DEPARTMENT OF THE ARMY
ST. LOUIS DISTRICT, CORPS OF ENGINEERS
ROBERT A. YOUNG BUILDING - 1222 SPRUCE ST.
ST. LOUIS, MISSOURI 63103-2833

24 August 2018

Reply to:
U.S. Army Corps of Engineers
St. Louis District
Environmental Compliance Section (PD-C)
1222 Spruce Street
St. Louis, MO 63103-2833

RE: Sewer Separation and Stormwater Detention City of Belleville, St. Clair County Illinois

Dear Sir or Madam:

We are providing for your review a Draft Environmental Assessment (EA) and unsigned Finding of No Significant Impact for the U.S. Army Corps of Engineers Rivers Water and Resources Development Act (WRDA), Section 219(f)(55), Environmental Infrastructure Assistance Project to serve the City of Belleville, Illinois. The project is located within the East Creek Watershed, generally bounded by Richland Creek, Highway 161 and the Metrolink train tracks.

An electronic copy can be obtained from the St. Louis District's website at:

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

A proposed separate storm sewer would be constructed to remove the stormwater runoff flows. The newly constructed storm sewer pipelines would flow into proposed detention ponds. The two detention ponds would accommodate the newly separated stormwater flows to meet current standards for storm water best management practices, reducing the need for wastewater treatment of combined flows. Please note that the Finding of No Significant Impact is unsigned. This document will be signed into effect only after having carefully considered comments received as a result of this public review.

We invite your comments related to the content of the environmental assessment. Please address your comments or questions to Christopher Hopfinger of the Environmental Compliance Section (CEMVP-PD-C), at telephone number (314) 331-8171, or e-mail at Christopher.Hopfinger@usace.army.mil, by close of business on 24 September 2018.

Thank you,
TC Allen
Teri C. Allen, Ph.D.
Chief, Environmental Compliance Section

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

Environmental Assessment
East Creek
Sewer Separation Project
City of Belleville, St. Clair County, Illinois

August 2018

U.S. Army Corps of Engineers
St. Louis District
Regional Planning & Environmental Division North
1222 Spruce Street
St. Louis, Missouri 63103-2833
Telephone Number: (314) 331-8171

Table of Contents

Environmental Assessment
East Creek
Sewer Separation Project
City of Belleville, St. Clair County, Illinois
August 2018

1 INTRODUCTION

This Environmental Assessment (EA) has been prepared in accordance with the National Environmental Policy Act (NEPA) of 1969 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). This EA evaluates the direct, indirect, and cumulative environmental, cultural, and social effects of the proposed East Creek Sewer Separation Project. The St. Louis District, U.S. Army Corps of Engineers (USACE) has proposed to enter into a Project Partnership Agreement (PPA) with the City of Belleville, Illinois. In this agreement, USACE, proposes to provide Federal construction assistance to the City of Belleville in order to separate sanitary and storm water flows from an existing combined sewer system.

1.1 AUTHORITY

Section 219 of the Water Resource Development Act of 1992, Environmental Infrastructure, as amended by Section 504 of the Water Resources Development Act of 1996, Section 502 of the Water Resources Development Act of 1999, and Section 108 of the Departments of Labor, Health, and Human Services, and Education, and Related Agencies Appropriations Act of 2001 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 waste water treatment and related facilities and water supply, storage, treatment, and distribution facilities.

Section 1157(a) of WRDA 2016 authorizes the Secretary to carry out to completion any project authorized under Section 219 of WRDA 1992. This section applies to the completion of all components of the assistance included under the following Section 219 project authorizations, as amended and supplemented: (i) Section 219(f)(25) "Lake Marion and Moultrie, South Carolina;" (ii) Section 219(f)(30) "DeSoto County, Mississippi;" (iii) Section 219(f)(42) "San Ramon Valley, California;" and (iv) Section 219 (55) "Madison and St. Clair Counties, Illinois". These projects are the only projects to which Section 1157 applies.

1.2 PROJECT LOCATION

The proposed East Creek Sewer Separation Project is located within the city limits of Belleville, St. Clair County, Illinois. The project is generally bounded by Richland Creek on the northwest and Belleville Metrolink tracks on the southern perimeter. Lebanon Avenue and Highway 161 are the main transportation routes within the project vicinity (Figure 1).

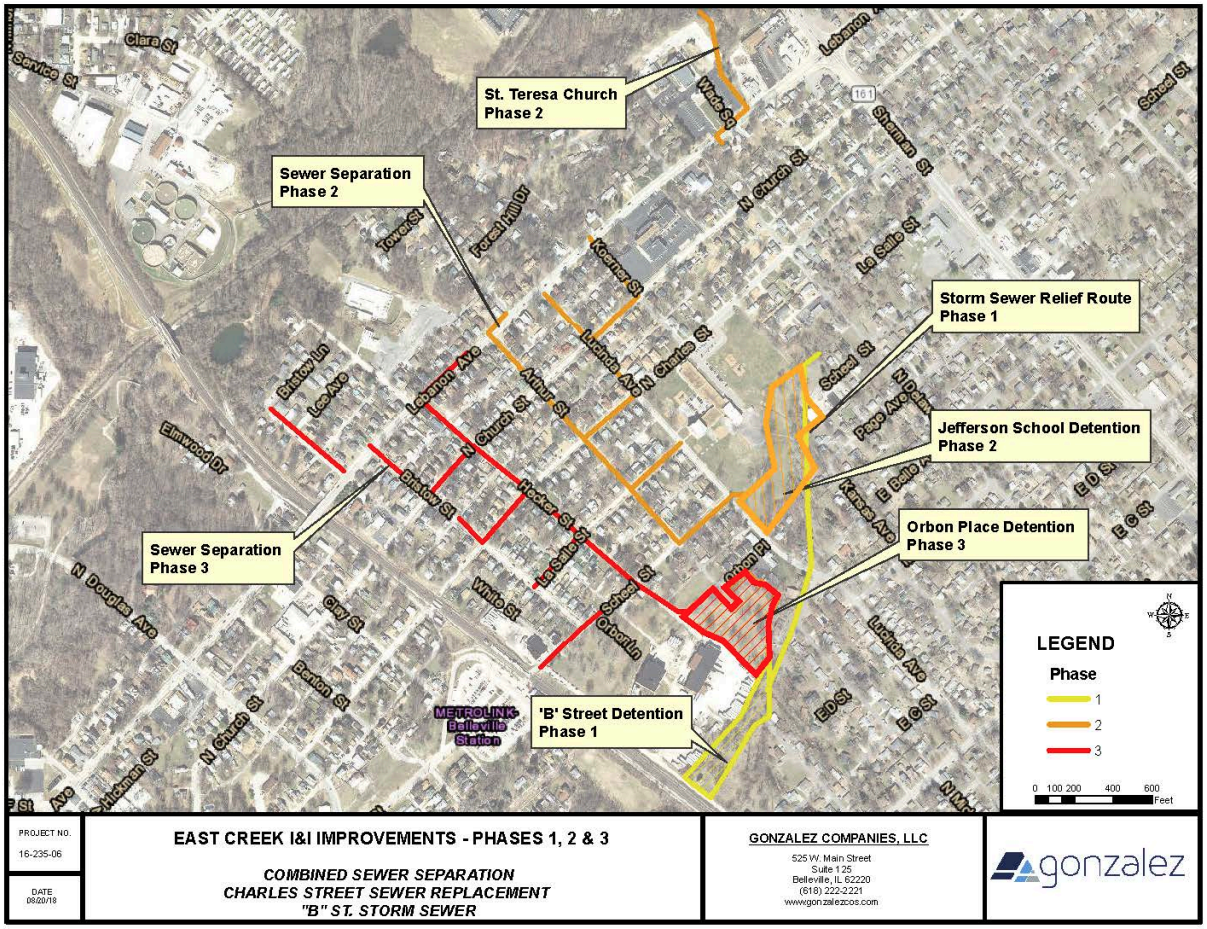

Figure 1. *Proposed East Creek Sewer Separation Project Location Map, Belleville, Illinois (Gonzalez 2018).*

