Draft Environmental Assessment
with
Finding of No Significant Impact (FONSI)

Environmental Infrastructure Assistance Project:
Water and Wastewater Infrastructure Improvements
Sanitary Sewer Trunkline Project
Cahokia Heights, St. Clair County, Illinois

July 2022

U.S. Army Corps of Engineers
St. Louis District
Regional Planning & Environmental Division North
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1 INTRODUCTION

The St. Louis District, U.S. Army Corps of Engineers has proposed to enter into a Project Partnership Agreement with the City of Cahokia Heights for work to construct the proposed Sanitary Sewer Trunkline project (project). In this agreement, the St. Louis District proposes to provide Federal assistance to the City of Cahokia Heights for the rehabilitation of sanitary sewer trunkline in Cahokia Heights, IL. The proposed project would be carried out under Section 219 – Environmental Infrastructure program (see Section 1.1).

This Environmental Assessment (EA) has been prepared in accordance with the National Environmental Policy Act (NEPA) and the Council on Environmental Quality's Regulations (40 Code of Federal Regulations §1500-1508, as reflected in the USACE Engineering Regulation 200-2-2).

1.1 AUTHORITY

Construction assistance or implementation for this project is authorized by Section 219 (f) (55) of the Water Resource Development Act (WRDA) of 1992 (Public Law 102-580), as amended by Section 108 (b) (55) of Consolidated Appropriations Act 2001 (Public Law 106-554) and Section 352 (b) (3) of WRDA 2020 (Public Law 116-260). Section 219 of the Water Resources Development Act of 1992, Environmental Infrastructure, as amended (hereinafter "Section 219") authorizes the Secretary of the Army to provide assistance to non-Federal interests for carrying out water-related environmental infrastructure and resource protection and development projects including wastewater treatment and related facilities and water supply, storage, treatment, and distribution facilities. The purpose of the program is to provide Federal assistance to State and local governments in carrying out non-Federal water-related infrastructure projects.

1.2 PROJECT LOCATION

The proposed project area is generally located within Cahokia Heights, IL major collector streets, including Jerome Lane, Range Lane, East 5th Street, Water Street, and Levin Drive (Figure 1). Portions of the proposed project intersect and cross under major transportation features, including state highways (IL Rt. 157 and IL Rt. 3) and a major regional railroad (Union Pacific RR).

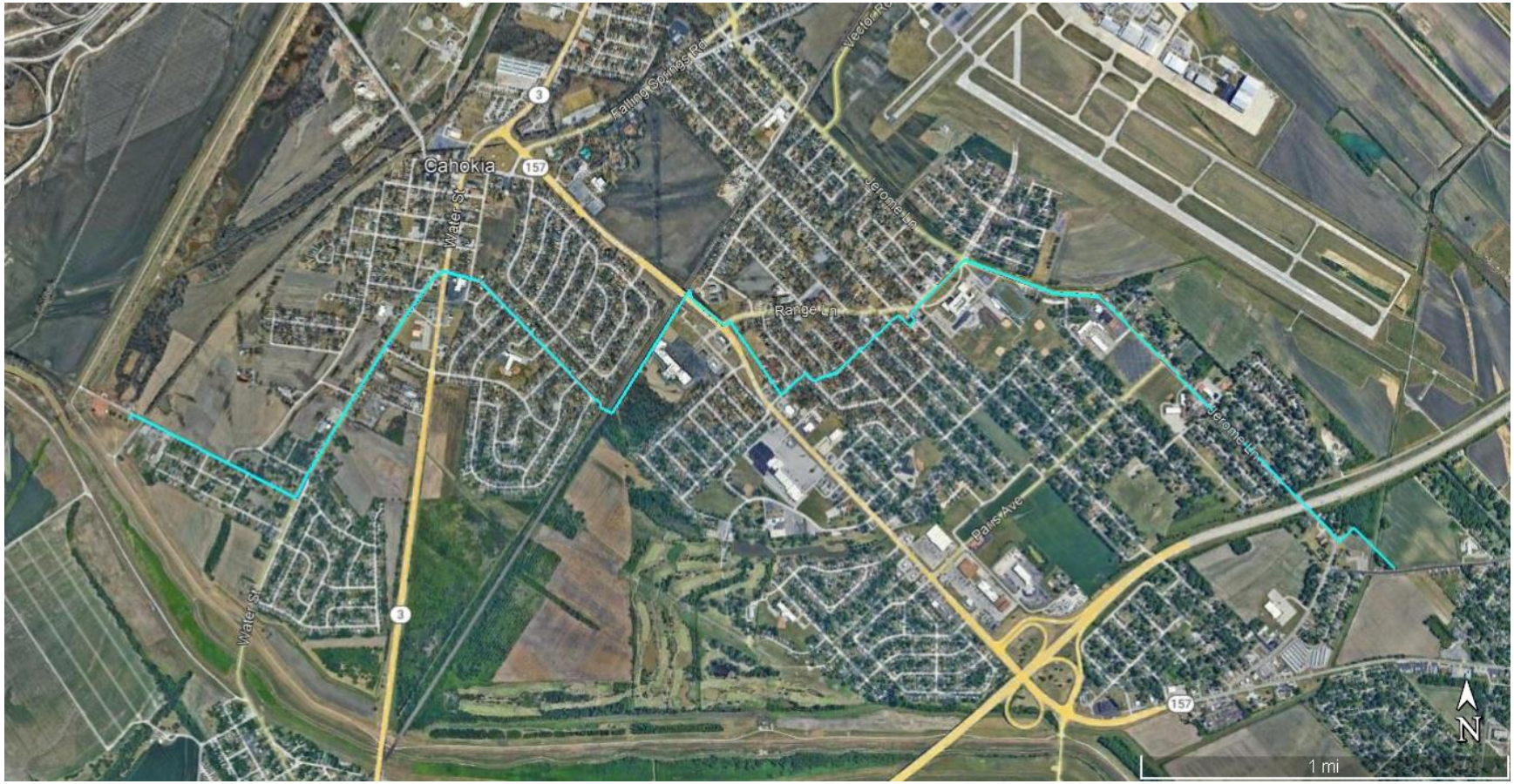

Figure 1. Approximate location of the proposed project area (blue line) in Cahokia Heights, Illinois.

1.3 PURPOSE AND NEED

The purpose of the proposed project is to assist this minority and low-income community with vital infrastructure improvements. Cracks, settling, and other disturbances that develop over time deteriorate sanitary sewer pipelines and other conveyance structures that comprise wastewater collection systems. These deteriorating conditions increase the amount of inflow and infiltration and decrease the system's overall capacity, resulting in backups into homes and overflows into receiving waters. This bypass of untreated wastewater adversely affects human health as well as impair the usage and degrade the water quality of the receiving waters. This is the case for Cahokia Heights and is subject to an USEPA Region 5 Administrative Order on Consent dated August 21, 2021 as a result of alleged Clean Water Act violations identified during ongoing investigation of sanitary sewer overflows in Cahokia Heights.

The proposed project would aim to correct pipe deficiencies, restore structural stability, and ensure long-term reliability of wastewater transport, in terms of reduction in infiltration of groundwater into the sewer system, the consequential costs of pumping and treating waters mixed with sewage, and extending the operable life of the wastewater treatment facility.

