

**APPENDIX L**  
**DEPARTMENT OF TRANSPORTATION**  
**FEDERAL AVIATION ADMINISTRATION**  
**FINAL SECTION 4(f) AND SECTION 6(f)**  
**EVALUATION**  
**CHICAGO O'HARE INTERNATIONAL AIRPORT**  
**CHICAGO, ILLINOIS**  
**JULY 2005**

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## L.1 INTRODUCTION

This Appendix includes the Final Section 4(f) and 6(f) Evaluation. A Draft Section 4(f) and 6(f) Evaluation (Evaluation) was submitted for public and agency review on June 24, 2005. A 45-day comment period was provided on the Draft Evaluation, which ended on July 5, 2005. Comments submitted on the Draft Section 4(f) and 6(f) Evaluation are incorporated into this Final Evaluation and responded to by FAA in **Attachment L-1**.

The FAA is considering Federal actions requested to support a proposal by the City of Chicago to modernize Chicago O'Hare International Airport. The City seeks FAA approval to amend its Airport Layout Plan (ALP) and seeks Federal funding for improvements to address existing and future delay and capacity problems. The FAA prepares Environmental Impact Statements to take a hard look at and disclose potential environmental impacts. In order for proposed improvements depicted on an ALP to be considered eligible for potential Federal funding, the FAA must complete the EIS process and issue a favorable Record of Decision (ROD).

In this instance, the FAA has undertaken an Environmental Impact Statement (EIS) pursuant to a request by the City of Chicago to modernize Chicago O'Hare International Airport, which is hereby incorporated by reference into this Section 4(f) and Section 6(f) Evaluation. The EIS contains the purpose and need, alternatives, an inventory and evaluation of the affected environment, and environmental consequences of the proposed action and its reasonable alternatives. Specifically, **Chapter 4, Affected Environment** of the EIS contains a comprehensive inventory of the economic, social, natural, and physical environment within the study area. The inventory and evaluation of the existing environment provided the framework necessary to assess the potential impacts of the proposed airport development alternatives as part of the environmental consequences analysis, contained in **Chapter 5, Environmental Consequences** of this EIS.

The FAA presented a detailed analysis of the potential environmental impacts resulting from the construction and operation of the proposed action and its reasonable alternatives in the EIS. The EIS considered the environmental consequences of the proposed action and its reasonable alternatives based on four phases of development. At the end of Construction Phase I, the first of the proposed new runways and associated development would be operational. At the end of Construction Phase II, the land acquisition would be completed and the second major phase of development would become operational. The final phase (Build Out + 5) reflects conditions anticipated to occur five years after Build Out. As such, the last two phases (Build Out and Build Out + 5) evaluate the operational implications of all proposed development, whereas earlier phases consist of construction and operation of the interim phases of the project. A project location map is provided on **Exhibit L-1**.

Over 20 different environmental impact categories were examined in **Chapter 5** of this EIS, with **Chapter 6** presenting the cumulative impacts. Among those impact categories that were examined are the potential direct impacts (use) and indirect impacts (constructive use) of the development alternatives (1) upon lands protected under the Department of Transportation Act, Section 303, Title 49 U.S. Code, commonly referred to as "Section 4(f)"; and (2) upon lands purchased or developed using monies from the Department of Interior Land and Water Conservation Fund Act (LAWCON), more commonly known as "Section 6(f)".



Source: StreetMap, 2003. United States Census Bureau, Census 2000.



Chicago O'Hare International Airport

**O'Hare Modernization  
Section 4(f) and 6(f) Evaluation**

**O'Hare International Airport  
Location Map**

► Exhibit L-1

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## L.1.1 Applicable Regulatory Requirements

The purpose of this Final Section 4(f) and 6(f) Evaluation is to: (1) identify and evaluate the potential impacts to Section 4(f) and 6(f) resources that would result from implementation of the proposed action; (2) complete a review, to determine if any feasible and prudent alternative to the project exists; and (3) identify that all possible steps have been taken to minimize such adverse effect.

This document addresses both direct and indirect impacts to applicable recreational/park and historic properties in the EIS study area.

### L.1.1.1 Section 4(f) Lands

Section 4(f) legislation,<sup>1</sup> as established under the U.S. Department of Transportation Act of 1966, states:

The Secretary may approve a transportation program or project (other than any project for a park road or parkway under section 204 of title 23) requiring the use of publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance, or land of an historic site of national, State, or local significance (as determined by the Federal, State, or local officials having jurisdiction over the park, area, refuge, or site)] only if—

- (1) there is no prudent and feasible alternative to using that land; and
- (2) the program or project includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use.

As noted above, this legislation provides for the protection of certain publicly-owned lands, including public parks, recreation areas, wildlife and waterfowl refuges of national, state, or local significance, and the protection of any land of a historic site of national, state, or local significance. Programs or projects requiring the use of Section 4(f) lands will not be approved by the FAA unless there is no prudent and feasible alternative to the use of such land, and such programs include all possible planning to minimize harm resulting from the use. FAA must also address properties listed on or eligible for listing on the National Register of Historic Places (NRHP) in accordance with Section 106 of the National Historic Preservation Act (NHPA) of 1966.

### L.1.1.2 DOI Section 6(f) Lands

Special procedures are also required when development would affect lands purchased or developed using Department of the Interior (DOI) Land and Water Conservation Fund Act (LAWCON) monies. Section 6(f) of the LAWCON Act of 1965 (Public Law 88-578), codified at Title 16 U.S. Code, Section 4601-8(f)(3), commonly referred to as "Section 6(f)," states:

No property acquired or developed with assistance under this section shall, without the approval of the Secretary [of the Interior], be converted to other than public outdoor recreation uses. The Secretary shall approve such conversion only if he finds it to be in accord with the then existing comprehensive statewide outdoor recreation plan and only upon

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<sup>1</sup> As part of an overall recodification of the DOT Act, Section 4(f) was amended and codified in 49 U.S.C. Section 303(c).

such conditions as he deems necessary to assure the substitution of other recreation properties of at least equal fair market value and of reasonably equivalent usefulness and location.

The authority to approve Section 6(f) conversions has been delegated to the Regional Directors of the National Park Service (NPS). As a prerequisite to conversion approval, the FAA must demonstrate to the DOI that it has satisfactorily completed the Section 4(f) process. Additionally, the FAA must provide its Section 4(f) findings to the DOI so that it can make the requisite Section 6(f) findings. Part of the Section 4(f) process requires the examination of prudent and feasible alternatives to using the land and the development of all possible planning measures to minimize harm to the Section 6(f) recreational facility or area resulting from the use. Similarly, one of the prerequisites that must be met before NPS will consider the conversion request is that "all practical alternatives to the proposed conversion have been evaluated."<sup>2</sup>

### **L.1.2 Purpose and Need**

CEQ Regulations implementing NEPA require that an EIS specify the underlying purpose and need to which an agency is responding in proposing alternatives, including the proposed action, (40 CFR §1502.13). Because airport capacity improvements in the National Airspace System (NAS)<sup>3</sup> are dependent upon the initiatives of individual airport sponsors, the FAA gives special consideration to the purposes of the airport sponsor. The airport sponsor, in this case the City of Chicago, has prepared a Master Plan for O'Hare describing specific aviation and air transportation problems facing the Chicago region today and in the future.

**Chapter 2, Purpose and Need**, of this EIS defines the purpose and need for the proposed action as follows:

To address the projected needs of the Chicago region by reducing delays at O'Hare, thereby enhancing capacity of the NAS, and ensuring that future terminal facilities and supporting infrastructure can efficiently accommodate airport users.

#### **L.1.2.1 The City's Proposed O'Hare Modernization Program**

The City's proposal, referred to as the O'Hare Modernization Program (OMP), provides for reconfiguration of the airfield as shown in **Exhibit L-2**, along with associated terminal and support facilities, and related land acquisition. The FAA determined that the proposed action involves major Federal actions requiring preparation of an EIS. On July 17, 2002, the FAA issued a Notice of Intent to prepare an EIS and conduct scoping, including public scoping meetings. As a result, the FAA gained insight at the start of this process from other Federal agencies, as well as state and local jurisdictions, advocacy groups and the general public, as to issues of importance for consideration in this EIS.

The Sponsor's proposed airfield projects include the realignment of three runways, and the construction of one new runway. For FAA purposes, realignment involves decommissioning of existing runways and construction of replacement runways. The four replacement runways include Runways 9L/27R, 9C/27C, 10C/28C, and 10R/28L. The three existing runways to be

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<sup>2</sup> 36 C.F.R. § 59.3

<sup>3</sup> The National Airspace System (NAS) is the common network of U.S. airspace; air navigation facilities, equipment, services, airports, or landing areas; aeronautical charts, information, and services; rules, regulations, and procedures; technical information, manpower, and materials, all of which are used in aerial navigation.

decommissioned include Runways 18/36, 14L/32R and 14R/32L. In addition, two existing runways (Runways 9L/27R and 9R/27L), whose future designations would be 9R/27L and 10L/28R, respectively, would be extended. Further, existing Runways 4L/22R and 4R/22L would remain for additional operational flexibility. This 8-runway airfield layout will have six parallel runways in an east-west orientation and two crosswind runways in a northeast-southwest direction. The Federal actions associated with the proposed development include:

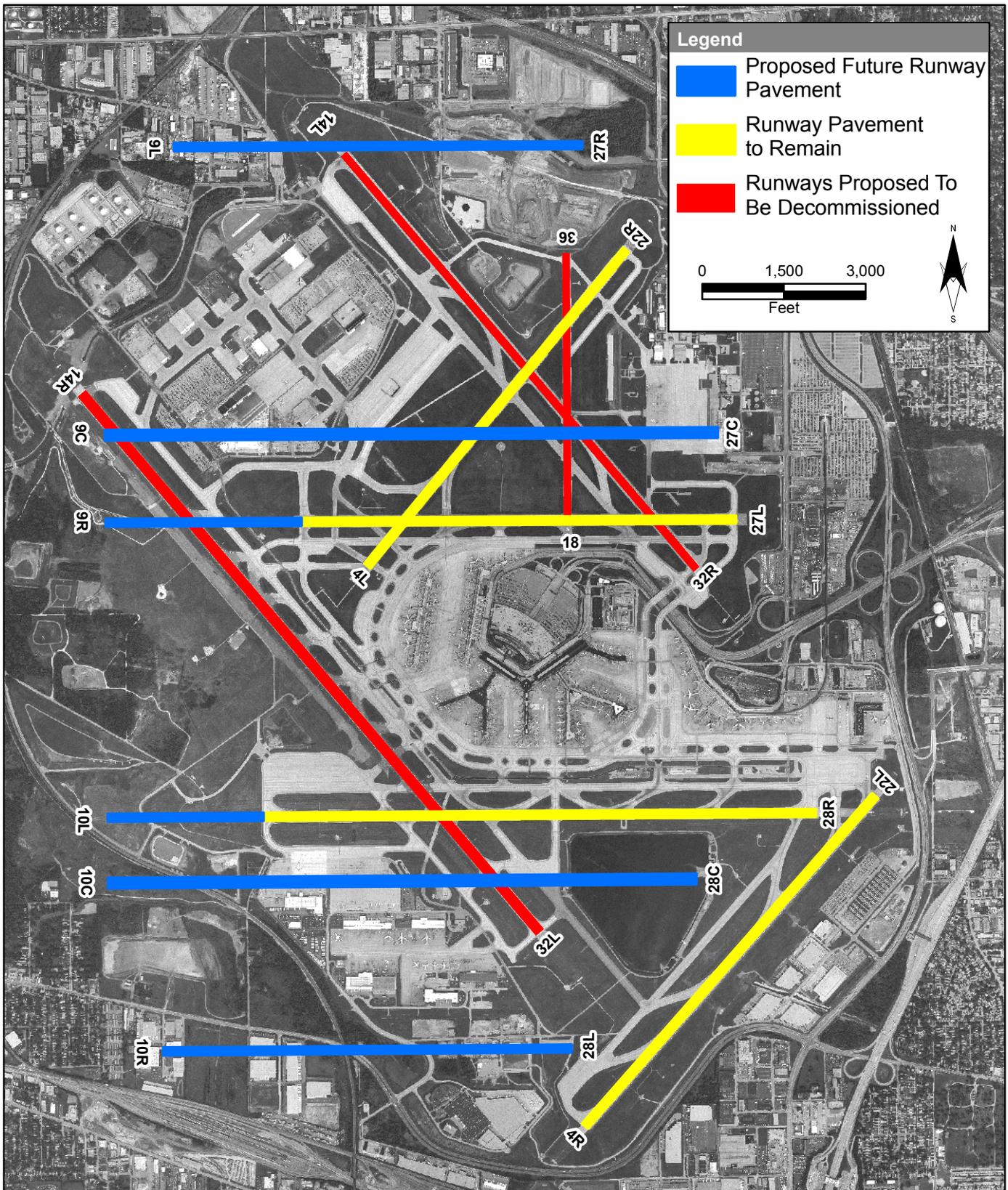
- Approval of an Airport Layout Plan (ALP) depicting the proposed project,
- Eligibility for Federal funding under the Airport Improvement Program (AIP) and to impose and expend passenger facility charges (PFCs),
- Establishment of air traffic control and airspace management procedures designed to affect the safe and efficient movement of air traffic to and from the proposed runways, as well as in the airspace surrounding the airport,
- Establishment of flight procedure modifications,
- Certifications as to the safety of instrumentation, procedures, and airfield operations, and
- Installation and/or relocation of navigational aids associated with the proposed new and relocated runways.

Further discussions of the Purpose and Need for the proposed improvements is provided in **Chapter 2, Purpose and Need**, herein incorporated by reference into this Evaluation. The proposed improvements are also further discussed in **Chapter 3**, and **Appendix E, Alternatives**, of this EIS.

### **L.1.3 Alternatives**

Consideration of the range of reasonable alternatives to the proposed airport improvements was made through the EIS process. Federal regulations at 40 CFR 1502.14(a) require that the EIS identify and evaluate all reasonable alternatives that might accomplish the objectives of a proposed project. More information regarding the alternatives can be found in **Chapter 3, Alternatives**, of the EIS, which is herein incorporated by referenced in this Evaluation.

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Source: ALP Drawing Set, Ricondo and Associates Inc. (CCT), 2004.



Chicago O'Hare International Airport

**O'Hare Modernization  
Section 4(f) and 6(f) Evaluation**

**Existing and Proposed Future  
Runways (Sponsor's Proposal)  
Alternative C**

► Exhibit L-2

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The Council on Environmental Quality (CEQ) regulations at 40 CFR 1502.14(a) require EISs to discuss in detail only alternatives that are reasonable. Furthermore, a proposed alternative is reasonable only if it will achieve the objectives of the Federal action. While 40 CFR 1502.14(a) requires that an agency look at reasonable alternatives, 49 U.S.C. 47106(c)(1)(B) requires an analysis of possible and prudent alternatives for a new runway when significant impacts will occur.

As part of scoping and the overall EIS process, the FAA and its Third Party Contractor (TPC) evaluated the purpose and need and proposed alternatives. This process was influenced by public involvement and input. Based on the FAA defined purpose and need, an analysis of reasonable alternatives was accomplished which incorporated a two-tier alternatives screening process. First, each alternative was considered relative to its ability to meet the stated needs of the proposed action. Those that met the stated needs were automatically carried forward into the secondary screening.

In secondary screening, alternatives potentially meeting the stated needs were then evaluated with respect to consideration of feasibility and prudence as defined in FAA Order 5050.4A (Paragraph 83b), which cites section 509(b)(5) of the 1982 Airport Act and Section 4(f) of the DOT Act<sup>4</sup> as follows.

[These acts] require a finding that “no feasible and prudent alternative” exists. The terms “feasible” and “prudent” are separate criteria and refer to sound engineering principles and sound judgment, respectively. A construction alternative, for example, may be feasible if, as a matter of sound engineering principles, it can be built. It may not be prudent, however, because of safety, policy, environmental, social, or economic consequences. The environmental documentation must show that no feasible and prudent alternative exists when all factors (safety, national policy, efficiency, economic, social, and environmental) are considered.<sup>5</sup>

In an effort to provide further clarity beyond that provided in the Draft EIS, the following describes how the FAA has applied the several criteria the FAA used in conducting secondary screening for this particular airport improvement proposal.

- Pursuant to NEPA, the FAA must take a “hard look” at all “reasonable” alternatives, which as noted earlier, involves a study of those alternatives “that are practical or feasible from the technical and economic standpoint and using common sense.”
- Because the proposed action involves the application for a permit from the U.S. Army Corps of Engineers to fill waters of the U.S., issuance of the 401 Water Quality Certification from the Illinois EPA, and required FAA findings regarding wetlands and floodplains, the FAA must also comply with the alternative analysis of the Clean Water Act, requiring a finding that no practical alternative exists that would avoid or further minimize impacts to the resources at issue.
- Further, as discussed in this Appendix, the proposed action implicates Section 4(f) of Department of Transportation Act and Section 6(f) of the Land and Water Conservation Act because there is proposed use of properties protected by those statutes.

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<sup>4</sup> Section 4(f) of the DOT Act was recodified and renumbered as Section 303 (c) of 49 U.S.C. However, FAA Order 1050.1E continues to refer to section 4(f) as the policies engendered by this section are widely referred to as “Section 4(f)” matters (page A-19).

<sup>5</sup> FAA Order 5050.4A, Airport Environmental Handbook, Paragraph 83b, October 8, 1985.

- As a result, the FAA must comply with FAA Order 5050.4A and conduct alternatives analyses as required by those statutes.

The Council on Environmental Quality (CEQ) suggests, and the FAA's environmental regulations require the EIS to serve as the platform for satisfying not only NEPA, but all these other environmental statutes as well. Because the concepts of reasonableness, practicability, feasibility, and prudence are so related, it would make little sense to conduct separate sets of analyses for these retained alternatives under each of the statutes identified above. Therefore, the FAA has integrated into the secondary screening a common-sense understanding of these similar concepts.

In the EIS, a full range of reasonable alternatives, both on and off the airport were carefully examined. Alternatives considered ranged from the No Action Alternative to use of other modes of travel, use of other airports, congestion management, to detailed planning of specific runway and terminal development options at O'Hare (referred to as Build Alternatives). A description of the alternatives retained for detailed consideration is included in **Section 3.4** of the EIS. These included Build Alternatives C, D, and G, as well as the No Action (Alternative A). **Exhibit L-2**, **Exhibit L-3**, and **Exhibit L-4** depict the conceptual layouts of Build Alternatives C, D, and G, respectively. **Chapter 3, Alternatives**, of the EIS, herein incorporated by reference in this Evaluation, presents the complete analysis of alternatives.

In the course of reviewing comments on the Draft EIS, FAA was presented with suggestions and requests regarding the alternatives presented in the Draft EIS that could be considered for the purpose of avoiding or mitigating some of the impacts associated with proposed Build Alternatives. Although in many cases these suggestions or requests have been described by commenters as "new alternatives", FAA has reviewed these proposals and believes that they are properly characterized as "variants" or "derivatives" to the alternatives that were presented in the Draft EIS. An evaluation of these derivatives is included in **Section 3.6, Evaluation of Derivatives**, of **Chapter 3**, herein incorporated by reference in this Evaluation.

In the **Chapter 3** of the Final EIS, the FAA has identified a Preferred Alternative. In consideration of the substantial similarity between the environmental impacts for Build Alternatives C, D, and G, the FAA has identified the alternative that best fulfills its statutory mission and responsibilities as the "Preferred Alternative." Given the clear superiority of Alternative C in terms of the average annual delay reduction, the FAA has identified Alternative C, the Sponsor's proposed O'Hare Modernization Program, as the Preferred Alternative.



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#### L.1.4 Analysis Subsequent to the Draft EIS

This Section 4(f) and 6(f) Evaluation was prepared following the publication of the Draft EIS and the public hearings that were conducted in late February 2005. Since that time, additional information and decisions relative to the Section 4(f) and 6(f) issues have been identified and applied in this Evaluation. This additional information includes:

- Further consideration of locally important historic sites (sites that are not on or eligible for listing on the National Register of Historic Places (NRHP)).
- Since the completion of the Draft EIS, formal Determinations of Eligibility (DOEs) were completed for potential historic sites within the proposed O'Hare Modernization land acquisition areas. These DOEs were forwarded to the Illinois State Historic Protection Officer (SHPO) for determination of eligibility to the NRHP. One resource, the Geodesic Dome, was previously noted as a potential NRHP resource. However, upon completion of the DOE for this site, the FAA has recommended that this site is not eligible for listing in the NRHP. However, this site will be considered in this Section 4(f) Evaluation as a locally important historic resource.
- The DOE for the St. Johannes Cemetery was submitted to the IHPA for review on March 31, 2005. The FAA recommended this Cemetery eligible for listing in the NRHP. However, the IHPA did not concur with this recommendation.<sup>6</sup> As a result, coordination with the Keeper of the NRHP resulted in a determination that the cemetery is eligible for the NRHP.<sup>7</sup> On June 14, 2005, the IHPA submitted a letter to the Keeper of the NRHP stating that they would be filing a request for reconsideration of the eligibility determination in ten days.<sup>8</sup> IHPA submitted materials in support of the request for reconsideration to the Keeper of the NRHP on June 24, 2005.<sup>9</sup> FAA reviewed the materials submitted by IHPA to the Keeper of the NRHP and submitted materials in support of FAA's original recommendation of eligibility on July 7, 2005.<sup>10</sup> A response on the final determination of eligibility is due from the Keeper of the NRHP in July 2005. However, irrespective of the final determination on eligibility, for purposes of this EIS, FAA is treating St. Johannes Cemetery as a locally important historic property.
- The Rest Haven Cemetery DOE was submitted to the IHPA for review on May 25, 2005. On June 24, 2005, IHPA requested bibliography materials in support of FAA's DOE.<sup>11</sup> FAA submitted the bibliography materials to IHPA on June 27, 2005.<sup>12</sup> A response on the IHPA's determination of eligibility is due in July 2005. However, irrespective of the determination on eligibility, for purposes of this EIS, FAA is treating Rest Haven Cemetery as a locally important historic property.

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<sup>6</sup> Letter from IHPA to FAA regarding St. Johannes Cemetery, April 29, 2005.

<sup>7</sup> Letter from Keeper of the NRHP to the FAA, June 9, 2005.

<sup>8</sup> Letter from IHPA to Keeper of the NRHP, June 14, 2005.

<sup>9</sup> Letter from IHPA to Keeper of the NRHP, June 24, 2005.

<sup>10</sup> Letter from FAA to Keeper of the NRHP, July 7, 2005.

<sup>11</sup> Letter from IHPA to FAA, June 24, 2005.

<sup>12</sup> Letter from FAA to IHPA, June 27, 2005.

