

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

1021 North Grand Avenue East, 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, April 15, 2022

Public Notice Ending Date:

Friday, April 29, 2022

Agency Log No.:C-0059-22

Federal Permit Information: This civil works project is under the jurisdiction of St. Louis District, Regulatory Branch U.S. Army Corps of Engineers

Name and Address of Discharger: St. Clair County Transit District, Ken Sharkey - 27 North Illinois Street, Belleville, IL 62220

Discharge Location: In Section 2 of Township 1-North and Range 7-West of the West 3rd Principal Meridian in St. Clair County. Additional project location information includes the following: East of IL - 158, South of Wherry Road, Southwest of I-64, West of IL-4, Shiloh, IL 62225

Name of Receiving Water: Silver Creek, Silver Creek Ditch, Unnamed tributary to Silver Creek, and Wetlands.

Project Description: St. Clair County Transit District/Bi-State Development propose to extend the existing MetroLink light rail transit line in St. Clair County, IL from its current terminus at Shiloh-Scott Station to the MidAmerica St. Louis Airport. The project will also include an adjacent public access road and a multi-use path.

Construction Schedule: Beginning June 2022 and ending April 2025

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.

Name: Francisco Herrera

Email: Francisco.Herrera@Illinois.gov

Phone: 217/782-3362

Post Document. No. C-0059-22-04152022-PublicNoticeAndFactSheet.pdf

St. Clair County Transit District (“Applicant”) has applied for a 401 Water Quality Certification for impacts associated with the extension of the existing MetroLink light rail transit (LRT) line in St. Clair County, Illinois. The project will involve extending the line from its current terminus at Shiloh-Scott Station (Scott Air Force Base) to the MidAmerica St. Louis Airport (Mascoutah, IL). The project will also include an adjacent public access road and a multi-use path. The proposed project site is located in Township 13 North, Range 7 West, Section 28, in St. Clair County, Illinois. The project will involve installation of Crossings 1 – 5 across jurisdictional waters that will be covered under either a Nationwide Permit, or a General Permit and includes the proposed double track section extending from Shiloh-Scott Station to the Rieder Road area. Crossing 6 impacts will occur in the single track area from the Rieder Road area to MidAmerica St. Louis Airport and will require an individual permit. This antidegradation assessment addresses the individual permit. The single track section of the proposed action (Rieder Road Area to MidAmerica St. Louis Airport) includes a single set of LRT rail tracks, a multi-use path, and an access road, proposes to construct bridges over Silver Creek and Little Silver Creek, as well as culvert several jurisdictional waters and add fill so the single track section may cross a portion of the jurisdictional pond near I-64 at the MidAmerica St. Louis Airport. Crossing 6 will result in 22.249 acres (Ac.) of wetland impacts, 576 linear feet (LF) or 0.293 Ac. of stream impacts, and 5.661 Ac of impacts to one open water feature. Permanent impacts will be a result of a combination of rock fill, earthen fill, and tree clearing/wetland conversion. Temporary impacts will consist of the installation of cofferdams in order to install bridge piers and downstream sediment impacts as a result of construction.

Wetland impacts will be mitigated at a ratio of 3:1 for Palustrine Forested (PFO) wetlands, 1:1 for Palustrine Emergent (PEM) wetlands and 1.5:1 for forested wetland conversion for a total of 48.876 mitigation credits. Stream impacts will be mitigated at a 4:1 ratio for a total of 2532 stream mitigation credits. These credits will be purchased from the Silver Banks Mitigation Bank.

Information used in this review was obtained from the application documents dated March 2022, March 2, 2022, January 21, 2022, and August 26, 2021.

Identification and Characterization of the Affected Water Body.

Silver Creek (reaches STR-07 and STR-09) has 1.8 cfs of flow during critical 7Q10 low-flow conditions. Silver Creek is classified as General Use Water. Silver Creek is not listed as a biologically significant stream in the 2008 Illinois Department of Natural Resources Publication *Integrating Multiple Taxa in a Biological Stream Rating System*, however, at this location it is given an integrity rating of “C” in that document. Silver Creek, Waterbody Segment IL_OD-07, is not listed on the 2018 Illinois Integrated Water Quality Report and Section 303(d) List. Aquatic life and aesthetic quality uses are fully supported. This Segment of Silver Creek is subject to enhanced dissolved oxygen standards.

