

IMPROVEMENTS ON I-270 FROM CHAIN OF ROCKS CANAL TO I-255

MADISON COUNTY, ILLINOIS

DRAFT SECTION 4(f) EVALUATION
Submitted Pursuant to 49 USC 303
by the

U.S. Department of Transportation
Federal Highway Administration

and

Illinois Department of Transportation

Date of Approval

For FHWA

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ABSTRACT:

The proposed undertaking involves improvements along Interstate 270 (I-270) from Chain of Rocks Canal to Interstate 255 (I-255) in Madison County Illinois. While the project study area limits extend from Riverview Drive in Missouri to Illinois Route 157 (IL 157) in Illinois, the improvements from Riverview Drive in Missouri to Chain of Rocks canal will be addressed as part of the new Mississippi River bridge project. Based on the evaluation completed during the engineering analysis, no improvements are currently needed on I-270 from the I-255 interchange to IL 157 to meet the project purpose and need. Therefore, the termini for the proposed improvements will be from the Chain of Rocks Canal to the I-255 interchange in Madison County, Illinois.

I-270 will be widened to accommodate 3 lanes in each direction and 12-foot shoulders will be provided on both sides, with barrier wall down the median. Interchange improvements throughout the corridor include the conversion of the IL Route 3 interchange into a partial cloverleaf interchange, the conversion of the Illinois Route 111 (IL 111) interchange into a diverging diamond interchange and the Illinois Route 203 (IL 203) interchange will be reconstructed to improve the ramp configuration. A segment of Engineers Road that is located to the south of I-270 will be relocated to maintain roadway drainage.

As part of the proposed reconstruction of the interchange at IL 111, improvements are also proposed to Chain of Rocks Road, which is a section of Historic Route 66 that is considered eligible for the NRHP. Historic Route 66 from the Chain of Rocks Canal to IL 157 within the project area was deemed eligible for listing on the National Register of Historic Places under Criterion A as evaluated by the Federal Highway Administration (FHWA) and concurred upon by the Illinois State Historic Preservation Office (SHPO). Based on the proposed improvements, FHWA has determined and the SHPO has concurred, that an adverse effect to Historic Route 66 will occur. The ongoing Section 106 process will result in a Memorandum of Agreement (MOA) among the FHWA, the SHPO and the Illinois Department of Transportation (IDOT). The MOA will identify measures to mitigate harm to the Section 4(f) historic properties.

DRAFT

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1.0 Introduction

Section 4(f) of the U.S. Department of Transportation Act of 1966, known as Section 4(f), provides for consideration of park and recreation lands, wildlife and waterfowl refuges, and historic sites during transportation project development. The law, now codified in 49 U.S.C. §303 and 23 U.S.C. §138, applies only to agencies within the U.S. Department of Transportation (U.S. DOT) and is implemented by the Federal Highway Administration (FHWA) and the Federal Transit Administration through the regulation at 23 CFR Part 774. Before approving a project that uses Section 4(f) property, FHWA must determine that there is no feasible and prudent alternative that avoids the Section 4(f) properties and that the project includes all possible planning to minimize harm to the Section 4(f) properties; or, FHWA makes a finding that the project has a de minimis impact on the Section 4(f) property.

Section 4(f) protects publicly owned park and recreation areas that are open to the general public, publicly owned wildlife and waterfowl refuges, and public or privately owned historic sites. The term historic sites includes prehistoric and historic districts, sites, buildings, structures or objects listed in, or eligible for, the National Register of Historic Places (NRHP).

Like Section 4(f), Section 106 of the National Historic Preservation Act (NHPA) of 1966 also mandates consideration of a project's effect on historic sites. The most important connection between the two statutes is that the Section 106 process is generally the method by which historic properties are identified that would be subject to consideration under Section 4(f). The results of the identification step under Section 106 - including the eligibility of the resource for listing on the NRHP, the delineation of NRHP boundaries, and the identification of contributing and non-contributing elements within the boundary of a historic district—are a critical part of determining the applicability of Section 4(f).

The most important difference between the two statutes is the way each of them measures impacts to historic sites. Whereas Section 106 is concerned with adverse effects, Section 4(f) is concerned with use. The two terms are not interchangeable and an adverse effect determination under Section 106 does not automatically equate to a Section 4(f) use of the property.

Use of a Section 4(f) property occurs: (1) when land is permanently incorporated into a transportation project; (2) when there is a temporary occupancy of land that is adverse in terms of the statute's preservation purpose; or (3) when there is a constructive use (a project's proximity impacts are so severe that the protected activities, features, or attributes of a property are substantially impaired).

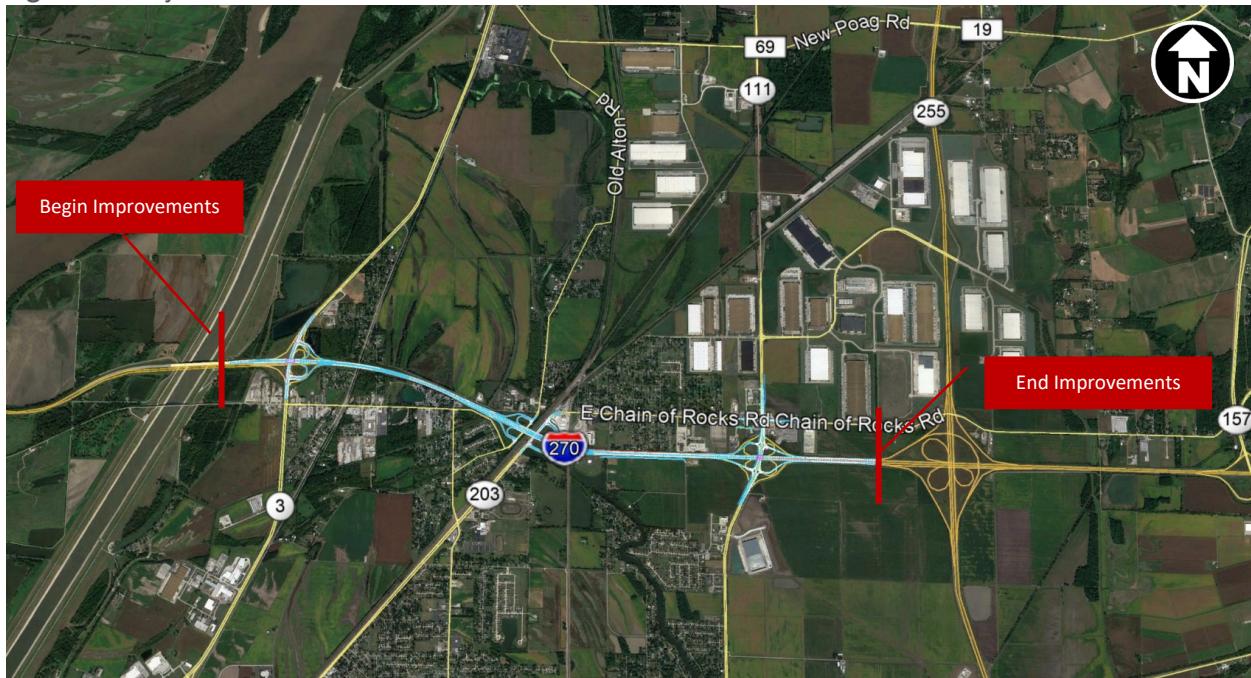
The Section 4(f) statute imposes conditions on the use of land from historic sites for highway projects but makes no mention of bridges, highways, or other types of facilities such as railroad stations or terminal buildings, which may be historic and are already serving as transportation facilities. The FHWA's interpretation is that the Congress clearly did not intend to restrict the rehabilitation or repair, of historic transportation facilities. The FHWA therefore established a regulatory provision that Section 4(f) approval is required only when a historic bridge, highway, railroad, or other transportation facility is adversely affected by the proposed project; e.g. the historic integrity (for which the facility was determined eligible for the NR) is adversely affected by the proposed project (See 23 CFR 774.13(a)).

2.0 Project Description

2.1 Proposed Action

The Illinois Department of Transportation (IDOT) and FHWA propose to proceed with a highway improvement project on Interstate 270 (I-270) in Madison County, Illinois. This project will include construction of additional travel lanes on I-270 from the Chain of Rocks canal to Interstate 255 (I-255). I-270 will be widened to accommodate 3 lanes in each direction and 12-foot shoulders will be provided on both sides, with barrier wall down the median. Interchange improvements throughout the corridor include the conversion of the Illinois Route 3 (IL 3) interchange into a partial cloverleaf interchange, the conversion of the Illinois Route 111 (IL 111) interchange into a diverging diamond interchange and the Illinois Route 203 (IL 203) interchange will be reconstructed to improve the ramp configuration. A segment of Engineers Road that is located to the south of I-270 will be relocated to maintain roadway drainage. The IL 111 and Chain of Rocks Road intersection will be reconstructed. Roundabout intersections will be constructed on Chain of Rocks Road. The west roundabout will be located at the existing Chain of Rocks Road and Bel Air Drive intersection. The east roundabout will be located near the existing truck entrance to the Flying J Travel Plaza.

Figure 1 - Project Area



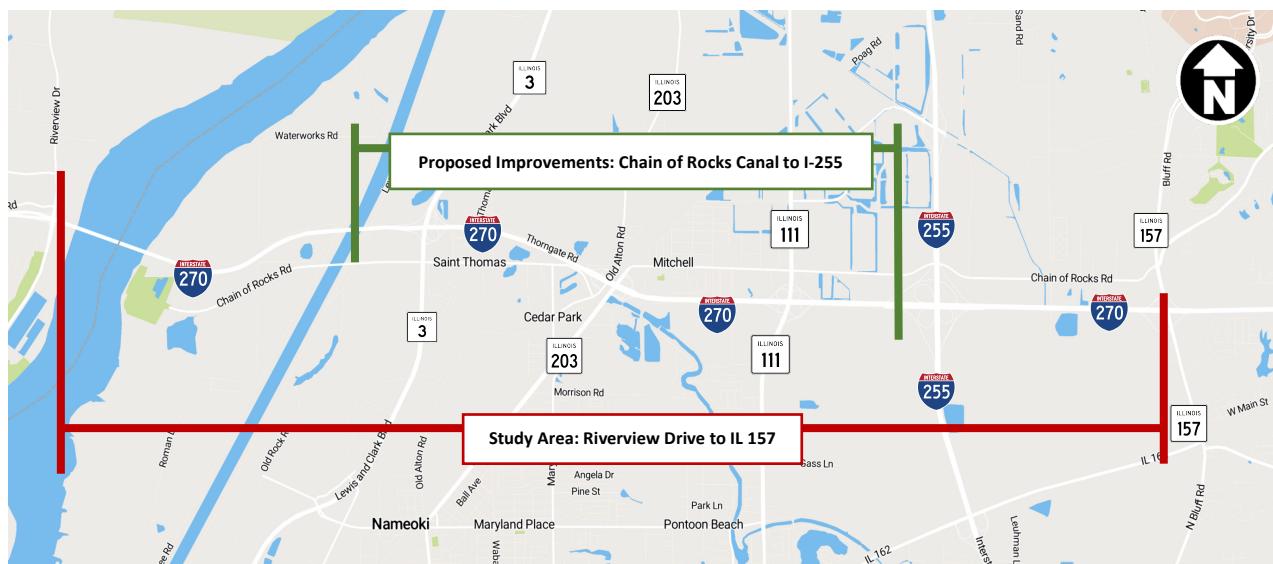
The IL 111 improvements will be completed in two separate construction projects. The first, referred to as the IL 111 Interim project, will include the reconstruction of the interchange to a Diverging Diamond Interchange (DDI) and the associated interstate ramps. The second, referred to as the Ultimate IL 111 project, will include the proposed improvements north of the interchange, specifically to Chain of Rocks Road, which is a segment of Historic Route 66.

2.2 Study Area

The study area is located primarily in the southwestern portion of Madison County and includes areas within the city limits of Granite City, Pontoon Beach, Mitchell and Glen Carbon and unincorporated areas of Madison County.

The project study area limits extend from Riverview Drive in Missouri to Illinois Route 157 (IL 157) in Illinois, which is approximately 10.9 miles along I-270. The improvements from Riverview Drive in Missouri to Chain of Rocks canal will be addressed as part of the new Mississippi River bridge project. Based on the evaluation completed during the engineering analysis, no improvements are currently needed on I-270 from the I-255 interchange to IL-157 to meet the project purpose and need. Therefore, the termini for the proposed improvements will be from the Chain of Rocks Canal to the I-255 interchange in Madison County, Illinois. Both the project study area evaluated during the engineering analysis and the limits of the proposed improvements are shown on Figure 2.

Figure 2: Study Area



3.0 Purpose and Need

3.1 Project Need

The need for proposed improvements to the I-270 corridor is based on existing geometric, safety and capacity deficiencies. A secondary project need to address connectivity for the existing and future economic development has also been identified. Additional project background related to the need elements is discussed in more detail below.

3.1.1 Capacity

According to the traffic data analysis completed as part of the preliminary engineering study, volumes for all roadways within the project limits are expected to increase between 30 to 35 percent by 2044. The existing I-270 interchanges have been evaluated for the increased traffic forecasted for 2044.

The interchanges and intersections in the project area were evaluated for capacity using Level of Service (LOS). LOS is based on a letter scale from A to F as a measure of available capacity of the roadway and existing demand. A LOS A indicates that a driver may maneuver on the roadway unimpeded by other drivers and with little delay. A LOS E indicates the uppermost operational limit of traffic, indicating that traffic is moving with little or no maneuverability, increased delay, and lower speeds. A LOS F indicates that the roadway is over capacity and is indicative of roadways that experience severe congestion and stopped or slow conditions. The IDOT Bureau of Design and Environment Manual indicates the acceptable LOS for I-270 is C or better.

According to the Highway Capacity Manual, an intersection is also considered to operate at an LOS F if one or more movements operate over capacity, which is characterized by more vehicles arriving at the intersection than can be served by a specific movement during the analysis period. This is commonly evaluated using the volume-to-capacity (v/c) ratio, which is the volume of cars actually on a roadway compared to the volume of cars a roadway is designed to hold. A v/c ratio greater than 1.0 is considered over capacity.

The Highway Capacity Manual (HCM) was used to determine the 2017 and 2044 LOS for the existing I-270 corridor. Table 1 summarizes the results of the LOS analysis by interchange area if no improvements to the corridor are made. For the design year of 2044, I-270 will operate at LOS E or F in both directions during both the morning and evening peak hours for the majority of the project corridor. Improvements along I-270 are needed to provide additional capacity.

Table 1: Levels of Service –I-270 Corridor (HCM)

Interchange	Current Year 2017		Design Year 2044 (No Build)	
	AM	PM	AM	PM
Eastbound I-270				
IL 3 interchange area	B	D	D	F
IL 203 interchange area	B	E	E	F
IL 111 interchange area	C	E	E	F
I-255 interchange area	A	B	C	F
IL 157 interchange area	A	B	C	F
Westbound I-270				
IL 157 interchange area	B	B	C	B
I-255 interchange area	C	B	F	F
IL 111 interchange area	D	C	F	F
IL 203 interchange area	E	C	F	F
IL 3 interchange area	D	C	D	D

Red values represent unacceptable congestion for level of service analysis

AM – Morning Peak Hour

PM – Afternoon Peak Hour

3.1.2 Safety

To evaluate the safety of the project study area, crash data reported from 2010-2015 for the Missouri side of the corridor, and from 2012-2016 for the Illinois side of the corridor was analyzed. The analysis identified 568 crashes along I-270 within the study area during the study period. The corridor crash rate is 62.3 per 100 million vehicles traveled. The 2014 Illinois statewide average crash rate for interstates is 36.5. Therefore, the project corridor crash rate is almost twice as high as the Illinois statewide average for interstates.

Based on the operational safety analysis completed for the project, the I-270 mainline, secondary roadways, and interchanges contain several safety deficiencies that may be contributing to the higher-than-average corridor crash rate. Deficient weaving lengths, substandard shoulder widths, substandard auxiliary lane lengths, and downstream traffic-capacity constraints may be contributing factors to the high crash rate. Proposed safety countermeasures from the Crash Analysis Report include:

- Increase the number of mainline lanes
- Increase shoulder width
- Increase length of acceleration/deceleration lanes
- Reconstruct IL 3 interchange and signalize ramp terminals
- Improve ramp geometrics at Old Alton Road and IL 203 interchanges
- Reconstruct IL 111 interchange and improve intersection geometrics to Chain of Rocks Road

3.1.3 Geometric Deficiencies

The geometric evaluation completed for the project identified that within the I-270 study limits, each interchange, the mainline interstate, and all ramps contain deficiencies. A deficiency is defined as an element or characteristic of a roadway that does not meet current FHWA or IDOT policies. For example, the existing interchanges do not meet policy for ramp design speed, ramp weaving distance, shoulder width, depressed median widths and collector-distributor design elements.

3.1.4 Connectivity to Support Economic Development

The Gateway Commerce Center, the largest warehouse complex in the Metro East and a major freight generator, covering 2,381 acres, is located adjacent to the IL 111 interchange. The center includes tenants such as Amazon, World Wide Technology and Dial. The nearby Lakeview Acres Park is a 727-acre industrial park located just north of the project area. Between Gateway Commerce Center and Lakeview Acres Park there are a total of 24 warehouse facilities. In addition to what currently exists, planned development is expected to bring 772 acres of new industrial and commercial development in the southeast quadrant of the IL 111 interchange. Supporting the traffic flow to and from this area is critical for the economic vitality of this area. Therefore, there is a need to provide roadway connectivity to I-270 between the rapidly expanding warehousing and industrial development in the area of the IL 111 interchange.

3.2 Project Purpose

The purpose of the proposed project is to improve safety, address geometric deficiencies, reduce congestion, and improve system operational efficiency within the I-270 corridor between Riverview Drive and IL 157. The project also has a secondary purpose to provide connectivity in support of economic development.

4.0 Description of Section 4(f) Properties

As noted in Section 1.0, Section 4(f) properties include publicly owned park and recreational areas; public wildlife and waterfowl refuges of national, state, or local significance; or historic sites of national, state, or local significance, whether publicly or privately owned.

Wildlife and waterfowl refuges are defined as properties that are part of the National Wildlife Refuge or other publicly owned land that serve as locations for land conservation or management of endangered species, wildlife and waterfowl resources and their habitats. The U.S. Fish and Wildlife Service (USFWS) is the government agency dedicated to the conservation, protection and enhancement of fish, wildlife and plants and their habitats, and oversees the National Wildlife Refuge System. According to the USFWS database, there are no National Wildlife Refuges present within or nearby the project study area.

Historic properties are the only Section 4(f) properties identified within the proposed project area. Under Section 4(f), a significant historic site is defined as on, or eligible for listing in the National Register of Historic Places (NRHP) and include the following within the Area of Potential Effect (APE):

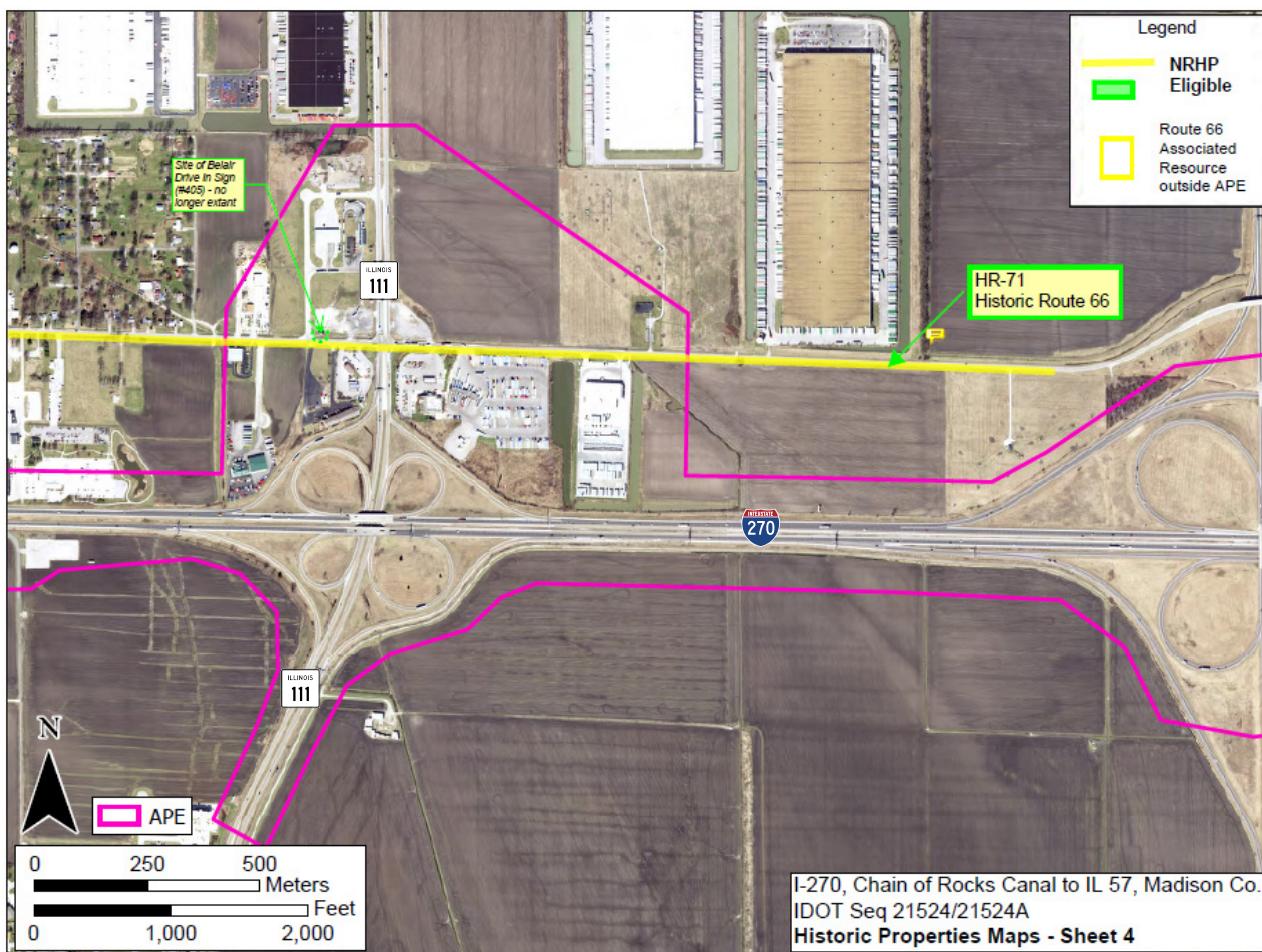
- Chain of Rocks Canal - eligible for listing in the NRHP (Appendix B: Historic Properties Maps – Sheet 1)
- Midway Motel – eligible for listing in the NRHP (Appendix B: Historic Properties Maps – Sheet 3)
- Nix-Judy Pioneer Cemetery - eligible for listing in the NRHP (Appendix B: Historic Properties Maps – Sheet 6)
- Historic Route 66 - eligible for listing in the NRHP (Appendix B: Historic Properties Maps – Sheets 1-6)

The project will avoid any use (as defined in 23 CFR 774.17 Section 4(f) of the US Department of Transportation Act of 1966) of the Chain of Rocks Canal, Midway Motel and the Nix-Judy Pioneer Cemetery. The project will not require any temporary or permanent right of way from these three properties and will maintain access to the properties at all times during construction. Detailed descriptions of the Section 4(f) resource for which a Section 4(f) use will occur are included below.

