



SECTION 4(f)
DOCUMENTATION

FINAL

Illinois Route 13, 127, and 154

Pinckneyville Square



Perry County, Illinois

IDOT – Division of Highways

District Nine

November 2021

**MOBILITY IMPROVEMENTS TO SUPPORT ILLIONIS ROUTE 13, 127, AND 154
CITY OF PINCKNEYVILLE, PERRY COUNTY, ILLINOIS**

FINAL SECTION 4(f) EVALUATION
Submitted Pursuant to 49 USC
303
by the

U.S. Department of
Transportation/Federal
Highway Administration

and

Illinois Department of Transportation

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For FHWA

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ABSTRACT:

The proposed improvements for this project include roadway improvements within and adjacent to Pinckneyville, IL to improve traffic operations for the safety of motorists and to provide safe access for pedestrians around the Pinckneyville Square.

The Illinois Department of Transportation (IDOT) proposes to construct a 4-way fully signalized intersection in the southeast corner of Illinois Routes 13, 127 and 154, known as the Pinckneyville Square in Pinckneyville, Illinois. Signalized pedestrian crossings will be provided for all legs of the intersection.

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ACRONYMS AND ABBREVIATIONS

ADA	Americans with Disabilities Act
CFR	Code of Federal Regulations
DOI	Department of the Interior
DOT	Department of Transportation
FHWA	Federal Highway Administration
IDOT	Illinois Department of Transportation
NRHP	National Register of Historic Places
SHPO	State Historic Preservation Office

INTRODUCTION

Section 4(f) of the U.S. Department of Transportation Act of 1966, known as Section 4(f), provides for consideration of park and recreation lands, wildlife and waterfowl refuges, and historic sites during transportation project development. The law, now codified in 49 U.S.C. §303 and 23 U.S.C. §138, applies only to agencies within the U.S. Department of Transportation (U.S. DOT) and is implemented by the Federal Highway Administration (FHWA) and the Federal Transit Administration through the regulation at 23 CFR Part 774. Before approving a project that uses Section 4(f) property, FHWA must determine that there is no feasible and prudent alternative that avoids the Section 4(f) properties and that the project includes all possible planning to minimize harm to the Section 4(f) properties; or FHWA makes a finding that the project has a de minimis impact on the Section 4(f) property.

Section 4(f) protects publicly owned park and recreation areas that are open to the general public, publicly owned wildlife and waterfowl refuges, and public or privately owned historic sites. The term “historic sites” includes prehistoric and historic districts, sites, buildings, structures or objects listed in, or eligible for, the National Register of Historic Places (NRHP).

Use of a Section 4(f) property occurs: (1) when land is permanently incorporated into a transportation project; (2) when there is a temporary occupancy of land that is adverse in terms of the statute's preservation purpose; or (3) when there is a constructive use (a project's proximity impacts are so severe that the protected activities, features, or attributes of a property are substantially impaired).

DESCRIPTION OF PROPOSED ACTION

The Illinois Department of Transportation (IDOT) proposes to construct a 4-way fully signalized intersection in the southeast corner of Illinois Routes 13, 127 and 154, known as the Pinckneyville Square in Pinckneyville, Illinois (See Exhibit 1, Location Map of study area). Signalized pedestrian crossings will be provided for all legs of the intersection.

Purpose and Need

The purpose and need of the proposed project are to improve traffic operations for the safety of motorists and to provide safe access for pedestrians around the Pinckneyville Square in the City of Pinckneyville, Illinois.

Existing IL Route 13/127 intersects IL Route 154 on the south side of the Pinckneyville Square. Traffic movements and volumes at this intersection then split in numerous directions and configurations. Figure 1 below depicts the current 2020 traffic volumes and percent of truck traffic in blue while the numbers shown in red indicate the 2030 projection numbers.

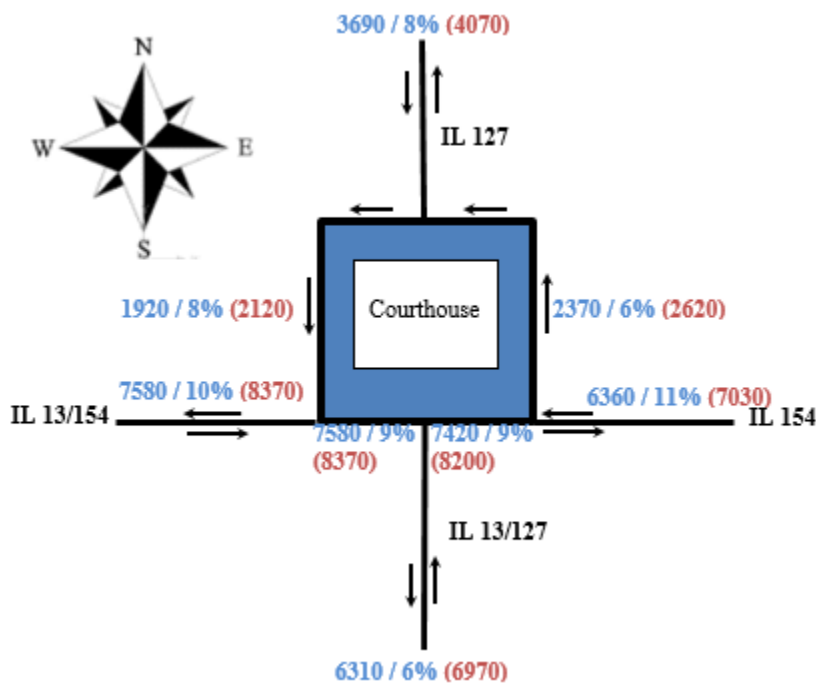


Figure 1 – Pinckneyville Square – Average Daily Traffic Volumes

On this south side of the square, the three state highways converge, resulting in an average daily traffic of up to 8370 vehicles per day with 10% truck traffic. The need for improvements is due to the high amount of traffic, particularly trucks, driving through the intersection of these state highways in a short distance with 90 degree turns, the

congestion and delays occurring from trucks maneuvering through the Square, and the resulting unsafe encroachments. These encroachments involve oversized vehicles being forced to drive into oncoming traffic, onto pedestrian pathways, or into parking areas in order to complete their turning movements.

The following photos show northbound IL 127 truck movements of a yellow cab semi around the square. The vacant Knights of Pythias Hall building to the right of the truck blocks sight distance (See Figure 2 below which depicts the location of the stop bar). The truck must encroach into the eastbound IL 154 traffic lane to look east. The yellow cab northbound truck must then use both east and west lanes of IL 154 while traveling north and crossing IL 154.



Figure 2 – Truck Encroachment – Eastbound IL 154

The northbound truck blocks both eastbound and westbound lanes and encroaches into the on-street parking of IL 154 while traveling north (Figure 3). The rear axle encroaches on the ADA curb ramp increasing danger for pedestrians.



Figure 3 – Truck Blocks Eastbound and Westbound Traffic on IL 154

A south facing street view photo below shows the curb ramp near the Odd Fellows building with multiple tire markings caused by encroachment across the pedestrian ramp (Figure 4).



Figure 4 – Tire Tracks on Pedestrian Ramp

The yellow cab northbound truck proceeds north along the east side of the square and

prepares for the second difficult maneuver to continue north on IL 127. (Note the proximity to the parked cars in Figure 5.)



Figure 5 – Yellow Cab Truck – Close Proximity to Parked Cars on IL 127

The yellow cab northbound truck proceeds north on the east side of the square and prepares for the second difficult maneuver to continue north on IL 127 (Figure 6).



Figure 6 – Yellow Cab Truck – Parking Spot Encroachment

The northbound truck must encroach into the SB IL 127 lane to turn and continue north on IL 127 (Figure 7).



Figure 7 – Yellow Cab Truck – Southbound IL 127 Traffic Encroachment

In addition, pedestrians going to the courthouse and businesses around the square are forced to maneuver their way through the traffic movements. The pedestrian traffic includes general business patrons, business employees, elementary and high school students, and courthouse attendees from the adjacent Perry County Jail. In the following photo, Perry County Jail prisoners are transported from the Jail to the courthouse in the path previously taken by the yellow cab northbound truck (Figure 8).



Figure 8 – Prisoner Transport – Pedestrian Path Encroachment

The following is a typical depiction of pedestrian and vehicle traffic following school

dismissal. Note the pedestrian students crossing the highway through the center of the intersection of concern (Figure 9).



Figure 9 – Students Crossing IL 154 Intersection of Concern

The southbound IL 127 movement is very difficult due to buildings blocking sight distance, tight turning radii, and on-street parking. The following photos show a southbound truck maneuvering through the limited space due to tight turning radii. The truck must encroach on the on-street parking and turn slowly to proceed southbound (Figures 10 and 11).



Figure 10 – Southbound Semi – Parking Spot Encroachment – Jackson Street



Figure 11 – Southbound Semi – Parking Spot Encroachment – IL 127

The following sequence of photos shows a white tanker truck traveling south on IL 127 and wanting to turn right onto westbound IL 154. This movement is difficult because the buildings block sight distance to the west and the tight turning radii. Note that the stopped white semi-truck is past the stop bar and encroaching into the crosswalk to see around buildings (Figure 12).



Figure 12 – Tanker Truck – Pedestrian Walk Encroachment – IL 154

The IL 127 southbound white tanker truck blocks all traffic lanes on IL 154 turning right onto IL 154 westbound and encroaches into the on-street parking and opposite traffic lane (Figure 13).



Figure 13 – Tanker Truck Blocking Both Traffic Lanes on IL 154

The southbound white tanker truck proceeds west on IL 154 and eastbound IL 154 traffic must stop and move over to allow truck turning movement.



Figure 14 – Tanker Truck – Eastbound Lane Encroachment – IL 154

The southbound white tanker truck proceeds west on IL 154 (still over the centerline) eastbound IL 154 traffic stops and moves over to allow truck turning movement (Figure 15).



Figure 15 – Traffic Stopped Due to Tanker Truck Lane Encroachment

Lastly, we have a blue semi-truck maneuvering the tight one-way loop traveling IL 127 southbound around the courthouse in downtown Pinckneyville at the IL 127 and IL 154 intersections. This movement is difficult because the buildings facing the courthouse block sight distance to the west. Cars queue up behind the slow moving blue semi-truck (Figure 16).



Figure 16 – Building Blocking Line of Sight for Blue Truck

The traffic configuration creates difficult turning movements so the blue semi-truck blocks both lanes of IL 154 and westbound IL 154 vehicles must wait at the appropriate distance to allow the truck to proceed southbound onto IL 13/127. Traffic queues up behind the blue semi-truck. Also note the white northbound IL 127 car, as it must encroach past the stop bar into the crosswalk due to sight distance limitations caused by Odd Fellows building to its right (Figure 17).



Figure 17 – Blue Truck Stops IL 154 Westbound Traffic

The traffic configuration creates difficult turning movements as the blue semi-truck blocks both lanes of IL 154. WB and EB IL 154 vehicles must wait at the appropriate distance to allow the truck to proceed southbound on IL 13/127. Traffic queues up behind the blue semi-truck. The white northbound car on IL 127 must clear out of the way so that the blue semi-truck can use both lanes to proceed south on IL 13/127 (Figure 18).



Figure 18 – Blue Truck Lane Encroachment IL 127

Crash history has also elevated the level of concern around the square. (See Exhibit #2.) Table 1 below provides a summary of the crash and injuries which have occurred around the Perry Courthouse square from 2012-2019. Based on the crash/injury data and an evaluation of the traffic directions, it appears that many of the crashes/injuries are directly related to line of sight availability and with tight maneuverability around the courthouse square.

Table 1 – Crash/Injury Summaries for 2012-2019 – Courthouse Square

Location	Crashes	Injuries	Injury Type
South Middle	29	5	A
		3	B
		1	C
North Middle	4	1	B
Southeast	6	1	B
Southwest	5	0	-
Summaries	44	11	-

(See Exhibit #2 for additional information regarding these summaries.) Based on this crash data analysis and the focus area described above, there is a need to improve safety and traffic mobility. The summary statistics indicate that on average, there is a crash that occurs around the Perry County Courthouse square every two (2) months and that injuries occur on average every eight (8) months.

DESCRIPTION OF SECTION 4(F) PROPERTIES (See Exhibit 3 for Legend)

In compliance with Section 106 of NHPA, a review of historic properties within an identified Area of Potential Effect (APE) for the project was performed to determine properties that were listed in or considered eligible for the National Register of Historic Places (NRHP). Properties that are listed or are eligible for listing on the NRHP are protected under Section 106 of the National Historic Preservation Act (NHPA) of 1966 and the Advisory Council Regulations for Protection of Historic Properties (36 CFR Part 800), which state that federal agencies must take into account the effects of their undertakings on historic properties and afford the Council a reasonable opportunity to comment on such undertakings. Table 2 below provides a list of the identified properties.

