

IEPA Log No.: **C-0396-12**  
CoE appl. #: **LRC-2007-802**

Public Notice Beginning Date: **August 15, 2013**  
Public Notice Ending Date: **September 5, 2013**

Section 401 of the Federal Water Pollution Control Act  
Amendments of 1972

**Section 401 Water Quality Certification to Discharge into Waters of the State**

**Public Notice/Fact Sheet Issued By:**

Illinois Environmental Protection Agency  
Bureau of Water  
Permit Section  
1021 North Grand Avenue East  
Post Office Box 19276  
Springfield, Illinois 62794-9276  
217/782-3362

**Name and Address of Discharger:** Illinois State Toll Highway Authority – 2700 Ogden Avenue,  
Downers Grove

**Discharge Location:** Various locations and areas within DuPage and Cook County.

**Name of Receiving Water:** Various

**Project Description:** Proposed construction of new tollway alignments and improvements to existing corridors to form the Elgin O'Hare Western Access project.

The Illinois Environmental Protection Agency (IEPA) has received an application for a Section 401 water quality certification to discharge into the waters of the state associated with a Section 404 permit application received by the U.S. Army Corps of Engineers. The Public Notice period will begin and end on the dates indicated in the heading of this Public Notice. The last day comments will be received will be on the Public Notice period ending date unless a commenter demonstrating the need for additional time requests an extension to this comment period and the request is granted by the IEPA. Interested persons are invited to submit written comments on the project to the IEPA at the above address. Commenters shall provide their names and addresses along with comments on the certification application. Commenters may include a request for public hearing. The certification and notice number(s) must appear on each comment page.

The attached Fact Sheet provides a description of the project and the antidegradation assessment.

The application, Public Notice/Fact Sheet, comments received, and other documents are available for inspection and may be copied at the IEPA at the address shown above between 9:30 a.m. and 3:30 p.m. Monday through Friday when scheduled by the interested person.

If written comments or requests indicate a significant degree of public interest in the certification application, the IEPA may, at its discretion, hold a public hearing. Public notice will be given 30 days before any public hearing. If a Section 401 water quality certification is issued, response to relevant comments will be provided at the time of the certification. For further information, please call Darren Gove at 217/782-3362.

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The Illinois State Toll Highway Authority (“applicant”) has applied for 401 water quality certification for the proposed impact to 24.85 acres of jurisdictional wetlands and 2.97 acres of jurisdictional streams within the designated project area. The project area is comprised of the northwest boundary of Chicago, the entirety of O’Hare Airport and 26 suburban communities within DuPage and Cook counties. The proposed project will consist of 16 miles of new toll road, approximately 9 miles of improvements to existing roads (i.e. I-294 and I-90) and freeway (I-290), and 16 miles of supporting arterial improvements. The transportation project will consist of two major components. The east-west component is known as the Elgin O’Hare corridor and extends to the west from O’Hare Airport approximately 10 miles to Gary Avenue. The Elgin O’Hare corridor will consist of 3 lanes in each direction with additional auxiliary lanes. The north - south component is known as the West Bypass corridor and it will connect I-90 on the north side of O’Hare near the Elmhurst Road interchange with I-294 on the south side of O’Hare. The West Bypass will be comprised of 2 basic lanes in each direction with additional auxiliary lanes in high traffic areas. It will be approximately 6.2 miles in length.

Other major elements of the project include the following:

- System interchanges that provide direct movement from expressway to expressway would be required at four locations: Elgin O’Hare corridor and I-290, Elgin O’Hare and West Bypass (EOWA) corridors, West Bypass corridor and I-90, and West Bypass corridor and I-294.
- Local access interchanges that provide access to major arterial corridors from the mainline corridors would be provided at 16 locations including existing and new interchange.
- Arterial Improvements including added travel lanes, turning lanes, and updated traffic signals are planned at 31 locations to accommodate increased travel in close proximity to the interchanges and along some sections of arterials.
- Frontage roads are planned along the Elgin O’Hare main corridor to maintain access to developed and developable lands. On the west end of the Elgin O’Hare corridor, the existing frontage roads between Gary Avenue and Wright Boulevard would be retained. New frontage roads would be provided in areas where access is required between Meacham Road and York Road.
- Drainage facilities including stormwater detention facilities, compensatory floodplain storage, and other best management practices (BMP) would be constructed to compensate for the increased impervious surface, loss of floodplain, and enhance the water quality of roadway runoff.
- Other Transportation Components have been incorporated into the project according to the documentation, “Transit Facilities have been planned as part of the project in coordination with area transit providers, and include dedicated transit service (e.g., Bus Rapid Transit [BRT] or rail options), bus express service, and bus shuttle service. The main transit feature is the preservation of space in the median of the Elgin O’Hare corridor from the western edge of O’Hare Airport to Schaumburg. The transit dedicated service would accommodate either BRT or rail options and five stations are planned in the median along the route. The north leg of the West Bypass corridor has been located to provide sufficient space for a transit facility to be placed along the east side of the roadway to connect the proposed West Terminal at O’Hare Airport to an eventual commuter transit service along I-90. Express bus service is also planned connecting the proposed O’Hare West Terminal with the Rosemont Chicago Transit Authority (CTA) Blue Line station, the Woodfield Mall from the Elgin O’Hare corridor, and the Schaumburg and Hanover Park Metra stations. Bicycle/ Pedestrian Facilities have been planned within, adjacent, or crossing the planned roadway improvements. The layout of these facilities has been fully coordinated with the

Tollway, IDOT, community interests, and bicycle organizations. The EOWA project has reserved space for planned bicycle and pedestrian facilities collocated in the roadway corridor.”

During the planning period of the project, Illinois Governor Pat Quinn formed a project Advisory Council to develop a strategy for implementation. The works of the Advisory Council lead to a consensus opinion that a financially achievable project would be attained by revenues of tolling with the Illinois Tollway as the preferred implementing agency. In September 2011, the Illinois Tollway Board enacted a system toll increase that would finance a 15-year capital improvement program, *Move Illinois: The Illinois Tollway Driving the Future*, which includes the EOWA project.

The Advisory Council directive was to develop a financially achievable project. A phased approach was recommended to satisfy the objective of a financially achievable project. The Full-Build project, as identified in the Tier Two Final Environmental Impact Statement (EIS), is designed to accommodate long-term (year 2040 and beyond) travel demand. While the Full-Build addresses long-term travel needs in the area, it comes at a high cost. Given the substantial cost, the first of the phased approach; Initial Construction Plan (ICP) was developed with the goal of being a more financially attainable first phase of the project.