4.1 Historic Route 66

Historic Route 66 from the Chain of Rocks Canal to IL 157 within the project area was deemed eligible for listing on the National Register of Historic Places under Criterion A as evaluated by FHWA and concurred upon by the Illinois State Historic Preservation Office (SHPO) (see Appendix C). Based on the proposed improvements, FHWA has determined and the SHPO has concurred that an adverse effect to Historic Route 66 will occur. Therefore, the impacts to Historic Route 66 are considered a Section 4(f) use per 23 CFR 774.17 Section 4(f) of the US Department of Transportation Act of 1966. Detailed maps showing the location of Historic Route 66 in relation to the project area are provided in Appendix B.

The segment of Historic Route 66 within the limits of the project area that will be adversely affected is shown on Figure 3 below. For the remainder of this document, Chain of Rocks Road where it is co-located with this segment of Historic Route 66 will be referred to as Historic Route 66 to simplify discussions of effects and alternatives.

Figure 3: Alternative 1 – Historic Route 66 Location within the area of the I-270/IL 111 Interchange

4.1.1 Officials with Jurisdiction

For Historic Route 66, the official with jurisdiction (OWJ) is the Illinois State Historic Preservation Officer (SHPO) because Historic Route 66 is considered eligible for listing on the NRHP between Chain of Rocks Canal and IL 157 in the project area.

4.1.2 Historic Significance

Historic Route 66 between the Chain of Rocks Canal and IL 157 was determined eligible for listing on the National Register of History Places (NRHP) with this project in March 2020, in consultation with the SHPO and the Historic Route 66 Road Ahead Partnership. The SHPO concurrence letter is provided in Appendix C and the historic significance is provided in the assessment of effects included in Appendix B and summarized below.

This section of Historic Route 66 was built between 1926 and 1936 and extends for 10.2 miles from IL 157 northwest of Glen Carbon to the Mississippi River Bridge at Chain of Rocks. In 1957, Historic Route 66 was rerouted on four-lane highway to the south, and this section was redubbed Bypass Historic Route 66. It was built as a two-lane rural highway with 18-20 foot wide paving, graveled shoulders, and roadside ditches.

Within the APE, Historic Route 66 runs along Chain of Rocks Road parallel to and north of I-270, crossing through the APE where the APE extends northwards along roads with interchanges to be improved with the undertaking. The roadway has been repaved multiple times, with portions near IL 111, and IL 3 reconstructed with wider through lanes, turn lanes, and paved shoulders. At IL 111, the roadway has been reconstructed 1,400 feet east and 900 feet west of the intersection. Turn lanes have been added here, resulting in a four-to five-lane wide cross-section, not similar to the historic design of this Historic Route 66 section.

The Historic Route 66 Corridor Study (Barton & Associates 1995), Historic Route 66 in Illinois MPDF (Serratt et al. 1997), Historic Route 66 National Historic Context Study (Cassity 2004), and Historic Route 66 Nationwide MPDF (NPS et al. 2011) all note that eligibility under Criterion C requires that the extant roadway retain a high degree of design, materials and workmanship, i.e. retain its historic cross section, roadway profile, drainage ditches, and bridges. Given the current condition of Historic Route 66 in the vicinity of and crossing the APE, it would be NRHP eligible only under Criterion A for its association with cross-county, long distance, or leisure automobile travel during the mid-20th century and for its association with popular culture of Historic Route 66. Its period of significance extends from its construction in 1926 through its loss of Federal highway designation in 1965.

Surveys of Historic Route 66 and its associated resources were conducted for IDOT in 1994 in conjunction with the Corridor Study (Barton-Aschman & Associates 1995), and in 2013 in conjunction with the Chicago to St. Louis High Speed Rail project (Vogel 2013). Associated resources, or those built in direct connection with the highway include: gas/service stations and garages/auto repair facilities; motels, tourist courts/cabins, and tourist camps/campgrounds; diners, cafes and restaurants; general stores and souvenir shops; and billboards and tourist signs. Within the APE, one Route 66 associated resource was identified during the historic resources inventory and determined NRHP eligible, the Midway Motel. As indicated previously, the project will have no adverse effect on the Midland Motel. All other extant associated resources along this section of Historic Route 66 fall outside of the APE (see maps in Appendix B).

4.1.3 Access

Access on the east end of the project area is provided by IL 157 and dead ends at the Mississippi River on the west end. There are numerous local roads that intersect Historic Route 66 along the project corridor. In addition to the local roads, IL 111, IL 203 and IL 3 intersect with Historic Route 66.

4.1.4 Usage

Historic Route 66 is used by local traffic as an east-west corridor alternative to I-270. In 2016 it carried approximately 10,200 vehicles per day in the section between IL 111 and I-255. By 2044, it is expected to carry 28,600 vehicles per day.

4.1.5 Existing and Planned Facilities

Existing facilities along Historic Route 66 include religious, lodging, storage and warehouse facilities, restaurants, service providers and residences.

There are no known facilities planned for Historic Route 66 other than those planned as a part of the I-270 improvement project. These improvements include constructing roundabouts at the existing Bel Air Drive intersection west of IL 111 and at the entrance to the Flying J truck parking lot east of IL 111.

4.1.6 Relationship to Similar Properties in Vicinity

Historic Route 66 is a local alternative route to I-270 for east-west travel in the area and provides access to services adjacent to the road. The Historic Route 66 is the main east-west corridor from IL 157 to IL 3, other than I-270.

Within the APE, one Historic Route 66 associated resource was identified during the historic resources inventory and determined NRHP eligible; the Midway Motel (HR 63-A, #412). All other extant associated resources along this section of Historic Route 66 fall outside of the APE, as shown on the attached Historic Properties & Historic Route 66 Map Set. Several have been lost since 2013, including the Belair Drive-In Neon Sign just west of IL 111 within the APE. A Rural Historic Route 66 Historic District is not present along this section of Historic Route 66 due to the amount of post 1970 infill along the corridor. At IL 111, associated resources have been replaced by modern gas stations, a truck stop, and an industrial park. In Mitchell, east of IL 203, post 1970 businesses line the roadway and flank the extant period resources. Lastly, multiple 1960s through 1980s residential subdivisions are sited along this section of Historic Route 66 that are associated with post WW II suburban growth, not long-distance travel. The landscape east of I-255 and west of IL 3 retains more integrity, as there is little to no post 1965 infill development at these locations which remain rural in character.

4.1.7 Elements Affecting Ownership

Historic Route 66 is owned and maintained by the various municipalities that the road crosses through. The area of proposed changes to Historic Route 66 is locally owned and maintained by IDOT. No ownership changes are proposed.

5.0 Avoidance Alternatives

The Section 4(f) statute imposes conditions on the use of land from historic sites for highway projects but makes no mention of bridges, highways, or other types of facilities such as railroad stations or terminal buildings, which may be historic and are already serving as transportation facilities. The FHWA's interpretation is that the Congress clearly did not intend to restrict the rehabilitation or repair of historic transportation facilities. The FHWA therefore established a regulatory provision that Section 4(f) approval is required only when a historic bridge, highway, railroad, or other transportation facility is adversely affected by the proposed project; e.g. the historic integrity (for which the facility was determined eligible for the NRHP) is adversely affected by the proposed project (See 23 CFR 774.13(a)).

Any proposed undertaking that would have an adverse effect to an historic road would be a Section 4(f) use. Alternatives that avoid adverse effects on Historic Route 66, and therefore would not result in a Section 4(f) use, include:

- No-Action Alternative
- Alternative 1 – Improved Signal Timing

An avoidance alternative is not considered feasible if it cannot be constructed as a matter of sound engineering judgment. According to 23 CFR 774.17 an avoidance alternative is not considered prudent if:

- 1) It compromises the project to a degree that it is unreasonable to proceed in light of the project's stated purpose and need (i.e., the alternative doesn't address the purpose and need of the project);
- 2) It results in unacceptable safety or operational problems;
- 3) After reasonable mitigation, it still causes severe social, economic, or environmental impacts; severe disruption to established communities; severe or disproportionate impacts to minority or low-income populations; or severe impacts to environmental resources protected under other Federal statutes;
- 4) It results in additional construction, maintenance, or operational costs of extraordinary magnitude;
- 5) It causes other unique problems or unusual factors; or
- 6) It involves multiple factors as outlined above that, while individually minor, cumulatively cause unique problems or impacts of extraordinary magnitude.

5.1 No-Action Alternative

This alternative would include no improvements to Historic Route 66 and retain the existing roadway physical features. This also assumes that no improvements will be made along the I-270 corridor or at the IL 111 interchange. There would be no adverse effect to Historic Route 66 between Chain of Rocks Canal and IL 157 and therefore no section 4(f) use.

5.1.1 Evaluation

This alternative assumes that no improvements will be made along the I-270 corridor or at the IL 111 interchange. Since this area roadway network operates as a transportation system, maintaining the existing conditions on Historic Route 66 will negatively impact the traffic capacity level of service and safety along the corridor and will directly impact adjacent roadways to which it directly connects, including IL 111, Bel Air Drive, and the Flying J entrance intersections. The no action alternative will not require land acquisition as no improvement will be made.

Capacity analysis using the Highway Capacity Manual (HCM) for the no build alternative in the design year (2044), determined that the majority of the roadway network will operate at LOS F during the morning and evening peak periods. The analysis also determined that several key movements at the intersections operate over capacity based on the v/c ratio.

As shown on table 2, the projected 2044 traffic volumes are over double the capacity of the IL 111 and Historic Route 66 intersection which would result in excessive delays and queues along both IL 111 and Historic Route 66. By 2044, the intersection of Historic Route 66 and the Flying J entrance is expected to experience a delay of over 90 minutes during both the morning and evening peak hours, with a v/c of 12.8 in the evening peak. The no build alternative fails to address the traffic capacity needs associated with existing and already planned expansion of industrial and commercial properties within the Historic Route 66 vicinity and will negatively impact the properties that it serves.

Table 2: Capacity Analysis - No Build Alternative

Intersection	2044 AM Peak		2044 PM Peak	
	Delay (LOS)	v/c	Delay (LOS)	v/c
Historic Route 66 & Bel Air Drive	NB=14.2 (B) SB=24.9 (D)	0.28	NB=26.3 (D) SB=45.9 (E)	0.65
Historic Route 66 & IL 111	239.5 (F)	2.05	412.5 (F)	2.60
Historic Route 66 & Flying J entrance	NB=2106.6 (F) SB=37.0 (E)	5.33	NB=5584.3 (F) SB=71.8 (F)	12.8

Red values represent unacceptable congestion for level of service analysis

NB = northbound

SB = southbound

AM = Morning

PM = Evening

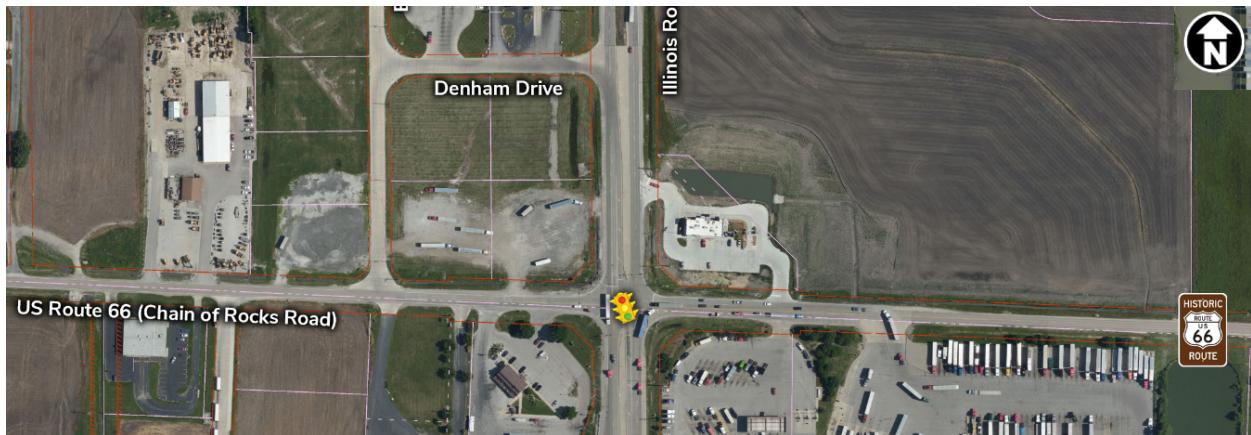
The implementation of the No-Build alternative does not address the purpose and need of the project. This alternative would perpetuate the unacceptable congestion along the existing corridor and does not support the overall project purpose to improve safety and reduce congestion along the project corridor.

The no build alternative is not feasible and prudent because (1) it compromises the project to such a degree that it is unreasonable to proceed with the project in light of its stated purpose and need; and (2) it results in unacceptable safety or operational problems. This alternative has been dismissed from further consideration.

5.2 Alternative 1 – Improved Signal Timing

This alternative would be limited to adjustments to existing signal timing at the IL 111 intersection with Historic Route 66 in combination with the associated improvements to the I-270 and IL 111 interchange to the south. The existing pavement width and lane configuration would remain, as shown on Figure 4. There would be no adverse effect to Historic Route 66 between Chain of Rocks Canal and IL 157 and therefore no section 4(f) use.

Figure 4: Alternative 1 – Improved Signal Timing



5.2.1 Evaluation

This alternative would include no improvements to Historic Route 66 and would retain the existing roadway physical features. Similar to the No Build Alternative, this alternative fails to provide adequate accommodations for the planned expansion of industrial and commercial properties in the vicinity. Increased traffic and longer than acceptable delays are anticipated to result in higher volumes of vehicle crash rates, particularly when considering the implementation of the I-270 and IL 111 interchange improvement, since this will result in funneling additional traffic to this sub-standard operational segment. The limited build option will not require land acquisition as limited improvements will be made.

As shown in Table 3, the improved signal timing at the IL 111 and Historic Route 66 intersection has little impact and the majority of the roadway network will operate at LOS F during peak periods in the design year and with projected volumes in excess of the intersection capacity. The improvements also fail to reduce the v/c ratio or the anticipated delays that would be experienced. This alternative fails to address the LOS criteria and therefore fails to meet the purpose and need for the project.

Table 3: Capacity Analysis of Alternative 1 – Improved Signal Timing

Intersection	2044 AM Peak		2044 PM Peak	
	Delay/LOS	v/c	Delay/LOS	v/c
Historic Route 66 & Bel Air Drive	NB=14.2 (B) SB=24.9 (D)	0.28	NB=26.3 (D) SB=45.9 (E)	0.65
Historic Route 66 & IL 111	235.9 (F)	2.24	363.0 (F)	2.31
Historic Route 66 & Flying J entrance	NB=2106.6 (F) SB=37.0 (E)	5.33	NB=5584.3 (F) SB=71.8 (F)	12.8

Red values represent unacceptable congestion for level of service analysis

NB = northbound

SB = southbound

AM = Morning

PM = Evening

Due to its failure to address the purpose and need of the project, this alternative is not prudent. The implementation of this alternative does not address the purpose and need of the project and its implementation would perpetuate the unacceptable congestion along the existing corridor and does not support the project purpose to improve safety and reduce congestion along the project corridor.

Alternative 1 is not feasible and prudent because (1) it compromises the project to a degree that it is unreasonable to proceed with the project in light of its stated purpose and need; and (2) it results in unacceptable safety or operational problems. This alternative has been dismissed from further consideration.

Therefore, the conclusion drawn from consideration of avoidance alternatives is that there is no feasible and prudent alternative that completely avoids the use of the Section 4(f) property.

6.0 Additional Alternatives Evaluated

As Section 5.0 demonstrated, there are no feasible and prudent alternatives that avoid the use of Section 4(f) resources. Additional alternatives were evaluated and considered in an effort to minimize Section 4(f) impacts and meet the project's Purpose and Need.

The following alternatives are analyzed in this section:

- Alternative 2 – Bel Air Drive Access, carried forward for further analysis
- Alternative 3 – Gateway Commerce Drive Access, dismissed
- Alternative 4 - Unsignalized Intersections on Historic Route 66, dismissed
- Alternative 5 – Signalized Intersections on Historic Route 66, dismissed
- Alternative 6 – Roundabouts on Historic Route 66, carried forward for further analysis

The alternative analysis aimed to incrementally improve operations and available transportation capacity in order to minimize the impact to Section 4(f) resources.

The subsequent sections describe the alternatives evaluated to minimize Section 4(f) impacts while trying to meet the project's Purpose and Need.

6.1 Alternative 2 – Bel Air Drive Access

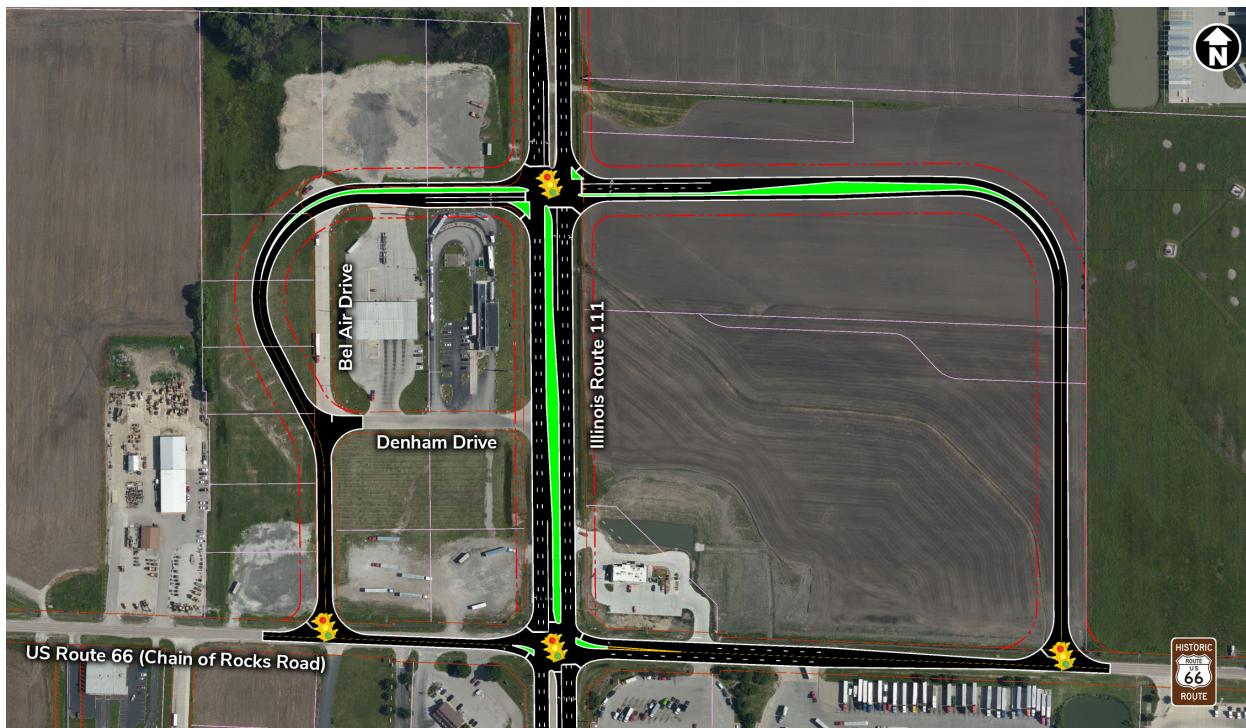
This alternative will consist of limiting access to the existing Historic Route 66 and IL 111 intersection in order to minimize impacts to this corridor by shifting the left turn traffic from Historic Route 66 north to a newly constructed signalized intersection at Bel Air Drive and IL 111.

Access to Historic Route 66 and IL 111 will be supplemented by the creation of north-south parallel access located east and west of IL 111, which will shift a portion of traffic from the current IL 111 and Historic Route 66 intersection to the north at Bel Air Drive. While traffic will be diverted away from the Historic Route 66 corridor at its intersection with IL 111, the projected traffic volumes will still require improvements to the IL 111 and Historic Route 66 intersection with the addition of through lanes along IL 111 and the addition of channelized right-turn lanes on Historic Route 66. East-west through traffic and traffic desiring to make a left turn from Historic Route 66 to IL 111 will be prohibited along Historic Route 66 at IL 111. These vehicles will be diverted to the north to maintain vehicular capacity and mitigate potential conflicting movements. The western access connection will utilize a portion of the existing Bel Air Drive alignment to provide access at IL 111 with a new signalized intersection.

This alternative requires 10.3 acres of right of way and will cost \$13.8M to construct. West of IL 111 the improvements will impact several open lots that are zoned for commercial development. While the placement of the alignment has been optimized, the remaining limited developable ground on these lots may result in uneconomical remnants which will leave them unusable for commercial development. The eastern connection would coordinate with the relocation of the Flying J truck entrance drive to the eastern Flying J property limits. From that point it would extend north, then curve back to the west to align with the Bel Air Drive intersection at IL 111. This alternative will result in 0.75 mile of adverse travel for

motorists frequenting businesses along Historic Route 66, including gas stations, hotels, restaurants, and other local establishments.

Figure 5: Alternative 2 – Bel Air Drive Access



As shown in Table 4, Alternative 2 would provide an acceptable level of service at all intersections, have reduced delay and v/c ratios, indicating the intersections would function at or below capacity.

