

**Illinois Environmental Protection Agency
Bureau of Water, Permit Section
(IEPA)**

2520 West Iles, Post Office Box 19276, Springfield, Illinois 62794-9276, 217/782-3362

The IEPA has issued a Public Notice of a request for a Clean Water Act Section 401 water quality certification that would allow the issuance of a federal permit for the discharge of pollutants to waters of the State.

Public Notice Beginning Date:

Friday, October 24, 2025

Public Notice Ending Date:

Thursday, November 13, 2025

Agency Log No.: C-0387-25

Federal Permit Information: Federal permit/license no. MVS-2023-433 is under the jurisdiction of St. Louis District, Regulatory Branch U.S. Army Corps of Engineers

Name and Address of Discharger: Mid-America St. Louis Airport, Darren James - 9656 Air Terminal Drive, Mascoutah, IL 62258

Discharge Location: In Section 7 of Township 1-North and Range 6-West of the West 3rd Principal Meridian in St. Clair County. Additional project location information includes the following: 9656 Air Terminal Drive, Mascoutah, IL 62258

Name of Receiving Water: Wetlands adjacent to Silver Creek

Project Name/Description: Mid-America St. Louis Airport Tree Obstruction Removal - proposed removal of approx. 109 acres of trees to provide a safe airspace around the airport

Construction Schedule: Immediate

The Public Notice period will begin and end on the dates indicated in the heading of this Public Notice. Interested persons are invited to submit written comments on the project to the IEPA at the above address. Commenters must provide their name and address along with comments on the certification request. The IEPA Log number must appear on each comment page. Commenters may include a request for public hearing. Only hearing requests and comments that pertain to Clean Water Act Section 401 authority will be considered. This authority provides consideration of whether the permit or license would be consistent with Sections 301, 302, 303, 306, or 307 of the CWA, as well as "any other appropriate requirement of State [or tribal] law". Requests for additional comment period must provide a demonstration of need. The final day of comment acceptance will be on the Public Notice Ending date shown above, unless the IEPA grants an extended notice period. The attached Fact Sheet provides a detailed description of the project and the findings of the IEPA's antidegradation assessment.

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 see the contact information below.

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Post Document. No. C-0387-25-10242025-PublicNoticeAndFactSheet.pdf

401 Water Quality Certification Fact Sheet for Mid America St. Louis Airport

IEPA Log No. C-0387-25

Contact: Angie Sutton 217-782-9864

This project was originally submitted under log number C-0209-25 and denied due to non-payment of the certification fee. It has been resubmitted with the required fee and completed worksheet, as required under Section 12.6 of the Environmental Protection Act [415 ILCS 5/12.6].

Mid-America St. Louis Airport has applied for a 401 Water Quality Certification for impacts associated with the removal of 109 Acres (Ac) of trees and a permanent service route in Township 1 North, Range 7 West, Sections 1, 2, 11, and 12, St. Clair County, Illinois at 9656 Air Terminal Drive in Mascoutah. The proposed project is part of the 2021 Mid-America St. Louis Airport (BLV) Master Plan Update, Forest Management Plan obstruction survey.

The obstruction survey identified existing and future obstructions to various airspace protection zones. Three areas (Phases 1, 2, and 3) were recommended for removal of 129 Ac of trees. During the winter months of 2022 and 2023, BLV cleared approximately 16 Ac of the 129 Ac of the existing tree obstructions for immediate safety purposes. In 2024, as part of Bi-State Development's MetroLink expansion to the BLV, approximately 4 Ac of the 129 Ac of trees were cleared. Therefore, there are currently approximately 109 Ac of trees remaining on the BLV property that are obstructing views or will eventually obstruct views from the Air Traffic Control Tower (ATCT) and are also penetrating or will penetrate the CFR Part 77 surfaces (FAA Airports Approach/Departure Surfaces; FAA Order 8260.3F, The United States Standard for Terminal Instrument Procedures (TERPS) Surfaces; and Airport Traffic Control Tower Line of Sight). These tree penetrations are considered obstructions to navigation.