The ICP maintains the integrity of the Full-Build project and serves the area’s sizable travel needs through an interim design period of 2030. The ICP would include improvements along all sections of the project, but with fewer initial travel lanes, fewer interchanges and in some cases new interchanges that would accommodate fewer movements. The remaining added travel lanes and interchange improvements included in the Full-Build would be pursued as travel demand and future funding becomes available.

The project footprint for the Full-Build compared to the ICP differs slightly (less than 10 acres for an overall footprint measuring over 1,800 acres). The right-of-way being acquired by the Illinois Tollway will serve the needs of the ICP, as well as the Full-Build. Within the right-of-way limits, the mainline sections of the ICP will be built to the outside, and future travel lanes under the Full-Build would be added to the inside. Thus, the outside extent of the right-of-way limits would be unaffected by the Full-Build project. Best Management Practices (BMPs) are being sized to accommodate the pavement runoff for the ICP. Added pavement under the Full-Build project would require additional BMPs, including detention. The aerial extent of the right-of-way will accommodate the future drainage and BMP needs.

### **Identification and Characterization of the Affected Water Body.**

The ICP project corridor is located within the Des Plaines River drainage basin, HUC 07120004, as catalogued by the USGS. The Des Plaines River drainage basin has been divided into several smaller sub-watersheds near the project corridor, including Addison Creek, Des Plaines River, Salt Creek, West Branch DuPage River, and Willow Creek. Water resources in the project corridor include riverine and lacustrine cover types. During 2009 through 2012, the Illinois Natural History Survey (INHS) conducted field surveys and assessments of streams, lakes, and non-wetland ponds near the EOWA project corridor. As part of a different study, an aquatic resource assessment was completed for the project corridor streams that flow through O’Hare Airport. Ten streams and their tributaries, two lakes, and approximately 40 non-wetland ponds were identified by INHS in the vicinity of the project corridor. The non-wetland ponds are predominantly stormwater management facilities that INHS did not consider to be jurisdictional waters of the U.S. Final jurisdictional determination will be completed by the USACE.

None of the project corridor streams have special designations with respect to function, value, or high quality. The streams are not listed as navigable waters of the U.S. under Section 10 of the River and Harbors Act of 1899 (USACE, 2010), or as Wild and Scenic Rivers. The waters are also not included on the Nationwide Rivers Inventory for “outstandingly remarkable” natural or cultural values of more than local or regional significance. No BSS are within the project corridor. Based on information provided by the IDNR and Illinois Natural Heritage Database (March 21, 2011), none of the identified streams include mapped Illinois Natural Areas or state-listed threatened or endangered species within the project corridor.

Addison Creek is a General Use water with zero 7Q10 flow. Addison Creek Waterbody Segment IL\_GLA-04 has been identified in the proposed project area. The stream is listed in the Illinois Integrated Water Quality Report and Section 303(d) List-2012 as impaired for Aquatic Life and Aesthetic Quality. The potential causes of impairment to Aquatic Life include alpha-BHC, Alteration in Stream or Littoral Vegetation (non-pollutant) Copper, Hexachlorobenzene, Oil and Grease, Other Flow Regime Alterations (non-pollutant), dissolved Oxygen, Phosphorus (Total), Polychlorinated biphenyls, Sedimentation/Siltation (non-pollutant), Total Suspended Solids (TSS), Visible Oil. The potential causes of impairment for Aesthetic Quality are Aquatic Algae (non-pollutant), Bottom Deposits, Phosphorus (Total) and Visible Oil. This stream has a watershed of approximately 5.89 square miles at the point of impact. The stream is not listed as biologically significant nor has it received an integrity rating in the 2008 Illinois Department of Natural Resources Publication *Integrating Multiple Taxa in a Biological Stream Rating System* within the project area. The stream is not enhanced in regards to the dissolved oxygen water quality standard.

Silver Creek is a General Use water with zero 7Q10 flow. Watershed Segment IL\_GM-01 has been identified in the proposed project area. The stream has not been assessed under the Illinois Integrated Water Quality Report and Section 305(b)/303(d) program. This stream has a watershed of approximately 5.44 square miles at the point of impact. The stream is not listed as biologically significant nor has it received an integrity rating in the 2008 Illinois Department of Natural Resources Publication *Integrating Multiple Taxa in a Biological Stream Rating System* within the project area. The stream is not enhanced in regards to the dissolved oxygen water quality standard.

The Bensenville Drainage Ditch is a General Use water with zero 7Q10 flow. The stream does not have a Waterbody Segment designation. The stream has not been assessed under the Illinois Integrated Water Quality Report and Section 305(b)/303(d) program. This stream has a watershed of approximately 2.28 square miles at the point of impact. Based on the limited information available the stream was identified as needing additional delineation for chemical parameters. Water quality sampling conducted found no violations of water quality standards and no unusual conditions. The stream is not listed as biologically significant nor has it received a rating in the 2008 Illinois Department of Natural Resources Publication *Integrating Multiple Taxa in a Biological Stream Rating System* within the project area. The stream is not enhanced in regards to the dissolved oxygen water quality standard.

Salt Creek is a General Use water with 7Q10 flow of 23 cfs at the project area. Salt Creek Waterbody Segment IL\_GL-10 has been identified in the proposed project area. The stream is listed in the Illinois Integrated Water Quality Report and Section 303(d) List-2012 as impaired for Aquatic Life, Fish Consumption and Primary Contact Recreation. The potential causes of impairment to Aquatic Life are Alteration in Stream-side or Littoral Vegetation (non-pollutant), Aquatic Algae (non-pollutant), Aquatic Plants (Macrophytes) (non-pollutant), Arsenic, Chloride, Hexachlorobenzene, Methoxychlor, Nickel, Other Flow Regime Alterations (non-pollutant), dissolved Oxygen, and pH. The potential causes of impairment to Fish Consumption are Mercury and Polychlorinated biphenyls. The potential cause of impairment to Primary Contact Recreation is Fecal Coliform. This stream has a watershed of approximately 55.68 square miles at the point of impact. The stream is not listed as biologically significant; however it has received a "C" rating for both integrity and diversity in the 2008 Illinois Department of Natural Resources Publication *Integrating Multiple Taxa in a Biological Stream Rating System* within the project area. The stream is not enhanced in regards to the dissolved oxygen water quality standard.