- Green Street School was identified as eligible for listing on the NRHP. The Green Street School was originally proposed for acquisition and demolition under Build Alternative C. Subsequent to the preparation of the Draft EIS, as a part of this Section 4(f) Evaluation and during the development of this Final EIS, FAA identified that a minor modification to the Green Street School chimney would obviate the need to acquire the property. FAA technical experts identified that a chimney on this structure would penetrate the Terminal Instrument Procedures (TERPS) Surfaces of proposed Runway 10R/28L. If Build Alternative C were selected, the City of Chicago may need to obtain an avigation easement to lower the height of the chimney by 9.1 feet. This would avoid acquisition of the property. The FAA has determined that the lowering of this chimney could be done in accordance with Secretary of Interior's *Standards for the Treatment of Historic Buildings* (U.S. Department of Interior, National Park Service, 1995). Therefore, the effect to this structure would not cause a substantial impairment to this historic property. See **Attachment L-2**, which contains a copy of FAA's May 13, 2005 letter to the City of Chicago concerning the Green Street School.
- The Draft EIS originally identified a potential constructive use of the Norwood Park Community Center. Upon further review, this community center conducts active recreation activities, and thus is compatible with higher noise levels than were originally identified. See **Attachment L-3** - FAA Land Use Compatibility Guidelines. As a result, FAA concludes that no impacts to this Section 4(f) resource are anticipated. Therefore, no additional analysis of this resource is necessary.
- As discussed in EIS **Section 5.12 Wetlands**, wetland impacts would occur with any of the Build Alternatives. No practical alternative exists that would avoid or further minimize impacts to the wetlands at O'Hare. Mitigation for filling wetlands and non-wetland Waters of the U.S., located on the DuPage County portion of the O'Hare Airport property, may occur within the West Branch Forest Preserve, which is part of the DuPage County Forest Preserve District. West Branch Forest Preserve, located in Bartlett, Illinois, was purchased by the District for flood control during the 1970s. The preserve contains a reservoir that holds storm water and helps prevent flooding in the surrounding communities. The proposed wetland mitigation program growing out of the O'Hare Modernization planned for the West Branch Forest Preserve at this site includes restoration of areas that were at one time classified as wetlands and potential enhancement to wetlands already present in the forest preserve system. FAA has determined that this wetland enhancement not a use under Section 4(f). Instead, this mitigation effort further meets the intent of Section 4(f) by preserving some of the original conditions at the West Branch site. Substantial coordination with the DuPage County Forest Preserve District has taken place to discuss the specific mitigation measures. On May 11, 2005, the FAA sent a letter to the DuPage Forest Preserve District outlining the coordination that has taken place and identifying the understandings that have been reached regarding the West Branch wetlands mitigation site. The DuPage County Forest Preserve District sent a letter to FAA on May 16, 2005 confirming the information that is in the FAA's May 11, 2005 letter. See **Attachment L-2** for a copy of this correspondence. No constructive use or substantial impairment to this property is anticipated. As a

- result, no further analysis of the West Branch Forest Preserve is necessary as it relates to this Section 4(f) Evaluation.
- Within the EIS, interim noise levels (by Construction Phase) were presented for disclosure purposes. The FAA has determined that the short-term/temporary aircraft noise levels experienced before completion of any of the Build Alternatives (C, D, and G), if selected, would not result in any changes in the current uses of Section 4(f) resources in the vicinity of O'Hare. As a result, this Section 4(f) Evaluation discusses the Build Out + 5 noise impacts.
  - As a result of information received through the public comment and mitigation coordination process on the Draft EIS, the FAA became aware of additional concerns related to Section 4(f) resources in the project area. The FAA initiated further contact with the Village of Bensenville, and Elk Grove Village. In addition to phone contacts, on March 7, 2005, March 28, 2005, and again on April 13, 2005, FAA sent letters to the Village of Bensenville and/or Elk Grove Village requesting input to aid in FAA's Section 4(f) evaluation of resources. On April 27, 2005, information was submitted to FAA concerning the Elk Grove Village system of "Pocket Parks". Additionally, on May 6, 2005, two separate documents were submitted to the FAA by representatives of St. John's United Church of Christ, Rest Haven Cemetery Association, the Village of Bensenville and Elk Grove Village. FAA has considered this correspondence in this Evaluation. In addition, FAA has included the submittals in **Attachment L-2** to ensure full disclosure of the issues raised. With the exception of two properties, the information pertaining to the "Pocket Parks" and the additional submitted parks and local sites of historic importance were included in this Section 4(f) Evaluation. Two properties, Godiva Park and Busse Farm, were unable to be located based on the information submitted. Subsequent phone calls were made to the Elk Grove Park District (noted as the owner of Godiva Park) and internet searches yielded no specific information regarding the locations of these two resources. No further clarification was provided in relation to the location/existence of these parks by any commenters on the Draft 4(f) and 6(f) Evaluation.
  - As a result of the specific correspondence identified in the previous bullet, and in an effort to avoid and minimize potential impacts, the City of Chicago may chose not to acquire the Lake LGK Property within Elk Grove Village if a Build Alternative is approved in the FAA's issuance of a Record of Decision, and the City of Chicago decides to proceed with the O'Hare Modernization. The FAA sent a letter on May 13, 2005 that specifically addresses the Lake LGK Property within Elk Grove Village. A copy of the FAA's letter, contained in **Attachment L-2**, sets forth certain conditions under which City of Chicago could consider not acquiring this property. One other option may be for the City of Chicago to acquire the Lake LGK Property but maintain it as a "Pocket Park".
  - The FAA has performed an air quality analysis of particulate matter 2.5 microns or less in size emissions, including dispersion in coordination with IEPA. The results of the full analyses of particulate matter 2.5 microns or less in size are included in **Section 5.6** of the Final EIS. Further analysis of particulate matter 2.5 microns or less in size at selected sites (including parks, locally important historic sites, pocket

parks, and historic sites) has also been accomplished and is included in this Final Section 4(f) Evaluation in **Section L.2.1.2**. The results of the analysis indicated that there would be no exceedances of the NAAQS, with or without the proposed O'Hare Modernization for this pollutant. The NAAQS takes into consideration impacts on children and the elderly as among the most sensitive portions of the population.

- The FAA has selected Alternative C, the Sponsor's proposed O'Hare Modernization Program, as the Preferred Alternative. The FAA did not identify a preferred alternative in the Draft EIS, believing that this decision could best be made after consideration of all comments and subsequent analysis that post-dated the Draft EIS. **Section D** of the **Executive Summary** identifies the extensive outreach conducted by the FAA to maximize public involvement in the Agency's evaluation of O'Hare modernization. Further, the Agency's careful scrutiny of the comments received on the Draft EIS, and the responses crafted to those comments (see **Appendix U**) provided additional insight into the identification of the preferred alternative.
- Subsequent to the Draft EIS, FAA was presented with suggestions and requests regarding the alternatives presented in the Draft EIS that could be considered for the purpose of avoiding or mitigating some of the impacts associated with proposed Build Alternatives. Although in many cases these suggestions or requests have been described by commenters as "new alternatives", FAA has reviewed these proposals and believes that they are properly characterized as "variants" or "derivatives" to the alternatives that were presented in the Draft EIS. An evaluation of these derivatives is included in **Section 3.6, Evaluation of Derivatives**, of **Chapter 3**, herein incorporated by reference in this Evaluation.

### **L.1.5 Comparison of Impacts**

The EIS found that the three Build Alternatives (Alternatives C, D, and G) would directly impact Section 4(f) and Section 6(f) lands as shown on **Table L-1**. As this table shows, all of these Build Alternatives would result in a direct impact, through acquisition, to the same seven Section 4(f) lands, including three parklands and four historic properties. Impacts to Schuster Park, a Section 4(f) and Section 6(f) property, would not be avoided, as all three Build Alternatives would result in taking this park (P-8).

**TABLE L-1  
SUMMARY OF DIRECT IMPACTS ON SECTION 4(f) AND SECTION 6(f) LANDS**

	Alternative C	Alternative D	Alternative G
<b>Direct Impact (Acquisition/Displacement)</b>			
Silver Creek - DuPage County Forest Preserve	Yes	Yes	Yes
P-8 Schuster Park (Bensenville containing a playground and sports fields) Section 6(f) property	Yes	Yes	Yes
P-1 Bretman Park (Bensenville containing a playground and sports fields)	Yes	Yes	Yes
HP-5 Gas Service Station (Bensenville)	Yes	Yes	Yes
HP-6 Rest Haven Cemetery *	Yes	Yes	Yes
HP-7 St. Johannes Cemetery*	Yes	Yes	Yes
HP-10 Schwerdtfeger Farmstead*	Yes	Yes	Yes
Source: TPC Analysis			
*Sites pending determination of eligibility.			

Alternative A (No Action) does not meet the purpose and need as concluded in the EIS, and is not a reasonable alternative to the proposed action under NEPA. However, under Section 4(f), the FAA must evaluate “prudent and feasible alternative[s] to using that land.” FAA concludes that Alternative A is imprudent because it does not meet the purpose and need of the proposed project.

As previously mentioned, subsequent to the Draft EIS, FAA was presented with suggestions and requests regarding the alternatives presented in the Draft EIS that could be considered for the purpose of avoiding or mitigating some of the impacts associated with proposed Build Alternatives. These suggested alternatives were provided to the FAA on May 6, 2005 for consideration. **Section 3.6** of the Final EIS evaluates the commenter developed derivatives in relation to the FAA’s screening criteria utilized in the EIS. FAA representatives evaluated these eight derivatives relative to the purpose and need. Based on its evaluation, FAA has determined that none of the commenter derivatives meet purpose and need. Therefore, these derivatives were not retained for secondary screening.

As a result of comments made on the Draft EIS, the Agency directed its staff to develop derivatives of Alternative C that would avoid or minimize potential impacts to the cemeteries (St. Johannes and Rest Haven). FAA representatives from within the Great Lakes Region (Airports, Air Traffic, CAMPO, TPC, and Runway Safety Officer) evaluated the FAA developed five derivatives in comparison to Alternative C. Based on its evaluation, FAA determined that none of the five FAA derivatives was a less restrictive alternative capable of performing as well as Alternative C. Similarly, none of the five derivatives would avoid or minimize impacts to the cemeteries while also performing as well as Alternative C.

## **L.2 DETERMINATION OF SECTION 4(f) APPLICABILITY**

To determine the applicability of Section 4(f) lands within the EIS study area, a comprehensive inventory and evaluation of several factors pertinent to the parks, locally important historic sites, and historic properties was conducted and evaluated with regard to the proposed action. **Tables L-2** and **L-6** present an updated list of the 117 parks/recreational resources and 134 locally important historic sites in the Airport vicinity, respectively. **Table L-2** also lists the 13

sites that are on or potentially eligible for the National Register of Historic Places. These include the new parks and locally important historic sites identified in the supplemental information submitted on April 29, 2005 and May 6, 2005. **Exhibits L-5 through L-13** depict the locations of these resources relative to the proposed alternatives.

Airport development can impact or "use" Section 4(f) lands either directly or indirectly. The approaches to identifying the potential direct and indirect impacts are described as follows.

### L.2.1 Criteria/Methodology for Determination of Impacts

Each Section 4(f) and 6(f) land was evaluated for potential direct and indirect impacts associated with the implementation of Build Alternatives C, D, and G. The potential impact criteria evaluated for each site included direct impacts (land acquisition) and indirect impacts (changes in access, visual impacts, air pollution, water pollution, and noise), both of which could "use" the lands under Section 4(f). Both direct impacts and indirect impacts (constructive use) are further defined in the following paragraphs.

#### L.2.1.1 Direct Impacts

Direct impacts or "use" refers to direct physical impacts to park resources, such as a physical taking or acquisition of Section 4(f) land for incorporation into a proposed project. For example, acquiring and developing a portion of a park to build a transportation improvement would be considered a "use". Consequently, the use of the property would be changed from park and recreation use to some other use. For the purposes of this evaluation, each park/recreational resource and historic site was evaluated to identify those lands that would be directly impacted by the proposed action.

In determining direct impacts, each resource was evaluated for its proximity to the proposed Build Alternatives to determine whether or not property acquisition would be required. If the resource would be located within the area of proposed acquisition for each Build Alternative, it would be directly impacted. Aerial photography and Geographic Information System (GIS) base mapping combined with preliminary plan and profile sheets for the proposed improvements were used in the analysis to determine the extent of land acquisition and the potential impacts. The acquisition areas associated with each of the Build Alternatives are shown in **Exhibit L-14**.

**TABLE L-2  
SECTION 4(f) AND SECTION 6(f) LANDS**

Map ID	Name	Location
FP-1	Elk Grove Forest Preserve (Salt Creek West)	Elk Grove Village
FP-2	Elk Grove Forest Preserve (Salt Creek East)	Elk Grove Village
FP-3	Silver Creek (DuPage County Forest Preserve)	Bensenville
FP-4	Ned Brown Forest Preserve	Elk Grove Village
P-1	Bretman Park	Bensenville
P-2	DiOrio Park	Bensenville
P-3	Kremples Park	Bensenville
P-4	Lions Park	Bensenville
P-5	Pines Park	Bensenville
P-6	Poplar Park	Bensenville

**TABLE L-2**  
**SECTION 4(f) AND SECTION 6(f) LANDS**

<b>Map ID</b>	<b>Name</b>	<b>Location</b>
P-7	Rose Park	Bensenville
P-8	Schuster Park (6(f) Property)	Bensenville
P-9	Sunrise Park	Bensenville
P-10	Sunset Park	Bensenville
P-11	Varble Park/Water Park & Golf Waters Grove	Bensenville
P-12	Locomotive Museum at Veteran's Park	Bensenville
P-13	Woodcrest Park	Bensenville
P-14	Woodside Park	Bensenville
P-15	Grandparents Park	Chicago
P-16	Mulberry Point Park	Chicago
P-17	Myrtle Point Park	Chicago
P-18	Norwood Circle Park	Chicago
P-19	Norwood Park	Chicago
P-20	Oriole Park	Chicago
P-21	Summerdale Park	Chicago
P-27	Seminole Park	Des Plaines
P-29	Salt Creek Park	DuPage County
P-30	Andrews Park	Elk Grove Village
P-31	Appleseed Park	Elk Grove Village
P-32	Community Athletic Fields	Itasca
P-33	Audubon Park	Elk Grove Village
P-34	Bartrum Park	Elk Grove Village
P-35	Burbank Park	Elk Grove Village
P-36	Fairchild Park	Elk Grove Village
P-37	Lions Park (Rainbow Falls)	Elk Grove Village
P-38	Muir Park	Elk Grove Village
P-39	Olmstead Park	Elk Grove Village
P-40	Osborn Park	Elk Grove Village
P-41	Sanders Park	Elk Grove Village
P-42	Udall Park	Elk Grove Village
P-54	Benson Park	Itasca
P-56	Country Club Park	Itasca
P-57	Franzen Park	Itasca
P-59	Schiller Park	Itasca
P-62	Brickton Park	Park Ridge
P-63	Centennial Park	Park Ridge
P-64	Jaycee Park	Elk Grove Village
P-65	Southwest Park	Park Ridge
P-66	Fairview Park	Schiller Park
P-67	Kennedy Park/ Memorial Pool	Schiller Park
P-68	North Village Park	Schiller Park
P-70	Wm. M. Dooley Memorial Park	Schiller Park
P-72	Central Park	Wood Dale

**TABLE L-2  
SECTION 4(f) AND SECTION 6(f) LANDS**

<b>Map ID</b>	<b>Name</b>	<b>Location</b>
P-73	Wood Dale Community Park	Wood Dale
P-74	Lionwood Park	Wood Dale
P-75	Veteran's Memorial Park	Wood Dale
P-76	White Oak Park	Wood Dale
P-77	Wood Dale Water Park	Wood Dale
PX-25	Brooks Park	Chicago
PX-27	Athletic Fields	Elk Grove Village
PX-29	Gladstone Park	Chicago
PX-32	Indian Road Park	Chicago
PX-34	Monument Park	Chicago
PX-39	Olympia Park	Chicago
PX-41	Pleasant Point Park	Chicago
PX-43	Rosedale Park	Chicago
PX-73	Addison Community Park East	DuPage County
PX-79	Burbank Park	Elk Grove Village
PX-88	Jay Cee Park	Elk Grove Village
PX-97	Morton Park	Elk Grove Village
PX-103	Roosevelt Park	Elk Grove Village
PX-167	Cumberland Prairie Park	Park Ridge
PX-168	Hinckley Park	Park Ridge
PX-192	South Park	Park Ridge
PX-193	Terrace Park	Bensenville
PX-194	Redmond Park	Bensenville
PX-195	Veteran's Park West - Bensenville City Park	Bensenville
PX-196	Bensenville Library Garden of Knowledge	Bensenville
PX-197	Library District Park	Bensenville
PX-198	Palm-Breiter Park	Bensenville
PX-199	Veterans Memorial Park	Elk Grove Village
PX-200	Hanson Park	Elk Grove Village
PX-201	Village Green	Elk Grove Village
PX-202	Elk Grove Park District (Salt Creek Placid Ave)	Elk Grove Village
PX-203	Debra Park	Elk Grove Village
PX-204	Johnson Park	Elk Grove Village
PX-205	Majewski Metro Park in Des Plaines	Mount Prospect
PX-206	MWRD Preservation Area	Unincorporated Cook Count
PX-207	Salt Creek Golf Club	Wood Dale
PX-208	SBL Park	Elk Grove Village
PX-209	Marshall Field	Elk Grove Village
PX-210	Salt Creek Field	Elk Grove Village
PX-211	Woodland Meadows	Elk Grove Village
PX-212	Huntington Park (Chase)	Elk Grove Village
PX-213	Ridge Park (Field)	Elk Grove Village
PX-214	Hattendorf Park (Al Hattendorf Center)	Elk Grove Village
PX-215	Legend's Golf Course	Bensenville
PX-216	Godiva Park	Location Undetermined

**TABLE L-2  
SECTION 4(f) AND SECTION 6(f) LANDS**

<b>Map ID</b>	<b>Name</b>	<b>Location</b>
PX-217	Busse Farm	Location Undetermined
PP-1	LGK Pocket Park (Under Construction)	Elk Grove Village
PP-2	Pocket Park #2 (Under Construction)	Elk Grove Village
PP-3	Pocket Park #3 (Construction)	Elk Grove Village
PP-4	Pocket Park 4 (Construction)	Elk Grove Village
PP-5	Pocket Park #5 (Construction)	Elk Grove Village
PP-6	Pocket Park #6 (Future)	Elk Grove Village
PP-7	Pocket Park #7 (Construction)	Elk Grove Village
PP-8	Pocket Park #8 (Future)	Elk Grove Village
PP-9	Pocket Park #9 (Existing)	Elk Grove Village
PP-10	Pocket Park #10 (Future)	Elk Grove Village
PP-11	Pocket Park #11 (Future)	Elk Grove Village
PP-12	Pocket Park #12 (Existing)	Elk Grove Village
PP-13	Pocket Park #13 (Future)	Elk Grove Village
PP-14	Pocket Park #14 (Future)	Elk Grove Village
PP-15	Pocket Park #15 (Existing)	Elk Grove Village
PP-16	Pocket Park #16 (Future)	Elk Grove Village
PP-17	Pocket Park #17 (Future)	Elk Grove Village
PP-18	Pocket Park #18 (Existing)	Elk Grove Village
PP-19	Pocket Park #19 (Future)	Elk Grove Village
PP-20	Pocket Park #20 (Future)	Elk Grove Village

**SITES ON OR POTENTIALLY ELIGIBLE FOR THE NATIONAL REGISTER OF HISTORIC SITES**

<b>Map ID</b>	<b>Name</b>	<b>Location</b>
HP-1 (b)	Churchville School	Bensenville
HP-2 (b)	Norwood Park Historical District (788 Contributing/53 Non-Contributing Bldgs.)	Chicago
HP-3 (b)	Noble-Seymour-Crippen House	Chicago
HP-4	Green Street School	Bensenville
HP-5	Gas Service Station	Bensenville
HP-6 (a)	Rest Haven Cemetery	Chicago
HP-7 (a)	St. Johannes/John's Cemetery	Chicago
HP-8 (a)	United Terminal 1 and CTA Transfer Station, Helmut Jahn	On airport/Chicago
HP-9 (a)	Old Control Tower, I.M. Pei	On airport/Chicago
HP-10 (a)	Schwerdtfeger Farmstead	On airport/Chicago
HP-11	Wingert House	Chicago
HPN-24 (b)	Old Edgebrook District	Chicago
HPN-4 (b)	Chicago & NW Depot	Chicago

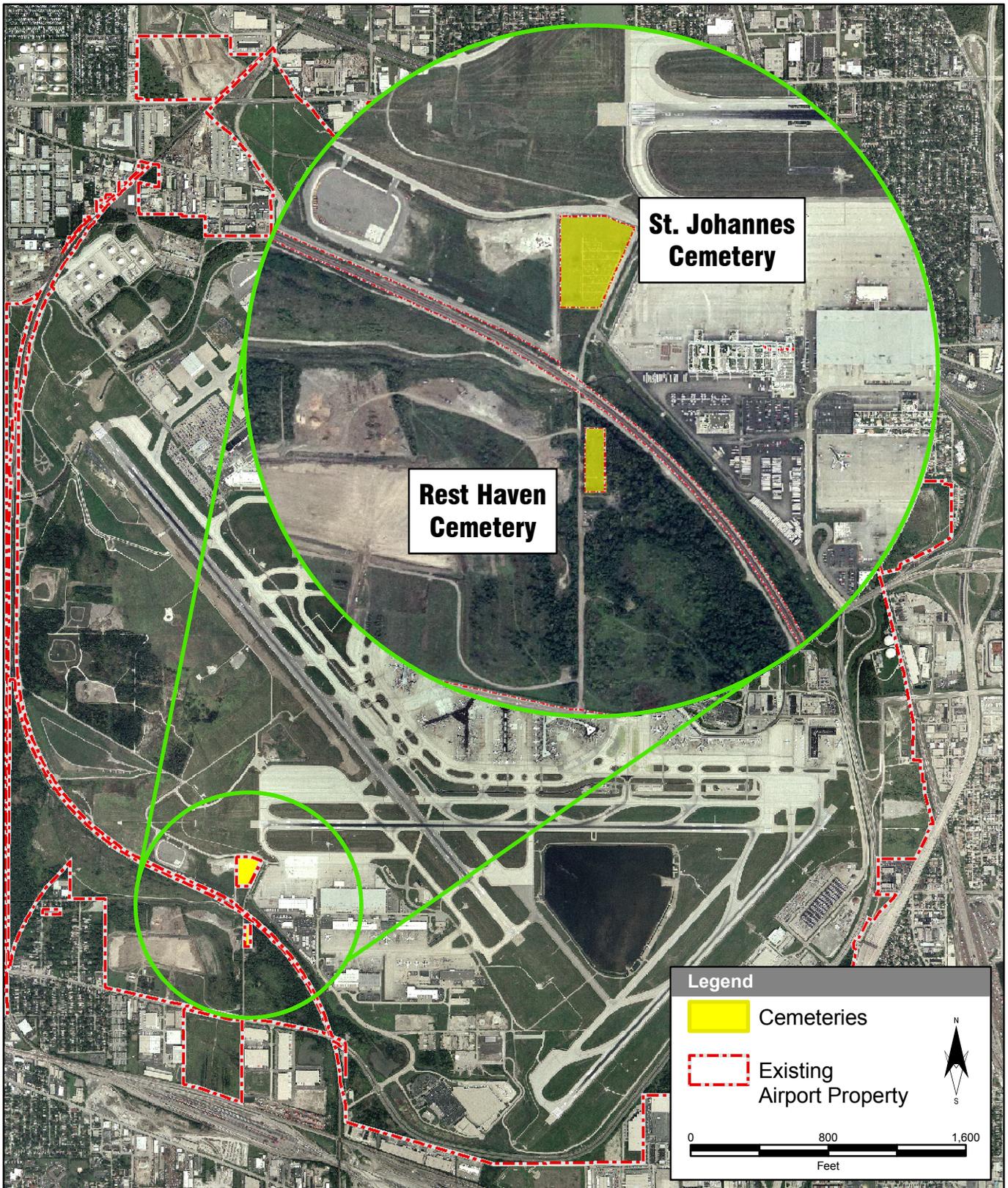
Notes:

- (a) Sites pending determination of eligibility.
- (b) No direct or indirect impact on these Section 4(f) resources.