The proposed project will impact 71.14 Ac of wetlands of which 64.76 Ac are forested wetlands. Once trees are removed from the forested wetland, approximately 62.91 Ac will be left to revert to emergent wetland. The project will permanently impact 1.85 Ac for construction of the service route to manage future obstructions. This road will also impact 6.38 Ac of emergent wetlands. A total of 4340 cubic yards (CY) of earthen fill, and 6050 CY of rock fill is proposed. Impacts will require 144.13 Ac of mitigation credits that will be purchased from a combination of different mitigation sites.

Information used in this review was obtained from the application documents dated November 22, 2024, March 2025, April 28, 2025, May 22, 2025, and June 18, 2025.

Identification and Characterization of the Affected Water Body.

Throughout 2022 and 2023, Horner & Shifrin and MidAmerica Airport cleared approximately 20 acres of trees to eliminate immediate safety concerns. Site 1 is northwest of the runway by approximately 495 feet and Site 2 is west of the runway by approximately 785 feet. Site 1 sits approximately 640 feet to the

northwest of Site 2; both are bordered by forested canopy to the west and grass cover to the east. After trees were cut, Prairie Engineer conducted a vegetation survey.

In April and May of 2023, and on February 7, 2024, a wetland delineation was conducted. A total of 29 wetlands were identified on the property which were identified as WTL-1 through WTL-29. The wetlands are grouped by classification type and tree clearing phase.

Wetland Classification	Delineation Year	Tree Clearing Phase	Onsite (Ac)	Impacts (Ac)
PEM*	2023	2	2.06	N/A
	2024	Service Route	6.38	6.38
PFO**	2023	1 and 2	62.91	62.91
	2024	Service Route	1.85	1.85
Total			73.20	71.14

*PEM: Palustrine Emergent Wetland

**PFO: Palustrine Forested Wetland

Dominant vegetation was identified by tree clearing phase. The dominant species in both the 2023 Clearing Area (Site 1) and the 2022 Clearing Area (Site 2) was Reed canary grass (*Phalaris arundinacea*). The upland area delineated in 2023 identified the dominant species as bush honeysuckle (*Lonicera maackii*).

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

The pollutant load increases that would occur from this project include some possible increases in total suspended solids. These increases are a normal and unavoidable result of construction, filling and grading that may occur in the wetlands. The existing benthic habitat of the filled wetland would be permanently removed by grading activities. The proposed construction activities include the discharge of 4340 CY of soil fill material and 6050 CY of rock for the access/service road.

Fate and Effect of Parameters Proposed for Increased Loading.

The proposed project will impact a total of 71.14 Ac of wetland. Of the total wetland impacts, 64.76 Ac are forested. Once tree removal is completed, approximately 62.91 Ac will be left to revert to emergent wetlands in order to retain similar function and value. Approximately 1.85 Ac will be permanently impacted for construction of the service road. The remaining 6.38 Ac to be impacted are emergent wetlands that will be permanently filled for construction of the service road. Mitigation credits required will total 144.13 Ac.

Phase	Impact Type	Impact Amount	Wetland Type	Mitigation Ratio	Mitigation Credits
1	Wetland conversion	14.23	Forested	2:1	28.46
2	Wetland conversion	48.68	Forested	2:1	97.36
Service Route	Grading/Fill	1.85	Forested	3:1	5.55
		6.38	Emergent	2:1	12.76
	Total	71.14		Total	144.13

Proposed mitigation consists of purchasing compensatory mitigation credits and placing 210 Ac of forested wetland into a conservation easement. 81 Ac of forested wetlands were previously designated as mitigation for anticipated tree height management for BLV. The designation took place in 1999 when 291.2 Ac of bottomland forest adjacent to Silver Creek and north of I-64 were purchased by St. Clair County. In conjunction with the designation, a wetland mitigation and monitoring plan was associated with the original permit authorized by USACE February 1993, modified in November 1993 and March 1995. The remainder of the parcel is proposed for placement into a conservation easement and use as mitigation for this project. Because USACE requires mitigation at a 4:1 ratio, 52.8 Credits would be available from those remaining 210 Ac. Credits totaling 2.86 will be purchased from Shepgarten Mitigation Bank and 7.47 will be purchased from Silver Banks Mitigation Bank. The total mitigation credits proposed is 144.13.

Only areas which have been determined to be existing and soon to be existing safety hazards will be cleared. A Vegetation Management Plan and a Stream Erosion and Degradation Management Plan were submitted as part of the application documents. The plan includes full descriptions of Best Management Practices (BMPs) for stormwater management and water quality.

