MEMORANDUM OF AGREEMENT
BETWEEN THE FEDERAL HIGHWAY ADMINISTRATION,
THE ILLINOIS STATE HISTORIC PRESERVATION OFFICER, AND
THE MISSOURI STATE HISTORIC PRESERVATION OFFICER,
FOR MITIGATION OF ADVERSE EFFECTS TO:

HISTORIC PROPERTIES: U. S. Highway 54 Bridge over the Mississippi River, also known as the Champ Clark Bridge (K0932), connecting Pike County, Illinois and the City of Louisiana, Pike County, Missouri

UNDERTAKING: To construct a new bridge over the Mississippi River, MoDOT Job Number J3P2209 and Illinois Sequence Number 17263

STATE: Missouri and Illinois

AGENCY: Federal Highway Administration

WHEREAS, the Missouri Department of Transportation (MoDOT) in coordination with the Illinois Department of Transportation (IDOT) plan to replace the U. S. Highway 54 bridge over the Mississippi River, known as the Champ Clark Bridge (K0932), which links Pike County, Illinois and the City of Louisiana, Pike County, Missouri (Project), MoDOT Job Number J3P2209 and ILDOT Sequence Number 17263; and

WHEREAS, the Federal Highway Administration (FHWA) has funded the Project, thereby making the Project an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA), 54 USC Section 302909, and its implementing regulations 36 CFR Part 800, and the Missouri Division of the FHWA (MoFHWA) is the lead agency for the project, working in conjunction with the Illinois Division of the FHWA (ILFHWA); and

WHEREAS, the MoFHWA and ILFHWA have defined the undertaking area of potential effects (APE) as the combined maximum footprint of the rehabilitation and build alternatives carried forward in the Environmental Assessment (EA) being conducted for the Project, plus an additional buffer of 100 feet for the consideration of direct and indirect effects, as shown in the attached Information to Accompany; and

WHEREAS, in Missouri the architectural and bridge survey identified several properties eligible for inclusion in the National Register of Historic Places (NRHP), as detailed in the attached Information to Accompany, including the Champ Clark Bridge (K0932); and the architectural and bridge survey in Illinois identified no historic buildings and only the Champ Clark Bridge as NRHP eligible, and

WHEREAS, the MoFHWA, ILFHWA, MoDOT and IDOT, in consultation with the Missouri State Historic Preservation Officer (MoSHPO) and the Illinois Historic Preservation Officer (ILSHPO) have determined that the replacement of the Champ Clark Bridge (K0932) will have an adverse effect on the bridge, which has been determined eligible for inclusion to the National Register of Historic Places (NRHP), and which is controlled by MoDOT; and

WHEREAS, the full impacts of this project on archaeological resources cannot be determined until the final design has been completed and access to private property currently within the project area granted; and
WHEREAS, the MoFHWA has notified the Advisory Council on Historic Preservation (Council) of its adverse effect determination (January 9, 2015) and the Council has chosen not to participate in this Memorandum of Agreement (MOA) (January 28, 2015); and

WHEREAS, the MoFHWA has invited Missouri Highways and Transportation Commission (MHTC), acting by and through the Missouri Department of Transportation (MoDOT), and the Illinois Department of Transportation (IDOT) to participate in the preparation of and be a signatory to this MOA; and

WHEREAS, the City of Louisiana, Missouri, the Louisiana, Missouri Historic Preservation Commission, Pike County, Illinois, HistoricBridges.org, the Historic Bridge Foundation, the Louisiana, Missouri Historic Preservation Association, the Pike County Missouri Historical Society and the Pike County Illinois Historical Society were invited to participate in consultation; and

WHEREAS, Pike County, Illinois, the Louisiana, Missouri Historic Preservation Association, HistoricBridges.org, and the Historic Bridge Foundation accepted the invitation to participate in consultation; and

WHEREAS, the MoFHWA and ILFHWA have determined that the following tribes have interest in the project area, and MoFHWA has notified them of the project (July 31, 2012) and invited them to participate in the agency scoping meeting: the Iowa Tribe of Kansas and Nebraska, the Sac and Fox Tribe of the Mississippi in Iowa, the Iowa Tribe of Oklahoma, the Kaw Nation, the Miami Tribe of Oklahoma, the Muscogee (Creek) Nation of Oklahoma, the Osage Nation, the Peoria Tribe of Oklahoma, the Ponca Tribe of Nebraska, the Sac and Fox Nation of the Missouri in Kansas and Nebraska, and the Sac and Fox Nation of Oklahoma; and

WHEREAS, the Osage Nation has commented on the archaeological survey in Illinois, including the need for deep testing when design has proceeded; and

WHEREAS, to the best of the MoFHWA’s knowledge and belief, no human remains, associated or unassociated funerary objects or sacred objects, or objects of cultural patrimony as defined in the Native American Graves Protection and Repatriation Act (25 U.S.C. 3001), are expected to be encountered; however, if encountered, in Illinois the provisions of the Illinois Human Skeletal Remains Protection Act (20 ILCS3440, 17 IAC 4170) will be followed; in Missouri, provisions of the Missouri Unmarked Human Burial Sites Act, (§§ 194.400-194.410 RSMo.) and the Cemeteries Law Act (§§ 214 RSMo.) will be followed; and

NOW, THEREFORE, MoFHWA, ILFHWA, MoDOT, IDOT, ILSHPO and MoSHPO agree that the undertaking shall be implemented in accordance with the following stipulations.

STIPULATIONS
MoFHWA and ILFHWA shall ensure that the following measures are carried out:

I. Architectural & Bridge Resources:
   A. The MHTC, acting by and through MoDOT, shall develop archival
documentation to the following specifications for the Champ Clark Bridge
(K0932):
      1. The bridge will be documented in accordance with Missouri *Levels of
         Bridge Documentation (State Level) for Section 106 Mitigation of
         Adverse Effect Level I*, including:
         a. Archival photographs, consistent with the NRHP and SHPO
            standards, shall be taken, with sufficient coverage to provide
            overall views of the bridge and significant details of the bridge.
            i. The MoSHPO will be consulted regarding the adequacy of
               coverage for the bridge and the selection of images prior to
               the removal of the bridge.
            ii. Photographs will be printed in an 8” X 10” format and
                labeled in a manner consistent with NRHP standards.
            iii. Original photographs and digital images on archival discs
                will be provided to the ILSHPO and MoSHPO and
                maintained by MoDOT.
         b. A copy of the as built construction plans shall be provided in
            printed and digital format. Rehabilitation plans shall be included in
            digital format.
         c. A historical narrative describing the planning for and construction
            of the Champ Clark Bridge, and any significant historic themes
            associated with the planning and construction of the Bridge, shall
            be prepared.
         d. A brief, reader-friendly bridge description shall be prepared,
            referencing the archival photographs and bridge plans.
         e. Copies of the documentation shall be provided to the ILSHPO, the
            MoSHPO, and at least one (1) library or historical society each
            in Pike County, Illinois and Louisiana, Missouri.
         f. A copy of the documentation shall be placed on-line through the
            MoDOT Library.
      2. The Champ Clark Bridge (K0932) shall be advertised as available for
         reuse, in accordance with MAP-21 and its successor transportation laws,
         and following the MoDOT *Bridge Marketing Plan for Relocating
         Historic Bridges* (2014, as amended), for a minimum period of eighteen
         (18) months (July 1, 2015-December 31, 2016).
         a. If a proposal(s) is received for reuse of the bridge, MoDOT, IDOT,
            MoFHWA, ILFHWA, MoSHPO and ILSHPO shall evaluate the
            proposal to determine if it is viable and ensures the long-term
            preservation of the bridge. The viability of the proposal shall be
based on the relevant sections of the Proposal Checklist found on the MoDOT Free Bridges web-site.

i. If the proposal is viable, the recipient shall be given up to 80% of the demolition funds for the bridge to assist in the rehabilitation of the bridge.

ii. If the proposal is for reuse of part of the bridge, the demolition funds shall be pro-rated for the percentage of the bridge that is being retained.

b. If a third party does not come forward to take the bridge, the bridge plaques (three on each end of the bridge) shall be removed and given into the care of the MoDOT Historic Preservation Section until they can be transferred to the City of Louisiana and a Pike County, Illinois repository.

3. The MoDOT shall produce a documentary type video documenting the history and engineering of the Champ Clark Bridge. The video shall be provided to the MoSHPO, ILSHPO, IDOT, and local repositories.

4. The MoDOT shall produce and install an interpretive panel on the history and engineering of the Champ Clark Bridge for installation at the Riverview Park. Placement in the park shall be coordinated with the City of Louisiana.

a. If the Champ Clark Bridge is not reused in place or relocated, pieces of the bridge shall be incorporated into the base of the interpretive panel.

5. The MoDOT shall produce a brochure on Mississippi River Bridges for distribution through visitor’s centers and local attractions in counties bordering the Mississippi River.

6. MoDOT will pursue the feasibility of 3D (LIDAR) imaging of the bridge.

II. Archaeological Resources

A. The full impact of the Project on archaeological resources cannot be determined until a preferred alternate is selected and the alignment is designed. Until that time access to private property cannot be obtained to conduct archaeological surveys.

B. MoFHWA, ILFHWA, MoDOT and IDOT shall consult with the respective SHPO regarding the identification of archaeological resources, NRHP eligibility, findings of adverse effect, and appropriate mitigation measures. For sites of Native American origin, this consultation shall include tribes that have requested consulting party status.

1. Illinois Archaeological Investigations:

a. An archaeological survey of the Illinois portion of the APE completed by the Illinois State Archaeological Survey (ISAS) has resulted in the identification of six archaeological sites (11PK1910-1915). The Project, as currently designed, will not affect the known archaeological sites. However, geo-coring work
undertaken by ISAS has identified the potential for buried archaeological sites. Moreover, impacts to potential archaeological resources within the community of Pike have not been assessed. Therefore, when the final alignment in Illinois has been selected and access to impacted parcels has been secured, the FHWA and IDOT will ensure that investigations are undertaken to identify and evaluate archaeological resources.

b. If NRHP eligible sites are identified within the APE, every effort will be made to avoid and minimize adverse effects. If adverse effects cannot be avoided, data-recovery excavations will be the recommended mitigation measure.

2. Missouri Archaeological Investigations:
   a. MoFHWA shall ensure that an archaeological survey is conducted for the project’s identified archaeological APE. The area surveyed shall take into consideration areas of hazardous waste concerns.
   b. MoFHWA, in consultation with the MoSHPO shall evaluate the NRHP eligibility of all archaeological sites identified within the APE. If the site is of Native American origin, the consultation shall include the aforementioned tribes.
   c. MoFHWA shall consult with the MoSHPO and other consulting parties, to develop and evaluate alternatives or modifications to the undertaking that could avoid, minimize or mitigate project adverse effects on archaeological sites eligible for the NRHP.
   d. MoFHWA shall consult with the MoSHPO and other consulting parties, to develop an Archaeological Data Recovery Plan(s) to mitigate adverse effects on NRHP eligible archaeological sites that cannot be avoided.
   e. The MoFHWA recognizes that any human remains (other than from a crime scene) which may be discovered or excavated during data recovery operations in Missouri are located on state land, and are subject to the immediate control, possession, custody and jurisdiction of the MoSHPO, pursuant to the Missouri Unmarked Human Burial Sites Act, §§ 194.400 -194.410, RSMo. Any burial that is determined to be in a marked cemetery would then fall under the Cemeteries Law Act, §§ 214. RSMo. The MoFHWA shall monitor MoDOT's excavation and handling of any such human remains and associated or unassociated funerary objects, sacred objects or objects of cultural patrimony, to assure itself that these are handled, excavated or processed in accordance with the MoSHPO's instructions, and that the MoSHPO has actual physical as well as legal custody, possession and jurisdiction of those remains and other objects after MoDOT or any other persons or entities complete any analysis of the remains and objects...
authorized by the MoSHPO, and within twelve (12) months of their excavation, pursuant to §§ 194.400-194.410, RSMo, and pursuant to any provisions of the Native American Graves Protection and Repatriation Act applicable to such remains and artifacts found on non-federal lands.

C. The MoFHWA and ILFHWA shall ensure that a report(s) on the archaeological investigations conducted pursuant to this agreement is provided to the MoSHPO and the ILSHPO, and upon request to other interested parties.

D. MoFHWA and ILFHWA shall ensure that procedures to be used for the processing, analysis, and curation of collected materials must be in accordance with the Advisory Council's Section 106 Archaeology Guidance, the Secretary of the Interior's Standards and Guidelines for Archaeology and Historic Preservation, and currently accepted standards for the analysis and curation of archaeological remains.