Table 4: Capacity Analysis of Alternative 2 - Bel Air Drive Access

Intersection	2044 AM Peak		2044 PM Peak	
	Delay/LOS	v/c	Delay/LOS	v/c
Historic Route 66 & Bel Air Drive	20.6 (C)	0.90	23.7 (C)	0.77
Historic Route 66 & IL 111	8.6 (A)	0.68	12.0 (B)	0.77
Historic Route 66 & Flying J truck entrance	14.1 (B)	0.90	39.0 (D)	0.98
IL 111 & Bel Air Drive	29.4 (C)	0.84	33.2 (C)	0.81

Red values represent unacceptable congestion for level of service analysis

AM = Morning

PM = Evening

The new signalized intersections along Historic Route 66 at Bel Air Drive and at the Flying J truck entrance would result in three signalized intersections within 1,150 feet. The presence of such closely spaced signalized intersections would not meet standard IDOT signal spacing guidelines.

Due to the need to limit access for the existing Historic Route 66 and IL 111 intersection to right turn only movements, driving the Historic Route 66 historic alignment through the IL 111 intersection would no longer be possible. Drivers would be required to take the additional 0.75-mile Bel Air Access Road to continue on Historic Route 66 beyond the IL 111 intersection. Because this alternative would alter the access and thru travel route of Historic Route 66, diminishing the setting and travel experience on Historic Route 66, it would not be consistent with the Secretary's Standards for the Treatment of Historic Properties, and thus would constitute an adverse effect under 36 CFR 800.5(a)(2)(ii). Because of the adverse effect to an historic road, this alternative would result in a Section 4(f) use.

This alternative addresses the purpose and need for the project and will be carried forward for the least overall harm analysis.

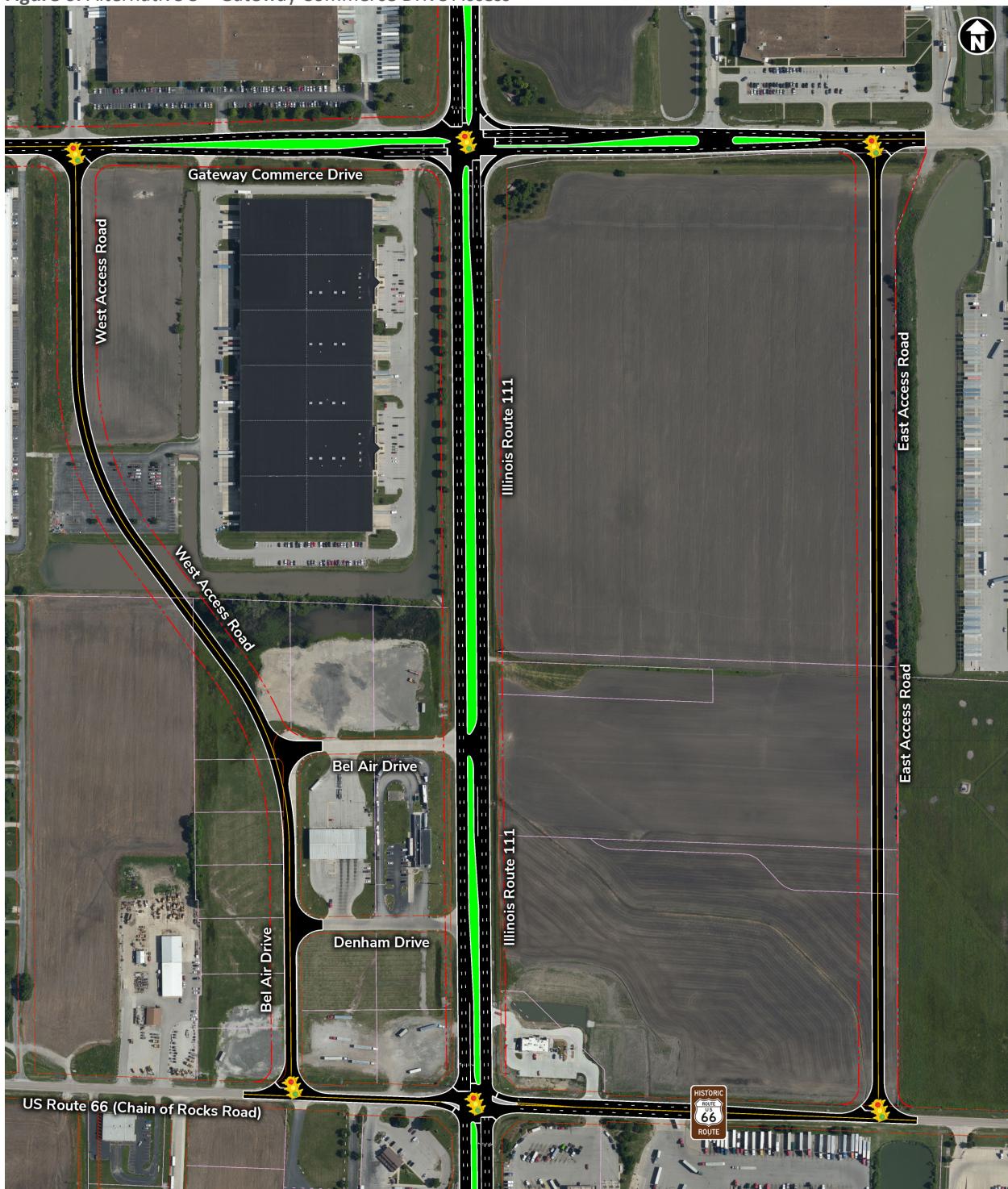
6.2 Alternative 3 – Gateway Commerce Drive Access

Alternative 3 will consist of limiting access to IL 111 at the existing Historic Route 66 and IL 111 intersection in order to minimize impacts along this corridor by shifting most traffic from Historic Route 66 north to newly constructed access point along Gateway Commerce Drive. New north-south access roads located east and west of IL 111 will connect Historic Route 66 to Gateway Commerce Drive. Signalized intersections will be required at the intersections of the access roads with both Historic Route 66 and Gateway Commerce Drive.

The western connection will utilize a portion the existing Bel Air Drive alignment and will extend north through both developed and undeveloped commercial properties to Gateway Commerce Drive. The eastern connection will coordinate with the relocation of the Flying J truck entrance drive east to the eastern Flying J property limits, extending north through undeveloped commercial properties to Gateway Commerce Drive. The Gateway Commerce Drive corridor will be improved to accommodate additional traffic diverted from Historic Route 66; the improvements will include lane channelization, added lanes, increased storage lengths for turn lanes and signal improvements. While traffic will be diverted away from the Historic Route 66 corridor, the projected traffic volumes will still require improvements to the IL 111 and Historic Route 66 intersection, including the restriction of thru traffic along Historic Route 66 and the addition of lanes on IL 111.

The new signalized intersections along Historic Route 66 at Bel Air Drive and at the Flying J truck entrance will result in three signalized intersections within 1,150 feet. The presence of such closely spaced signalized intersections would not meet IDOT signal spacing guidelines.

Figure 6: Alternative 3 – Gateway Commerce Drive Access



As shown in Table 5, under this alternative, the majority of the roadway network will operate at LOS C or better in the design year. However, the IL 111 and Gateway Commerce Drive intersection would operate over capacity with an unacceptable LOS F during the PM peak hour.

Table 5: Capacity Analysis of Alternative 3 - Gateway Commerce Drive Access

Intersection	2044 AM Peak		2044 PM Peak	
	Delay/LOS	v/c	Delay/LOS	v/c
Historic Route 66 & Bel Air Drive	15.9 (B)	0.66	23.7 (C)	0.77
Historic Route 66 & IL Route 111	6.5 (A)	0.68	11.8 (B)	0.76
Historic Route 66 & Flying J	27.8 (C)	0.88	43.4 (D)	1.04
IL Route 111 & Gateway Commerce	47.2 (D)	1.04	94.8 (F)	1.32

Red values represent unacceptable congestion for level of service analysis

AM = Morning

PM = Evening

This alternative would require 1.5 miles of additional travel for motorists frequenting the businesses along Historic Route 66, including gas stations, hotels, restaurants, and other local establishments. Due to the need to limit access for the existing Historic Route 66 and IL 111 intersection to right turn only movements, driving the Historic Route 66 historic alignment through the IL 111 intersection would no longer be possible. Drivers would be required to take the additional 1.5-mile Gateway Commerce Drive access route to continue on Historic Route 66 beyond the IL 111 intersection. Because this alternative would alter the access and thru travel route of Historic Route 66, diminishing the setting and travel experience on Historic Route 66, it would not be consistent with the Secretary's Standards for the Treatment of Historic Properties, and thus would constitute an adverse effect under 36 CFR 800.5(a)(2)(ii). Because of the adverse effect to an historic road, this alternative would result in a Section 4(f) use.

This alternative will result in a design year intersection LOS F. Since this alternative fails to meet the purpose and need, it has been dismissed and will not be carried forward for further analysis.

6.3 Alternate 4 – Unsignalized Intersections on Historic Route 66

This alternative will include the improvement of intersections along Historic Route 66 at Bel Air Drive, at the Flying J car entrance and at the Flying J truck entrance, as well as the addition of through lanes and turn lanes. Due to the high truck volumes along this corridor, development of full access intersections within a close proximity will result in the extension of lane channelization along the entire 2,500-foot improvement limits. Historic Route 66 will be widened to a seven-lane roadway segment from Bel Air Drive to east of the Flying J property and would result in approximately 2 acres of right of way acquisition from established commercial business that will likely impact long term operations. Access at the Flying J car entrance will be limited to right-in right-out movements and an internal circulation drive connecting the car parking lot to the truck parking lot will be needed within the Flying J property to accommodate left-turning cars. This alternative would require 2 acres of right of way and would cost \$8.1M to construct.

Figure 7: Alternative 4 – Unsignalized Intersections on Historic Route 66

The two unsignalized intersections along Historic Route 66 will function at unacceptable LOS (E or F) in the 2044 design year with significant delays for vehicles attempting to turn onto Historic Route 66 at a stop-controlled intersection, as shown on Table 6.

Table 6: Capacity Analysis of Alternative 4 - Unsignalized Intersections on Historic Route 66

Intersection	2044 AM Peak		2044 PM Peak	
	Delay/LOS	v/c	Delay/LOS	v/c
Historic Route 66 & Bel Air Drive	NB=14.1 (B) SB=24.5 (C)	0.28	NB=20.2 (C) SB=49.0 (E)	0.67
Historic Route 66 & IL 111	26.4 (C)	0.90	41.1 (D)	0.98
Historic Route 66 & Flying J truck entrance	NB=1793.7 (F) SB=30.1 (D)	4.66	NB=4120.4 (F) SB=53.1 (F)	10.5

Red values represent unacceptable congestion for level of service analysis

NB = northbound

SB = southbound

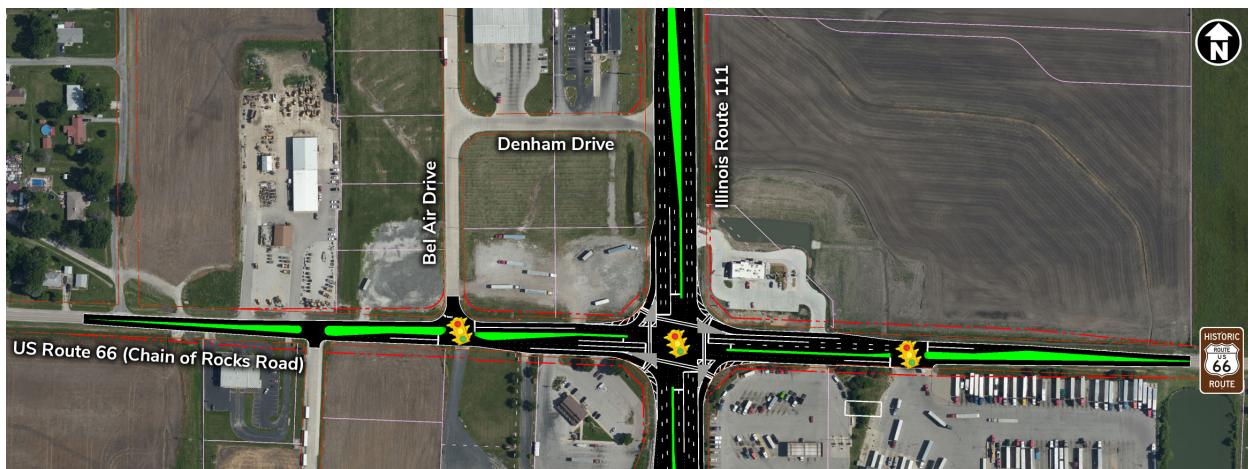
AM = Morning

PM = Evening

Due to the required widening and additional travel lanes, this alternative would alter the two-way character defining elements of Historic Route 66 and would not be consistent with the Secretary's Standards for the Treatment of Historic Properties, and thus would constitute an adverse effect under 36 CFR 800.5(a)(2)(ii). Because of the adverse effect to an historic road, this alternative would result in a Section 4(f) use. Since this alternative fails to address the purpose and need, it has been dismissed and will not be carried forward for further analysis.

6.4 Alternative 5 – Signalized Intersections on Historic Route 66

This alternative will include the construction of multiple signalized intersections along the Historic Route 66 corridor. These would be installed to manage traffic congestion within a short roadway segment having numerous access points with large traffic generators. Signals will be improved at IL 111, and new signals will be added at Bel Air Drive and the Flying J truck entrance, as shown on Figure 8.

Figure 8: Alternative 5 – Signalized Intersections on Historic Route 66

Due to the high truck volumes along this corridor, multiple signals within a close proximity will result in the extension of lane channelization along the entire improvement limits. Historic Route 66 would need to be widened to a 7 lane roadway section from Bel Air Drive to east of the Flying J property and would result in right of way acquisition from established commercial business that will likely impact their long term operations. Close signal spacing leads to driver confusion because guidance and signage in accordance with the MUTCD is nearly impossible to implement due to restricted development lengths between intersections. This alternative would require 2 acres of right of way and would cost \$8.6M to construct.

As shown on Table 7, while some intersections function at an appropriate LOS, the Historic Route 66 and Flying J entrance intersection would operate at LOS F in the evening peak and operate above capacity in both the morning and evening peak hours.

Table 7: Capacity Analysis Alternative 5 - Signalized Intersections on Historic Route 66

Intersection	2044 AM Peak		2044 PM Peak	
	Delay/LOS	v/c	Delay/LOS	v/c
Historic Route 66 & Bel Air Drive	14.1 (B)	0.57	11.9 (B)	0.55
Historic Route 66 & IL Route 111	27.7 (C)	0.80	42.6 (D)	0.98
Historic Route 66 & Flying J	76.0 (E)	1.35	107.8 (F)	1.44

Red values represent unacceptable congestion for level of service analysis

AM = Morning

PM = Evening

The addition of lanes and widening of pavement for 2,500 linear feet for this alternative would not be consistent with the Secretary's Standards for the Treatment of Historic Properties, constituting an adverse effect under 36 CFR 800.5(a)(2)(ii). Because of the adverse effect to an historic road, this alternative would result in a Section 4(f) use.

Since this alternative fails to provide an acceptable capacity, it does not meet the purpose and need for the project. Therefore, it has been dismissed and will not be carried forward for further analysis.

6.5 Alternative 6 – Roundabouts on Historic Route 66

The proposed improvements associated with Alternative 6 will include the construction of two roundabouts: one at the Bel Air Drive intersection west of IL 111 and a second one at a relocated driveway at the east end of the Flying J parking lot. The roundabouts will accommodate trucks accessing the adjacent industrial and commercial land uses. The proposed design also protects the functional area of the signalized intersection at IL 111 and Historic Route 66 with raised medians between the roundabouts. Existing access points along Historic Route 66 will remain but will be converted to right in, right out operation. Vehicles desiring access from or to the opposite side of the road will complete a U-turn at the roundabout intersection to reverse direction. The roundabouts will improve traffic circulation in the vicinity of the IL 111 and Historic Route 66 intersection by eliminating closely spaced intersections and overlapping opposing left turn lanes at private driveways.

In addition, the high level of service and low delay on the US Route 66 corridor will also manage speeds on the westbound US Route 66 approach as congestion increases within the study area.

The FHWA Office of Safety identified roundabouts as a proven safety countermeasure because of their ability to substantially reduce the types of crashes that result in injury or loss of life. This is accomplished, in part, by lower operating speeds and reduced conflict points when compared to traditional intersections. Highway safety professionals measure the crash reduction potential of safety improvements by comparing crashes before implementation of a safety improvement against crashes after implementation. The measured change in crashes is used to develop a crash modification factor, or CMF. The FHWA CMF Clearinghouse provides a 5-star CMF for conversion of a rural stop-controlled intersection to a single lane roundabout which is applicable to the Historic Route 66 corridor.

Figure 9: Alternative 6 – Roundabouts on Historic Route 66



As shown on Table 8, all intersections function at an appropriate LOS and operate below capacity in both the morning and evening peak hours in the design year. This alternative reduces vehicle delay along with the number and duration of stops when comparing to the other alternatives under consideration.

Table 8: Capacity Analysis Alternative 6 – Roundabouts on Historic Route 66

Intersection	2044 AM Peak		2044 PM Peak	
	Delay/LOS	v/c	Delay/LOS	v/c
Historic Route 66 & Bel Air Drive	6.2 (A)	0.36	7.8 (A)	0.47
Historic Route 66 & IL 111	26.4 (C)	0.90	41.1 (D)	0.98
Historic Route 66 & Flying J truck entrance	10.7 (B)	0.57	20.2 (C)	0.83

Red values represent unacceptable congestion for level of service analysis

AM = Morning

PM = Evening

This alternative requires 3.6 acres of right of way and will cost \$9M to construct. This alternative provides the best safety performance, requires the least right of way and has the lowest cost of those that meet the desired level of service.

Because this alternative would physically alter the existing Route 66 alignment and add roundabouts, which are non-historic elements, the character defining elements of the historic roadway will be altered. Therefore, this alternative would not be consistent with the Secretary's Standards for the Treatment of Historic Properties, and would constitute an adverse effect under 36 CFR 800.5(a)(2)(ii). This alternative has been determined to cause an adverse effect with concurrence from the SHPO in a letter dated May 15, 2020. Because of the adverse effect to an historic road, this alternative would result in a Section 4(f) use. This alternative fully meets the purpose and need for the project and will be carried forward for the least overall harm analysis.

7.0 Least Overall Harm Analysis

If the evaluation of avoidance alternatives concludes that there is no feasible and prudent avoidance alternative, then, from among the alternatives that would use Section 4(f) property, the alternative that causes the least overall harm to Section 4(f) property may be approved. This analysis is required when multiple alternatives that use Section 4(f) property remain under consideration. If the assessment of overall harms finds that two or more alternatives are substantially equal, FHWA can approve any of those alternatives. To determine which of the alternatives would cause the least overall harm, seven factors set forth in 23 CFR 774.3(c)(1) must be balanced. When comparing the alternatives under these factors, comparable mitigation measures are considered. The first four factors relate to the net harm that each alternative would cause to Section 4(f) property:

1. The ability to mitigate adverse impacts to each Section 4(f) property (including any measures that result in benefits to the property);
2. The relative severity of the remaining harm, after mitigation, to the protected activities, attributes, or features that qualify each Section 4(f) property for protection;
3. The relative significance of each Section 4(f) property; and
4. The views of the officials with jurisdiction over each Section 4(f) property.

The remaining three factors to be compared take into account any substantial problem with any of the alternatives remaining under consideration on issues beyond Section 4(f). These factors are:

1. The degree to which each alternative meets the purpose and need for the project;
2. After reasonable mitigation, the magnitude of any adverse impacts to resources not protected by Section 4(f); and
3. Substantial differences in costs among the alternatives.

By balancing the seven factors, all relevant concerns are considered to determine which alternative would cause the least overall harm to Section 4(f) property, which allows FHWA to fulfill its statutory mandate to make project decisions in the best overall public interest.

This Section 4(f) evaluation discloses the various impacts to Section 4(f) property that would result from the alternatives under consideration. Two of the alternatives evaluated resulted in a use of a Section 4(f) historic resource, met the purpose and need and have been carried forward to the least overall harm analysis: Alternative 2 and Alternative 6.

Table 9: Summary of Least Overall Harm Determination

Factors (CFR 774.3)	Alt 2: Bel Air Drive Access	Alt 6: Roundabouts on Route 66	Least Overall Harm
<i>The ability to mitigate adverse impacts to Section 4(f) property</i>	Travel on Route 66 would not occur through IL 111 and interpretive elements would be incorporated	Travel on Route 66 would continue through IL 111 and interpretive elements would be incorporated	Neutral
<i>Remaining harm to 4(f) properties after mitigation</i>	Historic Route 66 alignment altered due to no through travel at IL 111	Approximately 3,150 linear feet of roadway pavement widening, shifting centerline non-historic elements added	Alt 2
<i>Relative significance of Section 4(f) property</i>	High	High	Neutral
<i>View of official with jurisdiction</i>	Adverse effect to Historic Route 66	Adverse effect to Historic Route 66	Neutral
<i>The degree to which each alternative meets the purpose and need (P&N) for the project</i>	Meets the primary P&N elements but does not meet the secondary project purpose to provide connectivity in support of economic development as well as Alternative 6 due to the impacts to local property owners and businesses and the lack of easy access	Fully meets the P&N along with the secondary project purpose to provide connectivity supporting economic development. The amount of right of way from local property owners and businesses is only 3.6 acres and would not require the 0.75 miles of additional travel required to access local businesses	Alt 6
<i>Magnitude of any adverse impacts to resources not protected by Section 4(f)</i>	Impacts local businesses/property owners due to 10.3 acres of additional right of way and ease of access and adds 0.75 miles of additional travel	Has lower impact to local businesses based on 3.6 acres of additional right of way and ease of access from Historic Route 66; lower air pollution emissions	Alt 6
<i>Cost</i>	\$13.9M	\$9M	Alt 6

Alternative 6 is the alternative determined to cause the least overall harm based the seven factors above. Alternative 6 bests meet the purpose and need, including the secondary purpose of connectivity to I-270 in support of economic development. Due to the incorporation of roundabouts, access to local businesses will continue along Historic Route 66 and air pollution emissions from vehicles would be expected to be lower than for the signalized intersections under alternative 2. Right of way impacts from private property owners and business would be only 3.6 acres for alternative 6 compared to 10.3 acres for alternative 2. Finally, alternative 6 would cost approximately 50 percent less to construct than alternative 2.