1.3 PURPOSE AND NEED

The current sewer and sanitation system within the proposed project area allows for storm water flows to combine with existing sewer lines when moderate to heavy rainfall events occur. The majority of combined sewer system within the proposed project area drains through undersized piping. A 2.0 million gallon relief tank at the end of Hecker Street receives storm sewer overflow from two relief sewer pump stations. The existing water capacity of the combined sewer is undersized and cannot meet the needs of the watershed during moderate to heavy rainfall events. Residential and industrial sewers experience frequent surcharging and pose a serious health threat to the surrounding community. Currently, surcharges require emergency bypass pumping to prevent sewer back-ups and over street flows within the primarily residential area. Separating the sanitary and storm water flows would alleviate the human health threats and improve overall water quality within the East Creek Watershed. The proposed improvements would be consistent with goals set forth within the City of Belleville Combined Sewer Overflow Long Term Control Plan.

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 Separation Alternative) was developed by the City of Belleville and Gonzalez Companies (LLC) to address the deficient sewer system. A No Action Alternative is also considered for all areas under consideration.

2.1 NO ACTION ALTERNATIVE (FUTURE WITHOUT PROJECT)

Under the No Action Alternative, the existing combined sewer infrastructure would remain intact. 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 combined sewer surcharging and back-ups experienced during moderate to high rainfall events. Associated risk of human exposure to harmful viruses, bacteria and parasites would exist under this alternative.

2.2 SEWER SEPARATION ALTERNATIVE (TENTATIVELY SELECTED PLAN)

Under the Sewer Separation Alternative, a separate storm sewer would be constructed to remove the stormwater runoff flows. The newly constructed storm sewer pipelines would flow into proposed detention ponds. The three detention ponds would accommodate the separated stormwater flows to meet current standards for storm water best management practices, reducing the need for wastewater treatment of combined flows. A proposed detailed construction design follows:

The proposed collection facilities have been separated into three areas, represented by Phase 1, 2 and 3 (Figure 1). Phase 1 proposes construction of a new storm sewer relief route along Belle Avenue, and a new detention pond by 'B' Street, adjacent to the Metrolink train tracks. The relief route would provide additional capacity to convey stormwater runoff to the existing 'B' Street pump station. The pump station is supplied from the east by a 48-inch storm sewer that frequently is surcharged during heavy rain events. The additional capacity would be provided by replacing 1,120 linear feet (LF) of the existing 48-inch pipe with 72-inch pipe, and further upstream (where greater corridor width is available), by placing 1,080 LF of new 48-inch pipe parallel to the existing 48-inch pipe. A total of approximately 2,200 linear feet of new storm sewer (48-inch and 72-inch diameter) is proposed. The upstream end of the relief line would be near the Jefferson Elementary School. The line would discharge into the proposed 'B' Street detention pond. The proposed 'B' Street detention pond would receive flow from the proposed storm sewer relief line along Belle Avenue and from the proposed Orbon Place detention pond as described in Phase 2 of this project. The proposed 'B' Street detention pond would be built immediately upstream of the existing 'B' Street Pump Station. The 'B' Street detention pond, approximately 1.8 acres, would provide 134,400 cubic feet of storage with two feet of freeboard at a maximum depth of 10 feet. A six foot high chain-link fence would be installed around the proposed detention pond perimeter. Approximately 1,130 linear feet of sanitary sewer (12-inch) must be installed to construct the proposed 'B' Street detention pond. Approximately 1.8 acres of existing scattered trees would be converted to wetland habitat for the establishment of the detention pond.

Phase 2 would separate combined sewers by proposed construction of approximately 5,700 linear feet of new storm sewer (15-inch to 42-inch diameter) along St. Teresa Church, Koerner St, Lucinda Ave, Lebanon Ave, Arthur St, North Charles St, LaSalle St, and Scheel St, and a proposed detention pond

behind Jefferson Elementary School. The existing combined sewer is proposed to be converted to sanitary sewer. The proposed Jefferson Elementary detention pond would receive flow from the proposed storm sewers built for the East Creek Sewer Separation Project. The proposed Jefferson Elementary detention pond would discharge via a control structure and proposed 72-inch storm sewer (Phase 1). The proposed detention pond would be constructed to an average depth of 6 to 10 feet. The property is currently owned by the school district. The existing school access path would be removed and relocated around the proposed detention pond as part of Phase 2. Proposed tree removal would be minimal to facilitate construction of the proposed detention pond. A six foot high chain-link fence would be installed around the proposed detention pond perimeter.

Phase 3 proposes construction of new storm sewers along Lebanon Ave, Hecker St, North Church St, North Charles St, Bristow St, LaSalle St, and Scheel St. The proposed sewers would discharge to the proposed Orbon Place detention pond. Approximately 5,000 linear feet of new storm sewer (15-inch to 48-inch diameter) is proposed. Approximately 840 linear feet of sanitary sewer (18- inch) would be installed. The proposed Orbon Place detention pond would discharge via a control structure and 465-ft long 36-inch diameter pipe to the proposed 'B' Street detention pond. The pond would be built on City-owned property south of Orbon Place and just north of the East Creek Watershed storm water retention tank that was built in 2015. The Orbon Place detention pond would provide 388,700 cubic feet of storage with two feet of freeboard at a maximum depth of 11 feet. Approximately 15 mature trees would be removed to facilitate the proposed Orbon Place detention pond construction. A six foot high chain-link fence would be installed around the proposed detention pond perimeter.

Earthen excavation of approximately 56,000 cubic yards of material would be required for construction of the all proposed detention ponds. Excavated material would be moved to a lot adjacent to the detention ponds or stockpiled for future use. The total area drained by the proposed storm water collection system for all phases is approximately 54 acres.

Table 1. *Sewer Separation Alternative features and quantities shown by phase and project totals.*

	Phase 1	**Phase 2**	**Phase 3**	**Project Totals**
Detention Ponds	B Street, 1.8 acres	Jefferson School, 2.9 acres	Orbon Place, 2.7 acres	7.4 acres
Storage Volume Detention Ponds *	134,400	200,000	388,700	723,100
Storm Sewer Pipeline**	2,200	5,700	5,840	13,740

*Shown as cubic feet; **shown as linear feet.

