

**MEMORANDUM OF AGREEMENT
AMONG THE
FEDERAL HIGHWAY ADMINISTRATION,
ILLINOIS STATE HISTORIC PRESERVATION OFFICER,
CHICAGO DEPARTMENT OF TRANSPORTATION,
AND
ILLINOIS DEPARTMENT OF TRANSPORTATION
REGARDING THE REHABILITATION OF THE
FAU 1570 / 100TH STREET BRIDGE OVER THE CALUMET RIVER
IN THE CITY OF CHICAGO, COOK COUNTY, ILLINOIS**

WHEREAS, the Chicago Department of Transportation (CDOT), in coordination with the Illinois Department of Transportation (IDOT), proposes to rehabilitate the 100th Street Bridge over the Calumet River (Structure #016-6042) in Chicago, Cook County, Illinois (IDOT Sequence #25987, SHPO Log #025031425) (Project); and

WHEREAS, the Federal Highway Administration (FHWA) may fund the Project thereby making the Project an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA), 54 U.S.C. Section 306108, and its implementing regulations, 36 CFR Part 800; and

WHEREAS, the 100th Street Bridge is subject to the “Programmatic Agreement Among the Federal Highway Administration, Illinois Department of Transportation, Chicago Department of Transportation, Illinois State Historic Preservation Officer, United States Army Corps of Engineers, United States Coast Guard and Advisory Council on Historic Preservation Regarding the Preservation of Movable Bridges in the City of Chicago, Cook County, Illinois” (Movable Bridge PA), which was ratified on January 29, 2021, and its implementing Chicago’s Movable Bridges Preservation Plan; and

WHEREAS, the IDOT, on behalf of the FHWA, has defined the undertaking’s area of potential effects (APE) as the area shown in Exhibit A; and

WHEREAS, the IDOT, on behalf of the FHWA, and in consultation with the Illinois State Historic Preservation Officer (Officer), has determined that the 100th Street Bridge over the Calumet River is eligible for the National Register of Historic Places (NRHP), and found that the rehabilitation will have an adverse effect on this historic property pursuant to 36 CFR Part 800 (Exhibit B); and

WHEREAS, the IDOT, on behalf of the FHWA, has found that the undertaking will not adversely affect historic properties other than the 100th Street Bridge over the Calumet River, and the Officer did not object to this finding within 30 days; and

WHEREAS, this Memorandum of Agreement (MOA) addresses the adverse effect on the 100th Street Bridge over the Calumet River; and

WHEREAS, the FHWA and IDOT provided consulting parties opportunities to participate in the identification of historic properties in APE, assessing the Project's effects on historic properties, and the resolution of adverse effects. Consulting party letters and meeting invitations were sent for each of these steps to ten consulting parties, as designated in the Movable Bridge PA: Advisory Council on Historic Preservation; U.S. Coast Guard (USCG); U.S. Army Corps of Engineers (USACE); City of Chicago Planning, Design, and Historic Preservation Division; Landmarks Illinois; Historic Bridge Foundation; Friends of the Chicago River; Chicago History Museum; Preservation Chicago; and HistoricBridges.org. Four parties participated in consultation: the City of Chicago Planning, Design, and Historic Preservation Division, Landmarks Illinois, Preservation Chicago, and HistoricBridges.org; and

WHEREAS, the FHWA and IDOT provided the public opportunities to comment on the Project during public information meetings held on September 30, 2024 and September 8, 2025, consistent with 36 CFR Part 800.2(d)(3); and

WHEREAS, the IDOT, on behalf of the FHWA, in accordance with 36 CFR Part 800.6(a)(1), notified the ACHP of the adverse effect on November 5, 2025, and the ACHP elected not to participate in consultation on November 24, 2025, pursuant to 36 CFR Part 800 6(a)(1)(iii); and

WHEREAS, the FHWA has consulted with the IDOT and the CDOT regarding the effects of the undertaking on historic properties and has invited them to sign this MOA as an invited signatory; and

