Army Corps of Engineers property throughout the life of the project.
 - e. Any grading of the Two Rivers Recreation Area and Two Rivers Marina parking areas will allow for runoff water to slope away from the marina.
 - f. Prior to construction, MoDOT will provide the plans for the marina entrance design to the U.S. Army Corps of Engineers and Two Rivers Marina for review.
18. For hazardous waste sites at Ayerco #65 and Abel's Quick Shop #1, after right of way is purchased and before construction begins, MoDOT will conduct additional sampling and testing of soils within the footprint of the preferred alternative to determine the level of contamination and any required remediation.
19. MoDOT will ensure that all structures scheduled for demolition are inspected for asbestos-containing material and lead-based paint. MoDOT and the contractor shall submit all required demolition notices, abatements notices, and project notifications to MDNR as required by regulation prior to beginning

demolition activities. Asbestos-containing material and demolition debris will be disposed according to state and federal regulations. The reports of these inspections for asbestos and the presence of lead-based paint will be included in the construction bid proposal.

20. MoDOT will ensure that any known and unknown hazardous waste sites that are found during project construction are handled in accordance with Federal and State laws and regulations. If regulated solid or hazardous wastes are found during construction activities, the MoDOT construction inspector will direct the contractor to cease work at the suspect site. The construction inspector will contact the appropriate environmental specialist to discuss options for remediation. The environmental specialist, the construction office, and the contractor shall develop a plan for sampling, remediation and continuation of project construction. Independent consulting, analytical and remediation services shall be contracted if necessary. As necessary, the MDNR, the IEPA, and USEPA will be contacted for coordination and approval of required remediation activities.
21. MoDOT will ensure that traffic control including warning signs, channelizers, and barricades needed to maintain vehicular traffic safely away from the contractor's operations will be implemented according to MoDOT Standard Specifications and traffic plans. A Traffic Management Plan (TMP) will be developed during project design as part of the final design activities. MoDOT and IDOT will seek input from the city of Louisiana, Twin Rivers Marina, and local businesses in the development of the TMP.
22. MoDOT and IDOT will deploy proactive communications to the public notifying them of traffic closures through a variety of tools including web-based applications, digital sign messaging, and other conventional media outlets. MoDOT and IDOT will publish construction-related news releases and information on their web sites at www.modot.org and www.idot.illinois.gov, for those with Internet access.
23. MoDOT, IDOT, and the contractor will work closely with Twin Rivers Marina to provide the marina with suitable uninterrupted river access. MoDOT will coordinate with the USCG to schedule dates of the closures of the navigation channel including the duration of these closures.
24. MoDOT shall negotiate and execute an agreement with the Burlington Northern Santa Fe Railroad (BNSF) prior to seeking project federal authorization for construction. To avoid train traffic interruptions, the contractor shall coordinate with BNSF to schedule girder settings and for handling other materials over the railroad tracks. Railroad flagmen shall be retained during construction when potential impacts to the rail system could occur. Construction of nearby bridge piers shall require flaggers during construction operations.
25. MoDOT will ensure that details of utility disposition are determined during project design. Agreements with utilities shall be negotiated and executed prior to seeking project federal authorization for construction. MoDOT and IDOT utility engineers and representatives of the various utilities shall plan the details of individual utility adjustments on a case-by-case basis. MoDOT and IDOT will disconnect and reconnect electrical service lines on the bridge responsible for navigating lighting to the new structure. Temporary power or lights will be maintained for navigational lighting during construction.
26. MoDOT will ensure that materials resulting from clearing and grubbing, demolition, or other operations, except materials to be retained, are removed from the project site and disposed at a construction landfill by a licensed contractor.
27. MoDOT will ensure that open burning of trees, brush, or other waste are limited to amounts that cannot be marketed or reused on site.
28. MoDOT will ensure that contractors control fugitive dust to prevent it from migrating off the limits of the project corridor. Watering the ground or using dust-retarding chemicals and washing vehicles prior to leaving the construction site may be employed to reduce the generation and transport of fugitive dust. All methods must comply with applicable federal, state, and local laws and regulations.

29. MoDOT will include standard specifications in the construction contract that emissions from construction equipment are controlled in accordance with emission standards prescribed under state and federal regulations.
30. MoDOT will include standard specifications in the construction contract requiring all contractors to comply with every applicable local, state, and federal laws and regulation relating to noise levels permissible within and adjacent to the project construction site. MoDOT will schedule demolition blasting during daylight hours to avoid disrupting residential nighttime quiet.
31. MoDOT will ensure that all necessary measures to control turbidity are employed, which may include methods such as curtain walls in slack waters. The use of equipment in the river shall be minimized as much as possible by constructing work pads or coffer dams to access the river and by placing equipment onto barges. All drilled shaft water will be pumped into settling basins and best management practices will be implemented before discharging water back into the river. If possible, dredged material will be discharged toward the bottom of the river rather than at the surface of the water to reduce suspended solids, turbidity, and downstream sedimentation that may degrade water quality and adversely impact aquatic life.
32. MoDOT will ensure that careful refueling practices are employed to limit spills of gasoline and diesel fuels. Oil spills will be minimized by frequently evaluating construction equipment.
33. MoDOT will ensure, at a minimum, the following measures will be included in the SWPPP:
 - a. Locate and protect all temporary storage facilities containing petroleum products, other fuels, and chemicals to prevent accidental spills from entering the streams. Spills that are within 1,640 feet (500 m) of any stream will be addressed within 24 hours of the incident.
 - b. Avoid disposing of cement sweepings, washings, concrete wash water from concrete trucks and other concrete mixing equipment, treatment chemicals, and grouting and bonding materials into streams, wetlands, and any location where water runoff will carry pollutants into streams or wetlands.
 - c. Reseed all areas within the project limits stripped of vegetation as a result of construction activities.
 - d. Protect from draining or filling adjacent wetlands during construction activities within the project corridor.
 - e. In accordance with project permits, excavate, dredge, and fill in watercourses in a manner that minimize increases in suspended solids and turbidity.
 - f. Remove and properly dispose of all debris during every phase of the project.
 - g. To prevent the accumulation of unsightly, harmful, and toxic material in or near area water bodies, avoid disposing of any construction debris or waste material below the ordinary high water mark of any water body or at any location where the material could be introduced into the water or an adjacent wetland due to run-off, flood, wind, or other natural forces.
34. If changes in the project footprint or scope occur that were not evaluated in this document, MoDOT shall re-evaluate the NEPA document to ensure the determinations remain valid.
35. MoDOT will invite the Sny Levee District to meetings with the USACE concerning the hydraulic study, the need for permitting of the bridge, and impacts on the Sny Levee.

Required Permits

1. MoDOT will obtain authorization by an Individual Clean Water Act Section 404 Permit from the USACE including Section 401 Water Quality Certification from MDNR/IEPA.
2. MoDOT will develop and implement two SWPPPs to comply with the Missouri State Operating Permit No. MO-R 100007 and the IEPA general NPDES Permit ILR10.

3. MoDOT will obtain a Section 10 Rivers and Harbor Act of 1899 Letter of Permission from the USACE for fill and excavation within the Mississippi River.
4. MoDOT will obtain prior to construction a Section 9 Bridge Permit from the USCG approving the location and plans of bridges over a commercially navigable waterway in accordance with all applicable federal laws. The contractor shall submit a work plan to the USCG who will in turn issue a permit that includes specific requirements such as displaying lights to alert river traffic of barges and new piers.
5. MoDOT will conduct an engineering analysis for the build alternative prior to submission of the floodplain development permit application to the Missouri State Emergency Management Agency and IDNR/OWR. The contractor shall obtain a floodplain development permit and “no-rise” certification.
6. MoDOT will obtain a Rivers and Harbors Act Section 408 authorization from the USACE for impacts to USACE structures and the Mississippi River.

APPENDIX A

Notice of Availability (NOA)

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NOA Submitted to Missouri Agencies

NOTICE OF AVAILABILITY

**Environmental Assessment:
Mississippi River Bridge at Louisiana, Missouri and Pike County, Illinois
Missouri and Illinois Route 54
Pike County, Missouri and Pike County, Illinois**

The Missouri Department of Transportation (MoDOT), Illinois Department of Transportation, and the Federal Highway Administration (FHWA) are pleased to announce the availability of the *Route 54 Mississippi River Bridge, Pike County, Missouri Job Number J3P2209/Pike County, Illinois Mississippi River Bridge, Job Number D-96-165-10, Environmental Assessment (EA)*. The EA currently is available for public review, and comments will be accepted through June 23, 2016. The EA was prepared in accordance with the National Environmental Policy Act (NEPA), the National Historic Preservation Act, 23 CFR 771, and regulations of the Council on Environmental Quality, to provide guidance in determining the appropriate actions needed to address the deteriorating historic Champ Clark Bridge.

Public Review: Public involvement is considered to be an important component of a successful planning process. An electronic version of this document can be found on MoDOT's Champ Clark Bridge website at <http://www.champclarkbridge.com/champclark/index.php/environmental-assesment>. This website provides access to the EA and related documents on public review. Written comments can be mailed to:

**Mr. Patrick K. McKenna, Director
Missouri Department of Transportation
P.O. Box 270
Jefferson City, MO 65102**

Please submit comments no later than **June 23, 2016**.

The EA will be available for review at Louisiana, Missouri City Hall, the Pike County Missouri courthouse in Bowling Green, Missouri, the Pike County Courthouse in Pittsfield, Illinois, the Missouri Department of Transportation District Office, 1711 S. Highway 61, Hannibal, Missouri, and on the world wide web where indicated above. A limited number of CDs containing the EA will also be available at each of the public review sites, with additional CDs obtainable by request from MoDOT at the address above.

The EA includes a Programmatic Section 4(f) Evaluation for the historic bridge and a Memorandum of Agreement (MOA) for mitigation of adverse effects to the bridge. If you have any questions concerning this announcement, please contact Ms. Raegan Ball, Program Development Team Leader, FHWA Division Office, 3220 West Edgewood, Suite H, Jefferson City, Missouri 65109, or at (573) 638-2620.