3 AFFECTED ENVIRONMENT AND ENVIRONMENTAL IMPACTS

This section describes existing conditions in the proposed project area, which are referred to under the NEPA process as the Affected Environment. 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.

The discussion of impacts within this section (environmental consequences) detail those resources that could be impacted, directly or indirectly, by the no action alternative and the proposed action. Direct impacts are those that would take place at the same time and place (40 CFR§1508.8(a)) as the action under consideration. Indirect impacts are those that are caused by the action and are later in time or farther removed in distance, but are still reasonably foreseeable (40 CFR §1508.8(b)).

3.1 TOPOGRAPHY, GEOLOGY AND LAND USE

3.1.1 Existing Conditions

The proposed project area is located within an urban setting consisting of residential homes, schools, and industrial businesses. The upland landscape within this area is characterized by moderate elevation changes with inclusions of low lying areas, i.e. ditches and swales. The soils are considered to be moderate- to well-drained within the proposed Orbon Place detention pond area and adjacent lands to the west. The proposed 'B' Street detention pond area contains soils that are somewhat poorly drained. Hydric soils are not present within the proposed project area. Soil types within the proposed Jefferson Elementary detention pond area are similar to the Orbon Place area.

3.1.2 No Action Alternative

The no action alternative would have no direct or indirect impact on the current topography, geology or soil types within the project area since no soil or land disturbance would take place.

3.1.3 Sewer Separation Alternative

Alterations to the topography and soils would occur under the Sewer Separation Alternative. The proposed detention ponds would be excavated to an approximate maximum depth of eleven feet to accommodate storm water flows within the 54 acre watershed. Soil removed from the proposed Orbon Place detention pond during construction would be used to create a low perimeter berm on site and stockpiled for future use by the City of Belleville. The soil removed from proposed 'B' Street detention pond would be moved to an adjacent land lot, directly east and north of the Metrolink train tracks. Earthen excavation material removed from the proposed Jefferson Elementary detention pond would be utilized on site to build a retention berm. Any excess soil would be stockpiled or moved to the other proposed detention pond sites for future use. Approximately 56,000 cubic yards of soil would be required to excavate the proposed detention ponds.

Installation of the proposed storm sewer lines would involve localized impacts to soils within the immediate footprint. Soils would be excavated to allow for installation and or removal of sewer lines. Upon completion of construction, excavated soil would utilized to backfill and then leveled to match the existing topography.

3.2 WATER QUALITY

3.2.1 Existing Conditions

The proposed project area is bounded by Richland Creek which flows from the northeast to southwest along the outside north perimeter. The Illinois EPA Section 303(d) list includes portions of Richland Creek-South (Segment ID OC-95) (HUC 0714020406) as impaired for aquatic life due to phosphorus

(Total) as well as sedimentation/siltation and low dissolved oxygen (IEPA 2018). The average monthly naturally occurring flows in Richland Creek is 93 cubic feet per second.

The City of Belleville has a permitted facility (IL0021873, Belleville STP #1) that is allowed to discharge 8.0 million gallons per day (MGD) into Richland Creek. Potential pollutant sources for Richland Creek-South (OC-95) were identified within the 2012 IEPA Lower Kaskaskia River Watershed TMDL Report. Potential pollutant sources included; municipal point source discharges, crop production and urban runoff/storm sewers (IEPA 2012).

3.2.2 No Action Alternative

The potential for storm related residential and industrial sewer back-ups and street overflows would remain and pose a greater potential for increased risk to water quality under this alternative.

3.2.3 Sewer Separation Alternative

The increased capacities and ability to separate storm water flows from existing and proposed storm sewer lines would decrease the average annual waste water treatment quantities for the East Creek Sewer System. A decrease in waste water would result lower pumping volumes discharged into the watershed, thus having a positive benefit to the ecosystem by reducing sanitary discharges. Decreased contact risk with pathogens and bacteria would result from the proposed Sewer Separation Alternative (EPA 2012).

The detention ponds would have increased environmental benefits by providing temporary storage of storm water and allowing a more natural water filtering process for groundwater recharge.

3.3 RECREATION AND AESTHETICS

3.3.1 Existing Conditions

Public recreational opportunities adjacent to the proposed project area consist of running, walking, and biking trails. The Metro Bikelink Trail is directly adjacent to the proposed ‘B’ street detention pond and connects the local communities of Swansea, Fairview Heights and Belleville. The Richland Creek Greenway Trail intersects with the Metro Bikelink Trail near the Richland Creek bridge crossing. The Richland Creek Greenway Trail traverses the Richland Creek corridor providing the same public recreational opportunities as the Metro Bikelink Trail (Figure 2).