Table 2 – Section 4(f) Properties

Property Name	Section 4(f) Type	Officials with Jurisdiction (OWJ)	Section 4(f) Required (Alternative(s) requiring use)
Perry County Courthouse	Historic Property	SHPO	3A, 3C
Odd Fellows	Historic Property	SHPO	2A, 2C, 3A, 3B, 3C
Knights of Pythias	Historic Property	SHPO	3A, 3B, 3C
Former First National Bank	Historic Property	SHPO	2B, 2C
Former Murphy-Wall State Bank	Historic Property	SHPO	2B, 2C
Residence – 202 North Walnut Street	Historic Property	SHPO	No
Residence – 315 North Walnut Street	Historic Property	SHPO	No
Perry County Jail Museum	Historic Property	SHPO	No

#1 - The Perry County Courthouse is situated in the center of the town square in Pinckneyville, Illinois at the

conversion of Illinois Routes 13, 127 and 154. The Courthouse square is about 0.6 acres in size and is bounded by Jackson Street to the north, IL 154 / Water Street to the south, and North Main Street / IL 127 on the east and west. It was initially constructed at this site in 1850 and measured 36 by 46 feet



(11 m × 14 m) and was built of brick with Tuscan columns. In 1879, the County took possession of the property and a 45 by 36 feet (14m x 11m) addition to the building was added. A second addition was added in 1939. While the main entrance once sat in the middle bay of the original courthouse's façade, this location has been converted into a window, and twin entrances have since been placed in the middle of the 1879 addition. Between the building and the street is green space with a collection of war memorials. This property has been determined to be eligible for the National Register of Historic Places. It is owned by Perry County and houses several county government offices and court proceedings. Inmates at the Perry County Jail located southeast of this courthouse are guided by foot to this facility for their legal processes.

#2 – The Odd Fellows building is located at 2 East Water Street, directly south of the courthouse and east of McDonald's was formerly associated with the fraternal organization



Odd Fellows. The property is 0.07 acres in size and is a two-story brick commercial building which was constructed in 1906 and occupied by an Independent Order of Odd Fellows (IOOF) hall on the second floor over a clothing store. By 1927 the IOOF had left and the building ultimately housed numerous commercial businesses over the years. The building was damaged following a large structure fire directly adjacent to it in 2015.

Fire and water damage led to the City of Pinckneyville taking ownership at that time. The structure is not open to the public and no activities of any kind take place at the property. The building was determined to be eligible for the National Register of Historic Places in 2019.

#3 – *Knights of Pythias building* is located at 14-16 South Main Street, directly south of the building at 2 East Water Street (Odd Fellows Hall), was formerly associated with the fraternal organization ***Knights of Pythias***. This two-story red brick building was constructed in 1906 with the 14 S. Main Street section vacant and the 16 S. Main Street section housing a saloon with the Knights of Pythias Hall located on the second floor. It occupies less than 0.12 acres. Over the years, the building has housed several types of businesses on the lower floors and the second story had been renovated to provide some residential apartments. Currently, the first floor of each building is vacant, and the apartments are vacant as well. The building is in private ownership and the owner has indicated that the structure is in a state of disrepair and therefore unoccupied. The building was determined to be eligible for the National Register of Historic Places in 2019.



#4 – *Former First National Bank* occupies less than 0.03 acres, is located at 1 North Main Street, directly southwest of the Perry County Courthouse. This structure was determined to be eligible for the National Register of Historic Places. Its design is Neoclassical and it was constructed in 1920. It is currently privately owned and is utilized as a counseling center.



#5 – *Former Murphy-Wall State Bank* is located at 17 West Water Street in the northeast corner of the intersection of IL 154 with Walnut Street and is approximately 0.07 acres. The bank moved to this new location in 1907 and was previously located on the north side of the Pinckneyville square. This Neoclassical building rises two stories and is topped with a flat roof. Both west and south elevations have yellow brick facing and are defined by a series of recessed bays formed by brick piers and topped with stone volutes, as well as quoined corners surmounted by large, carved stone ornaments. Three safes associated with the bank's history remain in good condition. In 1925, the interior was refurbished by replacing the iron grill work with bullet-proof glass and small openings for conversation. In 1983, the bank moved to a new location on Water Street.



This structure has been determined to be eligible for the National Register of Historic Places. It is currently privately owned and houses a formal wear boutique. Only the bottom floor of the building is open to the public and in use as one of the community's businesses,

showcasing its historical attributes.

#6 – 202 North Walnut Street is located in the northeast corner of the intersection of Walnut Street with Laurel Street and is currently a private residence. The home is situated on approximately 0.23 acres and retains its original Colonial Revival architectural style, subtype Georgian Revival, and was constructed in 1896.



This structure's history and maintained attributes make it eligible for the National Register of Historic Places. It is in private ownership and currently occupied. It is not open to the public.

#7 – 314 North Walnut Street is located in the southeast corner of the intersection of Walnut Street with North Street and is a residence which appears to occupy approximately 0.51 acres. This home is of prominent bungalow architecture with a compatible garage. The house was constructed in 1921 and its maintained prominent features make it eligible for the National Register of Historic Places. It is in private ownership and currently occupied. It is not open to the public.



#8 – The Perry County Jail Museum is located at 108 West Jackson Street, in the southeast corner of Jackson Street with North Perry Street and occupies approximately 0.23 acres. This location is nearly a block west of Walnut Street. The museum was formerly the county's third jail and was built in 1841. The Sheriff and his family lived in the upstairs portion and women prisoners were kept in locked rooms. The men were housed downstairs. Today, the building houses the



museum collection which includes a one-room school, clothing, furniture, and other artifacts that date back to the 1800s. This structure is listed on the National Register of Historic Places. It is owned by the Perry County Historical Society and is open to the public.

Building).. In addition, it would displace/impact nine businesses and two residences. The businesses displaced would be the First National Bank Loan Department, Dairy Queen Restaurant, Perry County Sheriff and Jail, Pinckneyville Eyecare, former mechanic shop, Lynn’s Salon, Kay’s Massage, and parking areas for Whittenuer Chiropractic and Murphy Wall State Bank & Trust. This alternative will involve the conversion of property to highway use. In addition, this roadway relocation and introduction of actual highway traffic levels would increase traffic noise levels in an area that is now a quiet neighborhood with local traffic only. Portions of Locust Street, Mulberry Street, Jackson Street, and Laurel Street



would be converted from residential streets to a state highway with this alternative. Designs for this alternative have not been prepared but based on traffic counts it appears that the traffic through these streets would more than double and truck traffic would now be introduced in areas that trucks are not currently accessing.

This alternative meets the purpose and need. Improvements to traffic operations and safety would be attained and eliminating the unsafe traffic encroachments and congestion around the square would improve pedestrian safety.

Alternative 2B – Shift Illinois Route 13/127 to the west

This alternative would match the existing roadway’s width, providing two lanes that would veer westerly off the existing alignment to the south of the square, provide the intersection at IL 154 (Water St.) at the existing Walnut

Street location, and veer back onto the existing IL 127 alignment just north of Laurel St. to the north of the Square.

Two of the eight identified 4(f) properties would be demolished with this alternative (#5 – Former Murphy-Wall State Bank and (#4 – Former First National Bank).

This alternative has the potential to displace 30 businesses and four residents. The businesses include the Pinckneyville Chamber of Commerce, John Hammack Insurance, Panther Exchange, Hammack Apartments, Melisa the Hair Dresser, Loo's Law Office, Farmer's Insurance, York Heating and Air, Thomas Home Improvement, EOE Lodge, Moose Lodge, White Rabbit, Pinckneyville Press, Reese Tax Service, Place Insurance, Florist, H&R Block, Save A Lot, Shades Tanning, Perry Co. Roofing, Raymond James Financial, Moxie Salon, Verizon Cellular, Stotlar Drug, , an antique store located on North Main Street, Stuart Morgenstern Law Office, ICAN Computer Repair, Medical Arts building (located on W Jackson and N Walnut), and the Post Office. It should be noted that the old Denn Family Chiropractic building and the United Energy Savings building both appear vacant but will be displaced by this alternative. Displacements are the result of building demolition as well as the loss of road frontage and potential parking areas as well since many of these businesses rely on street parking for access. Impacts would include the conversion of property to highway use. In addition, this roadway relocation would increase traffic noise levels in an area that is now a quiet neighborhood with local traffic only. As noted by 2020 traffic counts, the truck traffic to this area accounts for approximately 10% of the traffic. Portions of Walnut Street that lie between Randolph and Laurel will be converted to a state highway with this alternative. It should be noted that this portion of Walnut Street conversion will triple the amount of car traffic and will double the amount of truck traffic that this portion of road currently receives.

This alternative meets the purpose and need. Improvements to traffic operations and safety would be attained and eliminating the unsafe traffic encroachments and congestion around the square would improve pedestrian safety.

Alternative 2C – Split Illinois Route 13/127 into a one-way traffic couple

This alternative would provide a one-way traffic couple using the alignments of Alternative 2A and 2B. But the roadway width in each direction would provide for one travel lane with shoulders on either side. The leg of the one-way couple matching the alignment of Alternative 2A would accommodate northbound traffic while the leg matching the alignment of Alternative 2B would accommodate southbound traffic. Intersections would then be required at Illinois Route 154 (Water St.) at the Locust Street location to the east and at the Walnut Street location to the west.

Three of the eight identified 4(f) properties would be demolished with this alternative (#5 – Former Murphy-Wall State Bank), (#4 – Former First National Bank), and (#2 – Odd Fellows building) could potentially be impacted but it is unclear based on the exact location of the right of way which will be needed so at this time it is unclear how much if any of the structure would be altered. The rear corner of this building will be impacted, and the full extent of impact will be contingent on the ability to stabilize the wall in order to preserve the front portion of the building. Impacts would include the conversion of property to highway use. The businesses and residences previously discussed in Alternatives 2A and 2B will be displaced/affected. This includes a total of 39 business displacements and 6 residential displacements. These displacements result from building demolition activities as well as the loss of parking areas and access to the



businesses. In addition, this roadway relocation and introduction of actual highway traffic levels would increase traffic noise levels in an area that is now a quiet neighborhood with local traffic only. Also, as previously discussed, this alternative will involve the conversion of city roads to state roads along portions of Walnut Street and Locust Street. It should be noted that the portion of Walnut Street conversion will triple the amount of car traffic and will double the amount of truck traffic that this portion of road currently receives.

This alternative meets the purpose and need. Improvements to traffic operations and

safety would be attained and eliminating the unsafe traffic encroachments and congestion around the square would improve pedestrian safety.

ALTERNATIVE 3 – Newly Proposed Intersection Improvements

Exhibit 5 depicts the Alternative 3 variations with respect to 4(f) resources. These alternatives **utilize to the greatest extent possible, the vacant lots that exist around the Pinckneyville Square while minimizing impacts to existing businesses or residents:**

Empty lots are located along the east side of the square as well as to the north, and one vacant lot is located to the south of the square. However, the Perry County Jail is located directly east of the southern vacant lot and the Perry County Courthouse is located in the center of the town square. In order to avoid impacts to both of these highly utilized properties, further research into existing properties was done. Two existing vacant buildings are located directly south of the square, just west of the southern vacant lot. One building was damaged by an adjacent structure fire and is currently owned by the city. The other is a structurally compromised building that formerly housed tenants. Due to the deterioration of both buildings, each owner is interested in disposing of their respective property. With respect to the project's Purpose and Need, improvements could be realized in traffic mobility and the safety of both travelling motorists and pedestrians. In addition, the impacts to the two vacant buildings south of the square would not affect the town's commercial base.

Therefore, IDOT investigated various types of intersections that could potentially fit in the existing available footprint around the east side of the square.

ALTERNATIVE 3A – Roundabout Intersection

This alternative proposes a roundabout intersection in which traffic would be permitted to flow in one direction around a central island, and traffic entering the roundabout would be required to yield to traffic already in the roundabout.

