

**MEMORANDUM OF AGREEMENT  
AMONG THE  
FEDERAL HIGHWAY ADMINISTRATION,  
ILLINOIS STATE HISTORIC PRESERVATION OFFICER,  
ILLINOIS DEPARTMENT OF TRANSPORTATION,  
AND  
MCDONOUGH COUNTY HIGHWAY DEPARTMENT  
REGARDING THE  
REPLACEMENT OF THE COUNTY HIGHWAY 8 / BERLIN ROAD  
BRIDGE OVER CAMP CREEK NEAR  
INDUSTRY, MCDONOUGH COUNTY, ILLINOIS**

**WHEREAS**, the Illinois Department of Transportation (IDOT), in conjunction with the McDonough County Highway Department (MCHD), plans to replace the County Highway 8 / Berlin Road Bridge over Camp Creek (Structure #055-3001) near Industry, McDonough County, Illinois (IDOT Sequence #24855, SHPO Log #001092322); 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 C.F.R. Part 800; and

**WHEREAS**, the FHWA has defined the undertaking's architectural area of potential effects (APE) as all properties in and adjacent to the proposed project limits around the historic bridge as shown in Exhibit A; and

**WHEREAS**, the FHWA and IDOT, in consultation with the SHPO, have determined that the County Highway 8 / Berlin Road Bridge over Camp Creek (Structure #055-3001) 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 C.F.R. Part 800 (Exhibit B); and

**WHEREAS**, the FHWA has determined that the undertaking will not have an effect on historic properties other than the County Highway 8 / Berlin Road Bridge over Camp Creek (Structure #055-3001), and the SHPO concurred with this finding on March 27, 2024; and

**WHEREAS**, the FHWA and IDOT provided the public opportunities to comment on the undertaking and to become consulting parties. Engagement efforts included: (1) a February 16, 2024 newspaper notice in Macomb's Community News Brief Weekly, and (2) December 2024 letters sent to Landmarks Illinois, Central Illinois Landmarks Foundation, Colchester Area Historical Society, McDonough County Historical Society, Western Illinois Museum, Historic Bridge Foundation, and HistoricBridges.org. Landmarks Illinois provided the only response and inquired about potential mitigation measures; 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 March 20, 2025, and the ACHP declined to participate in consultation on April 3, 2025; and

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

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

### **STIPULATIONS**

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

#### **I. ARCHITECTURAL AND HISTORICAL RESOURCE INVESTIGATIONS**

- A. Historic Illinois Engineering Record (HIER) Level III Recordation.** Prior to beginning of 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 SHPO, 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 SHPO for proper filing.
- B. Interpretive Panel(s).** The MCHD will install interpretive signage or panel(s) in a public county building, such as the County Courthouse. The signage/panels may include the following: historical information about the history of the bridge; architectural/engineering significance of the bridge; and other historic bridges in McDonough County. This list of topics is not meant to be comprehensive but is provided to guide the design of the signage/panel(s). Design of the signage/plaques will be completed by IDOT with input solicited from the MCHD on content, material selection, size, signage location, and other pertinent details. The location and content of the signage/panel(s) will be reviewed and approved by the SHPO prior to production and installation. Any changes, proposed by the IDOT or SHPO in either location or content must be received within forty-five (45) days of receipt. After that, it will be presumed the location and content of the signage/panel(s) is sufficient. Photographs of the final signage/panel(s) location must be submitted to IDOT and SHPO upon installation.

## **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 C.F.R. Part 61. The IDOT shall ensure that the professional staff responsible for the implementation of the mitigation measures meet the requirements of 36 C.F.R. 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 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 C.F.R. 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 C.F.R. 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 C.F.R. 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 per stipulation VI above. 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 C.F.R. Part 800.7. FHWA shall notify the signatories as to the course of action it will pursue.