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

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

STIPULATIONS

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

I. ARCHITECTURAL AND HISTORICAL RESOURCE MITIGATION

A. Interpretive Panel Design and Installation:

1. The IDOT will design an interpretive panel regarding the 100th Street Bridge. At a minimum, the panel's contents shall cover the significance of the bridge as a historic property and the social history of the community(ies) linked to the bridge with respect to transportation and/or economics. A draft panel design will be completed no later than six (6) months after the bridge rehabilitation has concluded. The IDOT will submit the draft panel to the Officer and other consulting parties for review. Comments received by the IDOT within 30 days of receipt will be taken into account in finalizing the panel content.
2. The CDOT will manufacture and install the interpretive panel in a publicly accessible area near the 100th Street Bridge no later than twelve (12) months after the bridge rehabilitation has concluded.

B. Public Dedication/Community Event: No later than six (6) months after the interpretive panel is installed, the CDOT will host a public dedication event. The CDOT will advertise the public event within the local community. The agenda for the event will be determined by the CDOT, in consultation with the IDOT and the Officer. The event may include a celebration of the 100th Street Bridge's reopening, highlighting the local area's history and ties to the Calumet River. The CDOT will submit a draft event agenda to the IDOT and the Officer for comment. Comments received by the CDOT within 30 days of receipt will be taken into account in finalizing the event agenda.

II. PROFESSIONAL STANDARDS

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

III. DURATION

This MOA will expire if its stipulations are not carried out within five (5) years from the date of its execution, unless otherwise amended or terminated pursuant to Stipulations VI or VII. In such an event, the FHWA shall so notify the parties to this MOA and, if it chooses to continue with the Project, then the FHWA shall reinstate review of the Project in accordance with 36 CFR Part 800.

IV. POST-REVIEW DISCOVERIES

If potential historic properties are discovered or unanticipated effects on historic properties found, the FHWA shall make reasonable efforts to avoid, minimize, or mitigate adverse effects to such properties and follow the requirements of 36 CFR Part 800.13(b).

V. DISPUTE RESOLUTION

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

- A. Forward all documentation relevant to the dispute, including any timely advice or comments regarding the dispute from the ACHP and signatories and the FHWA's proposed resolution, to the ACHP in accordance with 36 CFR Part 800.2(b)(2). The ACHP shall provide FHWA with its advice on the resolution of the objections within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, FHWA shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP and signatories and provide them with a copy of this written response. FHWA will then proceed according to its final decision.
- B. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period FHWA may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, FHWA shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories to the MOA and provide them and the ACHP with a copy of such written response.
- C. FHWA's responsibility to carry out all other actions subject to the terms of this MOA that are not the subject of the dispute remain unchanged.

VI. AMENDMENTS

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

VII. TERMINATION

If any signatory to this MOA determines that its terms will not or cannot be carried out, that party shall immediately consult with the other parties to attempt to develop an amendment. If within thirty (30) days an amendment cannot be reached, any signatory may terminate the MOA upon written notification to the other signatories. Once the MOA is terminated and prior to work continuing on the undertaking, FHWA must request, take into account, and respond to the comments of the ACHP under 36 CFR Part 800.7. FHWA shall notify the signatories as to the course of action it will pursue.

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

(Signature Pages Follow)

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AMONG THE
FEDERAL HIGHWAY ADMINISTRATION,
ILLINOIS STATE HISTORIC PRESERVATION OFFICER,
CHICAGO DEPARTMENT OF TRANSPORTATION,
AND
ILLINOIS DEPARTMENT OF TRANSPORTATION
REGARDING THE REHABILITATION OF THE
FAU 1570 / 100TH STREET BRIDGE OVER THE CALUMET RIVER
IN THE CITY OF CHICAGO, COOK COUNTY, ILLINOIS**