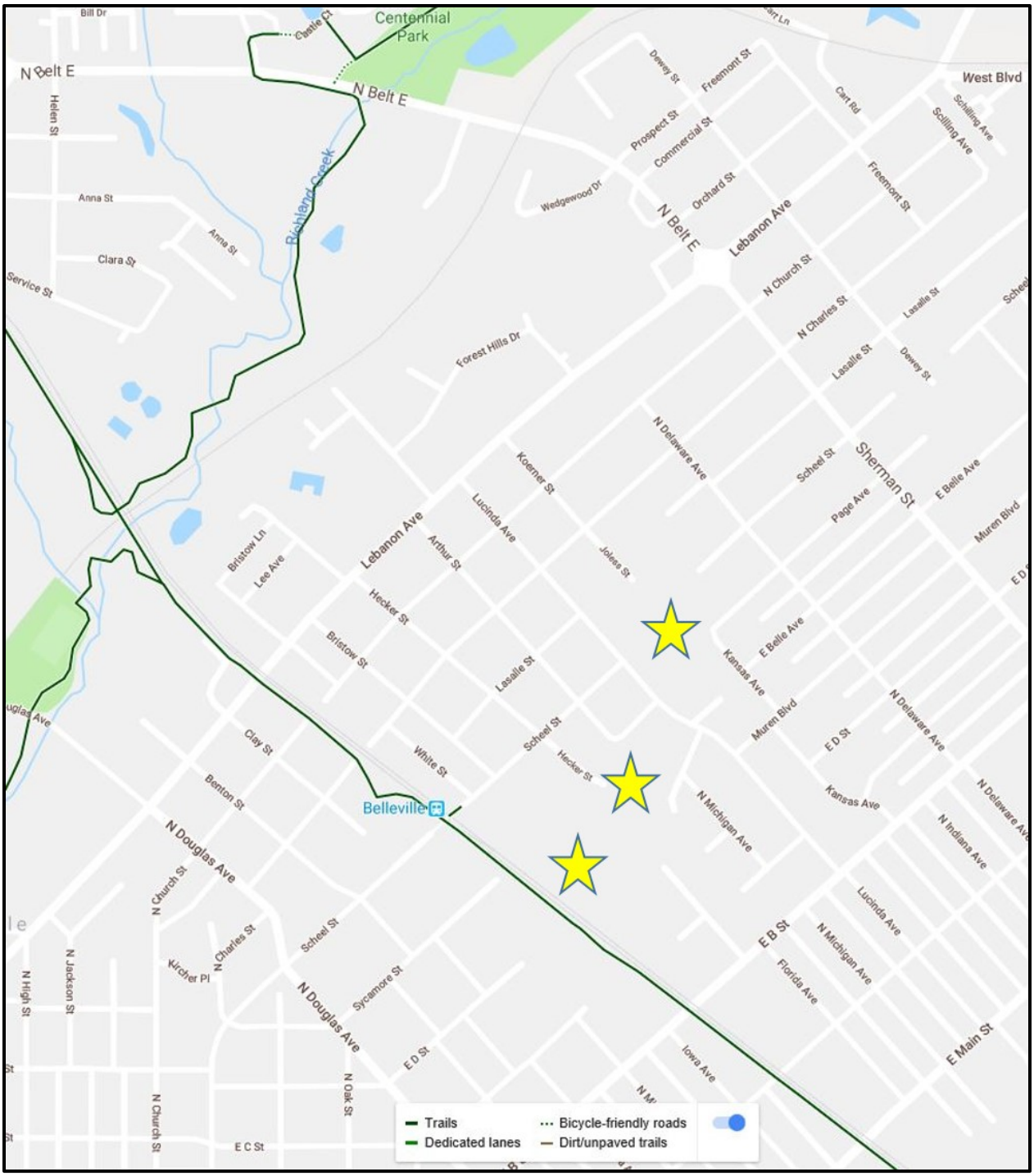

Figure 2. *Metro Bikelink and Richland Creek recreational trails located within project vicinity shown as green lines. Yellow stars indicate proposed detention pond locations.*

The proposed project area is located within an urban setting dominated by homes with yards and large shade trees throughout lining the street corridors. Contiguous undisturbed natural areas within the proposed project area are limited due to the highly developed nature of the city. Richland Creek, north of the proposed project area, offers the most natural undisturbed setting characterized by a riparian forest.

3.3.2 No Action Alternative

The current status of recreational use and aesthetics is expected to remain the same.

3.3.3 Sewer Separation Alternative

During the proposed project construction, recreational trails would not be impacted. The Metro Bikelink trail lies on the south side of the Metro train tracks outside the proposed project area. The Richland Creek Greenway trail is located outside of the proposed project area to the northwest (Figure 2). Public recreational use opportunities would be expected to remain the same during project implementation. The access path for Jefferson Elementary would be impacted by proposed detention pond construction. The path would be removed and relocated as part of this alternative.

Construction of the proposed detention ponds and relief routes would require removal of mature trees. This would change the aesthetics within these areas from a tree dominated landscape to a more maintained grass appearance. During the proposed project construction, roads, driveways, and sidewalks would be disturbed and large equipment and trucks would be seen. This visual impact would be temporary in nature and upon project completion, roads, driveways, and sidewalks would be repaired to pre-project conditions.

3.4 VEGETATION AND WETLANDS

3.4.1 Existing Conditions

Trees, shrubs, and grass lawns dominate the urban setting within the proposed project area where proposed storm sewer lines would be installed. The proposed Orbon Place detention pond upland site contains approximately 12 large diameter mature hardwood trees, including pin oak (*Quercus palutris*), black walnut (*Juglans nigra*), and northern pecan (*Carya illinoensis*) species. A well maintained grass lawn exists around the hardwood trees (Figure 3). A USACE regulatory review was completed on 25 July 2018. This area does not contain jurisdictional Waters of the U.S., per Clean Water Act, Section 404. An additional review of the National Wetlands Inventory Database was conducted and no wetlands were identified within the proposed project feature footprint (USFWS 2018).

Figure 3. *Proposed Orbon Place detention pond location.*

The ‘B’ Street detention pond site is characterized by tree saplings, mature trees, brushy vegetation and dense herbaceous growth. The few mature trees present are widely spaced and fragmented. Mature tree species include; eastern cottonwood (*Populus deltoides*), silver maple (*Acer saccharium*), and hackberry (*Celtis occidentalis*) (Figure 4). Invasive amur honeysuckle (*Lonicera maackii*) and grape vines (*Vitis spp*.) dominate much of the landscape along with perennial herbaceous vegetation. This area is continually disturbed by mowing of vegetation to maintain an underground utility line. A USACE regulatory review was completed on 25 July 2018. This area does not contain jurisdictional Waters of the U.S., per Clean Water Act, Section 404. An additional review of the National Wetlands Inventory Database was conducted and no wetlands were identified within the proposed project feature footprint (USFWS 2018).

Figure 4. *View of proposed 'B' Street detention pond site with dense vegetative growth.*

Figure 5*. View of proposed Jefferson Elementary detention pond site, looking south from Page Ave and Jefferson School.*

The proposed Jefferson Elementary detention pond site is characterized by scattered mature trees and a highly maintained grass area. A well maintained grass lawn exists around the hardwood trees (Figure 5). This area does not contain jurisdictional Waters of the U.S., per Clean Water Act, Section 404. A review of the National Wetlands Inventory Database was conducted and no wetlands were identified within the proposed project feature footprint (USFWS 2018).

3.4.2 No Action Alternative

The residential area where storm sewer lines are proposed to be installed is expected to remain the same. The proposed Orbon Place detention pond site would continue to be maintained by mowing. The 'B' Street detention pond site would be expected to remain as scattered trees and dense vegetation, partially maintained by mowing. The proposed Jefferson Elementary detention pond site would continue to be maintained by mowing and the access path would be undisturbed.

3.4.3 Sewer Separation Alternative

Vegetation within the proposed Orbon Place, 'B' Street, and Jefferson Elementary detention ponds would need to be removed to construct the overflow collection basins. All vegetation would be removed, soil excavated, and re-vegetated with a mixture of native wetland plants and prairie grass species in and around the detention ponds. Soil erosion and sedimentation "best management practices" (BMPs) would be utilized during construction, including shoreline stabilization. BMPs would aid in establishment of desired vegetation. Approximately 2.7 acres would be impacted to establish the proposed Orbon Street detention pond and 1.8 acres of impact for the proposed 'B' Street detention pond. The proposed Jefferson Elementary detention pond would impact approximately 2.9 acres of land (Table 1).

3.5 WILDLIFE RESOURCES

3.5.1 Existing Conditions

Wildlife species typical of an urban setting are found within the area include; songbirds, bats, squirrels, furbearers, and occasional white-tailed deer and wild turkey. The highly developed area limits use of larger mammals due to the constant interaction with people in the surrounding residential neighborhoods and high road densities.

3.5.2 No Action Alternative

Use of the area by various wildlife species would be expected to remain the same under this alternative.

3.5.3 Sewer Separation Alternative

Wildlife species previously mentioned in Section 3.5.1 would be expected to continually use the proposed project area during and post implementation of the proposed action. However, a more diverse array of species, such as turtles, amphibians, and salamanders could potentially utilize the detention ponds as wetland habitat, increasing species diversity on site. Fish species would likely not be able to utilize the site due to routine water level fluctuations.