While the roundabout option provides the best level of service with its ease of travel and minimal traffic delays, due to its large footprint, there are several impacts this option would have on adjacent facilities. The jail would lose its access to the alley along its west side and parking spaces along the front of the building would be eliminated. The circulation of the McDonald's drive-thru traffic would also be required to be rerouted, which in turn would affect their existing parking along Water Street. This alternative would impact a 4(f) property (22 ft² of the southeast corner of the



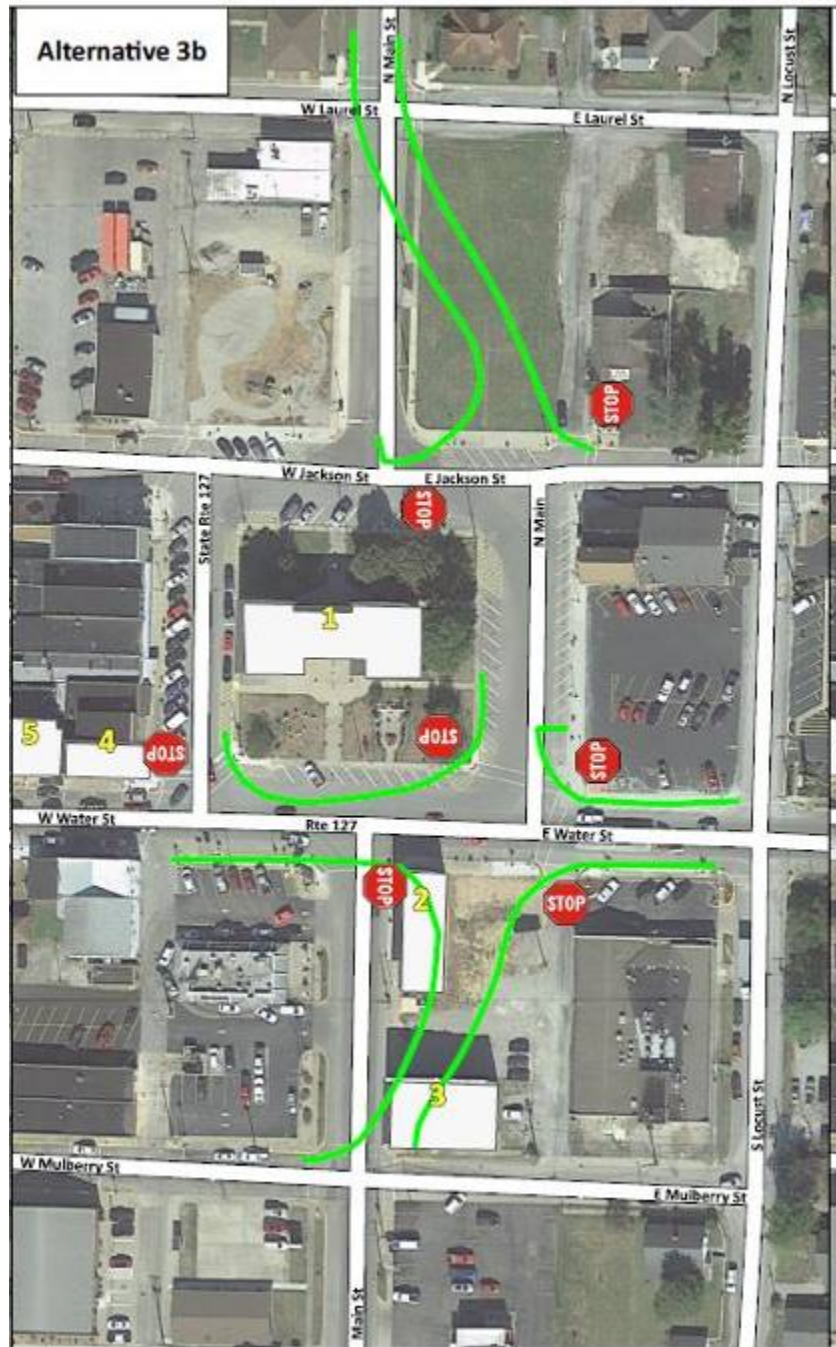
courthouse lawn, #1 – Perry County Courthouse). The two 4(f) properties south of the square would be total takes with this alternative (#2 – Odd Fellows Building and #3 – Knights of Pythias.) No quiet neighborhoods or other properties sensitive to actual highway traffic noise increases (i.e. nursing homes, schools, etc.) as defined by 23 CFR 772 would be affected with this alternative since the footprint lies within the existing area around the Courthouse square and does not shift to additional street locations. Therefore, noise impacts would be negligible since the traffic is not rerouted to other streets, but the roundabout encourages better traffic movement.

This alternative meets the purpose and need. Improvements to traffic operations and safety of motorists and pedestrians would be attained with this alternative.

Alternative 3B – 4-Way Stop Intersection in Southeast Corner of Square.

This alternative proposes a 4-way stop intersection that would require motorists at each leg of the intersection to come to a full stop, then yield to other motorists already at the intersection by taking turns proceeding through.

Improvements to pedestrian traffic would occur with marked crosswalks on three legs of the intersection. This requires a level of interpretation and confusion by the motorists as to who proceeds first. The 4-way stop option provides the least impact to right of way, but the worst level of service due to the backup of traffic during heavy traffic. In addition, because of the randomness of the traffic movements on all legs of the 4-way intersection, pedestrian signal heads cannot be utilized. This requires the pedestrians to carefully monitor the traffic movements and use their own judgement when proceeding through the crosswalk. The jail and McDonald's circulation could operate without any changes since the only impacts to these two properties lie along the northern boundaries. It appears that McDonalds would have some impacts to the seven parking spaces located north of the site and



the jail could potentially have some impacts to the six parking spots that exist along its northern boundary. It should be noted that no sensitive receptors would experience noise increases with this alternative since much of the same traffic would still be traveling through this area. The two 4(f) properties south of the square would be total takes with this alternative (#2 – Odd Fellows and #3 – Knights of Pythias). Capacity analyses indicate long and unacceptable backups in all directions with this 4-way stop alternative. No quiet neighborhoods or other properties sensitive to actual highway traffic noise increases (i.e. nursing homes, schools, etc.) as defined by 23 CFR 772 would be affected with this

alternative since this alternative shifts the traffic around the courthouse in the same direction as previous traffic with the exception of the installation of the four-way stop.

This alternative would meet the purpose and need for improving pedestrian access and safety. However, traffic operations are not expected to improve and therefore does not fully meet the purpose and need.

Alternative 3C – Signalized Intersection in Southeast Corner of Square.

This alternative proposes a 4-Way fully signalized intersection with pedestrian signals at each crosswalk. The timing of the signals allowing stop and go traffic is determined by actual traffic counts within the vicinity of the intersection and is carried out electronically.

With this alternative traffic congestion is monitored, and changes can be made to the



timing to improve traffic mobility as required. The signalized intersection provides acceptable levels of service for all legs of the intersection and while some right of way is needed at the jail and McDonalds no major changes to current circulation or parking is necessary. Signalized pedestrian crossings and signal heads will be provided for all legs of the intersection. Access to the alley adjacent to the jail can still be provided. No quiet neighborhoods or other properties sensitive to actual highway traffic noise increases as defined by 23 CFR 772 would be affected with this alternative since the amount of traffic through this area would not change, but rather only the manner in which the traffic proceeds through the area. This alternative would impact a 4(f) property (10 ft² of lawn in the southeast corner of #1 – Perry County Courthouse). The two 4(f) properties south of the square would be total takes with this alternative (#2 – Odd Fellows and #3 – Knights of Pythias).

This alternative meets the purpose and need. Improvements to traffic operations and safety will be achieved in addition to providing pedestrian access to and from the courthouse square which is safe and efficient. Impacts to businesses along Water Street and North Main are minimized and should be negligible.

AVOIDANCE ALTERNATIVES

Alternatives 1 avoids the use of Section 4(f) properties.

Alternative 1 – No Action

Although there would be no use of the Section 4(f) properties, this alternative does not meet the purpose and need. Congestion and delays would still be present since traffic will continue to use these three state routes through the Pinckneyville Square, trucks will continue to maneuver through the 90 degree turns in a short distance, resulting in unsafe encroachments into other lanes, parking areas, and pedestrian use areas. Therefore, while this alternative is feasible, it is not prudent since it still results in unacceptable safety and/or operational problems.

Alternatives Summary

Table 3 provides a summary of the alternatives with respect to purpose and need, impacts to 4(f) properties, displacements, street conversions, and least harm analysis.

Table 3 – Alternatives Summary

Alternative	Description	Meet P&N?	Impacts 4(f) properties?	Displacements		State traffic moved to neighborhood Streets?	Alternative Carried Forward to Least Harms Analysis?
				Businesses	Residences		
1	No Action	N	N	0	0	N	NO - Fails to Meet P&N
2A	Shift IL Route 13/127 to the east	Y	Y	9	2	Y	YES
2B	Shift IL 13/127 to the west	Y	Y	30	4	Y	YES
2C	Split IL 13/127 into a one-way couple	Y	Y	39	6	Y	YES
3A	Roundabout intersection	N	Y	0	0	N	NO - Fails to Meet P&N
3B	4-way stop intersection in SE Corner of Square	Y	Y	0	0	N	YES
3C	Signalized intersection in SE Corner of Square	Y	Y	0	0	N	YES

Alternative 1 avoids the use of Section 4(f) property but does not meet the purpose and need

Alternative 3B (while not an avoidance alternative) does not fully satisfy the purpose and need for the project and is dismissed from further consideration. Therefore, Alternative 1 and 3B are dismissed from additional consideration and will not be further evaluated.

The remaining alternatives, Alternatives 2A, 2B, 2C, 3A, and 3C, all meet the purpose and need for the project and all have impacts to Section 4(f) properties. Therefore, these alternatives were carried forward to analyze in a least overall harm analysis to Section 4(f) properties. In balancing the impacts that would be caused by these five alternatives, we must consider multiple factors in the analysis, including impacts to Section 4(f) resource and other environmental and engineering factors.

LEAST OVERALL HARM ANALYSIS

Seven alternatives were evaluated to meet the purpose and need of the proposed project and to minimize Section 4(f) impacts.

One alternative was dismissed since it was determined not be a feasible and prudent avoidance alternative (Alt 1) and one alternative (Alt 3B) was dismissed because it did not fully meet the purpose and need for the project.

The remaining five alternatives meet the purpose and need for the project, but each has impacts to Section 4(f) resources. When there is no feasible and prudent avoidance alternative, FHWA “may approve only the alternative that causes the least overall harm in light of the statute’s preservation purpose.” Therefore, the five alternatives which were carried forward to the least harm’s analysis are listed in Table 4 below.

Table 4 – Alternatives Evaluated for Least Harm

Alternative	Section 4(f) Properties Impacted	Demolished?	4(f) Property Converted to Highway Use (ft ²)	TOTAL 4(f) Property Converted to Highway Use (ft ²)
2A	Odd Fellows	Y	3,050	3,050
2B	Former First National Bank	Y	1,307	4,357
	Former Murphy - Wall State Bank	Y	3,050	
2C	Odd Fellows	Y	3,050	7,407
	Former First National Bank	Y	1,307	
	Former Murphy - Wall State Bank	Y	3,050	
3A	Perry County Courthouse	N	22	8,299
	Odd Fellows	Y	3,050	
	Knights of Pythias	Y	5,227	
3C	Perry County Courthouse	N	10	8,287
	Odd Fellows	Y	3,050	
	Knights of Pythias	Y	5,227	

The “least overall harm” is determined by balancing the following factors (23 CFR 774.3(c)):

- a) The relative significance of each 4(f) property
- b) The ability to mitigate adverse impacts to each Section 4(f) resource, including any measures that result in benefits to the property
- c) The relative severity of the remaining harm, after mitigation, to the protected activities, attributes, or features that qualify each Section 4(f) property for protection

- d) The views of the official(s) with jurisdiction over each Section 4(f) property
- e) The degree to which each alternative meets the purpose and need for the project
- f) After reasonable mitigation, the magnitude of any adverse impacts to resources not protected by Section 4(f)
- g) Substantial differences in costs among the alternatives.

Based upon the evaluation of the above factors, Alternative 3C (Signalized Intersection in the Southeast Corner of Square) would result in the least harm to Section 4(f) resources. The criteria for this determination are explained below.

a) The relative significance of each 4(f) property:

In reviewing the alternatives as previously identified (2A, 2B, 2C, 3A, 3C) there are five 4(f) properties that will be affected by these alternatives. These include the Perry County Courthouse (#1), the Knights of Pythias Building (#2), the Odd Fellows building (#3), the First National Bank (#4), and the former Murphy-Wall State Bank (#5). All of these properties were constructed in the early 1900s. From a historical standpoint they are all relatively the same with regards to historical relevance and are considered applicable under Criteria C for historical significance at the state and local level.

The quality of the 4(f) resources associated with Alternative 2B and 2C are considered higher since both of these buildings are in better structural condition and have been maintained/renovated by the current property owners. These two alternatives both affect the former First National Bank (#4) and the former Murphy-Wall State Bank (#5). These two structures have not been damaged by fire and water as the Odd Fellows Building (#2) and the Knights of Pythias (#3) building. The two bank buildings were also shown to be some of the first brick buildings that were constructed on the Pinckneyville square as well and are significant due to their Neoclassical construction. In addition to these demolitions, 2C also results in the demolition of the Odd Fellows building (#2).