Execution of this MOA by the FHWA, IDOT, MCHD and SHPO 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  
MCDONOUGH COUNTY HIGHWAY DEPARTMENT  
REGARDING THE  
REPLACEMENT OF THE COUNTY HIGHWAY 8 / BERLIN ROAD  
BRIDGE OVER CAMP CREEK NEAR  
INDUSTRY, MCDONOUGH COUNTY, ILLINOIS**

Signatory

FEDERAL HIGHWAY ADMINISTRATION

By: *Darien J. Siddall* Date: 5/22/2025

**Print Name:** Darien Siddall

**Title:** Environmental Protection Specialist

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INDUSTRY, MCDONOUGH COUNTY, ILLINOIS**

Signatory

ILLINOIS STATE HISTORIC PRESERVATION OFFICER

By: Carey L. Mayer Date: 5/16/2025

**Print Name: Carey L. Mayer, AIA**

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

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BRIDGE OVER CAMP CREEK NEAR  
INDUSTRY, MCDONOUGH COUNTY, ILLINOIS**

Invited Signatory

McDonough County Highway Department

By:  Date: 5.12.2025

Print Name: SCOTT D. HANCE

Title: ACTING COUNTY ENGINEER

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INDUSTRY, MCDONOUGH COUNTY, ILLINOIS**

Invited Signatory

ILLINOIS DEPARTMENT OF TRANSPORTATION

By: Kensil A. Garnett Date: 051225

Print Name: Kensil Garnett

Title: Region 3 Engineer

Exhibit A

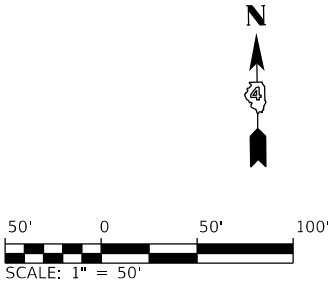
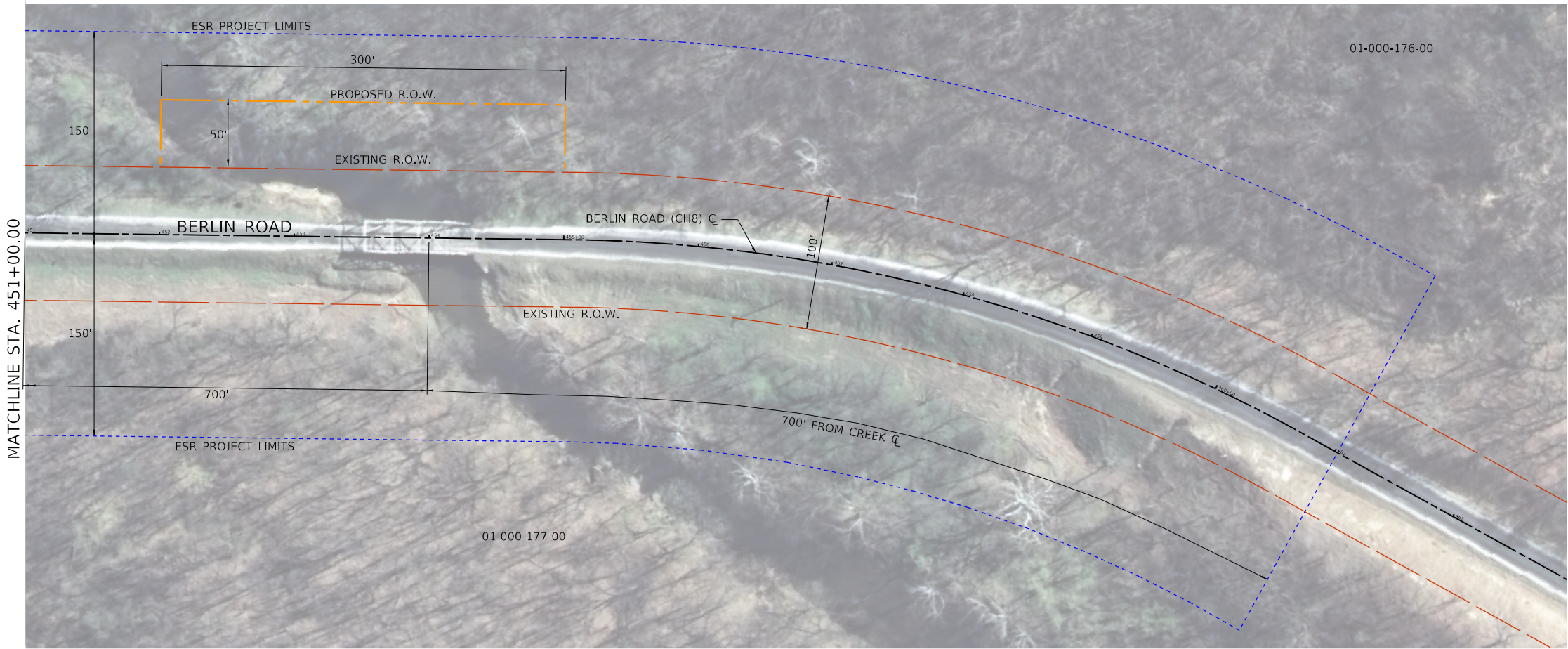
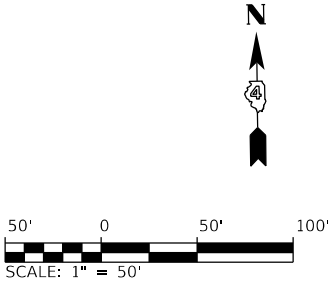
- NOTES:
- 1. PROPOSED R.O.W. SHOWN ON THIS EXHIBIT ARE PRELIMINARY AND FOR ILLUSTRATIVE PURPOSES ONLY.
  - 2. TEMPORARY AND/OR PERMANENT EASEMENTS SHALL BE UTILIZED AS NEEDED TO CONSTRUCT THE PROPOSED IMPROVEMENTS. ALL EASEMENTS SHALL REMAIN WITHIN THE PROJECT LIMITS AS SHOWN.