8.0 Impacts of Alternative 6

The proposed alternative to upgrade Historic Route 66 at IL 111 will directly alter and cause physical destruction of Historic Route 66. The Historic Route 66 roadway will be widened from two to four lanes for approximately 3,150 feet (0.6 mile), across its intersection with IL 111. New roundabouts are proposed on Historic Route 66, one in each direction from the intersection. At the eastern roundabout, the centerline of Historic Route 66 will be realigned to curve to the north. At the intersection, Historic Route 66 will be widened from two to six lanes and IL 111 will be widened from four to eight lanes to accommodate multiple through lanes and left and right turn lanes in all directions. Though repaving and minor widening can occur to Historic Route 66 without removing its integrity and eligibility under Criterion A (IL MPDF 1997, Nationwide MPDF 2011), adding non-historic elements like roundabouts and curving centerlines will alter character defining elements of the historic roadway. The proposed design for Historic Route 66 including additional lanes, roundabouts, and shifted centerline collectively cause an adverse effect to Historic Route 66.

This alternative reduces vehicle delay along with the number and duration of stops when compared to the signalized intersection included in Alternative 2. In a study analyzing the effects of roundabouts on pollution, Garceau (2018) concluded PM2.5 concentrations in the vicinity of an intersection were as much as 40% lower adjacent to a roundabout when compared with a traditional intersection. Hesch (2007) also reported a reduction in air pollutant emissions from roundabouts compared to signalized intersections, ranging from a 16.36% reduction in nitrous oxide to a 26.05% reduction in hydrocarbons. Therefore, air quality impacts are expected to be reduced by the implementation of this alternative.

This alternative would result in no tree removals and would not use any land from designated natural areas or result in water resource or floodplain impacts. No other environmental resource impacts will occur in the area of the proposed roundabouts on Historic Route 66. The project will be constructed while maintaining access to all businesses along the corridor. Lane closures will be necessary to complete the project but no full closure or detour for Historic Route 66 will occur.

Because this alternative would add roundabouts, which are non-historic elements, and would alter the existing centerline, width of pavement and number of travel lanes on Historic Route 66, this alternative would not be consistent with the Secretary's Standards for the Treatment of Historic Properties and would constitute an adverse effect under 36 CFR 800.5(a)(2)(ii). Therefore, it is considered a Section 4(f) use as a historic transportation facility. This alternative has been determined to cause an adverse effect with concurrence from the SHPO in a letter dated May 15, 2020 (Appendix C).

9.0 All Possible Planning to Minimize Harm

9.1 Design Measures that Minimize Use of Section 4(f) Property

Measures to minimize harm to the identified Section 4(f) property were identified in consultation with the SHPO. Mitigation measures to be incorporated into a Memorandum of Agreement (MOA) are to be determined through Section 106 consultation as described in the next section. Therefore, the Preferred Alternative has incorporated all possible planning to minimize harm to Section 4(f) property.

9.2 Mitigation Measures

Preliminary mitigation measures have been identified and are discussed below. Coordination regarding mitigation measures to the permanent uses of Section 4(f) properties is ongoing. Additional mitigation measures will be considered through Section 106 consultation with consulting parties and the public and final mitigation measures for Section 4(f) use will be included in the Final Section 4(f) evaluation. Coordination with the following agencies will determine final mitigation measures that will be incorporated into the project:

- State Historic Preservation Officer (OWJ)
- Illinois Historic Route 66 Scenic Byway

The following proposed mitigation measures have been identified in the draft MOA.

9.2.1 Coordinate Construction Schedules

The IDOT shall furnish to the Illinois Historic Route 66 Scenic Byway information about the location and timing of planned construction on Historic Route 66/Chain-of-Rocks Road. This information shall be provided as soon as feasible.

9.2.2 Adequate Detour Signage

For detours required during this Project, the IDOT, in consultation with the Illinois Historic Route 66 Scenic Byway, shall develop adequate detour signage that safely and effectively returns travelers to Historic Route 66/Chain-of-Rocks Road as soon as feasible. At a minimum the detour signage shall include Historic Route 66 signs.

9.2.3 Install “Ancient Historic Route 66” Interpretative Sign at Chain-of-Rocks Bridge

The IDOT will develop and install an interpretative sign at the Chain-of-Rocks Bridge parking lot that shows the early alignments of Historic Route 66 in the American Bottom region of the Mississippi Valley. It will explain how these and other highway alignments today retrace ancient Native American overland trails. These overland trails connected Cahokia Mounds and related settlements in the American Bottom with settlements in other regions and river valleys. The content of the sign will be developed in consultation with the SHPO, Illinois Historic Route 66 Scenic Byway, and Consulting Tribes. For more detailed information and for directions to the nearby Cahokia Mounds State Historic Site, the sign will display a QR (Quick Response) code that will link the visitor via their mobile device to a GIS-based Story Map and/or video about Cahokia Mounds and "Ancient Historic Route 66" alignments.

9.2.4 Develop Story Map and/or video about Cahokia Mounds and "Ancient Historic Route 66" Alignments

The IDOT will develop a GIS-based Story Map and/or video about Cahokia Mounds and "Ancient Historic Route 66" alignments in consultation with the SHPO, Illinois Historic Route 66 Scenic Byway, and Consulting Tribes. The Story Map and/or video shall be accessible and compatible with common mobile devices. The link will be shared with Cahokia Mounds State Historic Site, Illinois Historic Route 66 Scenic Byways, and other interested parties.

9.2.5 Incorporate "Bird Man" Image into the Chain-of-Rocks Road Roundabouts.

To help highlight the rich Native American heritage of the region, the IDOT will incorporate the Cahokia Mounds "Bird Man" image into the Chain-of-Rocks Road roundabouts. The image will be similar to those that adorn overpasses on I-255.

10.0 Coordination

The IDOT is the project sponsor and joint lead agency for the proposed project in coordination with the FHWA. The SHPO is the official with jurisdiction in terms of Section 4(f) regulations. IDOT has coordinated with SHPO throughout the Section 4(f) evaluation. 23 CFR 774.5 states that prior to making Section 4(f) approvals, the Section 4(f) evaluation shall be provided for coordination and comment.

The following additional organizations or individuals served as consulting parties:

- Illinois Historic Route 66 Scenic Byway
- Historic Route 66 The Road Ahead Partnership
- Great Rivers & Routes Tourism Bureau
- Osage Nation
- Miami Tribe of Oklahoma

Coordination documentation with OWJs and consulting parties will be included in Appendix C upon completion. The draft MOA has been included in Appendix D.

10.1 Officials with Jurisdiction

Coordination efforts with the OWJ, the Illinois SHPO, are ongoing.

Through the Section 106 process, SHPO concurred with the properties that are eligible for the NRHP. The conclusion of the Section 106 process will result in a Memorandum of Agreement (MOA) among FHWA, the SHPO and IDOT. The MOA will identify measures to mitigate adverse effects to historic properties. The mitigation measures from the MOA will be included in the Final Section 4(f) evaluation as measures to mitigate harm to the Section 4(f) historic properties.

11.0 References

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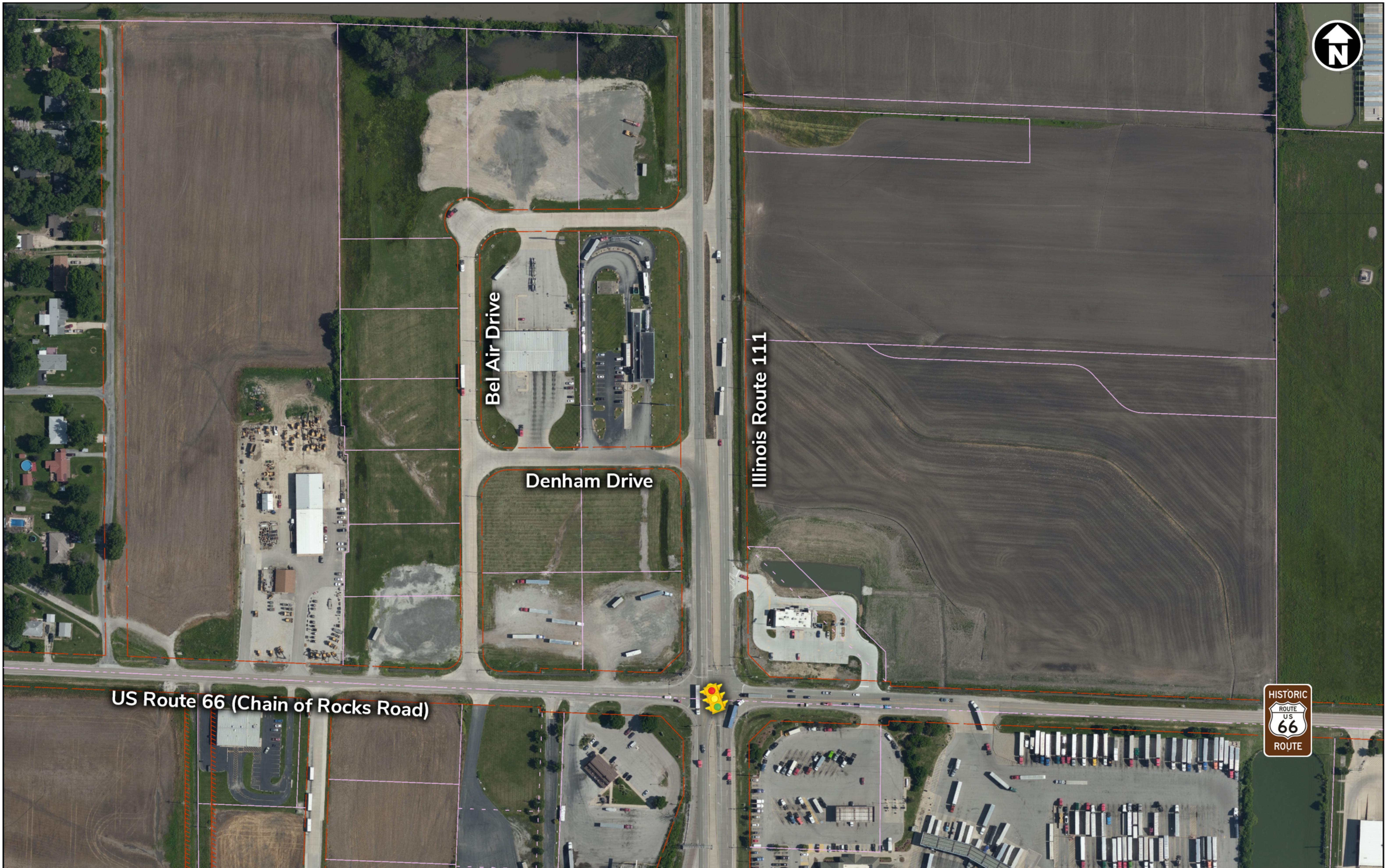
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Appendix A

Project Mapping



MODEL: SH001NAMES
FILE NAME: SH001S

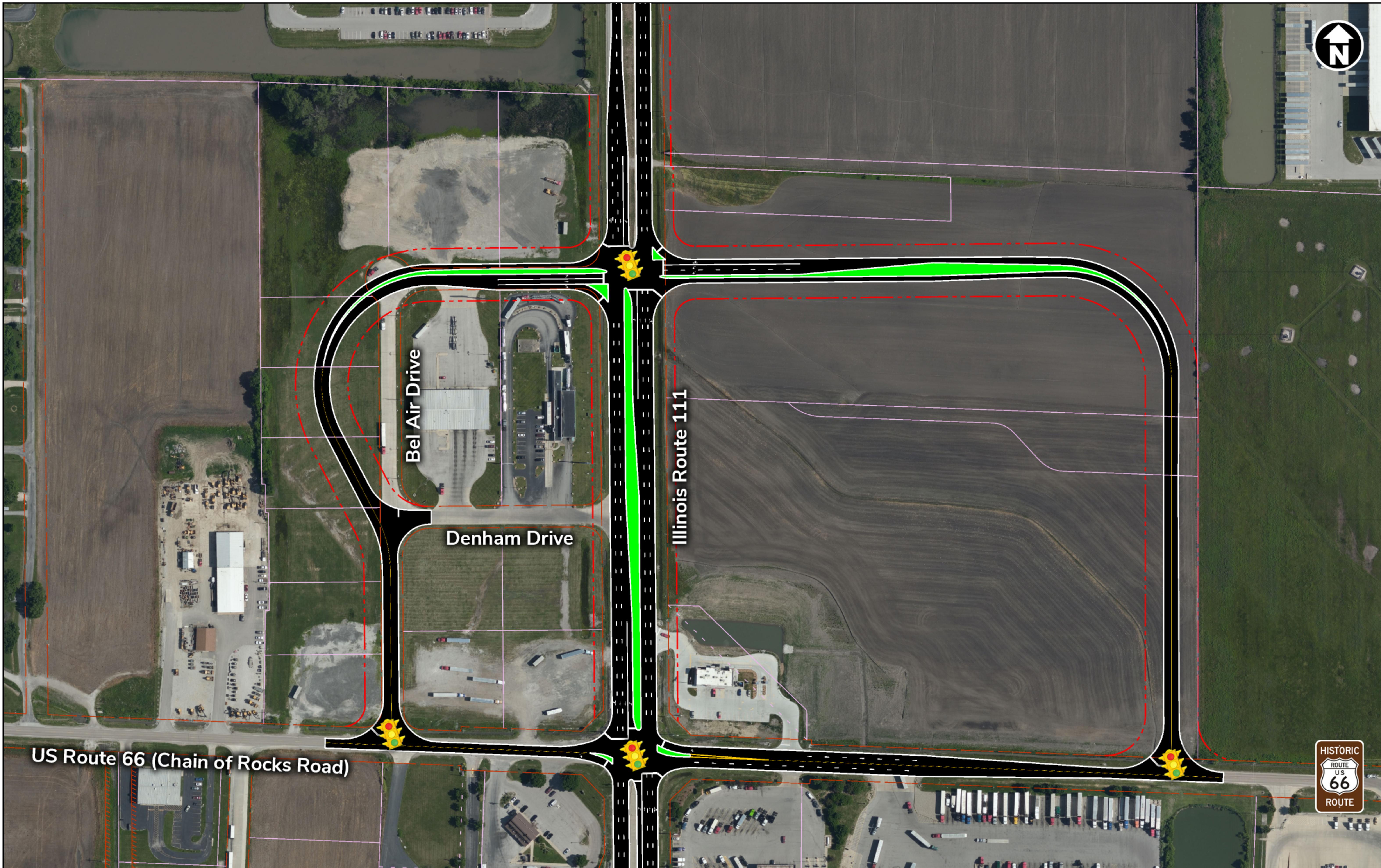
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STATE OF ILLINOIS
DEPARTMENT OF TRANSPORTATION

ALTERNATIVE 1 - LIMITED BUILD

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582	60-(1,2,3,4)WRS-1	MADISON	1	1
		CONTRACT NO.		

SCALE: SHEET 1 OF 1 SHEETS STA. TO STA. ILLINOIS FED. AID PROJECT



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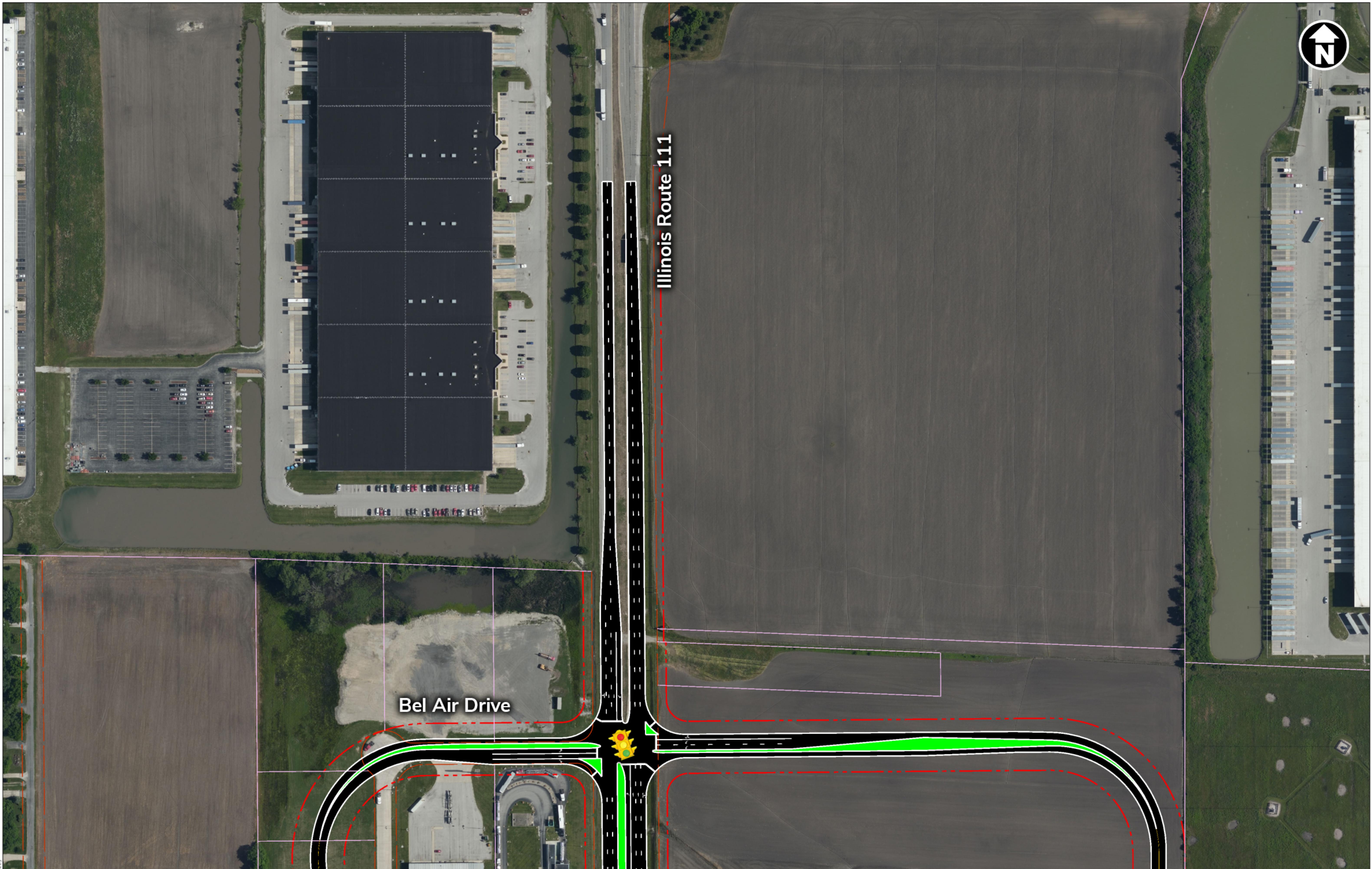
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STATE OF ILLINOIS
DEPARTMENT OF TRANSPORTATION

ALTERNATIVE 2 - BEL AIR DRIVE
ACCESS ROAD

F.A.P. RTE.	SECTION	COUNTY	TOTAL SHEETS	HEET NO.
582	60-(1,2,3,4)WRS-1	MADISON	2	1
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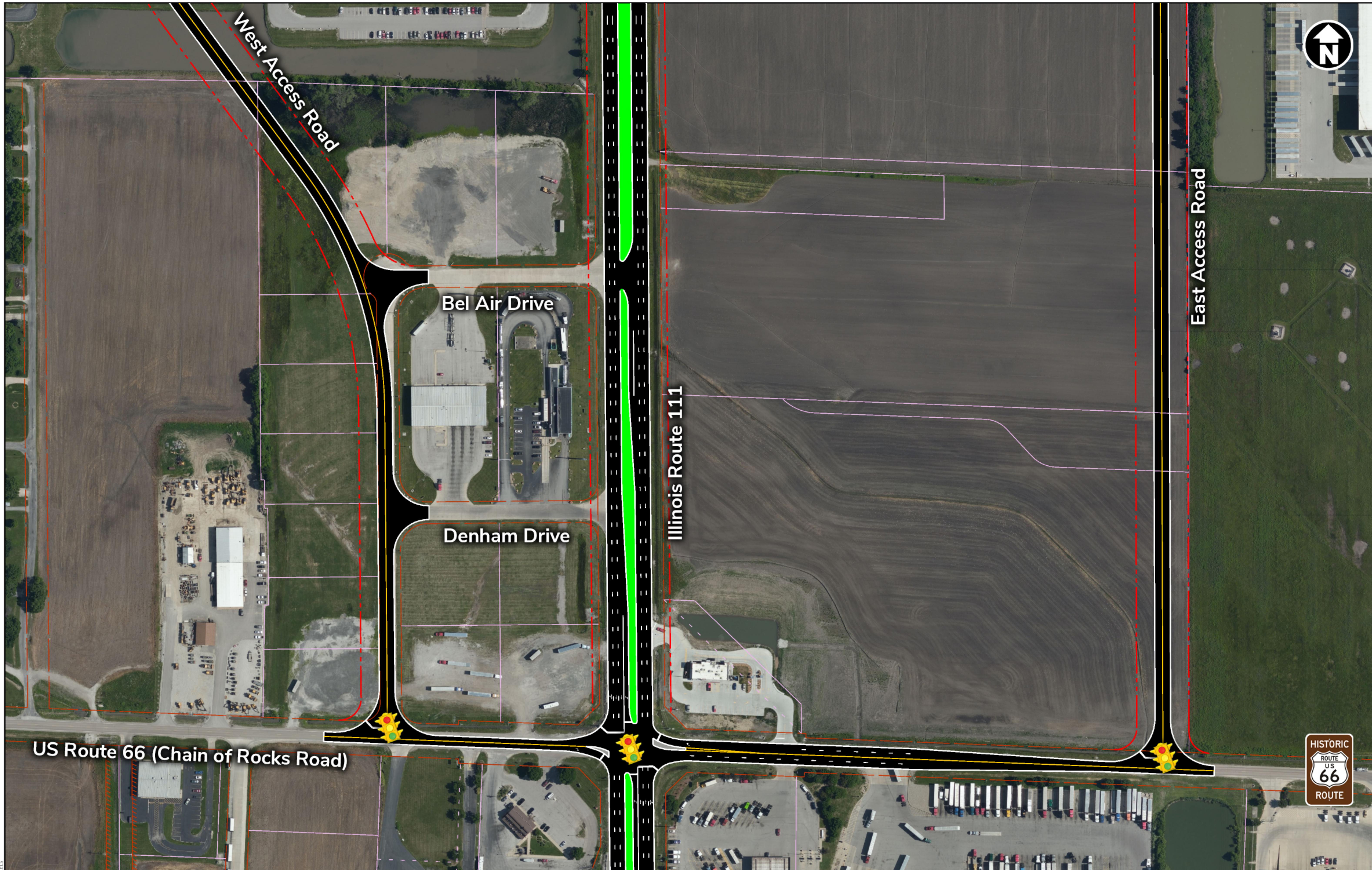
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STATE OF ILLINOIS
DEPARTMENT OF TRANSPORTATION

