

**MEMORANDUM OF AGREEMENT
AMONG THE
FEDERAL HIGHWAY ADMINISTRATION,
ILLINOIS STATE HISTORIC PRESERVATION OFFICER,
ILLINOIS DEPARTMENT OF TRANSPORTATION,
AND
VILLAGE OF LAKE BLUFF
REGARDING THE
SUPERSTRUCTURE REPLACEMENT OF THE GREEN BAY ROAD
BRIDGE OVER THE UNION PACIFIC RAILROAD IN
LAKE BLUFF, LAKE COUNTY, ILLINOIS**

WHEREAS, the Illinois Department of Transportation (IDOT), in conjunction with the Village of Lake Bluff (Village), plans to replace the superstructure of the Green Bay Road Bridge over the Union Pacific Railroad (UPRR) (Structure #049-6802) in Lake Bluff, Lake County, Illinois (IDOT Sequence #23672, SHPO Log #002030824); 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 IDOT has consulted with the Illinois State Historic Preservation Office (SHPO), 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 has defined the undertaking's architectural area of potential effects (APE) as a roughly 200-foot buffer surrounding the historic bridge as shown in Exhibit A; and

WHEREAS, the FHWA and IDOT, in consultation with the Officer, have found the SHPO determined that the Green Bay Road Bridge over UPRR (Structure #049-6802) was eligible for the National Register of Historic Places (NRHP) on November 29, 1987, a finding which was reaffirmed on July 1, 2019, and its superstructure 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 Green Bay Road Bridge, and the Officer 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. Public engagement letters were sent out on May

17, 2024 to five parties: Landmarks Illinois, History Center Lake Forest-Lake Bluff, Lake Bluff Historic Preservation Commission, Historic Bridge Foundation, and HistoricBridges.org. No responses were received; 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 April 1, 2025, and the ACHP declined to participate in consultation on April 10, 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, Village and the Officer 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, Village, and the Officer agree that the following steps will be undertaken for the Project:

I. ARCHITECTURAL AND HISTORICAL RESOURCE INVESTIGATIONS

- A. Roadside Exhibit Featuring Bridge Truss and/or Outrigger(s).** The Village, in coordination with the IDOT and the Officer, will develop a roadside exhibit featuring historic members of the existing structure and interpretative panel(s) detailing the historic bridge and transportation history of Lake Bluff. The exhibit will be installed at a location agreed upon by all signatories of this MOA. The draft design and content of the exhibit will be submitted to the IDOT for review. IDOT will submit the draft to the Officer for approval. The IDOT will ensure the final content and plan for the panel is submitted to the Officer for review and final approval.
- B. Salvage of Historic Members.** When the existing bridge is being dismantled during the construction of the new structure, the Village will salvage the historic trusses and outriggers not planned for use for the roadside exhibit to the extent practicable and store the members for potential future use. The Village commits to safely storing the members on Village property for a minimum of ten (10) years.

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 reinitiate 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. 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, Village and the Officer 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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ILLINOIS DEPARTMENT OF TRANSPORTATION,
AND
VILLAGE OF LAKE BLUFF
REGARDING THE
SUPERSTRUCTURE REPLACEMENT OF THE GREEN BAY ROAD
BRIDGE OVER THE UNION PACIFIC RAILROAD IN
LAKE BLUFF, LAKE COUNTY, ILLINOIS**

Signatory

FEDERAL HIGHWAY ADMINISTRATION

By: *Darien J. Siddall* Date: 6/26/2025

Print Name: Darien Siddall

Title: Environmental Protection Specialist

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Signatory

ILLINOIS STATE HISTORIC PRESERVATION OFFICER

By: Carey L. Mayer Date: 6/13/2025

Print Name: Carey L. Mayer, AIA

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

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Invited Signatory

Village of Lake Bluff

By: 

Date: 06-10-2025

Print Name: R. Drew Irvin

Title: Lake Bluff Village Administrator

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Invited Signatory

ILLINOIS DEPARTMENT OF TRANSPORTATION

By:  Date: 6/25/25

Print Name: Jose Rios

Title: Region One Engineer
ILLINOIS Department of
Transportation

Exhibit A



ESR Limits/APE Resources Number

APE Map

Bridge Rehabilitation and Replacement
FAU 2711/Green Bay Road over Union Pacific Railroad
Lake Bluff, Lake County, Illinois
IDOT Sequence #23672

0 175 350
Feet



LOCHMUELLER GROUP
319 E Madison Street, Suite #2E
Springfield, Illinois
PHONE: 800.423.7411

Created: 3/7/2024, HBLAD

Exhibit B



Illinois
Department of
**Natural
Resources**

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

www.dnr.illinois.gov

Lake County
Lake Bluff

Bridge Rehabilitation and Replacement (SN 049-6802)
FAU 2711/Green Bay Road over Union Pacific Railroad
IDOT-P-91-005-20, IDOT Sec #-18-00039-01-BR, IDOT Seq #-23672
SHPO Log #002030824

March 27, 2024

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

Thank you for your submission of the proposed bridge replacement project in Lake Bluff, Illinois, which we received on 3/8/24 with additional information received on 3/13/24 (SHPO Log# 002030824). Our comments are required by Section 106 of the [National Historic Preservation Act of 1966](#), as amended, 54 U.S.C. § 306108, and its [implementing regulations](#) (36 CFR Part 800) (Act).

We concur with the established Area of Potential Effects (APE) and the identification of historic properties within the APE:

- Green Bay Road Bridge over Union Pacific Railroad (SN 049-6802), Lake Bluff. Determined eligible for listing on the National Register of Historic Places (NRHP) on November 29, 1987. The determination was reaffirmed on July 19, 2019 (SHPO Log #007062119).
- 1650 Green Bay Road, Lake Bluff. Eligible for listing on the NRHP, under Criterion C, for Architecture, with a local level of significance and period of significance of 1927, the original date of construction.

Furthermore, we concur with the determination that the proposed project will adversely affect the historic bridge (SN 049-6802). Since the truss remnants will not be restored or returned to the bridge as a part of the current proposed rehabilitation, the adverse effects cannot be avoided. Please work with CJ Wallace (Carol.Wallace@Illinois.gov) in our office to mitigate the adverse effects pursuant to the Act.

Sincerely,

Carey L. Mayer, AIA
Deputy State Historic Preservation Officer