UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 5
77 WEST JACKSON BOULEVARD
CHICAGO, IL 60604-3590

MAY 0 2 2011

REPLY TO THE ATTENTION OF:

E-19J

Norman Stoner, P.E.
Division Administrator
Federal Highway Administration
3250 Executive Park Drive
Springfield, Illinois 62703

Re: **Comments on the Final Environmental Impact Statement for Illinois Route 336 from Macomb Bypass to I-474 Peoria, CEQ# 20110107**

Dear Mr. Stoner:

In accordance with Section 309 of the Clean Air Act and the National Environmental Policy Act (NEPA), the U.S. Environmental Protection Agency (EPA) has reviewed the proposed Final Environmental Impact Statement (FEIS) for Illinois Route 336 (IL 336) from the proposed Macomb Bypass in McDonough County to I-474 in Peoria County, Illinois. The project proposes to link state highway systems, improve transportation continuity, address travel efficiency and thereby promote economic stability in this region.

EPA has participated in this project development, including early scoping comments, concurrences at merged NEPA / Clean Water Act Section 404 meetings, and our letter of comments for this project Draft EIS (DEIS) on August 24, 2009.

Our comments on the DEIS included requests for additional Purpose and Need data to clarify how the region would be served by this new roadway. We commended the extensive efforts to reduce alternative impacts, and offered several minor considerations. Our concerns for environmental impacts included air quality during construction, clarification of wetland mitigation commitments, level of stream and floodplain erosion considered, and clarification of forest impact mitigation.

We appreciate that the FEIS is exemplary in clearly and directly responding to not just our comments, but all public comments regarding the project DEIS. We acknowledge the added data and discussions in Purpose and Need regarding: the amount and nature of traffic anticipated to be served, the indications of industrial benefits, and the emphasis on time saving for traffic serving these industries as well as regional travelers in general.

Recycled/Recyclable • Printed with Vegetable Oil Based Inks on 100% Recycled Paper (50% Postconsumer)

We applaud the work done by the project team through alternative modifications, to avoid and minimize all types and sizes of impacts to the degree practicable. The "fine tuning" between the DEIS and the FEIS that protected additional resources and addressed public concerns are particularly notable.

We appreciate the responses to our environmental impacts concerns and the presentation of mitigations, but retain several concerns on these points, as discussed below.

ENVIRONMENTAL IMPACTS

AIR QUALITY

We acknowledge the FEIS assertions that the diesel farm implements in the project area will probably generate more emissions than the construction equipment to be used for this project; that the project is located in an attainment area not requiring emission reductions; and that the majority of the 60-mile route is open space. However, there are several communities along the corridor, and many construction vehicles will be concentrated at construction sites. Clean diesel strategies would reduce exposures to construction workers and residents of these communities. Therefore, we retain our recommendation that at least some of the following measures be implemented to reduce toxic and particulate diesel emissions:

(a) idling limits;
(b) retrofitting off-road construction equipment including repower or engine upgrades;
(c) using ultra-low-sulfur fuels for all equipment;
(d) limiting the age of on-road vehicles in construction projects to 1998 and newer and 1996 and newer for off-road equipment;
(e) diesel particulate traps and oxidation catalysts;
(f) using existing power sources or clean fuel generators rather than temporary power generators; and
(g) encouraging the use of off-road equipment that meets the Tier 3 standards.

WETLANDS

We commend FHWA and IDOT for reducing the total wetlands impacted by this 60 mile project to 15.09 acres with only 4.11 acres being destroyed; 17.55 acres of mitigation credits are to be used at an out-of-basin bank.

STREAMS AND FLOODPLAINS

We appreciate the added floodplain information in the Floodplain Table 3-43. We continue to recommend that 100-year flood levels be considered in design of the Spoon River and Copperas Creek crossings.

FORESTS

Although the letter responding to our comments in Appendix D states that IDOT plans to follow-up its tree planting mitigation for 5 years, the mitigation summary section 3.21.6 only specifies a 2-year check on the tree plantings. We recommend the ROD clearly commit either the IDOT or a caretaker, such as a local government or the Harper-Rector Woods or similar adjacent nature preserves, to assure the success of the reforestation for at least 10 years. We also encourage continued effort to locate sites to replace the full 157 acres of woodland impacted and commit to these sites in the ROD. Perhaps out-of-basin sites could be considered such as associated with other IDOT projects or by expanding existing state preserves, parks or refuges.

We appreciate the opportunity to participate in this project development. If you have any questions, or wish to discuss our comments further, please contact me or Norm West of my staff at (312)-353-5692 or at west.norman@epa.gov.

Sincerely,

Kenneth A. Westlake
Chief, NEPA Implementation Section
Office of Enforcement and Compliance Assurance

Cc: Joseph E. Crowe
Deputy Director, Region 3 Engineer
Illinois Department of Transportation
401 Main Street
Peoria, Illinois 61602-1111