3.6 THREATENED AND ENDANGERED SPECIES BIOLOGICAL ASSESSMENT

3.6.1 State Listed Species

3.6.1.1 Existing Conditions

The Illinois Department of Natural Resources (IDNR) Ecological Compliance Assessment Tool (EcoCAT) was accessed on 27 July 2018 to determine the potential presence of Illinois State-listed threatened or endangered species or species of concern within the proposed project area. No records of State-listed threatened or endangered species were listed for the area.

3.6.1.2 No Action Alternative

Presence of Illinois State-listed species is not expected to change.

3.6.1.3 Sewer Separation Alternative

Presence of Illinois State-listed species is not expected to change due to implementation of the proposed action.

3.6.2 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.

3.6.2.1 Existing Conditions

The U.S. Fish and Wildlife Service (USFWS) was contacted via USFWS Information for Planning and Consultation (IPaC) website on 25 July 2018, for a list of Federal threatened, endangered and candidate species (Attachment 2) that could potentially be located in the proposed project area (Consultation Code: 03E18100-2018-SLI-0610 and Event Code: 03E18100-2018-E-01402)(Table 2).

Table 2. *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	Hibernates in caves and mines; maternity & foraging habitat: small stream corridors with well-developed riparian woods; upland & bottomland forests
Northern Long-eared Bat	*Myotis septentrionalis*	Threatened	Hibernates in caves and mines; swarming in surrounding wooded areas in autumn. Roosts and forages in upland forests during spring and summer
Least Tern	*Sterna antillarum*	Endangered	Large rivers - nest on bare alluvial and dredge spoil islands
Pallid Sturgeon	*Scaphirhynchus albus*	Endangered	Mississippi and Missouri Rivers
Illinois Cave Amphipod	*Gammarus acherondytes*	Endangered	Streams primarily in the dark zone of caves in parts of the Salem Plateau

Decurrent False Aster	*Boltonia decurrens*	Threatened	Lake shores and banks of streams; lowland areas prone to disturbance
Eastern Prairie Fringed Orchid	*Platanthera leucophaea*	Threatened	Tallgrass or sand prairies, sedge meadows, fens, and occasionally sphagnum bogs

Indiana Bat (Myotis sodalis). Indiana bats hibernate in caves or mines from late-fall to early-spring. The rest of the year during the day, females roost under sloughing bark of larger trees with high amounts of solar exposure, while males are less specific, using smaller trees that may not be suitable for females. During the night, individuals forage above tree canopies of floodplain, riparian, upland forests, and surrounding fields. No suitable winter hibernation habitat is present within the proposed project area. Habitat suitable for summer roosting and foraging likely exists.

Northern Long-eared Bat (*Myotis septentrionalis*). Northern long-eared bats (*Myotis septentrionalis*) hibernate in caves or mines from late-fall to early-spring. The rest of the year they roost under sloughing tree bark, tree crevices, or cavities during the day and forage under tree canopies but above the shrub layer of floodplain, riparian, and upland forests at night. No suitable winter hibernation habitat is present within the project area; however, habitat suitable for summer roosting and foraging may exist.

Least Tern (Sterna antillarum). The least tern is common on bare alluvial and dredged spoil islands. Historically, terns nested on sparsely-vegetated sandbars along major rivers in the Central United States; however, much of their natural habitat has been lost because of broad-scale changes to natural river systems. No suitable habitat exists within the project area.

Pallid Sturgeon (Scaphirhynchus albus). The pallid sturgeon is found in the Mississippi River downstream of its confluence with the Missouri River. Pallid Sturgeon forage for insects, crustaceans, snails, clams, and fish along the bottom of large rivers (USFWS 2016). These fish are most frequently caught over a sand bottom, which is the predominant bottom substrate within the species' range on the Mississippi River. Tag returns have shown that the species may be using a range of habitats in off-channel areas and tributaries of the Mississippi River. Loss of habitat has occurred due to anthropogenic changes which has ultimately decreased the availability of spawning habitat, reduced larval and juvenile rearing habitat, availability of seasonal refugia, and availability of foraging habitat. No suitable habitat exists within the proposed project area.

Illinois Cave Amphipod (Gammarus acherondytes). The Illinois cave amphipod is small, cave-dwelling crustacean. They live exclusively within cold water streams within interior portions of caves. Currently this species is only known to exist within Monroe County, near Waterloo, Illinois. No suitable habitat exists within the proposed project area.

Decurrent False Aster (Boltonia decurrens). Decurrent false aster is a perennial plant that exhibits annual and biennial lifecycles. Decurrent false aster is found on moist, sandy, floodplains and prairie wetlands along the Illinois and Mississippi Rivers. It relies on periodic disturbances such as flooding to scour away other plants that compete with it for habitat. The decurrent false aster is threatened due to excessive silting, intensive agricultural practices, floodplain disconnection which limits flooding disturbances, and herbicides. No suitable habitat exists within the proposed project area.

Eastern Prairie Fringed Orchid (Platanthera leucophaea). Eastern prairie fringed orchid habitat includes various wetland habitat including meadows, marsh edges and bogs. Full sun exposure is required to allow for optimal growth. Loss of wetland habitat is the main contributor to the decline of this species. Habitat requirements for this species are not found within the proposed project area.

3.6.2.2 No Action Alternative

Without project implementation the existing urban and wooded habitat found within the proposed project area is expected to remain fairly stable. The proposed Orbon Place and Jefferson Elementary detention pond sites would continue to be maintained through mowing and the large mature trees would remain for the short term. Over time the larger mature trees would succumb to mortality, however this would depend on unforeseen environmental factors. The proposed 'B' Street detention pond site would remain as scattered mature trees and partially maintained through mowing. Invasive species would likely remain on site and inhibit tree growth.

Habitat for the least tern, pallid sturgeon, decurrent false aster and eastern prairie fringed does not currently exist on site, therefore no negative impacts would occur as a result of the No Action Alternative.

Potential indirect impacts of the existing sewer system could potentially impact water quality within the watershed, affecting the quality of water within aquifers of adjacent watersheds. This has the potential to affect the Illinois cave amphipod habitat within underground cave systems within St. Clair County.

Potential Indiana and northern long-eared bat roosting and foraging habitat exists within the proposed project area. Under the No Action Alternative, suitable habitat for these bats is expected to remain fairly stable in the short term. However, with no foreseeable action, invasive species would continue to spread and mature trees would succumb to mortality. Foraging habitat would likely have no change, however potential roosting habitat would potentially diminish over time due to tree loss.

3.6.2.3 Sewer Separation Alternative

The Sewer Separation Alternative would involve removal of the large diameter trees at the proposed Orbon Place detention pond site and the removal of scattered trees at the proposed 'B' Street and Jefferson Elementary detention pond sites. These sites would transition into wetland habitat consisting of native prairie, wet prairie, emergent and open water habitat through construction of the detention ponds. Rainfall dependent storm water flows would directly impact the amount of open water habitat present during a seasonal timeframe. Higher rainfall events would allow for a greater amount of open water to be present during a given time period, water levels within the detention ponds would be dependent upon existing ground and surface water conditions as well.

Under the proposed implementation of the Sewer Separation Alternative, suitable habitat for the least tern and pallid sturgeon would not be created or proposed to be impacted, therefore, a **"no effect"** determination has been made.

