

**MEMORANDUM OF AGREEMENT
AMONG THE
FEDERAL HIGHWAY ADMINISTRATION,
ILLINOIS STATE HISTORIC PRESERVATION OFFICER,
ILLINOIS DEPARTMENT OF TRANSPORTATION,
AND
PIKE COUNTY HIGHWAY DEPARTMENT
REGARDING THE
REPLACEMENT OF THE 251st STREET BRIDGE
OVER BLUE CREEK
NEAR DETROIT, PIKE COUNTY, ILLINOIS**

WHEREAS, the Pike County Highway Department (PCHD), in coordination with the Illinois Department of Transportation (IDOT), plans to carry out replacement of the 251st Street Bridge over Blue Creek (Structure #075-0056) near Detroit, Pike County, Illinois (IDOT Sequence #25678, SHPO Log #005080924 [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 FHWA has defined the undertaking's architectural area of potential effects (APE) as the corridor shown in Exhibit A; and

WHEREAS, the FHWA has consulted with the Illinois State Historic Preservation Office (Officer), a Division of the Illinois Department of Natural Resources (IDNR), pursuant to the Act; and

WHEREAS, the SHPO currently resides within IDNR (Office), and the Director of IDNR is the duly designated State Historic Preservation Officer (Officer); and

WHEREAS, the FHWA, in consultation with the State Historic Preservation Officer (Officer), have determined that the 251st Street Bridge over Blue Creek west of Detroit (Structure #075-0056) is eligible for the National Register of Historic Places (NRHP), and its replacement will cause an adverse effect to this historic property pursuant to 36 CFR Part 800 (Exhibit B); and

WHEREAS, the FHWA has determined that the undertaking will not have an effect on historic properties other than the 251st Street Bridge over Blue Creek, and the Officer concurred with this finding on December 4, 2024; and

WHEREAS, this Memorandum of Agreement (MOA) addresses the adverse effect to the 251st Street Bridge over Blue Creek (Structure #075-0056); and

WHEREAS, the FHWA and IDOT invited the following Tribes to enter consultation on June 26, 2025: Match-E-Be-Nash-She-Wish Band of Pottawatomi Indians, Ho-Chunk, Iowa Tribe of

Kansas and Nebraska, Kaw Nation, Miami Tribe of Oklahoma, Osage Nation, Peoria Tribe of Indians of Oklahoma, Prairie Band Potawatomi Nation, Sac and Fox Nation of Oklahoma, and Winnebago Tribe of Nebraska. Responses were received from Iowa Tribe of Kansas and Nebraska, who requested to be included as a consulting party; and Osage Nation, who commented that the project “most likely will not adversely affect any sacred properties and/or properties of cultural significance.”; and

WHEREAS, the FHWA and IDOT provided the public with opportunities to comment on the undertaking and to become consulting parties. Consulting party letters were sent out December 30, 2024 to Pike County Historic Museum/Historical Society, Landmarks Illinois, Central Illinois Landmarks Foundation, Historic Bridge Foundation, and HistoricBridges.org. Responses were received from Landmarks Illinois and Pike County Museum/Historical Society, each requesting to be included as a consulting party. Landmarks Illinois additionally expressed an interest in the design of the replacement structure; and

WHEREAS, the IDOT, on behalf of FHWA, in accordance with 36 C.F.R. Part 800.6(a)(1), notified the ACHP of the adverse effect in an email dated June 9, 2025, and no response was received; and

WHEREAS, the FHWA has consulted with IDOT 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, FHWA, Officer, IDOT, and PCHD agree that the Project shall be implemented in accordance with the following stipulations to ensure that potential effects on historic properties are considered.

STIPULATIONS

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

I. ARCHITECTURAL AND HISTORICAL RESOURCE INVESTIGATIONS

- A. Prior to beginning construction activities, the IDOT shall complete Historic Illinois Engineering Record (HIER) Level III recordation of the existing Bridge. The IDOT will submit the draft HIER (95%) to the Officer, and the IDOT must receive written concurrence from the SHPO that the draft HIER documentation is acceptable prior to the IDOT initiating demolition of the Bridge. The IDOT will ensure the final HIER (100%) documentation is submitted to the Officer for proper filing.