Signatory

FEDERAL HIGHWAY ADMINISTRATION

By: Darien B. Siddall Date: 2/18/2026

Print Name: Darien Siddall

Title: Environmental Protection Specialist

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Signatory

ILLINOIS STATE HISTORIC PRESERVATION OFFICER

By: Carey L. Mayer Date: 2/10/2026

Print Name: Carey L. Mayer, AIA

**Title: Deputy State Historic Preservation Officer
Illinois Department of Natural Resources**

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Invited Signatory

CHICAGO DEPARTMENT OF TRANSPORTATION

By:  Date: February 5, 2026

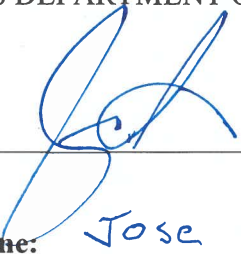
Print Name: Craig Turner, PE, PLS

Title: Acting Commissioner

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Invited Signatory

ILLINOIS DEPARTMENT OF TRANSPORTATION

By:  _____ Date: 2/17/26

Print Name: Jose Rios
Title: Region 1 Engineer

Exhibit A: Area of Potential Effects Map

Area of Potential Effects Map

East 100th Street Bridge over Calumet River



Exhibit B: Adverse Effect Finding



Illinois Department of Transportation

Memorandum

To:	Greg Lupton	Attn:	Steven Letsky
From:	Jack Elston	By:	Joseph Galloy
Subject:	Adverse Effect – MOA Required		
Date:	November 5, 2025		

**Cook County
Chicago
FAU 1570 / E. 100th Street
Bridge Rehabilitation
Structure # 016-6042
Section # 18-E8308-00-BR
IDOT Sequence # 25987
SHPO Log # 025031425**

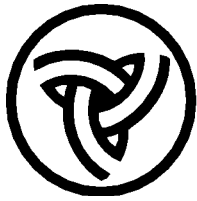
Adverse Effect – IDOT in coordination with FHWA has made a finding of “Adverse Effect.” Pursuant to their cultural review as required under Section 106 of the National Historic Preservation Act of 1966, the State Historic Preservation Officer (SHPO) has not responded to this project review within the allotted 30 days (see attached letter dated October 1, 2025). Therefore, in accordance with 36 CFR 800.3(c)(4), the Section 106 process will move to the next step.

Per 36 CFR 800.6(1), IDOT Cultural Resources Unit (CRU) will notify the Advisory Council on Historic Preservation of the Adverse Effect finding and afford them an opportunity to participate in consultation for the undertaking. After completing additional consultation with the undertaking’s consulting parties, IDOT CRU will develop a draft memorandum of agreement (MOA) that will include stipulations to mitigate the Adverse Effect finding, which will be disbursed for review and comment by the parties involved in the undertaking.

A handwritten signature in cursive script, reading 'Joseph M. Galloy'.

Joseph M. Galloy, PhD, RPA
Cultural Resources Unit Manager
Bureau of Design & Environment

JG:el
Attachment



Illinois Department of Transportation

2300 South Dirksen Parkway / Springfield, Illinois / 62764

October 1, 2025

Cook County
Chicago
FAU 1570 / E. 100th Street
Bridge Rehabilitation
Structure # 016-6042
Section # 18-E8308-00-BR
IDOT Sequence # 25987
SHPO Log # 025031425

FEDERAL 106 PROJECT – *Assessment of Adverse Effects – Request for Comment*

Ms. Carol J. Wallace
Cultural Resources Coordinator
Illinois State Historic Preservation Office
Illinois Department of Natural Resources
1 Natural Resources Way
Springfield, Illinois 62702

Dear Ms. Wallace:

The Chicago Department of Transportation (CDOT) and the Federal Highway Administration (FHWA), with administrative oversight from the Illinois Department of Transportation (IDOT), propose to rehabilitate Structure # 016-6042 carrying E. 100th Street over the Calumet River in Chicago. This undertaking is classified as a Categorical Exclusion under the National Environmental Policy Act (NEPA).

The purpose of this letter is to continue Section 106 consultation, specifically pertaining to the assessment of adverse effects pursuant to 36 CFR Part 800.5 and in accordance with Stipulation 1.D of the *Programmatic Agreement Regarding the Preservation of Movable Bridges in the City of Chicago* (the PA) and its implementing *Chicago Movable Bridges Preservation Plan* (the Plan).