A potential increase in suitable habitat would be developed for decurrent false aster and eastern prairie fringed orchid, which require varying types of wetland habitat to exist, therefore a **"may affect, but not likely to adversely affect"** determination has been made for these species.

The Illinois cave amphipod habitat would not be directly impacted under the Sewer Separation Alternative, however, positive indirect impacts would exist. Detrimental effects of groundwater pollution from pesticides as well as animal and human waste could potentially threaten the quality of existing cave

stream habitat adjacent to the East Creek Watershed. The detention ponds would improve storm water runoff filtration, improving ground water quality. Separation of storm water flows from the existing sewer system would reduce overall waste water discharge quantities into the watershed, improving water quality. Therefore, it has been determined that the Proposed Action, **"may affect, but is not likely to adversely affect"** the Illinois cave amphipod.

Potential suitable roosting habitat for Indiana bat would be impacted through implementation of the Sewer Separation Alternative due to the proposed tree removal activities. However, tree removal would only occur during the non-roosting season. Tree cutting would be restricted from April 1 through September 30 to minimize potential effects to bat roosting habitat. Bat foraging habitat would be indirectly impacted during project implementation, however the proposed detention pond sites would serve as a potential drinking water source for Indiana and northern long-eared bats. Therefore, it has been determined that the Proposed Action, **"may affect, but is not likely to adversely affect"** the Indiana bat.

Implementation of this project may affect the northern long-eared bat (NLEB) population. However, there are no project effects beyond those previously disclosed in the USFWS range-wide programmatic biological opinion on implementing the final 4(d) rule dated January 5, 2016, signed by Lynn Lewis. Any taking that may occur incidental to this project is not prohibited under the final 4(d) rule (50 CFR §17.40(o)). This project is consistent with the description of the proposed action in the programmatic biological opinion, and activities that do not require special exemption from taking prohibitions applicable to the NLEB; therefore, the programmatic biological opinion satisfies the Corps of Engineer's responsibilities under ESA section 7 (a)(2) relative to the NLEB for this project (USFWS 2016).

3.7 BALD AND GOLDEN EAGLE

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.

3.7.1 No Action Alternative

No impacts to Bald Eagles would be expected under the No Action Alternative.

3.7.2 Sewer Separation Alternative

No known bald eagle nests are located within the proposed project area vicinity. If a nest were discovered during design or proposed construction, USACE would coordinate with the U.S. Fish and Wildlife Service for protection measures.

3.8 CULTURAL AND TRIBAL RESOURCES

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. Cultural resources also include Traditional Cultural Properties (TCPs), which are aspects of the landscape that are part of traditional lifeways and practices and are considered important to a community. The National Historic Preservation Act (NHPA) is the major piece of federal legislation that mandates that federal agencies consider how undertakings could affect significant cultural resources.

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 26 Tribal organizations that have ties to, or an interest in, the District's region.

3.8.1 No Action Alternative

Cultural resources within the proposed project area would remain at risk due to ongoing urban development activities not associated with the scope of this assessment.

3.8.2 Sewer Separation Alternative

The proposed project area has a moderate to low potential to contain potentially significant historic properties (archaeological remains). The placement of storm sewers alongside existing sewer lines below streets and pavements are unlikely to affect intact historic properties. The creation of storm water detention ponds, however, may encounter previously unidentified historic properties. The proposed location of Orbon Place Detention Phase 3 was previously a mobile home park with attendant roads and foundation pads. It is likely that its creation and removal have disturbed any historic properties that may have existed in the area. The 'B' Street Detention Phase 1 and Jefferson Elementary Detention Phase 2 sites, however, are located on land that has not been disturbed by any reported activity, except potentially some utility lines. Further investigations to identify any unknown historic properties are required.

The Corps 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. Should these investigations identify any potentially significant archeological remains, the Corps would immediately notify the IL SHPO and apprise them of the discovery. After consultation with the IL SHPO, should avoidance of the potentially significant remains not be feasible, additional archaeological fieldwork would 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 Native American tribes.

Should any potentially significant archaeological remains be uncovered incidentally during construction (after the scheduled archaeological investigations have been completed) 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.

3.9 SOCIOECONOMICS AND TRANSPORTATION

3.9.1 Existing Conditions

The City of Belleville has a population of approximately 41,649 residents according to the 2017 U.S. Census Bureau Data. The population has decreased nearly 3,000 since the 2010 estimates. Median household income in Belleville was $42,348; comparatively, the St. Clair County average was estimated at $50,006 (2016 Census data). The Belleville civilian labor force (age 16 and over) consists of approximately 61% of the total population.

The proposed project area consists primarily of residential homes and a few small businesses i.e. Belleville Recycling, Chip Services LLC., and Belleville Quick Stop. Schools located within the vicinity include: St. Teresa Catholic School and Jefferson Elementary School.

Transportation routes within the proposed project area consist of residential roads, Highway 161, Lebanon Avenue, East B Street as well as the Metrolink public transit system.

3.9.2 No Action Alternative

Current population levels within the City of Belleville would be expected to remain constant and income levels would remain unchanged under the No Action Alternative. No impacts would be expected to occur related to transportation.

3.9.3 Sewer Separation Alternative

No significant socioeconomic or transportation impacts are expected to occur as a result of the proposed Sewer Separation Alternative. Temporary road closures and detours may be necessary to facilitate construction equipment and vehicles. The access path to Jefferson Elementary would be removed and relocated during construction. Alternate traffic routes may cause temporary vehicular congestion during construction, however these are anticipated to be minimal in scale. The three phased implementation approach would minimize transportation impacts to the area as a whole.

3.10 HAZARDOUS, TOXIC, AND RADIOACTIVE MATERIALS

3.10.1 Existing Conditions

U.S. Army Corps of Engineers (USACE) regulations (ER 1165-2-132 and ER 200-2-3) and District policy require 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 Environmental Condition of Property (ECP) Assessments. The Corps 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).

A Phase I site assessment was conducted by USACE personnel for the East Creek Sewer Separation Project using the following ASTM Standards:

- E1527-13: 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 the Phase I ESA was to identify, to the extent feasible in the absence of sampling and analysis, the range of contaminants (i.e. Recognized Environmental Conditions[1] or RECs) within the scope of the U.S. Environmental Protection Agency's (USEPA) Comprehensive Environmental Response, Compensation and Liability Act (CERCLA) and petroleum products.

All proposed improvements and construction projects were evaluated for potential soil contamination, groundwater quality, surface water quality, and issues related to hazardous substance uptake by biota. Site visits were conducted to observe present conditions and check for the presence of chemical spill residue, die-back of vegetation, and prior environmentally hazardous activities. Historical aerial photography of the vicinity and U.S. Geological Survey (USGS) maps are also used to study drainage patterns and topography.

3.10.2 No Action Alternative

Under the No Action Alternative, impacts to known HTRW sites within the proposed project area are not anticipated.

3.10.3 Sewer Separation Alternative

The St. Louis District Phase I ESA for the East Creek Sewer Project revealed potential RECs within the proposed project and surrounding areas. These potential RECs within the construction area should be noted in the pre-construction meetings however, they are considered to be a minimal risk to the project.