Higgins Creek is a General Use water with zero 7Q10 flow. Higgins Creek Waterbody Segments IL\_GOA-01 and IL\_GOA-02 have been identified in the proposed project area. The stream is listed in the Illinois Integrated Water Quality Report and Section 303(d) List-2012 as impaired for Aquatic Life and Primary Contact Recreation. The potential causes of impairment for Segment IL\_GOA-01 to Aquatic Life are Chloride and Phosphorus (Total). The potential cause of impairment to Primary Contact Recreation is Fecal Coliform. The known potential cause of impairment for Segment IL\_GOA-02 is Chloride. The potential cause of impairment for this Segment to Primary Contact Recreation is Fecal Coliform. This stream has a watershed of approximately 5.71 square miles at the point of impact. The stream is not listed as biologically significant nor has it received a rating in the 2008 Illinois Department of Natural Resources Publication *Integrating Multiple Taxa in a Biological Stream Rating System* within the project area. The stream is not enhanced in regards to the dissolved oxygen water quality standard.

Meacham Creek is a General Use water with zero 7Q10 flow. Meacham Creek Waterbody Segment IL\_GLBA has been identified in the proposed project area. The stream is listed in the Illinois Integrated Water Quality Report and Section 303(d) List-2012 as impaired for Aquatic Life. The potential causes of impairment to Aquatic Life are Other Flow Regime Alteration (non-pollutant) and dissolved Oxygen. This stream has a watershed of approximately 5.71 square miles at the point of impact. The stream is not listed as biologically significant nor has it received a rating in the 2008 Illinois Department of Natural Resources Publication *Integrating Multiple Taxa in a Biological Stream Rating System* within the project area. The stream is not enhanced in regards to the dissolved oxygen water quality standard.

Willow Creek is a General Use water with zero 7Q10 flow. Will Creek Waterbody Segment IL\_G0-01 has been identified in the proposed project area. The stream is listed in the Illinois Integrated Water Quality Report and Section 303(d) List-2012 as impaired for Aquatic Life. The potential causes of impairment to Aquatic Life are Alteration in Stream-Side or Littoral Vegetation (non-pollutant), Loss of Instream Cover (non-pollutant) and Phosphorus (Total). This stream has a watershed of approximately 6.57 square miles at the point of impact. The stream is not listed as biologically significant, but it has received a "D" rating for diversity in the 2008 Illinois Department of Natural Resources Publication *Integrating Multiple Taxa in a Biological Stream Rating System* within the project area. The stream is not enhanced in regards to the dissolved oxygen water quality standard.

Spring Brook is a General Use water with zero 7Q10 flows. Spring Brook Waterbody Segment IL\_GLB-07 has been identified in the proposed project area. The stream is listed in the Illinois Integrated Water Quality Report and Section 303(d) List-2012 as impaired for Aquatic Life. The potential causes of impairment to Aquatic Life are Alteration in Stream-side or Littoral Vegetation (non-pollutant), Aquatic Algae (non-pollutant), DDT, Endrin, Hexachlorobenzene, Other Flow Regime Alterations (non-pollutant), dissolved Oxygen, Phosphorus (Total), Sedimentation/Siltation and Total Suspended Solids (TSS). This stream has a watershed of approximately 14.12 square miles at the point of impact. The stream is not listed as biologically significant nor has it received a rating in the 2008 Illinois Department of Natural Resources Publication *Integrating Multiple Taxa in a Biological Stream Rating System* within the project area. The stream is not enhanced in regards to the dissolved oxygen water quality standard.

The Devon Avenue Tributary is a General Use water with zero 7Q10 flow. The stream does not have a Waterbody Segment designation. The stream has not been assessed under the Illinois Integrated Water Quality Report and Section 305(b)/303(d) program. This stream has a watershed of approximately 1.58 square miles at the point of impact. Based on the limited information available the stream was identified as needing additional delineation for biological and chemical parameters. Biological characterization of the Devon Avenue Tributary was provided by the applicant in a study conducted by a consultant, Christopher Burke Engineering, Ltd., entitled Habitat Evaluation, Fish and Aquatic Macroinvertebrate Sampling at Devon Avenue Tributary, Itasca, DuPage County, Illinois. Of note for this stream survey was that it was conducted very late in the season (November 20, 2012) and after a severe summer drought. The study report notes that the stream is in a highly urbanized environment and has in-line impoundments along its course that constitute most of the linear course of the stream. Instream habitat was noted to be poor at one sampling site and fair at the other. The fish community consisted of three species at the first site and two at the second. Typical stream species such as darters and small minnows were absent. The fish present may have survived the drought in the in-line ponds and then repopulated the flowing areas when water returned. An alternate explanation for the poor fish population is that the dams for the in-line ponds prevent stream species from populating the flowing portions of the system. The macroinvertebrate community lacked EPT representatives, consisted of mostly Physa-type snails and again may represent a community recovering from severe drought. The consultant did not apply an IEPA type macroinvertebrate biotic index, but if this index were to be calculated, a poor result would have been obtained as the organisms found were from pollution tolerant taxa. IEPA's conclusion is that the Devon Avenue tributary has poor fish and macroinvertebrate communities reflecting its urban, highly impounded nature. Water quality sampling conducted in conjunction with the biological study found no violations of water quality standards and no unusual conditions. The stream is not listed as biologically significant nor has it received a rating in the 2008 Illinois Department of Natural Resources Publication *Integrating Multiple Taxa in a Biological Stream Rating System* within the project area. The stream is not enhanced in regards to the dissolved oxygen water quality standard.

### Identification of Proposed Pollutant Load Increases or Potential Impacts on Uses.

Increased impervious surface area due to construction and compaction of soils by heavy equipment may result in less stormwater infiltration and additional stormwater runoff. Instream construction, placement of structures (e.g., abutments and piers), streambank disturbance, channel realignment, and temporary crossings could cause increases in turbidity and sedimentation and temporarily alter downstream hydraulics and substrate conditions. Downstream aquatic systems could be temporarily affected by the increases in turbidity and sedimentation. Increased sedimentation during construction has the potential to cover stream substrate, thereby affecting habitat for some species of fish and macroinvertebrates. The magnitude of impact varies based on several factors, such as proposed type of crossing, number of crossings, stream characteristics (substrate, depth, current velocity), soil type, construction method, and implementation of best management practices. The placement of culverts will permanently alter aquatic habitat. Table 1-1; *Streams Crossed by the Proposed Project in the Existing and Proposed Condition* outlines the proposed stream crossing and related activity.