The 4(f) resources impacted by Alternative 2A includes the Odd Fellows Building (#2) which would be demolished. However, the quality of this historic property has deteriorated over the years due to fire damage, water damage, and lack of basic maintenance. Due to the expenses that would be incurred, the current property owners do not have any plans to rehab this building.

The 4(f) resources impacted by Alternative 3A and 3C include the Perry County Courthouse (#1), the Knights of Pythias Building (#2), and the Odd Fellows Building (#3). The Knights of Pythias Building and the Odd Fellows Building would be demolished. However, the quality of these two historic properties has deteriorated over the years due to fire damage, water damage, and lack of basic maintenance. Due to the expenses that

would be incurred, the current property owners do not have any plans to rehab these buildings. While the impact to the Perry County Courthouse does not affect the structure of the building in any way, it does convert a small area (10 ft² of the southeast corner of its lawn) to transportation use. However, this conversion is in a corner of the property that currently experiences damage from encroaching tire paths of large truck attempting turning movements onto northbound Illinois Route 127 and would be impacted by both Alternative 3A and 3C. However, it should be noted that due to the larger footprint of Alternative 3A, the property conversion in the same corner of the courthouse lawn would be greater, thus causing greater harm.

b) The ability to mitigate adverse impacts to each Section 4(f) resource, including any measures that result in benefits to the property:

Alternative 3C, the signalized intersection in the southeast corner of the square, results in the conversion of 10 ft² of the Perry County Courthouse lawn to transportation use. This is half of the square footage impacts that would affect the Courthouse as required for Alternative 3A. This impact would involve the construction of a turning lane with concrete curb to guide southbound to westbound turning movements. Mitigation for this impact will involve placing an approved interpretive panel inside the courthouse lobby that celebrates its historic significance to the City. Alternative 3C also results in the demolition of the building located at 2 East Water Street (formerly associated with the fraternal organization Odd Fellows) and the demolition of the building located at 14-16 South Main Street (formerly associated with the fraternal organization Knights of Pythias.) Mitigation for these properties will include HIER recordation and placement of decorative lighting and landscaping that will enhance the design currently in place around the square. It should be noted that the HIER recordation may not occur unless it occurs based on this highway project.

Alternative 3A results in the conversion of 22 ft² of the Perry County Courthouse lawn to transportation use. This is double the square footage impacts that would affect the Courthouse as required for Alternative 3C. The same mitigation terms for 3C would be applicable for Alternative 3A which include placing an approved interpretive panel inside the courthouse lobby that celebrates its historic significance to the City and the HEIR recordation and placement of decorative lighting and landscaping that will enhance the design currently in place around the square. Alternative 3A also results in the demolition of the building located at 2 East Water Street (formerly associated with the fraternal organization Odd Fellows) and the demolition of the building located at 14-16 South Main Street (formerly associated with the fraternal organization Knights of Pythias.) Mitigation for these properties will include HIER recordation and placement of decorative lighting and landscaping that will enhance the design currently in place around the square. It should be noted that the HIER recordation may not occur unless it occurs based on this highway project.

Alternative 2A and 2C results in the demolition of the building located at 2 East Water Street (formerly associated with the fraternal organization Odd Fellows). Mitigation for this property will include HIER recordation and placement of decorative lighting and landscaping that will enhance the design currently in place around the square. It should be noted that the HIER recordation may not occur unless it occurs based on this highway project.

Alternatives 2B and 2C would both result in the demolition of the former Murphy-Wall State Bank (#5) and the Former National Bank (#4). Mitigation for these properties will include HIER recordation.

c) The relative severity of the remaining harm, after mitigation, to the protected activities, attributes, or features that qualify each Section 4(f) property for protection:

After mitigation is complete, Alternatives 2B will result in the demolition of two 4(f) properties, the Former First National Bank (#4) and the Former Murphy-Wall State Bank (#5). The loss of these two buildings rids the square of the first brick buildings constructed on the square. It is highly unlikely that the Former Murphy-Wall State Bank could be restored to its original condition based on the extensive alteration (thus considered a complete loss) that would be required for these two alternatives. These old banks have more local historic relevance than the impacts to the other 4(f) resources taken from other alternatives.

After mitigation is complete, Alternatives 2C will result in the demolition of three 4(f) properties, the Odd Fellows building (#2), the Former First National Bank (#4) and the Former Murphy-Wall State Bank (#5). The loss of the two bank buildings rids the square of the first brick buildings constructed on the square. It is highly unlikely that the Former Murphy-Wall State Bank could be restored to its original condition based on the extensive alteration (thus considered a complete loss) that would be required for these two alternatives. These old banks have more local historic relevance than the impacts to the other 4(f) resources taken from other alternatives.

After mitigation is complete, Alternative 2A will result in the complete demolition of the Odd Fellows Building (#2). It should be noted that this building is in disrepair due to a previous fire and subsequent water damage.

After mitigation is complete, Alternatives 3A and 3C result in the loss of a portion of the southeast lawn of the Perry County Courthouse (#1) and the complete demolition of the Odd Fellows Building (#2) and the Knights of Pythias building (#3). It should be noted that Alternative 3A results in a larger area loss to the Perry County Courthouse (#1) and is therefore more harmful than Alternative 3C. While both Alternative 3A and 3C result in total takes of property #2 and #3.

d) The view of the official(s) with jurisdiction over each Section 4(f) property:

The State Historic Preservation Officer is the OWJ for this review and will be provided a copy of the draft 4(f) document to request their views on the impacts on each Section 4(f) property. In addition, it should be stated that a signed Memorandum of Agreement (MOA) was signed in June 2020 by the Federal Highway Administration, the Illinois Department of Transportation, and the Illinois State Historic Preservation Officer regarding the realignment of Illinois Rout 127 in the City of Pinckneyville, Perry County, Illinois. will be sought after the public review of this Section 106/Section 4(f) document. This MOA identified measures to resolve adverse effects to the Perry County Courthouse (#1), the former Odd Fellows Building (#2), and the Knights of Pythias building (#3). (See Exhibit #6).

e) The degree to which each alternative meets the purpose and need for the project:

The purpose and need of the proposed project are to improve traffic operations for the safety of motorists and to provide safe access for pedestrians around the Pinckneyville Square in the City of Pinckneyville, Illinois. Alternatives 2A, 2B, 2C, 3A and 3C all satisfy the purpose and need equally.

f) After reasonable mitigation, the magnitude of any adverse impacts to resources not protected by Section 4(f):

Alternatives 2A, 2B, and 2C would impact the cohesive quality of their respective neighborhoods including displacements and impacts to businesses and residences. Alternative 2A results in the loss/disruption of nine businesses and two residences, 2B results in the loss/disruption of 30 businesses and four residences, and Alternative 2C results in the loss/disruption of 39 businesses and six residences. None of these alternatives should impact any trees along these corridors since the majority of the area is lined with concrete sidewalks, parking lots, and buildings. Additionally, these alternatives would route additional traffic through now quieter streets with local traffic only. According to the 2020 traffic counts, this will increase truck traffic in these areas of up to 10%. With Alternative 2A the increased traffic will all be routed to North/South Locust Street. With Alternative 2B the increased traffic will all be routed to North/South Walnut. With Alternative 2C, this traffic will be split between North/South Walnut Street and North/South Locust Street. It would not be possible to mitigate for the additional traffic in these quiet neighborhoods with the change of functional class from a residential street to a state highway. These streets are primarily populated with businesses and the impacts to the residences are located at the northern and southern ends of the alternate route tie in locations.

Alternative 3A would result in a roundabout intersection with a large footprint. Impacts associated with this alternative include changing and limiting access to the Perry County

Jail and McDonald's (two potential parking spots at the Jail and up to two parking spots at McDonalds). Both businesses experience high levels of vehicle and pedestrian traffic and would be located in very close proximity to the entrance and exit points of the intersection. Alternatives to the entrances and traffic patterns at the businesses could be required which could affect ease of access to the buildings.

Alternative 3C is a signalized intersection that would provide acceptable levels of service for all legs of the intersection. While some right of way is needed at the Jail and McDonalds, it appears that only one or two parking spots for the Jail and McDonalds would be affected by this design. It should be noted that no major changes to the current circulation or parking areas for either of these facilities appear necessary.

g) Substantial differences in costs among the alternatives.

None of the five evaluated alternatives appear to be substantially different in relation to costs. The relative differences in these alternatives are based largely on business displacements/disruptions and loss of right of ways as well as the demolition of 4(f) properties.

Alternative 2A results in the loss/disruption of nine businesses and two residences, 2B results in the loss/disruption of 30 businesses and four residences, and Alternative 2C results in the loss/disruption of 39 businesses and six residences. Property conversion/acquisition for highway use would be required for all three of these alternatives. Not only would these alternatives require intersections to be rebuilt, but they would also require substantial lengths of new roadway to be built with drainage and utility modifications.

Comparatively, Alternatives 3A and 3C involve intersection construction only with each requiring two displacements. However, Alternative 3A would require greater modifications and property conversion/acquisition at the Perry County Jail and McDonald's than that of Alternative 3C.

Summary

The five alternatives will all result in impacts to business and residential properties and four of them will affect individually eligible historic properties. Table 5 provides a summary of the Least Harm determinations.

Table 5 – Least Harm Determinations

Factors (23 CFR 774.3)	ALTERNATIVES					LEAST OVERALL HARM
	2A	2B	2C	3A	3C	
The ability to mitigate adverse impacts to Section 4(f) property	The building impacted by this alternative would be photo documented prior to being demolished or altered.	The two buildings (Former Murphy-Wall State Bank and Former First National Bank) impacted by this alternative would be photo documented prior to being demolished or altered.	The two buildings (Former Murphy-Wall State Bank and Former First National Bank) impacted by this alternative would be photo documented prior to being demolished or altered.	The two buildings impacted by this alternative would be photo documented prior to being demolished or altered. The impacts to the Perry County Courthouse would include interpretive panels inside the Courthouse lobby to celebrate its historic significance and the inclusion of decorative lighting and landscaping.	The two buildings impacted by this alternative would be photo documented prior to being demolished or altered. The impacts to the Perry County Courthouse would include interpretive panels inside the Courthouse lobby to celebrate its historic significance and the inclusion of decorative lighting and landscaping.	Neutral Among All Alternatives
Remaining harm to Section 4(f) properties after mitigation	Odd Fellows Building - The remaining harm, after mitigation, is that the building will be demolished and photo documented. The building will no longer be eligible for the NRHP.	Former Murphy-Wall State Bank - The remaining harm, after mitigation, is the building will be demolished and photo documented. The building will no longer be eligible for the NRHP. Former First National Bank - The remaining harm, after mitigation, is the building will be demolished and photo documented. The building will no longer be eligible for the NRHP.	Former Murphy-Wall State Bank - The remaining harm, after mitigation, is the building will be demolished and photo documented. The building will no longer be eligible for the NRHP. Former First National Bank - The remaining harm, after mitigation, is the building will be demolished and photo documented. The building will no longer be eligible for the NRHP.	Perry County Courthouse - The remaining harm is minimized by the small ROW acquisition (22 ft ²) from a corner of the lot that the Courthouse sits on. The Section 4(f) property will remain eligible for the NRHP. Odd Fellows Building - The remaining harm, after mitigation, is that the building will be demolished and photo documented. The building will no longer be eligible for the NRHP. Knights of Pythias building - The remaining harm, after mitigation, is that the building will be demolished and photo documented. The building will no longer be eligible for the NRHP.	Perry County Courthouse - The remaining harm is minimized by the small ROW acquisition (10.5 ft ²) from a corner of the lot that the Courthouse sits on. The Section 4(f) property will remain eligible for the NRHP. Odd Fellows Building - The remaining harm, after mitigation, is that the building will be demolished and photo documented. The building will no longer be eligible for the NRHP. Knights of Pythias building - The remaining harm, after mitigation, is that the building will be demolished and photo documented. The building will no longer be eligible for the NRHP.	Neutral Among All Alternatives
Relative significance of Section 4(f) properties	Odd Fellows Building - State and local historic significance.	Former Murphy-Wall State Bank - state and local historic significance. Former First National Bank - state and local historic significance.	Former Murphy-Wall State Bank - state and local historic significance. Former First National Bank - state and local historic significance.	Perry County Courthouse - State and local historic significance. Odd Fellows Building - State and local historic significance. Knights of Pythias building - State and local historic significance.	Perry County Courthouse - State and local historic significance. Odd Fellows Building - State and local historic significance. Knights of Pythias building - State and local historic significance.	Neutral Among All Alternatives
View of official with jurisdiction	Views of the official with jurisdiction (Illinois State Historic Preservation Officer) are pending and will be included after the comment period on the Draft 4(f) Evaluation expires.					N/A
Degree to which alternative meets P&N	Not a distinguishing factor among alternatives					N/A
Magnitude of any adverse impacts to resources not protected by Section 4(f)	* traffic diverted from state route to local streets that do not serve state traffic * 9 business and 2 residential relocations	* traffic diverted from state route to local streets that do not serve state traffic * 30 business and 4 residential relocations	* traffic diverted from state route to local streets that do not serve state traffic * 39 business and 6 residential relocations	* Change/limited access to McDonalds and the Perry County Jail	* None noted	ALT 3C
Substantial Difference in Cost Among Alternatives	Not a distinguishing factor among alternatives					N/A

In conducting the least harms analysis, each alternative has similar costs, and thus cost was not a factor in the analysis. Alternative 3C is the preferred alternative that will cause the least overall harm for the following reasons:

1. It results in use of Section 4(f) historic properties that are not currently being used or being maintained for occupation (Odd Fellows building and Knights of Pythias). Alternative 3C does have a Section 4(f) use of the Perry County Courthouse, an historic property of local and state significance, but the Section 4(f) use of the Perry County Courthouse is minimal with a small amount (10 ft²) of lawn taken from a corner of the property.
2. It would not require conversion of a residential street to a state route like Alternatives 2A, 2B and 2C.
3. It does not require the displacement of residences or businesses.