NOTICE OF PUBLIC HEARING

A public hearing concerning the replacement of the Route 54 Mississippi River Bridge at Louisiana, Missouri, and Pike County, Illinois, will be held on June 9, 2016, at the Twin Pikes YMCA in Louisiana, Missouri from 4:30–6:30 p.m. The hearing will offer an opportunity for citizens to learn more about the proposal and to provide oral and written comments on the project.

NOTICE OF AVAILABILITY (NOA) Missouri*(*region specific)*

Ms. Lorisa Smith Policy Coordinator Missouri Department of Natural Resources P.O. Box 176 Jefferson City, MO 65102	NOA + EA
Mr. Josh Tapp, NEPA Program Manager Environmental Protection Agency, Region 7 1201 Renner Blvd. Lenexa, KS 66219	NOA
Mr. Robert L. Ziehmer, Director Missouri Department of Conservation 2901 West Truman Boulevard Jefferson City, MO 65109	NOA
Mr. Jorge Lugo-Camacho State Soil Scientist Natural Resource Conservation Service 601 Business Loop 70 West Parkade Center, Suite 250 Columbia, MO 65203	NOA
Mr. Ron Walker, Director Missouri State Emergency Management Agency 2302 Militia Drive Jefferson City, MO 65101	NOA
*Mr. Danny D. McClendon, Regulatory Branch Chief U.S. Army Corps of Engineers, St. Louis District Attention: CEMVS-OD-F 1222 Spruce Street St. Louis, MO 63103-2833	NOA + EA
*Mr. Gary W. Lenz, Regulatory Branch Chief U.S. Army Corps of Engineers, Rock Island District Attention: CEMVR-OD-P P.O. Box 2004 Rock Island, IL 61204-2004	NOA + EA
Ms. Amy Salveter, Field Supervisor U.S. Fish and Wildlife Service Columbia Field Office 101 Park De Ville Drive, Suite A Columbia, MO 65203	NOA
Federal Assistance Clearinghouse Office of Administration State Capitol Building, Room 125 201 West Capitol Avenue, P.O. Box 809 Jefferson City, MO 65102	NOA
Mr. Ken Sessa, Regional Environmental Officer FEMA Region VII 9221 Ward Parkway, Suite 300 Kansas City, MO 64114-3372 816/283-7960	NOA

Ms. Nekloe Alligood, Department Director Delaware Nation of Oklahoma NAGPRA/Cultural Preservation P.O. Box 825 Anadarko, OK 73005	NOA
Ms. Julia Olds Cultural Resources Officer Miami Tribe of Oklahoma Cultural Resources Office P.O. Box 1326 Miami, OK 74355	NOA
Mr. Johnnie Jacobs, Manager Muscogee Creek Nation Historic and Cultural Preservation Office P.O. Box 580 Okmulgee, OK 74447	NOA
Dr. Andrea Hunter Tribal Historic Preservation Officer Osage Nation 627 Grandview Pawhuska, OK 74056	NOA
Chief John P. Froman Peoria Tribe of Oklahoma P.O. Box 1527 Miami, OK 74355	NOA
Mr. Everett Bandy Tribal Historic Preservation Officer Quapaw Tribe of Indians P.O. Box 765 Quapaw, OK 74363	NOA
Mr. Leonard Longhorn Cultural Preservation Director/Tribal Historic Preservation Officer Absentee-Shawnee Tribe of Oklahoma 2025 South Gordon Cooper Drive Shawnee, OK 74801	NOA
Chief Glenna J. Wallace Eastern Shawnee Tribe of Oklahoma P.O. Box 350 Seneca, MO 64865	NOA

NOA Submitted to Illinois Agencies

NOTICE OF AVAILABILITY

**Environmental Assessment:
Mississippi River Bridge at Louisiana, Missouri and Pike County, Illinois
Missouri and Illinois Route 54
Pike County, Missouri and Pike County, Illinois**

The Missouri Department of Transportation (MoDOT), Illinois Department of Transportation, and the Federal Highway Administration (FHWA) are pleased to announce the availability of the *Route 54 Mississippi River Bridge, Pike County, Missouri Job Number J3P2209/Pike County, Illinois Mississippi River Bridge, Job Number D-96-165-10, Environmental Assessment (EA)*. The EA currently is available for review, and comments will be accepted through **August 1, 2016**. The EA was prepared in accordance with the National Environmental Policy Act (NEPA), the National Historic Preservation Act, 23 CFR 771, and regulations of the Council on Environmental Quality, to provide guidance in determining the appropriate actions needed to address the deteriorating historic Champ Clark Bridge.

An electronic version of the EA can be found on MoDOT's Champ Clark Bridge website at <http://www.champclarkbridge.com/champclark/index.php/environmental-assesment>. This website provides access to the EA and related documents on review. Written comments can be mailed to:

**Mr. Patrick K. McKenna, Director
Missouri Department of Transportation
P.O. Box 270
Jefferson City, MO 65102**

Please submit comments no later than **August 1, 2016**.

The EA is available for review at the Missouri Department of Transportation District Office, 1711 S. Highway 61, Hannibal, Missouri, Illinois Department of Transportation District 6 Office, 126 East Ash Street, Springfield, Illinois, and on the world wide web where indicated above. CDs containing the EA are available by request from MoDOT at the address above.

The EA includes a Programmatic Section 4(f) Evaluation for the historic bridge and a Memorandum of Agreement (MOA) for mitigation of adverse effects to the bridge. If you have any questions concerning this announcement, please contact Ms. Raegan Ball, Program Development Team Leader, FHWA Division Office, 3220 West Edgewood, Suite H, Jefferson City, Missouri 65109, or at (573) 638-2620.

NOTICE OF AVAILABILITY (NOA) Illinois

Mr. Kenneth Westlake, Chief NEPA Section U.S. Environmental Protection Agency, Region 5 77 West Jackson Boulevard Chicago, IL 60604-3507	NOA + EA
Ms. Aleshia Kenney, Fish and Wildlife Biologist U.S. Fish and Wildlife Service Rock Island Field Ecological Services Field Office 1511 47 th Avenue Moline, IL 61265	NOA + EA
Ms. Terry Savco Illinois Department of Agriculture Bureau of Land and Water Resources P.O. Box 19281 Springfield, IL 62794-9281	NOA
Mr. Sheldon Fairfield Illinois Department of Natural Resources Transportation Review One Natural Resources Way Springfield, IL 62702-1271	NOA
Ms. Deana Poe Bureau of Water Illinois Environmental Protection Agency 1021 North Grand Avenue East PO Box 19276 Springfield, IL 62794-9276	NOA
Ms. Rachel Leibowitz, Deputy State Historic Preservation Officer Illinois State Historic Preservation Agency 1 Old State Capitol Plaza Springfield, IL 62701	NOA
Mr. Christopher Johnson, County Highway Engineer Pike County Highway Department 1101 Lakeview Heights P.O. Box 514 Pittsfield, IL 62363	NOA
Mr. Mike Reed, Superintendent Sny Island Levee Drainage District 490 North Main PO Box 169 New Canton, IL 62356-0169	NOA
Ms. Sarah Plinski, Assistant to Director Illinois Emergency Management Agency 2200 South Dirksen Parkway Springfield, IL 62703	NOA
Mr. Ivan Dozier, State Conservationist Natural Resources Conservation Service 2118 West Park Court Champagne, IL 61821	NOA

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APPENDIX B

Agency Comments

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QUAPAW TRIBE OF OKLAHOMA

P.O. Box 765
Quapaw, OK 74363-0765

(918) 542-1853
FAX (918) 542-4694

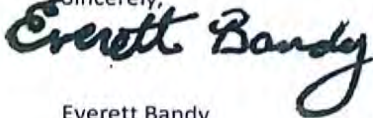
June 3, 2016

Mr. Patrick K. McKenna, Director
Missouri Department of Transportation
P.O. Box 270
Jefferson City, MO 65102

Re: Environmental Assessment
Mississippi River Bridge at Louisiana, Missouri and Pike County, Illinois
Missouri and Illinois Route 54, Pike County, Missouri and Pike County, Illinois

Dear Patrick,

This project is outside of the current area of interest for the Quapaw Tribe; therefore, the Quapaw Tribe does not desire to comment on this project at this time. Thank you for your efforts to consult with us on this matter.

Sincerely,


Everett Bandy
Tribal Historic Preservation Officer
Quapaw Tribe of Oklahoma
P.O. Box 765
Quapaw, OK 74363
(p) 918-238-3100



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

REPLY TO THE ATTENTION OF:

E-19J

Raeagan Ball
Federal Highway Administration
3220 West Edgewood, Suite H
Jefferson City, Missouri 65109

RE: Draft Environmental Assessment – Replacement of the US Route 54 Mississippi River Bridge between Louisiana, Missouri (Pike County, MO) and Pike County, Illinois

Dear Ms. Ball:

The U.S. Environmental Protection has reviewed a Draft Environmental Assessment (Draft EA) prepared by the Federal Highway Administration (FHWA) and the Missouri Department of Transportation (MoDOT) for the proposed replacement of the Champ Clark Bridge which carries US Route 54 over the Mississippi River between Louisiana, Missouri and Pike County, Illinois. This letter provides our comments on the Draft EA, pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

The Champ Clark Bridge opened to traffic in 1928 as a toll bridge and was taken into the state highway system in 1953. The existing through truss structure crosses the Mississippi River at River Mile 283.2 and is eligible for listing on the National Register of Historic Places. The 20-foot-wide deck carries two 10-foot lanes with no shoulders. Missouri's current standards for new bridges longer than 1000 feet call for 12-foot lanes and 10-foot shoulders, making the bridge "functionally obsolete." Furthermore, the narrow bridge width is a concern for local residents due to the potential for conflict between passenger vehicles, large trucks, and farm equipment that often use the bridge.

The Champ Clark Bridge over the Mississippi River provides an important connection between Illinois and Missouri. The current and projected traffic volumes indicate that it will continue to perform at an acceptable level. However, the 83-year-old bridge is structurally deficient and requires continual maintenance, and is functionally obsolete due to its substandard lane width, vertical clearance, and lack of shoulders. Rehabilitation can extend the expected life of the bridge, but continues to be a temporary solution that does not address the major concern of substandard bridge width. The bridge is reaching the end of its useful life and, as its deterioration continues, it will eventually cost more to maintain than to replace. Additionally, the approach to the bridge on the Illinois side forms a notch in the existing Sny Levee. This requires

maintenance staff to protect 45,000 acres of farmland by sandbagging during flood events, at which time US Route 54 must be closed.