**Table 1-1**  
**Waters of the U.S. Impact and Compensation Summary**

Stream	Description of Existing Crossing	Description of Proposed Crossing/Impact <sup>a</sup>	Additional Linear Feet of Stream Enclosed in Culvert (Proposed Condition)/Net Loss of Change	Impact (acre) <sup>a</sup>	USACE Mitigation Ratio	USACE Wetland Mitigation Credits Required (acre)
Addison Creek Watershed						
Addison Creek	Two-cell, 10-foot (span) x 9.5-foot (rise) concrete box culvert at I-294	Extend culvert approximately 20 feet to the east and 10 feet to the west and install velocity/erosion protection, as necessary	30	0.053	5:1	0.265
Des Plaines River (main stem) Watershed						
Bensenville Drainage Ditch	No crossing in project corridor	Extend railroad culvert (constructed as part of OMP) east approximately 367 feet or bridge. Proposed structure to be determined during detailed engineering. Install velocity/erosion protection, as necessary	367 <sup>b</sup>	0.320 <sup>b</sup>	To be determined <sup>b</sup>	To be determined <sup>b</sup>
Salt Creek Watershed						
Meacham Creek	10-foot (span) x 8-foot (rise) concrete box culvert at Elgin-O'Hare Expressway	Extend existing drainage structure south approximately 12 feet and install velocity/erosion protection, as necessary	12	0.008	5:1	0.040
Salt Creek	At Thorndale Avenue: Two-span, prestressed concrete beam bridge carrying Thorndale Avenue over creek. Center pier is pile supported with solid	Construct two new bridges to carry east and westbound Elgin O'Hare over creek. New bridges will span the creek. No piers will be placed in the creek	Not applicable	0	5:1	0

**Table 1-1****Waters of the U.S. Impact and Compensation Summary**

Stream	Description of Existing Crossing	Description of Proposed Crossing/Impact <sup>a</sup>	Additional Linear Feet of Stream Enclosed in Culvert (Proposed Condition)/Net Loss of Change	Impact (acre) <sup>a</sup>	USACE Mitigation Ratio	USACE Wetland Mitigation Credits Required (acre)
	cast-in-place concrete wall around piles					
Willow Creek Watershed						
Higgins Creek (I-90 east of Elmhurst Road)	Two 2-span, prestressed concrete beam bridges with center pier in creek for eastbound/westbound I-90	Widen both existing I-90 bridges (with center pier in creek). Construct two new bridges over the creek, one to the north and one to the south of I-90 for ramps (these new bridges will span the creek and will not require piers to be placed in the creek)	Not applicable	0.006	5:1	0.030
Higgins Creek (at Touhy Avenue)	Two-cell, 13.5-foot (span) x 8-foot (rise) concrete box culvert at railroad and Touhy Avenue	New bridge to span creek and existing culvert (culvert to remain for railroad)	Not applicable	0	5:1	0
Higgins Creek (Elmhurst Road)	Single 25-foot concrete slab bridge at Elmhurst Road	Widen and replace existing bridge. Install scour protection, as necessary	Not applicable	0.016	5:1	0.080
Higgins Creek (I-90 north embankment west of Elmhurst Road)	No crossing in project corridor	Linear impact along the south bank of Higgins Creek for the proposed westbound I-90 ramp from southbound Elmhurst Road. Construct outfall(s) for a proposed compensatory storage site at the northwest quadrant of the I-90/Elmhurst Road interchange and EOWA drainage system. Install velocity/erosion protection, as necessary	Not applicable	0.106	5:1	0.530
Higgins Creek headwaters (I-90 approximately two miles west of Elmhurst Road)	Two-cell, 9-foot (span) x 4-foot (rise) concrete box culvert at I-90	Extend existing drainage structure southwest (upstream) approximately 15 feet	15	0.016	5:1	0.080

**Table 1-1**  
**Waters of the U.S. Impact and Compensation Summary**

Stream	Description of Existing Crossing	Description of Proposed Crossing/Impact <sup>a</sup>	Additional Linear Feet of Stream Enclosed in Culvert (Proposed Condition)/Net Loss of Change	Impact (acre) <sup>a</sup>	USACE Mitigation Ratio	USACE Wetland Mitigation Credits Required (acre)
Higgins Creek Tributary A	Two-cell, 9-foot (span) x 5.75-foot (rise) concrete box culvert at I-90	Replace and realign existing culvert with a two-cell box culvert with a 12-foot (span) x 8-foot (rise) effective opening	142	0.089	5:1	0.445
Willow Creek (downstream of York Road)	No crossing in project corridor	Install new culverts and/or extend three existing drainage structures from the O'Hare access road beneath the proposed West Bypass embankment	881 <sup>b</sup>	1.170 <sup>b</sup>	To be determined <sup>b</sup>	To be determined <sup>b</sup>
Willow Creek South Tributary	Three-cell, 10-foot (span) x 4-foot (rise) concrete box culvert at Thorndale Avenue	Existing Thorndale Avenue culvert would be removed, replaced, and realigned. Existing channel between Thorndale Avenue and York Road would be filled and slightly shifted	1,273 <sup>c</sup>	0.721	5:1	3.605
Willow Creek South/North Tributaries (upstream of York Road)	Three trapezoidal channels under a dry land bridge at York Road. The three different channels have varying dimensions in regard to top width, bottom width, and depth	Maintain condition at York Road	Not applicable	0	5:1	0
Drainage Ditch to Higgins Creek	4-foot concrete pipe at Busse Road; 9-foot (span) x 4-foot (rise) box culvert at Oakton Avenue	Existing culvert to be extended to the east at Oakton Avenue. Existing ditch to be re-graded to provide detention storage volume	33	0.123	5:1	0.615
Drainage Ditch to Higgins Creek	No crossing in project corridor	Existing ditch to be re-graded/shifted. New storm sewer to be installed in areas with ditch capacity constraints	503	0.302	5:1	1.510
Drainage Ditch to Willow-Higgins Creek	18-inch concrete pipe at Touhy Avenue	Existing structure to remain on south side of Touhy Avenue	Not applicable	0	5:1	0
Drainage Ditch to Devon	Four culverts in series: two 5-foot x 3-foot elliptical concrete	Replace existing culverts with single box culvert with 9-foot (span) x 3-	207	0.010	5:1	0.050



**Table 1-1**  
**Waters of the U.S. Impact and Compensation Summary**

Stream	Description of Existing Crossing	Description of Proposed Crossing/Impact <sup>a</sup>	Additional Linear Feet of Stream Enclosed in Culvert (Proposed Condition)/Net Loss of Change	Impact (acre) <sup>a</sup>	USACE Mitigation Ratio	USACE Wetland Mitigation Credits Required (acre)
Avenue Tributary Ponds	pipes, one 5-foot x 3-foot elliptical corrugated metal pipe, and one 4.5-foot x 3-foot elliptical corrugated metal pipe in series	foot (rise) effective opening. Install velocity/erosion protection, as necessary				
Devon Avenue Tributary (ponds)	No crossing in project corridor	Replace existing outfall and install outlet protection	Not applicable	0.003	5:1	0.015
Tributary to Meacham Creek	12.7- foot (span) x 3.75-foot (rise) box culvert	Extend existing drainage structure approximately 40 feet north and 35 feet south. Install velocity/erosion protection, as necessary	75	0.027	5:1	0.135
Total <sup>b</sup>			3,538	2.970	--	7.400 <sup>d</sup>

<sup>a</sup> Impact area includes the placement of fill material (e.g., culverts, scour protection, bridge piers, retaining walls, etc.) in waters of the U.S. Temporary impacts (if any) will be identified in detailed construction packages.