Silver Creek Ditch (STR-06) has 1.8 cfs of flow during critical 7Q10 low-flow conditions. Silver Creek Ditch is classified as General Use Water. Little Silver Creek is not listed as a biologically significant stream in the 2008 Illinois Department of Natural Resources Publication *Integrating Multiple Taxa in a Biological Stream Rating System*; however, it is given an integrity rating of “C” in that document. Silver Creek Ditch, Waterbody Segment IL_ODF-OF-C1, is not listed on the 2018 Illinois Integrated Water Quality Report and Section 303(d) List. Aquatic life use is fully supported. This Segment of Silver Creek Ditch is not subject to enhanced dissolved oxygen standards.

The unnamed tributary to Silver Creek (STR-05) has 0 cfs of flow during critical 7Q10 low-flow conditions. The unnamed tributary to Silver Creek is classified as General Use Water. The unnamed tributary to Silver Creek is not listed as a biologically significant stream in the 2008 Illinois Department of Natural Resources Publication *Integrating Multiple Taxa in a Biological Stream Rating System*, nor is it given an integrity rating in that document. The unnamed tributary to Silver Creek, tributary to Waterbody Segment IL_OD-07, is not listed on the 2018 Illinois Integrated Water Quality Report and Section 303(d) List as it has not been assessed. This Segment of the unnamed tributary to Silver Creek is not subject to enhanced dissolved oxygen standards.

The USGS Illinois StreamStats basin characteristics program gives a watershed size of 0.36 square miles for the unnamed tributary of Silver Creek. According to the Illinois State Water Survey, the unnamed tributary of Silver Creek in the area of the proposed development, discharge is likely to be 7Q1.1 zero flow streams. In this region of Illinois, 7Q1.1 zero flow streams are streams with a watershed area of 3 square miles or less. These streams will exhibit no flow for at least a continuous seven-day period nine out of ten years. Aquatic life communities in these headwater streams are tolerant of the effects of drying. Depending on the rainfall received before biological surveys, either a very limited aquatic life community, or no community at all would be found. Given this flow regime, no additional biological characterization is required.

A wetland and stream delineation was conducted on January 21, 2022 for the approximately 479-acre survey area and identified 115.989 acres of aquatic resources. The resources delineated included 13 wetlands (WTL-01 to WTL-13) comprising a total of 80.532 acres, 11 streams (STR-01 to STR-11) comprising a total of 11.564 acres, 21 ditches and other like drainage features (EDF-01 to 19, IDF-01 and ER-01) comprising a total of 1.749 acres, and 3 open water features (OWF-01 to OWF-02) comprising a total of 22.144 acres.

Jurisdictional wetlands in the Crossing 6 project area are outlined in the table below :

Wetland ID		Cowardin Classification	FQI	Mean C	Size in Project Area (Ac.)	Area Impacted (Ac.)
WTL-04	a	PFO	4.02	1.8	0.147	0.147
	b	PFO	4.5	2.25	7.439	0.789
	c	PEM	3.46	2	0.245	0.245
WTL-05	a	PFO	3.67	1.5	0.931	0.714
	b	PFO	4.02	1.8	9.121	3.932
	c	PEM	4.92	2.2	1.684	1.588
WTL-06	a	PFO	4.08	1.67	0.872	0.572
	b	PFO	2.5	1.25	11.835	4.327
	c	PEM	0	0	1.819	1.617
WTL-07	a	PFO	4.08	1.68	0.455	0.35
	b	PFO	5.37	2.4	1.994	1.35
	e	PEM	0	0	0.525	0.476
WTL-08		PFO	5	2.5	1.951	0.111
WTL-10		PEM	8.66	5	1.935	0.864
WTL-13		PEM	0	0	1.15	1.081
			Total		42.103	18.163

Of the 11.564 acres of jurisdictional streams in the project site, only STR-05, STR-06, STR-07 and STR-09 (9.948 Ac) are in the Crossing 6 project area. These 4 stream reaches include Silver Creek (STR-07 and STR-09), Silver Creek Ditch (STR-06) and an unnamed tributary to Silver Creek (STR-05).