The Draft EA assessed the environmental impacts associated with the No Action Alternative and three build alternatives (adjacent upstream alignment, adjacent upstream improved alignment, and adjacent downstream alignment). Each build alternative proposes a new 44-foot bridge width with two 12-foot travel lanes and 10-foot shoulders, and meet the current lane width and 16.5-foot vertical clearance design standard. All build alternatives would incorporate improvements to the US Route 54/Route 79 South intersection immediately west of the bridge in Louisiana to accommodate truck turning clearance. Two intersection improvements options were proposed and were tied to specific bridge alignment alternatives.

The Preferred Alternative was identified as construction of a new bridge on an adjacent downstream alignment paired with intersection improvement Option 3. Intersection Option 3 proposed realigning a portion of US Route 54 approximately 65 feet south of the existing alignment.

Based on EPA's review of the Draft EA, we offer the following comments:

PROJECT ALTERNATIVES/PREFERRED ALTERNATIVE

- Page 34 of the Draft EA, in the discussion of the Preferred Alternative, states, "*The Adjacent Downstream Green alternative is the Preferred Alternative to solve the transportation problems associated with the Route 54 Bridge. This alternative would construct a new two-lane bridge approximately 50-feet south of the existing bridge. The new bridge would likely terminate west of the levee.*" The rest of the EA indicates, through figures and narrative information, that the new bridge will in fact end west of the Sny levee; otherwise, a discussion on the need for a Section 408¹ levee permit from the U.S. Army Corps of Engineers (USACE) should have been included.

Recommendation: The Final EA should state the project's start and terminus in a definitive manner, including clearly stating where the bridge will end.

- Page 35 of the Draft EA states, "*Selection of a preferred bridge and intersection alternative will not be finalized until substantive comments from resource agencies and the public hearing are fully evaluated and addressed.*" However, the Draft EA clearly identifies a Preferred Alternative (Green-Adjacent Downstream) which is paired only with intersection Option 3. Therefore, this statement contradicts information provided in the Draft EA.

Recommendation: This contradictory statement should be rectified.

¹ Section 14 of the Rivers and Harbors Act of 1899; codified in 33 USC 408

THREATENED AND ENDANGERED SPECIES/CRITICAL HABITAT

- Page 64 of the Draft EA states, “*Removal of suitable roost trees may affect, but is not likely to adversely affect, Indiana and Northern long-eared bats based on winter clearing. FHWA is requesting concurrence from the USFWS for that determination.*” On July 18, 2016, EPA staff, in a discussion with U.S. Fish and Wildlife (USFWS) staff, learned that USFWS had not been provided a copy of the Draft EA, nor had a request for review and concurrence with FHWA’s determination of “may affect, not likely to adversely affect” been requested or received by USFWS.

Recommendation: EPA recommends that FHWA ensure that a request has been made to USFWS staff (Marion, IL suboffice) to review FHWA’s determination. Concurrence from USFWS should be received before the project’s decision document is finalized.

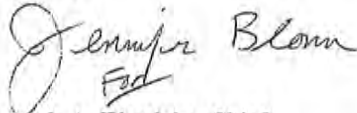
Interstate projects such as this one, where multiple state and federal resource agencies across two or more states are involved, are not uncommon. On July 1, 2016, EPA Region 5 was notified via an email from MoDOT that Illinois resource agencies had not been notified of the public comment period and release of the Draft EA, the comment period for which had closed on June 23, 2016. A copy of the Draft EA was mailed to EPA Region 5 and the comment period was reopened for Illinois agencies from July 1, 2016 to August 1, 2016. Our offices did not receive the Draft EA until July 8, 2016, and as noted below, the wetland delineation and bat surveys were omitted from the original submittal.

In reviewing the final NEPA-404 merger meeting minutes for this project (meeting held September 4, 2014), both the meeting minutes themselves, the EA, and appendices to the EA state that the wetland delineation report would be included as an appendix to the EA. Neither the project wetland delineation report nor a USACE jurisdictional determination were included with the EA. Additionally, bat survey data were also to be included as an appendix to the EA per the NEPA-404 merger meeting minutes from September 4, 2014. EPA Region 5 requested these documents in emails from EPA to FHWA on July 13, 2016, again on July 19, 2016, and in a voice mail to you on July 20, 2016. The requested documents were ultimately provided to EPA Regions 5 and 7 via email by MoDOT on July 21, 2016.

EPA strives to provide comments in a timely manner during the NEPA process, the comment periods of which have timeframes to ensure project progress. For nearly half of the open comment period, EPA Region 5 either did not have the Draft EA to review, or did not have all documents associated with the Draft EA, which can affect our ability to provide timely and relevant comments during the required NEPA process. EPA requests that future NEPA documentation for this project be provided to all involved resource agencies in a timely manner so as to ensure that all agencies have the opportunity to provide input and help inform decision-making.

Thank you for the opportunity to review and provide comments on the Draft EA. We look forward to working with you, and to reviewing future NEPA documentation for this project. Please ensure that copies of NEPA documentation are sent to both EPA Region 5 and EPA Region 7. If you have any questions about this letter, please contact the lead project reviewer for Region 5, Ms. Liz Pelloso, PWS, at 312-886-7425 or via email at pelloso.elizabeth@epa.gov.

Sincerely,

A handwritten signature in black ink that reads "Jennifer Blom". The signature is written in a cursive style. Below the name, the word "For" is written in a smaller, simpler font.

Kenneth A. Westlake, Chief
NEPA Implementation Section
Office of Enforcement and Compliance Assurance

cc (via email):

Jan Piland, FHWA-Illinois
Roopa Banerjee, FHWA-Missouri
Matt Mangan, USFWS-Marion, Illinois
Alan Edmonson, USACE-St. Louis
Joe Summerlin, EPA-Region 7
Gayle Unruh, MoDOT
Jo Ann Dent, MoDOT
Sheldon Fairfield, IDNR
Ken Runkle, IDNR
Felecia Hurley, IDOT-BDE

Jo A. Dent

From: Savko, Terry <Terry.Savko@Illinois.gov>
Sent: Friday, August 05, 2016 9:17 AM
To: Jo A. Dent
Subject: RE: Pike County Route 54 Mississippi River Bridge

Good morning Jo.

After further consideration, the IDOA has no further comments on the Final Environmental Assessment.

Earlier coordination with Missouri Department of Transportation in May 2014 resulted in the completion of the USDA NRCS Form AD-1006 for the preferred alignment. Selection of the preferred alignment to improve capacity and traffic safety addressed and minimized agricultural impacts to the greatest extent possible. Therefore, the IDOA considers the project in compliance with the Illinois Farmland Preservation Act.

Terry

Terry Savko, IL Dept of Agriculture
Bureau of Land and Water Resources
State Fairgrounds, P.O. Box 19281, Springfield, IL 62794-9281
217.785.4458 terry.savko@illinois.gov

From: Jo A. Dent [<mailto:Jo.Dent@modot.mo.gov>]
Sent: Monday, August 01, 2016 1:22 PM
To: Savko, Terry <Terry.Savko@Illinois.gov>
Subject: Pike County Route 54 Mississippi River Bridge

Hello again, Terry.

Thanks for talking with me. Just wanted to email my contact information. Let me know if you have questions or need anything further.

Have a great day!

Jo

Jo Ann Dent
Senior Environmental Specialist
MODOT – Design
601 West Main Street, PO Box 270
Jefferson City, MO 65102
573/526-6680

STATE OF MISSOURI
Department of Natural Resources
DEPARTMENT OF NATURAL RESOURCES

www.dnr.mo.gov

August 5, 2016

Mr. Patrick K. McKenna, Director
Missouri Department of Transportation
P.O. Box 270
Jefferson City, MO 65102

Dear Director McKenna:

The Missouri Department of Natural Resources (department) appreciates the opportunity to review the Environmental Assessment materials for the proposed Champ Clark Bridge project in Pike County, Missouri. The department offers the following comments for consideration.

Solid Waste

The material references the possibility of generating demolition waste. The department's technical bulletin, "Managing Construction and Demolition Waste" has been developed to assist project planners with such activities. This bulletin can be found on the department's web site at <http://dnr.mo.gov/pubs/pub2045.pdf>.

For questions or clarification, please contact Larry Lehman of the department's Solid Waste Management Program at (573) 751-5401.

Water Quality

Location: The proposed project occurs in Section 18, Township 54 North, Range 1 West in Pike County, Missouri. Portions of Landgrant 02483 may also be affected.

Ecological Drainage Unit: The proposed project lies within the Central Plains/Cuivre/Salt Ecological Drainage Unit.

Watersheds: The proposed project in Missouri lies entirely within the Noix Creek - Mississippi River (12-Digit Hydrologic Unit Code No. 071100040701) Watershed.

Ecological drainage unit and watershed locations may be needed should, after avoiding and minimizing impacts to water resources, mitigation be required.



Classified Streams: The proposed project environmental assessment lists the Mississippi River, Mud/Plum Point Slough (in Illinois), wetlands and groundwater as being impacted by the project. Another classified stream that may be impacted is Town Branch (Water Body Identification Number 3960) which runs along Highway 54, then veers southward and could receive sediment from the improvements planned for Highway 54 and Highway 79 intersection(s). Town Branch is about 0.25 miles south of the western intersection and may be close enough to the project area to suffer impacts in the form of sediment runoff during rain events. Town Branch has the beneficial uses of livestock and wildlife watering; warm-water aquatic habitat; irrigation; human health protection; whole body contact recreation-Category B and secondary contact recreation.

Water Bodies Without Designated Uses: The proposed project area contains no known water bodies without designated uses.

Metropolitan No-Discharge Streams: According to the department's current water quality standards, there are no metropolitan no-discharge streams in the construction area.

Biocriteria Reference Streams: There are no biocriteria reference streams located within the proposed project area.

Other Sensitive Waters: There do not appear to be any outstanding state and national resource waters or cold water fisheries in the project area.