E. The MoFHWA and ILFHWA shall ensure that a determination, finding or agreement is supported by sufficient documentation to enable any reviewing parties to understand its basis.

III. Within one (1) year after carrying out the terms of the MOA, the MoFHWA and ILFHWA shall provide to all signatories a written report regarding the actions taken to fulfill the terms of the agreement.

IV. If any signatory proposes that this agreement be amended, the MoFHWA and ILFHWA shall consult with the other parties of this agreement. Said amendment shall be in writing, governed in accordance with 36 CFR 800.6, and executed by all parties to the Memorandum of Agreement.

V. If any signatory determines the terms of the MOA cannot be carried out, the signatories shall consult to seek amendment. If the MOA is not amended any signatory may terminate it. If the MOA is terminated, the MoFHWA shall execute a new MOA or request the comments of the Council.

VI. Six (6) copies of this signed MOA will be provided, one to each signatory. One (1) signed copy will be transmitted to the Council for inclusion in their files.

VII. Failure to carry out the terms of this MOA requires that the MoFHWA again request the comments of the Council in accordance with 36 CFR Part 800. If MoFHWA or ILFHWA cannot carry out the terms of the agreement, it shall not take or sanction any action or make any irreversible commitment that may affect historic properties until such time as the Council has been given the opportunity to comment on the full range of project alternatives which might avoid or mitigate any adverse effects.

VIII. This agreement shall commence upon having been signed by the ILSHPO, MoSHPO, MoFHWA and ILFHWA and shall be null and void if its terms are not carried out within ten (10) years from the date of its execution, unless both FHWA and both SHPO agree in writing to an extension for carrying out its terms.

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MEMORANDUM OF AGREEMENT
BETWEEN THE FEDERAL HIGHWAY ADMINISTRATION,
THE ILLINOIS STATE HISTORIC PRESERVATION OFFICER, AND
THE MISSOURI STATE HISTORIC PRESERVATION OFFICER,
FOR MITIGATION OF ADVERSE EFFECTS TO:

HISTORIC PROPERTIES: U. S. Highway 54 Bridge over the Mississippi River, also known as the Champ Clark Bridge (K0932), connecting Pike County, Illinois and the City of Louisiana, Pike County, Missouri

UNDERTAKING: To construct a new bridge over the Mississippi River, MoDOT Job Number J3P2209 and Illinois Sequence Number 17263

STATE: Missouri and Illinois

AGENCY: Federal Highway Administration

Signed:

MISSOURI DIVISION FEDERAL HIGHWAY ADMINISTRATION:

By: [Signature] Date: 1/4/16

Title: Program Development Team Leader
FHWA  
Pike County, Illinois & Pike County, Missouri  
Champ Clark Bridge, K0932 Replacement  
MoDOT Job Number J3P2209 and Illinois Sequence Number 17263

MEMORANDUM OF AGREEMENT
BETWEEN THE FEDERAL HIGHWAY ADMINISTRATION,
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J3P2209 and Illinois Sequence Number 17263

STATE: Missouri and Illinois

AGENCY: Federal Highway Administration

Signed:

ILLINOIS DIVISION FEDERAL HIGHWAY ADMINISTRATION:

By: Jamie P. Pieland   Date: 12-7-2015

Title: Environmental Engineer
MEMORANDUM OF AGREEMENT
BETWEEN THE FEDERAL HIGHWAY ADMINISTRATION,
THE ILLINOIS STATE HISTORIC PRESERVATION OFFICER, AND
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STATE: Missouri and Illinois

AGENCY: Federal Highway Administration

THE MISSOURI STATE HISTORIC PRESERVATION OFFICE:

By: [Signature] Date: 12/11/15

Title: [Title]

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MEMORANDUM OF AGREEMENT
BETWEEN THE FEDERAL HIGHWAY ADMINISTRATION,
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STATE: Missouri and Illinois

AGENCY: Federal Highway Administration

THE ILLINOIS STATE HISTORIC PRESERVATION OFFICE:

By: ___________________________ Date: 12-17-15
Title: DSHPD

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BETWEEN THE FEDERAL HIGHWAY ADMINISTRATION,
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STATE: Missouri and Illinois

AGENCY: Federal Highway Administration

MISSOURI HIGHWAY AND TRANSPORTATION COMMISSION:

By: [Signature] Date: 12-3-15
Title: Chief Engineer

Attest: [Signature] Approved as to form: [Signature]
Commission Secretary Commission Counsel
MEMORANDUM OF AGREEMENT
BETWEEN THE FEDERAL HIGHWAY ADMINISTRATION,
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UNDERTAKING: To construct a new bridge over the Mississippi River, MoDOT Job Number J3P2209 and Illinois Sequence Number 17263

STATE: Missouri and Illinois

AGENCY: Federal Highway Administration

ILLINOIS DEPARTMENT OF TRANSPORTATION:

By: [Signature] Date: 12-2-15

Title: [Title]

[Handwritten Signature]
INFORMATION TO ACCOMPANY

MEMORANDUM OF AGREEMENT
BETWEEN THE FEDERAL HIGHWAY ADMINISTRATION, 
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STATE: Missouri and Illinois

AGENCY: Federal Highway Administration

The Missouri Department of Transportation (MoDOT) in coordination with the Illinois Department of Transportation (IDOT) plans to replace the U. S. Highway 54 Bridge, commonly known as the Champ Clark Bridge or the Louisiana Bridge, over the Mississippi River (Project) connecting Pike County, Illinois and the City of Louisiana, Pike County, Missouri (MoDOT Job Number J3P2209 and ILDOT Sequence Number 17263) (see Figure 1 for project location).

The MoDOT and IDOT are working with the Federal Highway Administration (FHWA) to prepare an Environmental Assessment (EA) under the National Environmental Policy Act of 1969 for the Project.

As identified in the EA, the purpose of the project is to provide a reliable, safe and cost-efficient Highway 54 crossing over the Mississippi River between the City of Louisiana and Illinois. The needs identified for the project are to:

- reduce the on-going maintenance of the truss bridge, which results in periodic closures that inconvenience the traveling public,
- provide a bridge that meets standards for vertical clearance, lane width and shoulders,
- reduce impacts to Highway 54 in Illinois due to flooding, and
- improve the Highway 54/79 intersection in Louisiana.

Three reasonable alternates were retained for further study, in addition to the no build, through the Environmental Assessment study process. These three alternates include two upstream alternates and one downstream alternate. These alternates are shown on Figure 2.

The Adjacent Upstream (Red) alternate would construct a new two-lane bridge approximately 50 feet north of the existing bridge, with the highway 54 alignment crossing the existing alignment on the east side of the river to avoid impacts to the marina and river access on the Illinois side.
Figure 1. Location Map

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

Missouri & Illinois County Key

Champ Clark Bridge
(K0932)

Pike County
Route 54
MoDOT Job No. J3P2209
IDOT Sequence No. 17263
The **Adjacent Upstream with Improved Alignment (Yellow)** alternate would construct a new two-lane bridge generally north of the existing bridge and would flatten curves on the roadway in Illinois. The new bridge would begin about 70 feet north of the existing bridge on the west side of the river and cross existing Highway 54 alignment near the marina. This alignment would provide better sight distance on the Illinois side of the project.

The **Adjacent Downstream (Green)** alternate would construct a new two-lane bridge approximately 50 feet south of the existing bridge. It would require staged construction to maintain traffic in Louisiana.

The area of potential effects (APE) for the project was derived from the maximum footprints of the three reasonable alternatives. The APE was developed using the projected right of way limits for the bridge and intersection improvement alternates and including a buffer. A buffer of 250 feet was added to the limits of the bridge alternates and 150 feet was added to the intersection alternates. This APE allows for the consideration of direct and indirect effects on historic properties. Figure 2 shows the alternates and the APE for the Project.

**Efforts to Identify Historic Properties**

**Background Survey**

The *Missouri Historic Bridge Inventory* (Fraser 1996) identified the Champ Clark Bridge (K-932R) as eligible for listing on the National Register of Historic Places (NRHP) as an outstanding example of large scale highway truss construction.

An architectural survey of the City of Louisiana was conducted in 2004 (Snider 2004a). This survey included several buildings included in the architectural APE for the Project as shown in Table 1.

<table>
<thead>
<tr>
<th>Snider Survey Number</th>
<th>MoDOT AR/Parcel Number</th>
<th>Property Address</th>
<th>Snider Individual Evaluation</th>
<th>Snider District Evaluation</th>
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</thead>
<tbody>
<tr>
<td>37</td>
<td>25</td>
<td>620 N. 3rd St</td>
<td>Possibly eligible</td>
<td>Potential district</td>
</tr>
<tr>
<td>38</td>
<td>13</td>
<td>621 N. 3rd St</td>
<td>Not eligible</td>
<td>Not eligible</td>
</tr>
<tr>
<td>39</td>
<td>11</td>
<td>701 N. 3rd St</td>
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<td>Potential district</td>
</tr>
<tr>
<td>40</td>
<td>24</td>
<td>702 N. 3rd St</td>
<td>Not eligible</td>
<td>Potential district</td>
</tr>
<tr>
<td>41</td>
<td>10</td>
<td>703 N. 3rd St</td>
<td>Not eligible</td>
<td>Not eligible</td>
</tr>
<tr>
<td>175</td>
<td>37</td>
<td>125 Frankford Rd</td>
<td>Possibly eligible</td>
<td>Potential district</td>
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<tr>
<td>176</td>
<td>52</td>
<td>129 Frankford Rd</td>
<td>Eligible</td>
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<tr>
<td>312</td>
<td>38</td>
<td>402 Mansion</td>
<td>Possibly eligible</td>
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<tr>
<td>313</td>
<td>40</td>
<td>418 Mansion</td>
<td>Possibly eligible</td>
<td>Potential district</td>
</tr>
</tbody>
</table>
Following the 2004 architectural survey, a Multiple Property Documentation Form (MPDF) was prepared for the *Historic and Architectural Resources of Louisiana* (Snider 2005a). One historic district was listed within the APE, the North Third Street Historic District (Snider 2005b). The historic district is identified on Figure 2.

A search of the MoSHPO survey files for previous archaeological surveys or reported archaeological sites did not identify any previously reported sites.

**Architectural & Bridge Survey**

Architectural Historians from MoDOT conducted the architectural survey within the Missouri APE in August 2013. The survey identified 55 parcels with architectural resources, including thirty-two constructed prior to 1945. Of these resources, seven were recommended as individually eligible for listing in the NRHP, and one potentially eligible historic district was identified (Daniels 2014). Table 2 below identifies these resources.

<table>
<thead>
<tr>
<th>MoDOT AR Number</th>
<th>NRHP Criteria</th>
<th>Area(s) of Significance</th>
</tr>
</thead>
<tbody>
<tr>
<td>2 &amp; 4 River's Edge Motel</td>
<td>A &amp; C</td>
<td>Commerce, Architecture</td>
</tr>
<tr>
<td>11</td>
<td>C</td>
<td>Architecture</td>
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<tr>
<td>18</td>
<td>C</td>
<td>Architecture</td>
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<td>41</td>
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<td>43</td>
<td>C</td>
<td>Architecture</td>
</tr>
<tr>
<td>Champ Clark Bridge (K0932)</td>
<td>A &amp; C</td>
<td>Transportation, Commerce, Engineering</td>
</tr>
<tr>
<td>Wehrman/Frankford Historic District</td>
<td>C</td>
<td>Architecture</td>
</tr>
</tbody>
</table>

On September 25, 2014 the MoDOT sent these recommendations to the MoSHPO. The MoSHPO concurred with the recommendations regarding individual eligibility in a letter dated November 4, 2014, but indicated the Wehrman/Frankford Historic District would need additional
research before eligibility could be determined (copies of the correspondences are included in Appendix A).

The Illinois State Archaeological Survey (ISAS) surveyed architectural and bridge resources following IDOT guidelines. The ISAS identified six buildings and the Champ Clark Bridge in their survey. None of the buildings are recommended as eligible for listing in the NRHP. The ILSHPO concurred with that recommendation on July 7, 2015 (copies of the correspondence are in Appendix A).

**Archaeological Survey**

The IDOT and ISAS completed a preliminary field survey that identified six archaeological sites east of the Mississippi River in 2012. MoDOT historic preservation staff has been unable to conduct similar investigations on the west side of the river because the project encompasses a commercially and residentially developed area of the city of Louisiana. MoDOT has instead relied upon a combination of historical research and visual inspection to evaluate the potential for intact archaeological deposits in Missouri.