<sup>b</sup> Bensenville Drainage Ditch and Willow Creek are being realigned as part of a separate project at O'Hare Airport. Impacts are based on the realigned condition (as part of the OMP). The required mitigation ratio to compensate for impacts to these waters has yet to be determined by the USACE. Impacts at Bensenville Drainage Ditch are based on the culvert installation scenario, which would result in greater impacts.

<sup>c</sup> In existing condition, Willow Creek South Tributary consists of approximately 3,905 linear feet open channel and 296 linear feet enclosed in culvert within the project corridor. In proposed condition, Willow Creek South Tributary will consist of approximately 1,743 linear feet of open channel and 1,185 linear feet enclosed in culvert.

<sup>d</sup> Does not include mitigation for Bensenville Drainage Ditch and Willow Creek at O'Hare Airport. The mitigation ratio to compensate for impacts to these waters has yet to be determined by the USACE.

Maintenance impacts associated with the proposed project include herbicide spraying for invasive/noxious vegetative species within the right-of-way.

It is not possible to construct this project and completely avoid wetland impacts. Existing wetlands are located within and adjacent to the project corridor associated with existing right-of-way, expressways, other roads, and rail lines. Any road widening or additional rail lines would impact wetlands in these locations. The project corridor is located in a constrained, developed area with many adjacent urban land uses. Minimization of residential, commercial, and industrial displacements or other potential socioeconomic or environmental impacts make it difficult or impractical to shift the proposed alignment to avoid additional wetland impacts.

Seasonal deicing with salt (commonly sodium chloride), along with plowing and other alternative measures, are used to reduce snow and ice build-up on roads. Deicing assists with safe traffic movement by improving road conditions in winter, but application of road salt contributes chloride loads to surface waters. Road salt is highly soluble and moves through the environment in solution as runoff, splash, spray, and dust. Chlorides used for road deicing are a primary pollutant associated with highway maintenance. The General Use Water Quality Standard for chloride in Illinois is 500 milligram per liter (mg/L). Sodium does not have a numeric water quality standard.

### **Fate and Effect of Parameters Proposed for Increased Loading.**

Soil erosion and sediment control measures would be installed in areas of active construction. Special attention would be given to particular areas such as wetlands, surface waters, highly erodible soils, and drainage ways. Disturbance of streamside vegetation and riparian vegetation would be kept to a minimum. Temporary fencing or alternative measures would be considered to protect existing vegetation to remain in critical erosion prone areas. In-stream construction (e.g., for the placement of bridge piers) and soil disturbing activities near streams would be conducted during low or no-flow periods, as required. Discharge points would be protected with rock (or an alternative measure) to minimize scour and erosion. Exposed soils adjacent to surface waters and any work on a streambank that is performed below the ordinary high water mark of a stream would be permanently stabilized. Final stabilization would follow the applicable Landscaping and Erosion Control sections of the IDOT and the Illinois Tollway standard specifications.

In-stream construction may be required to install bridge piers, extend culverts, or install new culverts. In-stream construction would follow standard practice (e.g., IDOT *Standard Specification for Road and Bridge Construction* [IDOT, 2012] and the *Tollway Supplemental Specifications* [Illinois Tollway, 2011]), including isolating the work area, as necessary. All required permits and approvals would be obtained prior to any in-stream construction. Additional details regarding construction methodology would be provided during CWA and floodway construction permitting. Flow would be maintained during construction in perennial streams by using dam and pumping, fluming, culverts, or other techniques. Cofferdams, if necessary, would be constructed of nonerodible materials; earthen embankments or dikes would not be used as cofferdams. If dewatering is required to perform “work in the dry” in perennial streams, the dewatering would be temporary in nature. All materials used for temporary construction activities would be moved to upland areas following completion of the construction activity. Temporarily disturbed areas would be restored to preconstruction conditions, including grading to original contours and installation of erosion control as soon as practicable. Erosion and sediment controls would be used to minimize downstream impacts.

To allow for wildlife connectivity and fish habitat, new culverts greater than 48 inches in diameter or height associated with waters of the U.S. are proposed to be enlarged and buried with stream bedding material approximately six to twelve inches. New culverts to be buried include I-90 over Higgins Creek and Elmhurst Road over Higgins Creek, culverts associated with the proposed Elgin-O’Hare Expressway and West Bypass interchange ramps over Willow Creek South Tributary, and culverts associated with the headwaters of Devon Avenue Tributary. The buried depth was determined based on standard culvert sizes. For example, the two-cell, 12-foot (span) x 9-foot (rise) concrete box culverts at I-90 over Higgins Creek would be 12-foot (span) x 10-foot (rise) culverts, and buried one foot. Linear feet of stream (see Table 1-1) eliminated during construction will be mitigated, as much as feasibly possible, with streams in or near the project area. If this is not possible, the applicant will provide mitigation for the eliminated streams at USACE approved off-site locations at a required 5:1 ratio.

If untreated, stormwater runoff containing highway pollutants could cause further degradation of receiving waters, erosion, harm or stress to aquatic life, and decreased recreational use and aesthetics. Therefore, best management practices will be incorporated into the ICP Plans to minimize adverse impacts to the downstream aquatic environment. Water quality will be managed through a combination of stormwater runoff and drainage collection facilities, and the implementation of other post-construction best management practices in accordance with state and federal water quality goals for managing the water quality of impaired or degraded streams. To the extent practicable, improvements will be designed so that stormwater runoff quality will be improved with capture infiltration, detention, or other stormwater treatment before discharge to surface waters.

Herbicide applications would follow the manufacturer’s guidelines to minimize drift and runoff into surface waters. An NPDES permit for pesticide application point source discharges (including herbicide application) will be obtained, as necessary.