Impaired Waters: There are no impaired waters located within the Missouri part of the proposed project area.

Total Maximum Daily Load: There are no approved Total Maximum Daily Load studies located within the proposed project area.

Certified Wells: There are no certified wells currently in the area.

Public Drinking Water Protection Areas: There are no public drinking water protection areas currently in the area.

Public Water Intakes: There are two public water intakes (one active and one inactive) approximately 0.4 miles downstream of the proposed project site. Information on this intake was updated by the department in 2011. MoDOT should coordinate with Louisiana Water Department should water quality concerns arise that would affect the drinking water intake. If dredge discharge is granted for the Mississippi River, it should be discharged downstream of the public water intake.

Monitoring Sites: There are several known department stream assessment or biological monitoring stations near the proposed project site; however, only one is close enough to be directly affected by the project. The Water Quality Assessment Unit reports it has not been

actively monitored since 2001 and they have no objection to the project based on this monitoring site. There are no known Volunteer Water Quality Monitoring stations near the river segment containing the proposed project.

U.S. Geological Survey Gaging Stations: No gaging stations exist near the proposed project sites.

National Wetland Inventory: A high potential exists for the project to affect wetlands, particularly within the floodplain, depending on the exact location of the project. A plan for wetland mitigation has been agreed upon by MoDOT, Illinois Department of Transportation, the U.S. Army Corps of Engineers (USACE) and Great Rivers Land Trust, and suitable property is being investigated for use in wetland mitigation. If impacts occur within Missouri, coordination with the department is expected as part of the Clean Water Act Section 401 Water Quality Certification process.

Karst Topography – Springs, Sinkholes and Caves: It does not appear there are any losing streams, sinkholes or other evidence of karst topography within the immediate project area. The nearest spring is more than one mile away. The department's geospatial data does not indicate the presence of caves in the area.

Land Disturbance Permits: MoDOT currently operates in accordance with Missouri State Operating Permit Number MO-R100007 issued by the department.

Water Quality Certification: A Clean Water Act Section 404 Department of the Army Permit and a Clean Water Act Section 401 Water Quality Certification are needed when placing dredged or fill material into the jurisdictional waters of the United States. The term "jurisdictional waters" refers to large lakes, rivers, streams and wetlands, including those that don't always contain water. MoDOT plans to obtain 404/401 authorization where applicable.

Conservation Opportunity Areas (COAs): There are no Conservation Opportunity Areas affected by the project.

Public Land: The department does not have any property adjoining the proposed project sites. Some land owned by the USACE will be affected by the project and negotiations are underway with the USACE for use of such properties.

Geospatial Data: The department's geospatial data is available upon request, and all published data is available on the Missouri Spatial Data Information Service website at <http://msdis.missouri.edu/>.

Prior or Concurrent Projects: There are no known prior or concurrent projects in the proposed project area.

Champ Clark Bridge project
Page Four

We appreciate the opportunity to provide comments on the proposed bridge project. If you have any questions or need clarification, please contact me or Ms. Kay Craig, phone number (573) 751-3195. The address for correspondence is Department of Natural Resources, P.O. Box 176, Jefferson City, MO 65102. Thank you.

Sincerely,

DEPARTMENT OF NATURAL RESOURCES



Lorisa S. Smith
Policy Coordinator

LSS/mkc





United States Department of the Interior

FISH AND WILDLIFE SERVICE
Marion Illinois Sub-Office (ES)
8588 Route 148
Marion, IL 62959

FWS/MISO

August 12, 2016

Reagan Ball
Federal Highway Administration
3220 West Edgewood, Suite H
Jefferson City, Missouri 65109

Dear Ms. Ball:

Thank you for the opportunity to review and comment on the Environmental Assessment (EA), addressing the US Route 54 Mississippi River Bridge Project. The proposed project is located in Pike County, Missouri and Pike County, Illinois. These comments are prepared under the authority of and in accordance with the provisions of the Fish and Wildlife Coordination Act (48 Stat. 401, as amended; 16 U.S.C. 661 *et seq.*); the Endangered Species Act of 1973 (87 Stat. 884, as amended; 16 U.S.C. 1531 *et seq.*); and, the National Environmental Policy Act (83 Stat. 852, as amended P.L. 91-190, 42 U.S.C. 4321 *et seq.*).

The purpose of the proposed project is to provide a reliable, safe, and cost-efficient Route 54 crossing over the Mississippi River between the city of Louisiana and the state of Illinois. Alternatives considered for this project include no-build, two build alternatives that would use part of the existing bridge, and seven new bridge alternatives. The preferred alternative involves constructing a new bridge 50 feet south of the existing bridge.

Fish and Wildlife Resources

Information in the EA indicates that proposed project will impact 6.93 acres of forested wetland and approximately 0.39 acres of emergent wetland for a total impact of 7.32 acres. This includes 7.13 acres of US Army Corps of Engineers (USACE) lands managed for fish and wildlife resources. The proposed mitigation includes compensation at the LaGrange Wetland Mitigation Bank in Brown County or at the Great Rivers Land Trust in Madison County Illinois. In addition, the proposed compensation will involve acquiring 7.13 acres of wetland habitat of equal or greater value and transferring title to the USACE. The Service recommends that forested wetland impacts be mitigated for at a minimum 3.0 to 1.0 ratio and that emergent wetland impacts be mitigated for at a 1.5 to 1.0 ratio. In addition, the proposed replacement

property to USACE may or may not meet the wetland mitigation requirements depending on if the proposed property is considered protection, enhancement, or restoration of existing wetlands. The Service requests to review the final proposed mitigation plan.

Threatened and Endangered Species

To facilitate compliance with Section 7(c) of the Endangered Species Act of 1973, as amended, Federal agencies are required to obtain from the Fish and Wildlife Service (Service) information concerning any species, listed or proposed to be listed, which may be present in the area of a proposed action. The list for the proposed project area includes the endangered gray bat (*Myotis grisescens*), endangered Higgins eye pearl mussel (*Lampsilis higginsii*), endangered Indiana bat (*Myotis sodalis*), endangered pallid sturgeon (*Scaphirhynchus albus*), endangered sheepsnose mussel (*Plethobasus cyphus*), endangered spectaclecase mussel (*Cumberlandia monodonta*), threatened decurrent false aster (*Boltonia decurrens*), threatened eastern prairie fringed orchid (*Platanthera leucophaea*), and threatened northern long-eared bat (*Myotis septentrionalis*). There is no designated critical habitat in the project area at this time.

Information provided in the EA indicates that the Higgins eye, sheepsnose, spectaclecase, decurrent false aster, and eastern prairie fringed orchid were not documented during survey efforts; therefore, the FHWA has determined the proposed project will have no effect on the Higgins eye, sheepsnose, and spectaclecase mussels. In addition, FHWA has determined the project will have no effect on the pallid sturgeon. This precludes the need for further action on this project as required under Section 7 of the Endangered Species Act of 1973, as amended for these species.

The proposed project involves 8.5 acres of tree clearing and will be restricted to the November 1 to March 31 time period to avoid impacts to the Indiana bat and northern long-eared bat. In addition, no caves are known near the project area. Based on this information, the Service concurs that the proposed project is not likely to adversely affect the gray bat, Indiana bat and northern long-eared bat. Should this project be modified or new information indicate listed or proposed species may be affected, consultation or additional coordination with this office, as appropriate, should be initiated.

Migratory Birds

Although the bald eagle has been removed from the threatened and endangered species list, it continues to be protected under the Migratory Bird Treaty Act and the Bald and Golden Eagle Protection Act (BGEPA). The Service developed the National Bald Eagle Management Guidelines to provide landowners, land managers, and others with information and recommendations regarding how to minimize potential project impacts to bald eagles, particularly where such impacts may constitute "disturbance," which is prohibited by the BGEPA. The Service is unaware of any bald eagle nests in the proposed project area; however, if a bald eagle nest is found in the project area or vicinity of the project area then our office should be contacted and the guidelines implemented. A copy of the guidelines is available at:

<http://www.fws.gov/midwest/eagle/pdf/NationalBaldEagleManagementGuidelines.pdf>

Conclusion

Thank you for the opportunity to provide comment on the EA. For additional coordination, please contact me at (618) 997-3344, ext. 345.

Sincerely,

/s/ Matthew T. Mangan

Matthew T. Mangan
Fish and Wildlife Biologist

cc: FHWA (Fuller, Piland)
USEPA (Peloso)
USACE (Deutsch, Fechter, Edmondson, McMullen)
IDNR (Fairfield)
IDOT (Hurley)

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APPENDIX C

Outgrant Agreement

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Illinois Department of Transportation

Office of Highways Project Implementation / Region 4 / District 6
126 East Ash Street / Springfield, Illinois 62704-4792

August 2, 2016

Alley Ringhausen, Executive Director
Great Rivers Land Trust
P.O. Box 821
Alton, Illinois 62002

LETTER OF INTENT

Dear Mr. Ringhausen:

This letter will document the intent of the Illinois Department of Transportation to acquire a minimum of 8.56 acres from the Great Rivers Land Trust for the US 54 – Champ Clark Bridge replacement project hereinafter described.

The Department will prepare the conveyance documents in accordance with 605 ILCS 5/4-508d and have them recorded in the Madison County Recorder's Office.

The Great Rivers Land Trust understands that the conveyance documents will include only property deemed necessary for satisfying the requirements of the United States Army Corp of Engineers (USACE) land exchange outgrant policy, as a result of impacts caused by the US 54 – Champs Clark Bridge project to USACE owned property. The Great Rivers Land Trust and the Department agrees that this property must continue to be preserved in its natural state; currently as forested floodplain wetland, after conveyance. The Department also intends to sign a perpetual conservation easement on the acquired property, and the easement will be held by Great Rivers Land Trust.

The Great Rivers Land Trust further understands that once this property is acquired in fee by the Department, the Department will proceed to transfer the title to the USACE per the land exchange outgrant policy.

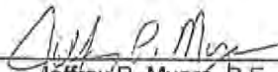
In order to document the Great Rivers Land Trust acceptance of the property transfer, we ask that the Great Rivers Land Trust Board of Trustees by Resolution, authorize you to sign the enclosed Letter of Intent. Please return the copy with your original signature, as well as a copy of the Great Rivers Land Trust Board of Trustees Resolution, in the enclosed, self-addressed stamped envelope.