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Source: Aerial: Aerial Express, September 2002. Cemeteries: City of Chicago Land Acquisition Parcel Database, January 2004.

Chicago O'Hare International Airport

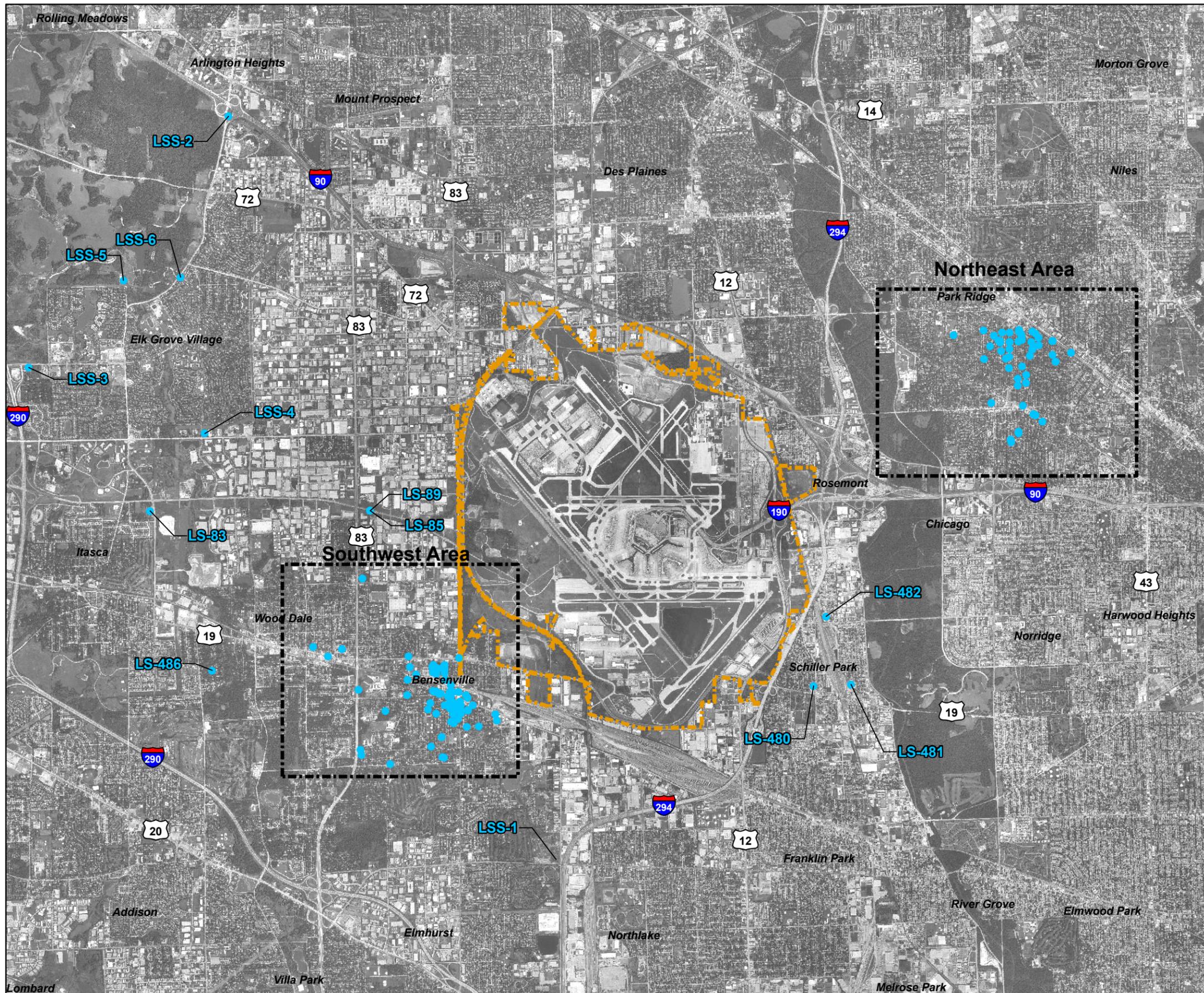
## Cemetery Locations



### O'Hare Modernization Section 4(f) and 6(f) Evaluation

► Exhibit L-6

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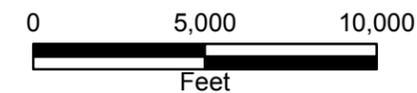
Source: Roads: ESRI, StreetMap, 2003. Local Sites: Archeological Research Inc. 2004



Chicago  
O'Hare  
International  
Airport

**O'Hare Modernization  
Section 4(f) and 6(f) Evaluation**

- Locally Important Historic Sites
- Existing Airport Property



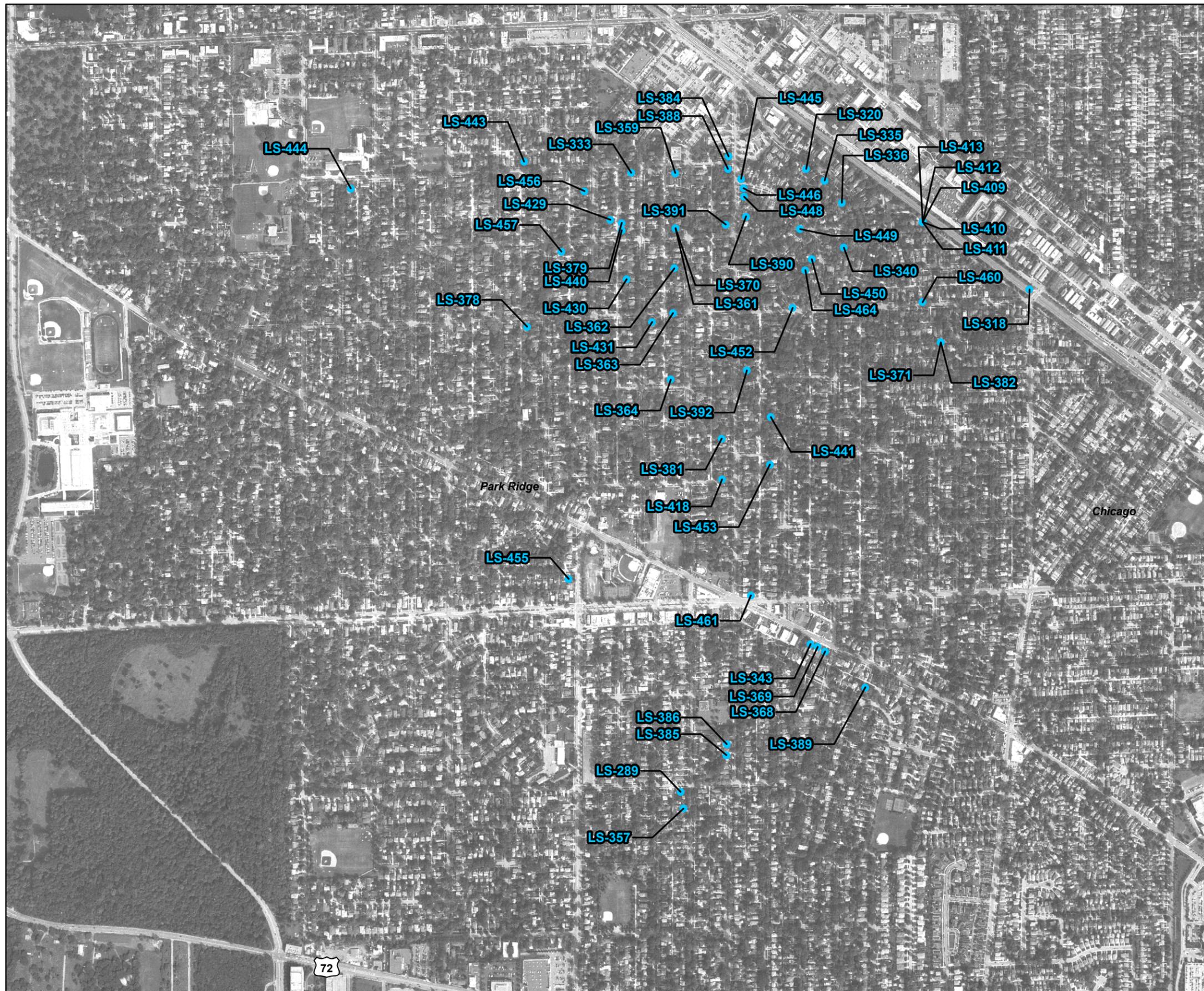
**Locally Important Historic Sites  
in the Vicinity of O'Hare**

► Exhibit L-7

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Chicago

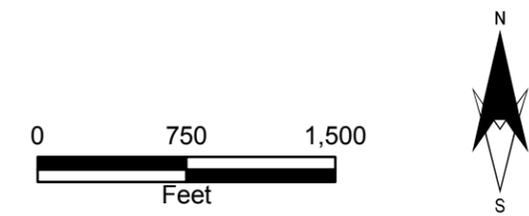
O'Hare

International

Airport

**O'Hare Modernization  
Section 4(f) and 6(f) Evaluation**

● Locally Important Historic Sites

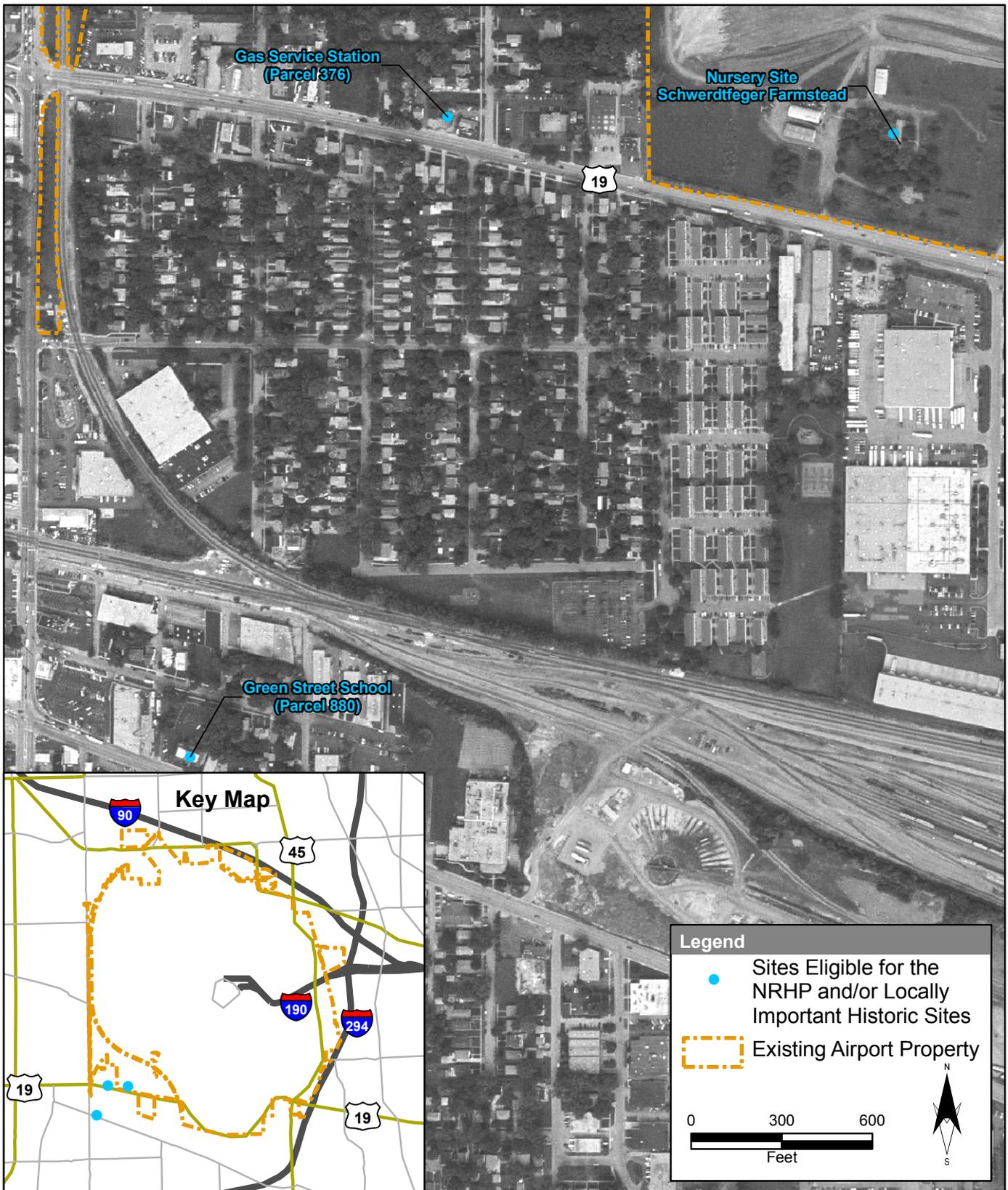


**Locally Important Historic Sites  
Northeast of O'Hare**

► Exhibit L-9

Source: Roads: ESRI, StreetMap, 2003. Local Sites: Archeological Research Inc. 2004

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Source: Archaeological Research Inc. 2004.



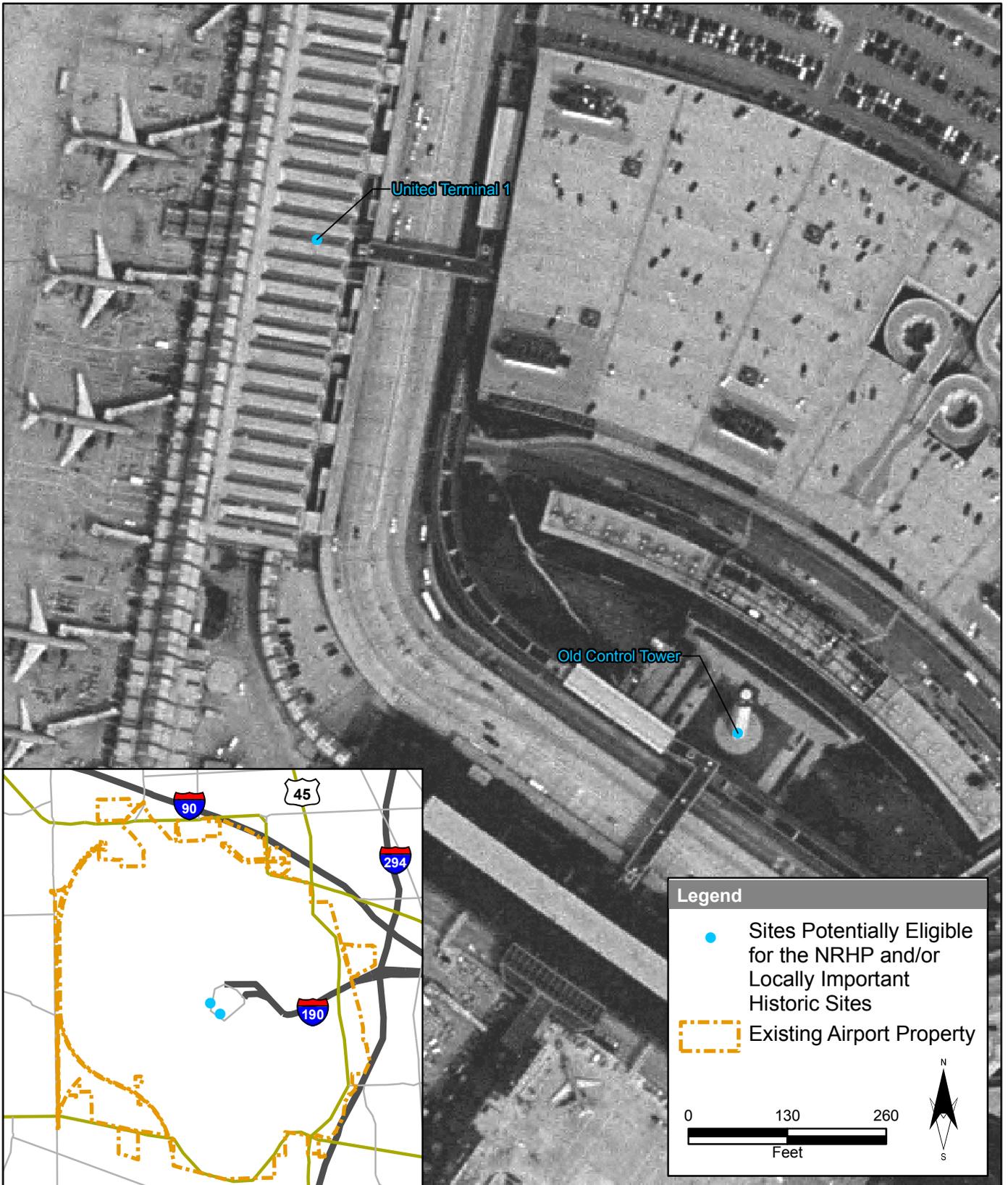
Chicago O'Hare International Airport

**O'Hare Modernization  
Section 4(f) and 6(f) Evaluation**

**Gas Service Station,  
Green St. School,  
& Schwerdtfeger Farmstead**

► Exhibit L-10

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Source: Archaeological Research Inc. 2004.



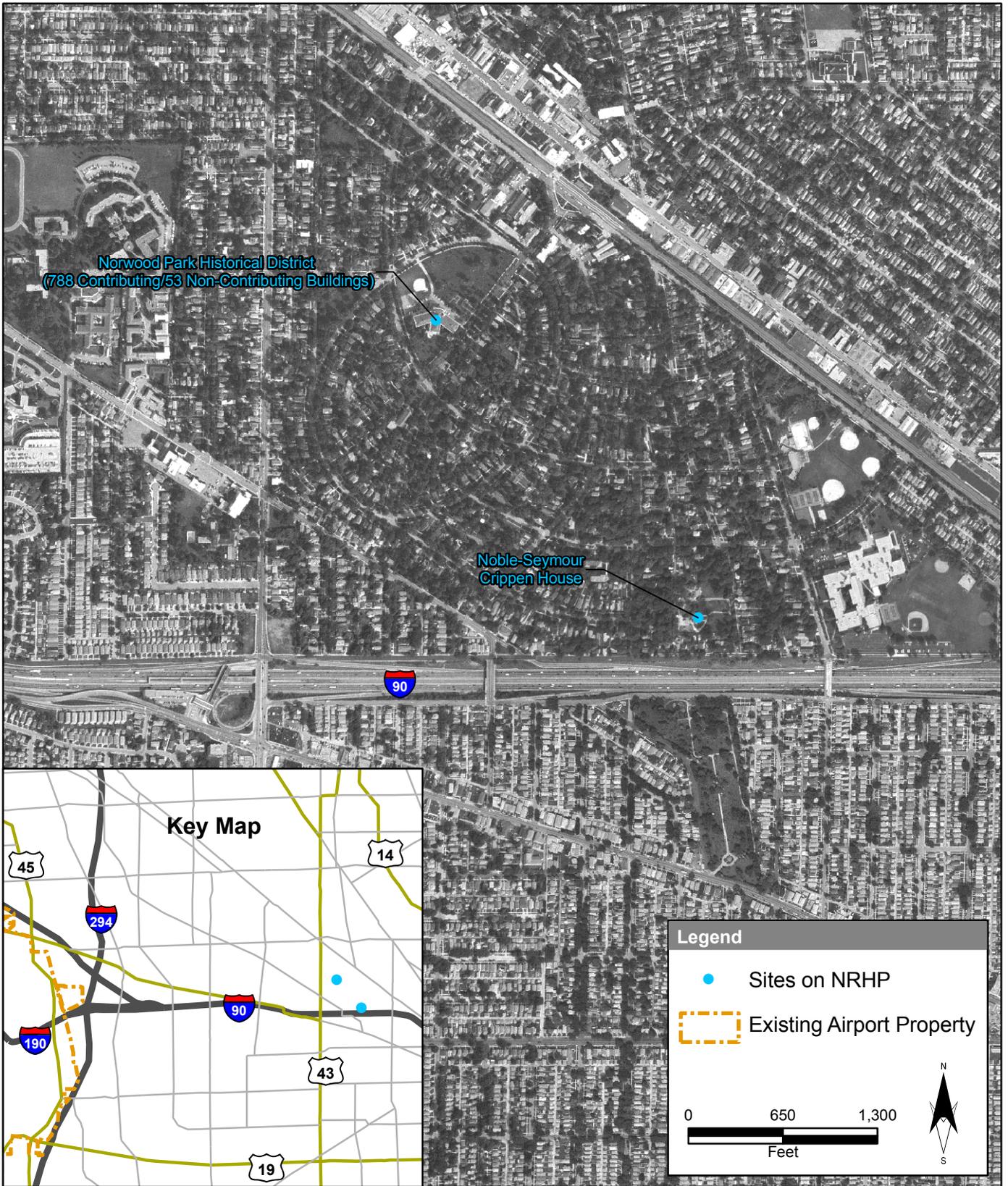
Chicago O'Hare International Airport

**O'Hare Modernization  
Section 4(f) and 6(f) Evaluation**

**United Airlines Terminal 1  
& the Old Control Tower**

► Exhibit L-11

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Source: Archaeological Research Inc. 2004.