ALTERNATIVE 2 - BEL AIR DRIVE
ACCESS ROAD

F.A.P. RTE.	SECTION	COUNTY	TOTAL SHEETS	HEET NO.
582	60-(1,2,3,4)WRS-1	MADISON	2	2
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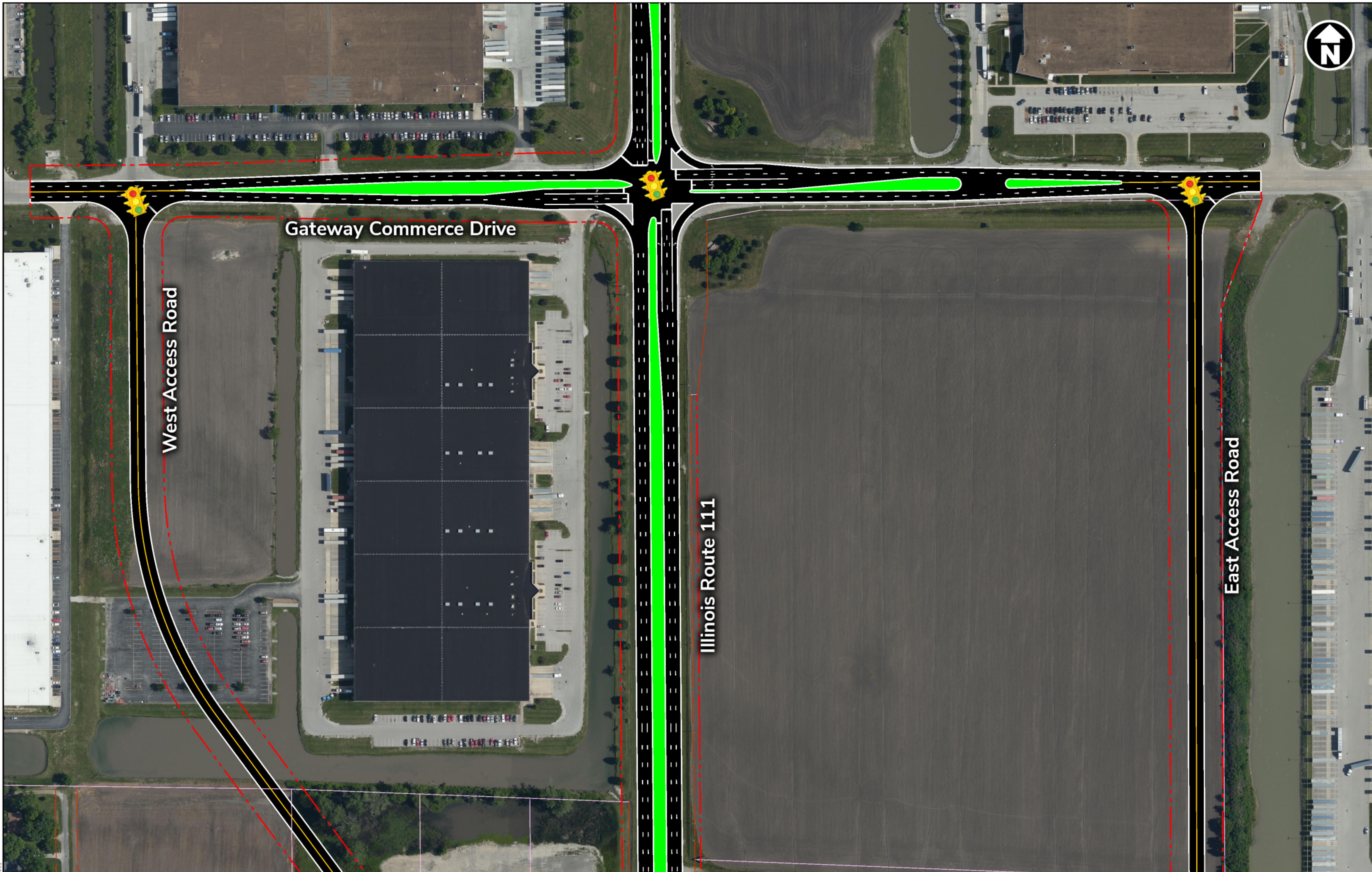
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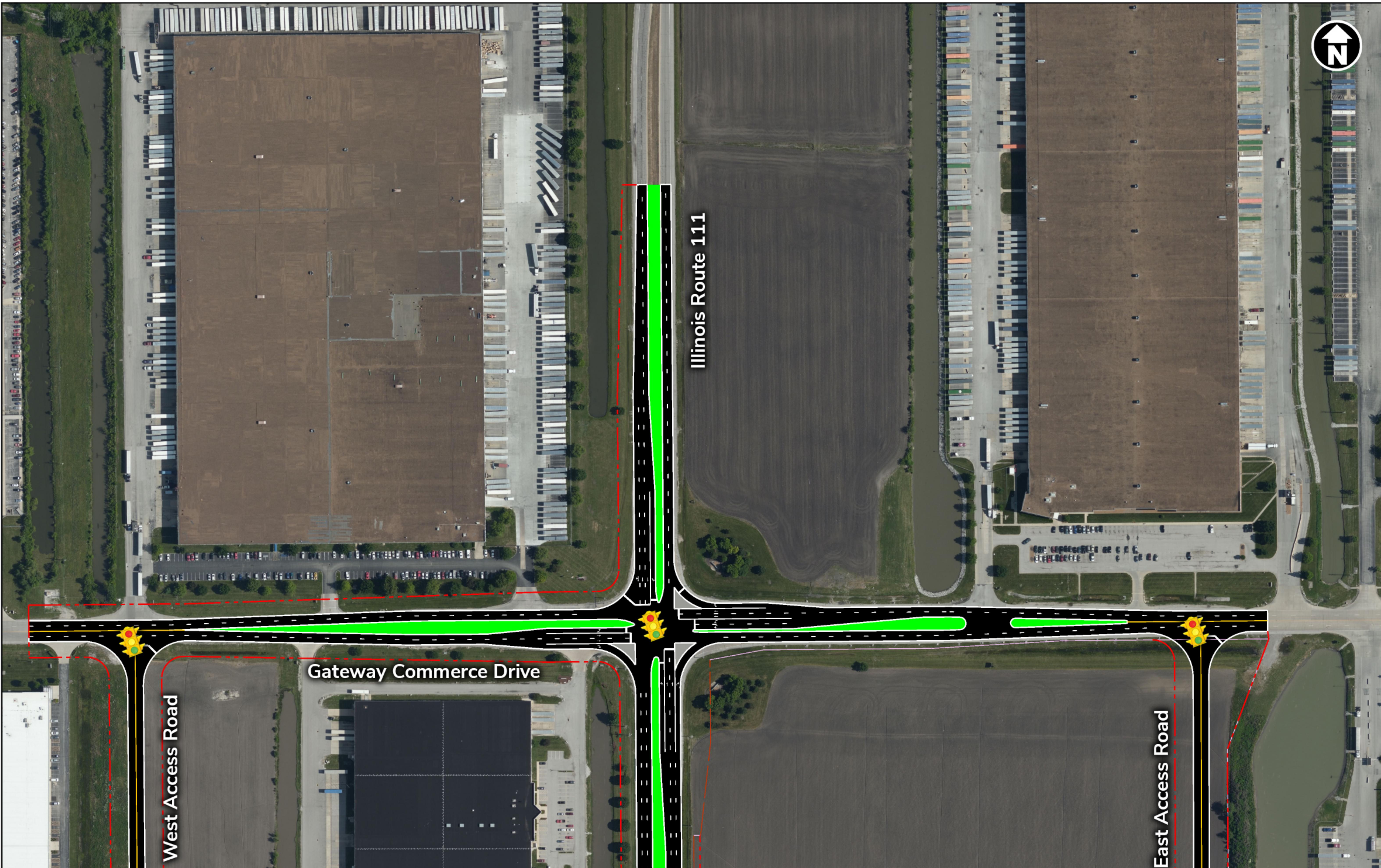
STATE OF ILLINOIS
DEPARTMENT OF TRANSPORTATION

ALTERNATIVE 3 - GATEWAY
COMMERCE DRIVE ACCESS ROAD

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582	60-(1,2,3,4)WRS-1	MADISON	3	1
		CONTRACT NO.		

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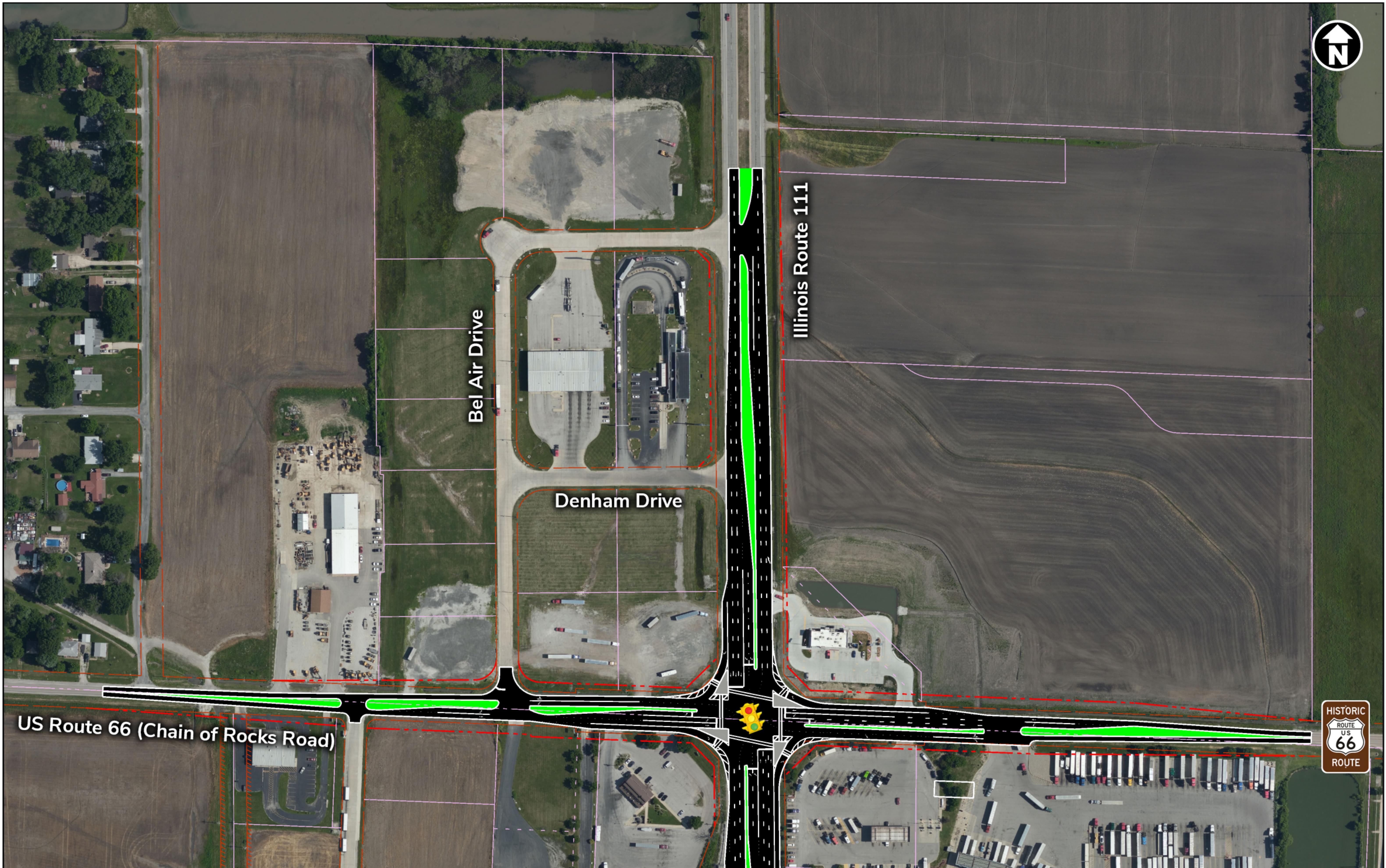




ALTERNATIVE 3 - GATEWAY
COMMERCE DRIVE ACCESS ROAD

F.A.P. RTE.	SECTION	COUNTY	TOTAL SHEETS	HEET NO.
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		CONTRACT NO.		

SCALE: SHEET 3 OF 3 SHEETS STA. TO STA. ILLINOIS FED. AID PROJECT



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STATE OF ILLINOIS
DEPARTMENT OF TRANSPORTATION

ALTERNATIVE 4 – UNSIGNALIZED
INTERSECTIONS ON ROUTE 66

F.A.P. RTE.	SECTION	COUNTY	TOTAL SHEETS	HEET NO.
582	60-(1,2,3,4)WRS-1	MADISON	1	1
		CONTRACT NO.		

SCALE: SHEET 1 OF 1 SHEETS STA. TO STA. ILLINOIS FED. AID PROJECT





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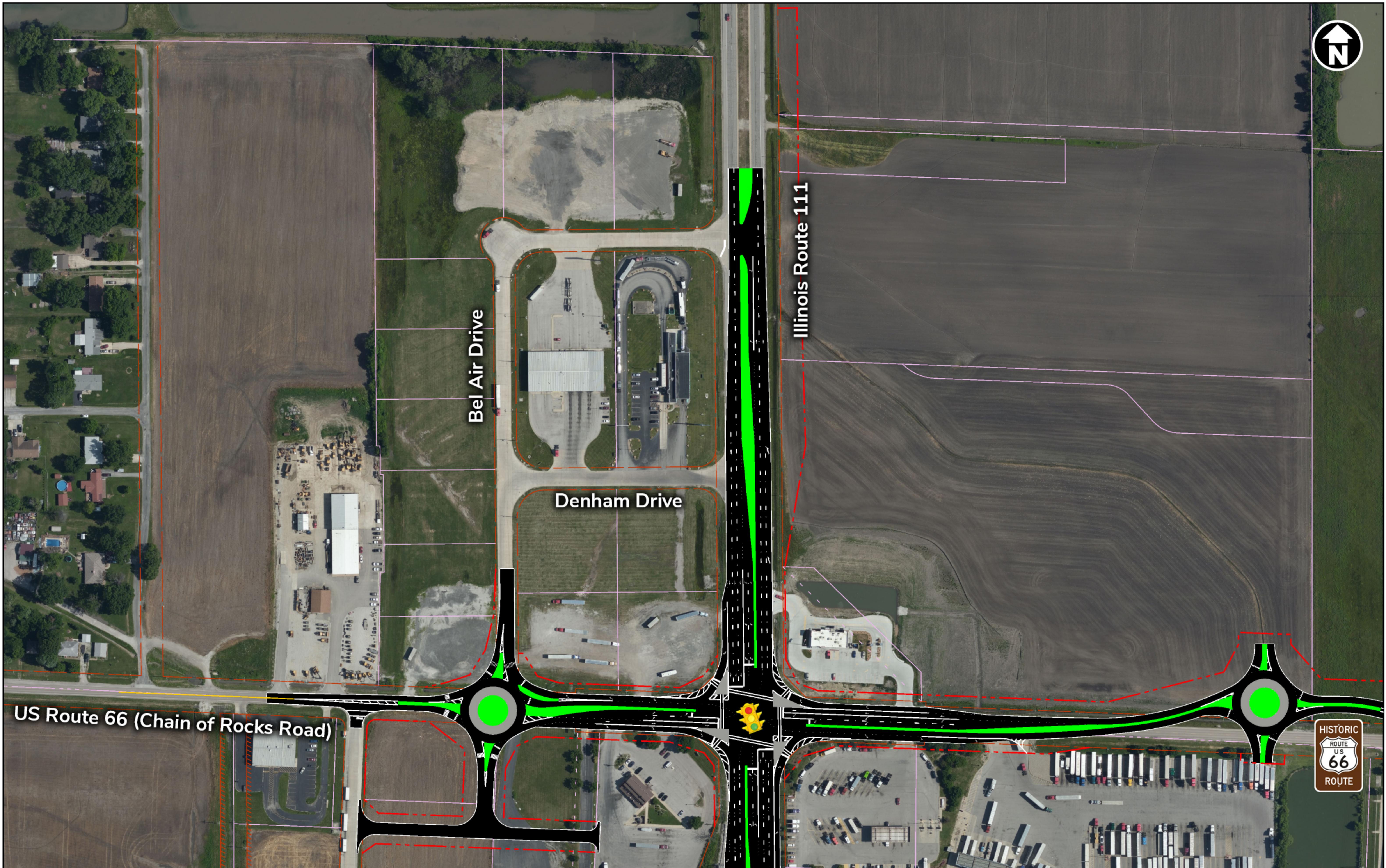
STATE OF ILLINOIS
DEPARTMENT OF TRANSPORTATION

ALTERNATIVE 5 - SIGNALIZED
INTERSECTIONS ON ROUTE 66

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		CONTRACT NO.		

SCALE: SHEET 1 OF 1 SHEETS STA. TO STA. ILLINOIS FED. AID PROJECT





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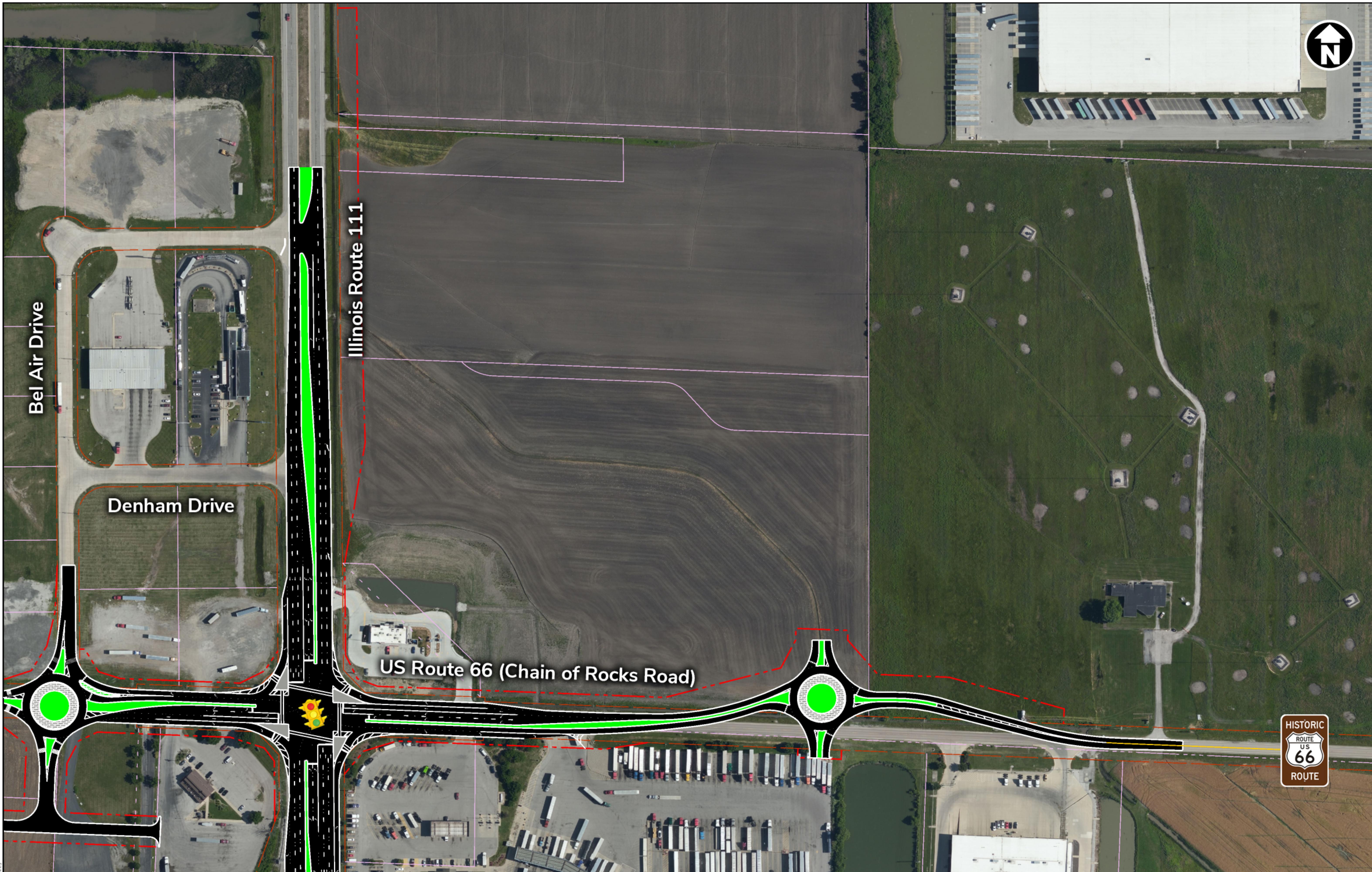
STATE OF ILLINOIS
DEPARTMENT OF TRANSPORTATION

ALTERNATIVE 6
ROUNDABOUTS ON ROUTE 66

F.A.P. RTE.	SECTION	COUNTY	TOTAL SHEETS	HEET NO.
582	60-(1,2,3,4)WRS-1	MADISON	2	1
		CONTRACT NO.		

SCALE: SHEET 1 OF 2 SHEETS STA. TO STA. ILLINOIS FED. AID PROJECT





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PLOT DATE = \$DATE\$	DATE -	REVISED -

STATE OF ILLINOIS
DEPARTMENT OF TRANSPORTATION

ALTERNATIVE 6
ROUNDABOUTS ON ROUTE 66

F.A.P. RTE.	SECTION	COUNTY	TOTAL SHEETS	HEET NO.
582	60-(1,2,3,4)WRS-1	MADISON	2	2
		CONTRACT NO.		