Alley Ringhausen, Executive Director
August 2, 2016
Page 2

If you have any questions, please contact Jeff Myers at 217-782-7331.

Sincerely,


Jeffrey M. South, P.E.
Region Four Engineer

By: 
Jeffrey P. Myers, P.E.
Acting Program Development Engineer

Enclosures

Please indicate the appropriate response by placing a check in the box adjacent to one of the alternatives listed below:

- The Great Rivers Land Trust has reviewed the terms outlined in this Letter of Intent and requests the Department to proceed with the necessary work to acquire the property from the Great Rivers Land Trust.
- The Great Rivers Land Trust does NOT accept the terms outlined in this Letter of Intent and instructs the Department to take no further action.

Accepted: 
The Great Rivers Land Trust Date: 8/8/16

APPENDIX D

Section 4(f) Public Lands *De minimis* Impact Determination

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Missouri Department of Transportation
Patrick K. McKenna, Director

105 West Capitol Avenue
P.O. Box 270
Jefferson City, Missouri 65102

573.751.2551
Fax: 573.751.6555
1.888.ASK MODOT (275.6636)

SECTION 4(f) *DE MINIMIS* IMPACT DETERMINATION

TO: Kevin Ward
Division Administrator
Federal Highway Administration

FROM: Jo Ann Dent
Senior Environmental Specialist

SUBJECT: U.S. Route 54 Mississippi River Bridge
Louisiana, Missouri and Pike County, Illinois
MoDOT Job No. J3P2209 and IDOT Job No. D-96-165-10
U.S. Army Corps of Engineers – Two Rivers Recreation Area
Section 4(f) *De minimis* Impact Determination

This regards the replacement of the U.S. Route 54 Mississippi River Bridge with a new two-lane bridge approximately 50 feet south of the existing bridge. The new bridge will likely terminate west of the Sny Levee in Pike County, Illinois. This alternative will realign a portion of Route 54 approximately 65 feet south of the existing alignment and terminate before Wehrman Street in Louisiana, Missouri. The eastern terminus of the project is Township Road 400 in Illinois. The Selected Alternative will result in the removal of the existing historic bridge after the new structure is built.

On the Illinois side of the river, the U.S. Army Corps of Engineers (USACE) owns land on both sides adjacent to the existing alignment. Their Two Rivers Recreation Area, which includes the Two Rivers Marina, is a Section 4(f) protected resource located north of existing Route 54. It consists of two boat ramps, a parking lot, and a closed commercial building.

The Selected Alternative will require only temporary easement on the marina and have no impact on the boat ramp. Permanent impacts to Two Rivers Recreation Area will occur at the entrance to the marina. The proposed improved Route 54 roadway is designed for construction eight to ten feet above the existing roadway making it necessary to modify the entrance to maintain access to Two Rivers Marina. The area of the current entrance is approximately 0.07 acre. The EA indicated the new entrance would be widened on either side of the existing entrance approximately 0.16 acre. However, since the EA was approved, this amount has been reduced to 0.12 acre. The area of the new completed entrance will now total approximately 0.19 acre rather than 0.23 acre as was originally designed.

Once tied into Route 54, the entrance will be repaved. The new paved entrance will be designed to accommodate vehicles pulling large trailers to facilitate turning movements. Auxiliary lanes such as a right lane and a center left turn lane are proposed to enhance safety for users as they enter the marina.

MoDOT will construct a temporary entrance to the marina to provide continuous access during construction. This entrance approximately 140 feet east of the existing entrance will use 0.17 acre of adjacent USACE land that does not contain recreational uses. The temporary entrance will include a 20-foot wide, 270-foot long aggregate drive that could be constructed in one day. MoDOT will ensure that upon completion of the Two Rivers Marina permanent entrance, the temporary entrance will be re-graded to pre-existing conditions to match the surrounding area.

Only a 0.91-acre temporary construction easement will be required to access and construct both the permanent and temporary entrances.

FHWA has determined that potential impacts to Two Rivers Recreation Area, including Two Rivers Marina, are *de minimis* in that the proposed construction and completed project will not adversely impact the activities, features, and attributes of the facility that qualifies the property for Section 4(f) protection. To make the Section 4(f) *de minimis* finding, written concurrence is required from the USACE as the officials with jurisdiction (OWJ).

On December 22, 2015, letters were submitted to the USACE and to the management of Two Rivers Marina requesting concurrence with FHWA's *de minimis* finding. On April 16, 2016, the USACE emailed MoDOT requesting public hearing comments for consideration prior to signing the letter. The public hearing had not yet been held at this time; however, MoDOT agreed to provide the comments to the USACE after the public hearing had been conducted.

On April 21, 2016, a project meeting was held at the USACE Rivers Project Office where the Section 4(f) impacts were discussed. The meeting included representatives from the USACE, IDOT, MoDOT, and Two Rivers Marina.

Subsequent to this meeting, MoDOT received a letter from the USACE St. Louis District dated August 26, 2016. This letter indicated the agency had reviewed MoDOT's December 22, 2015, letter requesting USACE's concurrence with the Section 4(f) *de minimis* determination of Two Rivers Recreation Area, as well as listing the topics discussed in the April 21 2016, meeting. Conclusions from that meeting included the following:

1. Specifications will be added to the construction contract to make the entrance at minimum 30 feet in width and have the ability to accommodate tractor trailers and large boat trailers, which will be using the boat ramp facilities.
2. Staging areas used during construction shall have 4 inches of CA6 or asphalt placed upon completion of use as a staging area.
3. A 4:1 slope will be constructed on the sides of the newly constructed entrance to accommodate a riding lawn mower.
4. Access to Two Rivers Marina, including all existing boat ramps, is not compromised during the construction phase.
5. Grading of the parking lot will allow for runoff water to slope away from the marina.

The letter further states that the USACE had met with the marina lessee and after evaluating options for the entrance road, the USACE recommendation is to align the permanent entryway non-perpendicular to Route 54 to reduce potential impacts to Two Rivers Recreation Area, including Two Rivers Marina, from proposed construction and the completed project. This would reduce the potential for the project to adversely affect the day-to-day operations of the facility. Further, the USACE requested clarification and assurance that the above topics be considered as part of the *de minimis* finding and requested a more detailed design drawing.

In an email on August 2, 2016, MoDOT submitted all public comments to the USACE from the public hearing that was held on June 9, 2016. No comments were received regarding impacts to Two Rivers Recreation Area and Two Rivers Marina.

Based upon additional conversations with MoDOT's project manager, the management of Two Rivers Marina expressed concerns regarding the possible closure of the existing entrance during construction. The USACE and Two Rivers Marina management also expressed concerns regarding the final construction plans for the permanent entrance. As a result of these concerns, on September 16, 2016, MoDOT's project manager met with representatives of the USACE and Two Rivers Marina. Based on this meeting, MoDOT

agreed to the specific conditions requested by the USACE outlined in the agency's August 26, 2016, letter discussed above.

On September 19, 2016, MoDOT submitted a final letter to the USACE committing MoDOT to the following conditions:

1. The new marina entrance shall be constructed at a minimum width of 30 feet to accommodate tractor trailers and large boat trailers.
2. Any contractor staging area on U.S. Army Corps of Engineers property shall be restored to its original condition once the property is no longer needed.
3. The new marina entrance shall be constructed with minimum 4:1 side slopes to facilitate future maintenance.
4. MoDOT and the contractor shall provide continuous access to U.S. Army Corps of Engineers property throughout the life of the project.
5. Any grading of the Two Rivers Recreation Area and Two Rivers Marina parking areas will allow for runoff water to slope away from the marina.
6. Prior to construction, MoDOT will provide the plans for the marina entrance design to the U.S. Army Corps of Engineers and Two Rivers Marina for review.

The above conditions have been added as commitments in the Finding of No Significant Impact.

On September 21, 2016, the USACE submitted the signed Section 4(f) concurrence letter to MoDOT, concurring with FHWA's *de minimis* determination.

Under Section 4(f) of the U.S. Department of Transportation Act of 1966, Two Rivers Recreation Area, including Two Rivers Marina, is a Section 4(f) resource. Impacts to Two Rivers Recreation Area are *de minimis* in that the proposed construction and completed project will not adversely impact the activities, features, and attributes of the site that qualify it for protection under section 4(f).

Included with this determination is the Section 4(f) concurrence letter signed by the USACE, email correspondence between the USACE and MoDOT, USACE's letter of August 26, 2016, and MoDOT's design drawings for the proposed temporary and permanent entrances for Two Rivers Recreation Area.

MoDOT respectfully requests FHWA's concurrence with the Section 4(f) *de minimis* impact determination.



105 West Capitol Avenue
P.O. Box 270
Jefferson City, Missouri 65102

Missouri Department of Transportation
Patrick K. McKenna, Director

1.888.ASK MODOT (275.6636)

September 19, 2016

Ms. Kimberly Rea, CPRP
Recreation Manager
U.S. Army Corps of Engineers
Rivers Project Office
301 Riverlands Way
West Alton, MO 63386

RE: U.S. Route 54 Mississippi River Bridge Replacement
Louisiana, Missouri and Pike County, Illinois
Request for Concurrence on De Minimis Impact to Section 4(f) Protected Resource

Dear Ms. Rea,

Information was submitted to the U.S. Army Corps of Engineers St. Louis District Office in December 2015 regarding potential impacts to Two Rivers Recreation Area, including Two Rivers Marina, as a result of the proposed replacement of the Route 54 Mississippi River Bridge (Champ Clark Bridge) located in Louisiana, Missouri, and Pike County, Illinois. Under Section 4(f) of the U.S. Department of Transportation Act of 1966, Two Rivers Recreation Area, a property owned by the U.S. Army Corps of Engineers, is considered a Section 4(f) resource.

The Federal Highway Administration (FHWA) has determined that project impacts to Two Rivers Recreation Area, including Two Rivers Marina, are de minimis in that the project would not adversely impact the activities, features, and attributes that qualify the site for protection under Section 4(f). In order to make the Section 4(f) de minimis finding, U.S. Army Corps of Engineers' written concurrence as the official with jurisdiction is required.