2 ALTERNATIVES CONSIDERED

This section of the EA describes the alternatives considered and summarizes the alternatives in terms of their environmental impacts. An Action Alternative (Sewer Rehabilitation Alternative) was developed by identifying construction measures needed to rehabilitate sanitary sewer trunkline. A No Action Alternative is also considered for all areas under consideration.

2.1 NO ACTION ALTERNATIVE

Under this alternative, no Federal assistance would be provided and the sanitary sewer trunkline system would remain in its current condition. Residents within the proposed project area would continue to be at a high risk for serious human and environmental health hazards resulting from the associated comprised sanitary sewer systems. Associated risk of human exposure to harmful viruses, bacteria, and parasites would exist under this alternative.

2.2 SANITARY SEWER REHABILITATION ALTERNATIVE

Under this alternative, approximately 3.5 miles of sanitary trunk sewer (21, 24, 30-in pipe; Figure 2) would be rehabilitated by cleaning, televising, and installing cured-in-place pipe (CIPP) in the main sanitary sewer trunkline conveying flow through Cahokia Heights. Cleaning and televising the sewer ensures proper liner installation and identifies major structural issues. CIPP lining corrects pipe deficiencies (cracks and breaks), restores structural stability, and ensures long-term reliability of this main conduit for wastewater transport. Construction would initiate near the intersection of Jerome Lane and Mousette Lane and continue in a southwesterly direction to the Levin Drive Sanitary Pump Station. This alternative would reduce infiltration of groundwater into the sewer system, reduce the subsequent costs of pumping and treating waters mixed with sewage, and extends the operable life of the wastewater treatment facility.

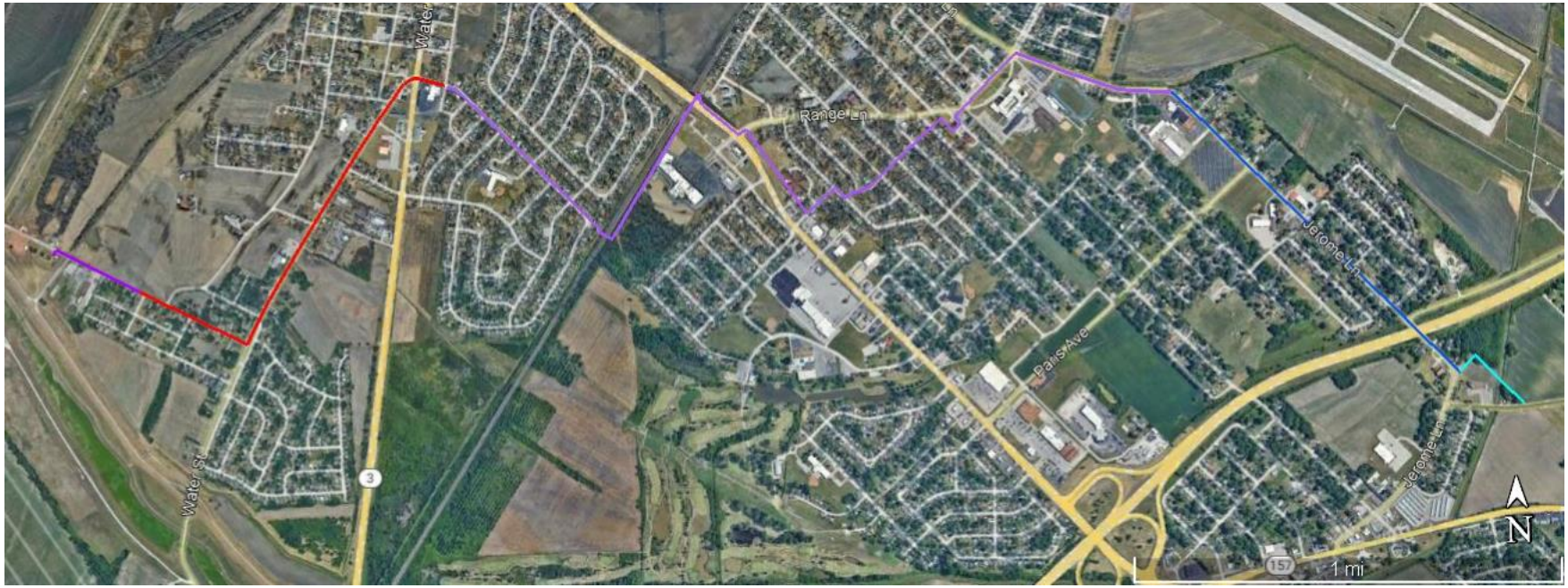

Figure 2. Proposed rehabilitation of 30 in (purple), 24 in (dark blue), and 21 in (light blue) sanitary sewer trunkline in Cahokia Heights, IL. Approximately 1.08 mi of 30 in pipe was lined previously (red).

3 AFFECTED ENVIRONMENT & ENVIRONMENTAL CONSEQUENCES

This section describes existing conditions and potential environmental consequences in the proposed project area, which are referred to under the NEPA process as the Affected Environment and Environmental Consequences, respectively. The resources described in this section are those recognized as significant by laws, executive orders, regulations, and other standards of national, state, or regional agencies and organizations; technical or scientific agencies, groups, or individuals; and the general public.

3.1 HYDROLOGY AND HYDRAULICS

3.1.1 Existing Conditions

The Cahokia Heights leveed area is underlain by a major rock aquifer and sand and gravel aquifer. In order to protect groundwater quality in this area, the Southern Groundwater Protection Planning Region was established by the IEPA in Madison, Monroe, St. Clair, and Randolph Counties.

The Metro East Sanitary District / Chain of Rocks East Levee System protects Cahokia Heights from Mississippi River riverfront for its entire length. Small man-made impoundments/lake-like water bodies occur in the levee interior. Water quality in the levee interior and the Mississippi River can be greatly affected by sanitary sewer systems.

Sanitary sewer trunkline within Cahokia Heights has experienced failures over recent years, and conventional open excavation to repair these failures require large amounts of care of flow (i.e. bypass pumping), dewatering of groundwaters, and safety issues within close proximity to major highways and streets. Cracks, settling, and other disturbances that develop over time deteriorate sanitary sewer pipelines and other conveyance structures that comprise wastewater collection systems. These deteriorating conditions increase the amount of inflow and infiltration entering the system, especially during periods of wet weather. Increased inflow and infiltration levels create an additional hydraulic load on the system and thereby decrease its overall capacity, resulting in backups into homes and overflows into receiving waters. This bypass of untreated wastewater, known as a Sanitary Sewer Overflow, adversely affects human health as well as impair the usage and degrade the water quality of receiving waters. The sanitary sewer trunkline within the proposed project area ends at the Levin Drive Sanitary Pump Station, adjacent to Prairie du Pont Creek, Dead Creek, and the Mississippi River.

3.1.2 No Action

Under the No Action Alternative, cracks, settling, and other disturbances that develop over time would continue to deteriorate sanitary sewer pipelines and other conveyance structures that comprise wastewater collection systems. These deteriorating conditions increase the amount of inflow and infiltration and decrease the system's overall capacity, resulting in backups into homes and overflows into receiving waters.

