

**MEMORANDUM OF AGREEMENT  
AMONG THE  
FEDERAL HIGHWAY ADMINISTRATION,  
ILLINOIS STATE HISTORIC PRESERVATION OFFICER,  
AND  
ILLINOIS DEPARTMENT OF TRANSPORTATION  
REGARDING THE REPLACEMENT OF  
THREE PEDESTRIAN BRIDGES ALONG THE SOUTH SIDE OF US 24  
IN THE CITY OF RUSHVILLE, IN SCHUYLER COUNTY, ILLINOIS**

**WHEREAS**, the Illinois Department of Transportation (IDOT) plans roadway improvements to US 24, including the replacement of three pedestrian bridges (West Pedestrian Bridge, Middle Pedestrian Bridge, and East Pedestrian Bridge), in Rushville in Schuyler County, Illinois (IDOT Sequence #25792, SHPO Log #004041924) (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 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 (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 and the IDOT, in consultation with the Officer, have determined that the West Pedestrian Bridge, Middle Pedestrian Bridge, and East Pedestrian Bridge along the south side of US 24, built circa 1929 are eligible for the National Register of Historic Places (NRHP), and their replacement will cause an adverse effect to these historic properties 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 three pedestrian bridges, and the Officer concurred with this finding on October 18, 2024; and

**WHEREAS**, this Memorandum of Agreement (MOA) addresses the adverse effect to the West Pedestrian Bridge, Middle Pedestrian Bridge, and East Pedestrian Bridge along the south side of US 24 with this undertaking; and

**WHEREAS**, the FHWA and IDOT notified Landmarks Illinois, Historic Bridge Foundation, Schuyler County Architecture Foundation, HistoricBridges.org, Schuyler County Historic Jail Museum & Genealogical Center, Central Illinois Landmarks Foundation, and the City of Rushville regarding the effects of the undertaking on historic properties and invited them to consult. Responses were received from the Schuler County Architecture Foundation, Schuyler County Historic Jail Museum & Genealogical Center and Landmarks Illinois wishing to be consulting parties; and

**WHEREAS**, the IDOT, on behalf of FHWA, in accordance with 36 CFR Part 800.6(a)(1), notified the ACHP of the adverse effect in an email dated September 10, 2025, and the ACHP failed to respond pursuant to 36 CFR Part 800. 6(a)(1)(iii); 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**, the FHWA, the IDOT, 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, the IDOT, and the Officer agree that the following steps will be undertaken for the Project:

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

- A. The IDOT shall create and install a commemorative plaque near the location of one of the historic bridges that will include a line drawing of one of the original bridges, a historical narrative describing the bridges' ca. 1929 construction and significance, and recognition of their architectural and transportation heritage value.
- B. Prior to demolition of the bridges, the IDOT shall complete Historic Illinois Engineering Record (HIER) Level III recordation of the bridges. The IDOT will submit the draft HIER (95%) to the Officer, and the IDOT must receive written concurrence from the Officer that the draft HIER documentation is acceptable prior to the IDOT initiating demolition of the bridges. The IDOT will submit the final HIER (100%) documentation to the Officer.

## **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.

## **III. DURATION**

This MOA will expire if its stipulations are not carried out within five (5) years from the date of its execution. 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 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 the FHWA determines that such objection cannot be resolved, the 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 the 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, the 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. The 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 the FHWA may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, the 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. The 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, the FHWA must request, take into account, and respond to the comments of the ACHP under 36 CFR Part 800.7. The FHWA shall notify the signatories as to the course of action it will pursue.