As a result of the bridge construction, improvements to Route 54 are also necessary. Route 54 will be constructed higher than the existing roadway making it necessary to modify the marina entrance to maintain access to the marina. Once tied into Route 54, the marina entrance would be repaved. The new paved entrance would be designed to accommodate vehicles pulling large trailers to facilitate turning movements. Auxiliary lanes such as a right lane and a center left turn lane are proposed to enhance safety for users as they enter the marina.

A temporary entrance to Two Rivers Marina is also planned for providing continuous access into the marina so that a temporary closure would not be necessary. MoDOT would coordinate construction of the temporary entrance with Two Rivers Marina staff and would notify the public through a press release and signage at the marina entrance. Upon completion of the permanent entrance, the temporary entrance would be re-graded to pre-existing conditions to match the surrounding area.

Because of concerns expressed regarding the final construction plans for the permanent entrance into the marina, on September 16, 2016, U.S. Army Corps of Engineers staff and the Manager of Two Rivers Marina met with Keith Killen, MoDOT's project manager for this project. As a result of the meeting, MoDOT commits to the following:

1. The new marina entrance shall be constructed at a minimum width of 30 feet to accommodate tractor trailers and large boat trailers.



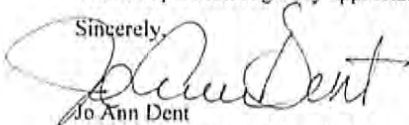
Our mission is to provide a world-class transportation experience that delights our customers and promotes a prosperous Missouri.
www.modot.org

2. Any contractor staging area on U.S. Army Corps of Engineers property shall be restored to its original condition once the property is no longer needed.
3. The new marina entrance shall be constructed with minimum 4:1 side slopes to facilitate future maintenance.
4. MoDOT and the contractor shall provide continuous access to U.S. Army Corps of Engineers property throughout the life of the project.
5. Any grading of the Two Rivers Recreation Area and Two Rivers Marina parking areas will allow for runoff water to slope away from the marina.
6. Prior to construction, MoDOT will provide the plans for the marina entrance design to the U.S. Army Corps of Engineers and Two Rivers Marina for review.

At your earliest convenience, please sign below indicating the U.S. Army Corps of Engineers' concurrence with FHWA's de minimis determination, and email this letter to me. Please mail an originally-signed letter to my attention at the physical address below.

If you have any questions, please contact me at 573/526-6680, or by email at jvann.dent@modot.mo.gov. Your cooperation is greatly appreciated.

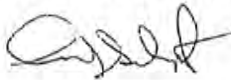
Sincerely,



Jo Ann Dent
Senior Environmental Specialist
Missouri Department of Transportation
601 W. Main Street, PO Box 270
Jefferson City, MO 65102

DE MINIMIS CONCURRENCE

As the official with jurisdiction over Two Rivers Recreation Area, the U.S. Army Corps of Engineers concurs with FHWA's determination that impacts to Two Rivers Recreation Area, including Two Rivers Marina, are de minimis in that the proposed construction and completed project will not adversely impact the activities, features, and attributes of the site that qualify it for protection under Section 4(f).



Digitally signed by SCHIMPF, ANDREW, C. 1231276765
DN: c=US, o=U.S. Government, ou=DoD, ou=PR,
ou=USA, cn=SCHIMPF, ANDREW, C. 1231276765
Date: 2016.09.21 10:37:47 -05'00'

Name and Title
U.S. Army Corps of Engineers

Date

Cc: Katy Feechter, U.S. Army Corps of Engineers, Rivers Project Office
Chris Hopfinger, U.S. Army Corps of Engineers, St. Louis District
Lynn Hoerner, U.S. Army Corps of Engineers, St. Louis District
Jaime Aslen, Two Rivers Marina
Raegan Ball, Federal Highway Administration, Missouri Division
Janis Piland, Federal Highway Administration, Illinois Division
Dennis O'Connell, Illinois Department of Transportation
Gayle Unruh, Missouri Department of Transportation
Keith Killen, Missouri Department of Transportation

Jo A. Dent

From: Jo A. Dent
Sent: Tuesday, August 02, 2016 1:07 PM
To: 'Kennedy, Timothy A @MVS'
Cc: Gayle Unruh; Keith A. Killen
Subject: RE: U.S. Route 54 Mississippi River Bridge Replacement (UNCLASSIFIED) - Section 4(f) de minimis determination
Attachments: Public Hearing Comments.pdf; Two Rivers Recreation Area Boundaries-.pdf; Two Rivers Marina Entrance.pdf; Two Rivers temporary entrance.pdf

Tracking:	Recipient	Delivery
	'Kennedy, Timothy A @MVS'	
	Gayle Unruh	Delivered: 8/2/2016 1:07 PM
	Keith A. Killen	Delivered: 8/2/2016 1:07 PM

Good afternoon, Tim.

This regards project impacts to the U.S. Army Corps of Engineers'-owned Two Rivers Recreation Area, including the Two Rivers Marina, which are Section 4(f) resources under Section 4(f) of the U.S. Department of Transportation Act of 1966.

As you requested in your email below, attached are the comments that were received as a result of the public hearing held June 9, 2016, at the Twin Pikes YMCA, in Louisiana, Missouri. There were no comments received regarding impacts to Two Rivers Recreation Area and Two Rivers Marina. I've also included three attachments from previous emails that may further assist you.

FHWA requested written concurrence from the USACE and the manager of Two Rivers Marina with its de minimis determination in that the project will not adversely impact the activities, features, and attributes of Two Rivers Recreation Area and Two Rivers Marina that qualify them for protection under Section 4(f).

Please let me know if you need more information or if you have questions.

Thank you for your assistance!

Jo

Jo Ann Dent
Senior Environmental Specialist
MODOT – Design
601 West Main Street, PO Box 270
Jefferson City, MO 65102
573/526-6680

From: Jo A. Dent
Sent: Monday, April 11, 2016 1:27 PM
To: Kennedy, Timothy A @MVS
Subject: RE: U.S. Route 54 Mississippi River Bridge Replacement (UNCLASSIFIED)

Hello Tim. No, we've not yet held the public meeting, but anticipate holding it soon. We haven't actually scheduled it, but it will be soon. I will provide any comments to you that we receive from the meeting. Let me know if you need anything further.

Thank you!

Jo

Jo Ann Dent
Senior Environmental Specialist
MODOT – Design
601 West Main Street, PO Box 270
Jefferson City, MO 65102
573/526-6680

-----Original Message-----

From: Kennedy, Timothy A @MVS [<mailto:Timothy.A.Kennedy@usace.army.mil>]
Sent: Monday, April 11, 2016 1:00 PM
To: Jo A. Dent
Subject: FW: U.S. Route 54 Mississippi River Bridge Replacement (UNCLASSIFIED)

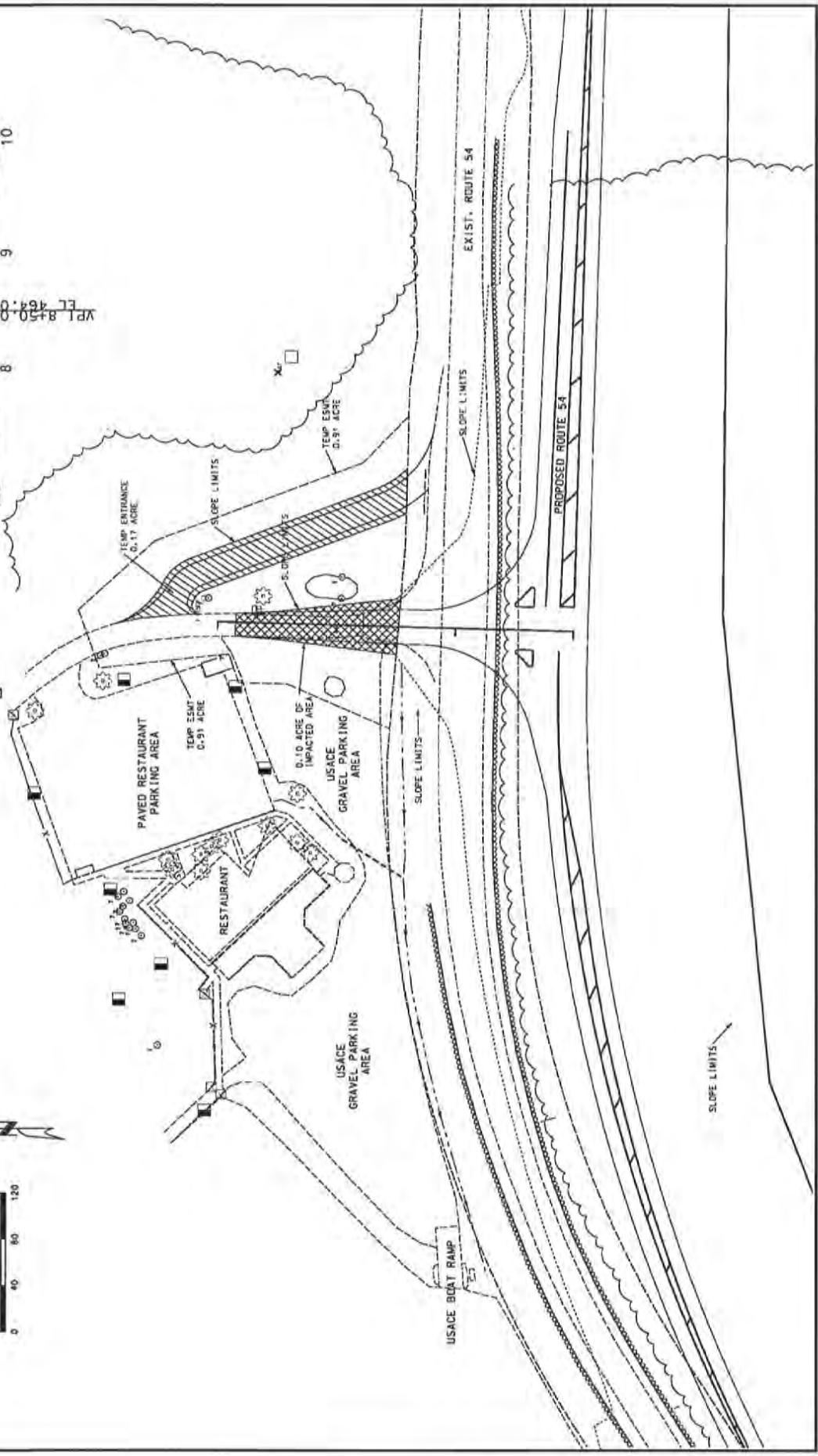
JoAnn,

I am picking up where Lynn left off. Did you have a public meeting in February? If so, can you send those comments to me? USACE has a few comments we are consolidating before sending to you and it would be nice to be able to see what concerns the public may have. Thanks!