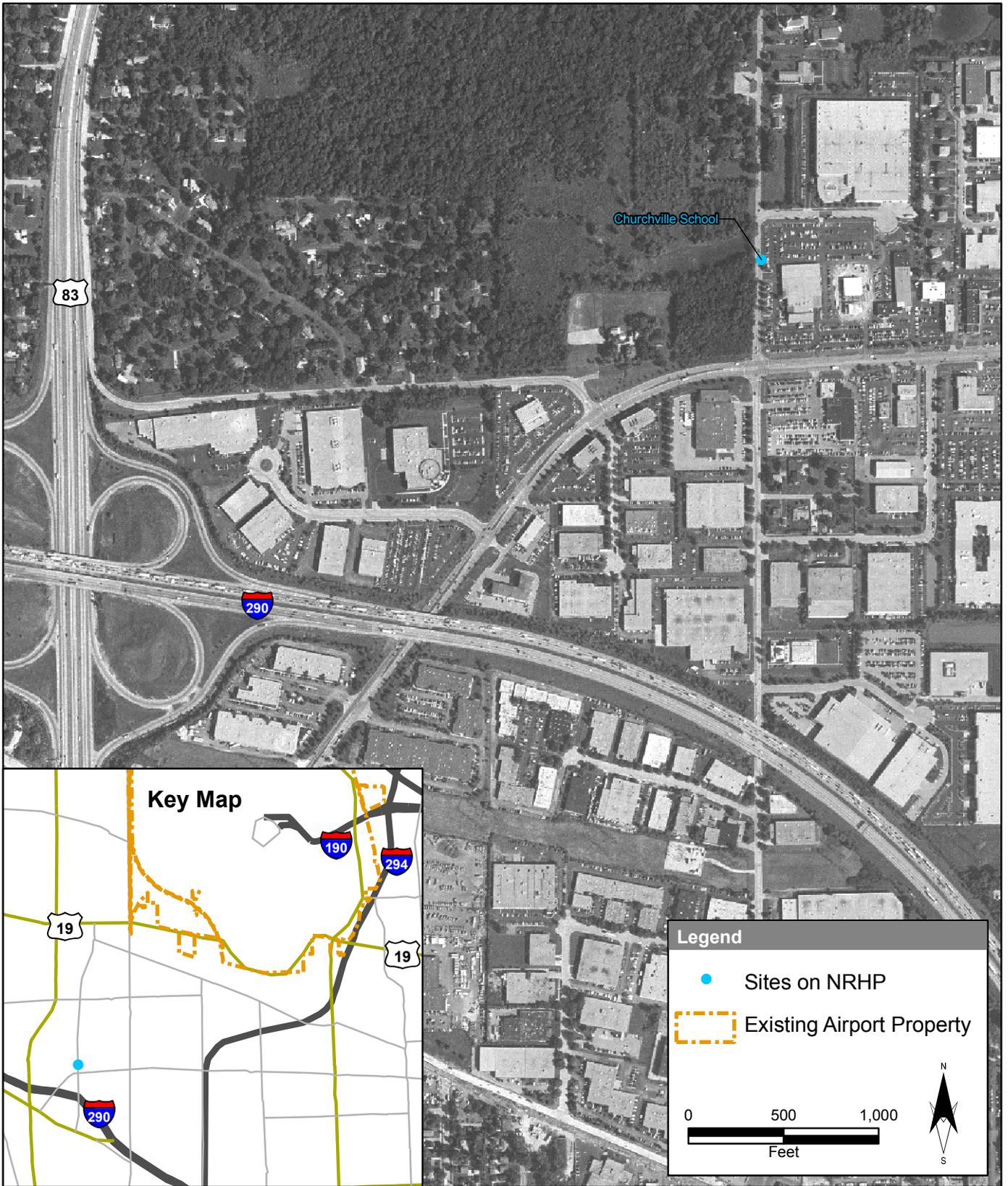
Chicago O'Hare International Airport

**O'Hare Modernization  
Section 4(f) and 6(f) Evaluation**

**Norwood Park Historical District  
& Noble Seymour-Crippen House**

► Exhibit L-12

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Source: Archaeological Research Inc. 2004.



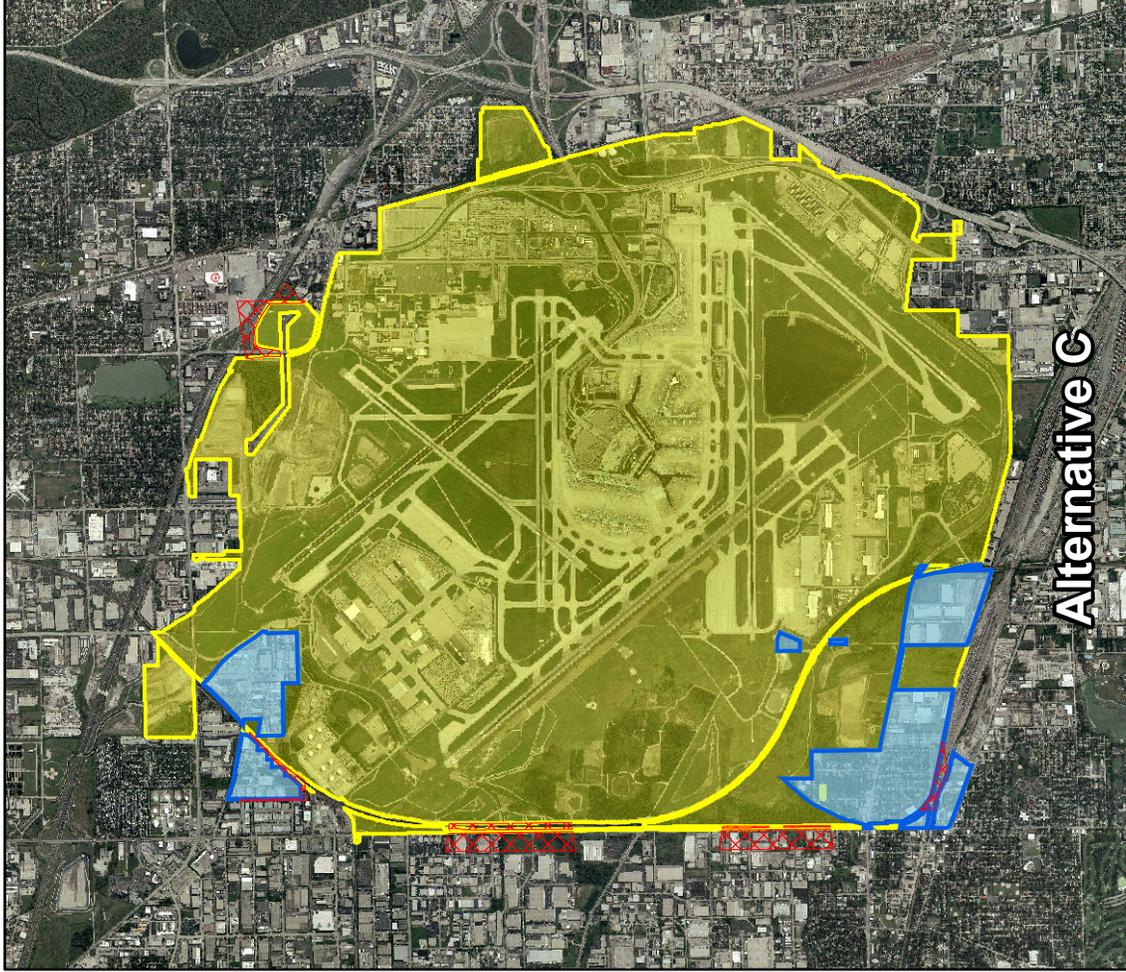
Chicago O'Hare International Airport

**O'Hare Modernization  
Section 4(f) and 6(f) Evaluation**

**Churchville School**

► Exhibit L-13

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Proposed Acquisition Areas

Existing Airport Property

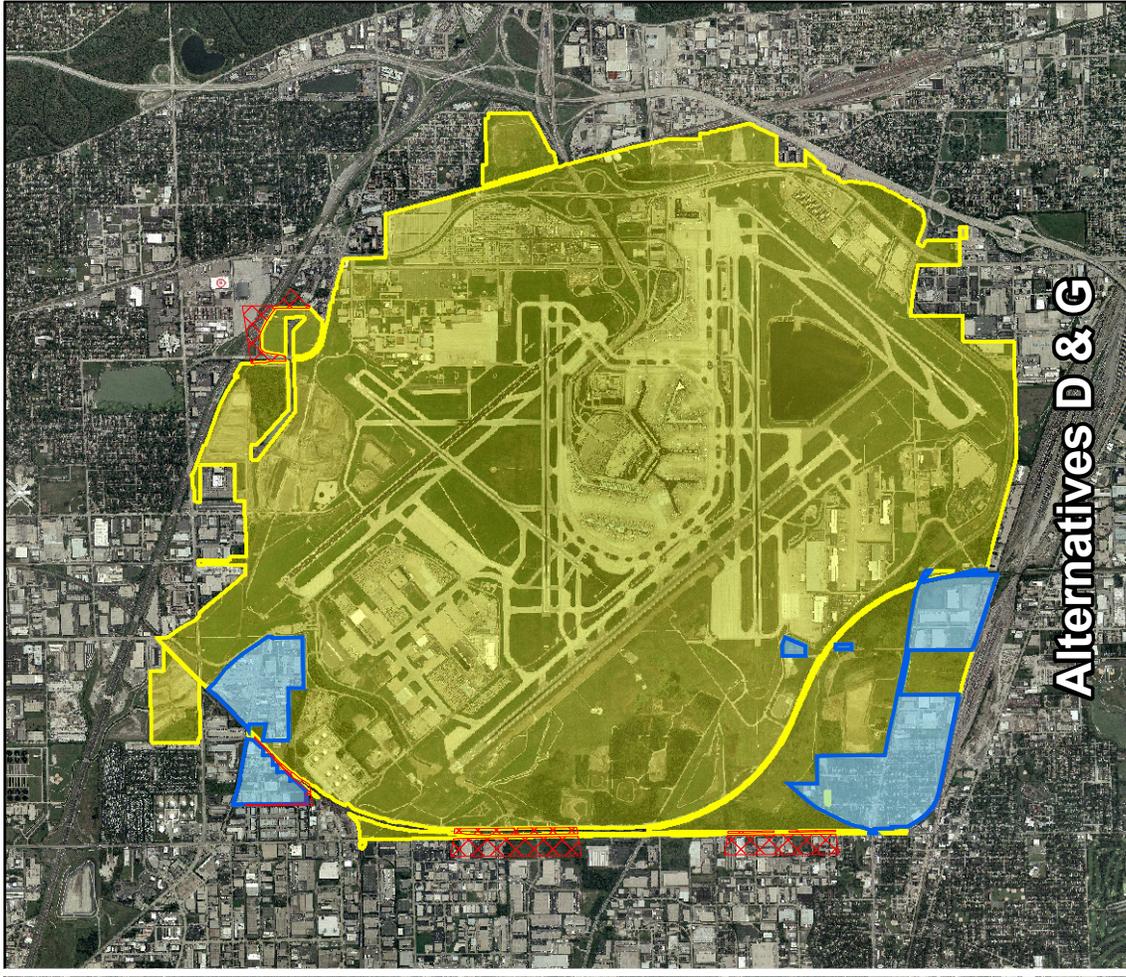
Proposed Avigation Easement

Chicago O'Hare International Airport



**O'Hare Modernization  
Section 4(f) and 6(f) Evaluation**

**Proposed Land Acquisition**



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### L.2.1.2 Indirect Impacts

Several criteria have been identified to determine indirect impacts (constructive use) to the Section 4(f) lands and are described in the following paragraphs.

"Use" within the context of Section 4(f) includes not only actual physical taking of such lands but also indirect impacts as well. Indirect impacts, termed "constructive use", do not incorporate land from a Section 4(f) resource, but due to the proximity impacts of the project, the activities, features, or attributes of the site's vital functions are substantially impaired. Such substantial impairment occurs only when the activities, features, or attributes of the resource that contribute to its significance or enjoyment are substantially diminished. For example, a significant increase in noise levels at a park due to a transportation project may represent a constructive use if the noise impact would substantially impair the values of that park, even though the park property is not directly affected through acquisition or physical development.

The definition of constructive use adopted for this study is based on FAA Order 1050.1E Appendix A, Paragraph 6.2f, which states:

Substantial impairment occurs only when the activities, features, or attributes of the resource that contribute to its significance or enjoyment are substantially diminished. A project which respects a park's territorial integrity may still, by means of noise, air pollution, or otherwise, dissipate its aesthetic value, harm its wildlife, defoliate its vegetation, and take it in every practical sense. For section 4(f) purposes, the impairment must be substantial. With respect to aircraft noise, for example, the noise must be at levels high enough to have negative consequences of a substantial nature that amount to a taking of a park or portion of a park for transportation purposes.

### Noise

Suggested guidelines for evaluating land use compatibility with noise exposure were developed by the Federal government and adopted by FAA (based on 14 CFR Part 150) and are presented in **Attachment L-3**. The FAA's noise compatibility guidelines generally identify three thresholds of noise levels (65, 70, and 75 DNL, with some provisions for higher levels if structures, such as an incompatible use: auditoriums, or museums can be soundproofed) applicable to parks/recreational resources and historic sites, depending on the types of activities that occur at the site. These guidelines were used to determine acceptable noise levels over the Section 4(f) lands identified in this document.

Following accepted FAA guidelines and methodologies, noise contours for each of the Build Alternatives were plotted and compared with the GIS database of Section 4(f) and Section 6(f) locations. Modeled noise levels were compared with FAA land use compatibility guidelines to determine potential impacts. Those resources projected to experience noise levels in excess of FAA criteria were determined to be indirectly impacted by the project. **Table L-7** identifies the applicable land use compatibility noise level for each Section 4(f) resource. Based on the noise contours for each Build Alternative for the Build Out + 5 phase, an analysis of whether or not each resource would be compatible with the projected noise levels was conducted. For those resources where incompatible noise levels are predicted, further analysis was then conducted to determine if there would be a substantial impairment on the resource that would constitute a constructive use.

As noted in FAA guidance, a constructive use noise impact could occur where "the noise [is] at levels high enough to have negative consequences of a substantial nature that amount to a

taking of a park or portion of a park for transportation purposes." While the FAA's NEPA guidance notes that a significant impact can occur with a 1.5 DNL noise level increase to a noise sensitive land area within the 65 DNL and greater noise exposure, the evaluation of a possible constructive use or substantial impairment is based on the potential land use conflicts specifically related to the use of the Section 4(f) resource. For example, while an incompatible noise level on a residence that is identified as a site of local historical importance may not be a constructive use, the potential mitigation through sound insulation could cause a constructive use impact if the mitigation would alter the structure that characterizes its historic significance.

### **Surface Transportation Access**

Potential changes to access to the Section 4(f) resources were evaluated by comparing the existing roadway network and pedestrian routes with the proposed surface transportation system associated with the proposed development. Potential changes in vehicle access to all the 4(f) lands were identified as indirect impacts, constituting an impact that then warranted an evaluation to determine if a constructive use could occur. A constructive use may occur if the project-related surface traffic change would substantially impair the ability for owners or patrons to physically enter or exit the site so that the park usage is substantially impaired.

**Chapter 5.3, Surface Transportation**, of the EIS provides an extensive discussion of surface traffic conditions in the vicinity of O'Hare and discloses the impact of the alternatives.

Traffic congestion is already present within the surface transportation study area. This situation is expected to become worse with the No Action Alternative for each of the four future phases of analysis. When comparing the Build Alternatives to the No Action Alternative for each of the construction phases analyzed, there is a pattern of an increasing congestion at a number of intersections and directional roadway segments. Under the Build Alternatives for the Build Out + 5 Phase, when compared to the No Action Alternative, there are 10 intersections and 13 directional roadway segments that are expected to deteriorate such that they would exceed the threshold of significance.

At Build Out + 5 years, these include:

- Bessie Coleman Drive & Higgins Road (Not available in No Action to LOS F with Build Alt)
- Balmoral Avenue & Des Plaines River Road (from LOS C to LOS F)
- Mannheim Road & Montrose Ave (from LOS C to LOS E)
- Irving Park Road & Main Cargo Road (from LOS B to LOS E)
- Bessie Coleman Drive & Lot E North (Not available in No Action to LOS E)
- York Road & Green Street (from LOS D to LOS E)
- Thorndale Avenue & Busse Road (from LOS D to LOS E)
- Irving Park Road & Prospect Avenue (from LOS E to LOS F)
- York Road & Irving Park Road Ramp (from LOS D to LOS F)
- Irving Park Road & Wood Dale Road (from LOS D to LOS E)

Locations where the either the volume would newly exceed the capacity of the road, or exacerbate locations already exceeding the capacity of the roadways included:

- Mannheim Road (between Montrose and Irving Park)
- Irving Park Road (between Mannheim & Main Cargo)
- Elmhurst Road (northbound between Touhy and I-90)
- Elmhurst Road (southbound between Touhy and I-90)
- Elmhurst Road (northbound, north of Thorndale)
- Elmhurst Road (southbound, north of Thorndale)
- York Road (between Irving Park & Thorndale)
- York Road (between I-290 & Irving Park)
- Busse Road (between I-290 and Irving Park)
- Thorndale Ave (between Wood Dale & Prospect)
- Ramp from WB I-190 to SB I-294
- Thorndale Ave (between Arlington Heights & I-290)
- Ramp from SB Mannheim Rd to EB I-190

This analysis showed that 23 locations would result in worsening surface traffic conditions with any of the Build Alternatives when compared to the No Action Alternative. However, the impact of this traffic on Section 4(f) lands would not prevent patrons of the 4(f) lands from accessing the sites, but would increase the time necessary to enter or exit the site. Based on this analysis, it was concluded that the change in access time would not substantially impair any Section 4(f) resource and therefore would not represent a constructive use.

### **Air Quality**

To analyze air quality impacts on Section 4(f) resources resulting from the proposed Build Alternatives, if selected, the future pollutant concentrations at modeled receptors closest to the Section 4(f) resources were compared with the National Ambient Air Quality Standards (NAAQS). If a Build Alternative would cause exceedances of the NAAQS, further study would be conducted. This would include consultation with the officials having jurisdiction over the resource, to determine whether the use and enjoyment of each property [(i.e. the activities, features, or attributes that qualified each property or resource for protection under Section 4(f))] would be impaired.

**Section 5.6, Air Quality**, of the EIS discloses the air quality impacts associated with the proposed Build Alternatives. A pollutant dispersion evaluation was conducted which included 36 modeled receptor locations that virtually ring airport property. The purpose of that macroscale dispersion modeling was to identify if pollutant concentrations at any perimeter location of the airport would exceed the NAAQS. The analysis showed, for all modeled parameters, pollutant concentrations with any of the Build Alternatives would be well below the NAAQS. A microscale air pollutant concentration analysis was then performed for each of the roadway intersections that would be affected by the proposed Build Alternatives. The microscale concentrations of carbon monoxide were all well below the 1-hour and 8-hour

carbon monoxide standards during all construction phases. The Draft EIS did not include analysis of particulate matter 2.5 microns or less in size, but is discussed below.

In the correspondence that was received by FAA on May 6, 2005 from representatives of St. John's United Church of Christ, Rest Haven Cemetery Association, the Village of Bensenville and Elk Grove Village, issues related to particulate matter 2.5 microns or less in size were raised. In addition, the U.S. Environmental Protection Agency (USEPA) and other commenters on the Draft EIS, requested an evaluation of particulate matter 2.5 microns or less in size. The following paragraphs discuss the current status of this pollutant and trends in concentrations of the pollutant within the Chicago region.

O'Hare International Airport is located within Cook and DuPage counties. These counties are within Illinois Air Quality Control Region Number 67 (the Metropolitan Chicago Interstate (Illinois-Indiana) Region). At the time the air quality analysis was performed for the Draft EIS, the area had not yet been designated with respect to the particulate matter 2.5 microns or less in size NAAQS. Subsequent to the analysis, the USEPA designated Cook and DuPage counties, along with four surrounding counties and partial areas within two additional counties, as non-attainment for this pollutant.<sup>13</sup> Based on the USEPA's scheduled timeline to have all areas of the country attain the standards for particulate matter 2.5 microns or less in size, states are to submit their plans to attain the standard to the USEPA on or before April of 2008.<sup>14</sup>

The IEPA has four air quality monitors in the Chicago area. A review of IEPA's ambient air monitoring data<sup>15</sup> from three of the sites<sup>16</sup> at which the IEPA measured particulate matter 2.5 microns or less in size for the past five years (2000-2004) indicates that while ambient levels of this pollutant have decreased approximately 15 percent (from 17.4 to 14.8 micrograms per cubic meter), regional measured ambient levels exceed the NAAQS. The decrease in regional levels of particulate matter 2.5 microns or less in size is expected to continue as a result of recent rules such as the Clean Air Interstate Rule that will dramatically reduce sulfur dioxide and nitrogen oxide emissions from power plants in the eastern U.S (both sulfur dioxide and nitrogen oxides contribute to fine particle formation). USEPA is also requiring reductions of diesel emissions from new heavy-duty diesel trucks and buses. In 2006, diesel fuel will contain 97 percent less sulfur. This ultra-low sulfur diesel fuel in combination with advanced pollution control technology will mean that in 2007, new trucks and buses will be up to 95 percent cleaner than today's models. Reducing sulfur levels will provide immediate public health benefits by reducing the formation of particulate matter from diesel engine emissions. Finally, the USEPA's Clean Air Nonroad Diesel Rule will reduce nonroad diesel vehicle exhaust emissions by more than 90 percent and fuel sulfur levels by 99 percent. In 2007, the use of clean fuels will begin and in 2008 new engine standards take effect. Although engines within the existing fleet will not be subject to the new regulations, the USEPA and stakeholders are working to:

- Retrofit existing diesel vehicles with pollution controls.
- Implement emission testing programs for diesel vehicles.

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<sup>13</sup> 40 CFR Part 81 (<http://www.epa.gov/pmdesignations/documents/final/part81.htm>)

<sup>14</sup> <http://www.epa.gov/pmdesignations/documents/120/timeline.htm>.

<sup>15</sup> USEPA's AirData: <http://www.epa.gov/air/data/index.html>

<sup>16</sup> 13<sup>th</sup> Street/50<sup>th</sup> Avenue in Cicero, 1745 N. Springfield and 4850 Wilson Avenue in Chicago. The Schiller Park monitor could not be used because only one year of data had been collected.

- Create and implement anti-idling programs.
- Promote cleaner fuels like ultra-low sulfur diesel and compressed natural gas.
- Promote cost-effective environmentally-friendly practices within the freight industry through EPA's voluntary SmartWay Transport Partnership.

The Draft EIS did not include analysis of particulate matter 2.5 microns or less in size emissions because aircraft PM emissions data was not available to conduct an estimate of aircraft engine emissions with scientific integrity as required under the CEQ regulations (1502.24). Such an analysis was also not prepared because at the time the Draft EIS was prepared, FAA concluded that acceptable methodologies for preparing emission inventories and conducting dispersion modeling for particulate matter 2.5 microns or less in size had not yet been established. Since issuance of the Draft EIS, the FAA has been working to develop an interim methodology for estimating aircraft particulate matter 2.5 microns or less in size emissions using the EDMS model while the science, regulatory, industry, and international communities continue further work on identifying a common methodology for measuring and dispersing particulate matter 2.5 microns or less in size emissions from aircraft engines. As noted above, USEPA and others made comments on the Draft EIS regarding potential particulate matter 2.5 microns or less in size emissions and/or impacts. In response to comments on the Draft EIS and comments provided in the previously noted May 6, 2005 comments regarding particulate matter 2.5 microns or less in size, the FAA has included the following analysis.