Appendix B

Assessment of Effects



Illinois Department of Transportation

Memorandum

To: Brad H. Koldehoff
From: Elizabeth L. Roman, IDOT Architectural Historian
Subject: I-270, Chain of Rocks Canal to IL 57
Assessment of Effects to Historic Route 66
Date: April 15, 2020

Madison County
FAI 270, I-270, Chain of Rocks Canal to IL 157
Interstate Highway and Interchange Improvements
Section # 60-(1,2,3)WRS-1
IDOT Sequence # 21524/21524A
SHPO Log #014013120

Introduction and Project Description:

This undertaking involves improvements to IL-270 between west of Chain of Rocks canal and the IL 157 interchange, including additional lanes, interchange reconstruction, and adjoining roadway improvements. Based on a narrative description of the proposed work and mapping of the ESR Survey Limits and historic properties, the Illinois State Historic Preservation Office concurred on our finding of No Adverse Effect to historic properties on March 6, 2020, conditioned on continued consultation with their office.

Since concurrence was received, the draft Phase I (preliminary) design plans for the first phase of the undertaking have been completed by IDOT District 8. As part of the proposed reconstruction of the interchange at IL-111, improvements are also proposed to Chain of Rocks Road (Historic Route 66). This design has triggered our re-review of this undertaking for its effect to this section of Historic Route 66. The Area of Potential Effect (APE) is unchanged, as all the proposed work falls within the limits provided to the SHPO.

Historic Route 66 and Associated Resources in the APE and Vicinity:

Historic Route 66 from the Chain of Rocks Canal to IL 157 was determined eligible for listing on the National Register of History Places (NRHP) with this project in March 2020, in consultation with the SHPO and the Route 66 Road Ahead Partnership. This section of Route 66 was built between 1926 and 1936 and extends for 10.2 miles from IL 157 northwest of Glen Carbon to the Mississippi River Bridge at Chain of Rocks. In 1957, Route 66 was rerouted on four-lane highway to the south, and this section was redubbed Bypass Route 66. It was built as a two-lane rural highway with 18-20 foot wide paving, graveled shoulders, and roadside ditches.

Within the APE, Historic Route 66 runs parallel to and north of I-270, crossing through the APE where the APE extends northwards along roads with interchanges to be improved with the undertaking. The roadway has been repaved multiple times, with portions near IL 111, IL 228, and IL 3 reconstructed with wider through lanes, turn lanes, and paved shoulders. Three small portions of this section of Route 66 have been lost; two sections west of IL 203 have been removed, and one section rerouted at the I-255/IL 255 interchange. At IL 111, the roadway has been reconstructed 1400 feet east and 900 feet west of the intersection. Turn lanes have been added here, resulting in a 4-5 lane wide cross-section, not similar to the historic design of this Route 66 section.

The Historic Route 66 Corridor Study (Barton & Associates 1995), Route 66 in Illinois MPDF (Serratt et al. 1997), Route 66 National Historic Context Study (Cassity 2004), and the Route 66 Nationwide MPDF (NPS et al. 2011), all note that eligibility under Criterion C requires that the extant roadway retain a high degree of design, materials and workmanship, i.e. retain its historic cross section, roadway profile, drainage ditches, and bridges. Given the current condition of Historic Route 66 in the vicinity of and crossing the APE, it would be NRHP eligible only under Criterion A for its association with cross-county, long distance, or leisure automobile travel during the mid-20th century and for its association with popular culture of Route 66. Its period of significance extends from its construction in 1926 through its loss of Federal highway designation in 1965.

Surveys of Historic Route 66 and its associated resources were conducted for IDOT in 1994 in conjunction with the Corridor Study (Barton-Aschman & Associates 1995), and in 2013 in conjunction with the Chicago to St. Louis High Speed Rail project (Vogel 2013). Associated resources, or those built in direct connection with the highway include: gas/service stations and garages/auto repair facilities; motels, tourist courts/cabins, and tourist camps/campgrounds; diners, cafes and restaurants; general stores and souvenir shops; and billboards and tourist signs. In Illinois, these also include 'Rural Route 66 Historic Districts' which are defined as collections of associated and complementary structures along Route 66 that recall the motoring experience during the period of significance (IL MPDF 1997).

Within the APE, one Route 66 associated resource was identified during the historic resources inventory and determined NRHP eligible, the Midway Motel (HR 63-A, #412). All other extant associated resources along this section of Historic Route 66 fall outside of the APE, as shown on the attached Historic Properties & Route 66 Map Set. Several have been lost since 2013, including the Belair Drive-In Neon Sign in the just west of IL 111 within the APE. A Rural Route 66 Historic District is not present along this section of Historic Route 66 due to the amount of post 1970 infill along the corridor. At IL 111, associated resources have been replaced by modern gas stations, truck stop, and industrial park. In Mitchell, east of IL 203, post 1970 businesses line the roadway and flank the extant period resources. Lastly, multiple 1960s through 1980s residential subdivisions associated are sited along this section of Route 66 that are associated with post WW II suburban growth not long distance travel. The landscape east I-255 and west of IL 3 retains more integrity, as there is little to no post 1965 infill development at these locations which remain rural in character.

Assessment of Effect to Historic Route 66:

The effects of the undertaking on surrounding historic properties has been evaluated though application of the Criteria of Adverse Effect at 36 CFR 800.5(a)(2). An adverse effect occurs when an undertaking alters, directly or indirectly, any of the characteristics of an historic property that qualify it for inclusion on the NRHP, in a manner that diminishes its integrity, including indirect effects that change the historic character, use, or setting of the historic property. The adverse effect may be direct through physical destruction or damage to part or all of the property, alteration of the property, removal/relocation or neglect of the property, or where applicable transfer out of Federal ownership or control. Or the adverse effect may be indirect through changes to the character or use of its character-defining setting, or through introduction of visual, atmospheric or audible elements that alter or diminish the integrity of its character defining elements.

The final design and construction of this proposed undertaking to add lanes and improve interchanges of I-270 will be staged, with the initial stage to include all work from Chain of Rocks Canal to east of IL 111. The effects of this phase can be assessed at this time using the Phase I (preliminary) design. The effects to the eastern half of the undertaking cannot be reassessed, as needed, until this phase of the work is carried forward by IDOT.

The proposed work to I-255 itself will all be within the right-of-way and involve widening of existing interstate highway and realignment and widening of its interchange ramps. The setting south of Historic Route 66 currently contains an interstate, and the landscape will not be changed to a new use or condition. As such, this part of the proposed work will have no effect to Historic Route 66 or any of its associated resources including the Midwest Motel.

However, work proposed to upgrade Chain of Rocks Road at IL 111 will directly alter and cause physical destruction of Historic Route 66. As shown on the draft Phase I design exhibits, the Historic Route 66 roadway will be widened from two to four lanes for +/-3150 feet (0.6 mile), across its intersection with IL 111. New roundabouts are proposed, one each direction of the intersection. At the eastern roundabout, the centerline of Chain of Rocks Road will be realigned to curve the north. At the intersection, Chain of Rocks Road will be widened from two to six lanes and IL 111 will also be widened from a four to eight lanes, all to accommodate multiple through lanes and left and right turn lanes in all directions. Though repaving and minor widening can occur to Historic Route 66 without removing its integrity and eligibility under Criterion A (IL MPDF 1997, Nationwide MPDF 2011), adding non-historic elements like roundabouts and curving centerlines will alter character defining elements of the historic roadway. The proposed design for Chain of Rocks Road including additional lanes, roundabouts, and shifted centerline collective cause an adverse effect to Historic Route 66.

Before choosing this design, IDOT District 8 considered multiple design alternatives for IL 111's interchange with I-270 interchange and its intersection with Chain of Rocks Road (Historic Route 66). The presence of a truck stop and an industrial park at the intersection requires design that can accommodate semi-trailer truck traffic in addition to other vehicular traffic. Other alternatives that did not involve the roundabouts required a widening Chain of Rocks Road (Historic Route 66) to six lanes. Removal of the centerline shift at the roundabout east of IL 111 required extensive right-of-way acquisition from commercial properties, including the truck stop. The chosen design is most efficient and requires the least amount of right-of-way with lowest impact to commercial properties at the intersection.

Given the above analysis, this undertaking will have an adverse effect to Historic Route 66. The effects of future phases of this undertaking must be re-evaluated once Phase I (preliminary) design is available.

If there are any questions concerning this finding of effects to above-ground historic properties, please contact me at Elizabeth.Roman@illinois.gov or 217-558-4752.

Sources Consulted:

Barton-Aschman Associates, Inc., with Archaeological Research, Inc. *Historic Route 66 Corridor Study*. Report prepared for the Illinois Department of Transportation, Springfield, IL. August 1995.

Cassity, Michael. *Route 66 Corridor National Historic Context Study*. Report prepared for the Route 66 Corridor Preservation Program, National Trails System Office, National Park Service, Santa Fe, NM, August December 2004.

Google Earth. USDA, USGS and Landsat Historic Aerial Photographs Viewer, 1998 to 2015.

Illinois Official State Highway or Road Maps. State of Illinois, Springfield, IL, 1917 through 1980. Illinois State Highway Maps collection, Illinois Digital Archives.

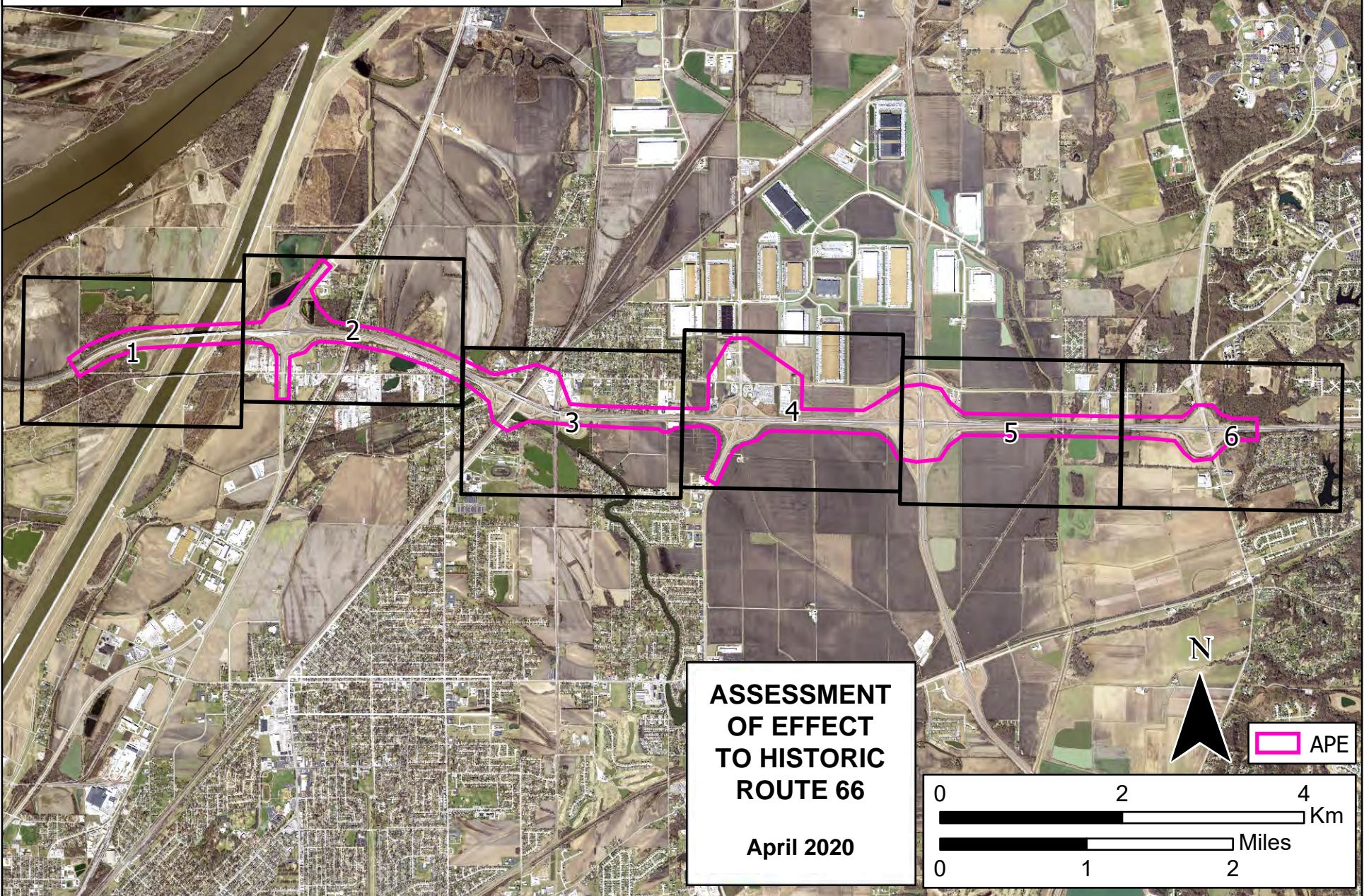
National Park Service, Michael Cassity, and Thomason & Associates. *Historic Properties Associated with U.S. Highway 66, from Chicago to Santa Monica, 1926 to 1985*. National Register of Historic Places Multiple Property Documentation Form (MPDF) prepared for the Route 66 Corridor Preservation Program, Santa Fe, NM, August 2011.

Seratt, Dorothy R. L. and Terri Ryburn-Lamont. *Historic and Architectural Resources of Route 66 Through Illinois*. National Register of Historic Places Multiple Property Documentation Form (MPDF) prepared for the Route 66 Association of Illinois, Odell, IL, August 1997.

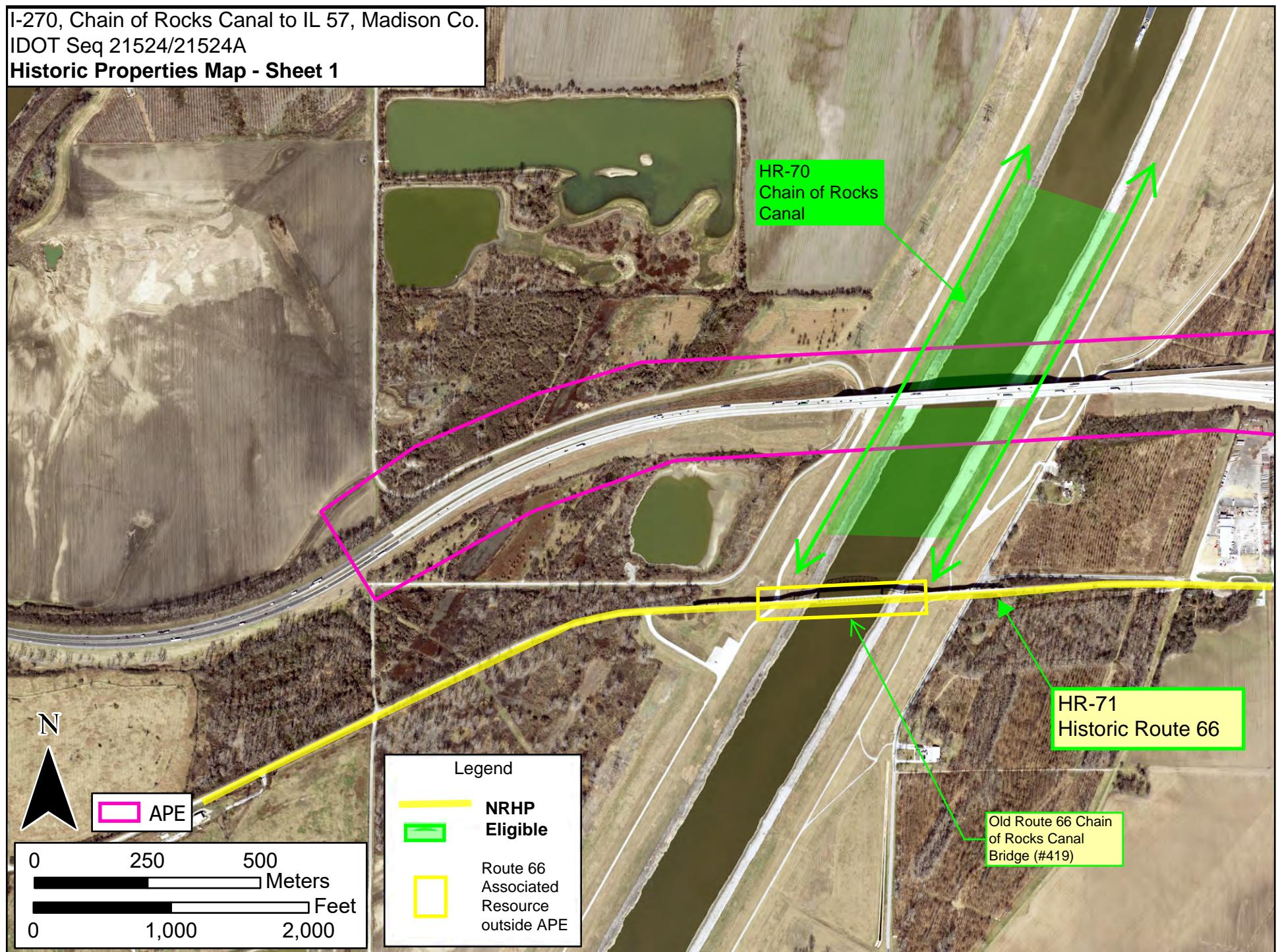
Vogel, John N. *Route 66 in Illinois [Corridor Study]: 2012/2013 Update and Expansion of the Original 1994/1995 Survey*. Report prepared as part of the Chicago to St. Louis High Speed Rail Project by Heritage Research, Ltd., for the Illinois Department of Transportation, Springfield, IL. December 2013.

Williams, Laura E. *Historic Resources Inventory, FAI 207 / I-270 Improvements, Chain of Rocks Canal to IL 157, Madison County, Illinois*. Report prepared by the Illinois State Archaeological Survey for the Illinois Department of Transportation, Springfield, IL. January 2020.

I-270, Chain of Rocks Canal to IL 57, Madison County
IDOT Seq 21524/21524A
Historic Properties Maps - Key Sheet



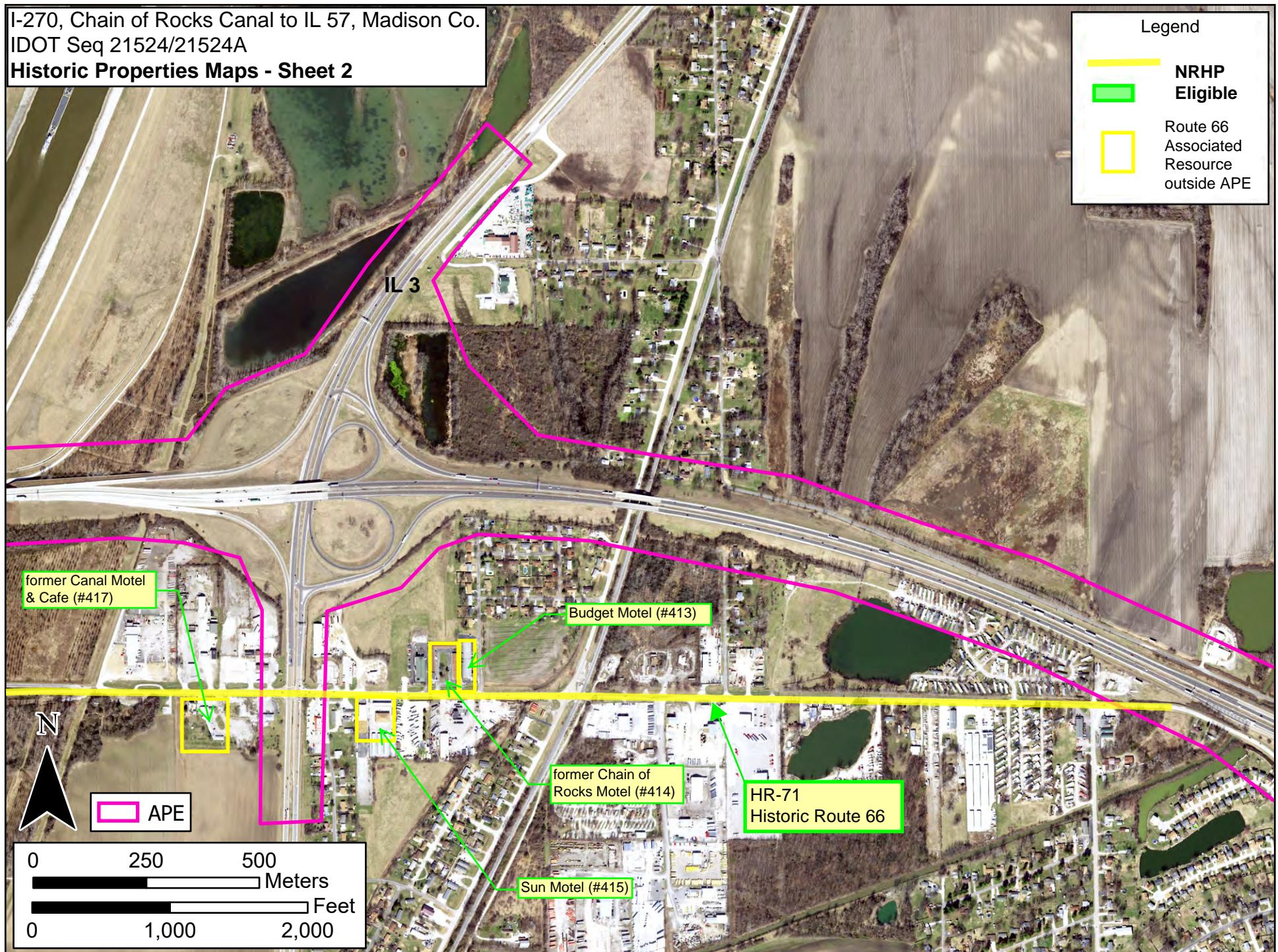
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IDOT Seq 21524/21524A
Historic Properties Map - Sheet 1