MITIGATION

For the preferred Alternative 3C (Signalized Intersection), in accordance with the approved Memorandum of Agreement with the Illinois State Historic Preservation Officer (See Exhibit 6 – Approved Memorandum of Agreement), mitigation for these adverse effects is as follows:

- The Illinois Department of Transportation will complete HIER (Historic Illinois Engineering Record) recordation of the properties located at 2 East Water Street and at 14-16 South Main Street.
- The new decorative lighting and sidewalks will match the existing vintage style lighting and landscaping in place around the town square.



- For the Perry County Courthouse, which will be adversely affected through right-of-way acquisition, the IDOT, in coordination with the SHPO, Perry County, and City of Pinckneyville, will develop an interpretative panel regarding the history of the Perry County Courthouse. The panel will be installed at a location inside the courthouse building that is available to the public. The draft content of the panel will be submitted by the IDOT to the SHPO for approval. The IDOT will ensure the final content and plan for the panel is submitted to the SHPO for review and final approval.

PUBLIC INVOLVEMENT AND COORDINATION

Local Community Involvement

Coordination with county and city officials with jurisdiction of the Perry County Courthouse and the property located at 2 East Water Street have been ongoing for over twenty years. Multiple public meetings have occurred over this time to address traffic safety and mobility and pedestrian safety around the town square. Issues with loss of parking and potential displacements of residences and businesses inevitably delayed progression of viable solutions. On October 26, 2017, a meeting was held with Pinckneyville city officials where they discussed the potential to utilize vacant lots and locations of buildings proposed for demolition to develop a solution to the existing traffic problems. They reiterated their desire to minimize impacts to active businesses, parking, and residences. An open house public meeting was held on September 12, 2018 to present potential traffic solutions (including potential impacts to historic properties) and gather comments from the public. These outreach coordination efforts resulted in the decision to select Alternative 3C since the impacts to local businesses would be minimal. No public opposition occurred with this alternative selection. No comments against this undertaking or the adverse effect were received.

SHPO Coordination

The IHPA houses the Illinois State Historic Preservation Officer and is the official with jurisdiction consulted. The FHWA, IDOT, and the IHPA have coordinated with the City of Pinckneyville to develop mitigation commitments for impacts to historic resources. The previous section describes these mitigation options as developed in the Memorandum of Agreement. In the MOA, the SHPO states that the IHPA supports the draft MOA prepared for purposes of Section 106 of the National Historic Preservation Act of 1966, as amended, and that they will continue to work with the Illinois Department of Transportation and the Federal Highway Administration as the project moves forward in order to ratify a MOA that satisfies the intent and purpose of sections 106 and 4(f). The MOA also indicates that the Advisory Council on Historic Preservation (ACHP) stated that their participation in the consultation to resolve adverse effects associated with this project is not needed.

In addition, as previously stated, and MOA was signed in June 2020 by the Federal Highway Administration, the Illinois Department of Transportation, and the Illinois State Historic Preservation Officer regarding the realignment of Illinois Route 127 in the City of Pinckneyville, Perry County, Illinois. This MOA noted the adverse impacts to the Perry County Courthouse (#1), the former Odd Fellows Building (#2), and the Knights of Pythias building (#3). No response was received from the State Historic Preservation Society after its 30 day review period of the draft copy.

Formal Coordination

On March 22, 2021, formal letters were submitted to the U.S. Department of the Interior (Office of Environmental Policy and Compliance) and to the Illinois State Historic Preservation Office. On July 1, 2021, the Department of the Interior provided a response to the letter concurring with the determinations of the draft report. The Illinois State Historic Preservation Office did not submit a response. This documentation is provided in Exhibit 7.

CONCLUSION

Since there were no feasible and prudent alternatives which avoided the use of Section 4(f) land, Alternative 3C was determined to be a feasible and prudent alternative with the least harm on the Section 4(f) resources after considering mitigation to the Section 4(f) resources. Mitigation measures were approved through an MOA with the Illinois State Historic Preservation Office to address adverse impacts to the 4f properties which included the Perry County Courthouse, the Odd Fellows building, and the Knights of Pythias building.

Based upon the above considerations, there is no feasible and prudent alternative to the use of land from the Alternative 3C (which affects the Perry County Courthouse, the Odd Fellows building, and the Knights of Pythias Building) and the proposed action includes all possible planning to minimize harm to the properties affected by Alternative 3C resulting from such use.

Exhibit 1

Location Map of the Study Area

EXHIBIT 1 LOCATION MAP

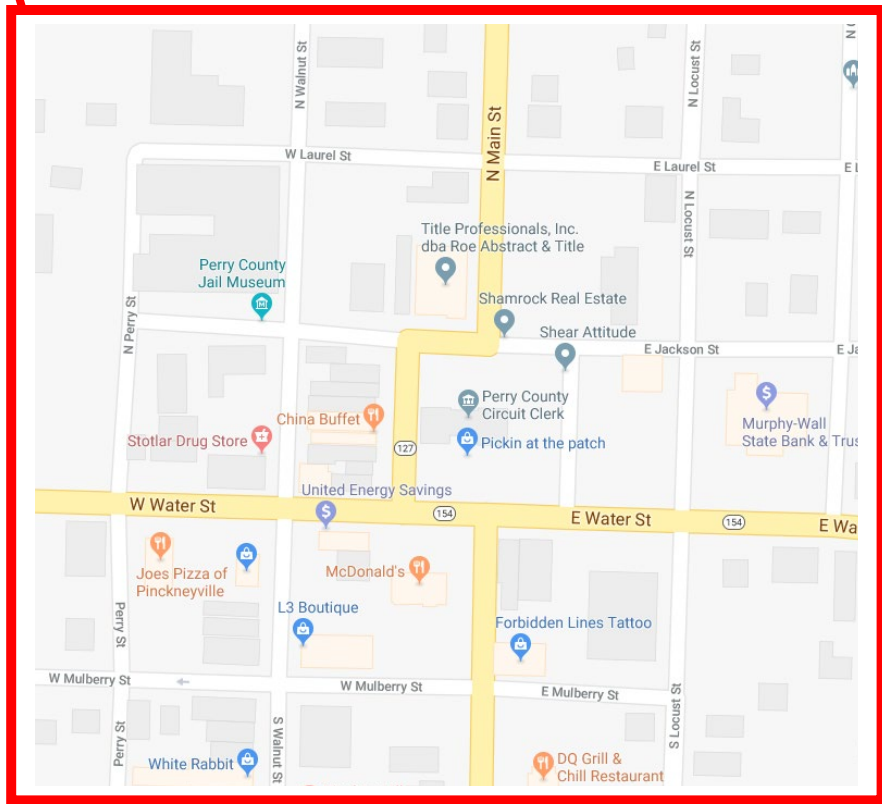
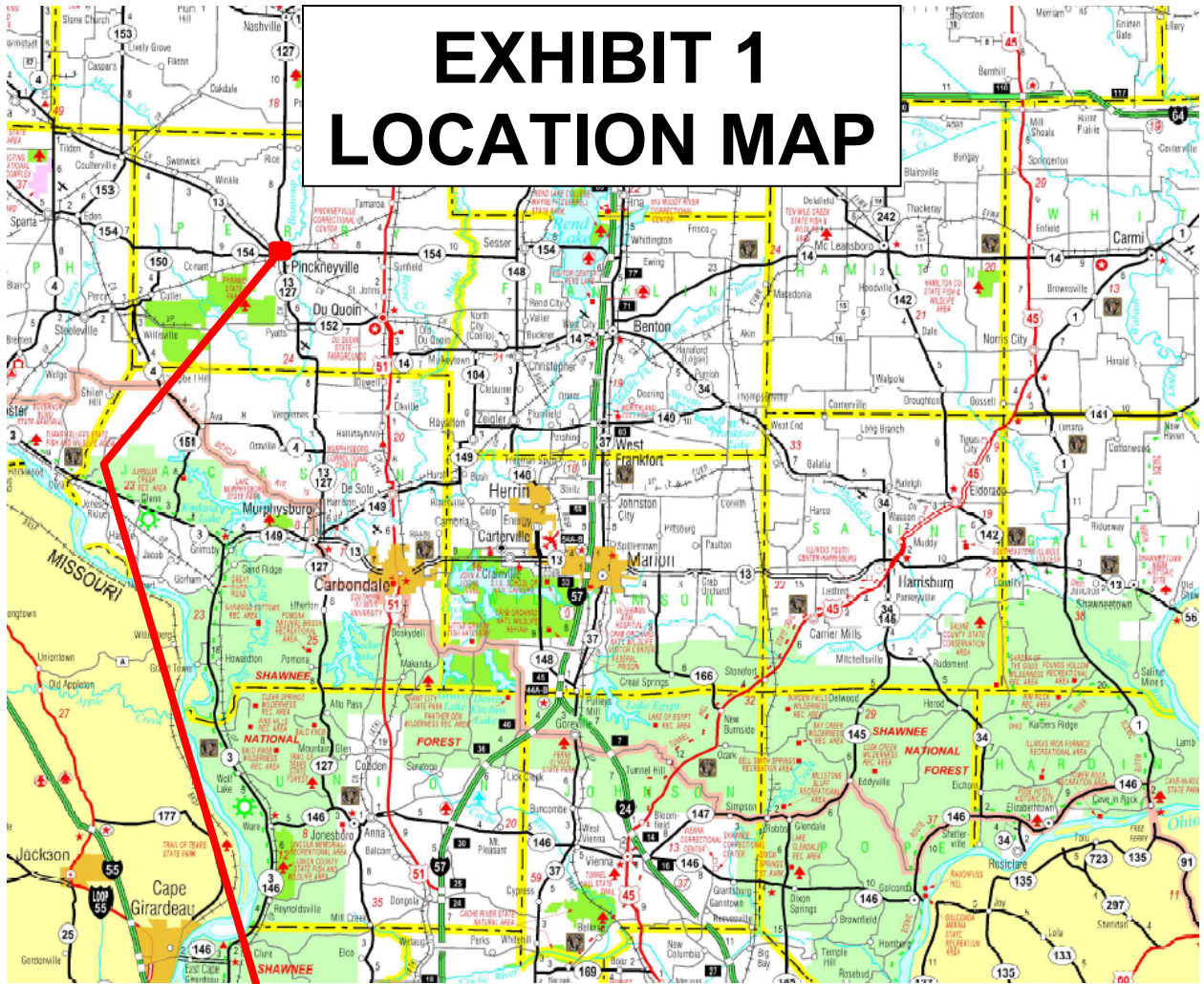


Exhibit 2
Crash Summary Data

Exhibit 3

Map of 4(f) Property Locations

ID	Name	Address
1	Perry Co. Courthouse	3764 State Routes 13-127
2	Odd Fellows Hall	2 East Water Street
3	Knights of Pythias Hall	14-16 South Main Street
4	First National Bank	1 North Main Street
5	Murphy-Wall State Bank	17 West Water Street
6	Residence	202 North Walnut Street
7	Residence	314 North Walnut Street
8	Perry Co. Jail Museum	108 West Jackson Street