3.1.3 Sanitary Sewer Rehabilitation

The rehabilitation of sanitary sewer trunkline via CIPP lining would correct pipe deficiencies (cracks and breaks), restore structural stability, and ensure long-term reliability of this main conduit for wastewater transport. This process would ensure proper liner installation and to identify any structural issues needing additional attention. Completing the CIPP of the trunkline would reduce infiltration of groundwater into the sewer system, lessen the subsequent costs of pumping and treating those waters mixed with sewage, and extend the operable life of the American Bottoms Regional Wastewater Treatment Plant.

3.2 WATER QUALITY

3.2.1 Existing Conditions

The proposed project area is within the Prairie du Pont Creek-Mississippi River HUC12 watershed. The Illinois Environmental Protection Agency (IEPA) samples surface waters within HUC12 watersheds on a 4-year rotation to meet Section 305(b) requirements of the Clean Water Act (1976). IEPA reports the resource quality of its waters in terms of the degree to which the beneficial uses of those waters are supported and the reasons (i.e., causes and sources) beneficial uses may not be supported. According to the IEPA (2022), impaired uses and causes for impairment (within parentheses) for these waterways include:

1. Mississippi River – fish consumption (mercury, polychlorinated biphenyls), primary contact recreation (fecal coliform), and public water supplies (manganese);
2. Prairie du Pont Creek – aquatic life (cause unknown);
3. Canal #1 – aquatic life (total phosphorus);
4. Frank Holton State Recreation Area – fish consumption (aldrin, dieldrin, endrin, heptachlor, mirex, PCBs, toxaphene);
5. Stookey Creek – aquatic life (total phosphorus).

3.2.2 No Action

Under the No Action Alternative, degraded sanitary sewer trunkline may backup untreated wastewater and overflows into receiving waters such as the Mississippi River or into low-lying areas of the Metro East Sanitary District. The unknown types and concentrations of contaminants that are exposed to the environment have the potential to negatively impact water quality of the receiving surface or groundwaters. The discharge of untreated sewage water during rain events could lead to increases in fecal coliform bacteria in the Mississippi River and other nearby aquatic habitats. Other contaminants from sanitary sewer overflow discharges could include high concentrations of suspended solids, biochemical oxygen demand, oils and grease, toxins, nutrients, floatables, and pathogenic microogranisms (U.S. EPA, 1999).

3.2.3 Sanitary Sewer Rehabilitation

The rehabilitation of sanitary sewer trunkline via CIPP lining would correct pipe deficiencies (cracks and breaks) and ensure long-term reliability of this main conduit for wastewater transport. Completing the CIPP of the trunkline would reduce infiltration of groundwater into the sewer system, lessen the subsequent costs of treating those waters mixed with sewage, and extend the operable life of the American Bottoms Regional Wastewater Treatment Plant. These water infrastructure rectifications may improve local water quality and help reduce fecal coliform levels in the Mississippi River.

3.3 WETLANDS AND VEGETATION

3.3.1 Existing Conditions

The project area falls within an area commonly referred to as the American Bottoms, an expansive floodplain of the Mississippi River extending from Alton, Illinois, south to the Kaskaskia River. Historically, this area was primarily used for agriculture due to its rich fertile soils. A variety of aquatic, wetland, and terrestrial natural communities are found in the vicinity of the project area. However, the proposed project area is highly developed, which limits the existing biological resources. A review of the National Wetlands Inventory Database was conducted and no wetlands were identified within the proposed project feature footprint (USFWS 2022).

3.3.2 No Action

Under the No Action Alternative, degraded sanitary sewer trunkline may backup untreated wastewater and overflows into low-lying areas of the Cahokia Heights area. The unknown types and concentrations of contaminants that are exposed to the environment have the potential to negatively impact habitat quality of nearby wetlands.

3.3.3 Sanitary Sewer Rehabilitation

A USACE regulatory review and site visit was completed 10 May 2022. Based on the review of available resources and from information gathered during the field visit, the proposed project within the specified review area would not impact water features, including wetlands. The CIPP lining of the sanitary sewer system would largely be confined to existing roadways, however some minor disturbance to maintained turf grass may occur. These areas would be reseeded with turf grass after construction. Since the sanitary sewer system discharges to the American Bottoms Regional Wastewater Treatment Plant, the rehabilitated system is not expected to alter exiting wetland hydrology.

3.4 FISH AND WILDLIFE

3.4.1 Existing Conditions

A variety of animal species use the urbanized project area. Most wildlife species are adapted to human disturbance or tolerant of fragmented habitats or poor water quality and consist of a variety of amphibians, reptiles, birds, and mammals. For example, fishes observed in open water wetlands are tolerant of high turbidity and include such species as mosquitofish (*Gambusia affinis*) and common carp (*Cyprinus carpio*). Open water and herbaceous wetlands serve as resting and feeding areas for some migratory ducks and geese. Wading birds that typically feed in shallow ponded areas or ditches include the great blue heron (*Ardea herodias*) and great egret (*Ardea alba*). Wild turkey (*Meleagris gallopavo*) may also be seen as well as red-winged blackbirds (*Agelaius phoeniceus*). Larger mammals include raccoon (*Procyon lotor*), common opossum (*Didelphis marsupialis*), and white-tailed deer (*Odocoileus virginianus*).

3.4.2 No Action

Under the No Action Alternative, degraded sanitary sewer trunkline may backup untreated wastewater and overflows into receiving waters such as the Mississippi River or into low-lying areas of the Metro East Sanitary District. The unknown types and concentrations of contaminants that are exposed to the environment have the potential to negatively impact aquatic organisms, especially sensitive species and life stages. By taking no action to address the on-going pollution, sanitary sewer overflow discharges could impact aquatic and terrestrial species.

3.4.3 Sanitary Sewer Rehabilitation

The rehabilitation of sanitary sewer trunkline may improve local water quality, which may benefit aquatic and terrestrial species. Sanitary sewer rehabilitation via CIPP would not require tree removal.

3.5 THREATENED AND ENDANGERED SPECIES

3.5.1 State Listed Species

3.5.1.1 Existing Conditions

The Illinois Department of Natural Resources (IDNR) was contacted via the Ecological Compliance Assessment Tool (EcoCAT) website on 31 May 2022, for a list of Illinois state threatened and endangered (T&E) species that could

potentially be located in the project areas (IDNR project number: 2213761). The EcoCAT report did not identify any Illinois state T&E species in the project area, and therefore terminated further consultation.

3.5.1.2 No Action

Although no Illinois state T&E species were identified for the project area, no action to address degraded sanitary sewer trunkline and the associated pollution may increase vulnerability of unlisted aquatic and terrestrial species.

3.5.1.3 Sanitary Sewer Rehabilitation

Although no Illinois state T&E species were identified for the project area, the rehabilitation of sanitary sewer trunkline may support resiliency of unlisted aquatic and terrestrial species.

3.5.2 Federally Listed Species

In accordance with Section 7(a)(2) of the Endangered Species Act (ESA) of 1973 (as amended), federally funded, constructed, permitted, or licensed projects must take into consideration impacts to federally listed and proposed threatened or endangered species.