The subject bridge is a “second generation” Chicago-type trunnion bascule bridge built between 1925–1927 that was determined eligible for listing on the National Register of Historic Places (NRHP) by the State Historic Preservation Officer (SHPO) in 2017 (SHPO Log #013022514). The bridge is NRHP-eligible under Criterion A as an iconic feature of the Chicago landscape and because construction of the bridge was necessary for Chicago’s economic development in the twentieth century, as well as under Criterion C for its “architectural and mechanical attributes.” The Period of Significance for the bridge is 1927 (its date of construction) through 1967 (the fifty-year cut-off from when the bridge was determined eligible).

Summary of Previous Section 106 Consultation

- On July 1, 2024, CDOT, IDOT, FHWA, SHPO, and United States Army Corps of Engineers (USACE) attended a field visit to the 100th Street Bridge.

- On March 14, 2025, your office was notified of IDOT's determination of the Area of Potential Effects (APE) for this project, which encompasses a roughly 0.25-mile radius surrounding the bridge. On March 21, 2025, your office concurred with IDOT's identification of historic properties, which include the following NRHP-eligible properties: (1) 100th St. Bridge (Structure #016-6042) [subject bridge]; (2) Lake Shore & Michigan Southern Railway, East Vertical Lift Bridge; (3) Lake Shore & Michigan Southern Railway, West Vertical Lift Bridge; (4) Pittsburgh, Fort Wayne & Chicago Railway Vertical Lift Bridge; (5) Chicago Skyway Toll Bridge; (6) Norris Grain Company Concrete Storage Tanks; and (7) S. H. Bell Company (former Chicago Ship Building Company South Plant, including associated slips, former dry docks).
- On July 14, 2025, CDOT transmitted letters to consulting parties which contained additional information about the proposed scope of work, and which requested comments on the undertaking's proposed scope and its effects on historic properties. The letter included an assessment of effects report, in which CDOT's consultant recommended that the project will have no adverse effect on any historic properties.
- On July 17, 2025, a virtual consulting parties meeting was held as a follow-up to the July 14, 2025, letter. Attendees included CDOT, SHPO, FHWA, IDOT, Preservation Chicago, City of Chicago – Landmarks Division, and Landmarks Illinois.

Scope of Work and Assessment of Adverse Effects

Overall, the subject bridge is in poor condition and requires improvements to safely operate for vehicular, pedestrian, and waterway traffic. In summary, CDOT proposes to conduct major rehabilitation work to the bridge, including rehabilitating fixed span truss members; replacing all moveable span truss members, roadway grating, stringers, bracing, and floorbeams in-kind; rehabilitating the existing bridge houses, including replacing windows and restoring the historic cornice design; partially filling the deck grating with concrete for bike lanes; replacing sidewalk components; and installing a modified version of the original railing design. Please see the July 14, 2025 letter for more thorough details on the scope of work.

As listed in the July 14, 2025 letter and during the July 17, 2025 consulting parties meeting, the CDOT evaluated four alternatives for this undertaking. As detailed in their letter and meeting, CDOT selected Option 3 because it was identified as the feasible and prudent alternative that also meets the Project Purpose and Need. Although the selected alternative retains and repairs the fixed trusses, it removes the bridge's movable trusses over the river and replaces them in-kind. The project will also remove and replace important components of the machinery, such as the rack, pinion, motor and machinery brakes; the limestone parapet walls adjacent to the bridge houses; as well as all the historic windows in the bridge house. Although CDOT's consultant recommended that these activities will have no adverse effect on the 100th Street bridge, IDOT Qualified Staff finds that the removal of the extant historical materials is a major alteration that does not meet the Secretary of the Interior's Standards for Rehabilitation (the Standards) and will have an adverse effect on this historic property.