II. PROFESSIONAL STANDARDS

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

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 IDOT shall notify the parties to this MOA and, if it chooses to continue with the Project, then the FHWA shall reinitiate 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 are found, 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 action 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 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 considers 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 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, Officer, IDOT, and PCHD 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,
ILLINOIS DEPARTMENT OF TRANSPORTATION,
AND
PIKE COUNTY HIGHWAY DEPARTMENT
REGARDING THE
REPLACEMENT OF THE 251st STREET BRIDGE
OVER BLUE CREEK
NEAR DETROIT, PIKE COUNTY, ILLINOIS**

Signatory

FEDERAL HIGHWAY ADMINISTRATION

By: DARIEN GREGORY SIDDALL Digitally signed by DARIEN GREGORY SIDDALL
Date: 2026.04.21 06:28:06 -05'00' Date: 4/21/2026

Print Name: Darien G. Siddall

**Title: FHWA
IL Division Environmental Unit**

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REGARDING THE
REPLACEMENT OF THE 251st STREET BRIDGE
OVER BLUE CREEK
NEAR DETROIT, PIKE COUNTY, ILLINOIS**

Signatory

ILLINOIS STATE HISTORIC PRESERVATION OFFICER

By: Carey L. Mayer Date: 4/20/2026

Print Name: Carey L. Mayer, AIA

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

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NEAR DETROIT, PIKE COUNTY, ILLINOIS**

Invited Signatory

Illinois Department of Transportation

By:  Date: 4-15-26

**Print Name: Teresa C. Price
Title: Region 4 Engineer**

**MEMORANDUM OF AGREEMENT
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REGARDING THE
REPLACEMENT OF THE 251st STREET BRIDGE
OVER BLUE CREEK
NEAR DETROIT, PIKE COUNTY, ILLINOIS**

Invited Signatory

Pike County Highway Department

By:  Date: 4-16-26

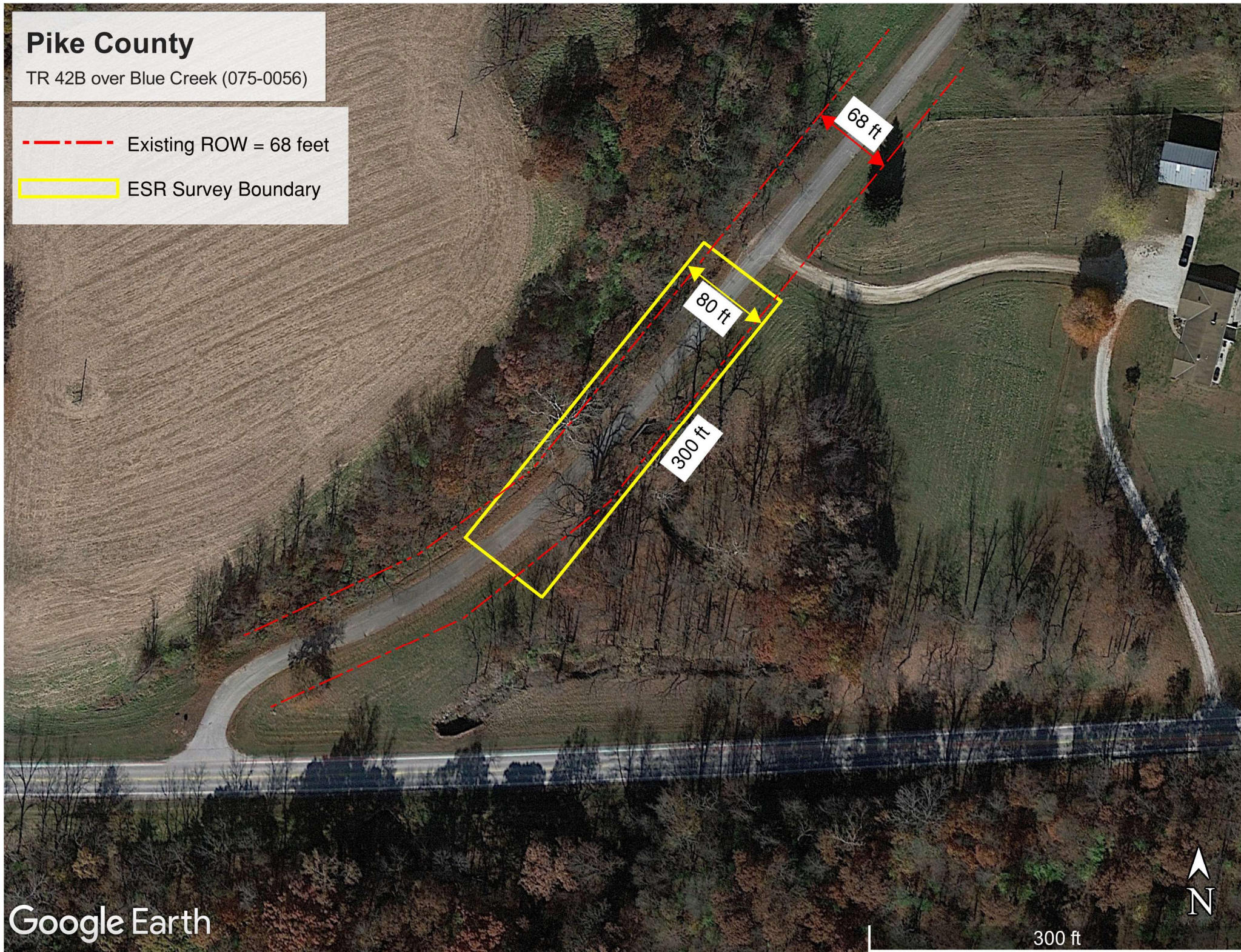
**Print Name: Christopher R. Johnson
Title: Pike County Engineer**