#### **Analysis of Particulate Matter 2.5 Microns or Less in Size on Section 4(f) Resources**

The USEPA describes particulate matter as the particles found in the air which include dust, dirt, soot, smoke, and liquid droplets.<sup>17</sup> Some particles are directly emitted into the air. These particles come from a variety of sources including cars, trucks, buses, factories, construction sites, unpaved roads, and from wood burning. Other particles may be formed in the air from the chemical change of gases. These particles are indirectly formed when gases from burning fuels react with sunlight and water vapor.

Prior to July of 1997, the NAAQS for particulate matter addressed particles 10 microns or less in size. In 1997, the USEPA revised the NAAQS to address particulate matter 2.5 microns or less in size. The standards (a 24-hour and an annual standard) were promulgated because the USEPA determined that particles of this size are associated with serious health effects and with increased hospital admissions and emergency room visits for people with heart and lung diseases.<sup>18</sup> Subsequent to the USEPA revisions to the standards, the standards were challenged by numerous litigants. Following review of the litigant's complaints, the U.S. Court of Appeals remanded, but did not vacate, the standards. Subsequently, the U.S. Supreme Court upheld the standards and the U.S. Court of Appeals rejected all remaining challenges to implementing the standards (March of 2002). After all remaining challenges to the standards were rejected; the USEPA began implementing the standards.

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<sup>17</sup> <http://www.epa.gov/air/urbanair/pm/what1.html>

<sup>18</sup> <http://www.epa.gov/air/urbanair/pm/chf.html>

On January 5, 2005, the USEPA designated all areas of the country as being attainment, non-attainment, or unclassifiable with respect to the new standards (the effective date of the designations was April 5, 2005).<sup>19</sup>

In response to comments on the Draft EIS for the proposed improvements to O'Hare, the FAA evaluated the effect of the proposed improvements on ambient (outdoor) levels of particulate matter 2.5 microns or less in size at various sites (parks, historic properties, forest preserves, and recreational areas) in the vicinity of the Airport. The following summarizes the methodology used to perform the evaluation (including a discussion of the uncertainties and limitations with such an evaluation), the sites that were evaluated, and the results of the evaluation.

### **Methodology**

Prior to Scoping, FAA met with USEPA and the IEPA representatives to identify their concerns and to initiate the development of the air quality assessment methodologies. The methodologies were structured to best address the agencies concerns. FAA's ongoing coordination included development of an air quality protocol<sup>20</sup> which established rigorous analytic methodologies for the air quality assessment of the proposed improvements to O'Hare. The Protocol was discussed with the USEPA and the IEPA and subsequently modified based on input from these Agencies. As stated in the Protocol, data (emission factors) for particulate matter 2.5 microns or less in size from the sources that were included in the air quality analysis analyses are limited. This is especially true with respect to aircraft-related emissions of particulate matter 2.5 microns or less in size. The lack of, and methodology used to estimate, emissions of this pollutant from aircraft is briefly discussed in this document. Detailed information on the approximation of the emissions is provided in **Section J.2.2.1, Aircraft of the FEIS**, in **Appendix J, Air Quality**.

The evaluation of particulate matter 2.5 microns or less in size at sites in the vicinity of O'Hare was performed using dispersion analysis. Emission inventories, another air quality assessment technique, served as the base for the input to the computer model which was used to perform the dispersion analysis.

### ***Emission Inventories***

The following categories of sources were inventoried: aircraft, ground support equipment, auxiliary power units, motor vehicles on roadways (both on Airport and within a defined study area off Airport property) and at curbsides and parking facilities located on Airport property, fuel storage facilities, Airport-related fire training activities, on Airport stationary sources (boilers, generators, etc.), and various construction equipment/activities. The limits of the motor vehicle study area were assumed to be the same as the limits used to evaluate surface transportation (**Exhibit 5.6-4 of the FEIS**).

***Sources Other Than Construction Equipment/Activities*** – For sources other than construction equipment/activities and aircraft, the emission inventories were prepared using the FAA's

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<sup>19</sup> Federal Register, January 5, 2005: Air Quality Designations for the Fine Particles (particulate matter 2.5 microns or less in size) National Ambient Air Quality Standards; Final Rule.

<sup>20</sup> Air Quality Analysis Protocol – Criteria Air Pollutants, August 5, 2003.

Emissions and Dispersion Modeling System (EDMS-Version 4.12).<sup>21</sup> Use of this model is required by the FAA when evaluating airport-related emissions at civilian airports and military air bases.<sup>22</sup> The EDMS was developed by the FAA in cooperation with the United States Air Force. EDMS prepares emission inventories of particulate matter with a diameter of 10 microns or less for all sources except construction equipment/activities and aircraft. The version of EDMS used to perform the analysis of the proposed improvements to O'Hare does not provide estimates of particulate matter 2.5 microns or less in size for any source.

In order to provide estimates of particulate matter 2.5 microns or less in size from aircraft, mode-specific particulate matter emission factors were developed for the turbine (jet) engines evaluated in the O'Hare-related air quality assessment. The factors were developed using methodologies prepared by/for the FAA.<sup>23</sup> It should be noted that the FAA considers the estimated levels of aircraft-related particulate matter emissions using these methodologies to be conservative approximations of the actual level of aircraft-related emissions. Additional details regarding the emission factors that were used to approximate the aircraft-related particulate matter emissions are provided in **Section J.2.2.1, Aircraft of the FEIS**, in **Appendix J, Air Quality**.

**Construction** – Pollutant emissions resulting from activities associated with the construction of the proposed runways, extended runways, proposed and extended taxiways, proposed terminals, parking facilities, and roadways were also estimated. Data regarding the number of pieces and types of construction equipment to be used on the project, the deployment schedule of equipment (monthly and annually), and the approximate daily operating time (including power level or usage factor) were estimated for each individual construction project based on a schedule of construction activity. These estimates were prepared by the City's consulting team (CCT) and used in the analysis after review and acceptance by the TPC. The estimates were provided by project phase, by subcomponent, and by month.

The emission inventories of particulate matter 2.5 microns or less in size from off-road (non-highway) equipment were calculated using emission factors for particulate matter 10 microns or less in size obtained from the USEPA's Non-Road Engine and Vehicle Emission Study,<sup>24</sup> the NONROAD model (Version 2.2.0)<sup>25</sup> databases and support information, and/or the Compilation of Air Pollutant Emission Factors (AP-42). Emission factors for on-road (highway) pickup, flat bed, bucket, and dual tandem trucks were obtained from the MOBILE6.2 motor vehicle emission rate model. Estimates of emissions attributable to construction-related employee vehicle trips were also evaluated, as well as onsite busing. Emission estimates of fine particulate matter were assumed to be 92 percent of the particulate matter 10 microns in size or less estimates.

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<sup>21</sup> Emissions and Dispersion Modeling System (EDMS) Reference Manual, U.S. Department of Transportation, Federal Aviation Administration, Office of Environment and Energy, Washington, DC. Version 4.12, December 2003.

<sup>22</sup> 63 Federal Register 18068 (Monday, April 13, 1998).

<sup>23</sup> Fleming, Gregg et al. 2003. "Derivation of a First Order Approximation of Particulate Matter from Aircraft" 96<sup>th</sup> Annual Conference and Exhibition of the Air and Waste Management Association, San Diego, CA, June 22-26, 2003, Paper #69970 and FAA Memorandum, Use of the First Order Approximation to Estimate Aircraft Engine Particulate Matter Emissions in NEPA Documents and Clean Air Act General Conformity Analyses, May 24, 2005

<sup>24</sup> Nonroad Engine and Vehicle Emission Study – Report, U.S. Environmental Protection Agency, Office of Transportation and Air Quality, Research Triangle Park, NC., Report number EPA-460/3-91-02, November 1991.

<sup>25</sup> NONROAD, Version 2.2.0, December, 2002. U.S. Environmental Protection Agency.

As requested by the IEPA during Scoping, an estimate of potential air pollutant emissions resulting from demolition of residences and businesses was also prepared. Emission estimates of particulate matter 10 microns in size or less due to demolition were calculated based on the size of each building to be demolished and a factor of 0.00042 pounds of particulate matter per cubic foot of building.<sup>26</sup> Emission estimates of fine particulate matter were assumed to be 40 percent of the particulate matter 10 microns in size or less estimates.

Table L-3 summarizes the factors used to convert estimates of particulate matter 10 microns or less in size to particulate matter 2.5 microns or less in size.

**TABLE L-3  
CONVERSION FACTORS**

Pollutant Conversion	Source	Conversion Factor	Reference
Particulate Matter 10 Microns or Less in Size to	Aircraft	1.00	FAA Memo May 24, 2005
	GSE, Diesel	0.97	USEPA NONROAD model.
Particulate Matter 2.5 Microns or Less in Size	GSE, Gasoline	0.92	USEPA NONROAD model.
	Boiler, Natural Gas	1.00	AP-42, Vol.1, Table 1.4-2, Note c.
	Boiler, Oil	0.25	AP-42, Vol.1, Table 1.3-6
	Motor Vehicles	0.60	USEPA MOBILE6.2
	Construction Equipment	0.92	USEPA NONROAD model.

Source: Environmental Science Associates, Inc. [TPC] analysis, 2005

### *Dispersion Analysis*

Dispersion modeling provides predicted concentrations of ambient pollutant levels for all criteria pollutants and precursors that can be compared directly to the NAAQS. Dispersion modeling results can also be used to evaluate the change in ambient pollutant concentrations at a location.

The dispersion analysis for particulate matter 2.5 microns or less in size was performed using the FAA's EDMS (Version 4.12). The EDMS uses as its base, the emission inventory data discussed above and site-specific meteorological data. EDMS provides dispersion analysis for the air pollutant particulate matter 10 microns or less in size for all sources except aircraft. Notably, user-created emission factors for aircraft-related particulate matter 10 microns or less in size were used in the EDMS to provide the dispersion analysis for particulate matter 10 microns or less in size. Emission estimates of aircraft-related fine particulate matter were assumed to be 100 percent of the particulate matter 10 microns in size or less estimates.

Finally, in addition to the sources within the defined study area, background concentrations were "added" to computer predicted levels of each pollutant. The background concentrations account for emissions from sources outside of the defined study area for the O'Hare assessment. The background levels used in the air quality analysis for particulate matter 2.5 microns or less in size were provided by the IEPA for the purpose of the evaluation of this pollutant. The IEPA derived the background levels from measured data from their Des Plaines monitoring location (a 24-hour background level of 35.2 micrograms per cubic meter and an annual background level of 13.3 micrograms per cubic meter).

<sup>26</sup> South Coast Air Quality Management District, CEQA Air Quality Handbook, May 1993. Table A9-9, Estimating PM10 Emissions from Fugitive Dust.

It should be noted that the dispersion modeling component of the EDMS used to perform the air quality assessment of the O'Hare improvements does not include algorithms that simulate the gravitational settling of particulates nor the removal of particulates from the ambient air by dry deposition<sup>27</sup>. The model also does not include algorithms to simulate the scavenging and removal by wet deposition (i.e., precipitation scavenging) of gases or particulates. As such, the dispersion modeling results for particulate matter 2.5 microns or less in size is considered conservative as consideration of these factors, and other factors, including the removal of particles by attachment to trees, buildings, and other objects, would reduce the predicted results.

### *Evaluated Sites*

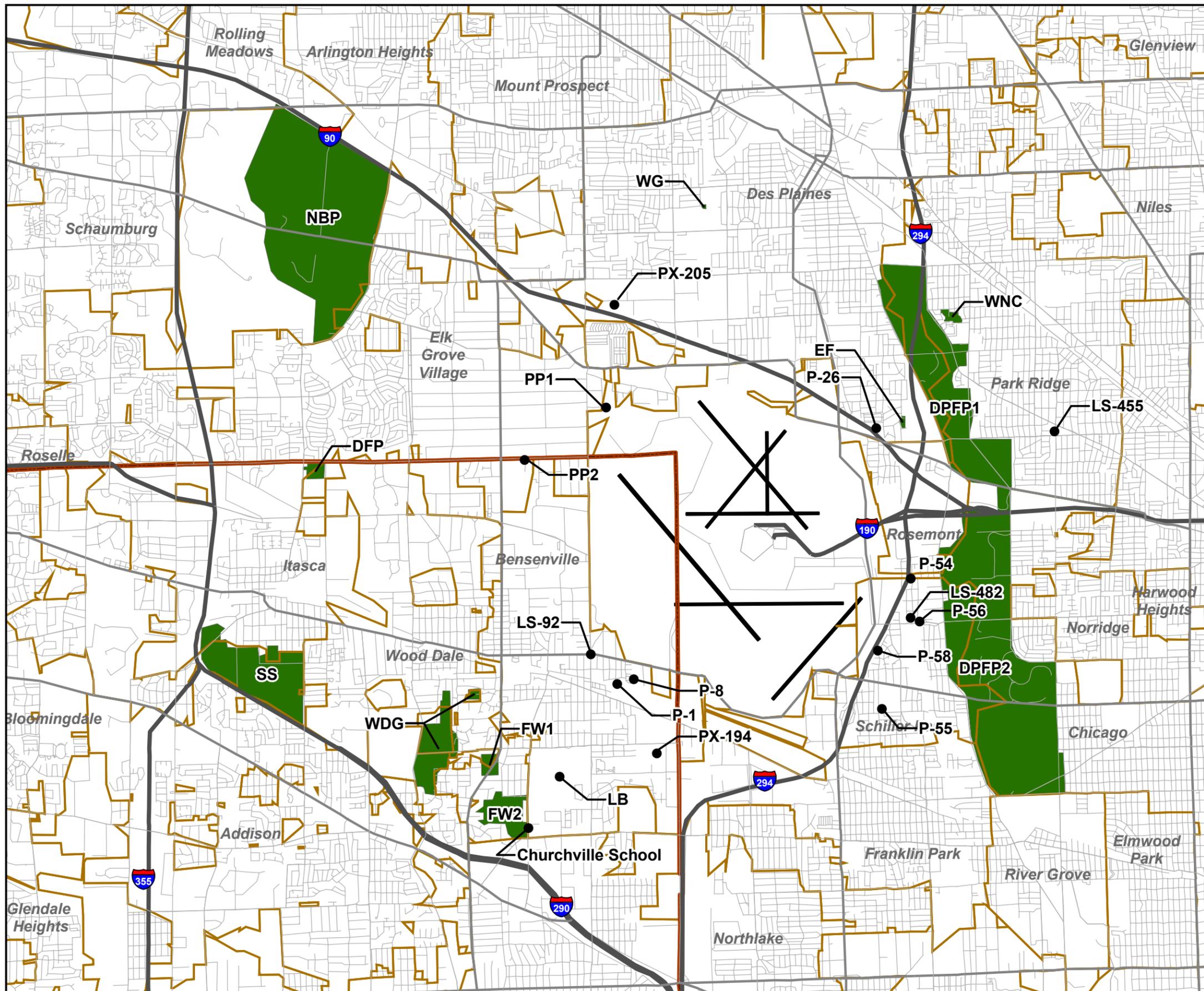
Twenty-seven sites were selected for the evaluation based on a review of land uses in the vicinity of O'Hare. These sites included the forest preserves and recreational areas within the study area, parks, pocket parks<sup>28</sup>, and historic sites. To be conservative, the sites closest to the existing Airport property were selected. Notably, the estimated levels of particulate matter 2.5 microns or less in size at sites further from the evaluated sites would be less than those presented/discussed in this document. **Table L-4** lists the evaluated air quality sites. **Exhibit L-15** identifies the locations of the evaluated sites.

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<sup>27</sup> Atmospheric deposition occurs when pollutants fall from the air on the land or water. Pollution deposited along with snow, fog, or rain is called wet deposition, while the deposition of pollutants as dry particles or gases is called dry deposition.

<sup>28</sup> A small area of open space that is developed and maintained for active or passive recreational use by the residents of a neighborhood or development.

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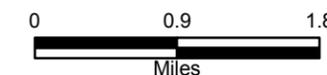
Source: Municipal Boundaries: US Census Bureau, Census 2000. County Park/Forest Preserves. Municipal Park Districts



Chicago  
O'Hare  
International  
Airport

**O'Hare Modernization  
Section 303/4(f) and 6(f) Evaluation**

- Sites Evaluated
- Freeway
- Highway
- Local Roads
- Community Boundaries
- Forest Preserves/Recreation Areas



**Sites Evaluated for Particulate  
Matter 2.5 Microns or Less**

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**TABLE L-4  
EVALUATED AIR QUALITY SITES**

Number	Receptor ID	Receptor Description
1	NBP	Neb Brown Preserve
2	WG	Westfield Gardens
3	WNC	Wildwood Nature Center
4	DPFP1	Des Plaines River Forest Preserve
5	DPFP2	Des Plaines River Forest Preserve
6	LB	Legends of Bensenville
7	FW1	Fischer Woods
8	FW2	Fischer Woods
9	WDG	Wood Dale Grove
10	SS	Songbird Slough
11	DFP	DuPage Co. Forest Preserve
12	EF	Eaton Field
13	PX205	PX-205
14	P27	P-27
15	P66	P-66
16	P68	P-68
17	P70	P-70
18	P67	P-67
19	PX194	PX-194
20	P8	P-8
21	P1	P-1
22	PP2	PP-2
23	PP1	PP-1
24	LS455	LS-455
25	CS	Churchville School
26	LS482	LS-482
27	LS92	LS-92

## Results

The results of the macroscale dispersion analysis for particulate matter 2.5 microns or less in size at evaluated sites in the vicinity of O'Hare are summarized in **Table L-5**. As shown, the maximum estimated 24-hour concentration of this pollutant with or without the proposed improvements at O'Hare is 38 micrograms per cubic meter. The NAAQS for 24-hour concentrations of this pollutant is 65 micrograms per cubic meter. As such, with or without the improvements, concentrations of this pollutant are not estimated to exceed the 24-hour NAAQS at any of the sites evaluated.

Based on the results of the analysis, the greatest estimated 24-hour concentration of particulate matter 2.5 microns or less in size would occur at Site 27 (LS92). This site is, located near the intersection of Irving Parkway and York Road (southwest of O'Hare). The predicted concentration at this location is dominated by the contribution of particulate matter 2.5 microns less in size from motor vehicle traffic sources (over 99 percent of the total predicted concentration).

The greatest increase in 24-hour levels of particulate matter 2.5 microns or less in size when compared to Alternative A (No Action) would occur at Site 20 (P-8) at the end of Construction Phase II (a 3.6 percent increase). Site 20 (P8) is also located near the intersection of Irving

Parkway and York Road. The increase at this location is again dominated by motor vehicle traffic (90 percent). A portion of the increase could also be attributed to the realignment of Irving Parkway with the proposed improvements. At all of the other sites, the 24-hour level of particulate matter would decrease, remain essentially the same, or increase less than the level at Site 20.

As also shown in **Table L-5**, the greatest annual arithmetic mean concentration of particulate 2.5 microns or less in size with or without the proposed improvements to O'Hare is 13 micrograms per cubic meter. The NAAQS for annual concentrations of this pollutant is 15 micrograms per cubic meter. As such, with or without the improvements, concentrations of this pollutant are not estimated to exceed the annual NAAQS at any of the sites evaluated.

The greatest increase in annual levels of particulate matter 2.5 microns or less in size with any of the Build Alternatives or construction scenarios when compared to Alternative A (No Action) is predicted to occur at Sites 14 and 15 (P-66 and P-27, respectively). At these sites, the greatest increase in emissions would be less than 0.1 percent regardless of construction phase or time period evaluated. Notably, even with this increase, concentrations are not predicted to exceed the annual NAAQS for particulate matter 2.5 microns or less in size. At all of the other sites, the annual level of particulate matter would decrease, remain essentially the same, or increase less than the level at Sites 14 and 15.

**TABLE L-5  
MAXIMUM MACROSCALE DISPERSION MODELING RESULTS – PARTICULATE  
MATTER 2.5 MICRONS OR LESS IN SIZE**

Sources	Original/Compressed Construction Schedule				Delayed Construction Schedule					
	24-Hour	Phase I	Phase II	Build-Out	Build-Out		Phase I	Phase II	Build-Out	Build-Out
					+5	+5				
NAAQS(b)	65	65	65	65	65	65	65	65	65	65
Annual	15	15	15	15	15	15	15	15	15	15
<b>24-HOUR</b>										
<b>Alternative A</b>										
Receptor No. and ID (c)	27 (LS92)	17 (P70)	26 (LS482)	17 (P70)	27 (LS-92)	17 (P-70)	26 (LS-482)	17 (P-70)	26 (LS-482)	17 (P-70)
Predicted Concentration	38	37	37	37	38	37	37	37	37	37
<b>Alternatives C, D, and G</b>										
Receptor No. and ID (c)	27 (LS92)	20 (P8)	26 (LS482)	26 (LS482)	27 (LS92)	20 (P8)	26 (LS482)	26 (LS482)	26 (LS482)	26 (LS482)
Predicted Concentration	38	37	37	37	38	37	37	37	37	37
Percent Increase/Decrease (d)	-0.2	3.6	0.1	0.1	-0.7	3.6	0.1	0.1	0.1	0.1
<b>ANNUAL ARITHMETIC MEAN</b>										
<b>Alternative A</b>										
Receptor No. and ID (c)	10 (SS)	10 (SS)	10 (SS)	10 (SS)	10 (SS)	10 (SS)	10 (SS)	10 (SS)	10 (SS)	10 (SS)
Predicted Concentration	13	13	13	13	13	13	13	13	13	13
<b>Alternatives C, D, and G</b>										
Receptor No. and ID(c)	10 (SS)	10 (SS)	10 (SS)	10 (SS)	10 (SS)	10 (SS)	10 (SS)	10 (SS)	10 (SS)	10 (SS)
Predicted Concentration	13	13	13	13	13	13	13	13	13	13
Percent Increase/Decrease(d)	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1	<0.1

Notes: (a) Alternative A = No Action, Alternative C, D, and G are "Build Alternatives."

(b) NAAQS = National Ambient Air Quality Standard

(c) See Exhibit L-15

(d) When compared to concentrations with Alternative A at the site identified with the Build Alternatives.

Source: Environmental Science Associates, Inc. [TPC] analysis, 2005.