Execution of this MOA by the FHWA, the IDOT, and the Officer and implementation of its terms evidence that the 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 STATE HISTORIC PRESERVATION OFFICER,  
AND  
ILLINOIS DEPARTMENT OF TRANSPORTATION  
REGARDING THE REPLACEMENT OF  
THREE PEDESTRIAN BRIDGES ALONG THE SOUTH SIDE OF US 24  
IN THE CITY OF RUSHVILLE, IN SCHUYLER COUNTY, ILLINOIS**

Signatory

FEDERAL HIGHWAY ADMINISTRATION

By: *Darien J. Siddall* Date: 12/9/2025

**Print Name:**

**Title: FHWA, IL Division Environmental Unit**

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Signatory

ILLINOIS STATE HISTORIC PRESERVATION OFFICER

By: Carey L. Mayer Date: 12/5/2025

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

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

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Invited Signatory

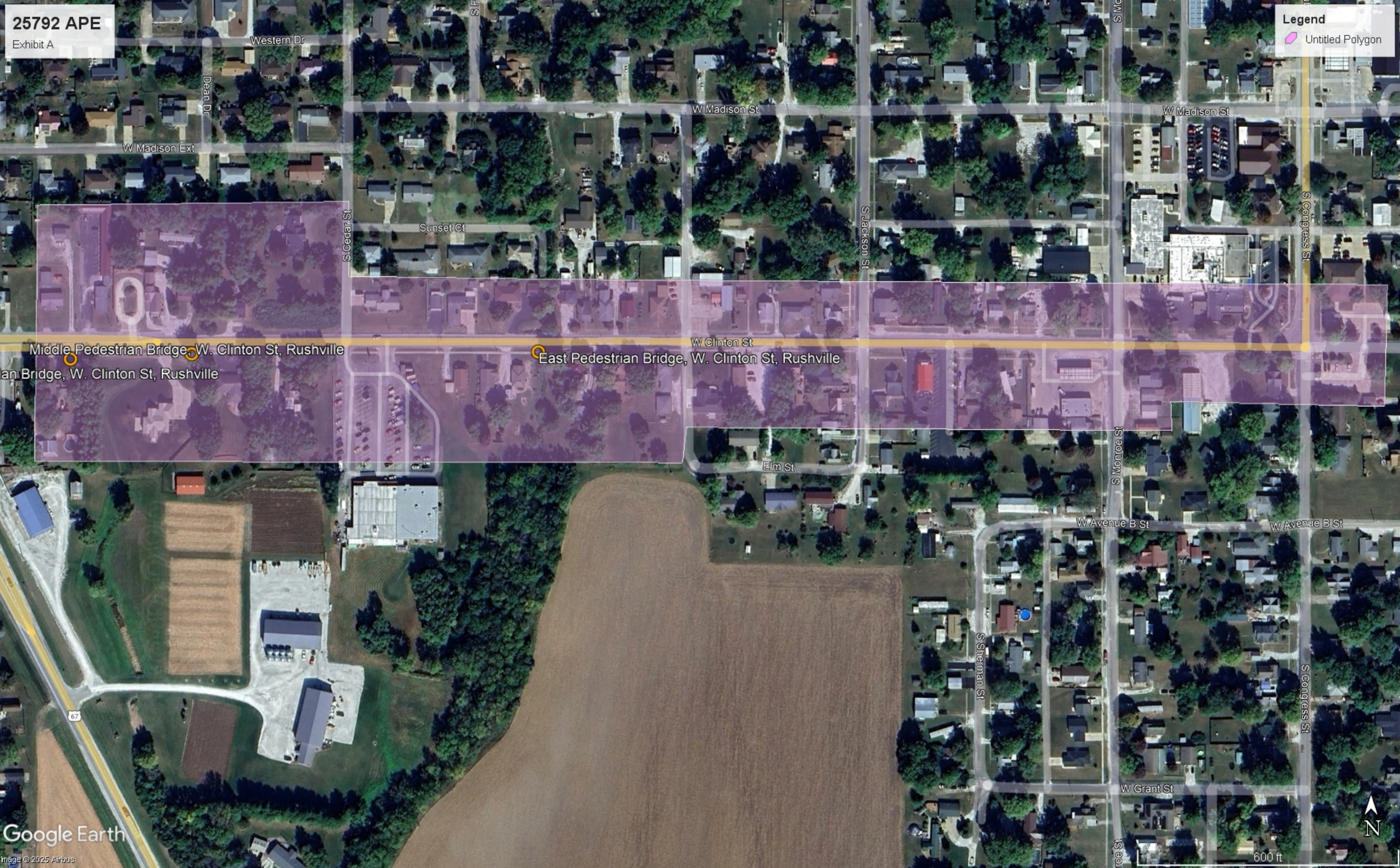
ILLINOIS DEPARTMENT OF TRANSPORTATION

By:  Date: 12/01/25

**Print Name: Teresa C. Price, P.E.**

**Title: Region 4 Engineer**





25792 APE

Exhibit A

Legend

Untitled Polygon

Middle Pedestrian Bridge, W. Clinton St, Rushville

East Pedestrian Bridge, W. Clinton St, Rushville

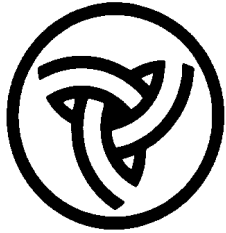
Google Earth

Image © 2025 Airbus



600 ft





# Illinois Department of Transportation

## Memorandum

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To:	Jeffrey Myers	Attn:	Dennis O'Connell
From:	Jack Elston	By:	Joseph Galloy
Subject:	Historic Bridge Coordination		
Date:	December 16, 2024		

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**Schuyler County**  
**Rushville**  
**FAP 317/US 24/Clinton Street**  
**Roadway Improvements**  
**Section # D- 96-011-23**  
**IDOT Seq. # 25792**

Pursuant to Section 106 of the National Historic Preservation Act of 1966, as amended, the planned replacement of the three pedestrian bridges (West Pedestrian Bridge, the Middle Pedestrian Bridge, and the East Pedestrian Bridge), located along US 24 (Clinton Street), which is part of a larger roadway improvement project, will cause an Adverse Effect to the bridges, which were determined eligible for listing on the National Register of Historic Places (NRHP) on May 3, 2024. The Illinois State Historic Preservation Officer (SHPO) concurs with this Adverse Effect determination (see attached concurrence letter).