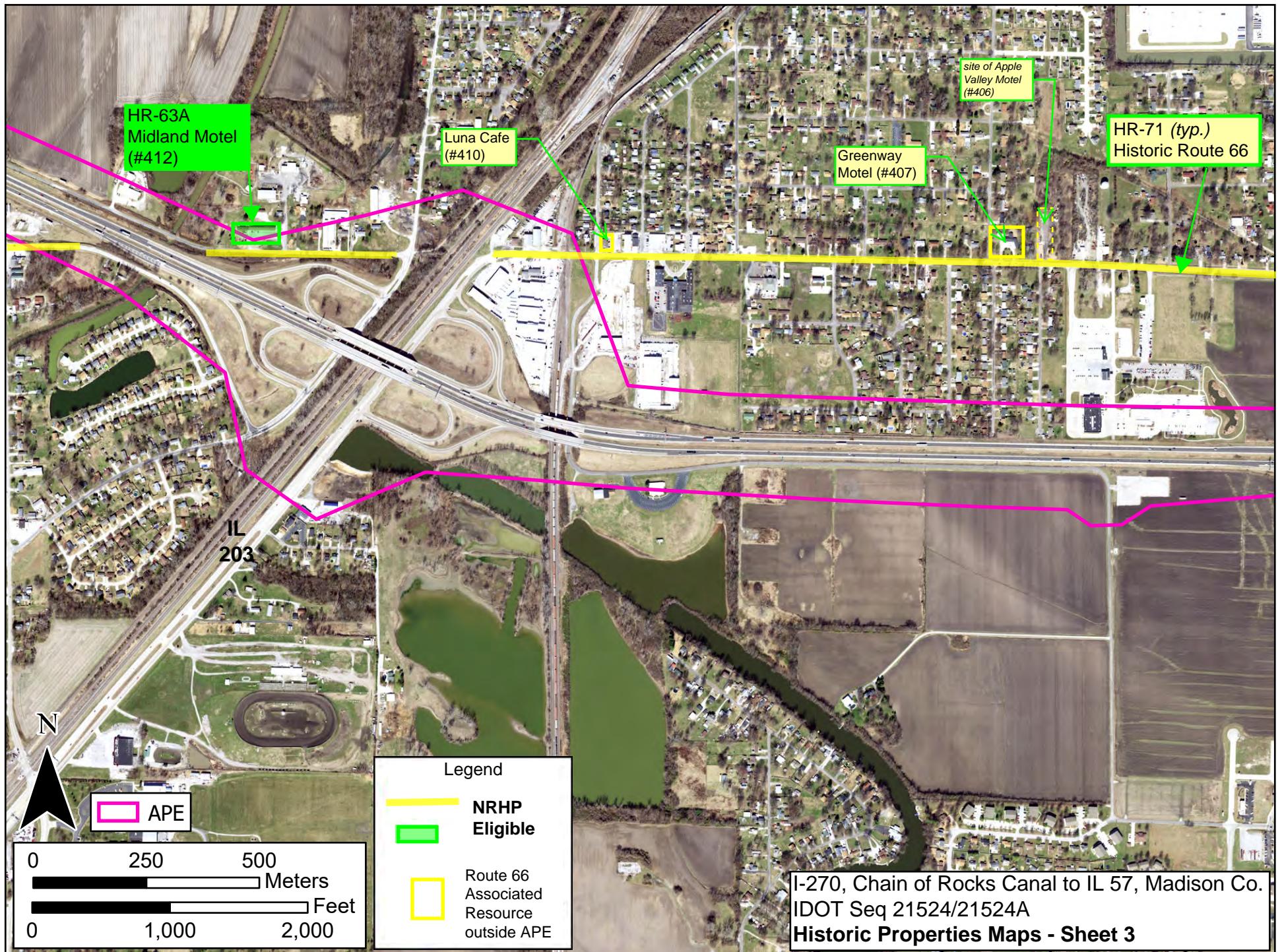


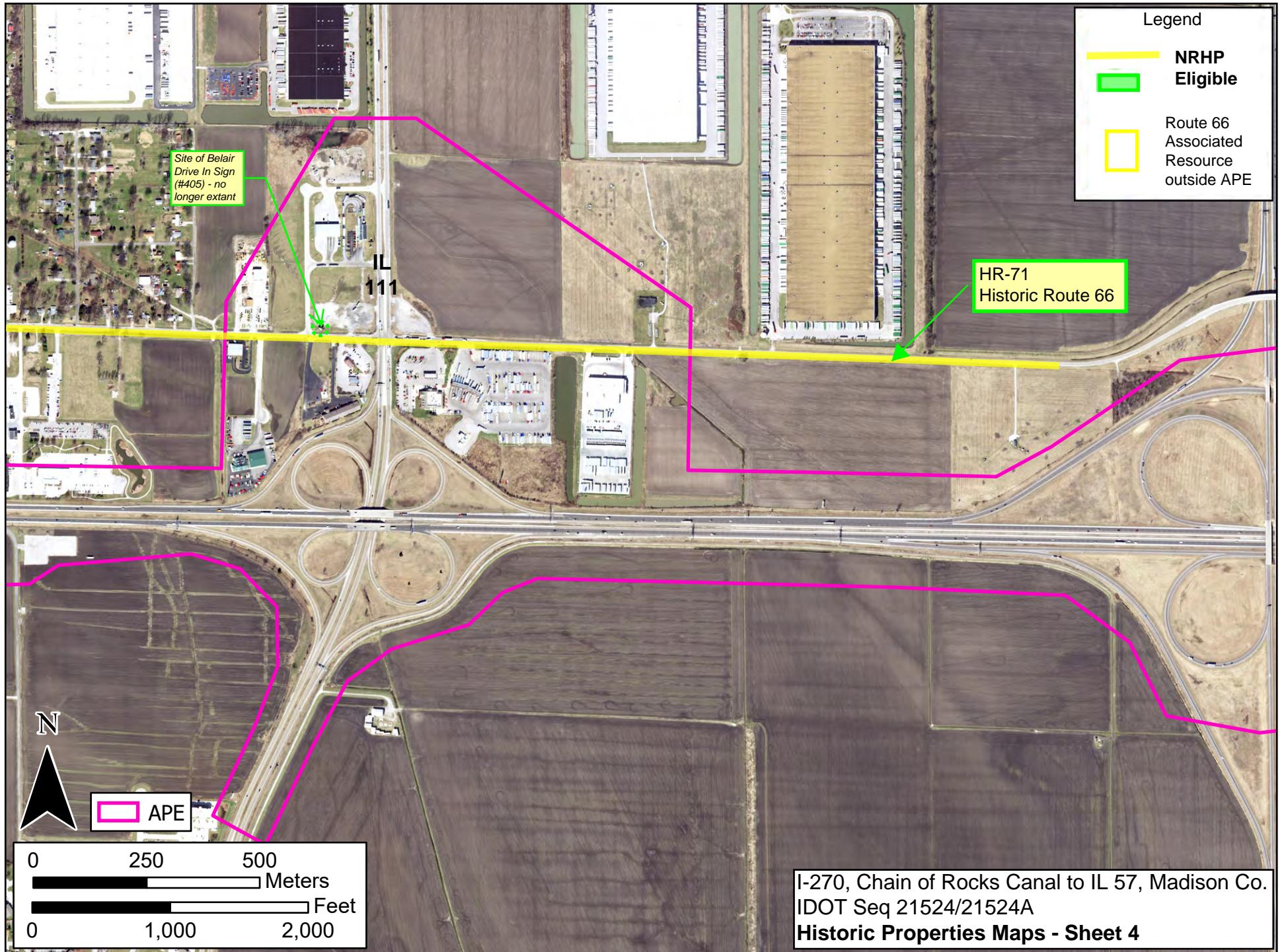
I-270, Chain of Rocks Canal to IL 57, Madison Co.

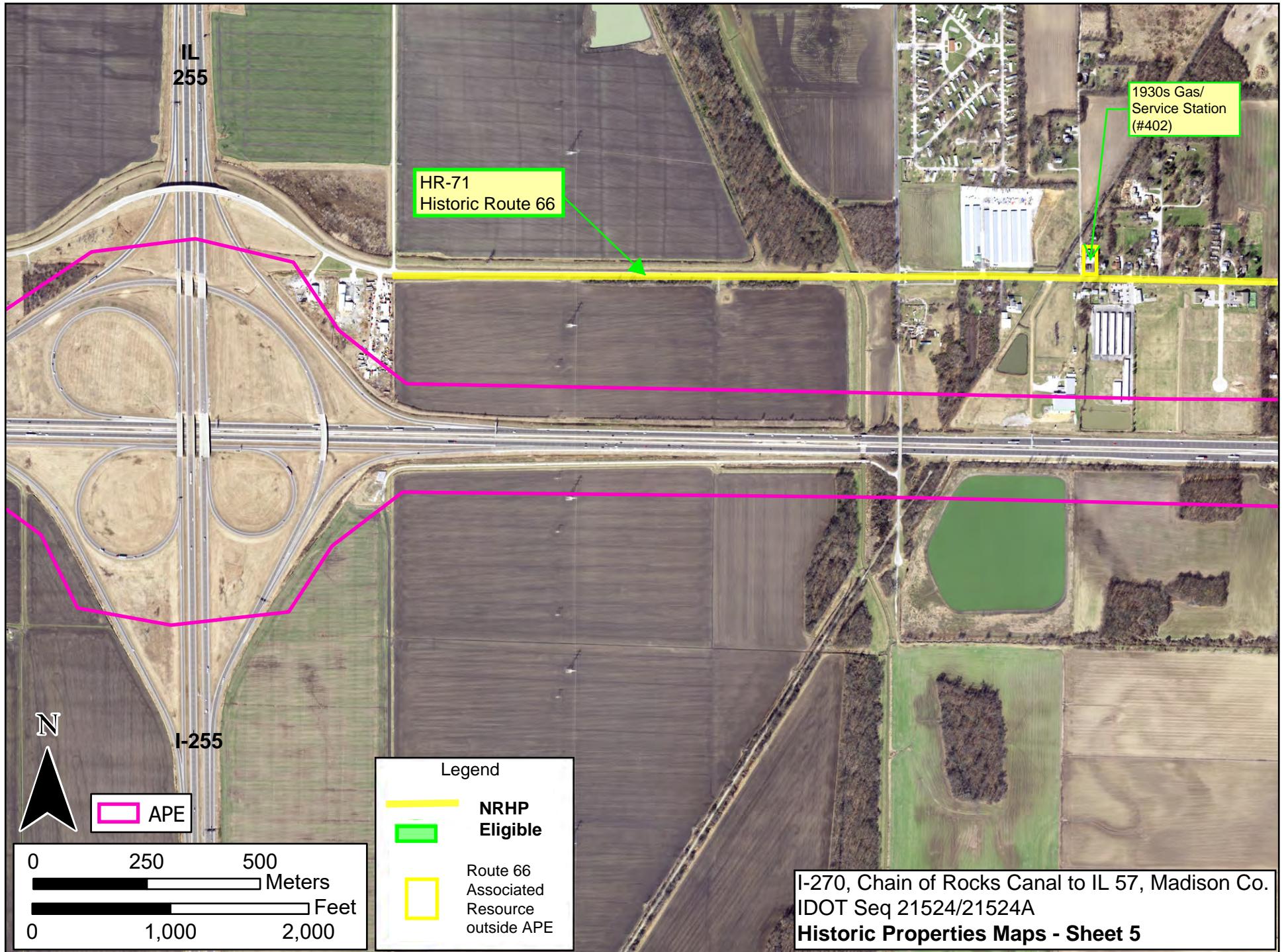
IDOT Seq 21524/21524A

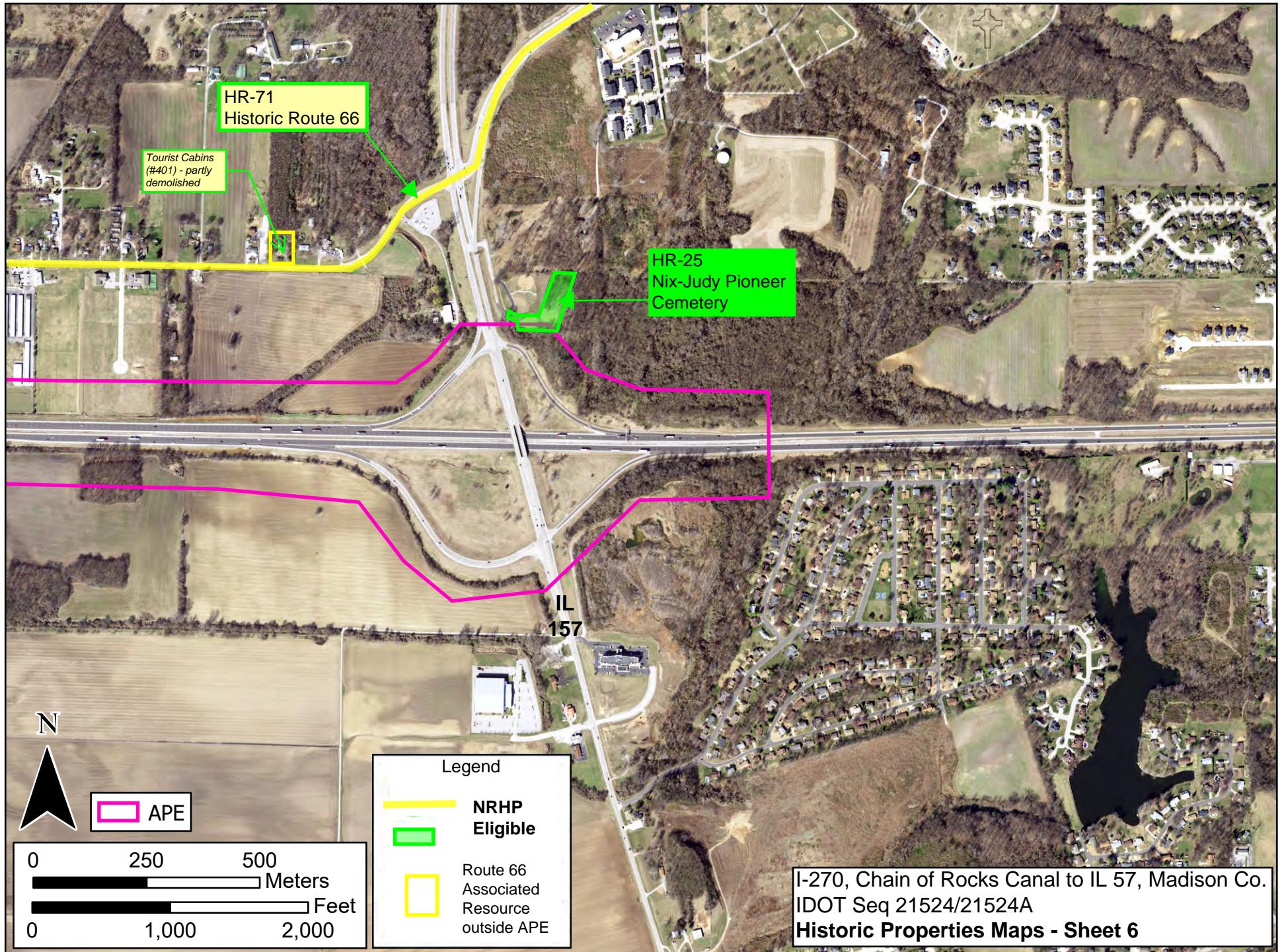
Historic Properties Maps - Sheet 2



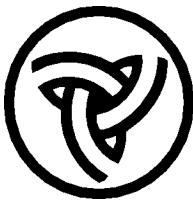








Appendix C
SHPO Coordination



Illinois Department of Transportation

2300 South Dirksen Parkway / Springfield, Illinois / 62764

January 31, 2020

**Madison County
Mitchell
FAI 270, I-270, Chain of Rocks Canal to IL 157
Interstate Highway Improvements
IDOT Sequence #21524, 21524A
ISAS Log #19112, 19111, 18034**

FEDERAL – SECTION 106 PROJECT

Conditional No Adverse Effect

Ms. Carol J. Wallace
Cultural Resources Coordinator
Illinois State Historic Preservation Office
Illinois Department of Natural Resources
1 Old State Capitol Plaza
Springfield, Illinois 62701

Dear Ms. Wallace:

The above referenced undertaking concerns improvements to I-270 in Madison County, between just west of the Chain of Rocks Canal to just east of the IL 157 interchange. The Illinois Department of Transportation (IDOT), in coordination with the Federal Highway Administration (FHWA), plans to add lanes and improve interchanges. The work will be confined to existing right-of-way (ROW), but limited slivers of new ROW may be needed; no displacements are anticipated. A review of potential impacts to historical, architectural, and archaeological properties within the 1,229-acre Area of Potential Effects (APE) was completed by IDOT's Cultural Resources staff, with the assistance of Illinois State Archaeological Survey (ISAS) personnel.

Architectural resources were identified by ISAS architectural history staff, resulting in the attached Historic Resource Inventory report. The report provides the definition of the APE, methodology, inventory table, photographs, and maps showing the inventoried architectural resources. Three National Register of Historic Places (NRHP) listed, eligible, or potentially eligible above-ground resources were identified: (1) Nix/Judy Pioneer Cemetery (NRHP Eligible), (2) Chain of Rocks Canal (NRHP Eligible), and (3) Route 66 (Warrants NRHP Consideration).

The Nix/Judy Pioneer Cemetery, which extends into the APE, is protected by the Illinois Human Skeletal Remains Protection Act (20 ILCS 3440, 17 IAC 4170) and will not be affected by the undertaking. Based on the nature and location of the proposed work, the undertaking will not adversely affect the Chain of Rocks Canal or Route 66. Only small sections of Route 66 fall within the APE, and the proposed work only touches Route 66 at intersection improvements. Thus, the undertaking will have no adverse effect to above-ground historic properties.

Archaeological resources were identified by ISAS archaeological staff, resulting in the attached Archaeological Survey Short Report (ASSR). In total, 25 sites fall entirely or partially within the APE. Of these, 11 are NRHP eligible or warrant NRHP consideration: 11MS30, 41, 52, 54, 104, 680, 906, 1364, 1365, 2528, and 2529. Three sites are given special consideration because they have mounds and/or possible human burials (11MS30, 41, and 104). Of these three, the Mitchell site (11MS30) is a major Mississippian Culture, Cahokia-related ritual and residential center. It warrants special attention because in the early 1960s it was extensively impacted by and largely incorporated into the I-270 roadway and ROW.

Although the undertaking, as currently designed, will involve limited ground disturbance, with most improvements made with the addition of fill, IDOT plans to investigate the remnants of the Mitchell site within I-270 ROW, where feasible given highway safety policies and procedures. The planned investigations, and the subsequent report, not only will help to remedy previous site impacts from original interstate construction but also will help in the development of a preservation plan for the site area within IDOT ROW. The preservation plan will be developed in consultation with your office, as well as with interested federally recognized American Indian Tribes. The goal of the plan will be to ensure potential future site impacts are avoided or minimized.

Therefore, in coordination with FHWA, IDOT requests the concurrence of the State Historic Preservation Officer (SHPO) in our finding of No Adverse Effect, provided that (1) IDOT continues consultation with the SHPO as refined plans become available and efforts are made by IDOT to avoid or minimize potential impacts to archaeological and architectural resources, and (2) IDOT develops a preservation plan for the Mitchell site based on investigation results from this undertaking and those from previous investigations.

Moreover, IDOT plans to complete the highway improvements in a staged manner. The first area targeted for improvement is the I-270/IL111 interchange. In accordance with 36 CFR Part 800.4(b)(2), FHWA and IDOT request the concurrence of the SHPO with our plan to consult regarding effects to historic properties in a staged approach.

In accordance with 36 CFR Part 800.3(c)(4), FHWA and IDOT will proceed to the next step in the Section 106 process if we do not receive a written response from your office within 30 days.

Sincerely,



Brad H. Koldehoff
Cultural Resources Unit Chief
Bureau of Design & Environment

Cc: Anne Haaker, IL Route 66 Scenic Byway and Route 66 Road Ahead Partnership



Illinois Department of Natural Resources

JB Pritzker, Governor

Colleen Callahan, Director

www.dnr.illinois.gov

Mailing address: State Historic Preservation Office, 1 Old State Capitol Plaza, Springfield, IL 62701

Madison County

PLEASE REFER TO: SHPO LOG #014013120

Mitchell

I-270 between Chain of Rocks Canal & IL 157, Sections - 25-35, 36-Township:4N-Range:9W, Section:31, 32-Township:4N-Range:8W

Sites: 11MS30, 41, 104

Sites: 11MS52, 54, 680, 906, 1364, 1365, 2528, 2529

Sites: 11MS55, 181, 613, 670, 1767, 1768, 2524, 2525, 2526, 2527, 2531, 2532, 2536, 2552

Chain of Rocks Canal - Upper Mississippi River Miles 184.1 to 194.2, Mitchell

Hotel/Motel at 912 Thorngate Road (Route 66), Granite City

Nix/Judy Pioneer Cemetery - East side of North Bluff Road/IL Route 157, Glen Carbon

Route 66 - From the West side of the Chain of Rocks Canal to East of IL Route 157, Mitchell to Glen Carbon

IDOT Seq #-21524 21524A, IDOT/ISAS#-19112 19111 18034

Interstate highway improvements

March 6, 2020

Brad Koldehoff

Illinois Department of Transportation

Bureau of Design and Environment

2300 S. Dirksen Parkway, Springfield, IL 62764

Dear Mr. Koldehoff:

Thank you for requesting comments from our office concerning the possible effects of the referenced project on cultural resources. Our comments are required by Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties".

Our staff has reviewed the specifications and assessed the impact of the project as submitted by your office. We have determined, with the following conditions, that this project, as proposed, will have no adverse effect on any Historic Properties.

1. Archaeology - Sites 11MS30, 41 & 104 are eligible for listing on the National Register and should be avoided; Sites 11MS 52, 54, 680, 906, 1364, 1365, 2528, 2529 are potentially eligible and should be either avoided or tested before any construction activity commences.
2. Architecture - The Nix/Judy Pioneer Cemetery is eligible for listing on the National Register of Historic Places (NRHP) under Criteria D. The Chain of Rocks Canal is eligible for listing on the NRHP under Criteria A and Criteria C. The portion of Route 66 between the West side of the Chain of Rocks Canal to East of IL Route 157 between Mitchell and Glen Carbon is eligible for listing on the NRHP under Criteria A. The hotel/motel at 912 Thorngate is eligible for listing on the NRHP under Criteria A.

If you have further questions, please contact Jeff Kruchten, Chief Archaeologist at 217/785-1279 or Jeffery.kruchten@illinois.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "Robert F. Appleman".