STR-05 is a perennial stream that flows generally southeast through the survey area. This stream intersects WTL-04 and WTL-05 and has a primarily forested riparian corridor. STR-05 appears to have a significant connection to downstream TNWs, and therefore considered jurisdictional.

STR-06 is identified as a perennial stream flowing generally southwest through the survey area and intersects several wetland complexes within the Silver Creek floodplain. Stream corridors are primarily forested, and stream banks are steeply sloped with a sediment substrate. Reinforced rock armoring was observed at several locations along the stream banks. Flowing water was observed within the stream at the time of the site visit and was found to contribute hydrology to the adjacent wetlands.

STR-07 is identified as a perennial stream flowing generally southwest through the survey area and intersects several wetland complexes within the Silver Creek floodplain. Stream corridors are primarily forested, and stream banks are steeply sloped with a sediment substrate. Reinforced rock armoring was observed at several locations along the stream banks. Flowing water was observed within the stream at the time of the site visit and was found to contribute hydrology to the adjacent wetlands.

STR-09 is identified as a perennial stream existing as an extant reach of the historical Silver Creek channel. This reach appears to receive surface water flow from a linear wetland (WTL-10) located to the east and has a significant connection with downstream TNWs.

There were three open water features identified in the survey area of which only OWF-03 was determined to be jurisdictional waters. OWF-03 is classified as Lacustrine Unconsolidated Bottom (L1UB). The total size of OWF-03 is 21.205 acres and appears to have been excavated within STR-10 with the construction of Interstate 64. Surface water flow does not appear to have been completely severed with flow continuing south through the lake toward an unnamed tributary of Silver Creek. During construction of MidAmerica Airport in 1997, surface flow out of the lake appears to have been relocated to the northwest via a constructed drainage swale (WTL-10). During the survey, OWF-03 was observed contributing surface water flow to WTL-10, which contributes surface water flow to STR-09. OWF-03 appears to be an impoundment of a jurisdictional water and appears to have a significant connection to downstream TNWs, therefore considered to be jurisdictional waters.

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, a normal and unavoidable result of construction of the rail, bike trail and access road extension, may occur as a result of placement of temporary causeways, pier construction and dredging. Permanent fill will be discharged to 18.163 Ac of wetland (166,795 Cubic Yards), 0.293 Ac of stream (2291 Cubic Yards) and 5.661 Ac of open water (29,800 Cubic Yards). Fill material in the Crossing 6 project area will consist of 0.247 Ac of culvert placement fill impacts, 0.087 Ac of bridge piers/abutments fill impacts, and 18.122 Ac earthen fill. Filling of the pond will be a combination of rock and soil fill to 5.661 Ac of open water to construct a raised embankment for the LRT line. Sediment impacts to downstream water resources during construction are expected to be temporary. Culverts that will be used will consist of concrete box culverts and concrete pipe culverts that will vary in size and have stabilized inlets and outfalls consisting of riprap. Bedding and backfill for culverts will consist of porous granular material. Temporary cofferdams will be installed for bridge pier construction. Dredging will be employed to remove silt and sediment deposits prior to the placement of rock fill and is expected to yield approximately 14,266 CY of soil.

Construction runoff may temporarily increase sediment loading to streams in the proposed action area. However, most of the suspended solids would settle out a short distance downstream of construction areas, especially in pools where stream velocity is reduced. It is expected that impacts to aquatic organisms will only be detectable in areas of in-stream activities and for short sections downstream. The increased suspended solids, sedimentation and water chemistry alterations will be short term and recolonization of affected stream reach by benthic invertebrates and fish will be relatively rapid as long as measures to minimized sedimentation area followed.

Fate and Effect of Parameters Proposed for Increased Loading.