3.5.2.1 Existing Conditions

The U.S. Fish and Wildlife Service (USFWS) was contacted via USFWS Information for Planning and Consultation (IPaC) website on 31 May 2022 for a list of Federal threatened, endangered and candidate species that could potentially be located in the project areas (Project Code: 2022-0048704).

Table 1. List of federally listed threatened and endangered species potentially occurring within the proposed project area.

Common Name	Scientific Name	Listing Status	Habitat
Indiana Bat	*Myotis sodalis*	Endangered	Caves and mines (hibernacula); small stream corridors with well-developed riparian woods, upland forests (foraging)
Northern Long-eared Bat	*Myotis septentrionalis*	Threatened	Caves and mines (hibernacula); small stream corridors with well-developed riparian woods, upland forests (foraging)
Monarch Butterfly	*Danaus plexippus*	Candidate	North America
Illinois Cave Amphipod	*Gammarus acherondytes*	Endangered	Cave streams in Illinois sinkhole plain
Decurrent False Aster	*Boltonia decurrens*	Threatened	Disturbed alluvial soils

Indiana Bat. Indiana bats hibernate in caves or mines during the winter months. Hibernation season is from 1 October to 31 March. During the active season (1 April to 30 September), they roost in a wide variety of suitable habitats, such as forested/wooded areas, emergent wetlands, adjacent edges of agricultural fields, old fields, and pastures. Roosting habitats for this species include live trees and/or snags with at least 5 inches diameter at breast height (dbh) that have exfoliating bark, cracks, crevices, and/or hollows. Tree species used as roosts often include, but are not limited to, shagbark hickory, white oak, cottonwood, and maple trees.

Northern Long-eared Bat. Northern long-eared bats hibernate in caves or mines during the winter months. In Illinois, hibernation season is from 1 August to 31 May. During the active season (1 June to 31 July), they roost in a wide variety of suitable habitats, such as forested/wooded areas, emergent wetlands, adjacent edges of

agricultural fields, old fields, and pastures. Roosting habitats for this species include live trees and/or snags at least 3 inches dbh and have exfoliating bark, cracks, crevices, and/or hollows. Tree species used as roosts often include, but are not limited to, shagbark hickory, white oak, cottonwood, and maple trees. Northern long-eared bats have also been observed roosting in human-made structures such as buildings, barns, bridges, and bat houses.

Illinois Cave Amphipod. The Illinois cave amphipod lives in the "dark zone" of cave streams. Like other amphipods, this species needs cold water and does not tolerate a wide range in water temperatures. They are sensitive to touch and avoid light. This species is endemic to the Illinois Sinkhole Plain in Monroe and St. Clair Counties in southwestern Illinois. Currently, the Illinois cave amphipod is found in three of the original six cave systems, all in Monroe County. These caves are fed by separate watersheds with no known connection among them, therefore distribution to other cave systems is unlikely.

Monarch Butterfly. Much of the monarch butterfly's life is spent migrating between Canada, Mexico, and the United States. Grasslands of central North America and areas vegetated by milkweed (*Asclepias syriaca L.*) comprise the majority of summer breeding areas. During the breeding season monarchs require milkweed to rear larvae and provide nectar sources to sustain adults during reproduction. Nectar sources are also required by the butterflies to fuel fall migration and spring flights northward. Monarch populations of eastern North America have declined 90%. Causes of decline include deforestation, illegal logging, increased development, agricultural expansion, livestock raising, forest fires, and other threats to their migratory paths and summer and overwintering habitats. Chemical-intensive agriculture, increasing acreage converted to row crops, and mowing/herbicide treatment of roadsides have contributed to a decline of milkweed, the only plant eaten by monarch caterpillars.

Decurrent False Aster. The decurrent false aster is a perennial floodplain plant of open, wetland habitats, and its distribution includes Madison and St. Clair Counties, Illinois. Historically it occurred in wet prairies, shallow marshes, and shores of rivers, creeks, and lakes on the floodplain of the Illinois and Mississippi Rivers. Currently it is found most often in old agricultural fields and along roadsides and lake shores where alluvial soils have been disturbed. This plant is an early successional species that requires either natural or human disturbance to create and maintain suitable habitat. In the past, the annual flood/drought cycle of the Illinois and Mississippi rivers provided the natural disturbance required by this species. Annual spring flooding created open, high-light habitat and reduced competition by killing other less flood-tolerant, early successional species. Field observations indicate that in "weedy" areas without disturbance, the species is eliminated by competition within 3 to 5 years (USFWS 2001). Decurrent False Aster has high light requirements for growth and seed germination and shading from other vegetation is thought to contribute to its decline in undisturbed areas. Seeds of this plant can be dispersed by flooding or carried by wind and animals. Records indicate this plant occurs in the Metro East area.

3.5.2.2 No Action

Under the No Action Alternative, degraded sanitary sewer trunkline may backup untreated wastewater and overflows into receiving waters such as the Mississippi River or into low-lying areas. The unknown types and concentrations of contaminants that are exposed to the environment have the potential to negatively impact aquatic organisms, especially sensitive species and life stages. By taking no action to address the on-going pollution, sanitary sewer overflow discharges could impact aquatic and plant species. No discernable adverse impacts to butterfly and bat species are anticipated as the result of taking no action to address the degraded sanitary sewer trunkline.

3.5.2.3 Sanitary Sewer Rehabilitation

The rehabilitation of sanitary sewer trunkline may improve local groundwater quality by reducing risk of pipe deficiencies discharging untreated sewage, which may benefit aquatic species. However, there is no suitable habitat for the Illinois cave amphipod within the proposed project area. Therefore, the St. Louis District has determined that taking action to address degraded CSO system would have *"no effect"* on the Illinois Cave Amphipod.

Milkweed (primary butterfly nectar source), Decurrent False Aster, and suitable habitat for bat species could be present in residential sections of the proposed project area. Although CSO rehabilitation via CIPP would not require tree or vegetation removal, temporary construction activities may interfere with any bat foraging activity and minor disturbance to maintained turf grass and weedy areas may occur. Therefore, the St. Louis District has determined that taking action to address degraded CSO system *"may affect, but is not likely to adversely affect"* the Northern Long-eared bat, Indiana bat, Decurrent False Aster, and Monarch Butterfly.

3.6 BALD AND GOLDEN EAGLE

3.6.1 Existing Conditions

Bald Eagles (*Haliaeetus leucocephalus*) winter along the major rivers of Illinois and Missouri and at scattered locations some remain throughout the year to breed. Perching and feeding occurs along the edge of open water, from which eagles obtain fish. The bald eagle was removed from the List of Endangered and Threatened Species in August 2007, but it continues to be protected under the Bald and Golden Eagle Protection Act and by the Migratory Bird Treaty Act. Recommendations to minimize potential project impacts to the bird and nests are provided by the U.S. Fish and Wildlife Service in the agency's National Bald Eagle Management Guidelines publication (USFWS 2010). The guidelines recommend: (1) maintaining a specified distance between the activity and the nest (buffer area); (2) maintaining natural areas (preferably forested) between the activity and nest trees (landscape buffers); and (3) avoiding certain activities during the breeding season. Specifically, construction activity is prohibited within 660 feet of an active nest during the nesting season, which in the Midwest is generally from late January through late July.

