

# Appendix I

## Section 4(f) Correspondence

I-290 Eisenhower Expressway  
Cook County, Illinois

Since the publication of the DEIS, Appendix I was updated to include the following:

- Changed title from Columbus Park Correspondence to Section 4(f) Correspondence;
- Added letters of concurrence from Chicago Park District, Village of Forest Park and Park District of Forest Park; and
- Added SHPO Section 4(f) exception concurrence letter.

*Prepared For:*

Illinois Department of Transportation

*Prepared By:*

WSP USA

June 2017

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**chicago park district**

Administration Office  
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Chicago, Illinois 60611  
(312) 742-PLAY (7529)  
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City of Chicago  
Rahm Emanuel  
*Mayor*

Oct. 8, 2015

Pete Harmet  
IDOT  
201 W. Center Ct.  
Schaumburg, IL. 60196

Dear Mr. Harmet:

I am writing as a follow up to the meeting we had with representatives of IDOT and members of our staff at the Planning and Construction Department at the Chicago Park District on August 19, 2015 regarding Columbus Park and the I-290 Project.

Based upon the information provided at the meeting, the CPD has determined that the I-290 project would have no adverse effect upon Columbus Park. The CPD supports the multi-use trail connection at Austin Boulevard, and concurs with a temporary easement to construct the path, which would be donated to IDOT.

Further coordination, especially with respect to the path alignment and landscaping, is needed prior to finalizing the actual design in this area of the park. The CPD desires enhanced landscaping along south edge of the property, and would donate a temporary easement to IDOT to accomplish this work. Further coordination is needed, especially with IHPA, prior to finalizing a landscaping plan.

We all agree that this project will not result in an adverse effect and also believe that there is an opportunity to enhance the park's historic integrity that should not be missed. We would like the scope of work to include new berms with tree and shrub plantings along the south perimeter of the park. We hope that the project can also address drainage issues at the park's southeast corner. We are open to working with your team to develop an appropriate plaza treatment at the southwestern edge of the park. We think these improvements will be especially beneficial to pedestrians and bicyclists using the trail along the southern part of the park.

I have discussed this proposal with Rachel Leibowitz of the IHPA and she concurs that if designed well, this work would enhance the historic integrity of the park. She is willing to consult with the team and the project moves into a design phase. Thank you for your consideration on this matter.

Sincerely,

Julia S. Bachrach  
Planning Supervisor/ Historian

cc: Rob Rejman, CPD  
Rachel Leibowitz, IHPA



# Illinois Department of Transportation

Office of Highways Project Implementation / Region 1 / District 1  
201 West Center Court / Schaumburg, Illinois 60196-1096

February 27, 2017

The Honorable Anthony T. Calderone  
Mayor  
Village of Forest Park  
517 Des Plaines Avenue  
Forest Park, IL 60130

Dear Mayor Calderone:

The purpose of this letter is to request concurrence from the Village of Forest Park (Village) with respect to proposed I-290 construction activities affecting two parks located within the Village limits. As discussed at the meetings on October 15, 2015, January 21, 2016 and October 27, 2016 (meeting minutes attached) we have prepared and released an Environmental Impact Statement for the reconstruction of I-290 from west of Mannheim Road to Racine Avenue. The proposed scope of work on I-290 in the Forest Park area includes complete reconstruction of the expressway including the replacement of the bridge carrying Circle Avenue over I-290.

In the vicinity of I-290, the Village has parks and other recreational uses located at Circle Avenue on property that was purchased by Cook County for the original construction of I-290 and associated cross-streets and frontage roads. It is our understanding that the Village has been leasing these properties from the County. However, based upon coordination with the County and the Village, no lease agreements have been found to date.

The attached exhibits provide information on the I-290 improvements relative to Veterans Park and the Dog Park located on either side of Circle Avenue at Lehmer Street. In particular, reconstruction of Circle Avenue over I-290 will require permanent use and temporary construction easements for the widening of the Circle Avenue bridge and approaches to include wider sidewalks, 6' wide bicycle paths and a wider pavement area for a transit kiss and ride. These elements of the project were requested by the Village and/or the CTA in order to improve mobility across the bridge and accessibility to the transit station. The Department is utilizing retaining walls to contain fill areas and prevent further intrusion into the parks. However, some encroachment is necessary to fully implement these features. Temporary construction easements are also needed to allow for working space during construction.