**Illinois Archaeological Survey Results**

The ISAS survey identified four previously unreported prehistoric era ancient Native American habitation sites and two historic sites. One historical site, a re-deposited floating platform or barge dating to the nineteenth century, is near the project corridor, but will not be directly impacted. In addition to the site-specific recommendations, geo-coring conducted within the project area indicates that the floodplain east of the levee is comprised of recent flood deposits. In situations such as this, buried archaeological deposits cannot be detected by surface survey alone; therefore, additional subsurface testing will be conducted for the preferred alternate prior to construction. Another Euro American site, the remnant of a habitation area, is not considered significant and warrants no further investigation. Because the latter site is not considered historically significant, impacts to that site are not used when evaluating the various alternatives. In addition to the site-specific recommendations, geo-coring conducted within the project area indicates that the floodplain east of the levee is comprised of recent flood deposits. In situations such as this, buried archaeological deposits cannot be detected by surface survey alone; therefore, additional subsurface testing would be conducted for the preferred alternate prior to construction. The IDOT submitted these findings to the ILSHPO on July 1, 2015. The ILSHPO concurred with the findings on July 7, 2015 (correspondence in Appendix A).

**Potential Archaeological Sites in Missouri**

A background check was conducted at the SHPO’s cultural resources library to determine the extent of previous cultural resources surveys in the general vicinity of the project area. A file search also was conducted at the SHPO to document locations of known sites. There are no previously reported archaeological sites in the vicinity of the proposed improvements. An examination of various historical sources—including The Bird’s Eye View of the City of Louisiana published in 1876, federal census records, and property deeds revealed twenty-three properties have been tentatively identified as falling within the study area and worthy of additional review. Each property has been evaluated and ranked according to estimated integrity,
or the potential for archaeological deposits to be present and undisturbed. Properties with “high” integrity would likely have greater significance and provide valuable information concerning the history of Louisiana, while properties with “low” integrity would have reduced significance and provide only limited opportunities for research (See Table 3 Potential Archaeological Sites in Louisiana, MO).

<table>
<thead>
<tr>
<th>Parcel</th>
<th>Integrity</th>
<th>Alternates</th>
</tr>
</thead>
<tbody>
<tr>
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</tr>
<tr>
<td>4</td>
<td>Mid</td>
<td>X</td>
</tr>
<tr>
<td>5</td>
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<td>X</td>
</tr>
<tr>
<td>21</td>
<td>Low</td>
<td></td>
</tr>
<tr>
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<td>Mid to High</td>
<td>X</td>
</tr>
<tr>
<td>19</td>
<td>Mid to High</td>
<td>X</td>
</tr>
<tr>
<td>35</td>
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<td>30/35</td>
<td>Mid to High</td>
<td>X</td>
</tr>
<tr>
<td>36</td>
<td>Mid to High</td>
<td>X</td>
</tr>
</tbody>
</table>

On July 29, 2013, MoDOT historic preservation staff conducted a visual inspection of the project area to evaluate the existing degree of disturbance or integrity along the proposed bridge alternatives and intersection options. Development of the area beginning in the 1850s and continuing to present day, has greatly modified the topography largely because of construction occurring along the side of a hill rather than on a naturally flat area. Based upon the field inspection, construction of Mansion Street (now Highway 54) and house lots on the north side of the road appears to have resulted in substantial grading and excavation. This excavation would have disturbed or removed any evidence of prehistoric occupation by Native American Indian tribes. However, archaeological deposits relating to homes built during the 1860s and 1870s (after the establishment of Mansion Street) might remain intact within the study area.

Additional archaeological investigations will be conducted when a final alignment is selected and right of access is received. Any additional archaeological sites that might be affected by the project will be addressed in accordance with the regulations (36 C.F.R. 800) implementing Section 106 of the National Historic Preservation Act (16 U.S.C. 470). Identified cultural resources will be evaluated according to the Department of the Interior's "Standards and Guidelines for Archaeology and Historic Preservation," in consultation with the Missouri and Illinois SHPO.
Description of Historic Properties

Below are descriptions of the seven architectural and bridge resources that have been determined eligible for the NRHP through consultation between the FHWA, MoSHPO and MoDOT, and the NRHP listed North Third Street Historic District. The property types mentioned in the eligibility discussion are those identified in the MPDF to standardize the evaluation of architectural resources in the City of Louisiana. The locations of these resources are shown on Figure 2.

**River’s Edge Motel (Architectural Resources 2 & 4)**

The River’s Edge Motel (Architectural Resources (AR) 2 and 4) contains two buildings. AR 4, the main building, which fronts on Highway 54, is a two-story, ca. 1955 hotel, with a concrete foundation, brick and stone siding, asphalt shingle gable roof and an irregular plan. The building has one-over-one and single light stationary glass windows, a single leaf entry door into each room, exterior corridor on the second story, an exterior stairway on the west end of the building. The balustrade on the stairs and along the second story walkway is iron with geometric triangle pattern. The office is in a projecting, one-story bay with a concrete foundation, stone walls, and an asphalt shingle pent roof. The office has large single-light stationary windows, and single-leaf glass doors. The office doors are accented by two beams, and iron posts with a square geometric pattern. Figures 3 and 4 below show the hotel as it appeared in 2013 and in the 1960s.

Figure 3: Architectural Resource 4, facing northwest
Architectural Resource 2 was constructed in 1962. The building has a concrete foundation, brick and stone veneer and vinyl sided walls, a standing seam metal pent-roof, and an irregular shape. The building is configured in two wings with a center junction. The western wing has four rooms in one story; the eastern wing has eight rooms on two floors. The south (main) façade of the wings has a brick veneer. The east and west end, and the center junction have stone walls. Each motel room is defined by a single-leaf door and a sliding glass window, the center junction has two single-leaf doors and paired sliding glass windows. The iron stair railings and the balustrade on the two story wing are identical to the railings on AR 4. The east façade has no openings. The west façade has sliding glass windows with a river view. The north façade has vinyl siding and sliding glass windows. Figure 5 shows the 1962 addition to the hotel.
The River’s Edge Motel is eligible for listing on the NRHP under criteria A and C for local significance in commerce and architecture. The motel building was the first motel constructed in Louisiana, and the success of the business is evident in the multiple early additions to the building, which culminated in the construction of the second building (AR 02) in 1962. The local newspaper followed the construction of the building and its additions, and ran a multi-page supplement for the open house for the building, something which was done for only a few buildings during a seven year period. The perceived economic importance of the building to the community of Louisiana is evident in the coverage that it was given and to the success of the business.

The building is significant as an excellent example of post-World War II roadside architecture. Dave Clark designed three motel buildings, all within a ten year period. This building is a locally significant example of the motel type.

**Architectural Resource 11**

Architectural Resource 11 is a one-story; ca. 1925 Bungalow with a rubble laid stone foundation, Masonite siding, asphalt shingle side-gable roof and a tee plan. The house has three-over-one and five-over-one wooden double-hung windows throughout, except for one opening on the south façade, which has a one-over-one replacement window. The main façade has two multi-light single-leaf doors under the porch. The porch is a side gable porch supported by wooden tapered posts, with a gable portico supported by rubble laid, tapered stone posts. The porch balustrade is rubble laid stone wall.

![Figure 6: Architectural Resource 11, facing east](image)

Architectural Resource 11 is eligible for listing on the NRHP under criterion C for local significance in architecture as an exceptionally detailed example of the Craftsman/Bungalow style.
FHWA
Pike County, Illinois & Pike County, Missouri
Champ Clark Bridge (K0932) Replacement
Information to Accompany the Memorandum of Agreement

Styles (property type H) which includes associated landscape elements of cobblestone retaining walls.

Although the original siding material has been replaced, the house has a high degree of integrity. The original doors and windows remain as do the porch posts and masonry associated with the house. There is a great degree of cobblestone work associated with the house including the cobblestone porch posts and closed balustrade, the stair surrounds from the house the sidewalk accented by posts, the retaining wall along the sidewalk, also accented by posts, the stair-step retaining wall around the basement garage entrance, retaining wall around back yard, and stair walls into the back yard.

The amount of stonework and the workmanship displayed is unusual for Louisiana. Because of this, the loss to the original siding material is easily overlooked.

The boundary is the current property line associated with the house, which is also the historic property of the house. The period of significance is ca. 1925, the estimated date of construction.

Architectural Resource 18

Architectural Resource 18 is a one-story, ca. 1870 gable front and wing form house with a stone foundation, brick siding, asphalt shingle cross-gable roof and an irregular plan. It has four-over-four wooden double-hung windows with stone lintels and brick segmental arch headers; windows are paired in each gable, with two windows in each long wall. The entry doors are multi-light and multi-panel wooden doors; there are transoms over the doors. There is a partial, pent-roof porch in the ell, with two turned posts and two turned engaged posts. The porch has turned verge boards, sawn brackets at the posts, and a balustrade of wooden posts forming a geometric patter; lattice covers the porch foundation. An entry to the cellar is found on the south façade. Figure 7 below shows AR 18.

Architectural Resource 18 is eligible for listing on the NRHP under criterion C for local significance in architecture as a good example of the vernacular Gabled Ell form (property type D) with excellent examples of Victorian detailing on the porch. The house appears on the 1876 Birdseye Map of Louisiana in the current configuration. The house exhibits a high degree of integrity of form, materials and design.

The boundary is the current property line, which is also the historic property associated with the house. The period of significance is ca. 1870, the estimated construction date of the house. The house and the hitching post adjacent to Third Street are both contributing elements.
Architectural Resource 40

Architectural Resource 40 is a two-story, ca. 1895, gable-front and wing form house with a concrete foundation, asbestos siding, asphalt-shingle flattened pyramid roof and an irregular plan, the house has a bowed front in the front gable. The house has one-over-one wooden double-hung sash windows, with colored multi-light-over-one windows in the bowed front. There is a one-story porch in the joined corner, with a turned post and attached posts and dentil molding and sawn brackets under the eaves. There are sawn brackets under the eaves of the bowed front gable. There is an interior brick chimney. On the east façade, there is a second story porch. Figure 8 shows AR 40.

Architectural Resource 40 is eligible for listing on the NRHP under criterion C for local significance in architecture as a good example of the vernacular Gabled Ell form (property type D) with examples of Victorian detailing on the porch and under the eaves. The house was constructed ca. 1895 and was the home of upper middle class professionals and business men, the size and detailing on the house reflects the status of the owners. The house has a high degree of integrity. The application of asbestos siding was done within the historical time frame, probably during the 1930s and does not alter the form of the house or obscure the detailing on it. The house is a good example of its type.

The boundary is the current property line, which is the property historically associated with the house. The period of significance is ca. 1895 the date of construction of the house.
Architectural Resource 41

Architectural Resource 41 is a two-story, ca. 1855, Italianate style, gable-front-and-wing form house with a stone foundation, brick siding, an asphalt-shingle cross-gable roof, and an irregular plan. The house has four-over-four, double-hung, wooden windows throughout, with carved wooden frames and functional wooden shutters on most windows. The main façade faces south onto Noyes Street. The forward facing gable front has two bays with windows and a two-story porch across the wing. There are two bays with multi-light doors and three-light transoms on each story of the porch and one bay with windows on the south façade of the wing on the porch, there is also a triple-hung, four-light window on the west facing wall of the gable that opens onto the porch, the window extends from the level of the door transoms to the porch floors. The porch has square, chamfered posts and a post balustrade on both stories. There is dentil molding at the roofline around the house.

Architectural Resource 41 is eligible for listing on the NRHP under criterion C for local significance in architecture as an excellent example of the Gabled Ell form (property type D) with Italianate detailing. The house, built ca. 1860, exhibits the detailing characteristic of the style including the low pitched roof, decorative brackets under the eaves and tall narrow windows with elaborate window surrounds. The house has a very high degree of integrity, including retaining the functional shutters, original doors and some triple hung windows onto the porch.

The boundary is the current property line, which is the property associated with the house since 1895. The period of significance is ca. 1860, the estimated construction date.
Architectural Resource 43

Architectural Resource 43 is a two-story, ca. 1900 Queen Anne style house with a stone foundation, weatherboard and fish-scale shingle siding, asphalt shingle hipped roof and a square plan. The entrance door is a nine-light single leaf door in a wooden surround, with a three-light transom above. The windows are one-over-one wooden double-hung sash windows with wooden surrounds. There is a front gable on the house with bays on the first and second stories. The siding on the gable and the bays is fish-scale shingles, the windows in the bays are three multi-light-over-one wooden double-hung sash windows. There is a partial one-story porch with square porch posts. There is side wall dormer with fish-scale shingle siding in the verge-board, and a vent in the attic level.
Architectural Resource 43 is eligible for listing on the NRHP under criterion C for local significance in architecture as an example of a Victorian House (property type B). The house has the mixture of siding materials characteristic of the style, in this case fish-scale shingles and bead board siding on the main façade bay projection and fish-scale shingles in the gable wall dormers and weatherboard siding on the body of the house. It has multi-light colored glass-over-one windows in the bay, and a front porch.