Surface water impacts (including adverse impacts to fish and aquatic macroinvertebrates) as a result of construction of the proposed EOWA project are anticipated to be minimal with routine and storm-event site inspections and the

implementation of appropriate best management practices. Mitigation for permanent fill placed in jurisdictional waters of the U.S. would be accomplished in conjunction with wetland mitigation either through purchasing credits in a USACE-approved mitigation bank or on-site mitigation. In accordance with the federal Compensatory Mitigation Rule mitigation hierarchy, the applicant will purchase credits in the Pine Dunes Wetland Mitigation Area. Table 2-1; *Wetland Impact and Compensation Summary* are the proposed wetland mitigation credits necessary for this project.

**Table 2-1  
Wetland Impact and Compensation Summary**

Wetland Type	Total Wetland Size (acre) <sup>a</sup>	Impact Area (acre)	Permanent Wetland Impact Cause	Function	USACE Mitigation Ratio	USACE Wetland Mitigation Credits Required (acre)
marsh	2.97	0.004	Construction of ramp connecting northbound Arlington Heights Road to eastbound I-90	surface water storage, fair quality wildlife habitat	1.5:1	0.006
marsh	0.03	0.03	Widening Elmhurst Road and improvements at Wille Road intersection	surface water storage	1.5:1	0.045
marsh	0.74	0.74	Construction of ramps for West Bypass and I-90 system interchange	surface water storage	1.5:1	1.110
marsh/pond	1.85	0.32	Construction of detention facility and ramps for West Bypass and I-90 system interchange	surface water storage	1.5:1	0.480
wet shrubland	0.26	0.26	Construction of IL 72 and Elmhurst Road quadrant bypass	surface water storage	1.5:1	0.390
wet shrubland/marsh	1.94	1.94	Improvements to York Road associated with Elgin-O'Hare Expressway/West Bypass system interchange; Construction of compensatory storage basin	surface water storage, wildlife habitat	1.5:1	2.910
wet shrubland/marsh	0.97	0.56	Construction of ramp connecting O'Hare Airport with York Road as part of Elgin-O'Hare Expressway/West Bypass system interchange	surface water storage, wildlife habitat	1.5:1	0.840
wet shrubland	0.25	0.25	Construction of compensatory storage basin,	surface water storage, wildlife habitat	1.5:1	0.375

**Table 2-1  
Wetland Impact and Compensation Summary**

Wetland Type	Total Wetland Size (acre) <sup>a</sup>	Impact Area (acre)	Permanent Wetland Impact Cause	Function	USACE Mitigation Ratio	USACE Wetland Mitigation Credits Required (acre)
			drainage structure, and ramps for Elgin-O'Hare Expressway/West Bypass system interchange			
marsh	0.43	0.43	Construction of stormwater detention facility and ramp for Elgin-O'Hare Expressway/West Bypass system interchange	surface water storage, wildlife habitat	1.5:1	0.645
forested depression	0.25	0.25	Construction of eastbound Elgin-O'Hare Expressway and ramp for Elgin-O'Hare Expressway/West Bypass system interchange	surface water storage, wildlife habitat	1.5:1	0.375
wet meadow	0.41	0.41	Construction of drainage structure and ramps for Elgin-O'Hare Expressway/West Bypass system interchange	surface water storage, wildlife habitat	1.5:1	0.615
wet shrubland/marsh	0.30	0.30	Replacement of a driveway connection to Thorndale Avenue; Utility installation	surface water storage	1.5:1	0.450
marsh	0.98	0.17	Construction of Frontage Road	surface water storage	1.5:1	0.255
wet shrubland	0.70	0.05	Construction of ramp connecting York Road to O'Hare Airport	surface water storage, wildlife habitat	1.5:1	0.075
marsh	0.63	0.63	Construction of entrance ramp connecting Franklin Avenue/Green Street at County Line Road to northbound West Bypass	surface water storage, wildlife habitat	1.5:1	0.945
forested depression	0.51	0.51	Excavation for stormwater detention facility	surface water storage, wildlife habitat	1.5:1	0.765
marsh	0.20	0.20	Construction of	surface water	1.5:1	0.300

**Table 2-1  
Wetland Impact and Compensation Summary**

Wetland Type	Total Wetland Size (acre) <sup>a</sup>	Impact Area (acre)	Permanent Wetland Impact Cause	Function	USACE Mitigation Ratio	USACE Wetland Mitigation Credits Required (acre)
			stormwater detention facilities	storage		
marsh	7.35	0.16	Widening improvements to ramp connecting westbound Elgin-O'Hare Expressway to southbound Gary Avenue	high quality wildlife habitat, large amount of surface water storage	5:1	0.800
wet meadow	0.08	0.08	Ramp improvements	surface water storage	1.5:1	0.120
marsh	1.19	0.13	Addition of side path north of Frontage Road between IL 19 and Rodenburg Road	wildlife habitat, surface water storage	1.5:1	0.195
marsh	0.10	0.10	Widening improvements to Elgin-O'Hare Expressway eastbound lanes and ramp connecting IL 19 to expressway	surface water storage	1.5:1	0.150
marsh	3.78	0.13	Improvements to eastbound Frontage Road between Rodenburg Road and Wright Boulevard	wildlife habitat, surface water storage	1.5:1	0.195
forested depression	0.20	0.07	Improvements to ramp connecting Roselle Road to westbound lanes of Elgin-O'Hare Expressway	wildlife habitat, surface water storage	1.5:1	0.105
marsh/pond	13.34	0.25	Improvements to ramp connecting Meacham Road to westbound lanes of Elgin-O'Hare Expressway; Installation of outlet protection	wildlife habitat, surface water storage, heritage/recreation	1.5:1	0.375
marsh	31.43	0.34	Improvements to ramp connecting eastbound lanes of Elgin-O'Hare Expressway to Medinah Road and widening of EO-WB mainline	wildlife habitat, large amount of surface water storage, heritage/recreation	5.5 (Note: Based on field observations, this is not a critical wetland)	1.870