The increase in total suspended solids in STR-06 and STR-07 would be local and temporary and existing riverbed habitat would be disturbed by construction activities. Minor impacts from bridge caissons/foundations are expected. Permanent impacts from wetland, stream and open water feature fill is expected during this project. Construction staging areas will require grading and some fill, however, the staging areas are expected to revert back to their pre-project uses following construction of the extension project. Dredged material may be stored in upland areas where no contact to jurisdictional waters will occur. Water quality impacts during construction and operational activities will be minimized using erosion and siltation barriers, and construction activities in sensitive aquatic areas will be conducted during dry periods to reduce the impacts of sedimentation in these areas. Dewatering activities of cofferdams will also incorporate BMPs. Siltation barriers will be employed to prevent erosion and other materials from entering the creeks, and ground cover will be applied to disturbed soil areas. On-site drainage features will be incorporated into the design of the proposed facilities. These measures include diverting track bed runoff through vegetated ditches to collect sediment before discharging to receiving streams and wetlands. Additional measures to mitigate runoff increases, stream flow, erosion, and sedimentation include collecting runoff from disturbed areas in drainage ditches, using runoff-retarding devices to reduce erosion and flow velocity; containing temporary stockpiles of spoil material to minimize erosion; and restoring disturbed areas to the desired topography as soon as possible.

The permanent discharge of dredged or fill material to jurisdictional streams and wetlands will be mitigated through the purchase of wetland and stream credits from an approved mitigation bank. Forested wetland fills will be mitigated at a ratio of 3:1, emergent wetland fills will be mitigated at a ratio of 1:1, and the conversion of forested wetland to emergent wetland due to tree clearing but no fill additions will be mitigated at a ratio of 1.5:1. Permanent fill will be discharged to approximately 12.292 acres of forested wetland and 5.871 acres of emergent wetland (18.163 acres total). Conversion of forested wetland to emergent wetland will impact approximately 4.086 acres of wetland. Mitigation requirements to offset impacts to these 22.249 acres of wetland is anticipated to be 48.876 wetland credits. Mitigation for fill of streams will be mitigated at a rate in excess of 4:1. Stream mitigation ratios were determined through use of USACE's "Illinois Stream Mitigation Guidance", Version 1.0 dated March 2010. Approximately 576 linear feet (0.293 acres) of streams are anticipated to be permanently filled as a result of the proposed action. Mitigation requirements to offset impacts to streams is anticipated to be 2,532 stream credits.

Impacted Feature	Impact Type	Impact Area (Ac or LF)	Mitigation Ratio	Mitigation Credits Required
Emergent Wetland	Filled	5.871 Ac	1:1	5.871
Forested Wetland	Filled	12.292 Ac	3:1	36.876
Forested Wetland	Conversion	4.086 Ac	1.5:1	6.129
			Total	48.876
Perennial Stream	Filled	576 LF	4:1	2304
			Total	2532 (proposed)

Purpose and Social & Economic Benefits of the Proposed Activity.

This project will extend the existing Metrolink LRT line from its existing terminus at Shiloh-Scott Station to the MidAmerica St. Louis Airport. The proposed action is needed to support the growing MidAmerica St. Louis Airport and complement adjacent existing and planned land development. The airport is home to several aviation-related or aviation-dependent businesses that would be served by the LRT extension. Additionally, the Metrolink LRT can provide more passengers per trip than the current shuttle service and provides a broader range of availability to the airport for employees. The Metrolink Red Line to Shiloh-Scott operated between 4:17 A.M. until 12:35 A.M. and would offer a wider and predictable schedule that would make transit a more viable option to access the airport and its surrounding developments.

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

The applicant has analyzed several build alternatives for this project. The following will discuss only the single-track portion of the build alternative (from the Rieder Road area to a new LRT station at MidAmerica St. Louis Airport). Some of the alternatives were assessed in a Runway Protection Zone (RPZ) Alternatives Analysis (AA) completed for the Metrolink Extension in 2021 and is included in the application documents. This analysis looked at alternatives to avoid the RPZ of Runway 14L.