## Water Quality

As is noted in EIS Section 5.7, **Water Quality**, all three Build Alternative would result in an increase in airport area within the Willow-Higgins Creek watershed, with a commensurate reduction in the Bensenville Ditch/Silver Creek watershed. No changes would occur in the Crystal Creek watershed (or areas draining to the Des Plaines River). Compared to the No

Action Alternative, the potential for water quality impacts under Alternatives C, D, or G would be greater due to the increase in impervious surface area, additional airside areas using deicing chemicals, and substantial construction activity. However, the increase in potential water quality impacts would not be significant because, in addition to the efforts to reduce contamination to surface water from deicing chemicals, adequate stormwater facilities, designed to manage, contain, and convey the calculated increases in stormwater, have been designed and would be constructed as part of each of the Build Alternatives. During winter conditions, stormwater from the North and South Airfield would contain deicing chemicals and the drainage would be routed to detention basins prior to conveyance to the MWRDGC Stickney Treatment Plant. Further, all discharges to receiving streams would occur in accordance with permitted limits. Therefore, no adverse water quality impacts were identified, and no impacts to Section 4(f) lands would occur.

### Visual/Aesthetics

Visual impacts were evaluated by considering the existing viewsheds at applicable Section 4(f) land location and comparing them with the projected viewshed for the proposed improvements. Potential changes in view attributable to the proposed airport expansion were evaluated to determine if there would be a constructive use that would substantially impair the Section 4(f) resource or affect the "aesthetic value" of the resource.

Section 4(f) lands that could be affected by aesthetic issues would be limited to sites on airport or sites in close proximity where airport development could be visible. The following sites meet these requirements:

- P-58 William Dooley Memorial Park (Schiller Park)
- HP-5 Gas Service Station
- HP-6\* Rest Haven Cemetery
- HP-7\* St. Johannes/John's Cemetery
- HP-8\* United Terminal 1 and CTA Station
- HP-9\* Old Control Tower
- HP-10\* Schwerdtfeger Farmstead

\* These sites are pending determination of eligibility on the NRHP.

William Dooley Memorial Park is located east of I-294 and Mannheim Road, which both serve as a buffer between the park and airport property. Therefore, no visual impacts would be expected from development at O'Hare. The Gas Service Station, Rest Haven Cemetery, St. Johannes Cemetery, and Schwerdtfeger Farmstead would be directly affected by all of the proposed Build Alternatives through acquisition and removal. The remaining sites, United Terminal 1/CTA Station and the Old Control Tower would not be affected by airport development, as these facilities are airport-related structures physically located on the airport, whose setting/context is based on an active airport. Therefore, no further analysis of visual/aesthetic impacts is necessary.

## L.2.2 Parks/Recreational Resources

Section 4(f) lands are defined as “any publicly owned land from a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance or land from an historic site of national, State, or local significance.”<sup>29</sup> Public parks, recreational areas, and wildlife and waterfowl refuge sites were identified based on local maps. Parks were verified for existence, location, jurisdictional limits, and physical facilities. Park inventory forms and photographs for individual park sites are included in **Attachment L-4**.

Subsequent to the identification of parks in the vicinity of O'Hare, supplemental data was submitted for consideration in this Section 4(f) Evaluation. This data is included in **Attachment L-2** and the analysis of this data is incorporated in this study, where appropriate. The name of each park, as well as the site number and location, is provided in **Table L-2**. The locations of the individual parks in relation to O'Hare are shown in **Exhibit L-5**. None of the supplemental resources identified in the May 6, 2005 documents are included within the 65 DNL noise contours for any of the Build Alternatives. Further, none of the “Pocket Parks” identified in the April 29, 2005 supplemental data would be acquired under any of the Build Alternatives, if selected. All of the parks identified in this correspondence reflect active recreational use facilities which are compatible with aircraft noise up to 75 DNL. As shown in **Table L-7**, projected noise levels at these “Pocket Parks” are anticipated to be below the FAA's land use compatibility criteria of 75 DNL for active recreational facilities, or parks. Consequently, no direct or indirect impacts to these resources are anticipated.

The next task in the study process was to evaluate the Build Alternatives carried forward for consideration with respect to potential impacts to existing park resources. Analyses of potential direct and indirect impacts on these park resources were identified.

## L.2.3 Historic Sites

For the identification of lands subject to the definition of historic, the Federal Highway Administration (FHWA) Policy Paper<sup>30</sup> was consulted. Specifically, the response to question 3a of this Policy Paper states:

For purposes of Section 4(f), a historic site is significant only if it is on or eligible for the National Register of Historic Places, unless the FHWA determines that the application of Section 4(f) is otherwise appropriate. If a historic site is determined not to be on or eligible for the National Register of Historic Places, but an official (such as the Mayor, President of the local historic society, etc.) provides information to indicate that the historic site is of local significance, FHWA may apply Section 4(f).

The Criteria of Effect and Adverse Effect, as defined in 36 CFR 800.5, were used to evaluate the Build Alternatives' impact on NRHP properties.

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<sup>29</sup> 49 U.S.C. Section 303(c).

<sup>30</sup> FHWA Section 4(f) Policy Paper, September 1987, Updated June 1989.

(1) Criteria of adverse effect.

An adverse effect is found when an undertaking may alter, directly or indirectly, any of the characteristics of a historic property that qualify the property for inclusion in the National Register in a manner that would diminish the integrity of the property's location, design, setting, materials, workmanship, feeling, or association. Consideration shall be given to all qualifying characteristics of a historic property, including those that may have been identified subsequent to the original evaluation of the property's eligibility for the National Register. Adverse effects may include reasonably foreseeable effects caused by the undertaking that may occur later in time, be farther removed in distance or be cumulative.

(2) Examples of adverse effects. Adverse effects on historic properties include, but are not limited to:

- (i) Physical destruction of or damage to all or part of the property;
- (ii) Alteration of a property, including restoration, rehabilitation, repair, maintenance, stabilization, hazardous material remediation and provision of handicapped access, that is not consistent with the Secretary's Standards for the Treatment of Historic Properties (36 CFR part 68) and applicable guidelines;
- (iii) Removal of the property from its historic location;
- (iv) Change of the character of the property's use or of physical features within the property's setting that contribute to its historic significance;
- (v) Introduction of visual, atmospheric or audible elements that diminish the integrity of the property's significant historic features;
- (vi) Neglect of a property which causes its deterioration, except where such neglect and deterioration are recognized qualities of a property of religious and cultural significance to an Indian tribe or Native Hawaiian organization; and
- (vii) Transfer, lease, or sale of property out of Federal ownership or control without adequate and legally enforceable restrictions or conditions to ensure long-term preservation of the property's historic significance.

A review was conducted first of properties on or eligible for the National Register of Historic Places. In several cases, a Determination of Eligibility was conducted for sites. In cases where the FAA determined that the site was not eligible, these sites were then considered potentially locally important. Locally important historical sites were then identified as noted below. The following sections discuss these historical sites and sites of local historical importance.

### **L.2.3.1 Sites On or Eligible for the National Register**

The identification of historic sites began with identifying sites on or eligible for inclusion of the National Register of Historic Places (NRHP). **Table L-2** lists the 13 sites on or eligible for the NRHP.

### **L.2.3.2 Locally Important Historic Sites**

The Draft EIS contained a Section 4(f) and 6(f) lands review for those properties that are on, or eligible for inclusion on the National Register of Historic Places. This Section 4(f) and 6(f) Evaluation considers the sites identified in the Draft EIS, as well as the sites identified of local historical importance. To identify possible sites of local interest, a background documents and literature search was conducted from June 2004 through August 2004. A background literature

and document search was conducted on historical, architectural and cultural properties within the vicinity of O'Hare. This existing data were reviewed in conjunction with field photograph reconnaissance. The data were analyzed to determine the potential environmental consequences to each Site of Historic Interest.

The background documentary and literature search was compiled from a number of resources. These sources include:

- National Historic Landmarks
- National Register of Historic Places
- Illinois - State Register of Historic Places
- Certified Local Governments consulted for recognized local community preservation groups and listings of locally recognized historic properties
- 1971-1975 County Landmark Survey housed at IHPA includes properties that IHPA surveyors thought had countywide historical significance (It is important to note that these are not county-designated properties)
- 1974-1975 Sprague Survey housed at IHPA
- IHPA historic site files, which are a collection of folders in which miscellaneous material about various historic properties are collected from over the years.
- Local municipal historical societies were contacted to obtain lists of locally important sites of historic interest. See **Appendix L-5** for a copy of the Correspondence Log that documents the contact information from the local municipal historical societies.
- Supplemental data submitted by representatives of St. John's United Church of Christ, Rest Haven Cemetery Association, Village of Bensenville, and Elk Grove Village. See **Attachment L-2**.

**Table L-6** lists the 151 sites that were identified by the sources above. Of the 151 sites, 17 were found as: 1) sites that had been demolished since publication of the source, 2) duplicates of other sites, and 3) incorrect address (sites could not be located). This list was then narrowed to 134 possible locally important historic sites. Of the 134 sites, these lands consist of:

- 2 churches (Peace Church LS-57 and St. John's United Church of Christ LS-62)
- 2 schools (Tioga School LS-79 and Chippewa School LS-88)
- 3 museum-related uses (Bensenville's railroad monument LS-66 in Veteran's Park, Korhauer Log House LS-86, and Elk Grove Park District Farmhouse Museum LSS-3)
- 1 memorial (Franzen's Mill Memorial LS-91)
- 1 cemetery (Elk Grove Cemetery)
- 6 commercial/retail buildings (Theater/Stores LS-58, Pease Church Manse LS-63, Janker's Building LS-90, LS-249, LS-289, LS-461)

- 119 residences (57 residences in Bensenville, 53 in Park Ridge, 3 in Schiller Park, 2 in WoodDale, 1 representing the Durocraft homes in Harwood Heights, and 3 in Elk Grove Village)

Based on the previously stated sources, as well as the recent supplemental data submitted by representatives of St. John's United Church of Christ, Rest Haven Cemetery Association, Village of Bensenville, and Elk Grove Village, the data indicate that there are 134 sites of local historic importance that the FAA considered relative to Section 4(f) eligibility in this Section 4(f) and 6(f) Evaluation. FAA has included the sites of local historic importance based on the FHWA guidance which states:

If a historic site is determined not to be on or eligible for the National Register of Historic Places, but an official (such as the Mayor, President of the local historic society, etc.) provides information to indicate that the historic site is of local significance, FHWA may apply Section 4(f).

Consideration was given by FAA as to the application of Section 4(f) to these lands and possible impacts of the proposed Build Alternatives. **Table L-7** identifies the estimated noise exposure associated with each locally important historic site. A comparison was then made to the FAA's land use compatibility guidelines to determine potential incompatible resources.

**TABLE L-6  
LOCALLY IMPORTANT HISTORIC SITES**

Map-ID	Name	Function	Address	City	Source
LS-57	Peace Church	Church	192 S. Center	Bensenville	Local Municipal Landmark
LS-58	Theatre/stores	Retail; Commercial	9-23 S. Center; Theatre is 9 S.	Bensenville	Local Municipal Landmark
LS-59	Residence	Domestic; single dwelling	164 S. Center	Bensenville	IHPA Sprague Survey
LS-62	St. John Church	Church	601-3 N. Rt. 83	Bensenville	IHPA DuPage County Landmark; DuPage County Cultural & Historical Inventory
LS-63	Peace Church Manse	Professional Centre	100 W. Green	Bensenville	Local Municipal Landmark
LS-66	Railroad Monument	NFP Museum; Locomotive Memorial	Main & Church	Bensenville	Local Municipal Landmark
LS-73	Residence	Domestic; single dwelling	214 Park St.	Bensenville	IHPA Sprague Survey
LS-75	Residence	Domestic; single dwelling	165 S. York Rd.	Bensenville	IHPA Sprague Survey
LS-76	Residence	Unknown	180 S. York Rd.	Bensenville	IHPA Sprague Survey
LS-79	Tioga School	Education; school	212 Memorial Street	Bensenville	Local Municipal Landmark
LS-83	A. G. Chessman	Domestic; single dwelling	18W133 Thorndale Rd.	Bensenville	IHPA Cultural Resource Management Survey
LS-86	Korthauer Log House	NFP Museum; owned by library	Wood Street (Ellis & Church)	Bensenville	IHPA DuPage County Landmark; DuPage County Cultural & Historical Inventory
LS-88	Chippewa School, formerly BHS	Education; school	322 S. Center	Bensenville	Local Municipal Landmark
LS-90	Janker's Building	Retail; Commercial; Residential	202 W. Addison	Bensenville	Local Municipal Landmark
LS-91	Franzen's Mill Memorial	Memorial	200 Church Street	Bensenville	IHPA DuPage County Landmark Survey
LS-249	Commercial	Commerce/Trade	NW corner Rose & Franklin	Franklin Park	IHPA Sprague Survey
LS-251	Durocraft Homes	Residential	Durocraft Homes District (70 buildings)	Harwood Hts.	Local Municipal Landmark
LS-289	Commercial	Commerce/Trade	15-19 Prospect Ave.	Park Ridge	IHPA Sprague Survey
LS-320	Hodges House	Domestic; single dwelling	325 Oak Street	Park Ridge	IHPA Cook County Landmark Survey

**TABLE L-6  
LOCALLY IMPORTANT HISTORIC SITES**

Map-ID	Name	Function	Address	City	Source
LS-333	Residence	Domestic; single dwelling	316 S. Fairview	Park Ridge	IHPA Sprague Survey
LS-335	Residence	Domestic; single dwelling	332 Vine	Park Ridge	IHPA Sprague Survey
LS-336	Residence	Domestic; single dwelling	404 Vine	Park Ridge	IHPA Sprague Survey
LS-340	Residence	Domestic; single dwelling	514 S. Vine	Park Ridge	IHPA Sprague Survey
LS-343	Residence	Domestic; single dwelling	430 W. Talcott	Park Ridge	IHPA Sprague Survey
LS-357	Residence	Domestic; single dwelling	1521 S. Prospect Ave.	Park Ridge	IHPA Sprague Survey
LS-359	Residence	Domestic; single dwelling	316 S. Prospect Ave.	Park Ridge	IHPA Sprague Survey
LS-361	Residence	Domestic; single dwelling	413 S. Prospect Ave.	Park Ridge	IHPA Sprague Survey
LS-362	Residence	Domestic; single dwelling	500 S. Prospect Ave.	Park Ridge	IHPA Sprague Survey
LS-363	Residence	Domestic; single dwelling	601 S. Prospect Ave.	Park Ridge	IHPA Sprague Survey
LS-364	Residence	Domestic; single dwelling	715 S. Prospect Ave.	Park Ridge	IHPA Sprague Survey
LS-368	Residence	Domestic; single dwelling	422, 424, & 428 W. Talcott	Park Ridge	IHPA Sprague Survey
LS-369	Residence	Domestic; single dwelling	429 W. Talcott	Park Ridge	IHPA Sprague Survey
LS-370	Residence	Domestic; single dwelling	412 S. Prospect Ave.	Park Ridge	IHPA Sprague Survey
LS-371	Residence	Domestic; single dwelling	203 W. Columbia	Park Ridge	IHPA Sprague Survey
LS-378	Residence	Domestic; single dwelling	600 S. Clifton	Park Ridge	IHPA Sprague Survey
LS-379	Residence	Domestic; single dwelling	404 S. Fairview	Park Ridge	IHPA Sprague Survey
LS-381	Residence	Domestic; single dwelling	842 W. Courtland	Park Ridge	IHPA Sprague Survey
LS-382	Residence	Domestic; single dwelling	202 W. Columbia	Park Ridge	IHPA Sprague Survey
LS-384	Residence	Domestic; single dwelling	300 Courtland	Park Ridge	IHPA Sprague Survey
LS-385	Residence	Domestic; single dwelling	1429 S. Courtland	Park Ridge	IHPA Sprague Survey
LS-386	Residence	Domestic; single dwelling	1439 S. Courtland	Park Ridge	IHPA Sprague Survey

**TABLE L-6  
LOCALLY IMPORTANT HISTORIC SITES**

Map-ID	Name	Function	Address	City	Source
LS-388	Residence	Domestic; single dwelling	308 W. Courtland	Park Ridge	IHPA Sprague Survey
LS-389	Residence	Domestic; single dwelling	321 W. Courtland	Park Ridge	IHPA Sprague Survey
LS-390	Residence	Domestic; single dwelling	412 W. Courtland	Park Ridge	IHPA Sprague Survey
LS-391	Residence	Domestic; single dwelling	421 W. Courtland	Park Ridge	IHPA Sprague Survey
LS-392	Residence	Domestic; single dwelling	708 W. Courtland	Park Ridge	IHPA Sprague Survey
LS-409	Residence	Domestic; single dwelling	211 Avondale	Park Ridge	IHPA Sprague Survey
LS-410	Residence	Domestic; single dwelling	225 Avondale	Park Ridge	IHPA Sprague Survey
LS-411	Residence	Domestic; single dwelling	228 Avondale	Park Ridge	IHPA Sprague Survey
LS-412	Residence	Domestic; single dwelling	234 Avondale	Park Ridge	IHPA Sprague Survey
LS-413	Residence	Domestic; single dwelling	244 Avondale	Park Ridge	IHPA Sprague Survey
LS-418	Residence	Domestic; single dwelling	908 W. Courtland	Park Ridge	IHPA Sprague Survey
LS-429	Residence	Domestic; single dwelling	413 S. Fairview	Park Ridge	IHPA Sprague Survey
LS-430	Residence	Domestic; single dwelling	521 S. Fairview	Park Ridge	IHPA Sprague Survey
LS-431	Residence	Domestic; single dwelling	602 S. Fairview	Park Ridge	IHPA Sprague Survey
LS-440	Residence	Domestic; single dwelling	400 S. Fairview	Park Ridge	IHPA Sprague Survey
LS-441	Residence	Domestic; single dwelling	823 S. Crescent	Park Ridge	IHPA Sprague Survey
LS-443	Residence	Domestic; single dwelling	1000 Crescent	Park Ridge	IHPA Sprague Survey
LS-444	Residence	Domestic; single dwelling	1433 Crescent	Park Ridge	IHPA Sprague Survey
LS-445	Residence	Domestic; single dwelling	321 Crescent	Park Ridge	IHPA Sprague Survey
LS-446	Residence	Domestic; single dwelling	333 Crescent	Park Ridge	IHPA Sprague Survey
LS-448	Residence	Domestic; single dwelling	325 S. Crescent	Park Ridge	IHPA Sprague Survey
LS-449	Residence	Domestic; single dwelling	413 S. Crescent	Park Ridge	IHPA Sprague Survey

**TABLE L-6  
LOCALLY IMPORTANT HISTORIC SITES**

Map-ID	Name	Function	Address	City	Source
LS-450	Residence	Domestic; single dwelling	505 S. Crescent	Park Ridge	IHPA Sprague Survey
LS-452	Residence	Domestic; single dwelling	601 S. Crescent	Park Ridge	IHPA Sprague Survey
LS-453	Residence	Domestic; single dwelling	925 S. Crescent	Park Ridge	IHPA Sprague Survey
LS-455	Residence	Domestic; single dwelling	1100 N. Cumberland	Park Ridge	IHPA Sprague Survey
LS-456	Residence	Domestic; single dwelling	315 S. Cumberland	Park Ridge	IHPA Sprague Survey
LS-457	Residence	Domestic; single dwelling	401 S. Cumberland	Park Ridge	IHPA Sprague Survey
LS-460	Residence	Domestic; single dwelling	231 Della Plaine	Park Ridge	IHPA Sprague Survey
LS-461	Commercial	Commerce/Trade	N. side Devon, Prospect to Talcott	Park Ridge	IHPA Sprague Survey
LS-464	Residence	Domestic; single dwelling	506 S. Crescent	Park Ridge	IHPA Sprague Survey
LS-480	21 Siemer's Home	Domestic; single dwelling	4262 N. Ruby St.	Schiller Park	Local Municipal Landmark
LS-481	Alexander Robinson House	Domestic; single dwelling	4301 Cullum St.	Schiller Park	Local Municipal Landmark
LS-482	20 Corner Store	Domestic; single dwelling	4851 Michigan	Schiller Park	Local Municipal Landmark
LS-486	Residence	Domestic; single dwelling	174 Harvey	Wood Dale	IHPA Sprague Survey
LS-487	Residence	Domestic; single dwelling	262 N. Hemlock	Wood Dale	IHPA Sprague Survey
LS-502	Private Home (1918)	Domestic	138 S. Mason	Bensenville	Local Municipal Landmark
LS-503	Private Home (1911)	Domestic	141 S. Mason	Bensenville	Local Municipal Landmark
LS-504	Private Home (1906)	Domestic	145 S. Mason	Bensenville	Local Municipal Landmark
LS-505	Private Home (1903)	Domestic	146 S. Mason	Bensenville	Local Municipal Landmark
LS-506	Private Home (1919)	Domestic	158 S. Mason	Bensenville	Local Municipal Landmark
LS-507	Private Home (1924)	Domestic	166 S. Mason	Bensenville	Local Municipal Landmark
LS-508	Private Home (1925)	Domestic	169 S. Mason	Bensenville	Local Municipal Landmark
LS-509	Private Home (1921)	Domestic	172 S. Mason	Bensenville	Local Municipal Landmark

**TABLE L-6  
LOCALLY IMPORTANT HISTORIC SITES**

Map-ID	Name	Function	Address	City	Source
LS-510	Private Home (1900)	Domestic	173 S. Mason	Bensenville	Local Municipal Landmark
LS-511	Private Home (1920)	Domestic	175 S. Mason	Bensenville	Local Municipal Landmark
LS-512	Private Home (1921)	Domestic	180 S. Mason	Bensenville	Local Municipal Landmark
LS-513	Private Home (1923)	Domestic	196 S. Mason	Bensenville	Local Municipal Landmark
LS-514	Private Home (1925)	Domestic	201 S. Mason	Bensenville	Local Municipal Landmark
LS-515	Private Home (1919)	Domestic	301 W. Green	Bensenville	Local Municipal Landmark
LS-516	Private Home (1923)	Domestic	309 W. Green	Bensenville	Local Municipal Landmark
LS-517	Private Home (1923)	Domestic	313 W. Green	Bensenville	Local Municipal Landmark
LS-518	Private Home (1919)	Domestic	317 W. Green	Bensenville	Local Municipal Landmark
LS-519	Private Home (1907)	Domestic	507 W. Green	Bensenville	Local Municipal Landmark
LS-520	Private Home (1872)	Domestic	517 W. Green	Bensenville	Local Municipal Landmark
LS-521	Private Home (1922)	Domestic	143 S. Addison	Bensenville	Local Municipal Landmark
LS-522	Private Home (1922)	Domestic	150 S. Addison	Bensenville	Local Municipal Landmark
LS-523	Private Home (1924)	Domestic	168 S. Addison	Bensenville	Local Municipal Landmark
LS-524	Private Home (1922)	Domestic	169 S. Addison	Bensenville	Local Municipal Landmark
LS-525	Private Home (1925)	Domestic	201 S. Addison	Bensenville	Local Municipal Landmark
LS-526	Private Home (1868)	Domestic	437 S. Addison	Bensenville	Local Municipal Landmark
LS-527	Private Home (1903)	Domestic	180 S. May	Bensenville	Local Municipal Landmark
LS-528	Private Home (1923)	Domestic	184 S. May	Bensenville	Local Municipal Landmark
LS-529	Private Home (1918)	Domestic	185 S. May	Bensenville	Local Municipal Landmark
LS-530	Private Home (1900)	Domestic	145 S. Center	Bensenville	Local Municipal Landmark
LS-531	Private Home (1925)	Domestic	155 S. Center	Bensenville	Local Municipal Landmark