**Table 2-1  
Wetland Impact and Compensation Summary**

Wetland Type	Total Wetland Size (acre) <sup>a</sup>	Impact Area (acre)	Permanent Wetland Impact Cause	Function	USACE Mitigation Ratio	USACE Wetland Mitigation Credits Required (acre)
marsh	0.52	0.52	pavement Construction of eastbound Frontage Road between Medinah Road and Rohlwing Road; Ramp construction	wildlife habitat, surface water storage	1.5:1	0.780
marsh/pond	1.93	0.26	Improvements to Rohlwing Road and addition of sidewalk on west side of roadway; Utility installation	wildlife habitat, surface water storage	1.5:1	0.390
marsh	2.93	0.52	Improvements to Rohlwing Road and addition of side path on east side of roadway; Utility installation	surface water storage	1.5:1	0.780
marsh	0.34	0.34	Construction of ramps and improvements to eastbound lanes of Elgin-O'Hare Expressway	surface water storage	1.5:1	0.510
marsh	3.21	3.21	Construction of multiple ramps, expressway improvements, and stormwater detention facilities associated with system interchange between Elgin-O'Hare Expressway and I-290	surface water storage	1.5:1	4.815
marsh	0.49	0.49	Construction of ramp and stormwater detention facility associated with system interchange between Elgin-O'Hare Expressway and I-290	surface water storage	1.5:1	0.735
marsh	0.89	0.89	Construction of multiple ramps and a stormwater management facility associated with system	surface water storage	1.5:1	1.335

**Table 2-1  
Wetland Impact and Compensation Summary**

Wetland Type	Total Wetland Size (acre) <sup>a</sup>	Impact Area (acre)	Permanent Wetland Impact Cause	Function	USACE Mitigation Ratio	USACE Wetland Mitigation Credits Required (acre)
			interchange between Elgin-O'Hare Expressway and I-290			
marsh	0.02	0.02	Utility installation	surface water storage	1.5:1	0.030
pond	0.32	0.32	Shifting of Park Boulevard to accommodate ramp improvements and re-grading existing stormwater wetland pond to maintain capacity	surface water storage	1.5:1	0.480
restored wet prairie	0.23	0.05	Construction access and re-grading adjacent, existing stormwater wetland pond (Wetland 149)	surface water storage	1.5:1	0.075
marsh	0.16	0.16	Construction of ramp connecting northbound I-290 with eastbound Elgin-O'Hare Expressway	surface water storage	1.5:1	0.240
marsh	0.99	0.99	Construction of ramp connecting westbound Elgin-O'Hare Expressway with northbound I-290	surface water storage	1.5:1	1.485
pond	1.53	0.47	Utility installation	surface water storage	1.5:1	0.705
forested depression	5.18	0.72	Construction of ramp connecting southbound I-290 with local access to Park Boulevard, an adjacent noise wall, and drainage structure	wildlife habitat, surface water storage	1.5:1	1.08
wet meadow	0.32	0.32	Installation of drainage structure, construction of new Frontage Road along north side of Elgin-O'Hare Expressway, and future Tollway maintenance yard	surface water storage	1.5:1	0.480
pond	0.24	0.04	Utility/storm sewer	surface water	1.5:1	0.060

**Table 2-1  
Wetland Impact and Compensation Summary**

Wetland Type	Total Wetland Size (acre) <sup>a</sup>	Impact Area (acre)	Permanent Wetland Impact Cause	Function	USACE Mitigation Ratio	USACE Wetland Mitigation Credits Required (acre)
			installation	storage, heritage/ recreation		
wet meadow	2.48	0.86	Construction of Elgin-O'Hare Expressway and utility installation	flood water storage, streambank stabilization, wildlife habitat, heritage/ recreation	1.5:1	1.290
marsh	0.47	0.47	Construction of Elgin-O'Hare Expressway and compensatory storage basin	wildlife habitat, surface water storage, heritage/ recreation	1.5:1	0.705
detention pond wetland	1.83	1.83	Construction of Elgin-O'Hare Expressway and compensatory storage basin	surface water storage, wildlife habitat, heritage/ recreation	1.5:1	2.745
marsh	0.20	0.20	Construction of Eastbound Frontage Road and ramp connecting Wood Dale Road to eastbound Elgin-O'Hare Expressway	surface water storage	1.5:1	0.300
forested depression	0.81	0.81	Construction of eastbound lanes of Elgin-O'Hare Expressway and new Frontage Road including an adjacent side path	wildlife habitat, surface water storage	1.5:1	1.215
pond	0.21	0.21	Construction of westbound lanes of Elgin-O'Hare Expressway and ramp	surface water storage	1.5:1	0.315
forested depression	1.03	1.03	Construction of the Elgin-O'Hare Expressway	wildlife habitat, surface water storage	1.5:1	1.545
forested depression	0.34	0.34	Construction of eastbound lanes of Elgin-O'Hare Expressway, new Frontage Road, and drainage structure	wildlife habitat, surface water storage	1.5:1	0.510
marsh	0.14	0.14	Construction of westbound lanes of Elgin-O'Hare Expressway	surface water storage	1.5:1	0.210
wet	0.06	0.06	Construction of	surface water	1.5:1	0.090



**Table 2-1  
Wetland Impact and Compensation Summary**

Wetland Type	Total Wetland Size (acre) <sup>a</sup>	Impact Area (acre)	Permanent Wetland Impact Cause	Function	USACE Mitigation Ratio	USACE Wetland Mitigation Credits Required (acre)
meadow			eastbound lanes of Elgin-O'Hare Expressway	storage		
marsh	0.14	0.14	Construction of eastbound lanes of Elgin-O'Hare Expressway	surface water storage	1.5:1	0.210
marsh	0.20	0.20	Construction of westbound lanes of Elgin-O'Hare Expressway	surface water storage	1.5:1	0.300
marsh	0.09	0.01	Utility installation	surface water storage	1.5:1	0.015
marsh	0.12	0.01	Widening of Touhy Avenue and culvert extension	surface water storage	1.5:1	0.015
wet meadow	0.88	0.38	Grading to construct a compensatory floodplain storage facility	flood water storage, streambank stabilization, wildlife habitat, heritage/recreation	1.5:1	0.570
marsh	0.02	0.02	Drainage pipe installation and construction of stormwater detention facility	surface water storage	1.5:1	0.030
wet meadow	0.19	0.19	Extension of Park Boulevard to intersect with Pierce Road	surface water storage	1.5:1	0.285
marsh	0.32	0.32	Road widening along Franklin Avenue	surface water storage	1.5:1	0.480
<b>Total</b>	<b>99.72</b>	<b>24.85</b>				<b>39.20</b>

Note: Impacts to unvegetated waters of the U.S. are not included in this table. Temporary impacts (if any) will be identified in detailed construction packages.

<sup>a</sup> Some wetlands may extend beyond the study limit. Acreage is based on delineated area.

<sup>b</sup> Compensation is based on the mitigation ratios in the IWPA (Standard Review Action and mitigation located offsite within basin).