The boundary is the current property line which is the property historically associated with the house. The recommended period of significance is ca. 1900.

**Champ Clark Bridge (K0932)**

The Champ Clark Bridge (K0932) was constructed between 1926 and 1928 and consists of 5 main spans that are 14 panel rigid-connected Pennsylvania through trusses. These spans are 312’, 314’, 418’, 314’ and 318’ feet long, west to east. There are seven steel girder approach spans on the east end of the bridge. Most are between 95 and 98 feet long, one is 25 feet long. The overall bridge length is 2,286 feet. Figures 11, 12 and 13 provide an overview of the bridge.

![Figure 11: Champ Clark Bridge, facing northeast](image)
The Champ Clark Bridge, K0932, is eligible for listing on the NRHP under criterion C for local significance in engineering and under criterion A for local significance in transportation and commerce.
The Champ Clark Bridge was constructed between 1926 and 1928 by the Wisconsin Bridge and Iron Company from plans prepared by Harrington, Howard and Ash of Kansas City.

The bridge was a result of the efforts of the Missouri-Illinois Bridge Company, which included prominent residents of Louisiana, Missouri and Pittsfield, Illinois. The group promised to bring Illinois highways across the Mississippi River and on to the Pacific Ocean (Fraser 1996).

The Louisiana Chamber of Commerce promoted the bridge as the “Gateway to the West”. They said the new bridge would save drivers many miles and traffic congestion because they wouldn’t have to divert south to the St. Louis area (Chamber nd). Promoting the use of the bridge would increase revenue for the bridge, which was a toll bridge, and to area businesses. The Louisiana Chamber of Commerce contracted with Rand, McNally to produce a map showing transcontinental highways that could easily route across the Champ Clark Bridge (Figure 14).

![Figure 14: Cover of Rand McNally Map for Champ Clark Bridge](image)
North Third Street Historic District

The North Third Street Historic District is listed on the NRHP under criteria A and C for local significance in the areas of community planning and development and architecture. It is one of the earliest residential neighborhoods in the community, was home to many prominent citizens, and has many intact examples of a variety of architectural styles. It has a period of significance of 1843 to 1935, the dates of the earliest and latest constructed building in the district. The district extends north into the APE and includes AR 24 and AR 25 as contributing resources. Figures 15 and 16 show these resources.
Description of the Project Effects on the Historic Properties

The three alternates being studied have similar effects on some historic properties, and different effects on other historic properties. Those properties where all the alternates have similar effects will be addressed first.

None of the alternates being studied will affect North Third Street Historic District, AR 40, AR 41 or AR 43 either directly or indirectly. In all cases there will be no right of way takings from the property, the roads will have returned to existing alignment in the vicinity of these properties, or the intervening properties between the historic property and the highway will not be removed, causing no changes in the viewshed.

Architectural Resource 4, the River’s Edge Motel, would be adversely affected by both the Red and Yellow Alternates, because both would require the removal of the motel building. The Green alternate to the south of the bridge would have an indirect, but not adverse, effect on the Motel because it would change the viewshed from the Motel. The view of the bridge is not a character defining feature of the historic property—advertising promoted scenic views of the river, not of the bridge.

Architectural Resource 11 would not be affected by either the Red or Yellow Alternates because the improvements would be occurring on the far side of Highway 54 away from the historic property, and all intersection improvements would be tied into the existing Third Street far from the property. The Green Alternate would have an indirect, but not adverse, effect on the historic property because it would remove one of the buildings between the historic property and the highway and the intersection traffic would be moving differently near the property; however, the improvements would be tied into existing Third Street before they reached the property lines. Traffic would be moving more smoothly through the intersection, which would decrease noise at the intersection.

Architectural Resource 18 would be indirectly, but not adversely, affected by both the Red and Yellow alternates, because they would require the removal of the building between the historic property and the highway, and the highway would move closer to the historic property. This would not be an adverse effect on the property because it is significant for its architectural features and not for the views to or from it. The Green Alternate would have no effect on this resource because the intervening building would be left in place and the intersection improvements would not affect how traffic is directed north of Highway 54.

All three alternates would have an adverse effect on the Champ Clark Bridge (K0932) because all three assume that the bridge be removed.

In summary, the Red and Yellow alternates would have an adverse effect on two historic properties, the River’s Edge Motel (AR 4) and the Champ Clark Bridge (K0932). The Green
alternate would have an adverse effect on the Champ Clark Bridge (K0932). Table 4 below summarizes the alternates and their effects on historic properties.

<table>
<thead>
<tr>
<th>Historic Property</th>
<th>Alternate</th>
<th>Comments</th>
</tr>
</thead>
<tbody>
<tr>
<td></td>
<td>Red</td>
<td>Yellow</td>
</tr>
<tr>
<td>AR 4</td>
<td>Adverse</td>
<td>Adverse</td>
</tr>
<tr>
<td>AR 11</td>
<td>No Effect</td>
<td>No Effect</td>
</tr>
<tr>
<td>AR 18</td>
<td>No Adverse</td>
<td>No Adverse</td>
</tr>
<tr>
<td>AR 40</td>
<td>No Effect</td>
<td>No Effect</td>
</tr>
<tr>
<td>AR 41</td>
<td>No Effect</td>
<td>No Effect</td>
</tr>
<tr>
<td>AR 43</td>
<td>No Effect</td>
<td>No Effect</td>
</tr>
<tr>
<td>Champ Clark Bridge (K0932)</td>
<td>Adverse</td>
<td>Adverse</td>
</tr>
<tr>
<td>North Third Street Historic District</td>
<td>No Effect</td>
<td>No Effect</td>
</tr>
</tbody>
</table>

The Green Alternate will be identified as the preferred alternate in the EA. The Green Alternate will have an adverse effect on the Champ Clark Bridge (K0932). It will not have an adverse effect on any of the remaining resources listed on, or recommended as eligible for listing on, the NRHP.

Consultation and Public Involvement

Consultation

The FHWA invited the MoDOT and IDOT to participate as consulting parties as potential recipients of federal funding. The MoSHPO and ILSHPO have also participated in consultation regarding the Project. (Copies of all correspondence are included in Appendix A).

The FHWA invited a number of Tribes were invited to participate in the Agency Scoping Meeting on August 29, 2012 at the beginning of the NEPA process (see Table 5), and notified these tribes of the project. None of the tribes chose to participate in the Agency Scoping meeting, and to date. These tribes had previously expressed interest in the project area. The tribes were notified by the Illinois Project Notification System when the archaeological report for the Illinois...
side of the project was complete and available for review and when the ILSHPO concurrence with the report recommendations was posted. The Osage Nation responded following the posting of the ILSHPO letter indicating that they believe the project will have an adverse effect to deeply buried site and that due diligence had not been exercised because survey work had not yet been conducted (copy of correspondence in Appendix A). The Osage Nation will be consulted as work on the project continues. The remaining tribes will also be involved in consultation as the archaeological survey continues.

### Table 5: Tribes Invited to Participate in the NEPA and Section 106 Process

<table>
<thead>
<tr>
<th>Tribe</th>
</tr>
</thead>
<tbody>
<tr>
<td>Iowa Tribe of Kansas and Nebraska</td>
</tr>
<tr>
<td>Iowa Tribe of Oklahoma</td>
</tr>
<tr>
<td>Miami Tribe of Oklahoma</td>
</tr>
<tr>
<td>Osage Nation</td>
</tr>
<tr>
<td>Ponca Tribe of Nebraska</td>
</tr>
<tr>
<td>Sac and Fox Nation of Oklahoma</td>
</tr>
<tr>
<td>Sac and Fox Tribe of the Mississippi in Iowa</td>
</tr>
<tr>
<td>Kaw Nation</td>
</tr>
<tr>
<td>Muscogee (Creek) Nation of Oklahoma</td>
</tr>
<tr>
<td>Peoria Tribe of Oklahoma</td>
</tr>
<tr>
<td>Sac and Fox Nation of the Missouri in Kansas and Nebraska</td>
</tr>
</tbody>
</table>

In addition there are a number of groups with an interest in the project area or historical resources that were invited to participate in consultation (see Table 6).

### Table 6: Parties Invited to Participate in Consultation

<table>
<thead>
<tr>
<th>Organization</th>
<th>Interest</th>
<th>Chose to Participate</th>
</tr>
</thead>
<tbody>
<tr>
<td>City of Louisiana</td>
<td>local government</td>
<td>No</td>
</tr>
<tr>
<td>Louisiana Historic Preservation Commission</td>
<td>local government</td>
<td>No</td>
</tr>
<tr>
<td>Pike County, Illinois</td>
<td>local government</td>
<td>Yes</td>
</tr>
<tr>
<td>Nathan Holth/Historicbridges.org</td>
<td>bridge interest</td>
<td>Yes</td>
</tr>
<tr>
<td>Historic Bridge Foundation</td>
<td>bridge interest</td>
<td>Yes</td>
</tr>
<tr>
<td>Louisiana Historic Preservation Association</td>
<td>local</td>
<td>Yes</td>
</tr>
<tr>
<td>Louisiana Area Historical Museum</td>
<td>local history</td>
<td>No</td>
</tr>
<tr>
<td>Pike County, MO Historical Society</td>
<td>local history</td>
<td>No</td>
</tr>
<tr>
<td>Pike County, IL Historical Society</td>
<td>local history</td>
<td>No</td>
</tr>
</tbody>
</table>
In November 2014 the consulting parties were sent copies of the Missouri Architectural & Bridge Survey, as well as drafts of the Purpose and Need and Alternatives chapters from the Environmental Assessment for review and comment. The information included that the alternative that would be identified as the preferred would have an adverse effect on the historic bridge and that the no build and rehabilitation alternates were not considered feasible. No comments were received from the consulting parties on the eligibility of the resources or on the alternatives under consideration.

On January 9, 2015 the Advisory Council on Historic Preservation (Council) was notified of the Adverse Effect the project would have on the Champ Clark Bridge and invited to participate in consultation to minimize and mitigate the adverse effect. On January 28, 2015 the Council declined to participate in consultation.

In February 2015 the consulting parties were informed that the Council had chosen not to participate in the consultation process and that the MoSHPO had concurred with MoDOT’s recommendations regarding the eligibility of buildings and the bridge. The letter further asked for ideas for appropriate mitigation for the Champ Clark Bridge.

In April 2015 MoDOT received two letters from Nathan Holth, one of the consulting parties with ideas for the mitigation. Mr. Holth suggested the development of a Historic Bridge Management Plan with a commitment to preserve at least one large-scale historic metal truss bridge or that MoDOT remove and preserve one of the smaller spans of the bridge not just offer it to a third party. Mr. Holth made additional comments about the range of alternates being considered. MoDOT responded to Mr. Holth’s comments on May 6, 2015 on alternates, reiterating the alternates that had been considered during the EA and relocation of one of the trusses from the bridge. MoDOT indicated that pursuing a preventative maintenance plan for the Liberty Bridge could be pursued during consultation for a planned (but unscheduled) programmatic agreement for through truss bridges. Mr. Holth responded on June 12, 2015 expressing dissatisfaction with MoDOT.

On May 27, 2015 MoDOT circulated a draft MOA with basic mitigation measure stipulations for comment. It was requested that suggested revisions and comments be returned to MoDOT by July 1. Following the circulation of that MOA MoDOT began efforts to schedule a teleconference to discuss appropriate mitigation.

On August 11, 2015 the first consultation meeting was conducted by teleconference (the minutes are included in Appendix B). The meeting focused primarily on developing appropriate mitigation measures for the bridge. As a result of the meeting the following mitigation ideas were developed for consideration:

- Bridge maintenance/preservation plan for major river bridges
- Educational materials—exact nature undefined, but some way of getting the information from the historical documentation to the public
- Interpretive plaque/panel with information on the bridge
MoDOT and IDOT staff participating in the consultation meeting needed to consult internally with their Bridge Divisions about major river bridges that would be good candidates for preservation. The MoDOT identified seven bridges on the Mississippi and Missouri Rivers that were constructed prior to 1970, including the Champ Clark Bridge (see Table 7). This list was sent to the MoDOT Bridge Division to see if any would meet the qualifications for the bridge preventative maintenance program.