**TABLE L-6  
LOCALLY IMPORTANT HISTORIC SITES**

Map-ID	Name	Function	Address	City	Source
LS-532	Private Home (1894)	Domestic	156 S. Center	Bensenville	Local Municipal Landmark
LS-533	Private Home (1900)	Domestic	160 S. Center	Bensenville	Local Municipal Landmark
LS-534	Private Home (1903)	Domestic	168 S. Center	Bensenville	Local Municipal Landmark
LS-535	Private Home (1919)	Domestic	181 S. Center	Bensenville	Local Municipal Landmark
LS-536	Private Home (1922)	Domestic	202 S. Center	Bensenville	Local Municipal Landmark
LS-537	Private Home (1919)	Domestic	206 S. Center	Bensenville	Local Municipal Landmark
LS-538	Private Home (1925)	Domestic	240 S. Center	Bensenville	Local Municipal Landmark
LS-539	Private Home (1925)	Domestic	244 S. Center	Bensenville	Local Municipal Landmark
LS-540	Private Home (1866)	Domestic	4N030 Church Road	Bensenville	Local Municipal Landmark
LS-541	Private Home (1904)	Domestic	14 S. York	Bensenville	Local Municipal Landmark
LS-542	Private Home (1907)	Domestic	158 S. York	Bensenville	Local Municipal Landmark
LS-544	Private Home (1905)	Domestic	181 S. York	Bensenville	Local Municipal Landmark
LS-545	Private Home (1912)	Domestic	192 S. York	Bensenville	Local Municipal Landmark
LS-546	Private Home (1912)	Domestic	217 S. York	Bensenville	Local Municipal Landmark
LS-547	Private Home (1870)	Domestic	120 E. Lincoln	Bensenville	Local Municipal Landmark
LS-548	Private Home (1910)	Domestic	131 E. Lincoln	Bensenville	Local Municipal Landmark
LS-549	Private Home (1924)	Domestic	176 S. Walnut	Bensenville	Local Municipal Landmark
LS-550	Private Home (1922)	Domestic	188 S. Walnut	Bensenville	Local Municipal Landmark
LS-551	Private Home (1924)	Domestic	196 S. Walnut	Bensenville	Local Municipal Landmark
LS-552	Private Home (1920)	Domestic	9 E. Pine (runs east of York Rd)	Bensenville	Local Municipal Landmark
LS-553	Private Home (1894)	Domestic	110 E. Pine (runs east of York Rd)	Bensenville	Local Municipal Landmark

**TABLE L-6  
LOCALLY IMPORTANT HISTORIC SITES**

Map-ID	Name	Function	Address	City	Source
LSS-1	Geodesic Dome	Residence	225 Garden Avenue	Bensenville	Karaganis, White, and Magel, Ltd.
LSS-2	Elk Grove Cemetery	Cemetery		Elk Grove	Karaganis, White, and Magel, Ltd.
LSS-3	Elk Grove Park District Farmhouse Museum	Museum		Elk Grove	Karaganis, White, and Magel, Ltd.
LSS-4	Historic Tonne House	Local Historic Property		Elk Grove	Karaganis, White, and Magel, Ltd.
LSS-5	Original Farmhouse - 1	Local Historic Property	North side of Cosman at Cosman	Elk Grove	Karaganis, White, and Magel, Ltd.
LSS-6	Original Farm House - 2	Local Historic Property	East side of Arlington Heights Road at Edgewater	Elk Grove	Karaganis, White, and Magel, Ltd.
<b>SITES WHERE STRUCTURES HAVE BEEN RAISED OR COULD NOT BE LOCATED BASED ON SOURCE DOCUMENT</b>					
LS-56 (c)	Residence	Domestic; single dwelling; commerce/trade	17 N. Center	Bensenville	IHPA Sprague Survey
LS-60 (a)	Residence	Domestic; single dwelling	437 S. Addison	Bensenville	IHPA Sprague Survey
LS-61 (a)	Residence	Domestic; single dwelling	240 S. Center	Bensenville	IHPA Sprague Survey
LS-64 (c)	Residence	Domestic; single dwelling	28 S. Center	Bensenville	IHPA Sprague Survey
LS-65	Senne House	Domestic; single dwelling	14 S. York Rd.	Bensenville	Local Municipal Landmark
LS-67		Commerce/Trade	9 S. Center	Bensenville	IHPA Sprague Survey
LS-68	Deer Park	Recreation & Culture; monument marker	Church Rd, S. of Wood Ave.	Bensenville	IHPA DuPage County Landmark Survey
LS-70 (a)	Bensenville School	Education; school	N. side Green, E. of May	Bensenville	IHPA Sprague Survey
LS-78 (a)	Peace Church 1	Church	192 S. Center	Bensenville	Local Municipal Landmark
LS-80 (a)	Varble Park	NFP; Recreation & Culture; houses Frazen Mill memorial, Korthauer log house	900 W. Wood Street	Bensenville	Local Municipal Landmark; DuPage County Cultural & Historical Inventory
LS-82 (a)	Milwaukee Road Roundhouse	Razed?	Park & Irving Park Road	Bensenville	Local Municipal Landmark
LS-84 (a)	August Schwerdfeger's Law	Law Offices	145 W. Green	Bensenville	Local Municipal Landmark

**TABLE L-6  
LOCALLY IMPORTANT HISTORIC SITES**

Map-ID	Name	Function	Address	City	Source
Office					
LS-85 (a)	F. Chessman Farmstead	Residential - multiple structures?	Thorndale Rd.	Bensenville	IHPA Cultural Resource Management Survey
LS-89 (a)	Rouse Site	Razed?	Thorndale Rd.	Bensenville	IHPA Cultural Resource Management Survey
LS-92 (a)	Franzen's Garden Orchard Subdivision	Domestics	East of York, north of Irving Park	Bensenville	IHPA Cultural Resource Management Survey
LS-485 (a)	Chicago and Elgin Road Bridge	Transportation; Bridge	Irving Park Rd. & Salt Creek	Wood Dale	Local Municipal Landmark
LS-543 (b)	Private Home (1903)	Domestic	165 S. York	Bensenville	Local Municipal Landmark
Notes:					
(a) Delete record/razed					
(b) Delete record/double address (LS 65 = LS 541); (LS 543 = LS 75); (LS 68 = LS 91); (LS 67 = LS 58)					
(c) Wrong Address					

## Churches

Two churches (St. John's United Church of Christ and Peace Church) were identified with local historical importance. Neither of these churches would be directly affected through acquisition by the proposed Build Alternatives. Constructive use considerations would be focused on changes in aircraft noise exposure. Churches are compatible with aircraft noise up to 65 DNL unless insulated. Noise levels at Peace Church would be less than 65 DNL with any of the alternatives. Noise levels at St. John's United Church of Christ would be greater than 65 DNL with or without the proposed Build Alternatives. With any of the Build Alternatives, a significant increase in aircraft noise would occur (a 1.5 DNL increase over the No Action). However, the existing exposure has apparently not adversely affected this site's features, or the attributes that contribute to its importance or enjoyment. Therefore, a project-related impact would not be expected with any of the Build Alternatives, if selected.

## Schools

Schools are compatible with aircraft noise up to 65 DNL unless insulated. Tioga School (LS-79) and Chippewa Schools (LS-88) were insulated during the 1990s by the City of Chicago due to past and existing aircraft noise exposure. With the insulation, these uses are considered compatible with aircraft noise. Therefore, the Build Alternatives would not directly or indirectly affect these properties and no Section 4(f) impacts would occur to these sites.

## Museums

In general, museums are compatible with aircraft noise up to 65 DNL unless insulated. Bensenville's Veteran's Park railroad museum (LS-66) is addressed by this evaluation as part of the recreational resource consideration containing a potential noise sensitive use. Korthauer Log House (LS-86) was identified as locally important historic site as a residence of an early settler of the area. The Elk Grove Park District Farmhouse Museum (LSS-3) was identified as the second oldest farmhouse in Elk Grove and dates to 1856, and the museum contains many artifacts from that same period. Noise levels at this site with all alternatives would be less than 65 DNL, and thus would not adversely impact this resource.

## Memorial

Franzen Mill Memorial (LS-91) consists of a mill stone and plaque that observes the past presence of the Franzen Mill. The Franzen Mill was a linseed oil mill which was built by John Henry Franzsen in 1847. The mill ceased operation in 1870 and the memorial was established in front of the Bensenville Public Library in 1973. Such uses are compatible with noise levels up to 75 DNL. A constructive use impact would not occur at this site since noise levels with all alternatives are less than 70 DNL.

### Commercial/Retail Buildings

Each of the commercial/retail buildings (Theater/Stores LS-58, Pease Church Manse Professional Center LS-63, Janker's Building LS-90, and three unnamed commercial properties: LS-249, LS-289, LS-461) would not be directly affected by the proposed Build Alternatives. Constructive use considerations focused on changes in aircraft noise exposure. Commercial uses are compatible with aircraft noise up to 70 DNL. Since these sites would be exposed to noise levels less than 70 DNL, no Section 4(f) impacts would occur.

### Cemeteries

Cemeteries are compatible with aircraft noise up to 85 DNL. In addition to St. Johannes and Rest Haven, which are discussed further in **Section L.3**, one additional locally important historic cemetery was identified within the project area. Elk Grove Cemetery is a privately owned cemetery located in unincorporated Elk Grove Township, with grave markers that date to the 1840s. Elk Grove Cemetery would not be directly or indirectly impacted by any of the Build Alternatives, if selected.

### Residential

Various sources identified 119 residences as locally important from a historic perspective. None of these residential properties would be directly affected by the proposed Build Alternatives. Residential properties are compatible with aircraft noise up to 65 DNL. However, incompatible noise levels would not represent a constructive use unless these noise levels would substantially impair the activities, features, or attributes of the resource. For example, where proposed noise levels exceed the 65 DNL and greater threshold, potential mitigation through sound insulation may be implemented. It is the sound insulation methods associated with potential mitigation that could alter the specific structures of the locally important historic sites that make them historic. As a result, a draft programmatic agreement is being prepared to address the methods to be used to sound insulate locally important historic sites. The methods for sound insulating historic resources are included in Section L.3 of this Section 4(f) Evaluation. Through the compliance with the Secretary of Interior's *Standards for the Treatment of Historic Buildings* (U.S. Department of Interior, National Park Service, 1995), as well as FAA's sound insulation guidance, these properties would be compatible. Therefore, no constructive use impacts on local residential sites of historical importance are anticipated.

**TABLE L-7  
NOISE COMPATIBILITY OF SECTION 4(f) AND SECTION 6(f) LANDS-ALL  
ALTERNATIVES**

Map ID	Description	Land Use					
		Compatibility Guideline by Use (DNL)	Existing Noise Level	Build Out + 5 No Action Alternative A	Build Out + 5 Alternative C	Build Out + 5 Alternative D	Build Out + 5 Alternative G
<b>Historic Properties</b>							
HP-1	Churchville School	65	53.8	54.3	57.2	54.7	54.8
HP-2	Norwood Park Historical District	65	55.9	58.2	64.0	64.1	64.2
HP-3	Noble-Seymour-Crippen House	65	57.8	60.0	64.6	64.6	64.7
HP-4*	Green Street School (Commercial Property)	70	58.5	61.3	65.6	62.8	62.9
HP-5	Gas Service Station (vacant)	NA	58.4	60.2			
HP-6*	Rest Haven Cemetery	85	65.6	68.5			
HP-7*	St. Johannes Cemetery	85	73.5	74.8			
HP-8*	United Terminal 1 and CTA Transfer Station	NA	65.3	64.9	66.1	66.5	66.1
HP-9*	Old Control Tower	NA	65.3	64.8	65.9	66.2	65.8
HP-10*	Schwerdtfeger Farmstead (vacant)	NA	62.7	65.7			
HP-11	Wingert House	65	55.1	54.6	59.5	60.0	59.5
HPN-24	Old Edgebrook District	65	53.5	55.2	60.7	60.7	60.8
HPN-4	Chicago & NW Depot	75	54.6	56.0	61.2	61.4	61.4
<b>Parks</b>							
FP-1	Elk Grove Forest Preserve (Salt Creek West)	75	NA	55.4	55.7	55.5	55.3
FP-2	Elk Grove Forest Preserve (Salt Creek East)	75	NA	56.5	56.9	57.0	56.6
FP-3	Silver Creek (DuPage County Forest Preserve)	75	NA	69.6			
FP-4	Ned Brown Forest Preserve	75	NA	56.8	56.9	57.0	63.7
P-1	Bretman Park	75	59.3	62.3			
P-2	DiOrio Park	75	57.3	59.7	64.0	60.9	60.9
P-3	Kremple's Park	75	NA	57.7	57.6	55.9	56.1
P-4	Lions Park	75	57.9	60.6	65.0	62.1	62.2
P-5	Pines Park	75	55.4	56.8	60.5	57.5	57.5
P-6	Poplar Park	75	63.9	64.5	69.2	69.5	69.4
P-7	Rose Park	75	NA	57.4	57.0	55.2	55.5
P-8	Schuster Park (6(f) Property)	75	59.9	63.1			
P-9	Sunrise Park	75	58.1	59.7	61.2	59.4	59.6
P-10	Sunset Park	75	58.1	61.0	65.1	63.1	63.1
P-11	Varble Park/Water Park & Golf Waters Grove	75	56.9	58.9	62.4	61.5	61.5
P-12	Locomotive Museum at Veteran's Park	65	59.8	62.3	66.7	66.4	66.4

**TABLE L-7  
NOISE COMPATIBILITY OF SECTION 4(f) AND SECTION 6(f) LANDS-ALL  
ALTERNATIVES**

Map ID	Description	Land Use					
		Compatibility Guideline by Use (DNL)	Existing Noise Level	Build Out + 5 No Action Alternative A	Build Out + 5 Alternative C	Build Out + 5 Alternative D	Build Out + 5 Alternative G
P-13	Woodcrest Park	75	53.9	56.3	59.9	60.2	60.2
P-14	Woodside Park	75	55.0	57.1	60.1	59.8	59.8
P-15	Grandparents Park	75	61.8	61.3	63.9	64.0	64.0
P-16	Mulberry Point Park	75	56.7	59.1	65.0	65.0	65.1
P-17	Myrtle Point Park	75	54.7	55.8	61.1	61.2	61.3
P-18	Norwood Circle Park	75	56.1	58.3	64.3	64.4	64.5
P-19	Norwood Park	75	57.2	59.6	64.7	64.7	64.8
P-20	Oriole Park	75	59.7	60.5	64.7	64.8	64.8
P-21	Summerdale Park	75	59.4	59.2	61.1	61.2	61.3
P-27	Seminole Park	75	60.1	58.7	59.9	60.6	59.5
P-29	Salt Creek Park	75	55.0	56.1	60.4	60.6	60.6
P-30	Andrews Park	75	58.0	57.5	57.5	57.4	58.0
P-31	Appleseed Park	75	56.8	57.0	56.9	56.8	56.8
P-32	Community Athletic Fields	75	58.3	59.7	60.0	59.9	58.3
P-33	Audubon Park	75	59.1	57.7	58.7	59.0	58.5
P-34	Bartrum Park	75	59.7	58.0	58.5	58.5	58.3
P-35	Burbank Park	75	59.5	58.4	59.4	60.0	59.6
P-36	Fairchild Park	75	60.5	59.2	60.2	60.7	60.3
P-37	Lions Park (Rainbow Falls	75	57.7	56.6	57.1	57.2	56.8
P-38	Muir Park	75	61.1	60.2	60.7	60.8	60.8
P-39	Olmstead Park	75	58.6	57.6	59.6	60.5	59.6
P-40	Osborn Park	75	NA	62.2	57.3	57.1	57.1
P-41	Sanders Park	75	NA	58.5	58.6	58.5	58.4
P-42	Udall Park	75	NA	63.9	59.6	59.3	59.2
P-54	Benson Park	75	55.6	55.3	57.0	56.8	56.9
P-56	Country Club Park	75	58.7	58.0	59.7	59.7	59.7
P-57	Franzen Park	75	56.9	56.2	58.1	58.2	58.2
P-59	Schiller Park	75	63.4	62.8	64.8	64.8	64.9
P-62	Brickton Park	75	58.2	59.5	66.1	66.3	66.3
P-63	Centennial Park	75	57.5	54.7	57.9	58.6	57.7
P-64	Jaycee Park	75	56.4	57.5	63.6	63.8	63.8
P-65	Southwest Park	75	58.5	59.5	65.2	65.5	65.5
P-66	Fairview Park	75	68.3	67.1	67.1	68.1	67.4
	Kennedy Park/ Memorial						
P-67	Pool	75	59.5	62.5	63.0	60.2	59.7
P-68	North Village Park	75	69.3	68.3	70.9	71.2	70.8
	Wm. M. Dooley Memorial						
P-70	Park	75	64.8	66.3	67.5	67.4	67.0
P-72	Central Park	75	66.9	66.5	69.4	69.3	69.4
P-73	Wood Dale Community Park	75	61.8	61.4	63.6	63.6	63.6
P-74	Lionwood Park	75	59.1	59.6	63.7	63.9	63.9

**TABLE L-7  
NOISE COMPATIBILITY OF SECTION 4(f) AND SECTION 6(f) LANDS-ALL  
ALTERNATIVES**

Map ID	Description	Land Use					
		Compatibility Guideline by Use (DNL)	Existing Noise Level	Build Out + 5 No Action Alternative A	Build Out + 5 Alternative C	Build Out + 5 Alternative D	Build Out + 5 Alternative G
P-75	Veteran's Memorial Park	75	61.5	61.6	65.0	65.2	65.2
P-76	White Oak Park	75	55.3	57.0	61.9	62.1	62.0
P-77	Wood Dale Water Park	75	62.5	62.6	66.0	66.2	66.1
PX-25	Brooks Park	75	53.8	51.2	55.9	56.6	55.9
PX-27	Athletic Fields	75	54.8	52.5	61.3	61.8	61.5
PX-29	Gladstone Park	75	56.9	57.6	60.6	60.6	60.8
PX-32	Indian Road Park	75	53.5	54.9	59.6	59.8	59.7
PX-34	Monument Park	75	54.9	52.7	61.3	61.8	61.4
PX-39	Olympia Park	75	54.9	53.1	59.8	60.3	59.8
PX-41	Pleasant Point Park	75	53.9	53.0	58.6	59.1	58.6
PX-43	Rosedale Park	75	55.1	57.3	63.0	63.1	63.2
	Addison Community Park						
PX-73	East	75	52.8	54.7	58.8	59.2	59.2
PX-79	Burbank Park	75	59.5	58.3	59.4	60.0	59.6
PX-88	Jay Cee Park	75	58.2	57.3	59.1	60.0	59.1
PX-97	Morton Park	75	59.1	58.0	60.6	61.8	60.7
PX-103	Roosevelt Park	75	58.2	57.2	58.4	59.0	58.6
PX-167	Cumberland Prairie Park	75	56.1	55.2	57.5	58.0	57.4
PX-168	Hinckley Park	75	55.9	53.6	55.2	55.5	54.7
PX-192	South Park	75	55.7	55.6	59.9	60.4	59.7
PX-193	Terrace Park	75	NA	64.6	63.3	63.1	63.1
PX-194	Redmond Park	75	NA	60.2	58.1	57.3	57.7
	Veteran's Park West -						
PX-195	Bensenville City Park	75	NA	62.1	66.6	66.5	66.5
	Bensenville Library Garden						
PX-196	of Knowledge	75	NA	59.7	63.3	62.1	62.1
PX-197	Library District Park	75	NA	59.7	63.3	62.1	62.1
PX-198	Palm-Breiter Park	75	NA	58.6	62.3	60.2	60.2
PX-199	Veterans Memorial Park	75	NA	56.8	59.4	60.7	59.7
PX-200	Hanson Park	75	NA	55.0	57.3	57.8	57.5
PX-201	Village Green	75	NA	56.4	59.1	60.3	59.4
	Elk Grove Park District (Salt						
PX-202	Creek Placid Ave)	75	NA	58.5	59.9	60.7	60.0
PX-203	Debra Park	75	NA	53.7	56.9	57.9	57.2
PX-204	Johnson Park	75	NA	54.6	57.6	58.4	57.8
	Majewski Metro Park in Des						
PX-205	Plaines	75	NA	63.8	58.0	59.9	59.8
PX-206	MWRD Preservation Area	75	NA	62.4	60.2	59.6	59.6
PX-207	Salt Creek Golf Club	75	NA	58.8	61.6	61.9	61.9
PX-208	SBL Park	75	NA	57.8	59.3	59.5	59.5

**TABLE L-7  
NOISE COMPATIBILITY OF SECTION 4(f) AND SECTION 6(f) LANDS-ALL  
ALTERNATIVES**

Map ID	Description	Land Use					
		Compatibility Guideline by Use (DNL)	Existing Noise Level	Build Out + 5 No Action Alternative A	Build Out + 5 Alternative C	Build Out + 5 Alternative D	Build Out + 5 Alternative G
PX-209	Marshall Field	75	NA	56.2	58.0	58.9	58.1
PX-210	Salt Creek Field	75	NA	57.7	60.3	61.5	60.5
PX-211	Woodland Meadows	75	NA	54.1	57.1	58.1	57.3
PX-212	Huntington Park (Chase)	75	NA	55.0	57.8	58.6	58.0
PX-213	Ridge Park (Field)	75	NA	57.3	58.0	58.0	57.8
PX-214	Hattendorf Park (Al Hattendorf Center)	75	NA	57.9	59.5	60.3	59.5
PX-215	Legends Golf Course	75	NA	64.9	60.3	61.4	60.8
PP-1	LGK Pocket Park (Under Construction)	75	NA	68.4	69.9	72.1	70.5
PP-2	Pocket Park #2 (Under Construction)	75	NA	67.3	66.7	66.4	66.4
PP-3	Pocket Park #3 (Under Construction)	75	NA	66.4	65.1	64.8	64.7
PP-4	Pocket Park 4 (Under Construction)	75	NA	66.1	65.6	65.4	65.2
PP-5	Pocket Park #5 (Under Construction)	75	NA	66.1	65.6	65.4	65.2
PP-6	Pocket Park #6 (Future)	75	NA	66.1	65.6	65.4	65.2
PP-7	Pocket Park #7 (Construction)	75	NA	66.1	65.6	65.4	65.2
PP-8	Pocket Park #8 (Future)	75	NA	65.0	63.3	63.0	62.9
PP-9	Pocket Park #9 (Existing)	75	NA	64.7	64.1	64.0	63.7
PP-10	Pocket Park #10 (Future)	75	NA	64.7	64.1	64.0	63.7
PP-11	Pocket Park #11 (Future)	75	NA	64.3	66.1	66.9	66.0
PP-12	Pocket Park #12 (Existing)	75	NA	64.3	66.1	66.9	66.0
PP-13	Pocket Park #13 (Future)	75	NA	61.3	61.2	61.2	61.1
PP-14	Pocket Park #14 (Future)	75	NA	60.8	63.0	64.1	63.0
PP-15	Pocket Park #15 (Existing)	75	NA	63.9	59.6	59.3	59.2
PP-16	Pocket Park #16 (Future)	75	NA	66.8	60.9	60.4	60.4
PP-17	Pocket Park #17 (Future)	75	NA	68.0	61.8	61.3	61.2
PP-18	Pocket Park #18 (Existing)	75	NA	68.0	61.8	61.3	61.2
PP-19	Pocket Park #19 (Future)	75	NA	68.0	61.8	61.3	61.2
PP-20	Pocket Park #20 (Future)	75	NA	63.7	56.6	56.4	56.4
<b>Locally Important Historic Sites</b>							
LS-57	Peace Church 2	65	57.9	60.5	64.8	61.9	62.0
LS-58	Theatre/stores	70	58.9	61.9	66.7	64.1	64.1
LS-59	Residence	65	58.1	60.8	65.2	62.3	62.4
LS-62	St. John's United Church of	65	66.6	66.4	69.1	69.0	69.0