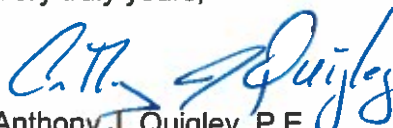
Although the parks are situated on County property obtained for the original I-290 construction, they are protected by Section 4(f) of the U.S. Department of Transportation Act of 1966 due to their recreational use. Based upon the coordination with the Village thus far, the I-290 project will not adversely affect the activities, features, or attributes of these properties. As a result, IDOT intends to seek a "de minimis" impact finding from the Federal Highway Administration based on this project not adversely affecting the features, attributes, or activities qualifying this property for protection under Section 4(f). In this regard, we are requesting written concurrence from the Village that the proposed improvements will not adversely affect the recreational activities, features and attributes of Veterans Park and the Dog Park.

The work to be performed in the parks, as described herein, was presented during the I-290 Public Hearings on January 25, 2017 at the Proviso Math and Science Academy in Forest Park, and on January 26, 2017 at the Marriott Hotel-Medical District in Chicago. No comments were received at the public hearings regarding adverse effects to the activities, features, or attributes at either of the two parks as a result of the I-290 Project, although the US Department of the Interior (DOI) submitted correspondence which is attached for your reference. The Department will be coordinating with the DOI in the near future to discuss their comments.

If the Village agrees with the "de minimis" finding for the parks, please indicate your concurrence in the space provided below and return one copy to this office in the enclosed stamped, self-addressed envelope. With Village concurrence, the FHWA would issue a "de minimis" impact finding for the project as part of the Final Environmental Impact Statement/Record of Decision.

If you have any questions or need additional information, please contact me or Pete Harmet, Bureau Chief of Programming, at (847) 705-4393.

Very truly yours,

  
Anthony J. Quigley, P.E.  
Region One Engineer

Enclosures

Project and Environmental Studies  
I-290 West of Mannheim Road to Racine Avenue  
Cook County

Concur:



Do Not Concur: \_\_\_\_\_

Title: \_\_\_\_\_

MAYOR

Date: \_\_\_\_\_

5-18-17

Comments:

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# Illinois Department of Transportation

Office of Highways Project Implementation / Region 1 / District 1  
201 West Center Court / Schaumburg, Illinois 60196-1096

March 13, 2017

Mr. Larry Piekarz  
Executive Director  
Park District of Forest Park  
7501 Harrison Street  
Forest Park, IL 60130

Dear Mr. Piekarz:

The purpose of this letter is to request concurrence from the Park District of Forest Park (Park District) with respect to proposed I-290 construction activities affecting proposed park improvements on Park District property. As discussed at our October 27, 2016 meeting (minutes attached) we have prepared a Draft Environmental Impact Statement (DEIS) for the reconstruction of I-290 from west of Mannheim Road to Racine Avenue. The proposed scope of work on I-290 includes complete reconstruction of the I-290 expressway including replacement of the bridge carrying Circle Avenue over I-290.

The attached exhibit provides information on the I-290 improvements relative to the Park District property located along the west side of Circle Avenue between I-290 and Harrison Street. In particular, the Circle Avenue bridge and approach roadways will be widened to accommodate wider sidewalks and bike paths as requested by the Village. Although the Department is utilizing retaining walls to contain roadway fill areas and prevent intrusion into the park, a temporary easement is needed along Park District property (the Roos property) to allow for working space during construction. Once construction is completed, the Department will vacate the easement and restore the Park District property to its previous condition.

As you know, Park District property is protected by Section 4(f) of the U.S. Department of Transportation Act of 1966 due to its recreational use. Based upon the coordination with the District thus far, the I-290 project will not adversely affect use of this property. As a result, IDOT intends to seek a "de minimis" impact finding from the Federal Highway Administration based on this project not adversely affecting the activities, features, or attributes qualifying this property for protection under Section 4(f). In this regard, we are requesting written concurrence from the Park District that the proposed temporary easement will not adversely affect the recreational activities, features, or attributes of the Park District Property. With Park District concurrence, the FHWA would issue a "de minimis" impact finding for the project as part of the Final EIS/Record of Decision.

Mr. Larry Piekarz  
March 13, 2017  
Page 2

If the Park District agrees with the "de minimis" finding as described, please indicate your concurrence in the space provided below and return one copy to this office in the enclosed stamped, self-addressed envelope by March 31, 2017 in order to maintain the project schedule. The work to be performed in the parks as described herein was presented during the Public Hearings on January 25, 2017 and January 26, 2017 at the Proviso Math and Science Academy in Forest Park and the Chicago Marriott Hotel - Medical District in Chicago. No comments were received at the public hearings regarding adverse effects to the activities, features, or attributes at this park as a result of the I-290 project, although the US Department of the Interior (DOI) submitted general comments which are attached for your reference. The Department will be coordinating with the DOI in the near future to discuss their comments.