Only the Liberty Bridge in Jackson County and the Martin Luther King, Junior Bridge in St. Louis City were identified as having much service life remaining in them. The Bridge Division indicated that with a continued investment, these two bridges could last another 20 to 25 years; however, they were past the tipping point for preservation due to advanced section loss and pack rust in built up members. Given this situation, doing a preservation plan for the bridges is not reasonable.

MoDOT had previously consulted with the City of Louisiana about preparing an interpretive panel on the history and significance of the Champ Clark Bridge and installing it for the City.
The City enthusiastically supports the idea, and would like the panel installed at the Riverview Park, which overlooks the bridge location.

MoDOT was also willing to commit to preparing a video about the bridge. During the previous winter two bridges had included video as part of their mitigation package, and Historic Preservation staff had asked the Video Production Unit to put together a draft video for the Champ Clark Bridge from video taken for a training project so the consulting parties could see what could be done.

MoDOT is willing to prepare a brochure on the bridges spanning the Mississippi River between Missouri and Illinois similar to the “Spanning Oregon’s Coast” brochure produced by the Oregon Department of Transportation. This brochure can include more than truss bridges and can include information on the bridges that have been removed as well as the replacement bridges. A brochure could be produced inexpensively and could be distributed through Visitor’s Centers along the Mississippi River run by the Department of Tourism or associated with the Great River Road. The brochure could be linked to a web-site that contains additional information about the bridges.

MoDOT owns the web domain www.champclarkbridge.com, which is currently being used for public involvement for the EA process. Since the community favors keeping the Champ Clark name for the new bridge, the MoDOT Northeast District is proposing to keep the web domain as a web-site for the bridge, which will include information on the new and historic bridge.

MoDOT will pursue the feasibility to prepare 3D (LIDAR) imaging of the bridge. If feasible the bridge will be scanned prior to demolition (if the bridge is removed) and the images will be referenced to photographs. MoDOT will consult with the Missouri SHPO, IDOT and the Illinois SHPO to determine appropriate ways to make the information accessible to the public. If the FHWA Divisions from Missouri and Illinois wish to participate in the discussions, they will be invited to.

On September 28, 2015 a second consultation meeting was held at which the results of the internal MoDOT consultation were discussed, and the final mitigation measures for the Champ Clark Bridge were agreed to. The MOA was drafted including these mitigation measures and sent to the consulting parties to provide them with the opportunity to review and comment on the document prior to execution. No comments were received on the document.

**Public Involvement**

The public involvement process for the EA has been used for the public involvement for Section 106. A Community Advisory Group (CAG) has been formed for the project. The CAG has met regularly and discusses issues relating to the project. Any questions the CAG has are addressed by appropriate MoDOT or IDOT staff.
To date, three public meetings have been held, on November 8, 2012, March 21, 2012, and October 2, 2012. MoDOT Historic Preservation Staff have participated in two of these meetings, with information available about the Section 106 process, and the status of the process at each meeting. Copies of the public meeting summaries and the cultural resources displays from the meetings are located in Appendix C.

A web-site was created for the project, which allows the public to share their views on issues (http://www.champclarkbridge.com/). Among the questions posed was asking to be informed of any Cultural Resources concerns the public had. The only response was an idea to name the new bridge after Zebulon Pike.

There has been extensive coverage of the EA process from local newspapers in Louisiana and Hannibal, Missouri and Quincy, Illinois, which has helped keep people informed about the progress. Most newspaper coverage includes information on how to contact the study team with questions or how to share information.
References

Louisiana Chamber of Commerce (Chamber)

Daniels, Karen L.

Fraser, Clayton
1996 Missouri Historic Bridge Inventory (Draft). Loveland, CO: Fraserdesign.

Snider, Becky L.


Appendices

Appendix A: Correspondence
Appendix B: Consultation Meetings
Appendix C: Public Meeting Summaries and Cultural Displays
Appendix A: Correspondence
This letter was sent to all the tribes.

**Missouri Division**

6031 W. Edgewood, Suite H
Jefferson City, Missouri 65109
(573) 636-7104
Fax (573) 636-9283
Missouri.FHWA@fhwa.dot.gov

July 31, 2012

Mr. Tim Rhodd, Chairman
Iowa Tribe of Kansas and Nebraska
3345 Thrasher Rd
White Cloud, KS 66094

Subject: U.S. Route 54, Pike County, MO and Pike County IL
MoDOT Job No. J3P2209, Mississippi River Bridge
Invitation to Agency Scoping Meeting

Dear Chairman Tim Rhodd:

The Federal Highway Administration (FHWA), in cooperation with the Missouri Department of Transportation (MoDOT) and Illinois Department of Transportation (IDOT), is initiating an Environmental Assessment (EA) on a proposal to replace the structurally deficient and functionally obsolete U.S. Route 54 Champ Clark Bridge over the Mississippi River with a new bridge and appurtenant roadways/structures. The proposed project extends from the city of Louisiana in Pike County, Missouri to Pike County, Illinois. The alternatives considered may include a build alternative on existing alignment and build alternatives north or south of the existing bridge as well as no-build/rehabilitation.

You have previously expressed an interest to consult about MoDOT projects in this area. Because of your interest, we invite your representatives to attend the U.S. Route 54 Mississippi River Bridge Scoping meeting in Louisiana, Missouri at 1:30 p.m. on Wednesday, August 29, 2012. The meeting will be held at the Twin Pike Family YMCA (http://www.ymca.net/y-profile/?assn=3355), 614 Kelly Lane, Louisiana, MO 63353, phone: (573) 754-4497. The lead agencies highly recommend that attendees allow time to visit the project area on the way to the meeting. MoDOT staff will give a presentation about the project, after which agency and tribal representatives are invited to ask questions, offer comments and information, and discuss any specific concerns about the project. The enclosed materials provide more information. Comments and suggestions are invited from all interested parties to ensure that all pertinent concerns are identified and the full range of issues related to this proposed action are addressed.

MoDOT will hold a 1:00 p.m. press conference before the meeting to begin educating the public about the EA process and the resources in the study area and we encourage you to attend and help answer questions from the media. While MoDOT will take the lead at the press conference, your representative’s participation will aid public knowledge about the project and signal that all
agencies and tribal governments are aware of the importance of the U.S. Route 54 Mississippi River Bridge to the area.

Please notify Keith Killen, MoDOT Northeast District Project Manager, by August 15, 2012, regarding your representation at the Agency Scoping Meeting and attendance at the preceding press conference. An accurate count will help us plan appropriately for scoping materials and allow us to notify attendees of any last-minute schedule changes. Keith can be reached by telephone at (660) 385-8638 or email, Keith.Killen@modot.mo.gov, should you have any questions.

Thank you for your cooperation and interest in this project.

Sincerely yours,

Peggy J. Casey, P.E.
Environmental Program Manager

Enclosure

CC: Norm Stoner - FHWA Illinois
    Denny O'Connell - IDOT
    Keith Killen - MoDOT NE
    Carole Hopkins - MoDOT DE

PJC
September 15, 2014

City of Louisiana
Bart Niedner, Mayor
202 South 3rd Street
Louisiana MO 63353

Honorable Mayor Bart Niedner:

Subject: Design
Pike County Missouri & Illinois, Route 54
Job No. J3P2209
Route 54 between Louisiana and Illinois
Section 106 Compliance Memorandum

The Missouri Department of Transportation (MoDOT) is preparing documentation to comply with Section 106 of the National Historic Preservation Act, which requires federal agencies, or the recipients of federal funds, to consider the effects of their projects on properties that are listed on or eligible for listing on the National Register of Historic Places. As part of the Section 106 process, MoDOT would like to know if your agency would like to participate in consultation about the eligibility of resources for listing on the National Register, the effect of the proposed project on these resources and appropriate mitigation for resources that cannot be avoided. Information on the Section 106 process can be found in The Citizen's Guide to Section 106 on the Advisory Council for Historic Preservation’s website (http://www.achp.gov/docs/CitizenGuide.pdf) and on our website (http://www.modot.mo.gov/ehp/HistoricPreservation.htm).

If you would like to participate in consultation or if you or any of your staff have any questions, please contact Karen Daniels, MoDOT Senior Historic Preservation Specialist, at (573) 526-7346 or by e-mail at Karen.Daniels@modot.mo.gov.

Sincerely,

Michael C. Meinkoth
Historic Preservation Manager

Attachments

Copies: Ms. Sara Parker Pauley – MDNR
Ms. Paula Gough – NE-aq
Mr. Jim Smith – CO-de
Ms. Raegan Ball – FHWA
Ms. Daniels,

I am the vice chairman of the Pike County (IL) Board and also the vice president of the Pike County (IL) Historical Society. Andy Borrowman, the chairman of the County board gave me Mr. Meinkoth’s letter about section106 Compliance. I would be interested in being the contact person for consultation about National Register eligibility, etc.

Thank you.

Michael Boren
241 S. Illinois St.
Pittsfield, IL 62363

217-285-4975
Karen Daniels

From: Nathan Holth <nathan@historicbridges.org>
Sent: Thursday, October 09, 2014 11:11 AM
To: Karen Daniels
Subject: RE: MO-IL, Route 54, Champ Clark Bridge, MoDOT Job No J3P2209

Karen,

Not sure why that never got updated, but the address should be:

Nathan Holth
12534 Houghton Drive
Dewitt, MI, 48820

In either case, I definitely would like to participate as a consulting party. Also, have you sent and got a positive response from the Historic Bridge Foundation? I would like them involved with this as well if possible.

Thanks,
-Nathan

========================================
Nathan Holth
Author/ Photographer/Webmaster
-----HistoricBridges.org-----
"Promoting the Preservation Of Our Transportation Heritage"
Mailing Address:
12534 Houghton Drive
Dewitt, MI, 48820
---------------------------------------------------
269-290-2593
nathan@historicbridges.org
www.historicbridges.org
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From: Karen Daniels [mailto:Karen.Daniels@modot.mo.gov]
Sent: Thursday, October 09, 2014 9:45 AM
To: Nathan Holth - HistoricBridges.org (nathan@historicbridges.org)
Subject: MO-IL, Route 54, Champ Clark Bridge, MoDOT Job No J3P2209

Nathan,

We tried to send you a letter, to invite you to participate in Section 106 consultation about the project to replace the Champ Clark Bridge over the Mississippi River on Highway 54 between Missouri and Illinois. The letter came back as undeliverable. I used the last address I had on file for you. Attached is a pdf file of the letter.
Please let me know if you would like to participate.

Thank you,

Karen

Karen L. Daniels
Senior Historic Preservation Specialist
Design/Historic Preservation
Missouri Department of Transportation
601 W. Main St., P. O. Box 270
Jefferson City, MO 65102
Karen.Daniels@modot.mo.gov
573.526.7346
September 25, 2014

Mr. Mark Miles, Director SHPO
MDNR/DSP
P. O. Box 176
Jefferson City, MO 65102

Dear Mr. Miles:

Subject: Design
Pike County, Route 54
Job No. 33P2209
Champ Clark Bridge Replacement
Section 106 Compliance Memorandum

Please find attached a Section 106 Survey Memo (one paper copy and one .PDF file) detailing the results of a cultural resources investigations conducted for the above referenced project. The Champ Clark Bridge (K0932), Architectural Resources (AR) 11, 18, 40, 41, 43 and the River’s Edge Motel (AR 02 & 04) are recommended as individually eligible for listing on the National Register of Historic Places. In addition AR 46, 50, 51 and 52 are recommended as eligible as the Frankford/Wehrman Historic District.

It is the Missouri Department of Transportation’s (MoDOT) opinion that the preferred alternate for the project, the Green Alternate, will have an adverse effect on the Champ Clark Bridge (K0932), and no adverse effect on Architectural Resources 11, 18, 40, 41, 43, the River’s Edge Motel or the Frankford/Wehrman Historic District. A Memorandum of Agreement (MOA) will need to be developed in consultation with the Federal Highway Administration, the Missouri State Historic Preservation Office (SHPO), the Illinois SHPO and the consulting parties. The MoDOT request the concurrence of the SHPO with these findings.

Should you or any of your staff have any questions, please contact Karen Daniels, MoDOT Senior Historic Preservation Specialist, at Karen.Daniels@modot.mo.gov or (573) 526-7346.