The land that is to be used for the wetland mitigation would require monitoring for five years. Monitoring would not be required for the credits which were purchased from the Silver Banks and those to be purchased from Shepgarten Bank. The 291.2-acre tract, owned by St. Clair County, could not be used for flood mitigation, per the USACE, as that could change the condition of that land. However, recreation use within the property is possible, as long as certain conditions are met (i.e., no tree clearing, no asphalt/concrete placement).

Purpose and Social & Economic Benefits of the Proposed Activity.

The project purpose is to provide a safe surrounding environment for aircraft as they approach and depart BLV by removing trees identified as existing and future obstructions to various airspace

protection zones. This would protect the airspace around the BLV and improve the safety of BLV approaches and operations.

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

Under a no-action alternative, the wetland habitat within the project area would remain in their current condition and all functions and values would be retained. However, this alternative would allow for all existing and future tree obstructions to remain in place and the project purpose and need would not be met. On site avoidance measures are not practicable and alternatives to address the project purpose are geographically limited. Additionally, off-site alternatives do not exist due to the nature of the current problem. Because of these reasons, the proposed project was determined to be the preferred as well as the least environmentally damaging practicable alternative (LEDPA).

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

A bat habitat assessment was submitted to the USFWS. After reviewing the assessment, the current status of the Indiana bat and the Northern Long-eared bat, the environmental baseline for the action area, the effects of the Proposed Action, the mitigation methods to be utilized, and the cumulative effects, it was determined that the action, as proposed, is not likely to adversely affect or jeopardize the continued existence of Federal and State-listed bat species. The results of the Section 7 consultation with USFWS determined the Proposed Action would have No Effect on other ESA-listed species or designated critical habitat.

An EcoCAT consultation (Project # 2408621) was initiated on January 5, 2024. The Illinois Natural Heritage Database shows the following protected resources may be in the vicinity of the project location:

State Threatened or Endangered Species

Indiana Bat (*Myotis sodalis*)

Northern Long-eared Bat (*Myotis septentrionalis*)

Squirting Cucumber (*Melothria pendula*)

Due to the scope of the project and proximity to protected resources the Department has made the following recommendations:

Indiana Bat & Northern Long-eared Bat

“This project is in the vicinity of records for the State-listed Indiana bat and northern long-eared bat. Due to the potential presence of the species on the project site, the Department recommends any tree removal occurs between November 1st and March 31st when bats are likely hibernating off site. If these

dates cannot be accommodated, a field visit should be performed by a qualified individual (biologist, forester, or others who have been trained accordingly) to determine if suitable trees are present to provide habitat. If suitable habitat trees are found within the project area, they should be clearly flagged and/or marked and shall not be cut between April 1st –October 31st when the bats are most likely to be present. Suitable habitat trees are defined as trees >5 inches diameter breast height (dbh), with exfoliating bark and other features potentially utilized by roosting bats. All non-suitable trees may be cut at any time.”

Squirting Cucumber

“The state-listed plant, squirting cucumber may occur in the project area and could be impacted during tree removal. The Department recommends the plant be searched for, flagged, and avoided if possible. If avoidance is not possible, please consider seed collection and planting, translocation, and surface soil conservation measures to help promote the continued existence of this plant in the area. Pursuant to the Illinois Endangered Species Protection Act [520 ILCS 10/], state-listed plants belong to the landowner and their fate resides with the landowner’s conservation decisions. Express written permission from the landowner should be obtained from construction companies/crews to take listed plants to comply with the Illinois Endangered Species Protection Act.”

IDNR has determined that if the above recommendations are adopted, that impacts to the state-listed species are unlikely.

The Department also offers the following conservation measures be considered to help protect native wildlife and enhance natural areas in the project area:

“If erosion control blanket is to be used, the Department recommends that wildlife-friendly plastic-free blanket be used around wetlands and adjacent to natural areas, if not feasible to implement project wide, to prevent the entanglement of native wildlife.”

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 this assessment was written. We tentatively find that the proposed activity would result in the attainment of water quality standards; 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 would benefit the area by protecting the airspace around the BLV and ensuring a safe environment for aircraft. Comments received during the 401 Water Quality Certification public notice period will be evaluated before a final decision is made by the Agency.