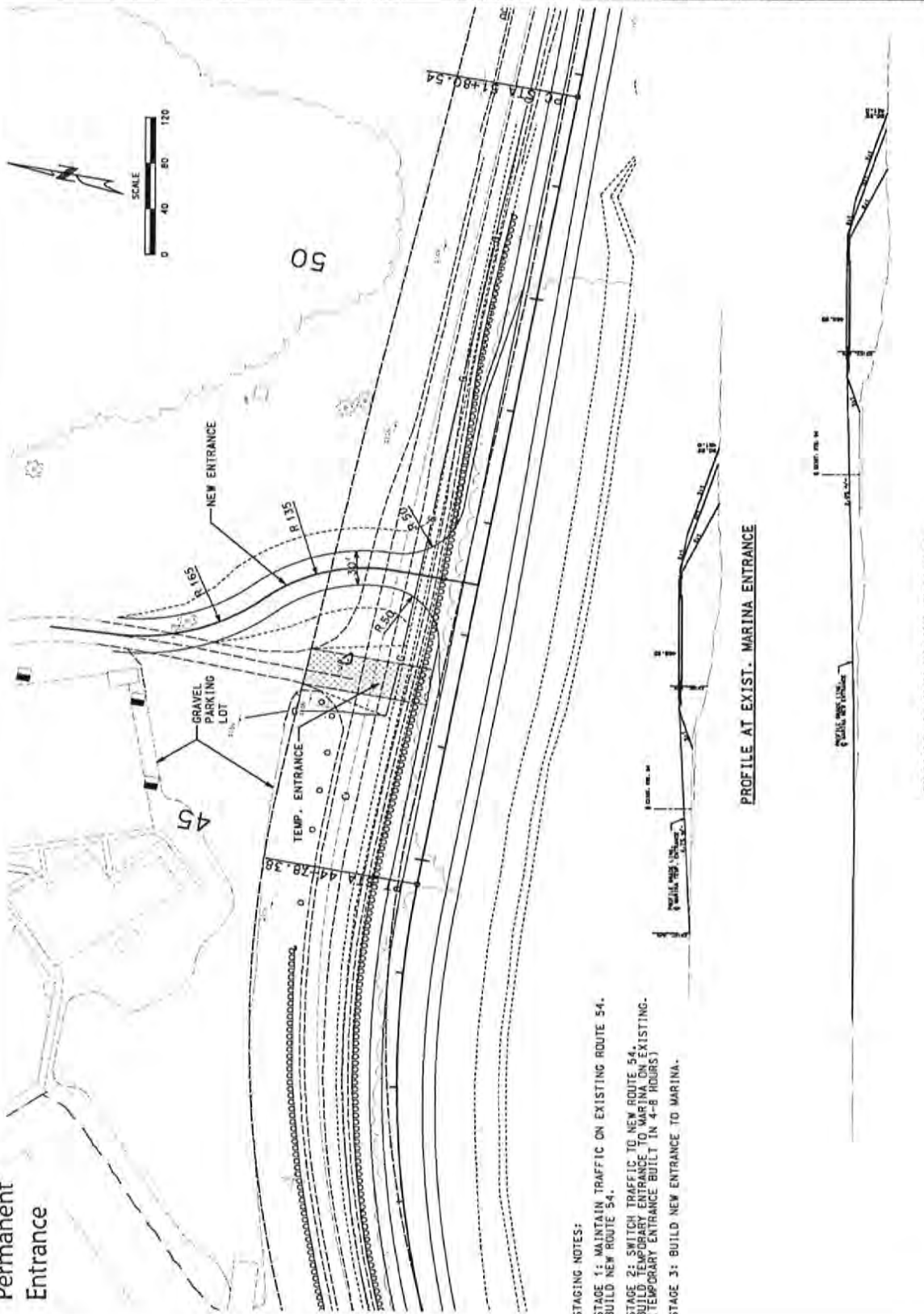
Tim Kennedy
US Army Corps of Engineers
1222 Spruce Street
St. Louis, MO 63103
Ph 314-331-8180
Fx 314-331-8740
timothy.a.kennedy@usace.army.mil

Temporary Entrance

TWO RIVERS MARINA



Permanent Entrance



STAGING NOTES:
 STAGE 1: MAINTAIN TRAFFIC ON EXISTING ROUTE 54.
 BUILD NEW ROUTE 54.
 STAGE 2: SWITCH TRAFFIC TO NEW ROUTE 54.
 BUILD TEMPORARY ENTRANCE TO MARINA (ON EXISTING).
 (TEMPORARY ENTRANCE BUILT IN 4-8 HOURS)
 STAGE 3: BUILD NEW ENTRANCE TO MARINA.

PROFILE AT EXIST. MARINA ENTRANCE

PROFILE AT NEW MARINA ENTRANCE

SPECIAL SHEET
 MARINA ENTRANCE MODIFICATIONS

DATE	DESCRIPTION

MISSOURI HIGHWAYS AND TRANSPORTATION COMMISSION
 105 WEST CAPITOL
 JEFFERSON CITY, MO 65102
 1-888-636-MODOT (1-888-378-6363)

MDOT
 MISSOURI DEPARTMENT OF TRANSPORTATION

105 WEST CAPITOL
 JEFFERSON CITY, MO 65102
 1-888-636-MODOT (1-888-378-6363)

Burns & McDonnell | Engineering Co., Inc.
 3400 Bond Parkway
 Kansas City, Missouri 64114
 816-235-9400
 Office of Authority
 No. 1 000185
 BMD Project No. 9197

DATE	DESCRIPTION

STATE: MO
 COUNTY: PIKE
 PROJECT NO.: J492209B
 SHEET NO.: 1
 DATE: 8/1/2018

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APPENDIX E

Programmatic Section 4(f) Evaluation and Approval
for FHWA Projects that Necessitate the
Use of Historic Bridges for FHWA

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PROGRAMMATIC SECTION 4(f) EVALUATION

HISTORIC BRIDGES

PROJECT NUMBER: MoDOT Job No. J3P2209, IDOT Sequence No. 17263

RTE: 54 COUNTY: Pike County, Missouri & Pike County, Illinois

SECTION 4(f) RESOURCE: Champ Clark Bridge, K0932

REVIEWED BY: Michael Meinkoth ^{ncm} TITLE: Historic Preservation Manager

APPROVED BY:  DATE: 10/20/16

This project and its impacts have been determined to meet the following criteria for a Programmatic Section 4(f). Sufficient documentation exists in the project file to support this determination. Note: Any response in a bracket requires additional information prior to approval. Consult Programmatic 4(f) Evaluation signed July 5, 1983 by FHWA's Office of Environmental Policy.

APPLICABILITY

	Yes	No
1. Will the bridge be replaced or rehabilitated with Federal funds?	<u>X</u>	[]
2. Will the project require the "use" of an historic bridge which is on or eligible for listing on the National Register of Historic Places?	<u>X</u>	[]
3. Will the project impair the historic integrity of the bridge either by demolition or rehabilitation?	<u>X</u>	[]
4. Has the bridge been determined to be a National Historic Landmark?	[]	<u>X</u>

ALTERNATIVES CONSIDERED

1. The do nothing alternative has been studied and is considered not to be feasible and prudent for reasons of maintenance and safety.	<u>X</u>	[]
--	----------	-----

- | | Yes | No |
|--|-----|-----|
| 2. The building on new location alternative without using the old bridge has been studied and has been determined to be not feasible and prudent for reasons of terrain; and/or adverse social, economic or environmental effects; and/or engineering and economy. | _X_ | [] |
| 3. Rehabilitation of the existing bridge without affecting the historic integrity of the bridge has been studied and has been determined to be not feasible and prudent for reasons of structural deficiency and/or geometrics. | _X_ | [] |
| 4. Relocation of the existing bridge has been studied and found to be not feasible and prudent because either the bridge's historic integrity would be adversely affected or no responsible party could be found to accept responsibility for the bridge. | _X_ | [] |

MEASURES TO MINIMIZE HARM

- | | | |
|---|-------|-----|
| 1. For bridges that are to be rehabilitated, the historic integrity of the bridge is preserved, to the greatest extent possible, consistent with unavoidable transportation needs, safety, and load requirements. | _n/a_ | [] |
| 2. For bridges that are to be rehabilitated to the point that the historic integrity is affected or that are to be moved or demolished, the FHWA has ensured that fully adequate records are made of the bridge in accordance with the Historic American Engineering Record (HAER) standards, or other suitable means developed through consultation. | _n/a_ | [] |
| 3. For bridges that are to be replaced, the existing bridge is made available for an alternative use, provided a responsible party agrees to maintain and preserve the bridge. | _X_ | [] |
| 4. For bridges that are adversely affected the FHWA, SHPO, and ACHP have reached agreement through the Section 106 process on Measures to Minimize Harm and those measures are incorporated in the project. | _X_ | [] |

Section 4(f) Narrative
Champ Clark Bridge (K0932)

Applicability

The Missouri Department of Transportation (MoDOT) and the Illinois Department of Transportation (IDOT) are anticipating that federal funding from the Federal Highway Administration (FHWA) as well as permits from the U. S. Army Corps of Engineers will be required to construct a new bridge on Route 54 over the Mississippi River at Louisiana, Pike County, Missouri to Pike County, Illinois. As part of the project, the Champ Clark Bridge (K0932) will be replaced with a new vehicular bridge and will be removed.