3.11 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 3). EPA regulates these pollutants by developing human health-based or environmentally-based permissible pollutant concentrations. EPA then publishes the results of air quality monitoring, designating areas as meeting (attainment) or not meeting (nonattainment) the standards or as being maintenance areas. Maintenance areas are those areas that have been re-designated as in attainment from a previous nonattainment status. A maintenance plan establishes measures to control emissions to ensure the air quality standard is maintained in these areas.

Table 3. *Six pollutants and their standard criteria designated by the U.S. EPA (USEPA 2018).*

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	1 hour	100 ppb	98th percentile of 1-hour daily maximum

dioxide			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

3.11.1 Existing Conditions

The region of St. Clair County, Illinois, is currently in attainment for all EPA air quality standards, except Particulate Matter 2.5 (1997 Standard) classified as moderate non-attainment (USEPA, 2018).

Noise levels within the proposed project area experience variations size and density depending on the time of day within a 24-hour period. The Metrolink train traffic, light industry, recreational trail users, schools, and residential homes contribute to the overall amount of noise experienced within the proposed project area. Urban noise levels generally do not exceed 70 decibels (dB), but may attain 90 dB or greater in urban areas that experience high transportation levels or are influenced by industrial activity (Figure 6).

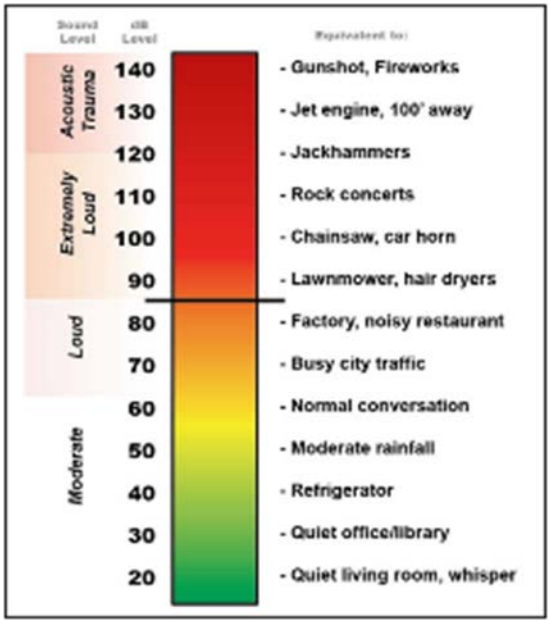

Figure 6. *Examples of the sound level and decibel (dB) level of variety of sources.*

3.11.2 No Action Alternative

Air quality within the City of Belleville would be expected to be similar to current conditions. Industrial, commercial, and residential development within the City of Belleville is expected to remain at its current level. Thus, overall noise levels are expected to remain near the same levels as well. However, any land use type change could result in a decrease or increase within localized areas of the city.

3.11.3 Sewer Separation Alternative

Air quality in the vicinity of the work area would be expected to be similar to current conditions. Equipment used for construction activities would generate emissions from the use of petroleum products but impacts would be temporary, minor, and local in nature.

Noise receptors consisting of residential areas or single residences are located within areas of proposed construction activities. Short-term noise impacts would be generated by the use of various types of construction equipment and machinery. These impacts would be intermittent in nature. In the vicinity of residential areas, these impacts would be alleviated by limiting construction operations to daylight hours when practicable. Overall, impacts would be temporary, minor, and local in nature.

3.12 PRIME FARMLAND

3.12.1 Existing Conditions

Prime farmland is of major importance in meeting the Nation's short- and long-range needs for food and fiber. The acreage of high-quality farmland is limited and the U.S. Department of Agriculture recognizes that government at local, State, and Federal levels, as well as individuals, should encourage and facilitate the wise use of our Nation's prime farmland. Prime farmland soils, as defined by the U.S. Department of Agriculture, are soils that are best suited to food, feed, forage, fiber, and oilseed crops. Prime farmland soils may presently be used as cropland, pasture, or forestland or for other purposes. More information about the criteria for prime farmland can be obtained at the local office of the Natural Resources Conservation Service. A recent trend in land use has been the conversion of prime farmland to urban and industrial uses.

The major soil types within the proposed project area are considered "not prime farmlands" according to the Natural Resources Conservation Service (NRCS) Soil Survey Geographic (SSURGO) Database. However, a small portion of the proposed project area has a Wakeland silt loam soil type that is considered "prime farmland if drained and either protected from flooding or not frequently flooded during the growing season" (NRCS 2018).

3.12.2 No Action Alternative

With the No Action Alternative, impacts to prime farmland within the proposed project area are not anticipated. Currently, the majority of the proposed project area is urban with a small amount of forested habitats. Land use change is not anticipated.

3.12.3 Sewer Separation Alternative

Soil types classified as "prime farmland if drained and either protected from flooding or not frequently flooded during the growing season" would be impacted with selection of this alternative. Impacts to these areas would occur at the proposed 'B' Street and Jefferson Elementary detention pond sites and

associated storm sewer relief route footprint, approximately 5 acres in size. However, the existing "prime farmland" soil type is currently located in an urban setting, consisting of residential homes, yards and wooded areas. Agricultural lands do not exist within the urban setting, therefore, impacts to these land types would not occur under this alternative.

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 current population of the City of Belleville is approximately 41,649 residents. The minority races consist of: 25.4 % African- American, 1.9% Hispanic or Latino, .3% American Indian, 1.1% Asian and .1% Pacific Islander. The total percentage of minority residents is approximately 29%. Approximately 16.9% of the population within the City of Belleville is considered to be living at the poverty level (U.S. Census Data 2016).

Detrimental impacts to low income or minority residents are not expected to occur as a result of the proposed actions. The proposed alternative would not disproportionally affect low income or minority populations. The proposed storm sewer overflow system would have overall positive benefits to this population dynamic by potentially reducing exposure to harmful bacteria associated with sewer backups and street overflows.

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

This section identifies possible cumulative effects of the considered alternatives when combined with past trends and other ongoing or expected future plans and projects. Cumulative effects result from the proposed action when added to other past, present, and reasonably foreseeable projects or actions. Cumulative effects are not caused by a single project, but include the effects of a particular project in conjunction with other projects (past, present, and future) on the particular resource.

The original sewer system in the City of Belleville was constructed in 1912. This system was constructed as a combined sewer system, receiving storm water overflows as well as sanitary wastewaters through a single-pipe system. Other components of the city's sewer system include a waste water treatment plant that was constructed in 1938, receiving upgrades every ten years to meet the increasing demands of population growth and industry. The treatment plant is currently being expanded and upgraded to increase the plant treatment capacity to 12.8 MGD from an existing 8 MGD. This upgrade takes into account future capacity needs as potential residential, commercial, and industrial growth occur (BWWD 2018).

Ongoing planned sewer system upgrades include construction of a lift station, relief sewers, and sanitary sewer replacement. These improvements are designed to improve overall water quality of the city and reduce the amount of combined sewer overflows. These upgrades are being funded by the Clean Water State Revolving Fund (SRF), a program administered by U.S. Environmental Protection Agency.