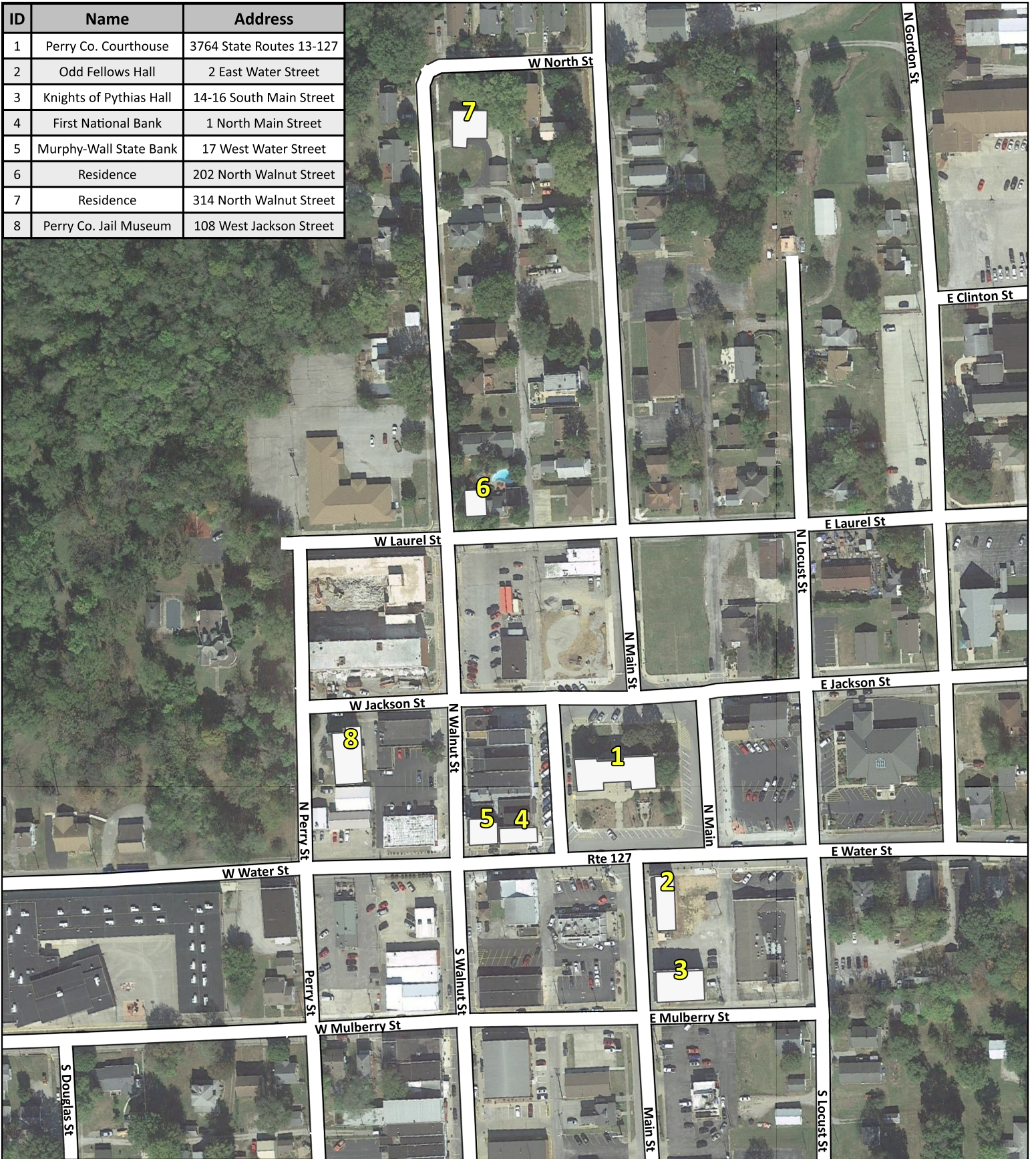
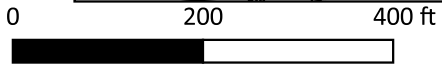


EXHIBIT 3 - 4(f) PROPERTY LOCATION MAP

Illinois Department of Transportation
 Intersection of State Routes 13, 127, and 154
 Pickneyville Square
 Pickneyville, Perry County, Illinois

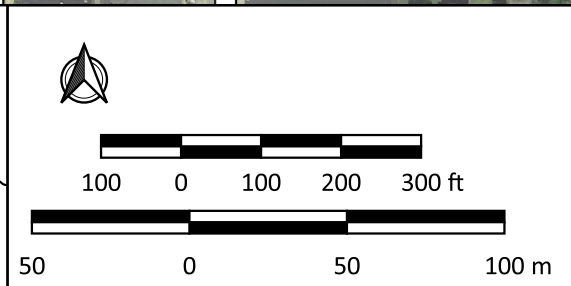
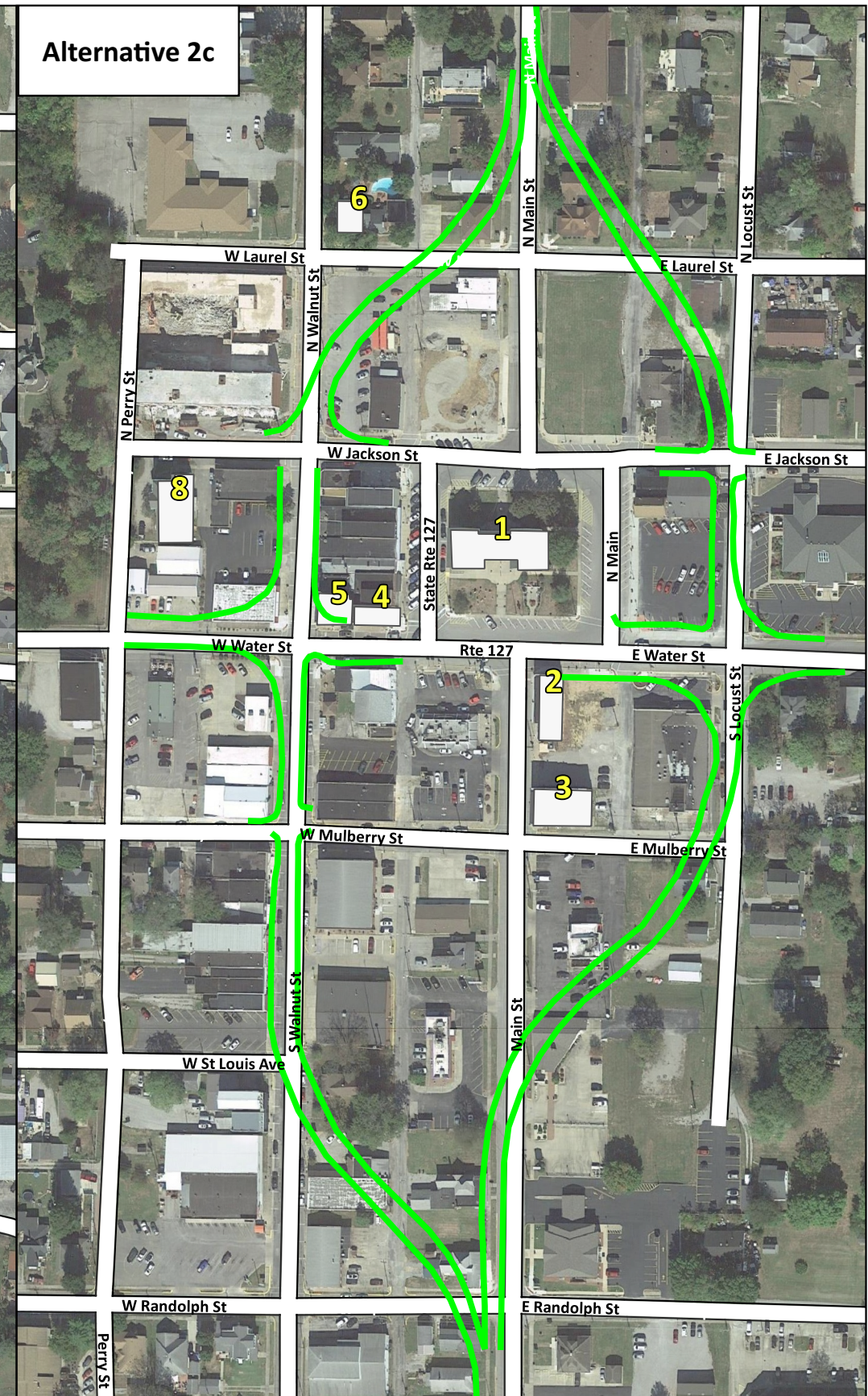
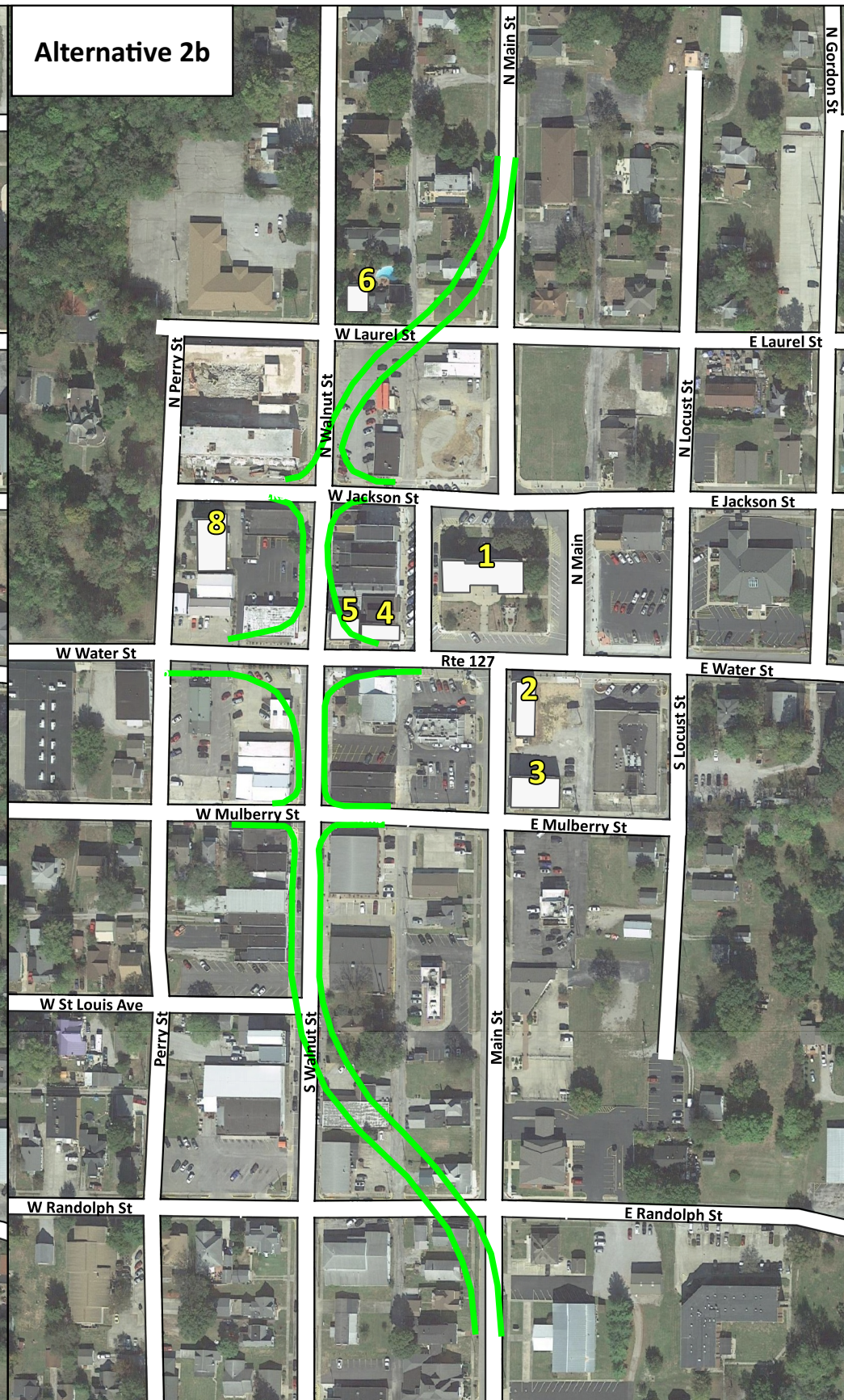
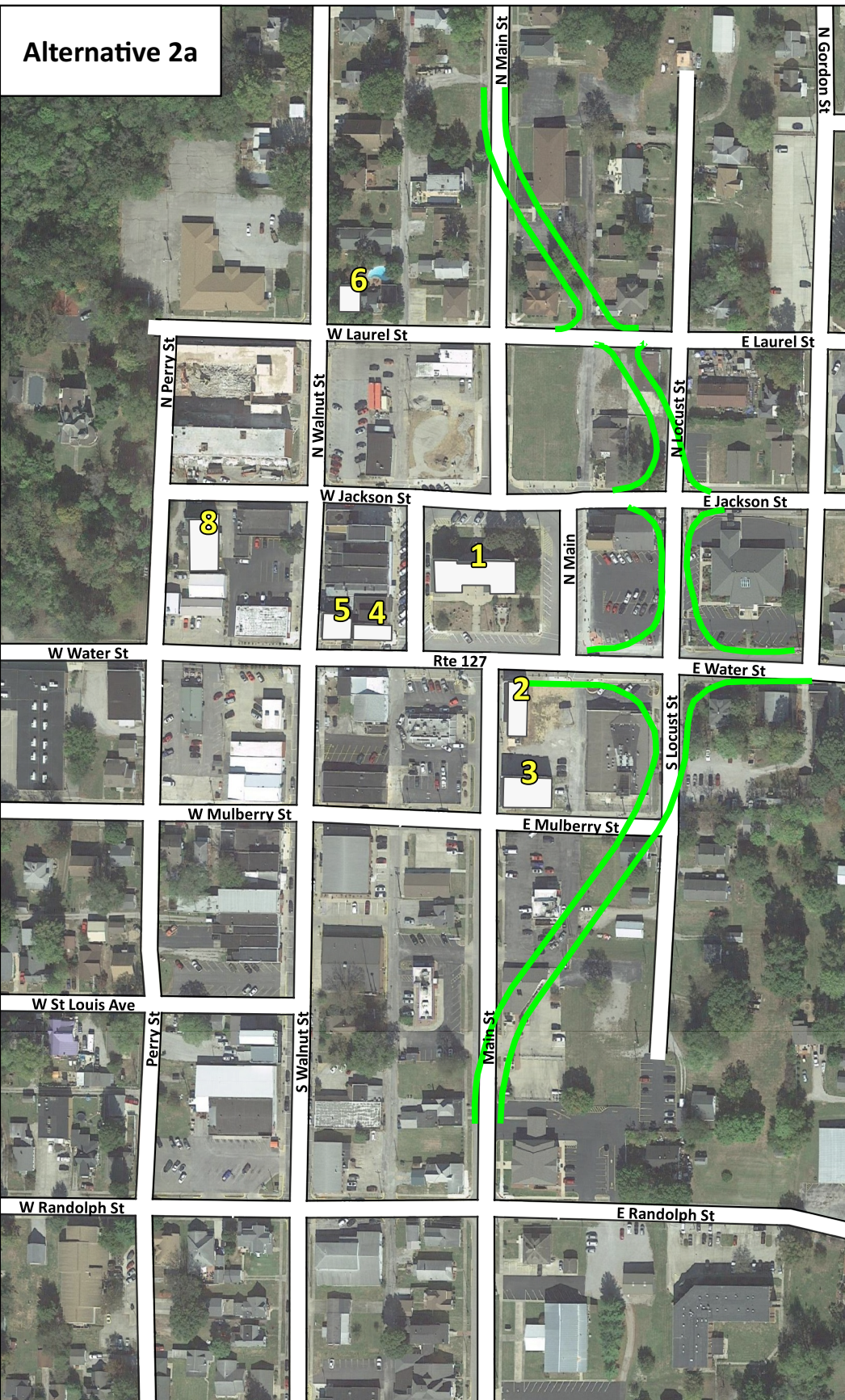
Project Number:	Drafted/Checked:	Date:
		2020-12-23