Sincerely,

Michael C. Meinkoth
Historic Preservation Manager

Attachments

Copies: Ms. Sara Parker Pauley – MDNR
Ms. Paula Gough – NE-ao
Mr. Jim Smith – CO-de
Ms. Raegan Ball – FHWA
November 4, 2014

Michael Meinkoth
Historic Preservation Manager
Missouri Department of Transportation
P.O. Box 270
Jefferson City, Missouri 65102

Re: Route 54, Champ Clark Bridge K0932, Job No. J3P2209 (FHWA) Pike County, Missouri

Dear Mr. Meinkoth:

Thank you for submitting information on the above referenced project for our review pursuant to Section 106 of the National Historic Preservation Act (P.O. 89-665, as amended and the Advisory Council on Historic Preservation’s regulation 36 CFR Part 800, which require identification and evaluation of cultural resources.

We have reviewed the information provided concerning the above referenced project. We concur with your determination that the Champ Clark Bridge K0932, Louisiana, Pike County, is eligible for inclusion in the National Register of Historic Places. We also concur with your determination that the proposed demolition will have an adverse effect on the historic fabric of Bridge K0932. We also concur that the Rivers Edge Motel (AR 2 & 4) is eligible, and, in the event that the Red or Yellow Alternative is selected, there will be an adverse effect on this property as well.

A Memorandum of Agreement (MOA) that outlines the steps needed to mitigate the adverse effect for this project will need to be drafted. Final stipulations in the MOA should be determined in consultation with the Federal Highway Administration, the Missouri Department of Transportation, our office, the Advisory Council, if participating, and any other interested parties.

The U.S. Department of Transportation should forward the necessary adequate documentation as described to the Executive Director, Advisory Council on Historic Preservation, The Old Post Office Building, 1100 Pennsylvania Avenue NW, #809, Washington, DC 20004. Pending receipt of the Council's decision on whether it will participate in consultation, no action shall be taken which would foreclose Council consideration of alternatives to avoid or satisfactorily mitigate any adverse effect on the property in question.

We also concur that Architectural Resources 11, 18, 40, 41, 43 may be eligible. The proposed Wehrman/Frankford Historic District (AR 46, 50, 51 and 52) would require additional documentation to address the concerns about integrity before we could comment on eligibility.

If you have any questions, please write Judith Deel at State Historic Preservation Office, P.O. Box 176, Jefferson City, Missouri 65102 or call 573/751-7862; or Amanda Burke at 573/ for questions on architecture.
Please be sure to include the SHPO Log Number (026-PI-12) on all future correspondence or inquiries relating to this project.

Sincerely,

STATE HISTORIC PRESERVATION OFFICE

Mark A. Miles
Director and Deputy State Historic Preservation Officer

MAM:d

c Raegan Ball, FHWA

Celebrating 40 years of taking care of Missouri's natural resources. To learn more about the Missouri Department of Natural Resources visit dnr.mo.gov.
Advisory Council on Historic Preservation  
Attention: Chris Wilson, Interim FHWA Liaison  
401 F Street NW, Suite 308  
Washington, DC 20001-2637

RE: Notification regarding an adverse effect determination for Bridge K0932 (Champ Clark Bridge) on Route 54, Pike County, Missouri and Pike County, Illinois

Dear Mr. Wilson:

Per 36 CFR 800.6, the Federal Highway Administration (FHWA) is notifying your office of an adverse effect determination for Bridge K0932, the Champ Clark Bridge carrying Highway 54 over the Mississippi River between Pike County, Missouri and Pike County, Illinois.

Since the bridge is eligible for inclusion on the National Register of Historic Places, FHWA is requesting to know whether the Advisory Council would like to participate as a consulting party in the development of a Memorandum of Agreement for the resolution of adverse effects for the project. Documentation is enclosed to aid in your review of the project and evaluating your response.

If you have any questions, or would like additional information, please contact me at 573-638-2620 or by e-mail at: raegan.ball@dot.gov.

Sincerely,

Raegan Ball  
Program Development Team Leader

Enclosures

cc: Judith Deel, MoSHPO  
Rachel Leibowitz, ILSHPO  
Mike Meinkoth, MoDOT  
Jan Piland, FHWA Illinois Division
January 28, 2015

Ms. Raegan Ball
Program Development Team Leader
Federal Highway Administration
Missouri Division
3220 W. Edgewood, Suite H
Jefferson City, MO 65109

Ref: Proposed Replacement of Champ Clark Bridge (K0932) on Route 54 over the Mississippi River
Pike County, Missouri and Pike County, Illinois

Dear Ms. Ball:

The Advisory Council on Historic Preservation (ACHP) has received your notification and supporting documentation regarding the adverse effects of the referenced undertaking on a property or properties listed or eligible for listing in the National Register of Historic Places. Based upon the information provided, we have concluded that Appendix A, Criteria for Council Involvement in Reviewing Individual Section 106 Cases, of our regulations, “Protection of Historic Properties” (36 CFR Part 800), does not apply to this undertaking. Accordingly, we do not believe that our participation in the consultation to resolve adverse effects is needed. However, if we receive a request for participation from the State Historic Preservation Officer (SHPO), Tribal Historic Preservation Officer (THPO), affected Indian tribe, a consulting party, or other party, we may reconsider this decision. Additionally, should circumstances change, and it is determined that our participation is needed to conclude the consultation process, please notify us.

Pursuant to 36 CFR §800.6(b)(1)(iv), you will need to file the final Memorandum of Agreement (MOA), developed in consultation with the Missouri and Illinois State Historic Preservation Office’s (SHPO’s), and any other consulting parties, and related documentation with the ACHP at the conclusion of the consultation process. The filing of the MOA, and supporting documentation with the ACHP is required in order to complete the requirements of Section 106 of the National Historic Preservation Act.

Thank you for providing us with the notification of adverse effect. If you have any questions or require further assistance, please contact Mr. Chris Wilson at 202-517-0229 or via e-mail at cwilson@achp.gov.

Sincerely,

LaShavio Johnson
Historic Preservation Technician
Office of Federal Agency Programs
February 18, 2015

Pike County, Illinois
Andy Borrowman, Chair
100 E. Washington St.
Pittsfield, IL 62363

Subject: Design
Pike County (Missouri & Illinois), Route 54
Job No. J3P2209 (Mo. SHPO Log No. 026-PI-12)
Champ Clark Bridge Replacement
Section 106 Consultation

We wanted to bring you up to date with where we are in our consultation process. The Missouri State Historic Preservation Office (SHPO) has concurred with MoDOT’s recommendation that the Champ Clark Bridge (K0932) is eligible for listing on the National Register of Historic Places for significance in transportation, commerce and engineering. The SHPO concurred that all three alternates being considered would have an adverse effect on the Champ Clark Bridge.

The SHPO also concurred with MoDOT’s recommendations regarding the eligibility of individually eligible buildings, and that the preferred alternate would not adversely affect these buildings.

The Federal Highway Administration (FHWA) has informed the Advisory Council on Historic Preservation (Council) of the adverse effect and asked if they would like to participate in consultation. They have declined to participate in consultation.

At this time, we need to move forward with efforts to resolve adverse effects.

The previous mailing to you included the draft purpose and need and the alternatives chapters from the Environmental Assessment being prepared. From those you can see that the alternatives to bridge replacement considered included doing nothing and rehabilitation of the bridge. These alternatives were not considered reasonable and prudent because they do not address the purpose and need of the project.

Because replacing the bridge is considered the only reasonable and prudent alternative, we need to look at ways to mitigate, or compensate, for the removal of the historic resource. Traditionally MoDOT has prepared archival photographs and historical documentation. These can be prepared to Historic American Engineering Record Standards (for example, the Paseo Bridge in Jackson County, see at: http://www.loc.gov/pictures/collection/hh/item/mo1931/).
or to “state level” which takes photographs to the standards of the National Register (for example, the Daniel Boone Bridge in St. Louis and St. Charles Counties, see at: http://library.modot.mo.gov/RTD/reports/historicbridges/Daniel_Boone_Bridge_J1000_Report.pdf). Copies of documentation are provided to the SHPO (in this case it would be provided to both Missouri and Illinois) and to repositories in the local community, usually historical societies or public libraries.

MoDOT will be required to make the bridge available to local governments and other interested parties who might be interested in relocating it or preserving it in place. This will be done through a combination of our Free Bridges web-site (http://www.modot.org/freebridges/), press releases and direct mail. Since the replacement project is currently unfunded, there is ample time for a local group to organize and fundraise to save all or part of the bridge.

We would like to hear from you about the resolution of adverse effects. What could we do to recognize the history of the bridge in a way that would be beneficial to the community? We will take the ideas we receive and develop a Memorandum of Agreement that will cover mitigation of the bridge and the archaeological surveys that will need to be conducted once right-of-way limits are known.

We would like to hear any ideas you may have for the resolution of adverse effects and for mitigation measures. Please send them by e-mail to Karen Daniels, Senior Historic Preservation Specialist at Karen.Daniels@modot.mo.gov or call her at 573.526.7346, or mail them to the address above. We need comment returned to us no later than April 1, 2015.

Sincerely,

Michael C. Meinkoth
Historic Preservation Manager

Attachments

Copies: Ms. Sara Parker Pauley – MDNR
        Ms. Paula Gough – NE-ao
        Mr. Jim Smith – CO-de
        Ms. Raegan Ball – FHWA
Pike, Pike County, IL  
Louisiana, Pike County, MO  
Champ Clark Bridge Replacement  
FAP 321, US 54  
IDOT Sequence #17263  
ISAS Log #12110  
Federal - Section 106 Project

July 1, 2015

CONDITINAL NO ADVERSE EFFECT

Dr. Rachel Leibowitz
Deputy State Historic Preservation Officer
1 Old State Capitol
Illinois Historic Preservation Agency
Springfield, Illinois 62701

Dear Dr. Leibowitz:

Enclosed are copies the Illinois Department of Transportation (IDOT) Environmental Survey Request form, photographic documentation, and the Phase I Survey Report completed by Illinois State Archaeological Survey (ISAS) personnel concerning historical and archaeological resources potentially impacted by the above referenced project.

In Illinois, the survey of the 260-acre project area resulted in the identification of six archaeological sites (11PK1910-1915), and no architectural resources eligible for National Register consideration were identified by IDOT's cultural resources staff. The Champ Clark Bridge, which spans the Mississippi River and is controlled by the Missouri Department of Transportation (MoDOT), has been determined eligible for National Register and will likely be impacted by the proposed project.

Three alternative alignments have been considered by MoDOT and IDOT, and all three avoid potential impacts to the known archaeological sites in Illinois (see attached maps). However, geo-coring work undertaken by ISAS has identified the potential for buried archaeological sites. Moreover, impacts to potential archaeological resources within the community of Pike have not been assessed. Therefore, when the final alignment in Illinois has been selected and access to impacted parcels has been secured, IDOT will ensure that investigations are undertaken to identify and evaluate archaeological resources. This commitment will be included in the Memorandum of Agreement (MOA) currently being developed in coordination with MoDOT.
In coordination with the Federal Highway Administration (FHWA), IDOT requests the concurrence of the State Historic Preservation Officer in our determination that no historic properties in Illinois subject to protection under Section 106 of the National Historic Preservation Act of 1966 will be adversely affected by the proposed project provided that further archaeological studies are completed in coordination with your office and in accordance with the project MOA.

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

Sincerely,

Brad H. Koldehoff, RPA
Cultural Resources Unit
Bureau of Design and Environment

CONCUR
By: Rachel Leibado
Deputy State Historic Preservation Officer
Date: 7-7-15
Appendix B: Consultation Meetings
Agenda
Champ Clark Bridge Consultation Meeting
August 11, 2015
9:00-11:00 a.m.

Call: 573.526.3993
Conference ID: 67346#

Welcoming Remarks

Procedures (since we’ll all be on teleconference)

Introductions

Review of the alternatives being considered in the Environmental Assessment

Discussion

Status of Section 106

Discussion of appropriate mitigation measures for any adverse effects to Champ Clark Bridge

Next steps
<table>
<thead>
<tr>
<th>Person</th>
<th>Agency</th>
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<th>E-mail</th>
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<td>Kitty Henderson</td>
<td>Historic Bridge Foundation</td>
<td>X</td>
<td><a href="mailto:kitty@historicbridgefoundation.com">kitty@historicbridgefoundation.com</a></td>
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<tr>
<td>Nathan Holth</td>
<td>HistoricBridges.org</td>
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<td><a href="mailto:nathan@historicbridges.org">nathan@historicbridges.org</a></td>
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<tr>
<td>Dennis O'Connell</td>
<td>IDOT District 6 Environmental</td>
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<tr>
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<tr>
<td>Ken Runkle</td>
<td>IDOT Environmental Coordinator</td>
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<tr>
<td>Janis Piland</td>
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<tr>
<td>Charles Hoffman</td>
<td>City of Louisiana, Historic Preservation Agency</td>
<td></td>
<td><a href="mailto:charles3@big-river.net">charles3@big-river.net</a></td>
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<tr>
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<td>Karen Daniels</td>
<td>MoDOT Historic Preservation</td>
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<tr>
<td>Mike Meinkoth</td>
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<td>Keith Killen</td>
<td>MoDOT Northeast District</td>
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<td>Amanda Burke</td>
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<td><a href="mailto:judith.deel@dnr.mo.gov">judith.deel@dnr.mo.gov</a></td>
</tr>
<tr>
<td>Andy Borrowman</td>
<td>Pike County, Illinois</td>
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Raegan Ball, Mo-FHWA welcomed everyone and thanked them for participating in the meeting and the Section 106 consultation process.