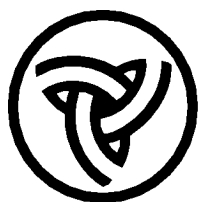
Pike County

TR 42B over Blue Creek (075-0056)

--- Existing ROW = 68 feet

ESR Survey Boundary





Illinois Department of Transportation

2300 South Dirksen Parkway / Springfield, Illinois / 62764

August 9, 2024

**Pike County
West of Detroit
251st Street
Bridge over Blue Creek
Structure #075-0056
Section #22-16120-00-BR
IDOT Sequence #25678**

FEDERAL SECTION 106 PROJECT –Identification of Architectural Resources

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 above-referenced undertaking by the Illinois Department of Transportation (IDOT) and the Federal Highway Administration) has completed the identification of architectural and historical resources within the Area of Potential Effects (APE).

This project involves the removal and replacement of Structure # 075-0056 carrying 251st Street over Blue Creek west of Detroit. A total of 0.1 acres of right-of-way and/or easements is needed for this project. Due to the scope of project, the APE for this undertaking is defined as all properties in and adjacent to the proposed ESR limits.

The identification of historic architectural properties was completed by IDOT's Cultural Resources Unit. During our review of resources over 40 years in age in the APE, one resource was identified as warranting consideration for listing on the National Register of Historic Places (NRHP): the structure proposed for replacement, Structure #075-0056. It is a concrete slab that was constructed in 1923. There are ten extant bridges of this type on IDOT's Historic Bridge List (HBL). The subject bridge is not included on the current HBL. It is IDOT's opinion that the structure is eligible for listing on the NRHP (see attached eligibility memo).

It was determined that the remaining resources in the APE do not warrant NRHP consideration as they lack the historic or architectural significance, associations, age and/or integrity needed for NRHP-eligibility.

In coordination with FHWA, IDOT requests the concurrence of the State Historic Preservation Officer (SHPO) in our opinion that the subject bridge meets the eligibility criteria for listing in the NRHP and therefore, is accorded protection under Section 106 of the National Historic

Preservation Act of 1966, as amended (36 CFR 800). The effects of the project on said resource will be conducted with your office at a later date.

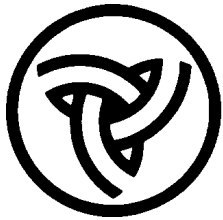
In accordance with 36 CFR Part 800.3(c)(4), if the SHPO does not object in writing in 30 days to our determinations, FHWA and IDOT will proceed to the next step in the Section 106 process.

Sincerely,

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

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

JG:eh



Illinois Department of Transportation

Memorandum

To: Joseph Galloy, IDOT Cultural Resources
From: Emilie Land, IDOT Architectural Historian
Subject: NRHP Eligibility — 251st Street Bridge over Blue Creek
(SN 075-0056), West of Detroit, Pike County, IDOT Sequence # 25678
Date: August 7, 2024

The 251st Street Bridge over Blue Creek (Structure #075-0056) west of Detroit is classified as a type 101, or a concrete slab bridge built in 1923. The structure has a single 22-foot span across the creek and sits on concrete abutments. The side rail is concrete with rectangular openings. Please see photographs for more detail on its design and construction.

The Village of Detroit is a small rural community located in Pike County in west central Illinois. Founded in 1837, it has always been a small community. The earliest image showing 251st Street is a 1917 map showing marked through routes in Illinois that is labeled as Big Four route and connected Pittsfield and Detroit. In a 1921 topographic map from historicaerials.com, the road is labeled State Highway 36. As a result of the 1921 Federal Highway Act, it is likely that the road was improved at this time including the construction for the bridge. By the mid-1950s, IL 106 was constructed which provided a more direct route from Pittsfield to Detroit. Per the 2020 census, its population is under 100. Currently, the bridge sees an average daily traffic count of 25 vehicles.