Due to the existence of a chloride TMDL or chloride being given as a cause of impairment for most of the streams receiving runoff from the new highway lanes, no increase in chloride loading is allowable for this project. The applicant therefore set about to identify the added chloride the new lanes would contribute in order to know the amount that must be offset elsewhere in the watersheds. A partnership was formed by the applicant with the DuPage River/Salt Creek Watershed Group (DRSCW). This group had previous experience in reducing chloride loading in the watersheds with a completed TMDL (West Branch DuPage and Salt Creek). The partnership will result in a document (Memorandum of Understanding) detailing the steps that the applicant would take to offset additional chloride loading and therefore cause no additional loading issues to watersheds that were already too laden with chloride.

Even though chloride is dissolved in the stormwater runoff, the daily annual maximum chloride concentration might be reduced by using structural BMPs. BMPs, such as detention ponds, infiltration basins/trenches, and vegetated swales/bioswales with ditch checks, may be able to attenuate the peak concentration of stormwater flows by mixing chlorides with permanent pool volumes in existing wet ponds and/or by collecting the runoff and allowing it to mix with lower-concentration runoff.

Of the streams in the project corridor, a chloride TMDL is in effect for Addison Creek, Salt Creek, and West Branch DuPage River. However, the TMDL and BMPs to address chloride loads can be applied to protect other streams located downstream of the proposed project, as well. Elevated levels of chloride in receiving streams are seasonal and occur predominantly during the winter months as a result of salt application. Although road deicing is necessary, the overall goal of the TMDL is to reduce chloride loading caused by winter road salting applications. Organizations, such as the DRSCW, have presented seminars on deicing best practices to educate those involved in the maintenance of public roads.

As part of a chloride offset program for the Elgin O'Hare Western Access (EOWA) project, winter deicing efficiencies have been evaluated for Illinois Tollway and partnering communities. Technology experts have indicated a move towards using more liquid deicers provides efficiency in salt use. Improved efficiency results in less rock salt use. The use of liquid brine through pre-wetting and anti-icing practices was investigated for the EOWA project. Pre-wetting involves applying salt brine directly to the surface of bulk salt solids prior to conventional deicing. The pre-wetting rapidly activates the salt melting process and reduces the degree of bounce-and-scatter of salt off the roadway surface. Anti-icing involves the application of brines or organic products to the roadway surface prior to a snow or ice event to prevent or weaken the bond between the snow or ice and the pavement surface. Preventing a bond to the pavement allows for easier and more efficient snow removal. Both practices provide considerable benefit to snow and ice management agencies.

Based on the estimate of current salt use in the watershed areas, the ability to offset the increased salt usage for the ICP is clearly achievable with the use of pre-wetting and anti-icing practices. With the project, the overall reduction in salt needed to achieve no net increase as well as the 25 percent margin of safety is 4,860 tons/year. Offsets will be made through a combination of Illinois Tollway reductions and partnership with local communities. For the Des Plaines River and DRSCW watersheds, the offsets available through local communities easily exceed the offset totals needed. As proposed, the road salt offsets by the applicant should result in no increase in chloride loading from this project. If necessary, additional offsets can be achieved from further reductions upstream, from other Illinois Tollway operations not part of the EOWA project, other potential partners, or combinations of these options.

To track improvements in salt usage, both annual tons of salt applied and a typical storm application rate will be tracked to take into account variation in winter conditions from year to year. The implementation of these anti-icing practices will be applicable to both the Illinois Tollway and local communities. The actual mix of these practices will be determined individually for each entity with the objective of tailoring salt reducing practices that best fit the community needs and yields a substantive reduction in salt use. The framework of this program involves a strategic alliance with the DuPage River Salt Creek Workgroup (DRSCW), other strategic watershed groups, and local units of government for advancing salt reduction in streams affected by the project. Moving forward, the Illinois Tollway will administer and manage the overall salt reduction program for the project with guidance and support from the DRSCW. The partnership with the DRSCW will be formalized with a Memorandum of Understanding (MOU). Working arrangements with local units of government will be formalized with the use of an Intergovernmental Agreement (IGA). IGAs will be established with communities that are directly adjacent to the EOWA project and would include Hanover Park, Schaumburg, Roselle, Itasca, Elk Grove Village, Wood Dale, Bensenville, Des Plaines, Mount Prospect, Franklin Park, City of Chicago, North Lake, and Elmhurst. IGAs would also be established with DuPage and Cook counties, and local townships.

#### **Purpose and Anticipated Benefits of the Proposed Activity.**

The roadway improvements are proposed to be developed as a toll road that is comprised of approximately 25 miles of mainline improvements, including 14 miles of existing roadways and 11 miles of new alignment. The roadway

improvements include four system interchanges, 16 service interchanges, and arterial improvements at service interchanges to accommodate traffic movement to and from the mainline.

This activity will provide construction jobs during and after the project. It will improve regional and local travel and improve overall travel efficiency. It will improve western access to O'Hare Airport. Improved modal options and connectivity will also occur because of this project. The project will also maintain and improve stormwater management, drainage, and downstream water quality within and adjacent to the corridor.

#### **Assessments of Alternatives for Less Increase in Loading or Minimal Environmental Degradation.**

The applicant went through an extensive planning process that included multiple public transportation options. A thorough evaluation of chloride loading was conducted that resulted in a no increase in loading. Further analysis of alternatives to roadway expansion was not required given the goals of the project.

#### **Summary Comments of the Illinois Department of Natural Resources, Regional Planning Commissions, Zoning Boards or Other Entities**

Illinois Department of Natural Resources sent a correspondence to the Illinois Department of Transportation on April 18, 2012 that stated no threatened and endangered species were identified for the project area and this review was valid for a two year period.

#### **Agency Conclusion.**

This preliminary assessment was conducted pursuant to the Illinois Pollution Control Board regulation for Antidegradation found at 35 Ill. Adm. Code 302.105 (antidegradation standard) and was based on the information available to the Agency at the time the assessment was written. We tentatively find that the proposed activity will result in the attainment of water quality standards; that all existing uses of the receiving stream will be maintained or mitigated; that all technically and economically reasonable measures to avoid or minimize the extent of the proposed increase in pollutant loading have been incorporated into the proposed activity; and that this activity will benefit the community at large by providing needed traffic capacity and travel efficiency, improved system linkages and community access, reduced traffic crashes, increased user benefits including travel times, and enhanced economic growth for the region. Comments received during the 401 Water Quality Certification public notice period will be evaluated before a final decision is made by the Agency.