No Action Alternative. The single track section of the proposed action (Rieder Road Area to MidAmerica St. Louis Airport) includes a single set of LRT rail tracks, a multi-use path, and an access road, proposes to construct bridges over Silver Creek and Little Silver Creek, as well as culvert several jurisdictional waters and add fill so the single track section may cross a portion of the jurisdictional pond near I-64 at the MidAmerica St. Louis Airport. The single track section would only avoid jurisdictional waters impacts if it were not constructed. The No Action Alternative does not meet the Purpose and Need of the project, as it does not provide light rail transit or bicycle and pedestrian transportation modal choices to the MidAmerica St. Louis Airport.

Build Alternative 1. This alternative was from the 1999 EA for the prior expansion project and was the selected alternative then. However, this alternative does not include a multi-use path, or an access road. This alternative includes the light rail extension and associated facilities for a single track line from the

Rieder Road area to the MidAmerica St. Louis Airport. This alternative was not chosen as the preferred alternative as it fails to meet the purpose and need of the project as it does not provide a bicycle or pedestrian route to the airport. This alternative was also not considered in the RPZ AA.

Build Alternative 2. This alternative would put the proposed action partially in I-64 rights of way. This alternative includes a single track light rail from Rieder Road area to the MidAmerica St. Louis Airport. The two lane access road from Rieder Road to Airport Boulevard is included and a multi-use path aligns adjacent to the LRT extension from the existing MetroBikeLink terminus at Shiloh-Scott station to Airport Boulevard, north of the proposed MidAmerica St. Louis Airport LRT station. This was the least expensive alternative assessed in the RPZ AA, however, the I-64 right of way is needed for preservation for IDOT's operational, safety, and future planning needs. This alternative was not chosen as the preferred alternative.

Build Alternative 3 (Preferred Alternative). This alternative would have the proposed action slightly south of Build Alternative 2 to avoid rights-of-way associated with I-64 preserved for IDOT's operational, safety, and future planning needs. This alternative includes a single track light rail from Rieder Road area to the MidAmerica St. Louis Airport as well as a two-lane access road from Rieder Road to Airport boulevard. A multi-use path aligns adjacent to the LRT extension from the existing MetroBikeLink terminus at Shiloh-Scott station to Airport Boulevard, north of the proposed MidAmerica St. Louis Airport LRT station. This alternative was found to be a practicable alternative and was studied further. Build Alternative 3 was found to be the only alternative studied that was practicable and met the purpose and need of the project. Details and refinements to the design were completed after selection of the Preferred Alternative to fully incorporate select project components that are part of the proposed action. These components include construction requirements and staging areas, grading, power and substations, facilities, multi-use path and access road connections, culvert and drainage requirements, utility relocations, temporary easements, and an environmental buffer of 15' in most locations. Build Alternative 3 was developed after the RPZ AA analysis but has similar costs to Build Alternative 2. This was chosen as the Preferred Alternative.

Build Alternative 4. This alternative extends from Rieder Road to the projects eastern terminus and continues away from the airports 2010 Ultimate Runway 14L RPZ. The light rail extension and associated facilities include the extension of the single track line from Rieder Road area to a new LRT station at the airport. A two-lane access road will run from Rieder Road to Airport Boulevard, and a multi-use path aligns adjacent to the LRT extension from the existing MetroBikeLink terminus at Shiloh-Scott station to Airport Boulevard, north of the proposed MidAmerica St. Louis Airport LRT station. This alternative would require realigning of I-64 and acquisition of approximately 25 acres of new right-of-way for the portion of relocated I-64. Build Alternative 4 costs would be substantially higher (\$140 million more than Build Alternatives 2 and 3) due to the cost of realigning I-64. This alternative was found to be not practicable, and therefore not chosen as the preferred alternative.