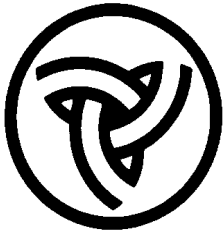
The cast-in-place flat-slab bridge is the simplest type of reinforced concrete bridges. According to the A Context for Common Historic Bridge Types (National Cooperative Highway Research Program), many states adopted the simple plan of these bridges in the first quarter of the century, and this became the preferred option for modest spans. Claude A.P. (C.A.P.) Turner devised a reinforcement system of that eliminated the need for expansion joints. These joints were deterioration because of water and salt settling in these points. These bridges were economical and easy to build.

Illinois has over 1,100 concrete slab bridges still standing today, with the earliest one still standing built in 1890 and they are still constructed today. This bridge type is becoming a quickly diminishing resource with 123 in District 6, and only 3 remaining in Pike County, which makes this design eligible within the local context. It is a good representation of the design and appears to have most of its original members. IDOT did not find any bridges of this type with a similar rail design. The fact that this bridge is still open to traffic and used in its original location for its original purpose also makes it more significant. Furthermore, it is a rare example of a concrete rail with rectangular openings.

It is our opinion that Structure #075-0056 is eligible for the NRHP under Criterion C as it represents an early or distinctive phase in bridge construction, design, or engineering and it retains the historic integrity necessary to convey its significance.

If there are any questions concerning this memorandum, please contact me by email at Emilie.Land@illinois.gov or by phone at 217-785-0426.

EL:eh



Illinois Department of Transportation

Memorandum

To:	Greg Lupton	Attn:	Mark Reitz
From:	Jack Elston	By:	Joe Galloy
Subject:	Historic Bridge Coordination		
Date:	January 10, 2025		

Pike County
Detroit
251st Street Bridge over Blue Creek
Structure #075-0056
Section #22-16120-00-BR
IDOT Seq. #25678
SHPO Log #005080924

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, the proposed removal/replacement of the 251st Street Bridge over Blue Creek (SN 075-0056) will cause an Adverse Effect to the bridge, which has been determined eligible for listing on the National Register of Historic Places (NRHP) by IDOT and SHPO. The Illinois State Historic Preservation Officer (SHPO) concurs with this Adverse Effect determination (see attached).

The structure represents an early phase in bridge construction. As such, it is afforded protection under Section 106 of the National Historic Preservation Act of 1966, as amended (36 CFR 800), and Section 4(f) of the U.S. Department of Transportation Act of 1966, as amended (49 USC 303) also applies.

Based on the submitted information, the current plans are to replace the bridge; however, its replacement would constitute an adverse effect. All reasonable measures must be taken to avoid the demolition of this bridge and other alternatives evaluated, such as rehabilitation, new structures on a new alignment or complete avoidance. If there is no feasible or prudent alternative to demolition, a Section 4(f) report will be required to continue coordination.

Please submit information regarding the chosen course of action (i.e. plans of the repairs/rehabilitation, new alignment, or the Section 4(f) report) to our office in order to continue the cultural review for the project.

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

JG:eh



Illinois
Department of
**Natural
Resources**

JB Pritzker, Governor • Natalie Phelps Finnie, Director
One Natural Resources Way • Springfield, Illinois 62702-1271

www.dnr.illinois.gov

**Pike County
Detroit**

**Bridge Replacement (SN 075-0056)
Carrying 251st St. over Blue Creek
IDOT Sec #-22-16120-00-BR, IDOT Seq #-25678
SHPO Log #005080924**

December 4, 2024

**Dr. Joseph Galloy
Illinois Department of Transportation
Bureau of Design and Environment
2300 S. Dirksen Parkway
Springfield, IL 62764**

We have reviewed the information provided regarding the above referenced project. Our review is required by Section 106 of the National Historic Preservation Act of 1966, as amended, and its implementing regulations, 36 CFR 800: "Protection of Historic Properties."

The 1923 built concrete slab bridge with rectangular openings carrying 251st Street over Blue Creek in Detroit (SN 075-0056) is eligible for listing in the National Register of Historic Places under Criterion C. The bridge represents an early or distinctive phase in bridge construction, design, or engineering and it retains the historic integrity necessary to convey its local level of significance.

The proposal to demolish this bridge constitutes an adverse effect as defined in 36 CFR 800.5.

At this time, you should work with this office to develop a plan to mitigate this adverse effect. Please note that the bridge must not be demolished prior to the resolution of the disposition of this historic property.

Please contact CJ Wallace, Cultural Resources Coordinator, at (217) 785-5027 or at Carol.Wallace@illinois.gov with any questions.

Sincerely,

**Carey L. Mayer, AIA
Deputy State Historic Preservation Officer**