If you have any questions or need additional information, please contact me or Pete Harmet, Bureau Chief of Programming, at (847) 705-4393.

Very truly yours,

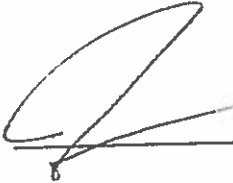
  
Anthony J. Quigley, P.E.  
Region One Engineer

Enclosures

cc: Tim Gillian, Village of Forest Park

Mr. Larry Piekarz  
March 13, 2017  
Page 3

Project and Environmental Studies  
I-290 West of Mannheim Road to Racine Avenue  
Cook County

Concur  \_\_\_\_\_

Do Not Concur \_\_\_\_\_

Title: Park Board President

Date: 6-1-17

Comments:

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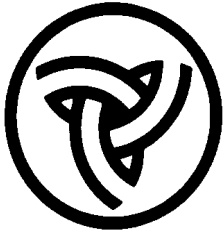
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BUREAU OF PROGRAMMING  
RECEIVED  
JUN 08 2017  
DISTRICT #1



# Illinois Department of Transportation

## Memorandum

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To: John Fortmann                      Attn: Pete Harmet  
From: Maureen Addis                      By: Brad Koldehoff  
Subject: Cultural Resource Concurrence  
Date: May 30, 2017

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**Cook County  
Chicago  
I-290 (Eisenhower Expressway)  
Interstate Reconstruction, Widening  
Job # P-91-201-00  
IDOT Seq. # 9274, A-F**

Attached is a letter of the Illinois State Historic Preservation Officer (SHPO) supporting a finding that the construction activities within Columbus Park, which is a National Historic Landmark, will enhance the property and therefore qualifies as an exception for Section 4(f) approval.

This completes the necessary coordination for evaluating potential impacts to significant cultural resources for this project.

Attachment

BK:el



# Illinois Department of Transportation

2300 South Dirksen Parkway / Springfield, Illinois / 62764

**RECEIVED**  
MAY 26 2017

**Preservation Services**

May 26, 2017

**Cook County  
Chicago  
I-290 (Eisenhower Expressway)  
Interstate Reconstruction, Widening  
Job # P-91-201-00  
IDOT Sequence #9274 A-F  
IHPA Log #004112410, 010052815**

**IHPA REVIEW**  
H/A \_\_\_\_\_  
AC \_\_\_\_\_  
AR \_\_\_\_\_  
File CKI IDOT

***RE: Section 4(f) Exception***

Dr. Rachel Leibowitz  
Deputy State Historic Preservation Officer  
Illinois Historic Preservation Agency  
1 Old State Capitol Plaza  
Springfield, IL 62701

Dear Dr. Leibowitz:

In further consultation with your office, the Illinois Department of Transportation (IDOT) in coordination with the Federal Highway Administration (FHWA) is currently performing preliminary engineering and environmental studies for the planned improvement of I-290 from Mannheim Road to Racine Avenue. Your office concurred June 25, 2017 with the IDOT finding that the undertaking will have no adverse effect on Columbus Park or other historic properties (letter attached). The undertaking is not currently included in IDOT's FY 2017-2022 Proposed Highway Improvement Program. At this time only Phase I (planning) is funded. The undertaking, however, does represent a high priority for future funding consideration.

The purpose of this letter is to request your concurrence that the construction activities within Columbus Park, a National Historic Landmark, would enhance the property and would therefore qualify as an exception for Section 4(f) approval. As an historic property, the State Historic Preservation Officer (SHPO) is considered an "official with jurisdiction" over Columbus Park and to apply the exception to Section 4(f), we must obtain your agreement that the exception criteria have been satisfied.

The proposed improvement is anticipated to include an additional lane west of Austin Boulevard and conversion of an existing lane in each direction to a managed lane east of Austin Boulevard. The HOT 3+ managed lane alternative was identified as the preferred alternative in the Draft Environmental Impact Statement (DEIS). The preferred alternative stays primarily within existing right-of-way and only a minor amount of new right-of-way is needed near several

interchanges. No permanent right-of-way is required from Columbus Park, and no displacements are required in the corridor.