3.6.2 No Action

Under the No Action Alternative, no impacts to Bald Eagles are anticipated.

3.6.3 Sanitary Sewer Rehabilitation

There is one known nest in the vicinity of Cahokia Heights, which is approximately 1.3 miles from the proposed project area. It was identified in 2015 and current activity is unknown. No impacts to Bald Eagles are anticipated under the Action Alternative. In the event that a bald eagle nest is observed within 660' of the proposed action areas, the U.S. Fish and Wildlife Service would be contacted immediately.

3.7 RECREATION AND AESTHETICS

3.7.1 Existing Conditions

Primary recreational resources for the City of Cahokia Heights include city and residential parks, a golf course, and the Metro-East Levee Trail. The 7.6 mile gravel trail creates a semicircle around Cahokia Heights, paralleling the canal, providing recreational opportunities to walkers, joggers, hikers, and mountain bikers. City parks offer sport facilities, playgrounds, pavilions, and fishing opportunities.

Aesthetic resources are represented by those aspects of the natural and human environment that are pleasant or pleasing to people. For many people aesthetic resources include the natural channel of the Mississippi River, undeveloped open spaces such as agricultural lands, natural habitats, and some development, such as residential areas. The project area's industrial areas are expected to be aesthetically attractive to relatively few people.

3.7.2 No Action

Under the No Action Alternative, degraded sanitary sewer trunkline may backup untreated wastewater and overflows into receiving waters such as the Mississippi River or into low-lying areas of the Metro East Sanitary District. The unknown types and concentrations of contaminants that are exposed to the environment have the potential to negatively impact the health of outdoor recreationalists and aesthetic factors such as unpleasant odors.

3.7.3 Sanitary Sewer Rehabilitation

Implementing the proposed sanitary sewer rehabilitation project would have a positive impact on the area's aesthetics and recreational resources. Re-lining sanitary sewer trunklines would reduce risk of untreated wastes being discharged into receiving waters, ultimately increasing recreation opportunities. In addition, no additional wastes would be discharged from this system, which would reduce sewer odors in the area. This would improve the aesthetics of the area.

3.8 Air Quality and Noise

The Clean Air Act of 1963 requires the U.S. Environmental Protection Agency (EPA) to designate National Ambient Air Quality Standards (NAAQS). The EPA has identified standards for 6 pollutants: lead, sulfur dioxide, carbon monoxide, nitrogen dioxide, ozone, particulate matter (less than 10 microns and less than 2.5 microns in diameter), along with some heavy metals, nitrates, sulfates, volatile organic and toxic compounds (Table 2).

Table 2. Six pollutants and their standard criteria designated by the U.S. EPA.

Pollutant	Averaging time	Criteria	Form
Carbon monoxide	8 hours	9 ppm	Not to be exceeded more than once per year
	1 hour	35 ppm	
Lead	Rolling 3 month	0.15 µg/m^3	Not to be exceeded
Nitrogen dioxide	1 hour	100 ppb	98th percentile of 1-hour daily maximum concentrations, averaged over 3 years
	1 year	53 ppb	Annual Mean
Ozone	8 hours	0.070 ppm	Annual fourth-highest daily maximum 8-hour concentration, averaged over 3 years
Particle Pollution ($PM_{2.5}$)	1 year	12.0 µg/m^3	Annual mean, averaged over 3 years
	24 hours	35 µg/m^3	98th percentile, averaged over 3 years
Sulfur dioxide	1 hour	75 ppb	99th percentile of 1-hour daily maximum concentrations, averaged over 3 years

3.8.1 Existing Conditions

The project area is located within the Metropolitan St. Louis Interstate Air Quality Control Region (AQCR). This AQCR covers the following counties in Missouri: Franklin, Jefferson, St. Charles, St. Louis, and St. Louis City; and

the following counties in Illinois: Madison, Monroe, and St. Clair. Areas within the AQCR are further defined according to the attainment status of criteria pollutants. The Metropolitan St. Louis AQCR is in attainment for most of the criteria pollutants, including particle pollution ($PM_{2.5}$), sulfur dioxide, carbon monoxide, nitrogen dioxide, and lead (US EPA 2022). The Metro-East area is only in nonattainment area for ozone (8-hr; US EPA 2022). Ozone is not emitted directly into the air by specific sources. Ozone is created by sunlight acting on nitrogen oxides (NOx) and volatile organic compounds (VOC's) in the air. There are many sources of these gases, including gasoline vapors, chemical solvents, fuel combustion products, and some consumer products (USACE 2003).

The Metro-East area includes industrial, transportation, recreational, residential, retail and agricultural zones. These areas are dispersed in pockets of varying sizes and density, and each makes its own contribution to the noise characteristics of the region. Sound is measured in units called decibels (dB). Because people can't hear all frequencies, or pitches of sound, A-weighted decibels (dBA) can be used to describe sound based on what human ears can actually hear. Sounds at or below 70 dBA are usually considered safe, even if they last a long time. Noises are more likely to damage your hearing if they are: 85 dBA and last a few hours; 100 dBA and last at least 14 minutes; or 110 dBA and last at least 2 minutes (U.S. Department of Health and Human Services, 2022). Agricultural and open space areas typically have noise levels in the range of 34-70 decibels (dB) depending on their proximity to transportation arteries. Noise associated with transportation arteries such as highways, railroads, etc., would be greater than those in rural areas. Other sources of noise include operations of commercial and industrial facilities, and operation of construction and landscaping equipment. In general, urban noise emissions do not typically exceed about 60 dB, but may attain 90 dB or greater in busier urban areas or near high volume transportation arteries.

3.8.2 No Action

Because the St. Louis Metropolitan area is a nonattainment area for ozone, control strategies resulting in reduced emissions have been implemented across the region. Control measures targeted at transportation include physical improvements in regional transportations systems and management strategies to reduce hydrocarbons and carbon monoxide emissions from motor vehicles.

Industrial, commercial, and residential development in the floodplain of the Mississippi River is expected to increase within the leveed area. The St. Clair Comprehensive Plan (2011) projects increasing development which is also expected to increase noise levels associated with land use type.

3.8.3 Sanitary Sewer Rehabilitation

During construction, there may be a temporary and localized reduction in air quality due to emissions from heavy machinery operating. However, once the proposed project is complete, no effects to air quality would occur. Diesel emissions from project construction may pose a human health risk for construction workers and exposure to emissions should be minimized. The contractor may consult the *Construction Emission Control Checklist* to reduce expose to diesel exhaust or the *Cleaner Diesels: Low Cost Ways to Reduce Emissions from Construction Equipment* report (US EPA 2007) to reduce the generation of emissions. Special management techniques would be implemented to control air pollution produced by the construction activities. Airborne particulates, including dust particles, from construction activities and processing and preparation of materials would be controlled at all times, including weekend, holidays, and hours when work is not in progress. The contractor would be required to maintain all work areas free from airborne dust. In addition, hydrocarbon and carbon monoxide emissions from equipment would be controlled to Federal and State allowable limits at all times. Therefore, effects of construction on air quality would be insignificant.