LEGEND

ESR PROJECT LIMITS

EXISTING R.O.W.

PROPOSED R.O.W.



DIRECTORY = Emily Munday  
USER NAME =



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MODEL NAME =	DESIGNED - EMM	REVISED -
FILE NAME =	DRAWN - IHS	REVISED -
PLOT SCALE = 100.0000' / 1in.	CHECKED - EMM	REVISED -
PLOT DATE = 6/14/2022 (2:17:17 PM)	DATE - JUNE 2022	REVISED -

STATE OF ILLINOIS  
DEPARTMENT OF TRANSPORTATION

BERLIN ROAD BRIDGE REPLACEMENT FIGURE 2: ESR PROJECT LIMITS			
SCALE:	SHEET 1	OF 1 SHEETS	STA. TO STA.

F.A.U. RTE.	SECTION	COUNTY	TOTAL SHEETS	SHEET NO.
-	21-00112-00-BR	MCDONOUGH	1	
CONTRACT NO. 89744				
ILLINOIS FED. AID PROJECT				



# Illinois Department of Transportation

## Memorandum

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To:	Greg Lupton	Attn:	Mark Reitz
From:	Jack Elston	By:	Joseph Galloy
Subject:	Adverse Effect – SHPO Coordination Required		
Date:	November 27, 2024		

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**McDonough County**  
**Industry**  
**CH 8 / Berlin Rd.**  
**Bridge Replacement**  
**Structure # 055-3001**  
**Section # 21-00112-00-BR**  
**IDOT Sequence #24855**  
**SHPO Log # 001092322**

Further coordination with the Illinois State Historic Preservation Officer (SHPO) is required for the above referenced undertaking. Attached is a letter from the SHPO indicating that this project as currently planned will constitute an Adverse Effect pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, as it will adversely affect Structure #055-3001, which is eligible for listing on the National Register of Historic Places (NRHP).

As a next step, efforts should be made to reduce the project's impacts to the historic resource. Federal policy requires that all reasonable measures be taken to avoid the demolition of the historic bridge. Rehabilitation of the existing structure must be considered. If rehabilitation is not feasible, an attempt must be made to avoid the structure by construction of the replacement bridge on a new alignment. If there is no feasible or prudent alternative to demolition, a Section 4(f) report will be required in order to continue the cultural review.

A handwritten signature in black ink, reading "Joseph M. Galloy".

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

JG:el  
Attachment



Illinois  
Department of  
**Natural  
Resources**

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

[www.dnr.illinois.gov](http://www.dnr.illinois.gov)

**McDonough County**

**Industry**

**Bridge Replacement (SN 055-3001)**

**County Highway 8/Berlin Road over Camp Creek**

**IDOT-21-00122-00-BR, IDOT Seq #-24855**

**SHPO Log #001092322**

**November 6, 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 for 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 bridge along County Highway 8/Berlin Road over Camp Creek (SN 055-3001) that was built in 1937 has been determined eligible for listing in the National Register of Historic Places under Criterion C as a good example of a Steel Pratt Through Truss (Riveted) Bridge at the local level of significance.**

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

**You should continue to 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](mailto:Carol.Wallace@illinois.gov) with any questions.**

**Sincerely,**

**Carey L. Mayer, AIA**

**Deputy State Historic Preservation Officer**