The proposed Sewer Separation Alternative would contribute to the City of Belleville's Long Term Control Plan (LTCP) goal, which addresses the need to eliminate combined sewer overflows for continued health and clean water for the City of Belleville as well as downstream communities. The East Creek CSO improvements (Sewer Separation Alternative) described within this document would address the long term sewer and sanitary upgrade needs for the City of Belleville, which are currently ongoing. No major cumulative adverse impacts are expected to result from implementation of the proposed project.

7 COORDINATION

Notification of the Draft Environmental Assessment and unsigned Finding of No Significant Impact was sent to officials, agencies, organizations, and individuals for public review and comment (Table 4). Additionally, an electronic copy was available during the public review period (24 August – 24 September 2018) on the USACE St. Louis District's website at:

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

Please note that the Finding of No Significant Impact is unsigned in the draft version of the EA and would 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 would continue, as required, throughout the execution of the proposed project.

Table 4. *A letter regarding the availability of a draft Environmental Assessment and unsigned FONSI for the proposed sewer separation project was sent to the following entities:*

Matt Mangan Acting Field Supervisor U.S. Fish and Wildlife Service Marion Illinois Sub-office 8588 Route 148 Marion, IL 62959	Adam Rawe Resource Planner Impact Assessment Section Illinois Department of Natural Resources 1 Natural Resources Way Springfield, IL 62702
Sierra Club Illinois Chapter 70 E Lake Street, Suite 1500 Chicago, IL 60601	The Nature Conservancy Chicago Office 8 South Michigan Avenue Suite 900 Chicago, Illinois 60603
Traci McCauley Natural Resources Illinois Department of Agriculture 801 Sangamon Ave. P.O. Box 19281 Ag Bldg – FL 001 Springfield, IL 62794	Jeff Kruchten Acting Illinois State Historic Preservation Office Illinois Department of Natural Resources 1 Natural Resources Way Springfield, IL 62702
James F. Clayborne Jr. State Senator 57th District 329A Capitol Building Springfield, IL 62706	Jay C. Hoffman State Representative House District 113 261-S Stratton Office Building Springfield, IL 62706
Richard Durbin U.S. Senator IL 711 Hart Senate Building Washington, D.C. 20510	Tammy Duckworth U.S. Senator IL 524 Hart Senate Office Building Washington, D.C. 20510
Mike Bost U.S. House of Representatives 12th Congressional District of Illinois 1440 Longworth House Office Building Washington, DC 20515	Ivan Dozier State Conservationist NRCS Illinois State Office 2118 W. Park Court Champaign, IL 61821
Ronald Moore Izaak Walton League of America-Illinois Division 55 Ridgecrest Drive Decatur, IL 62521-5425	Heartlands Conservancy 406 East Main Mascoutah, Illinois 62258
Federal Emergency Management Agency 536 South Clark Street, 6th Floor Chicago, IL 60605 312-408-5500	Illinois Environmental Protection Agency 1021 N Grand Ave E Springfield, IL 62702

Alan Walts Office of Enforcement and Compliance Assurance U.S. EPA-Region 5 77 W. Jackson Blvd. Chicago, IL 60604	Belleville News Democrat 120 South Illinois P.O. Box 427 Belleville, IL 62222
E. Royce Carlisle Director of Waste Water Treatment Plant & Sewer Lines 450 Environmental Drive Belleville, IL 62220	Matt Klosterman Belleville District #118 105 West A. Street Belleville, IL 62220

8 ENVIRONMENTAL COMPLIANCE

Guidance	Degree of 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	FC[3]
Farmland Protection Policy Act, 7 U.S.C. 4201-4208	FC
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	FC[3]
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. Full compliance would be attained after all required archaeological investigations, reports and coordination have been completed.
2. Full compliance would be attained upon completion of any permitting requirements or coordination with other agencies.
3. Full compliance would be attained upon signing of the NEPA decision document.

9 LIST OF PREPARERS

- Alison Anderson, Ph.D., Environmental Coordinator
- Chris Hopfinger, Environmental Coordinator
- Rick Archeski, HTRW
- Mark Smith, Ph.D., Cultural and Tribal Coordinator
- Megan O'Brien, Lead Planner
- Ashley Rasnic, Project Manger

10 WORKS CITED

Belleville Waste Water Division (BWWD). 2018. Website, https://www.belleville.net/364/Wastewater

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FINDING OF NO SIGNIFICANT IMPACT

1. In accordance with the National Environmental Policy Act, I have reviewed and evaluated the documents relevant to the proposed East Creek Sewer Separation Project located within the City of Belleville, Illinois. The work involves the installation of 13,740 linear feet of new storm sewer pipe-line and establishment of 3 detention ponds (7.4 acres), which includes excavation and removal of approximately 56,000 cubic yards of earthen material within an urban area.

   The proposed East Creek Sewer Separation Project Area is located within the city limits of Belleville, St. Clair County Illinois. The project is generally bounded by Richland Creek on the northwest and Belleville Metrolink tracks along the southern perimeter.

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

   a. Sewer Separation Alternative (Tentatively Selected Plan) - The St. Louis District, U.S. Army Corps of Engineers (USACE) would provide Federal construction assistance to the City of Belleville, Illinois, to separate sanitary and storm water flows from an existing combined sewer system within the East Creek Watershed.

   b. No Action Alternative- Under this alternative, no federal action would take place and the existing combined sewer system would remain intact.

3. The possible consequences of the two alternatives have been studied for physical, environmental, cultural, social, economic, aesthetic, and recreational effects. Significant factors evaluated as part of my review include:

   a. No adverse impacts to socioeconomic, transportation, and recreation resources would occur as a result of the project.

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

   c. The proposed sewer separation project would have no adverse impact upon archaeological remains or historic properties.

   d. Potential recognized environmental conditions (RECs) were discovered during the USACE conducted Phase 1 environmental site assessment. However, these RECs pose minimal risk to the proposed project and would be identified during pre-construction meetings.

   e. No significant impacts to natural resources are anticipated, including fish and wildlife resources and wetlands. The proposed construction would have no adverse impacts to the physical environment (e.g., noise, air and water quality) nor would the project adversely impact low-income or minority populations.

f. All tree cutting activities would take place between 1 October and 31 March of any given year, during the non-active roosting season for Indiana and northern long-eared bats. Any alteration to the tree clearing restriction dates of 1 April through 30 September will require further coordination between USFWS and USACE.

g. The "No Action" alternative was evaluated and would be unacceptable to recommend as it does not meet the project purpose of separating the sanitary and storm water flows to alleviate the human health threats and improve overall water quality within the East Creek Watershed.

4. A Clean Water Act, Section 404 permit is not required, per USACE Regulatory review. 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 Tentatively Selected Plan 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)

Bryan K. Sizemore
Colonel, U.S. Army
District Commander

ATTACHMENT 1: STATE AGENCY CORRESPONDENCE

ATTACHMENT 2: FEDERAL AGENCY CORRESPONDENCE

ATTACHMENT 3: CULTURAL & TRIBAL CORRESPONDENCE