Robert F. Appleman

Deputy State Historic

Preservation Officer



Illinois Department of Transportation

2300 South Dirksen Parkway / Springfield, Illinois / 62764

April 17, 2020

**Madison County
Mitchell
FAI 270, I-270, Chain of Rocks Canal to IL 157
Interstate Highway Improvements
IDOT Sequence #21524, 21524A
ISAS Log #19112, 19111, 18034
SHPO Log #014013120**

FEDERAL – SECTION 106 PROJECT

Adverse Effect – Historic Route 66

Ms. Carol J. Wallace
Cultural Resources Coordinator
Illinois State Historic Preservation Office
Illinois Department of Natural Resources
1 Old State Capitol Plaza
Springfield, Illinois 62701

Dear Ms. Wallace:

In ongoing consultation with your office regarding the above referenced undertaking, the Illinois Department of Transportation (IDOT) in coordination with the Federal Highway Administration (FHWA) will have an adverse effect to Historic Route 66/Chain of Rocks Road. This resource, within the Area of Potential Effects (APE), has been determined eligible for the National Register of Historic Places (NRHP).

The I-270 undertaking will be completed in stages, and accordingly, the assessment of effects to historic properties will be completed in stages. The first stage to be completed involves improvements to the interchange of I-270 and Route 111 and the intersection of Route 111 and Historic Route 66. To accommodate current and future traffic, especially commercial truck traffic, on Historic Route 66, two roundabouts are planned for construction: one east of Route 111 and one west of Route 111.

The planned construction of the roundabouts will cause an adverse effect to Historic Route 66, see attached assessment of effects analysis. Therefore, in coordination with FHWA, IDOT requests the concurrence of the State Historic Preservation Officer (SHPO) in our finding of Adverse Effect to this section of Historic Route 66.

As future stages of the undertaking are funded, effects to historic properties will be assessed in consultation with the SHPO, Illinois Route 66 Scenic Byway, and American Indian Tribes who have expressed interest in the undertaking. In recent consultation with FHWA and Illinois Route 66 Scenic Byway, the following proposed mitigation measures for Historic Route 66 have been developed: (1) coordinate construction schedules for Historic Route 66 with Illinois Route 66

Scenic Byway, (2) coordinate adequate detour signage for Historic Route 66 with Illinois Route 66 Scenic Byway, and (3) install an interpretative Route 66 kiosk near the intersection of Route 111 and Historic Route 66 in coordination with Illinois Route 66 Scenic Byway.

Please concur with these proposed mitigation measures for Historic Route 66. Currently, a draft memorandum of agreement (MOA) is being developed and will be submitted for SHPO review.

In accordance with 36 CFR Part 800.3(c)(4), FHWA and IDOT will proceed to the next step in the Section 106 process if we do not receive a written response from your office within 30 days.

Sincerely,



Brad H. Koldehoff
Cultural Resources Unit Chief
Bureau of Design & Environment

Cc: Anne Haaker, IL Route 66 Scenic Byway, Road Ahead Partnership



Illinois Department of Natural Resources

One Natural Resources Way Springfield, Illinois 62702-1271
www.dnr.illinois.gov

Mailing Address: 1 Old State Capitol Plaza, Springfield, IL 62701

JB Pritzker, Governor
Colleen Callahan, Director

FAX (217) 524-7525

Madison County
Mitchell

Interstate highway improvements

I-270 between Chain of Rocks Canal & IL 157, Chain of Rocks Canal - Upper Mississippi River Miles 184.1 to 194.2, Mitchell; Hotel/Motel at 912 Thorngate Road (Route 66), Granite City; Nix/Judy Pioneer Cemetery - East side of North Bluff Road/IL Route 157, Glen Carbon, Route 66 - From the West side of the Chain of Rocks Canal to East of IL Route 157, Mitchell to Glen Carbon

IDOT Seq #-21524 21524A

SHPO Log #014013120

May 15, 2020

Brad Koldehoff
Illinois Department of Transportation
Bureau of Design and Environment
2300 S. Dirksen Parkway
Springfield, IL 62764

Dear Mr. Koldehoff:

We have reviewed the information provided regarding the above referenced project. Our review is required by section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties." This portion of Historic Route 66 was previously determined eligible for listing on the National Register of Historic Places under Criteria A.

We concur that this proposal to construct roundabouts on Historic Route 66, East and West of Route 111 constitutes an adverse effect as defined in 36 CFR 800.5.

However, we are not concurring to the proposed adverse effect mitigation for Historic Route 66 at this time. You should contact our office to initiate consultation to mitigate this adverse effect.

If you have any questions, please call Carol Wallace, Review and Compliance at 217/785-5027.

Sincerely,

A handwritten signature in black ink that reads "Robert F. Appleman".

Robert F. Appleman
Deputy State Historic
Preservation Officer

Appendix D
Draft MOA

DRAFT 95-19-2020

**MEMORANDUM OF AGREEMENT
AMONG
THE FEDERAL HIGHWAY ADMINISTRATION,
ILLINOIS DEPARTMENT OF TRANSPORTATION,
AND
ILLINOIS STATE HISTORIC PRESERVATION OFFICER,
REGARDING
IMPROVEMENTS TO INTERSTATE 270,
NEAR MITCHELL, MADISON COUNTY, ILLINOIS**

WHEREAS, the Illinois Department of Transportation (IDOT) plans to make improvements to Interstate 270 (I-270) near Mitchell in Madison County, Illinois (Project), IDOT Sequence #21524; and

WHEREAS, the Federal Highway Administration (FHWA) may fund the Project thereby making the Project an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA), 16 U.S.C. Section 470f, and its implementing regulations, 36 CFR Part 800; and

WHEREAS, the FHWA and IDOT have defined the undertaking's area of potential effects (APE) as the area shown in Exhibit A; and

WHEREAS, the FHWA and IDOT in consultation with the State Historic Preservation Officer (SHPO) have identified four (4) architectural resources, including Historic Route 66, also known as Chain-of-Rocks Road, and eleven (11) archaeological sites, including the Mitchell Mound Group (11MS30), that have been determined eligible for the National Register of Historic Places (NRHP) or warrant consideration for the NRHP (Exhibit B); and

WHEREAS, in accordance with 36 CFR Part 800.4(b)(2), the FHWA and IDOT in coordination with the SHPO shall implement a staged approach to assessing effects to historic properties, as IDOT secures funding and finalizes design options for each portion of the Project; and

WHEREAS, the FHWA and IDOT invited the following Tribes to enter consultation: Kaw Nation, Miami Tribe of Oklahoma, Osage Nation, Peoria Tribe of Indians of Oklahoma, Ponca Tribe of Oklahoma, and Quapaw Nation. Two Tribes agreed and are herein known as "Consulting Tribes": Miami Tribe of Oklahoma and Osage Nation; and

WHEREAS, the FHWA and IDOT informed the public about the Project in 2017 and 2018 through stakeholder meetings and press releases, and the Illinois Route 66 Scenic Byway, Route 66 The Road Ahead Partnership, and Great Rivers & Routes Tourism Bureau ~~has~~ joined as a consulting party; and

WHEREAS, the FHWA invited the IDOT to participate in consultation and to become a signatory to this MOA; and

WHEREAS, the FHWA and IDOT notified the Advisory Council on Historic Preservation (AChP) of the adverse effect in an email dated June 9*****, 2020, and the AChP declined to participate in a letter dated June 18*****, 2020; and

WHEREAS, execution and implementation of this MOA evidences that the FHWA has satisfied its Section 106 responsibilities for the Project; and

NOW, THEREFORE, the FHWA, IDOT, and SHPO agree that the Project shall be implemented in accordance with the following stipulations to ensure that potential effects on historic properties are taken into account.

STIPULATIONS

The FHWA, IDOT, and SHPO agree that the following steps will be undertaken for the Project:

I. ARCHAEOLOGICAL INVESTGATIONS

- A. Evaluation of Resources.** Additional archaeological surveys and test excavations shall be conducted by the IDOT in a staged fashion in coordination with the SHPO, FHWA, and Consulting Tribes to evaluate the NRHP eligibility of sites that may be adversely affected by the Project.
- B. Mitigation of Adverse Effects.** For those sites determined eligible for the NRHP, the IDOT in coordination with the SHPO, FHWA, and Consulting Tribes shall attempt to avoid and minimize potential impacts. When impacts cannot be avoided, data-recovery excavations shall be conducted by the IDOT. These investigations shall follow the data-recovery plans for prehistoric and historic era habitation sites listed in Exhibit C.
- C. Preservation of the Mitchell Mound Group (11MS30).** The Mitchell Mound Group was adversely impacted in the 1960s during the original construction of I-270, with mound and site remnants preserved within existing ROW. Although the Project, as currently designed, will involve limited ground disturbance, with most improvements made with the addition of fill and within existing ROW, the IDOT shall locate and investigate the remnants of the Mitchell Mound Group within the I-270 ROW, where feasible, given highway safety policies and procedures. The planned investigations, and the subsequent report, not only will help to document and remedy previous site impacts but also will help in the development of a preservation plan for the remnants within the IDOT ROW. The preservation plan shall be developed in consultation with the SHPO, FHWA, and Consulting Tribes. The goal of the plan will be to ensure potential future site impacts are avoided or minimized.

D. Human Remains. If human remains are discovered during the investigations covered by this MOA, the provisions of the Illinois Human Skeletal Remains Protection Act (20 ILCS 3440, 17 IAC 4170) and its rules (the Act), shall be followed. No excavation of human remains shall be performed except under the direction of a Certified Skeletal Analyst (17 IAC 4170.300(f)). Disposition of the remains and associated artifacts shall be accomplished as determined under the Act. If the remains are determined to be Native American, the provisions of the Memorandum of Understanding regarding Tribal Consultation Requirements for the Illinois Federal Transportation Program, effective September 19, 2011, shall be followed, and Tribes with an interest in Madison County shall be notified.

II. HISTORIC ROUTE 66 MITIGATION

A. Coordinate Construction Schedules. The IDOT shall furnish to the Illinois Route 66 Scenic Byway information about the location and timing of planned construction on Historic Route 66/Chain-of-Rocks Road. This information shall be provided as soon as feasible.

B. Adequate Detour Signage. For detours required during this Project, the IDOT, in consultation with the Illinois Route 66 Scenic Byway, shall develop adequate detour signage that safely and effectively returns travelers to Historic Route 66/Chain-of-Rocks Road as soon as feasible. At a minimum the detour signage shall include Route 66 signs.

C. Install "Ancient Route 66" Interpretative Sign at Chain-of-Rocks Bridge. The IDOT will develop and install an interpretative sign at the Chain-of-Rocks Bridge parking lot that shows the early alignments of Route 66 in the American Bottom region of the Mississippi Valley. It will explain how these and other highway alignments today retrace ancient Native American overland trails. These overland trails connected Cahokia Mounds and related settlements in the American Bottom with settlements in other regions and river valleys. The content of the sign will be developed in consultation with the SHPO, Illinois Route 66 Scenic Byway, and Consulting Tribes. For more detailed information and for directions to the nearby Cahokia Mounds State Historic Site, the sign will display a QR (Quick Response) code that will link the visitor via their mobile device to a GIS-based Story Map and/or video about Cahokia Mounds and "Ancient Route 66" alignments.

D. Develop Story Map and/or video about Cahokia Mounds and "Ancient Route 66" Alignments. The IDOT will develop a GIS-based Story Map and/or video about Cahokia Mounds and "Ancient Route 66" alignments in consultation with the SHPO, Illinois Route 66 Scenic Byway, and Consulting Tribes. The Story Map and/or video shall be accessible and compatible with common mobile devices. The link will be shared with

Cahokia Mounds State Historic Site, Illinois Route 66 Scenic Byways, and other interested parties.

E. Incorporate “Bird Man” Image into the Chain-of-Rocks Road Roundabouts. To help highlight the rich Native American heritage of the region, the IDOT will incorporate the Cahokia Mounds “Bird Man” image into the Chain-of-Rocks Road roundabouts. The image will be similar to those that adorn overpasses on I-255. Install Historic Route 66 Interpretative Kiosk. The IDOT, in consultation with the Illinois Route 66 Scenic Byway, SHPO, and FHWA, shall install a kiosk where feasible along Historic Route 66/Chain-of-Rocks Road within IDOT owned right of way, or a mutually agreed upon location, within the APE. The specific location, content, installation, and maintenance of the kiosk shall be determined through continued consultation.

Commented [KBH1]: Two image options have been developed: “Bird Man” or “Route 66 Sign”. FHWA will seek comments from Tribes about the two options.

III. PROFESSIONAL STANDARDS

For the purpose of implementing this MOA, the IDOT shall continue to employ departmental staff with qualifications that meet the requirements of 36 CFR Part 61, Appendix A. The IDOT shall ensure that the professional staff responsible for the implementation of the archaeological mitigation measures meet the requirements of 36 CFR Part 61, Appendix A.

IV. DURATION

This MOA will be null and void if its stipulations are not carried out within five (5) years from the date of its execution. In such an event, the FHWA shall so notify the parties to this MOA and, if it chooses to continue with the Project, then it shall reinitiate review of the Project in accordance with 36 CFR Part 800.

V. POST REVIEW DISCOVERIES

A. **Procedures for an Unanticipated Discovery of Human Remains and Burials.** In the case of an unanticipated discovery of human remains or burials on Federal land, the IDOT will follow the procedures outlined by the Native American Graves Protection and Repatriation Act, as amended (43 CFR 10, Subpart B), and pursuant to the Archaeological Resources Protection Act of 1979 (43 CFR 7). In the event of an unanticipated discovery of human remains or burials on non-Federal lands during the IDOT construction activities, the IDOT will comply with 20 Illinois Compiled Statutes 3440/0.01, et seq. (Human Skeletal Remains Protection Act) and follow these procedures:

(a) Upon encountering human remains or an unmarked human burial during ground disturbing construction activities, the IDOT will ensure that the construction contractor immediately stops work within a one hundred

fifty (150) foot radius from the point of discovery. The IDOT will ensure that the construction contractor implements interim measures to protect the discovery from vandalism and looting but must not remove or otherwise disturb any human remains or other items in the immediate vicinity of the discovery.

(b) Immediately following receipt of such notification, the IDOT will ensure that construction activities have halted within a one hundred fifty (150) foot radius from the point of discovery and assume responsibility for implementing additional measures, as appropriate, to protect the discovery from looting and vandalism until the requirements of state law have been completed.

(c) The IDOT will determine if the skeletal remains are human, the degree to which they were disturbed, and, if possible, assess their potential age and cultural affiliation without any further disturbance.

(d) The IDOT will notify the county coroner, Illinois Human Skeletal Remains Protection Act coordinator, and SHPO within forty-eight (48) hours of the discovery.

(e) Within seventy-two (72) hours after notification the county coroner will determine jurisdiction. If the remains are older than one hundred (100) years, the county coroner will notify the Human Skeletal Remains Protection Act coordinator and SHPO.

(f) The Human Skeletal Remains Protection Act coordinator is responsible for notifying the FHWA and IDOT within twenty-four (24) hours of its findings.

(g) If it is determined that intact or fragmented human remains are present the IDOT will consult with the Human Skeletal Remains Protection Act coordinator, SHPO, FHWA, and other interested parties regarding additional measures to avoid and protect or mitigate the adverse effect of the Project on the human remains and burial site. These measures may include:

- i. formal archaeological evaluation of the site;
- ii. if the remains are determined to be Native American, consultation with appropriate Tribes will be required;
- iii. visits to the site by the SHPO and other interested parties;
- iv. exploration of potential alternatives to avoid the human remains or burial;
- v. for Native American remains, implementation of a mitigation plan by the IDOT in consultation with

- appropriate Tribes, including procedures for disinterment and re-interment;
- vi. implementation of the mitigation plan; and
- vii. The FHWA approval to resume construction following completion of the fieldwork component of the mitigation plan.

B. Procedures for an Unanticipated Discovery of Historic Properties. In the event of an unanticipated discovery of historic properties during the IDOT construction activities, the IDOT will follow these procedures:

(a) The construction contractor must immediately stop all construction activity within a one hundred fifty (150) foot radius of the discovery, notify the IDOT of the discovery and implement interim measures to protect the discovery from looting and vandalism. Within forty-eight (48) hours of receipt of this notification of the discovery, the IDOT shall:

- i. inspect the work site to determine the extent of the discovery and ensure that construction activities have halted;
- ii. clearly mark the area of the discovery;
- iii. implement additional measures, as appropriate, to protect the discovery from looting and vandalism; and
- iv. notify the FHWA, the SHPO, and other interested parties of the discovery.

(b) The IDOT/FHWA will have seven (7) business days following notification to determine the National Register eligibility of the discovery after considering the filed comments of the SHPO and other interested parties. The IDOT/FHWA may assume the newly discovered property to be eligible for the National Register for the purposes of Section 106 pursuant to 36 CFR§ 800.13(c)

(c) If the find is determined to be potentially significant the IDOT will consult with the SHPO and other interested parties regarding appropriate measures for site treatment. For properties determined eligible for the NRHP, the IDOT/FHWA will notify the SHPO and other interested parties, of those actions for which it proposes to resolve adverse effects. The SHPO and other interested parties will have seven (7) business days to provide their views on the proposed actions to resolve adverse effects. These measures may include:

- i. formal archaeological evaluation of the site;
- ii. visits to the site by the SHPO and other interested parties;
- iii. exploration of potential alternatives to avoid the site;

- iv. preparation of a mitigation plan by the IDOT in consultation with other interested parties for approval by the SHPO;
- v. implementation of a mitigation plan; and
- vi. The FHWA approval to resume construction following completion of the fieldwork component of the mitigation plan.

(d) If the find is determined to be either isolated or completely disturbed by construction activities, the IDOT will consult with the SHPO and other interested parties prior to resuming construction.

(e) Dispute Resolution: The FHWA will seek and take into account the recommendations of the ACHP in resolving any disagreements that may arise regarding determination of effects.

VI. DISPUTE RESOLUTION

Should any signatory to this MOA object at any time to any actions proposed or the manner in which the terms of this MOA are implemented, the FHWA shall consult with such party to resolve the objection. If the FHWA determines that such objection cannot be resolved, the FHWA will:

- A. Forward all documentation relevant to the dispute, including the FHWA's proposed resolution, to the ACHP. The ACHP shall provide the FHWA with its advice on the resolution of the objections within thirty days (30) of receiving adequate documentation. Prior to reaching a final decision on the dispute, the FHWA shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP and signatories and provide them with a copy of this written response. The FHWA will then proceed according to its final decision.
- B. If the ACHP does not provide its advice regarding the dispute within thirty (30) days, the FHWA may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, the FHWA shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories to the MOA and provide them and the ACHP with a copy of such written response.
- C. The FHWA's responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remain unchanged.

VII. AMENDMENTS

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

VIII. TERMINATION

If any signatory to this MOA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other parties to attempt to develop an amendment. If within thirty days an amendment cannot be reached, any signatory may terminate the MOA upon written notification to the other signatories. Once the MOA is terminated and prior to work continuing on the undertaking, the FHWA must request, take into account, and respond to the comments of the ACHP under 36 CFR § 800.7. The FHWA shall notify the signatories as to the course of action it will pursue.

Execution of this MOA by the FHWA, SHPO, and IDOT, and the implementation of its terms evidence that the FHWA has taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment.

[Signature Pages Follow]

**MEMORANDUM OF AGREEMENT
AMONG
THE FEDERAL HIGHWAY ADMINISTRATION,
ILLINOIS DEPARTMENT OF TRANSPORTATION,
AND
ILLINOIS STATE HISTORIC PRESERVATION OFFICER,
REGARDING
IMPROVEMENTS TO INTERSTATE 270,
NEAR MITCHELL, MADISON COUNTY, ILLINOIS**

(Signatory)

FEDERAL HIGHWAY ADMINISTRATION

By: _____ Date: _____

Print Name: _____

Title: _____

**MEMORANDUM OF AGREEMENT
AMONG**
**THE FEDERAL HIGHWAY ADMINISTRATION,
ILLINOIS DEPARTMENT OF TRANSPORTATION,
AND**
**ILLINOIS STATE HISTORIC PRESERVATION OFFICER,
REGARDING**
**IMPROVEMENTS TO INTERSTATE 270,
NEAR MITCHELL, MADISON COUNTY, ILLINOIS**

(Signatory)

ILLINOIS STATE HISTORIC PRESERVATION OFFICER

By: _____ Date: _____

Print Name: Robert F. Appleman

Title: Deputy State Historic Preservation Officer

**MEMORANDUM OF AGREEMENT
AMONG
THE FEDERAL HIGHWAY ADMINISTRATION,
ILLINOIS DEPARTMENT OF TRANSPORTATION,
AND
ILLINOIS STATE HISTORIC PRESERVATION OFFICER,
REGARDING
IMPROVEMENTS TO INTERSTATE 270,
NEAR MITCHELL, MADISON COUNTY, ILLINOIS**

(Invited Signatory)

ILLINOIS DEPARTMENT OF TRANSPORTATION

By: _____ Date: _____

Print Name: _____

Title: _____

**MEMORANDUM OF AGREEMENT
AMONG
THE FEDERAL HIGHWAY ADMINISTRATION,
ILLINOIS DEPARTMENT OF TRANSPORTATION,
AND
ILLINOIS STATE HISTORIC PRESERVATION OFFICER,
REGARDING
IMPROVEMENTS TO INTERSTATE 270,
NEAR MITCHELL, MADISON COUNTY, ILLINOIS**

(Concurring Party)

ILLINOIS ROUTE 66 SCENIC BYWAY

By: _____ Date: _____

Print Name: _____

Title: _____

**MEMORANDUM OF AGREEMENT
AMONG
THE FEDERAL HIGHWAY ADMINISTRATION,
ILLINOIS DEPARTMENT OF TRANSPORTATION,
AND
ILLINOIS STATE HISTORIC PRESERVATION OFFICER,
REGARDING
IMPROVEMENTS TO INTERSTATE 270,
NEAR MITCHELL, MADISON COUNTY, ILLINOIS**

(Concurring Party)

MIAMI TRIBE OF OKLAHOMA

By: _____ Date: _____

Print Name: _____

Title: _____

**MEMORANDUM OF AGREEMENT
AMONG
THE FEDERAL HIGHWAY ADMINISTRATION,
ILLINOIS DEPARTMENT OF TRANSPORTATION,
AND
ILLINOIS STATE HISTORIC PRESERVATION OFFICER,
REGARDING
IMPROVEMENTS TO INTERSTATE 270,
NEAR MITCHELL, MADISON COUNTY, ILLINOIS**

(Concurring Party)

OSAGE NATION

By: _____ Date: _____

Print Name: _____

Title: _____