IDOT developed an east-west shared-use path concept that would be constructed as part of the I-290 improvements. The path would provide connectivity from the Illinois Prairie Path on the west to Columbus Park on the east. The path connection from Austin Boulevard to the existing Columbus Park Trail System would be constructed with the understanding that the Chicago Park District approved the connection and donated a temporary easement for construction of the connection. During coordination with the Chicago Park District, additional trail improvements were requested at the east end of Columbus Park to capitalize on the proximity of project-related construction activities, materials, and equipment.

As discussed in a meeting with the Chicago Park District on November 18, 2016 and April 27, 2017, the proposed shared-use path connection will require a temporary easement from the Columbus Park (to be processed as an access permit with the Chicago Park District). As this project will utilize federal funds, Columbus Park is considered a Section 4(f) property eligible for protection under federal regulations 23 U.S.C. 138 and 49 U.S.C. 303, which were originally enacted as Section 4(f) of the Department of Transportation Act of 1966 and are still commonly referred to as "Section 4(f)." Section 4(f) protects publicly-owned parks, recreation areas, wildlife and waterfowl refuges, and historic properties on US DOT projects. The Chicago Park District is also an "official with jurisdiction" over Columbus Park.

The west-end trail connection concept includes a 450-foot shared-use path connection and several earthen berms which would be constructed on park property between Austin Boulevard and the existing Columbus Park path. At this early stage of Phase I project development, it is anticipated that the Department may need to temporarily close the trail at the tie-in of the west end path. The closure is anticipated to temporarily impact trail activities for a span of two to three days.

At the east end, the Chicago Park District requested improvements to the existing trail, grading to address drainage issues, and construction of new berms to provide some screening of the expressway. It is anticipated that these improvements will require closure of the existing trail for approximately two weeks, during which time a temporary aggregate path can be utilized to provide continued connectivity.

The overall I-290 undertaking (roadway reconstruction and widening) is estimated to last a total of eight years during which time there will be no permanent impacts to or alteration of the trail, and access along the trail will be unaffected. While construction activities will occur within Columbus Park, we believe that an exception to Section 4(f) is applicable because the construction activities will enhance Columbus Park. An exception to the requirement for Section 4(f)

approval is described in 23 CFR Part 774.13(g) "Transportation Enhancement Projects and Mitigation Activities," which is applicable when the following criteria are satisfied:

*(1) The use of the Section 4(f) property is solely for the purpose of preserving or enhancing an activity, feature, or attribute that qualifies the property for Section 4(f) protection; and*

*(2) The official(s) with jurisdiction over the Section 4(f) resource agree in writing to paragraph (g)(1) of this section.*

Both FHWA and IDOT believe that the improvements proposed at Columbus Park qualify as an enhancement activity and have requested concurrence by the Chicago Park District that the undertaking meets the above exception for Section 4(f) approval. We have requested their response by June 7, 2017.

If your office agrees that the planned construction within Columbus Park satisfies the exception that the "*The use of the Section 4(f) property is solely for the purpose of preserving or enhancing an activity, feature, or attribute that qualifies the property for Section 4(f) protection*", please concurrence by June 7, 2017

Sincerely,



Brad H. Koldehoff  
Cultural Resources Unit  
Bureau of Design & Environment

**CONCUR**

By: SA for R. Leibowitz  
Deputy State Historic Preservation Officer

Date: 5/26/17



# Illinois Department of Transportation

Office of Highways Project Implementation / Region 1 / District 1  
201 West Center Court / Schaumburg, Illinois 60196-1096

Project and Environmental Studies  
FAI 290 (I-290)  
US 12/20/45 (Mannheim Road) to Racine Avenue  
Cook County

May 31, 2017

Ms. Heather Gleason  
Director of Planning and Development  
Chicago Park District  
541 North Fairbanks  
Chicago, IL 60611

Dear Ms. Gleason:

The Illinois Department of Transportation (Department) is currently performing preliminary engineering and environmental studies for the improvement of I-290 from Mannheim Road to Racine Avenue. This Project is not currently included in the Department's FY 2017-2022 Proposed Highway Improvement Program. At this time only Phase I (planning) is funded. This Project represents a high priority for future funding consideration.

The proposed improvement is anticipated to include an additional lane west of Austin Boulevard and conversion of an existing lane in each direction to a managed lane east of Austin Boulevard. The HOT 3+ managed lane alternative was identified as the preferred alternative in the Draft Environmental Impact Statement (DEIS). The preferred alternative stays primarily within existing right-of-way (ROW) and only a minor amount of new ROW is needed near several interchanges. No permanent ROW is required from Columbus Park, and no displacements are required in the corridor.