Karen Daniels, MoDOT Historic Preservation, reviewed procedures for the conference call, since there were so many locations calling in. She asked everyone to mute their phones when not speaking to reduce background noise, identify themselves when speaking and said she would “call roll” during discussion to keep everyone from speaking at once.

Introductions were made throughout the group. A list of attendees is attached.

Keith Killen, MoDOT Northeast District, reviewed the project. The bridge is 85 years old, structurally deficient, 20’ wide, and narrow for trucks and farm equipment that use the bridge, and it is limited vertically. IDOT and MoDOT have started to prepare an Environmental Assessment (EA) to replace the bridge and address flooding between the bridge and the levy on the Illinois side of the bridge.

The alternatives studied in the EA include:

- No build
- Rehabilitation—the bridge has undergone a couple of rehabilitations in the past
- Partial replacement—use the piers, remove the trusses and build new girders on the piers, this would result in a long closure which would be a hardship for the community
- Construction alternates
  - Existing location—would mean no crossing at the location during construction, causing hardship for the area
  - Far north and Far South—much greater expense and environmental impacts
  - Adjacent upstream
  - Adjacent upstream with an improved alignment which would skew across the existing roadway
  - Adjacent Downstream
  - Adjacent Downstream with a skewed alignment

Those being carried forward in the EA are the no build, the Adjacent Upstream, the Adjacent Upstream with Improved Alignment and the Adjacent Downstream. All these would leave the existing bridge in place through construction.

The floor was opened for discussion of the alternates and any additional alternates that should be discussed. There was no discussion of the alternates or additional alternates.

Karen Daniels reported on the status of the Section 106. In Missouri the architectural and bridge survey had identified several architectural resources and the bridge as eligible for the National Register of Historic Places (NRHP), an archaeological survey would not be conducted until a preferred alternative had been identified and access to property could be obtained to conduct the
survey. In Illinois the architectural survey did not identify any historic buildings, and Illinois had concurred with the recommendations that the bridge is eligible for the NRHP. In Illinois archaeological survey will be needed once a preferred alternative is selected. Brad Koldehoff, IDOT, indicated that deep testing of the preferred alternative would be required.

Karen Daniels said that FHWA had informed the Advisory Council on Historic Preservation (ACHP) of the adverse effect that any of the alternates would have on the historic bridge, and invited them to participate in consultation. The ACHP had chosen not to participate in consultation.

MoDOT had sent out a draft MOA with the basic state level documentation mitigation measures to start discussion on what additional mitigation measures should be done for the Champ Clark Bridge. Inadvertently the draft MOA had omitted advertising the bridge and that oversight has been rectified in the current revision. MoDOT is proposing advertising the bridge for eighteen months, starting July 1, 2015, since the project is currently unfunded that gives us time to try to find someone who might want to use all or part of the bridge, and them time to plan for removal and relocation. The bridge is currently posted on MoDOT’s Free Bridges web-site and the availability will be included in a press event being held on the bridge on August 12.

The floor was opened for discussion of additional mitigation measures that should be considered.

Nathan Holth said that the bridge definitely needed more than just documentation before it was destroyed, but he didn’t have anything in particular in mind. He would like to see a maintenance and preservation plan for the major river bridges in Missouri and Illinois since so many of them have been removed.

Kitty Henderson said that a bridge management plan would be good to help compensate for the major river bridges that have been lost. She said videos, educational materials, interpretive plaques could also be appropriate.

Brad Koldehoff said IDOT is currently updating their historic bridge list, and it could be updated to include similar bridge types.

Rachel Leibowitz, Illinois Historic Preservation Agency, said she was looking at the Oregon Historic Bridge Field Guide (http://www.oregon.gov/ODOT/HWY/BRIDGE/docs/OHBG.pdf -- very large file). She thinks the video on the ftp site is quite interesting and thinks a longer version would be quite interesting. A management plan would be quite interesting but follow through with preservation would be the issue.

Kitty Henderson said looking at an assessment of the remaining bridges and creation of a management plan is nothing without the commitment to preserve one. Texas is doing a program on truss bridges to develop a plan for them. The first step is to see what is out there. Oregon is very committed to saving their historic bridges—they bypass them, use them in one-way pairs, and use design exceptions.
Kitty Henderson asked if there was anything on the list thus far that could be nailed down as a commitment. Karen Daniels said that the video and an interpretive panel could be. MoDOT has done two videos as part of mitigation this last year and although we need a platform to make them available to the public, we think they are a good way to provide additional documentation of certain bridges. She has also been in contact with the City of Louisiana about placing an interpretive panel for the bridge, the City thinks one in the park overlooking the bridge location would be ideal, and has expressed their enthusiastic support.

Rachel Leibowitz said she would like to see something like the field guide and asked Brad Koldehoff if the IDOT could be done sooner. Brad said they are trying to add staff to make updating the inventory easier. They have had discussions with IL FHWA about using federal funds for the project.

Kitty said you can Google the *Oregon Historic Bridge Field Guide* to find it.

Rachel Leibowitz said she would like to see a web-site or OCR code added to the interpretive panel to explain in additional detail and depth the engineering and technology that went into the bridge.

Kitty Henderson said she’s looking beyond this bridge, looking a bit wider to see what we can do to document these bridges in a wider way. She recognizes that there are height and weight restrictions and wants to look at the bigger picture. The interpretive panel needs to look at bridge engineering.

Judith Deel, MoSHPO, said she had three ideas: 1. incorporating into the MOA a commitment to explore doing a programmatic approach for the major bridges, 2. doing a Field Guide for Mississippi River Bridges, and 3. doing 3-D imaging for the bridge. Karen Daniels asked if she meant LIDAR scanning, and Judith confirmed that was what she meant.

Rachael Leibowitz said that she thinks a Field Guide to Mississippi River Bridges for Missouri and Illinois sounds like a great idea.

Judith Deel said that any place with public oriented information centers, such as the Great River Road welcome and interpretive centers, would be a good place to put information.

No additional ideas were put forth.

The next steps are for IDOT and MoDOT to identify their major river trusses and discuss with their bridge divisions the prospects of developing preventative maintenance plans/preservation plans for the bridges, and be able to report back. The group should plan on meeting again in about one month to try to finalize mitigation measures so the MOA can be finalized.
Champ Clark Bridge Consultation  
Route 54 over the Mississippi River  
Pike County, Illinois & Pike County, Missouri  

September 28, 2015  
1:30 – 3:30 p.m.

Agenda

601 W. Main, IS-2

Teleconference call in # 573-526-3993, conference ID: 67346#

Welcome

Introductions

Mitigation that MoDOT will be doing
    Historic context
    Interpretive panel on Champ Clark Bridge for display at Riverview Park
    Archival photography to National Register Standards
    Advertising availability of bridge for reuse in place or new location for 18 months

Additional Mitigation ideas discussed at the last meeting
    Maintenance/preservation plans for major river bridges
    Videos
    Educational materials—field guide, etc.
    Interpretive panels
    LIDAR imaging

Finalize mitigation measures

Discussion of any additional issues to be addressed in Memorandum of Agreement

Next steps

Adjourn
### September 28, 2015 Consultation Meeting

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*Note: Attended X indicates attendance at the meeting.*
Gayle Unruh welcomed everyone to the meeting and thanked them for participating in the Section 106 process.

Introductions were made among the participants. A list of participants is attached.

Karen Daniels reviewed the mitigation measures that the Missouri Department of Transportation (MoDOT) had previously agreed to do:

- **A historic context** similar to those prepared for other major river crossings will be prepared. This document will discuss the planning for and construction of the Champ Clark Bridge as well as the impact it had on the surrounding communities.

- **Archival photography** will be done to National Register standards. For many of our major river bridges it had not been possible to get photographs of the bridge details from the bridge deck because of the traffic volume and the difficulty of closing a traffic lane on the structures. Karen took advantage of the bridge closure for the inspection in August 2015 and did the detail photography for the mitigation at that time, so the mitigation package for Champ Clark will include bridge details taken from on the bridge. This gave us an idea for future major bridges, to coordinate this kind of photography with the inspections, since we usually have a sufficiently long timeline the bridge will usually be closed at least once for inspection.

- **Advertising** the availability of the bridge. The bridge is currently on the Free Bridges web-site and will be up until December 2016. The bridge has been marketed to local governments, historical societies, trail groups, and state parks. Press releases about the availability of the bridge have been prepared and Marissa Ellison, the Northeast District Communications Director, is working to identify additional potential interested parties to market to. The web-site [www.champclarkbridge.com](http://www.champclarkbridge.com) will be converted from the EA public input web-site into a way to advertise the bridge and post the history of the bridge.
  - Karen reported that she has had one inquiry about the bridge from a woman in Louisiana who is interested in preserving the bridge in place as a pedestrian bridge.

- **An interpretive panel** at Riverview Park—we’ve talked with the City of Louisiana and they are enthusiastically supportive of the idea of an interpretive panel overlooking the bridge location.

Additional mitigation ideas had been discussed at our August meeting, and needed additional research or consideration.

- **A preventative maintenance plan** for the preservation of major river bridges—Karen Daniels reported that they had consulted with the Bridge Division. Two bridges were identified as being constructed before 1970 and having some “life left on them” by Bridge—the Liberty Bride in Jackson County and the Martin Luther King, Junior Bridge in St. Louis City. The Bridge Division believes that it will be possible to get another 20 to
25 years of service out of the bridges, however they have passed the tipping point for long term preservation due to advanced section loss and pack rust in built up members. We don’t have good candidates for a preventative maintenance plan for major river bridges in Missouri.

- **Videos**—MoDOT is willing to include video as part of the mitigation package, however we would like to know what the parties would like the video to include. The two videos that we have done as part of bridge mitigation in the past were for Kimberling City which was a rehab project and Sinking Creek where we wanted to catch the setting before a temporary bridge was constructed. So this project will be rather different for us. Kitty Henderson suggested contacting Rachel Leibowitz about the video content, since she had been very interested in this form of mitigation at our last meeting. Judith Deel suggested obtaining extra footage focusing on the river traffic, eagles and agricultural equipment use of the bridge; it would give people an idea of the scale of the bridge. Karen Daniels asked if agricultural equipment was still allowed to use the bridge. Keith Killen said that it is, as long as it is less than forty tons, and they arrange with police to close the bridge so they can cross. Raegan Ball said the video should incorporate what makes the bridge historic. Kitty said it should be an expansion of the interpretive panel.

- **Educational/Interpretive Materials**—
  - MoDOT owns the web domain www.champclarkbridge.com, which is currently being used for the public input for the EA. Karen Daniels reported that she’s spoken with Marissa Ellison, and Marissa would like to transition the web page to bridge marketing and bridge history, so we will be able to include public friendly historical materials about the bridge and include links to the web site on other materials.
  - There had been a lot of discussion of the Oregon Bridge Field Guide at the last meeting. Karen Daniels said something of that magnitude was beyond what MoDOT would consider for mitigation for this project, however Oregon had also done a brochure, *Spanning Oregon’s Coast*, which was sent to everyone prior to the meeting, which she and Mike Meinkoth had discussed and MoDOT is willing to produce something along the lines of that brochure for the major river bridges. A brochure for the Mississippi River Bridges can be done in cooperation with IDOT and we can do a brochure for the Missouri River Bridges.

- **LIDAR scanning**—Karen Daniels reported that MoDOT apparently owns the equipment to do 3D scanning of the bridge, and the section of the Design Division that owns the equipment is including in the job description for the operator to assist the Environmental and Historic Preservation Section with mitigation of historic buildings and bridges, so getting LIDAR scanning done for the bridge should not be an issue.