Build Alternative 5. This alternative extends from Rieder Road to the projects eastern terminus while avoiding the Runway 14L RPZ by constructing the proposed action through a tunnel. The light rail extension and associated facilities include the extension of the single track line from Rieder Road area to a new LRT station at the airport. A two-lane access road will run from Rieder Road to Airport Boulevard, and a multi-use path aligns adjacent to the LRT extension from the existing MetroBikeLink terminus at Shiloh-Scott station to Airport Boulevard, north of the proposed MidAmerica St. Louis Airport LRT station. Additionally, a tunnel is proposed to contain the rail extension, access road, and multi-use path under Runway 14L RPZ. This alternative was determined to have a substantially higher cost due to the tunnel under the roadway. Because of the cost and that it was found not to be practicable, this alternative was not chosen as the preferred alternative.

Build Alternative 6. This alternative extends from Rieder Road to the projects eastern terminus while avoiding the Runway 14L RPZ by constructing the proposed action through a tunnel under the runway. The light rail extension and associated facilities include the extension of the single track line from Rieder Road area to a new LRT station at the airport. A two-lane access road will run from Rieder Road to Airport Boulevard, and a multi-use path aligns adjacent to the LRT extension from the existing MetroBikeLink terminus at Shiloh-Scott station to Airport Boulevard, north of the proposed MidAmerica St. Louis Airport LRT station. Additionally, a tunnel is proposed to contain the rail extension, access road and multi-use path under Runway 14L-32R. This alternative was determined to have a substantially higher cost due to a long tunnel under the runway (\$740 million more than Build Alternatives 2 and 3). A geotechnical analysis would be needed to verify the feasibility of a tunnel under the runway. Because of needed analysis and high cost, this alternative was not found to not be practicable and therefore was not chosen as the preferred alternative.

Build Alternative 7. This alternative extends from Rieder Road to the projects eastern terminus. A public access road would be added and as a result, shift the Metrolink LRT extension, access road, and bike path alignments across the Silver Creek floodplain, extending adjacent to Runway 14L-32R to circle the runway, and terminating at the proposed MidAmerica St. Louis Airport station. This alternative would require new intersections between the LRT alignment and existing railroads and would relocate or culvert additional streams north and south of Runway 14L-32R. The light rail extension and associated facilities include the extension of the single track line from Rieder Road area to a new LRT station at the airport. A two-lane access road will run from Rieder Road to Airport Boulevard, and a multi-use path aligns adjacent to the LRT extension from the existing MetroBikeLink terminus at Shiloh-Scott station to Airport Boulevard, north of the proposed MidAmerica St. Louis Airport LRT station. This alternative would have a substantially higher cost (\$240 million more than Build Alternatives 2 and 3) due to the longer rail line to extend around runways. This alternative would also have the highest water impacts of all the alternatives studied as the rail would follow Silver Creek and would relocate or culvert additional streams north and south of Runway 14L-32R. Because of cost, impact and need for new intersection construction, this alternative was found to not be practicable and therefore was not chosen as the preferred alternative.

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

An EcoCAT endangered species consultation was submitted on August 26, 2021 (Project #2203005) to the Illinois Department of Natural Resources. The consultation indicated records for the state and federally-listed northern long-eared bat (*Myotis septentrionalis*) and Indiana bat (*Myotis sodalis*) in the vicinity of the project area. If tree clearing is necessary, the Department recommends removing trees between November 1st and March 31st to avoid impacts to these species.

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

If temporary or permanent lighting is required, the Department recommends the following lighting recommendation to minimize adverse effects to wildlife:

- All lighting should be fully shielded fixtures that emit no light upward.
- Only “warm-white” or filtered LEDs (CCT < 3,000 K; S/P ratio < 1.2) should be used to minimize blue emission.
- Only light the exact space with the amount (lumens) needed to meet industry safety requirement.
- If LEDs are to be used, avoid the temptation to over-light based on the higher luminous efficiency of LEDs.

If erosion control blanket is to be used, the Department also 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.

The Department also suggest all disturbed areas be reseeded with an appropriate native seed mix that contains forbs as well as grasses where feasible.

A Consultation submitted on January 25, 2022 (Project #2208848) resulted in a consultation termination. However, if tree clearing is necessary, the Department recommends removing suitable habitat trees between November 1st and March 31st to avoid impacts to the state-listed Indiana and northern long-eared bats. This consultation was submitted as a request for only the Ameren corridor.