Construction of the proposed project may cause a temporary increase in noise in the project vicinity. This effect would only occur during the construction period, and so is anticipated to be temporary and minor. Effects of the increased noise would be comparable to an increase in industrial traffic and therefore is not anticipated to impact the quality of life in the surrounding area. Once the proposed project is complete, no increased effects due to noise would occur.

3.9 SOCIOECONOMICS AND TRANSPORTATION

3.9.1 Existing Conditions

On 6 May 2021 the Village of Cahokia, City of Centreville, and the Village of Alorton merged into the City of Cahokia Heights, with approximately 17,894 residents (US Census, 2020). The median household income in this area is approximately $22,098 (ACS, 2020). The civilian employed population (16 years and over) primarily consists of service, sales, and office occupations (ACS, 2020).

The proposed project area is primarily comprised of residential homes and commercial spaces. The St. Louis Downtown Airport is also near the proposed project area. Traffic in the vicinity of the proposed project consists of highway, local, and river traffic. Traffic on the river varies from barge traffic carrying grain, slag, coiled steel, farming chemicals, and other goods to small recreational pleasure craft. There is substantial traffic along Illinois Highways 3, 157, and 255. Illinois Highway 3 and 157 run directly through the proposed project area and traffic can be impacted by water during flood events. The project area is also traversed by several railroads that service industrial development.

3.9.2 No Action

Under the No Action Alternative, conditions are expected to remain consistent with the existing conditions.

3.9.3 Sanitary Sewer Rehabilitation

Socioeconomics in the proposed project area are not anticipated to be negatively affected as part of this alternative. However, sanitary sewer system construction is largely confined to local roadways. Traffic along Jerome Lane, Range Lane, East 5th Street, Water Street, Levin Drive, and adjacent roads, would be impacted during construction. Temporary road closures or alternate traffic patterns may be needed. This would impact residents of this area as well commercial enterprises. However, these impacts would be temporary.

3.10 HAZARDOUS, TOXIC, AND RADIOACTIVE MATERIALS

3.10.1 Existing Conditions

The U.S. Army Corps of Engineers Regulations (ER 1165-2-132 and ER 200-2-3), and District policy requires procedures be established to facilitate early identification and appropriate consideration of potential hazardous, toxic, or radioactive waste (HTRW) in reconnaissance, feasibility, preconstruction engineering and design, land acquisition, construction, operations and maintenance, repairs, replacement, and rehabilitation phases of water resources studies or projects by conducting HTRW Initial Hazard Assessments (IHA). USACE specifies that these assessments follow the process/standard practices for conducting Phase I Environmental Site Assessments (ESA) published by the American Society for Testing and Materials (ASTM). This assessment was prepared using the following ASTM Standards:

- E1527-21: Standard Practice for Environmental Site Assessments – Phase I Environmental Site Assessment process

- E1528-06: Standard Practice for Limited Environmental Due Diligence: Transaction Screen Process (interview questionnaires)

The purpose of a Phase I Environmental Site Assessment is to identify, to the extent feasible in the absence of sampling and analysis, the recognized environmental conditions (RECs) in connection with a given property(s), within the scope of EPA Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and petroleum products. A Phase I Environmental Site Assessment was completed on 17 June 2022. The ESA revealed potential RECs in the construction area and are further documented in the Appendix.

3.10.2 No Action

The lower 3.5 miles of the Cahokia Heights sanitary sewer system would continue to degrade, causing sanitary sewer overflow (a hazardous waste) into occupied and vacant areas. Therefore, this alternative would continue having a negative effect on human and environmental health.

3.10.3 Action Alternative

The proposed restoration would reduce the frequency of sanitary sewer overflow (a hazardous waste) into occupied and vacant areas. Therefore, this alternative would have a positive long-term effect on human and environmental health.

Release of volatile organic and semivolatile organic compounds during the curing process of the CIPP would be a short-term risk. Impacts to the environment can be minimized when proper installation methods are used. Therefore, it is recommended that the awarded contractor follow manufacturers installation guidelines. It is also recommended that the awarded contractor consult with the CIPP manufacturer to identify appropriate personal protective equipment to be warn during installation.

Plans and Specifications have not been drafted, however it is anticipated that excavation and groundwater dewatering would be required at the trunkline's western terminus. This area falls within 100 yards of the Sauget Area 1: Dead Creek Superfund site (Proposed for National Priorities List). Contaminants that would likely be encountered during construction include elevated concentrations for Iron, Manganese, and Lead. Consultation with the Illinois Environmental Protection Agency would be required to determine appropriate management and disposal of contaminated material.

The Phase I Environmental Site Assessment identified several Recognized Environmental Conditions (RECs) along the trunkline's corridor. Given the general procedures for CIPP installation, the likelihood of the pre-existing RECs having an impact on project success should be considered a low risk. CEMVS Environmental Quality Section should be notified if severely degraded pipe cannot be lined with CIPP, and alternative restoration methods are required. The Environmental Quality Section should be contacted immediately if HTRW material is encountered at any point during construction activities.

3.11 CULTURAL RESOURCES

3.11.1 Existing Conditions

Cultural resources are locations of past human activity, occupation or use and typically include archaeological sites such as prehistoric lithic scatters, villages, procurement area, rock art, shell middens, and historic era sites such as refuse scatters, homesteads, railroads, ranches, logging camps, and any structures or buildings that are over 50 years old.

The study area is located within the American Bottoms, an area of Mississippi River floodplain extending from Alton on the north, south to the mouth of the Kaskaskia River, near the city of Chester. This area is known for its abundant and significant prehistoric, colonial, and historic cultural resources. Cahokia Mounds, a World Heritage site, lies eight miles northeast of the project area.

3.11.2 No Action

As development continues to expand within the project area, including the floodplain of the Mississippi River, archaeological resources not in public ownership or protection are increasingly vulnerable to commercial and residential development.

3.11.3 Sanitary Sewer Rehabilitation

All actions taken would be in accordance with the National Historic Preservation Act of 1966, as amended (NHPA). The NHPA requires that any Federal undertaking consider the effects to historic properties and consultation with State Historic Preservation Officers and the Advisory Council on Historic Preservation. This act is further codified in 36 CFR Part 800, Protection of Historic Properties.

The project would primarily involve line rehabilitation of approximately 3.5 miles of sanitary sewer trunkline within the city. This project would utilize the technique of CIPP lining. This is a method of trenchless rehabilitation and restoration used to repair existing pipes. As such there will be little or no earthmoving evolved. Given this methodology it's USACE option that the proposed undertaking will have no significant effects on historic properties.

In a letter dated May 11, 2022, the IL SHPO was consulted regarding the proposed project. In response to the initial consultation letter, the IL SHPO replied in a letter dated June 1, 2022, that they had no objections to the proposed undertaking (LOG #002051822).