Karen Daniels said that Nathan Holth had sent her an idea before the meeting for consideration. If the bridge has to be removed, salvaging materials from it to build the supports for the interpretive panel and had included a plan sheet showing how PennDOT had done so. Karen reported that she had forwarded the plan to Keith Killen, the project manager for MoDOT and asked if it would be possible to include a job special provision (JSP) in the contract to salvage sufficient materials to build the base. Keith’s response had been that the cost would be reasonable, so a JSP will be included in the project if the bridge comes down materials will be salvaged and reused in the interpretive panel supports.
Karen Daniels also said that a JSP will be included for the removal of the bridge plaques, which will be given to the City of Louisiana, which wants them for the museum. The question was asked if we needed to offer a set of the plaques to Pike County, Illinois, and Karen said that she contact the County and the County Historical Society and see if they would be interested in having them.

Karen Daniels said that the Memorandum of Agreement (MOA) will have programmatic approaches for archaeological surveys which still need to be conducted in Missouri and deep testing which needs to be done in Illinois. Brad Koldehoff said that they have concurrence from the Illinois SHPO on that concept.

Karen Daniels reported that Raegan Ball, Mike Meinkoth and herself had a conversation about the MOA shortly after the last meeting. Raegan wanted to make sure that in the next version the responsibilities of the various parties were clearly spelled out—what IDOT was doing, what MoDOT was doing, that IL FHWA would oversee IDOT, and that MoFHWA would oversee MoDOT. Brad Koldehoff asked if who was responsible for the bridge would be spelled out. Karen said that the revised MOA would specify that MoDOT would be responsible for the bridge. Brad asked if the roles of the SHPO should be spelled out. Karen said it would be easy to add that the IL SHPO would review the Illinois side of the project, the Missouri SHPO would review the Missouri side of the project, and as the lead MoDOT would consult with the Missouri SHPO about the adequacy of the photography and be asked to review the historic context and photographs, IL SHPO would receive a copy.

Kitty Henderson said that she would like for the consulting parties to be able to review the interpretive and educational materials (panels, brochures, web-site, etc.) before they are published and have input into those. She commented that in the past she has discovered mistakes and it would provide another set of eyes. Karen Daniels said that allowing for review would not be an issue.

Judith Deel asked if it would be possible to put a blurb on the Historic Bridge Foundation web-site requesting old photographs and family stories about the Champ Clark Bridge. Kitty Henderson said that the next newsletter goes out November 1, and if Karen gets her a short blurb, she’ll be happy to include it in the newsletter.

Karen Daniels mentioned that there are construction photographs of the Champ Clark Bridge in the Illinois State Archives. She knows that the photographer who documented the construction of the bridge donated his archives to the state and they are housed there. To the best of her knowledge the collection has not been digitized. Brad Koldehoff said that IDOT would be happy to assist in getting the images from the Illinois State Archives.

Karen Daniels said that she would try to get a revised MOA out for review and comment by the end of the year. Hopefully there would be few changes necessary then to finalize it and we would be able to start the signing process.

The meeting adjourned.
Appendix C: Public Meeting Summaries and Cultural Displays
November 8, 2012
Public Meeting Summary

The first public meeting for the U.S. Route 54 Mississippi River Bridge Environmental Assessment was held in Louisiana, MO on Thursday November 8, 2012 from 5 p.m. until 6:30 p.m. at the Twin Pike Family YMCA. Advertisements were placed in the Pittsfield Pike Press, the Bowling Green Times, and the Louisiana Press Journal. A news release was sent out October 29 highlighting the upcoming meeting and the website where the displays are available and comments could be made online at www.modot.org/northeast.

Displays available included “Environmental Constraints”, Existing Bridge Conditions”, “Why Improvements are Needed”, “Champ Clark Bridge Facts”, “EA Process” and “Cultural and Environmental”. In addition a handout was provided and cards was available that promoted the ChampClarkBridge.com website.

Six MoDOT staff attended the public meeting including four from the Northeast District and two from the Central Office Environmental Section. Two representatives from the Illinois Department of Transportation attended the meeting as well.

Thirty-nine community members attended the public meeting as well as one television station and two newspapers. Seven written comments were received at the meeting and two comments were received by email. Maintaining access across the river during construction of a new bridge is essential for residents and businesses. There were several questions about the project including schedule, bridge location, potential right of way acquisition and project costs. Comments regarding bridge location included constructing a new bridge just north or just south of the existing bridge or locating a new bridge south near the railroad bridge. Other comments received at the meeting included inquiring if a ferry would be provided if the bridge were replaced in the same location, providing room for bicyclists and one encouraging MoDOT and IDOT to ensure the existing bridge is as safe as possible in the interim.
Section 106 Process

Section 106 of the National Historic Preservation Act requires federal agencies, and the recipients of federal dollars, to consider the effects of their projects on “historic properties”. Historic properties are defined as:

Any historic or prehistoric site, district, building, structure or object included on, or eligible for inclusion on the National Register.

Some examples include nationally significant resources, such as the Eads Bridge in St. Louis, resources of statewide significance, such as the University of Missouri campus in Columbia, and of local significance, such as the Louisiana Public Library.

A systematic process is undertaken to identify historic properties, analyze potential effects on them, and determine what action will need to be taken to eliminate or mitigate those effects. This is commonly referred to as the “Section 106 Process”. The process is outlined below.

1 Establish Area of Potential Effects (APE)

The area of potential effects (APE) is the area or areas where a project might have effects on historic properties. Each alternative considered for a project will have an APE.

2 Identify Resources and their Significance

Archival research and field surveys are conducted to identify historic properties within the APE. The significance and integrity of the properties are documented. The State Historic Preservation Officer (SHPO) is consulted about the findings.

3 Determination of Project Effects

The study team determines how the project might affect historic properties within the APE, considering direct and indirect effects. If a resource is adversely affected, options for eliminating or mitigating those effects are considered. This could include changing the location of the improvements or making adjustments in the design to lessen the effects.

4 Resolve Adverse Effects

Decisions regarding adverse effects on historic properties are formalized in a legally binding Memorandum of Agreement that becomes part of the study’s official documentation. It spells out what measures will be taken to mitigate the project effects on historic properties.

MoDOT hopes you, the public, will inform us of any properties you consider important. You can do this by leaving a comment on the public meeting response form or speaking with the representative of the Historic Preservation Section at the meeting.

Additional information can be found at http://www.modot.mo.gov/ehp/HistoricPreservation.htm.
The Champ Clark Bridge is a 5-span, Pennsylvania through truss with 6 steel plate deck girder approach spans on the East end. It was built between 1926 and 1928 for the Missouri-Illinois Bridge Company and cost $1,000,000 to construct. It opened on May 15, 1928 and operated as a toll bridge until 1952, when it was freed.

A comprehensive survey of historic resources of Louisiana has not been conducted. A survey of the project area will need to be conducted for the project. Archaeological surveys will need to be conducted in Missouri and Illinois. Architectural resources will need to be photographed and researched to determine if they have historical significance.

North Third Street Historic District is roughly bounded by Georgia, Noyes, North 3rd Street and North Water Street. The district is significant in the areas of architecture and community planning & development, with a period of significance of 1843-1935. It is predominantly residential in nature, and contains some of the oldest homes in Louisiana.
March 21, 2012
Public Meeting Summary

The second public meeting for the U.S. Route 54 Mississippi River Bridge Environmental Assessment was held in Louisiana, MO on Thursday March 21, 2012 from 5 p.m. until 6:30 p.m. at the Twin Pike Family YMCA. Advertisements were placed in the Pittsfield Pike Press, the Bowling Green Times, and the Louisiana Press Journal. A news release was sent out March 21 highlighting the upcoming meeting and the website where the displays are available and comments could be made online at www.modot.org/northeast.

Displays available included “No Build and Rehabilitation Alternatives”, “Partial Replacement and Existing Location Alternative”, “Upstream Alternative”, “Downstream Alternative”, “Upstream Alternative with Improved Alignment”, “Skewed Downstream Alternative”, “Eliminated Alternatives” and “Environmental Assessment Process”. In addition two handouts were provided, the first was “Pros & Cons for each alternative” and the second was a comment form for the public to provide feedback regarding each alternative.

Five MoDOT staff attended the public meeting including four from the Northeast District and one from the Central Office Environmental Section. One representative from the Illinois Department of Transportation attended the meeting as well.

Sixty community members attended the public meeting. Local media in attendance included two television stations and two newspapers. Fifteen written comments were received at the meeting and seven comments were received by email. The Upstream Alternative (Red) and Downstream Alternative (Green) received the most support with the Adjacent Upstream with Improved Alignment Alternative (Yellow) also receiving supportive comments. One preferred the Partial Replacement Alternative and one preferred the Existing Location Alternative if a ferry could be provided during construction. Maintaining access across the river during construction was a consistent theme. Several in the community said addressing the Route 54 and Route 79 intersections were needed including bigger intersections for large trucks and maintaining access to the historic downtown area.
October 2, 2013
Public Meeting Summary

The third public meeting for the U.S. Route 54 Mississippi River Bridge Environmental Assessment was held in Louisiana, MO on Tuesday October 2, 2013 from 4:30 p.m. until 6:00 p.m. at the Twin Pike Family YMCA. Advertisements were placed in the Pittsfield Pike Press, the Bowling Green Times, the People’s Tribune and the Louisiana Press Journal. A news release was sent out September 20 highlighting the upcoming meeting and the website where displays would be available and comments could be made online at www.modot.org/northeast.

Displays presented concerning the bridge included “Where are we in the EA process”, “Adjacent Upstream Alternative”, “Adjacent Downstream Alternative”, “Adjacent Upstream Alternative with Improved Alignment” and “Bridge Alternatives Comparison Table”. Displays focusing on the intersection of Route 54 and MO 79 South included “Option 1”, “Option 2”, “Option 3”, “Option 4” and “Options Comparison Table”. In addition a comment form was provided for the public to provide feedback regarding the bridge alternatives and each option for improving the Route 54 and MO 79 South intersection.

Six MoDOT staff attended the public meeting including four from the Northeast District and two from the Central Office Environmental Section. Two representatives from the Illinois Department of Transportation attended the meeting.

Fifty-one community members attended the public meeting. Local media in attendance included two newspapers. Nine written comments were received at the meeting regarding the bridge alternatives. The Upstream Alternative (Red) and Downstream Alternative (Green) each received 3 comments supporting the alternatives with others having them as their second choice. The Adjacent Upstream with Improved Alignment Alternative (Yellow) received two supportive comments. Other comments received stressed minimizing the impact to the marina and businesses were important. An additional comment asked about reusing the existing piers which was previously considered but eliminated due to the required bridge closure and lengthy detour.

Eight written comments were received at the meeting regarding improving the intersection of Route 54 and MO 79 South. Five recommended Option 1 due to its minimizing impacts to the existing businesses with one commenting this option would not solve the intersections issues. One comment recommended Option 2 while two others had it as their second choice. No one recommended Option 3 however some commented that Option 2 and Option 3 could be moved closer to existing Route 54. Option 4 had one supporting comment and six comments against. Those opposed cited impacts to businesses and increased costs as reasons for not supporting Option 4.
The Missouri Department of Transportation understands that members of the community know the history of their community, and its buildings, better than we do. If you are aware of any buildings within the project study area that you think we should give consideration to for meeting the National Register criteria, please speak with the representative at the meeting, make a note on the comment form, or call 888-ASK-MoDOT and ask to speak with Karen Daniels.

Additional information can be found at http://www.modot.mo.gov/ehp/HistoricPreservation.htm.
Archaeological Investigations

Archaeological investigations will focus on properties dating to the late-nineteenth century, as seen on this portion of the Bird’s Eye View of the City of Louisiana published in 1876. (Courtesy of the Louisiana Area Historical Museum.)

Historical research, including analysis of maps and census records, indicates that the current project area was occupied by multiple households during the second half of the nineteenth century. MoDOT archaeologists are evaluating the potential for remains of these households, as well as prehistoric sites, to remain buried and intact.

Historical archaeology often focuses on the excavation of "features" such as privies, water closets, wells, cisterns, ash pits, cellars, and trash middens. The types of artifacts often recovered include dishes, bottles, toys, medical supplies, clothing, tobacco pipes, tools, and many other domestic and personal items.

Excavation of an oval-shaped privy, with highway traffic rushing by in the background.

A team of archaeologists excavated a brick-lined cistern which was used during the 19th-century to collect rain water for drinking, cooking, and washing. This feature was used from the 1850s until the 1890s.

Excavation of a stone-lined privy (out-house): as an archaeologist carefully measures the depth of the excavation, a second researcher takes notes. This feature was located behind a house built during the late-1840s, and occupied by the same family until the 1880s.