The concrete bridges were built in the 1920s or 1930s and are very rare and excellent examples of concrete arch deck open spandrel bridges. As such, they are therefore 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 these bridges; however, their replacement would constitute an adverse effect. All reasonable measures must be taken to avoid the demolition of these bridges 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 in order to continue coordination with the SHPO.

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 initiate SHPO consultation for the project.

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" being more prominent than the middle initial "M".

Joseph M. Galloy  
Cultural Resources Unit  
Bureau of Design and Environment

JG:hah





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)

Schuyler County  
Rushville

Roadway Improvements

FAP 317/U.S. 24 (Clinton St.) between West of Cedar St. and Congress St.

Middle Pedestrian Bridge - Sidewalk on South side of U.S. 24 (Clinton St.) over a Drainage Ditch,

East Pedestrian Bridge - Sidewalk on South side of U.S. 24 (Clinton St.) over a Drainage Ditch, and West

Pedestrian Bridge - Sidewalk on South side of U.S. 24 (Clinton St.) over a Drainage Ditch

IDOT-D-96-011-23, IDOT Seq #-25792

SHPO Log #004041924

October 16, 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 West Pedestrian Bridge, the Middle Pedestrian Bridge and the East Pedestrian Bridge, that were built between the 1920's and 1930's, which our office previously concurred were eligible for listing in the National Register of Historic Places under Criterion C. The structures are examples of unusually small concrete arch open spandrel bridges, a type that is becoming a rare example of this design applied as a pedestrian bridge in the State of Illinois.

The proposal to demolish these bridges 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 bridges must not be demolished prior to the resolution of the disposition of these historic properties.

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