In the unlikely event that more extensive excavation becomes necessary, USACE would perform historic properties investigations (archival records searches and on-site investigations) within areas of potential ground surface disturbances associated with this study. Such areas would include any potential construction sites/equipment staging areas. Should these investigations identify any archeological remains, USACE will immediately notify the IL SHPO and apprise them of the discovery. After consultation with the IL SHPO, should avoidance of the remains not be feasible, additional archaeological fieldwork will be required to determine the significance of the archaeological remains. The conduct and extent of such investigations would also be formally coordinated, in advance, with the IL SHPO and other interested parties, including potentially affiliated Indian tribes.

Should any archaeological remains be uncovered incidentally during construction all construction-related excavations within the immediate vicinity of the find would cease pending a professional archaeological determination of the significance of such remains. Fieldwork procedures related to this activity would be identical to those described in the preceding paragraph.

3.12 TRIBAL RESOURCES

3.12.1 Existing Conditions

In addition to the consultation with IL State Historic Preservation Office (SHPO), consultation with Native American Tribal organizations would also be required to ensure compliance with Section 106 of the National Historic Preservation Act of 1966, as amended. The USACE St. Louis District has previously established consultation agreements with 25 tribal nations that have ties to, or an interest in, this portion of the District's area of responsibility.

3.12.1 No Action

As development continues to expand within the project area, including the floodplain of the Mississippi River, archaeological resources not in tribal or public ownership or protection are increasingly vulnerable to commercial and residential development.

3.12.2 Sanitary Sewer Rehabilitation

The project would primarily involve line rehabilitation of approximately 3.5 miles of sanitary sewer trunkline within the city. This project would utilize the technique of CIPP lining. This is a method of trenchless rehabilitation and restoration used to repair existing pipes. As such there would be little or no earthmoving evolved. The proposed rehabilitation of sanitary sewers utilizing CIPP methods is anticipated to have no adverse impacts on archaeological resources.

In the unlikely event that more extensive excavation becomes necessary, USACE would perform historic properties investigations (archival records searches and on-site investigations) within areas of potential ground surface disturbances associated with this study. Such areas would include any potential construction sites/equipment staging areas. Should these investigations identify any archeological remains, USACE will immediately notify the IL SHPO and apprise them of the discovery. After consultation with the IL SHPO, should avoidance of the remains not be feasible, additional archaeological fieldwork will be required to determine the significance of the archaeological remains. The conduct and extent of such investigations would also be formally coordinated, in advance, with the IL SHPO and other interested parties, including potentially affiliated Indian tribes.

Should any archaeological remains be uncovered incidentally during construction all construction-related excavations within the immediate vicinity of the find would cease pending notification of the consulting tribal nations.

4 ENVIRONMENTAL JUSTICE

Executive Order 12898 directs federal agencies to take the appropriate steps to identify and address any disproportionately high and adverse human health or environmental effects of federal programs, policies, and activities on minority and low-income populations. Minority populations are those persons who identify themselves as Black, Hispanic, Asian American, American Indian/Alaskan Native, and Pacific Islander. A minority population exists where the percentage of minorities in an affected area either exceeds 50 percent or is meaningfully greater than in the general population.

The population of Cahokia Heights is approximately 78.3% African-American, 0.3% American Indian or Alaskan Native, 0.1% Asian, 0.1% Native Hawaiian or Pacific Islander, and 4.2% more than one race (US Census 2020; Table 3). The population is 1.2% Hispanic or Latino (ACS 2020). There are approximately 53.7% of households in the Cahokia Heights area whose income in the past 12 months falls below the national poverty level (ACS 2020). No disproportionate adverse impacts to low-income or minority populations are anticipated, conversely, the rehabilitation of sanitary sewer trunkline would reduce the potential exposure of pathogens and contaminants to the residents of the area, providing a considerable benefit.

Table 3. Cahokia Heights and Illinois population demographics. (US Census, 2020).

	Cahokia Heights		Illinois	
	Population	**%**	**Population**	**%**
White	2,852	15.9	7,868,227	61.4
Black or African American	14,016	78.3	1,808,271	14.1
American Indian and Alaska Native	63	0.3	96,496	0.8
Asian	23	0.1	754,878	5.8
Native Hawaiian and Other Pacific Islander	9	0.1	4,501	0.1
Other	169	0.9	1,135,149	8.9
Two or more races	762	4.2	1,144,984	8.9
Total	17,894	100.0	12,812,508	100.0

5 CLIMATE CHANGE

The USACE, Institute of Water Resources (IWR) published a document titled "Recent US Climate Change and Hydrology Literature Applicable to the U.S. Army Corps of Engineers Missions of the Upper Mississippi Region 07 in 2015". The synopsis included in that document generally describes territory within the St. Paul, Chicago, Rock Island, and St. Louis USACE districts. The synopsis evaluated, observed, and projected trends in temperature, precipitation, and stream flow as well as the general consensus in the literature reviewed of the trending parameters.

The USACE IWR (2015) found a general consensus for a moderate to large upward trend in observed average temperature, minimum temperatures, average precipitation, extreme precipitation, and streamflow in the Upper Mississippi Region. There is a reasonable consensus that maximum air temperatures have decreased slightly in the recent past in the region. However, projected extreme precipitation is expected to have only a small increase with moderate consensus in the literature reviewed and forecasts of future hydrology and stream-flow are anticipated to be variable, with low overall consensus in the literature reviewed. Therefore, it was presumed that these watersheds are not anticipated to incur significant precipitation changes due to climate change within the anticipated 50 year period of analysis. Furthermore, the proposed project is not anticipated to influence global climate change.

6 CUMULATIVE AND ADVERSE IMPACTS

The discussion of cumulative impacts considers the effects on the resource that result from the incremental impact of the action being considered when added to other past, present, and reasonably foreseeable future actions regardless of what agency, Federal or non-Federal, or person undertakes such other actions. This section identifies possible cumulative effects of the considered alternatives when combined with past trends and other ongoing or expected future plans and projects.

The City of Cahokia Heights has previously rehabilitated sections of sanitary sewer trunkline in other areas of Cahokia Heights (Figure 2, red line). This proposed project would complete the sanitary sewer rehabilitation efforts in Cahokia Heights.

Based on this review, no cumulative adverse impacts are anticipated. Conversely, cumulative beneficial impacts are anticipated as a result of the proposed action.

7 COORDINATION

Notification of the Draft Environmental Assessment and unsigned Finding of No Significant Impact will be sent to officials, agencies, organizations, and individuals for public review and comment. Additionally, an electronic copy will be available during the public review period (1-30 July 2022) on the USACE St. Louis District's website at:

http://www.mvs.usace.army.mil/Portals/54/docs/pm/Reports/EA/CahokiaHeightsSewerRehabilitationEA.pdf

Please note that the Finding of No Significant Impact is unsigned in the draft version of the EA and may only be signed into effect after careful consideration of the comments received as a result of the public review. In addition, to ensure compliance with the National Environmental Policy Act, Endangered Species Act, and other applicable environmental laws and regulations, coordination with these entities and individuals will continue, as required, throughout the execution of the proposed project.