The selected alternative does not meet Standard 2, which states that the "historic character of a property will be retained and preserved. The removal of distinctive materials or alteration of features, spaces and spatial relationships that characterize a property will be avoided." The

proposed alternative will remove and replace much of the truss superstructure. The trusses, which are the most visible character-defining feature of the bridge, are all original members apart from four gusset plates and a bottom chord. Apart from some repairs to the bottom chords, the trusses retain historical integrity as original components that make up the fabric and design of the superstructure. Removing and replacing the original removable span trusses, instead of retaining and preserving components that are in good condition, or which are deteriorated but repairable, significantly diminishes the structure's historical integrity and fails to meet Standard 2's principle of retaining and preserving the historic character of a property.

The selected alternative also does not meet Standard 5, which states "Distinctive materials, features, finishes and construction techniques or example of craftsmanship that characterize a property will be preserved." Extant historic materials comprising the truss superstructure are proposed to be removed, and the original rivets—demonstrating the bridge's original construction techniques and craftsmanship—will be replaced with bolts on the fixed spans and the replacement movable spans. Therefore, the distinctive construction and engineering techniques that are exhibited in the 100th Street Bridge will be lost.

Additionally, the selected alternative does not follow the first part of Standard 6, which states that "Deteriorated historic features will be repaired rather than replaced..." The part of Standard 6 regarding the acceptable practice for replacing severely deteriorated features of a historic resource in-kind applies to individual components of a resource.

The selected alternative proposes substantial superstructure replacement; therefore, the selected alternative does not follow the Standards. The proposed replacement of much of the visible and extant operational historical features will diminish the bridge's historical integrity of design, materials, workmanship, feeling, and association. The selected alternative that will remove and replace character-defining features of the historic bridge is a major alteration that does not meet the Standards and constitutes an Adverse Effect.

Regarding the other historic resources in the APE, none will be adversely affected by the undertaking. The Lake Shore & Michigan Southern Railway Vertical Lift Bridges; the Pittsburgh, Fort Wayne & Chicago Railway Vertical Lift Bridge; the Chicago Skyway Toll Bridge; the Norris Grain Company Concrete Storage Tanks, and the S. H. Bell Company will be visually impacted by the project particularly during construction, but the visual impacts of the construction work will not cause any adverse effects as the majority of the bridge trusses will undergo in-kind replacement and the bridges houses will be repaired. Temporary auditory impacts during construction are expected but will not have adverse effects on the historic resources. Overall, IDOT proposes that the project will not result in any adverse effects on the remaining resources in the APE.

Therefore, in coordination with FHWA, IDOT requests comments from the State Historic Preservation Officer (SHPO) regarding IDOT's assessment of adverse effects. In summary, IDOT has found that the project will have No Adverse Effect on the Lake Shore & Michigan Southern Railway Vertical Lift Bridges; the Pittsburgh, Fort Wayne & Chicago Railway Vertical Lift Bridge; the Chicago Skyway Toll Bridge; the Norris Grain Company Concrete Storage Tanks, and the S.

H. Bell Company; however, the undertaking will have an Adverse Effect on the 100th Street Bridge (Structure # 016-6042), which is accorded protection under Section 106 of the National Historic Preservation Act.

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

Sincerely,

A handwritten signature in black ink, reading "Joseph M. Galloy". The signature is fluid and cursive, with the first name "Joseph" and last name "Galloy" clearly legible.

Joseph M. Galloy, PhD, RPA
Cultural Resources Unit Manager
Bureau of Design & Environment

JG:el

cc: Ms. Dijana Cuvalo, City of Chicago – Historic Preservation Division
Ms. Kendra Parzen, Landmarks Illinois
Mr. Ward Miller, Preservation Chicago
Col. Kenneth P. Rockwell, USACE
Mr. Michael Anderson, Chicago History Museum
Mr. Michael Odell Walker, US Coast Guard, Ninth District
Ms. Margaret Frisbie, Friends of the Chicago River
Mr. Nathan Holth, HistoricBridges.org
Ms. Kasey Miller, Advisory Council on Historic Preservation
Mr. Stephen Letsky, IDOT Bureau of Local Roads and Streets
Mr. Mayur Patel, Chicago Department of Transportation