A Bat Habitat Assessment was conducted on January 31, 2022, in order to identify and mark suitable habitat trees. As recommended by IDNR, suitable habitat trees will only be removed between November 1st and March 31st.

A Section 7 desktop consultation was conducted in order to determine whether any federal or state listed species or habitat are likely to be adversely impacted by the project. It was determined that the following federal and state listed species may occur within the boundary of the proposed project: decurrent false aster, Indiana bat, northern long-eared bat, Illinois cave amphipod and monarch butterfly (candidate species). A review of T & E species potentially present in the corridor per the desktop review, USFWS and IDNR coordination, and the field survey is as follows:

- Decurrent False Aster (*Boltonia decurrens*) - No habitat for the decurrent false aster is assumed to be present within the project area, based on the species habitat descriptions and requirements, and its location outside of the Illinois River floodplain. As such, the proposed action is anticipated to have *no effect* on this species.
- Indiana Bat (*Myotis sodalis*) - It is assumed that Indiana bats are present within the project corridor due to known captures nearby and the presence of suitable habitat within the corridor. Disturbance to individuals will be avoided by completing tree clearing activities during the November 1st and April 1st restriction period, when the species is typically at their winter hibernacula, and away from the project area. St. Clair County will further offset impacts to Indiana bat habitat by providing compensatory mitigation via purchasing of wetland and stream mitigation credits. Based on these conclusions, the proposed action *may affect, but is not likely to adversely affect, this species*.
- Northern Long-eared Bat (*Myotis septentrionalis*) - It is assumed that Northern Long-eared bats are present within the project corridor due to known occurrence records nearby and the presence of suitable habitat within the corridor. Disturbance to individuals will be avoided by completing tree clearing activities during the November 1st and April 1st restriction period, when the species is typically at their winter hibernacula. The project proponent is proposing to further offset impacts to Northern Long-eared bat habitat by providing compensatory mitigation via purchasing of wetland and stream mitigation credits. Based on these conclusions, the proposed action *may affect, but is not likely to adversely affect, this species*.
- Illinois Cave Amphipod (*Gammarus acherondytes*) - The Illinois cave amphipod is only known to inhabit three caves within 10 miles of Waterloo, Illinois, all of which are located in Monroe County. Based on our understanding of this species habitat requirements and known presence outside of St. Clair County, the proposed action is anticipated to have *no effect* on this species.

- Monarch Butterfly (*Danaus plexippus*) - The monarch is a candidate species and not yet listed or proposed for listing. There are generally no Section 7 requirements for candidate species. However, any opportunity to conserve the species is encouraged. The Monarch is known to inhabit Illinois. Additionally, the species preferred host plant, milkweed, was observed within the project corridor. The project corridor will be graded, which may disturb the perennial milkweed seedbank. However, once construction is completed, vegetation restoration efforts will include an area of replanting that uses native herbaceous plants that typically include milkweed species. This could attract Monarchs to the area and provide essential habitat for their reproductive cycle. It is anticipated that approximately 1% of the contractor's total restoration planting will be native seed, which is intended to support Monarch butterfly habitat and conservation efforts. This planting is proposed to be installed near the Shiloh-Scott Station, at an exact location to be determined by the contractor. Based on the limited amount of impact and appropriate restoration measures, the proposed action *may affect, but is not likely to adversely affect the species*.
- Bald and Golden Eagles (*Haliaeetus leucocephalus/Aquila chrysaetos*) - No eagle nests were observed during the field walkover; therefore, it is assumed that bald and golden eagle species are not present within the preferred alternative. As such, the proposed action is anticipated to have *no effect* on these species.

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 community by providing support to the growing MidAmerica St. Louis Airport and complement adjacent existing and planned land development with installation of access roads, and extension of the MetroLink Light Rail and multi-use trail. Comments received during the 401 Water Quality Certification public notice period will be evaluated before a final decision is made by the Agency.