8 ENVIRONMENTAL COMPLIANCE

Guidance	Compliance
Federal Statutes	
Archaeological and Historic Preservation Act, as Amended, 16 U.S.C. 469, et seq.	PC[1]
Bald and Golden Eagle Protection Act, 42 USC 4151-4157	FC
Clean Air Act, as Amended, 42 U.S.C. 7401-7542	FC
Clean Water Act, as Amended 33 U.S.C. 1251-1375	PC[2]
Comprehensive Environmental Response, Compensation, and Liability Act, 42 USC 9601-9675	FC
Endangered Species Act, as Amended, 16 U.S.C. 1531-1543	PC[2]
Federal Water Project Recreation Act, as Amended. 16 U.S.C. 4601, et seq.	FC
Fish and Wildlife Coordination Act, as Amended, 16 U.S.C. 661-666c	PC[2]
Land and Water Conservation Fund Act, as Amended, 16 U.S.C. 4601, et seq.	FC
National Environmental Policy Act, as Amended, 42 U.S.C. 4321- 4347	PC[3]
National Historic Preservation Act, as Amended, 54 U.S.C 300101, et seq.	PC[1]
Noise Control Act, 42 USC 4901, et seq.	FC
Migratory Bird Treaty Act of 1918, 16 USC 703, et seq.	FC
Resource Conservation and Recovery Act, 42 USC 6901-6987	FC
Executive Orders	
Federal Actions to Address Environmental Justice in Minority Populations and Low-Income Populations (EO 12898)	FC
Floodplain Management, E.O. 11988 as amended by E.O. 12148	FC
Protection of Wetlands, E.O 11990 as amended by E.O. 12608	FC
Protection and Enhancement of the Cultural Environment, E.O. 11593	PC[1]
Consultation and Coordination with Indian Tribal Governments, 06 Nov 2000, E.O. 13175	PC[1]
Protection of Migratory Birds (EO 13186)	FC

FC = Full Compliance, PC = Partial Compliance.

1. FC attained after completion of all required archaeological investigations, reports, and coordination.
2. FC attained upon completion of any permitting requirements or coordination with other agencies.
3. FC attained upon signing of the NEPA decision document.

9 LIST OF PREPARERS

- Rachel Steiger, Environmental Coordinator
- Travis Schepker, HTRW Specialist
- Mark Smith, Ph.D., Cultural and Tribal Coordinator

10 REFERENCES

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Sanitary Sewer Trunkline Project

Cahokia Heights, St. Clair County, Illinois

FINDING OF NO SIGNIFICANT IMPACT

1. In accordance with the National Environmental Policy Act, I have reviewed and evaluated the documents relevant to the rehabilitation of sanitary sewer trunkline in Cahokia Heights, IL. The work involves rehabilitating 3.5 miles of sanitary sewer trunkline by cleaning, televising, and installing cast-in-place pipe (CIPP) in the main sanitary sewer trunkline.

2. As part of this evaluation, I have considered the following project alternatives:

    a. No Action Alternative - Under this alternative, no federal action would take place and the sanitary sewer trunkline would continue to deteriorate.

    b. Sanitary Sewer Rehabilitation Alternative - The St. Louis District, U.S. Army Corps of Engineers (USACE) would provide Federal construction assistance to the City of Cahokia Heights, Illinois, to rehabilitate 3.5 miles of the main sanitary sewer trunkline.

3. The possible consequences of the two alternatives have been studied for physical, environmental, and social effects. Relevant factors evaluated as part of this review include:

    a. Water quality, fish and wildlife, and recreation and aesthetic resources would accrue some benefits as a result of the project.

    b. No adverse impacts to federally threatened or endangered species are anticipated.

    c. The proposed rehabilitation of sanitary sewer trunkline is not anticipated to have an adverse impact upon archaeological remain, historic properties, or tribal resources.

    d. No significant impacts to natural resources are anticipated, including fish and wildlife resources and wetlands. The proposed repairs would have no adverse impacts to the physical environment (e.g., noise, air and water quality).

    e. The project would benefit primarily low-income and/or minority populations.

    f. The “No Action” alternative was evaluated and would be unacceptable to recommend as this system would continue to discharge untreated sewage water, which poses a human health risk.

4. Compliance with Clean Water Act Section 404, and Rivers and Harbors Act Section 10 is achieved under Nationwide Permit 3 for Maintenance Activities. Compliance with Section 106 of the National Historic Preservation Act (NHPA) was achieved through coordination with the Illinois State Historic Preservation Office. The Fish and Wildlife Service reviewed the document during public review to ensure compliance with the Endangered Species Act and Fish and Wildlife Coordination Act. Compliance with the National Environmental Policy Act will be achieved with the signing of this document. The project is in compliance with all other applicable laws and regulations as documented in the Environmental Assessment.

5. Based on my analysis and evaluation of the alternative courses of action presented in the Environmental Assessment, I have determined that the implementation of the Sanitary Sewer Rehabilitation Alternative

would not have significant effects on the quality of the environment. Therefore, an Environmental Impact Statement will not be prepared prior to proceeding with this action.

_____ _____

(Date)

Kevin Golinghorst
Colonel, U.S. Army
District Commander

DEPARTMENT OF THE ARMY
U.S. ARMY CORPS OF ENGINEERS, ST. LOUIS DISTRICT
1222 SPRUCE STREET
ST. LOUIS, MISSOURI 63103-2833

8 July 2022

REPLY TO ATTENTION OF:
Regional Planning and Environmental Division North
Environmental Compliance Section (CEMVP-PD-C)

RE: Environmental Infrastructure Assistance: Sanitary Sewer Trunkline Project

Dear Sir or Madam:

The St. Louis District, U.S. Army Corps of Engineers has prepared a Draft Environmental Assessment (EA) and unsigned Finding of No Significant Impact (FONSI) for the Environmental Infrastructure Assistance Sanitary Sewer Trunkline Project, Cahokia Heights, St. Clair County, Illinois. Please note that the Finding of No Significant Impact is unsigned.

Under the National Environmental Policy Act of 2020, the St. Louis District is distributing this letter to notify concerned agencies, interest groups, and individuals of the proposed project and to solicit comments from those persons or organizations who may be interested in or affected by the project. The FONSI is unsigned and would only be signed after comments received as a result of this public review have been given full consideration.

An electronic copy of the EA and unsigned FONSI can be obtained from the St. Louis District's website at

http://www.mvs.usace.army.mil/Portals/54/docs/pm/Reports/EA/CahokiaHeightsSewerRehabilitationEA.pdf

The City of Cahokia Heights and the St. Louis District of the U.S. Army Corps of Engineers propose rehabilitating approximately 3.5 miles of sanitary trunk sewer pipe to correct pipe deficiencies and ensure long-term reliability of this main conduit for wastewater transport. Environmental impacts associated with the proposed project are outlined in the draft EA.

Please provide any comments you may have regarding this project to Rachel Steiger of the Environmental Compliance Section, at the address listed above, Suite 3.302, or **e-mail** Rachel.L.Steiger@usace.army.mil. In order for comments to be considered prior to a final decision being made, they must be received by this office by close of business on **8 August 2022**.

Thank you,

ALLEN.TERESA.C.1249713011 Digitally signed by ALLEN.TERESA.C.1249713011 Date: 2022.07.06 16:16:53 -05'00'

Teri C. Allen, Ph.D.
Chief, Environmental Compliance Section