1 inch : 200 feet

Exhibit 4

Alternative 2 Alignments



LEGEND

ID	Name	Address
1	Perry Co. Courthouse	3764 State Routes 13-127
2	Odd Fellows Hall	2 East Water Street
3	Knights of Pythias Hall	14-16 South Main Street
4	First National Bank	1 North Main Street
5	Murphy-Wall State Bank	17 West Water Street
6	Residence	202 North Walnut Street
8	Perry Co. Jail Museum	108 West Jackson Street

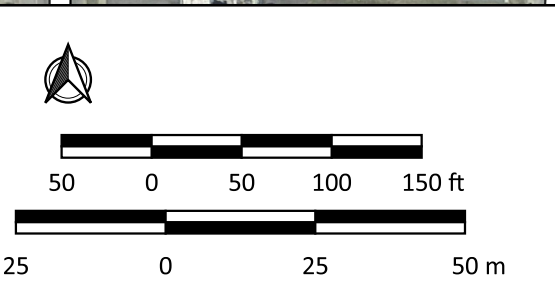
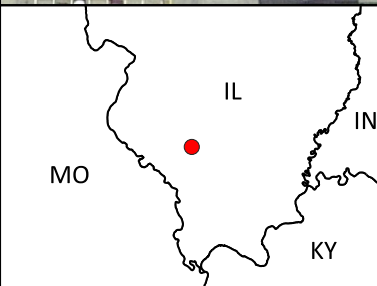
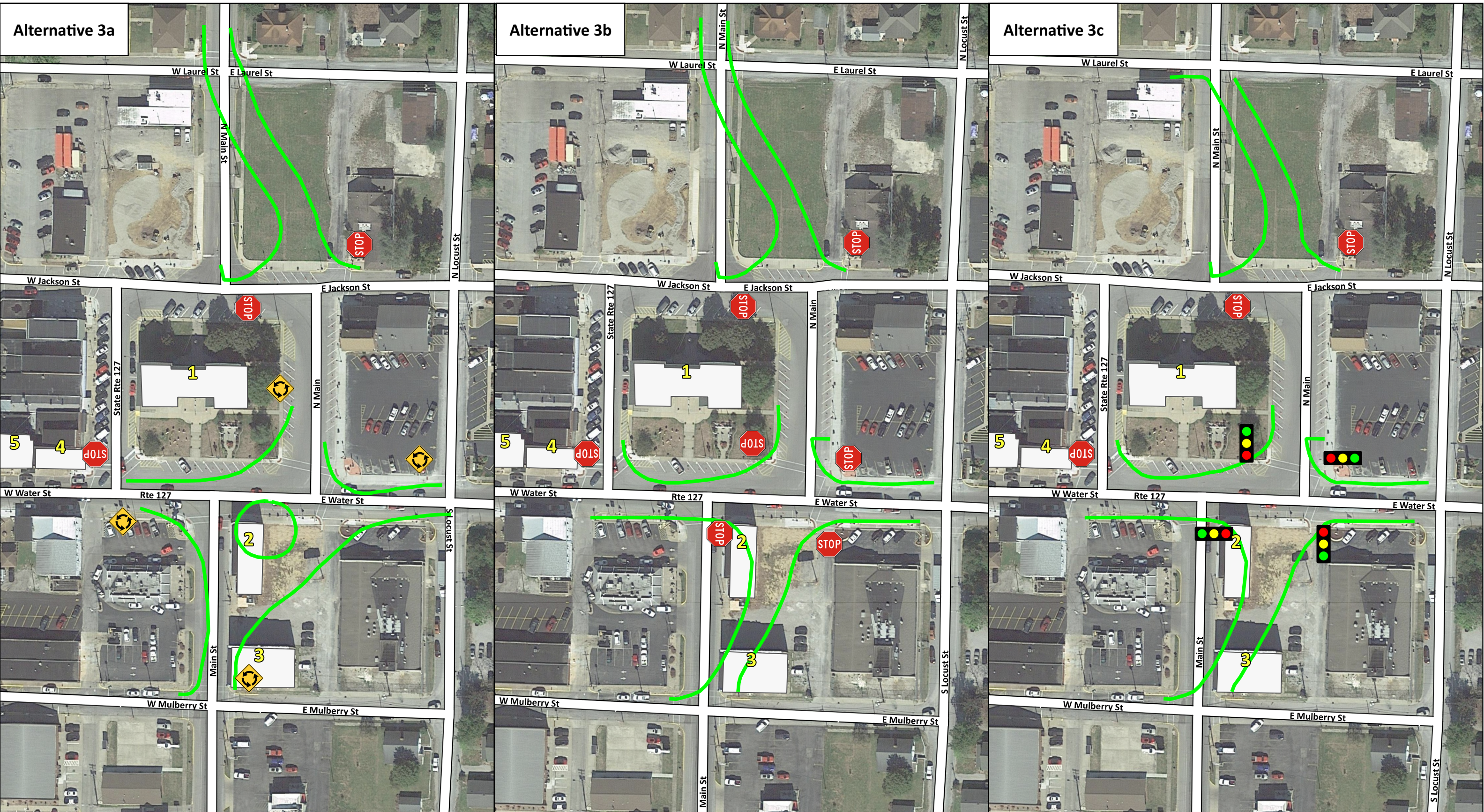
EXHIBIT 4 - ALTERNATIVE ROUTES

Illinois Department of Transportation
Intersection of State Routes 13, 127, and 154
Pickneyville Square
Pickneyville, Perry County, Illinois

Project Number:	Drafted/Checked:	Date:
		2020-12-23

Exhibit 5

Alternative 3 Alignments



LEGEND

ID	Name	Address
1	Perry Co. Courthouse	3764 State Routes 13-127
2	Odd Fellows Hall	2 East Water Street
3	Knights of Pythias Hall	14-16 South Main Street
4	First National Bank	1 North Main Street
5	Murphy-Wall State Bank	17 West Water Street
6	Residence	202 North Walnut Street

EXHIBIT 5 - ALTERNATIVE ROUTES

Illinois Department of Transportation
 Intersection of State Routes 13, 127, and 154
 Pickneyville Square
 Pickneyville, Perry County, Illinois

Project Number:	Drafted/Checked:	Date:
		2020-12-23

Exhibit 6
Approved MOA

**MEMORANDUM OF AGREEMENT
AMONG THE
FEDERAL HIGHWAY ADMINISTRATION
ILLINOIS DEPARTMENT OF TRANSPORTATION
AND
ILLINOIS STATE HISTORIC PRESERVATION OFFICER
REGARDING
THE REALIGNMENT OF ILLINOIS ROUTE 13/127/154
IN THE CITY OF PINCKNEYVILLE, PERRY COUNTY, ILLINOIS**

WHEREAS, the Illinois Department of Transportation (IDOT) plans to realign Illinois Route 13/127 at Illinois Route 154 in the City of Pinckneyville, Perry County, Illinois (Sequence #21308); and

WHEREAS, the Federal Highway Administration (FHWA) may fund the project, thereby making the project an undertaking subject to review under Section 106 of the National Historic Preservation Act (NHPA), 54 U.S.C. § 306108, and its implementing regulations, 36 C.F.R. Part 800; and

WHEREAS, the FHWA has defined the undertaking's area of potential effects (APE) as the footprint of the proposed improvements and the properties abutting the proposed improvements (Exhibit A); and

WHEREAS, the FHWA has determined that the undertaking will have an adverse effect on the Perry County Courthouse, former Odd Fellows Hall at 2 East Water Street, and former Knights of Pythias Hall at 14-16 South Main Street, all of which have been determined eligible for the National Register of Historic Places (NRHP), and the FHWA has consulted with the Illinois State Historic Preservation Officer (SHPO) pursuant to 36 C.F.R. Part 800; and

WHEREAS, the FHWA has determined that the undertaking will not have an adverse effect on historic properties other than those three properties listed above; and

WHEREAS, the FHWA has invited the IDOT to participate in consultation and to become an invited signatory to this agreement; and

WHEREAS, the FHWA and IDOT invited the following Tribes to enter consultation: Kaw Nation, Miami Tribe of Oklahoma, Osage Nation, Peoria Tribe of Indians of Oklahoma, and Ponca Tribe, with the Osage Nation expressing interest in the project; and

WHEREAS, the FHWA and IDOT provided the public opportunities to comments on the undertaking and on the undertaking's adverse effect in notices published in The Southern Illinoisan newspaper and during public meetings held in Pinckneyville on October 26, 2017 and

September 12, 2018. The Perry County Historical Society, City of Pinckneyville, Foundation for the Future of Pinckneyville, and four local businesses (Murphy-Wall State Bank and Trust Company, Pinckneyville Property LLC, Eyecare Properties LLC, and Stuart Morgenstern Law Office), were invited to these meetings and thereby given the opportunity to participate in consultation. No comments against the undertaking or the adverse effect were received.

WHEREAS, the IDOT on behalf of FHWA notified the Advisory Council on Historic Preservation (ACHP) of the adverse effect, March 25, 2020 pursuant to 36 CFR Section 800.6(a)(1), and ACHP declined to enter into consultation in a letter dated April 6, 2020; and

NOW, THEREFORE, the FHWA, IDOT, and SHPO agree that the undertaking shall be implemented in accordance with the following stipulations to take into account the effect of the undertaking on historic properties.