The Champ Clark Bridge (K0932) is eligible for listing on the National Register of Historic Places (NRHP) for significance in engineering, transportation and commerce. The bridge is an outstanding example of a large scale highway truss construction. The bridge is a vital connection in a major transcontinental highway connecting Chicago with the American southwest. The bridge was funded by the local business community, who saw opportunities to draw traffic, and therefore customers, away from the St. Louis area.

The removal of the Champ Clark Bridge (K0932) will have an adverse effect on the historic bridge. The Missouri SHPO concurred with this finding on October 4, 2014.

The Champ Clark Bridge (K0932) is not a National Historic Landmark.

Alternatives Considered

During the Environmental Assessment (EA) conducted studying alternatives for the Mississippi River crossing, alternatives that would not remove the Champ Clark Bridge (K0932) were included. Details of the purpose and need for the project and the alternatives studied can be found in the Purpose & Need and the Alternatives chapters of the EA.

The No Build (or do nothing) alternative would retain the historic bridge and perform routine maintenance but would not include substantial rehabilitation. The do nothing alternative did not meet the purpose and need of the project because it does not correct deficiencies in lane and shoulder width or vertical clearance, it would not eliminate flooding on the Illinois approach to the bridge or correct deficiencies in the Sny Levy, nor would it address problems with the Highway 54/Highway 79 intersection. It is estimated that the do nothing alternative would only result in an estimated seven years of service life for the bridge. Because the do nothing alternative does not meet the purpose and need for the project and does not result in the preservation of the bridge, it is not a reasonable and prudent alternative.

Several alignments were studied that would not require removal of the Champ Clark Bridge (K0932). The far upstream and far downstream options were dropped from the initial range of alternatives because they would have substantial impacts on the floodplain in Illinois, would require construction of a new highway around Louisiana and would therefore have substantially higher right-of-way and construction costs.

The adjacent upstream, adjacent upstream with improved alignment and adjacent downstream alternatives were carried forward from the initial range of alternatives in the EA. All meet the purpose and need of the project. Both upstream alternatives would impact the River's Edge Motel, a property eligible for listing on the NRHP. The downstream alternative has fewer overall impacts on cultural resources. All three options call for the removal of the Champ Clark Bridge (K0932) because it does not have the vertical clearances or the width to meet current standards. Retaining the Champ Clark Bridge (K0932) for vehicular use with these alternatives is not reasonable and prudent.

The rehabilitation alternative was also studied in the EA. The rehabilitation alternative anticipated work similar to that which was done in 1983, 1999 and 2005. The rehabilitation alternative would retain the historic Champ Clark Bridge (K0932). It would not meet the purpose and need of the project because it does not correct deficiencies in lane and shoulder width or vertical clearance, it would not eliminate flooding on the Illinois approach to the bridge or correct deficiencies in the Sny Levy, nor would it address problems with the Highway 54/Highway 79 intersection. It is anticipated that rehabilitation costs would climb over time and the bridge would need additional rehabilitations in the future, requiring additional expense and causing additional lane closures and bridge closures impacting the traveling public.

The Champ Clark Bridge is currently being made available for reuse by another party (for a period between July 1, 2015 and December 31, 2016). Proposals can be made for reuse of the bridge, in its entirety, in place, reuse of the entire bridge in another location or reuse of any portion of the bridge. Although the advertisement period has not yet ended, the MoDOT has previously advertised a number of major river bridges and has not received a viable proposal for reuse of more than a small portion of a bridge, which would result in an adverse effect on the bridge. Although hopeful that a proposal for the Champ Clark Bridge will be put forward, MoDOT does not realistically believe that such a proposal will come forward. There has been no support for preserving the historic span generated locally.

Measures to Minimize Harm

The FHWA has consulted with the Missouri and Illinois SHPO, the IDOT and MoDOT, and various consulting parties through the Section 106 process to resolve adverse effects on the historic Champ Clark Bridge (K0932).

Through the Section 106 consultation process a documentation standard for the Champ Clark Bridge (K0932) has been agreed to among all the parties. Prior to the letting of the construction project, the MoDOT will record the Champ Clark Bridge through archival photographs taken to Missouri Bridge Documentation Standard I (photographs taken and printed to National Register standards), and a historical narrative explaining the history and significance of the bridge will be prepared. Copies of the bridge plans, including rehabilitation will be provided as will a reader friendly bridge description.

The bridge will be marketed following the guidelines of the *Missouri Historic Bridge Relocation Plan*, including advertising the bridge through MoDOT's *Free Bridges* web-site, direct

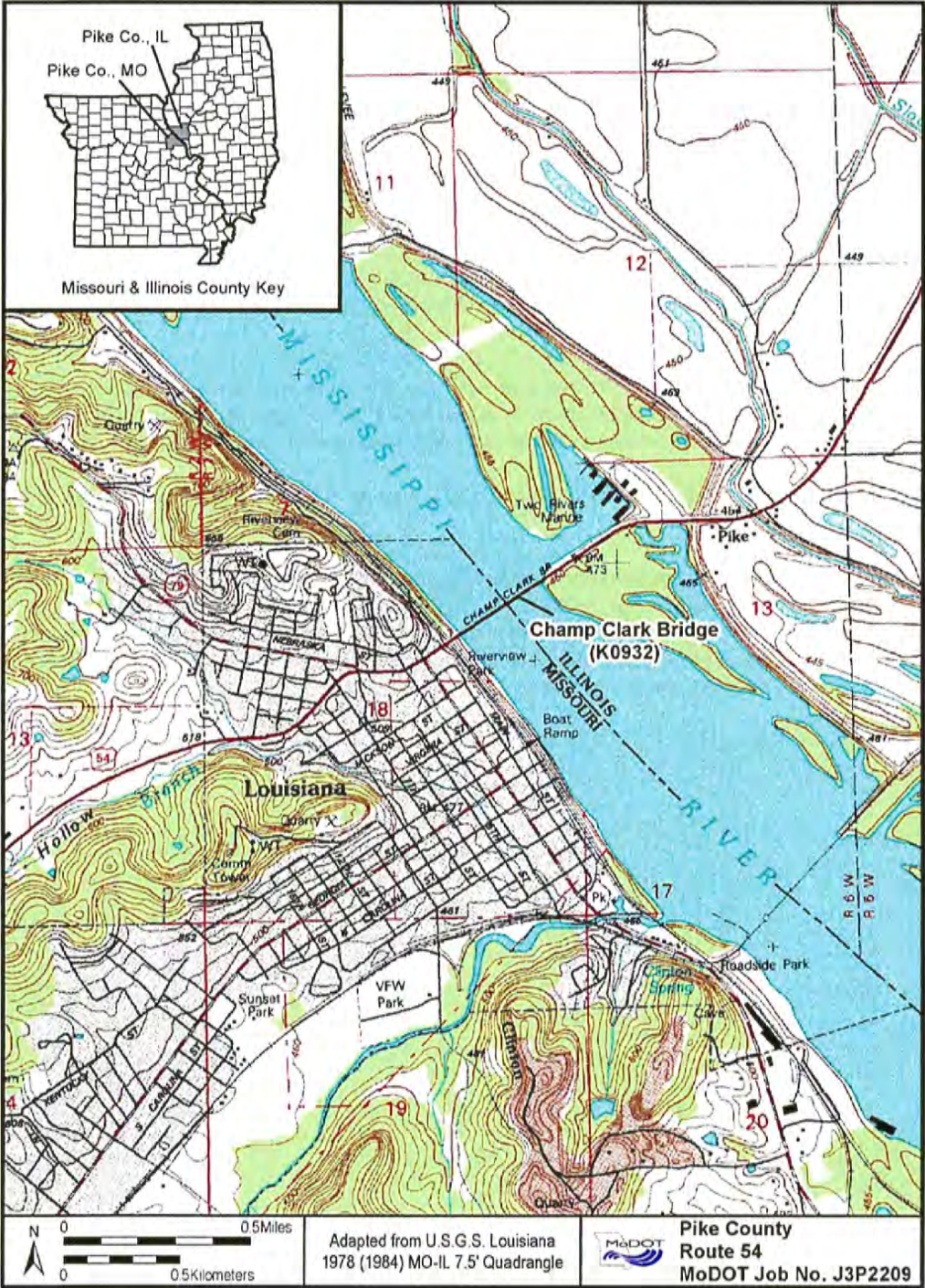
marketing to local governmental agencies, historical societies, preservation organization and trail groups, and publishing press releases announcing the availability of the bridge. The bridge will be available for a minimum of eighteen (18) months between July 1, 2015 and December 31, 2016. If proposals for the reuse of the bridge are received (either for reuse in place or relocation of any part of the bridge), the proposals will be reviewed by the FHWA, MoDOT, IDOT, and the Missouri and Illinois SHPO to determine if it is viable and ensures long term preservation of the bridge. If no proposals are received, elements of the bridge will be salvaged, including the bridge plaques which will be donated to the City of Louisiana and an appropriate group in Pike County, Illinois, and sufficient material to create the base of an interpretive panel.

MoDOT will prepare a documentary type video on the history and engineering of the bridge explaining the significance of the bridge. The video will be provided to local repositories as well as the Missouri and Illinois SHPO and IDOT.

An interpretive panel on the history and engineering of the bridge will be installed at the Riverview Park in Louisiana. A brochure on Mississippi River Bridges in Missouri will be prepared by MoDOT. The brochure shall be made available to visitors centers for distribution.

MoDOT shall pursue the feasibility of 3D (LIDAR) imaging of the bridge to be used to aid in interpretation of the bridge.

The Section 106 process has been resolved through the consultation process and the preparation of a Memorandum of Agreement (MOA) between the FHWA, the Missouri and Illinois SHPO, IDOT and MoDOT. The MOA contains stipulations for marketing, documenting and interpreting the Champ Clark Bridge (K0932) and for archaeological studies yet to be conducted in Illinois and Missouri. The MOA was executed by FHWA on January 4, 2016.



Missouri & Illinois County Key

Adapted from U.S.G.S. Louisiana
1978 (1984) MO-IL 7.5' Quadrangle



Pike County
Route 54
MoDOT Job No. J3P2209



Bridge K0932, facing northeast



Bridge K0932, facing east



Bridge K0932, facing southeast

Pike County
Route 54
MoDOT Job No. J3P2209