The Department developed an east-west shared-use path concept that would be constructed as part of the I-290 improvements. The path would provide connectivity from the Illinois Prairie Path on the west to Columbus Park on the east. The path connection from Austin Boulevard to the existing Columbus Park Trail System would be constructed with the understanding that the Chicago Park District approved the connection and donated a temporary easement for construction of the connection. During coordination with the Chicago Park District, additional trail improvements were requested at the east end of Columbus Park to capitalize on the proximity of project-related construction activities, materials and equipment.



As discussed in a meeting with the Chicago Park District on November 18, 2016 and April 27, 2017, the proposed shared-use path connection will require a temporary easement from the Columbus Park (to be processed as an access permit with the Chicago Park District). As this project will utilize federal funds, Columbus Park is considered a Section 4(f) property eligible for protection under federal regulations 23 U.S.C. 138 and 49 U.S.C. 303, which were originally enacted as Section 4(f) of the Department of Transportation Act of 1966 and are still commonly referred to as "Section 4(f)." Section 4(f) protects publicly-owned parks, recreation areas, and wildlife and waterfowl refuges on US DOT projects.

The west-end trail connection concept includes a 450-foot shared-use path connection and several earthen berms which would be constructed on park property between Austin Boulevard and the existing Columbus Park path. At this early stage of Phase I project development, it is anticipated that the Department may need to temporarily close the trail at the tie-in of the west end path. The closure is anticipated to temporarily impact trail activities for a span of two to three days.

At the east end, the Chicago Park District requested improvements to the existing trail, grading to address drainage issues, and construction of new berms to provide some screening of the expressway. It is anticipated that these improvements will require closure of the existing trail for a duration of approximately two weeks, during which time a temporary aggregate path can be utilized to provide continued connectivity.

The overall I-290 project (roadway reconstruction and widening) is estimated to last a total of eight years during which time there will be no permanent impacts to or alteration of the trail, and access along the trail will be unaffected.

While construction activities will occur within Columbus Park, we believe that an exception to Section 4(f) is applicable because the construction activities will enhance Columbus Park. An exception to the requirement for Section 4(f) approval is described in 23 CFR Part 774.13(g) "Transportation Enhancement Projects and Mitigation Activities," which is applicable when the following criteria are satisfied:

*(1) The use of the Section 4(f) property is solely for the purpose of preserving or enhancing an activity, feature, or attribute that qualifies the property for Section 4(f) protection; and*

*(2) The official(s) with jurisdiction over the Section 4(f) resource agree in writing to paragraph (g)(1) of this section.*

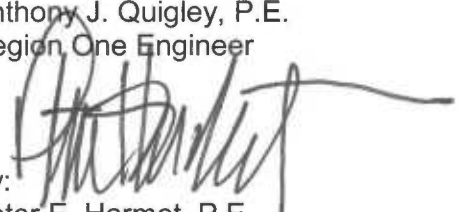
Ms. Heather Gleason  
May 31, 2017  
Page 3

If you agree that the construction within Columbus Park satisfies the exception that the *"The use of the Section 4(f) property is solely for the purpose of preserving or enhancing an activity, feature, or attribute that qualifies the property for Section 4(f) protection"*, please indicate your concurrence by signing the last page of this letter and returning it to the Department in the enclosed self-addressed envelope. We request a response by June 7, 2017, if possible.

If you have any questions or need additional information, please contact Mark Peterson, Project Manager, at (847) 705-4569.

Very truly yours,

Anthony J. Quigley, P.E.  
Region One Engineer

A handwritten signature in black ink, appearing to read 'Peter E. Harmet', with a long horizontal flourish extending to the right.

By:  
Peter E. Harmet, P.E.  
Bureau Chief of Programming

Attachments

Ms. Heather Gleason

May 31, 2017

Page 4

FAI 290 (I-290)

US 12/20/45 (Mannheim Road) to Racine Avenue

Cook County

This project meets conditions for the "Transportation Enhancement Projects and Mitigation Activities" exception according to Section 4(f) requirements as set forth in 23 C.F.R. 774.13(g):

Concur:

X

Do not concur:

\_\_\_\_\_

Signature:

Heather Gleason

Title:

DIRECTOR, PLANNING & DEVELOPMENT

Date:

6/19/17

Comments:

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