STIPULATIONS

The FHWA in coordination with the IDOT shall ensure that the following measures are carried out:

1. For the former Odd Fellows Hall at 2 East Water Street and of the former Knights of Pythias Hall at 14-16 South Main Street, which will be adversely affected through demolition, the IDOT will complete Historic Illinois Building Survey (HIBS) level III recordation of both properties prior to beginning of demolition activities. The IDOT will submit the draft HIBS (~95%) to the SHPO, and the IDOT must receive written concurrence from the SHPO that the draft HIBS documentation is acceptable prior to IDOT approving demolition of these two buildings. The IDOT will ensure the final HIBS (100%) documentation is submitted to the SHPO for review.
2. For the Perry County Courthouse, which will be adversely affected through right-of-way acquisition, the IDOT, in coordination with the SHPO, Perry County, and City of Pinckneyville, will develop an interpretative panel regarding the history of the Perry County Courthouse. The panel will be installed at a location inside the courthouse building that is available to the public. The draft content of the panel will be submitted by the IDOT to the SHPO for approval. The IDOT will ensure the final content and plan for the panel is submitted to the SHPO for review and final approval.

3. DURATION

This agreement will be null and void if its stipulations are not carried out within five (5) years from the date of its execution. At such time, and prior to work continuing on the undertaking, the FHWA shall either (a) execute an agreement pursuant to 36 C.F.R. § 800.6, or (b) request, take into account, and respond to the comments of the ACHP under 36 C.F.R. § 800.7. Prior to such time, the FHWA may consult with the other signatories to reconsider the terms of the agreement and amend it in accordance with Stipulation 6 below. The FHWA shall notify the signatories as to the course of action it will pursue.

4. POST-REVIEW DISCOVERIES

If potential historic properties are discovered or unanticipated effects on historic properties found, the FHWA shall make reasonable efforts to avoid, minimize, or mitigate adverse effects to such properties and follow the requirements of 36 CFR Section 800.13(b).

5. DISPUTE RESOLUTION

Should any signatory to this agreement object at any time to any actions proposed or the manner in which the terms of this agreement are implemented, the FHWA shall consult with such party to resolve the objection. If the FHWA determines that such objection cannot be resolved, the FHWA will:

A. Forward all documentation relevant to the dispute, including any timely advice or comments regarding the dispute from the other signatories the FHWA's proposed resolution, to the ACHP. The ACHP shall provide the FHWA with its advice on the resolution of the objection within thirty (30) days of receiving adequate documentation. Prior to reaching a final decision on the dispute, the FHWA shall prepare a written response that takes into account any timely advice or comments regarding the dispute from the ACHP and signatories and provide them with a copy of this written response. The FHWA will then proceed according to its final decision.

B. If the ACHP does not provide its advice regarding the dispute within the thirty (30) day time period the FHWA may make a final decision on the dispute and proceed accordingly. Prior to reaching such a final decision, the FHWA shall prepare a written response that takes into account any timely comments regarding the dispute from the signatories to this agreement and provide them and the ACHP with a copy of such written response.

C. The FHWA's responsibility to carry out all other actions subject to the terms of this agreement that are not the subject of the dispute remain unchanged.

6. AMENDMENTS

This agreement may be amended when such an amendment is agreed to in writing by all signatories. The amendment will be effective on the date a copy signed by all of the signatories is filed with the ACHP.

7. TERMINATION

If any signatory to this agreement determines that its terms cannot be carried out, that party shall immediately consult with the other parties to attempt to develop an amendment per Stipulation 6, above. If within thirty (30) days an amendment cannot be

reached, any signatory may terminate the agreement upon written notification to the other signatories.

Once the agreement is terminated, and prior to work continuing on the undertaking, the FHWA must either (a) execute an agreement pursuant to 36 CFR § 800.6, or (b) request, take into account, and respond to the comments of the ACHP under 36 CFR § 800.7. The FHWA shall notify the signatories as to the course of action it will pursue.

EXECUTION of this agreement by the FHWA, IDOT and SHPO and implementation of its terms evidence that the FHWA has taken into account the effects of this undertaking on historic properties and afforded the ACHP an opportunity to comment.

[Signature Pages Follow]

**MEMORANDUM OF AGREEMENT
AMONG THE
FEDERAL HIGHWAY ADMINISTRATION
ILLINOIS DEPARTMENT OF TRANSPORTATION
AND
ILLINOIS STATE HISTORIC PRESERVATION OFFICER
REGARDING
THE REALIGNMENT OF ILLINOIS ROUTE 127
IN THE CITY OF PINCKNEYVILLE, PERRY COUNTY, ILLINOIS**

Signatory

ILLINOIS STATE HISTORIC PRESERVATION OFFICER

By:  Date: June 25, 2020

Print Name: Robert F. Appleman

Title: Deputy State Historic Preservation Officer

**MEMORANDUM OF AGREEMENT
AMONG THE
FEDERAL HIGHWAY ADMINISTRATION
ILLINOIS DEPARTMENT OF TRANSPORTATION
AND
ILLINOIS STATE HISTORIC PRESERVATION OFFICER
REGARDING
THE REALIGNMENT OF ILLINOIS ROUTE 127
IN THE CITY OF PINCKNEYVILLE, PERRY COUNTY, ILLINOIS**

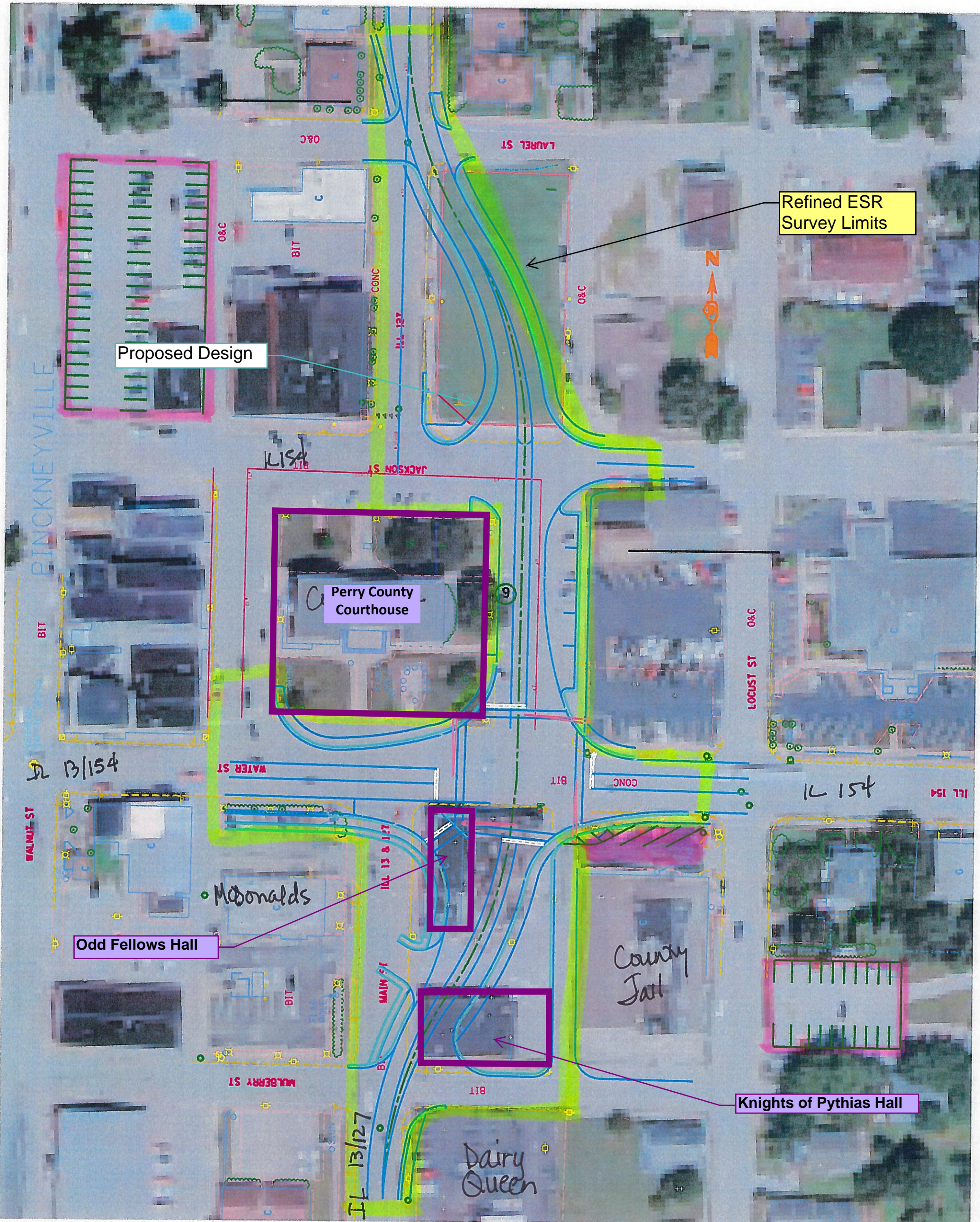
Invited Signatory

ILLINOIS DEPARTMENT OF TRANSPORTATION

Signature:  Date: 06-17-20

Name: KETH ROBERTS

Title: ACTING REGION 5 ENGINEER



Proposed Design

Refined ESR Survey Limits

Perry County Courthouse

Odd Fellows Hall

Knights of Pythias Hall

Note: APE defined as the properties encompassing and adjoining the ESR Survey Limits

Exhibit A
APE Map showing Historic Properties
Realignment of IL 13/127/154
Pinckneyville, Perry Co., IL
IDOT Seq. 21308

Exhibit 7

Formal Coordination Documentation



IN REPLY REFER TO:

United States Department of the Interior

OFFICE OF THE SECRETARY
Office of Environmental Policy and Compliance
Custom House, Room 244
200 Chestnut Street
Philadelphia, Pennsylvania 19106-2904

July 1, 2021

9043.1
ER21/0195

Mr. Matt Fuller
Federal Highway Administration
Illinois Division
3250 Executive Park Drive
Springfield, Illinois 62703

RE: Draft Section 4(f) Evaluation – Mobility Improvements to Support Illinois Route 13, 127, and 154, City of Pinckneyville, Perry County, Illinois

Dear Mr. Fuller:

The Department of the Interior (Department) has reviewed the draft Section 4(f) evaluation for the Illinois Route 13, 127, and 154 Mobility Improvements Project in Perry County, Illinois. The document considers effects under Section 4(f) of the Department of Transportation Act of 1966 (codified at 49 U.S.C. 303) associated with the project. Project sponsors are the Illinois Department of Transportation (IDOT) and the Federal Highway Administration (FHWA).

Background Information

IDOT is proposing several improvements to roadways within and adjacent to Pinckneyville, Illinois to improve traffic operations for motorist and pedestrian safety. The project would construct a 4-way fully signalized intersection in the southeast corner of Illinois Routes 13, 127 and 154, known as the Pinckneyville Square in Pinckneyville, Illinois. Signalized pedestrian crossings would be provided for all legs of the intersection.

Section 4(f) Comments

Section 4(f) applies to both historic and recreational resources impacted by the project. There are no public parks and recreation areas within the project area. However, eight historic properties in the project area are listed, or eligible for listing, in the National Register of Historic Places (NRHP). There are no National Historic Landmarks (NHLs) in the project area.

Historic Properties and Assessment of Effect

FHWA has determined the undertaking would have an adverse effect on three historic properties, two of which would be demolished:

- Perry County Courthouse: project would not affect the structure of the building but would convert a small portion of the building to transportation use.
- Odd Fellows Building: project would demolish the structure.
- Knights of Pythias Buildings: project would demolish the structures.

These properties have local and state significance and have been determined eligible for listing in the NRHP. Project sponsors evaluated seven alternatives, and FHWA has determined there is no feasible and prudent avoidance alternative to adversely affecting these properties.

Mitigation Measures

A Memorandum of Agreement (MOA) between IDOT, FHWA, and the Illinois State Historic Preservation Office (SHPO) was signed in June 2020 to mitigate adverse effects to these historic properties.

The following compensatory mitigation measures are identified in the MOA:

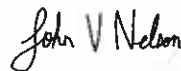
- IDOT will complete HIER (Historic Illinois Engineering Record) recordation of the properties located at 2 East Water Street and at 14-16 South Main Street.
- New decorative lighting and sidewalks will match the existing vintage style lighting and landscaping that is already in place around the town square.
- IDOT will develop an interpretative panel on the history of the Perry County Courthouse, in coordination with the SHPO, Perry County, and City of Pinckneyville. The panel will be installed at a location inside the courthouse building that is open to the public.

The Department concurs with the determination that the proposed alternative would constitute an adverse effect to these historic properties under Section 106 of the National Historic Preservation Act, and also concurs with FHWA's determination that there is no feasible or prudent avoidance alternative to the Section 4(f) use.

The Department has a continuing interest in working with the FHWA to ensure impacts to resources of concern are adequately addressed. For issues concerning Section 4(f) resources, please contact James Lange, Planning and Compliance Program Manager, Regions 3, 4, and 5, National Park Service, 601 Riverfront Drive, Omaha, Nebraska 68102, or by email at James_Lange@nps.gov.

We appreciate the opportunity to provide these comments.

Sincerely,



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John V. Nelson
Regional Environmental Officer