**TABLE L-7  
NOISE COMPATIBILITY OF SECTION 4(f) AND SECTION 6(f) LANDS-ALL  
ALTERNATIVES**

Map ID	Description	Land Use Compatibility					
		Guideline by Use (DNL)	Existing Noise Level	Build Out + 5 No Action Alternative A	Build Out + 5 Alternative C	Build Out + 5 Alternative D	Build Out + 5 Alternative G
	Christ						
LS-63	Peace Church Manse Prof Bldg.	70	58.6	61.5	66.1	63.4	63.5
LS-66	Railroad Monument/ Veteran's Park	75	59.2	61.8	66.1	65.6	65.6
LS-73	Residence	65	58.5	60.8	64.0	61.1	61.2
LS-75	Residence	65	58.1	60.8	65.1	62.3	62.3
LS-76	Residence	65	58.0	60.7	64.9	62.1	62.1
LS-79	Tioga School	65	57.1	59.2	63.1	60.1	60.1
LS-83	A.G. Chessman	65	66.1	66.1	69.7	69.6	69.6
LS-86	Korthauer Log House	65	58.2	61.1	65.1	63.8	63.8
LS-88	Chippewa School (sound insulated)	65	59.0	62.0	66.8	64.3	64.3
LS-90	Janker's Building	70	57.6	60.0	64.3	61.3	61.3
LS-91	Franzen's Mill Memorial	75	60.5	62.5	67.4	67.5	67.6
LS-249	Commercial	70	58.3	61.0	64.8	62.2	62.3
LS-251	Durocraft Homes	65	65.1	65.0	61.4	61.4	61.3
LS-289	Commercial	70	56.6	57.5	62.8	63.1	63.0
LS-320	Hodges House	65	55.5	54.4	59.4	59.9	59.5
LS-333	Residence	65	56.2	55.6	59.7	60.1	59.7
LS-335	Residence	65	55.4	54.2	59.6	60.1	59.6
LS-336	Residence	65	55.3	54.1	60.1	60.6	60.2
LS-340	Residence	65	55.3	54.0	61.1	61.7	61.3
LS-343	Residence	65	55.4	55.4	59.7	60.3	59.7
LS-357	Residence	65	56.6	57.5	62.9	63.2	63.1
LS-359	Residence	65	56.1	55.4	59.7	60.2	59.7
LS-361	Residence	65	56.1	55.2	61.1	61.6	61.2
LS-362	Residence	65	56.1	55.1	62.1	62.6	62.3
LS-363	Residence	65	56.2	54.9	63.1	63.6	63.3
LS-364	Residence	65	56.1	54.8	63.1	63.6	63.3
LS-368	Residence	65	55.4	55.4	59.8	60.3	59.7
LS-369	Residence	65	55.4	55.4	59.8	60.3	59.7
LS-370	Residence	65	56.1	55.2	61.1	61.6	61.2
LS-371	Residence	65	55.2	53.5	62.2	62.7	62.4
LS-378	Residence	65	56.9	56.1	63.6	64.1	63.8
LS-379	Residence	65	56.4	55.6	61.1	61.6	61.3
LS-381	Residence	65	55.8	54.5	61.8	62.3	61.9
LS-382	Residence	65	55.2	53.5	62.2	62.7	62.4
LS-384	Residence	65	55.8	55.0	59.3	59.8	59.3

**TABLE L-7  
NOISE COMPATIBILITY OF SECTION 4(f) AND SECTION 6(f) LANDS-ALL  
ALTERNATIVES**

Map ID	Description	Land Use					
		Compatibility Guideline by Use (DNL)	Existing Noise Level	Build Out + 5 No Action Alternative A	Build Out + 5 Alternative C	Build Out + 5 Alternative D	Build Out + 5 Alternative G
LS-385	Residence	65	56.0	56.7	61.6	62.0	61.7
LS-386	Residence	65	56.1	56.8	61.7	62.1	61.8
LS-388	Residence	65	55.9	55.0	59.6	60.1	59.6
LS-389	Residence	65	55.4	55.6	60.2	60.7	60.3
LS-390	Residence	65	55.9	54.8	61.1	61.6	61.3
LS-391	Residence	65	55.9	54.8	61.2	61.7	61.4
LS-392	Residence	65	55.9	54.5	63.0	63.4	63.1
LS-409	Residence	65	55.1	53.5	60.5	61.0	60.6
LS-410	Residence	65	55.1	53.5	60.5	61.0	60.6
LS-411	Residence	65	55.1	53.5	60.5	61.0	60.6
LS-412	Residence	65	55.1	53.5	60.5	61.0	60.6
LS-413	Residence	65	55.1	53.5	60.5	61.0	60.6
LS-418	Residence	65	55.7	54.7	61.0	61.6	61.1
LS-429	Residence	65	56.4	55.6	61.3	61.8	61.4
LS-430	Residence	65	NA	55.2	61.0	61.5	61.1
LS-431	Residence	65	56.4	55.3	63.2	63.7	63.5
LS-440	Residence	65	56.4	55.6	61.1	61.5	61.2
LS-441	Residence	65	55.7	54.3	62.1	62.6	62.2
LS-443	Residence	65	56.5	55.4	59.7	60.2	59.7
LS-444	Residence	65	57.2	54.9	60.2	60.8	60.2
LS-445	Residence	65	55.8	54.8	59.9	60.4	60.0
LS-446	Residence	65	55.8	54.8	60.0	60.5	60.1
LS-448	Residence	65	55.8	54.8	59.9	60.4	60.0
LS-449	Residence	65	55.5	54.3	60.8	61.3	60.9
LS-450	Residence	65	55.5	54.2	61.6	62.1	61.8
LS-452	Residence	65	55.6	54.2	62.6	63.1	62.8
LS-453	Residence	65	55.6	54.5	61.2	61.7	61.2
LS-455	Residence	65	55.9	55.7	59.9	60.5	59.8
LS-456	Residence	65	56.4	55.7	60.0	60.5	60.1
LS-457	Residence	65	56.6	55.9	62.5	63.0	62.7
LS-460	Residence	65	55.2	53.5	62.0	62.5	62.2
LS-461	Commercial	70	55.5	55.4	59.7	60.2	59.6
LS-464	Residence	65	55.5	54.2	61.9	62.4	62.1
LS-480	21 Siemer's Home	65	72.3	71.5	70.5	71.1	70.7
LS-481	Alexander Robinson Home	65	61.1	61.9	64.1	62.2	61.4
LS-482	20 Corner Store	65	71.9	71.0	69.9	70.4	70.0
LS-486	Residence	65	56.3	56.9	60.7	60.8	60.8
LS-487	Residence	65	58.8	60.1	65.5	65.7	65.7
LS-502	Private Home (1918)	65	60.4	63.2	67.6	67.1	67.1

**TABLE L-7  
NOISE COMPATIBILITY OF SECTION 4(f) AND SECTION 6(f) LANDS-ALL  
ALTERNATIVES**

Map ID	Description	Land Use Compatibility Guideline by Use (DNL)	Existing Noise Level	Build Out + 5			
				No Action Alternative A	Build Out + 5 Alternative C	Build Out + 5 Alternative D	Build Out + 5 Alternative G
LS-503	Private Home (1911)	65	60.6	63.3	67.8	67.4	67.5
LS-504	Private Home (1906)	65	60.4	63.1	67.6	67.1	67.1
LS-505	Private Home (1903)	65	60.3	63.1	67.5	66.9	66.9
LS-506	Private Home (1919)	65	60.2	63.1	67.4	66.7	66.8
LS-507	Private Home (1924)	65	60.1	63.0	67.4	66.6	66.6
LS-508	Private Home (1925)	65	60.2	63.0	67.4	66.8	66.8
LS-509	Private Home (1921)	65	60.1	62.9	67.3	66.5	66.5
LS-510	Private Home (1900)	65	60.1	62.9	67.3	66.5	66.6
LS-511	Private Home (1920)	65	60.0	62.8	67.2	66.4	66.4
LS-512	Private Home (1921)	65	60.0	62.9	67.2	66.3	66.4
LS-513	Private Home (1923)	65	59.9	62.8	67.2	66.2	66.3
LS-514	Private Home (1925)	65	57.7	60.3	64.7	61.7	61.8
LS-515	Private Home (1919)	65	58.7	61.7	66.2	64.0	64.0
LS-516	Private Home (1923)	65	58.7	61.7	66.2	64.0	64.1
LS-517	Private Home (1923)	65	58.8	61.7	66.2	64.0	64.1
LS-518	Private Home (1919)	65	58.8	61.7	66.2	64.0	64.1
LS-519	Private Home (1907)	65	58.7	61.7	66.3	63.9	64.0
LS-520	Private Home (1872)	65	58.7	61.6	66.2	63.8	63.9
LS-521	Private Home (1922)	65	60.8	63.6	68.1	67.6	67.6
LS-522	Private Home (1922)	65	60.5	63.3	67.8	67.0	67.1
LS-523	Private Home (1924)	65	60.1	63.1	67.5	66.4	66.4
LS-524	Private Home (1922)	65	60.5	63.3	67.8	67.1	67.1
LS-525	Private Home (1925)	65	59.6	62.6	67.2	65.4	65.5
LS-526	Private Home (1868)	65	56.5	58.3	61.6	58.6	58.7
LS-527	Private Home (1903)	65	58.1	60.7	64.5	61.9	62.0
LS-528	Private Home (1923)	65	58.2	60.9	64.9	62.2	62.3
LS-529	Private Home (1918)	65	58.2	60.9	64.9	62.2	62.3
LS-530	Private Home (1900)	65	58.2	61.0	65.5	62.7	62.7
LS-531	Private Home (1925)	65	58.2	60.9	65.4	62.5	62.5
LS-532	Private Home (1894)	65	58.1	60.9	65.3	62.5	62.5
LS-533	Private Home (1900)	65	58.1	60.8	65.3	62.4	62.4
LS-534	Private Home (1903)	65	58.1	60.8	65.2	62.3	62.3
LS-535	Private Home (1919)	65	58.0	60.6	65.0	62.1	62.2
LS-536	Private Home (1922)	65	57.8	60.4	64.6	61.7	61.8
LS-537	Private Home (1919)	65	57.8	60.3	64.5	61.6	61.7
LS-538	Private Home (1925)	65	57.6	59.9	63.9	61.0	61.1
LS-539	Private Home (1925)	65	57.6	59.9	63.8	61.0	61.0
LS-540	Private Home (1866)	65	59.4	61.9	66.2	65.9	65.9
LS-541	Private Home (1904)	65	59.0	62.0	66.8	64.1	64.1

**TABLE L-7  
NOISE COMPATIBILITY OF SECTION 4(f) AND SECTION 6(f) LANDS-ALL  
ALTERNATIVES**

Map ID	Description	Land Use Compatibility Guideline by Use (DNL)	Existing Noise Level	Build Out + 5			
				No Action Alternative A	Build Out + 5 Alternative C	Build Out + 5 Alternative D	Build Out + 5 Alternative G
LS-542	Private Home (1907)	65	58.2	60.9	65.2	62.3	62.4
LS-544	Private Home (1905)	65	58.1	60.7	64.9	62.1	62.1
LS-545	Private Home (1912)	65	58.0	60.6	64.7	61.9	62.0
LS-546	Private Home (1912)	65	57.8	60.2	64.1	61.4	61.4
LS-547	Private Home (1870)	65	58.7	61.6	66.2	63.3	63.4
LS-548	Private Home (1910)	65	58.7	61.7	66.2	63.3	63.4
LS-549	Private Home (1924)	65	58.1	60.9	65.3	62.8	62.8
LS-550	Private Home (1922)	65	NA	60.2	64.5	61.5	61.6
LS-551	Private Home (1924)	65	56.8	58.8	62.8	59.5	59.5
LS-552	Private Home (1920)	65	57.9	60.1	62.8	60.6	60.7
LS-553	Private Home (1894)	65	57.7	59.9	63.1	60.7	60.8
LSS-1	Geodesic Dome	65	62.6	65.1	70.1	69.7	69.8
LSS-2	Elk Grove Cemetery	85	NA	63.1	54.7	54.5	54.4
LSS-3	Farmhouse Museum	65	NA	55.5	58.5	59.7	58.8
LSS-4	Historic Tonne House	65	NA	59.1	60.6	60.8	60.8
LSS-5	Original Farmhouse - 1	65	NA	54.8	55.2	54.8	54.7
LSS-6	Original Farm House - 2	65	NA	56.1	56.4	56.2	56.2

Legend:

 Direct Impact. Property to be acquired and/or demolished.

 Potential incompatible noise level without mitigation.

NA=Not Applicable or Available

Source: TPC Analysis

### L.3 IMPACTS TO SECTION 4(f) RESOURCES AND POTENTIAL MITIGATION MEASURES

This section identifies the Section 4(f) resources for which the statutory requirements shown below are applicable. As discussed earlier, Section 4(f) legislation, as established under the U.S. Department of Transportation Act of 1966, states:

(c) The Secretary may approve a transportation program or project (other than any project for a park road or parkway under section 204 of title 23) requiring the use of publicly owned land of a public park, recreation area, or wildlife and waterfowl refuge of national, State, or local significance, or land of an historic site of national, State, or local significance (as determined by the Federal, State, or local officials having jurisdiction over the park, area, refuge, or site)] only if—

- (1) there is no prudent and feasible alternative to using that land; and
- (2) the program or project includes all possible planning to minimize harm to the park, recreation area, wildlife and waterfowl refuge, or historic site resulting from the use.

### L.3.1 Summary of Impacts

The proposed Build Alternatives (C, D, and G) would directly affect seven (7) Section 4(f) lands, and potentially indirectly affect one site eligible for the NRHP. All of the Build Alternatives would result in the acquisition and/or displacement of some parks and historic sites. A total of three parks (part of *Silver Creek/DuPage County Forest Preserve*, *Schuster Park*, and *Bretman Park*) would be acquired under all of the Build Alternatives. *Schuster Park* is the only 6(f) property located within the project area and is proposed for acquisition under all of the Build Alternatives. Discussion of Section 6(f) impacts occur in **Section L.4**.

Four historic sites on or potentially eligible for the NRHP would be displaced (requiring acquisition) by all three Build Alternatives. These include: *St. Johannes Cemetery*, *Rest Haven Cemetery*, *Gas Service Station*, and *Schwerdtfeger Farmstead*. These direct impacts would occur as the acquisition of land associated with each of the Build Alternatives is completed, which is anticipated prior to the end of Construction Phase II.

Sources identified 134 sites of local historical importance within the project area that could be affected by the proposed Build Alternatives. Based on the analysis conducted for this Section 4(f) and 6(f) Evaluation, none of these sites would be directly affected by the Build Alternatives, but were considered relative to indirect/potential constructive use impacts. A review was conducted of the indirect impacts of the alternatives on these lands, and noise was identified as the only potential indirect impact. As shown on **Table L-7**, this evaluation showed that all three Build Alternatives could result in a constructive use impact to locally important historic sites. Alternative C would result in 45 local sites that would experience noise levels that would be incompatible with their use. Alternatives D and G would result in 23 local sites that would experience incompatible noise levels. While these noise levels are not anticipated to substantially impair the historic integrity of these structures, potential mitigation through sound insulation could affect or alter these structures. Potential mitigation measures, including specific sound insulation procedures are discussed later in this chapter. With proper mitigation techniques, no significant impacts to the local sites of historical importance are anticipated.

### L.3.2 Alternatives that Would Avoid Impacts

Through the EIS process, a number of alternatives were considered to address the stated needs of the proposed project. Based upon the application of secondary screening criteria presented in **Chapter 3, Alternatives** of the FEIS, three of the alternatives appear to be feasible and sufficiently prudent to warrant detailed consideration. Although the No Action Alternative (Alternative A) would not meet the stated purpose and need for the proposed action, it has been retained as a reference point for comparing the environmental consequences of the other retained alternatives in accordance with the requirements of NEPA. The alternatives retained for detailed consideration in **Chapter 5, Environmental Consequences** of the FEIS are the Build Alternatives (C, D and G). All three Build Alternatives would directly affect this Section

4(f)/6(f) land. Alternative A (No Action) does not meet the purpose and need as concluded in the EIS, and is not a reasonable alternative to the proposed action under NEPA. Under Section 4(f), the FAA must evaluate “prudent and feasible alternative[s] to using that land.” FAA concludes that Alternative A is imprudent because it does not meet the purpose and need of the proposed project.

As previously mentioned, subsequent to the Draft EIS, FAA was presented with suggestions and requests regarding the alternatives presented in the Draft EIS that could be considered for the purpose of avoiding or mitigating some of the impacts associated with proposed Build Alternatives. These suggested alternatives were provided to the FAA on May 6, 2005 for consideration. **Section 3.6** of the Final EIS evaluates the commenter developed derivatives in relation to the FAA’s screening criteria utilized in the EIS. FAA representatives evaluated these eight derivatives relative to the purpose and need. Based on its evaluation, FAA has determined that none of the commenter derivatives meet purpose and need. Therefore, these derivatives were not retained for secondary screening.

As a result of comments made on the Draft EIS, the Agency directed its staff to develop derivatives of Alternative C that would avoid or minimize potential impacts to the cemeteries (St. Johannes and Rest Haven). FAA representatives from within the Great Lakes Region (Airports, Air Traffic, CAMPO, TPC, and Runway Safety Officer) evaluated the FAA developed five derivatives in comparison to Alternative C. Based on its evaluation, FAA determined that none of the five FAA derivatives was a less restrictive alternative capable of performing as well as Alternative C. Similarly, none of the five derivatives would avoid or minimize impacts to the cemeteries while also performing as well as Alternative C.

As previously discussed, Green Street School was originally proposed for acquisition and demolition under Build Alternative C only. Subsequent to the preparation of the Draft EIS, as a part of the Draft Section 4(f) Evaluation and during the development of this Final EIS, FAA identified that a minor modification to the Green Street School chimney may obviate the need to acquire the property. FAA technical experts identified that a chimney on this structure would penetrate the Terminal Instrument Procedures (TERPS) Surfaces of proposed Runway 10R/28L. It appears at this time, if Build Alternative C were selected, the City of Chicago may need to obtain an aviation easement to lower the height of the chimney by 9.1 feet, which would avoid acquisition of the property. The FAA has determined that the lowering of this chimney could be done in accordance with Secretary of Interior’s *Standards for the Treatment of Historic Buildings* (U.S. Department of Interior, National Park Service, 1995). The City may also acquire this property and maintain the integrity of this historic property. A copy of FAA’s May 13, 2005 letter to the City of Chicago concerning the Green Street School is included in the Section 4(f) Evaluation in **Appendix L**. FAA submitted a letter to the IHPA on June 2, 2005 requesting concurrence on FAA’s determination that the proposed chimney lowering would not constitute an adverse impact to the historic nature of the structure.<sup>31</sup>

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<sup>31</sup> Letter from FAA to IHPA, June 2, 2005.

In an effort to avoid and minimize potential impacts to a property identified by representatives of Elk Grove Village, the City of Chicago may not acquire the Lake LGK Property (which was identified during the public review of the Draft EIS) within Elk Grove Village if a Build Alternative is approved in the FAA's Record of Decision, and the City of Chicago decides to proceed with the O'Hare Modernization. The FAA communicated this conclusion in a letter to Elk Grove Village issued on May 13, 2005 which specifically addresses the Lake LGK Property. A copy of the FAA's letter, contained in **Attachment L-2**, sets forth certain conditions under which City of Chicago could consider not acquiring this property. One other option may be for the City of Chicago to acquire the Lake LGK Property but maintain it as a "Pocket Park".

### **L.3.3 Measures to Minimize Harm**

As discussed above, FAA determined that there were no Build Alternatives that would avoid use of the Section 4(f) resources. In consideration of the substantial similarity between the environmental impacts for Build Alternatives C, D, and G, the FAA has identified the alternative that best fulfills its statutory mission and responsibilities as the "Preferred Alternative." Given the clear superiority of Alternative C in terms of the average annual delay reduction, the FAA has identified Alternative C, the Sponsor's proposed O'Hare Modernization Program, as the Preferred Alternative. See **Chapter 3, Alternatives** of the FEIS for further information.

Potential measures to minimize harm to Section 4(f) resources were then evaluated. Based on this evaluation, the mitigation measures for the proposed airport development were tailored to the specific requirements of either Section 4(f) and/or Section 6(f) as well as to the type of property affected.

FAA determined that appropriate measures to minimize harm from direct impacts to Section 4(f) resources will consist of fair market value payment for the Section 4(f) properties (parks and historic sites), and a commitment to provide replacement property for the Section 6(f) property, Schuster Park. The only potential indirect impacts on Section 4(f) resources would be the sound insulation necessary to mitigate incompatibility due to aircraft noise. FAA determined that appropriate measures to minimize harm from indirect/constructive use impacts to Section 4(f) resources that are locally important historic sites would be proper facility sound insulation that follows the FAA guidelines for sound insulation and the Secretary of Interior's *Standards for the Treatment of Historic Buildings* (U.S. Department of Interior, National Park Service, 1995). There would be no indirect/constructive use impacts on parks or NRHP sites. Further discussion of measures to mitigate impacts on Section 4(f) resources is included in the following sections.

### **L.3.4 Description of Section 4(f) Resources Impacted**

#### **L.3.4.1 Schuster Park (Bensenville Park District)**

All of the proposed Build Alternatives would require the acquisition of Schuster Park. Park District data indicate that this park is 6.4 acres in size. This park has playground facilities, a picnic area, three basketball courts, and a sports field with two soccer goal standards. There is a bike trail that transects the entire park. A softball/baseball back-stop is available. Another large

sports field takes up the remainder of the area. Deciduous trees border the park to the south, separating it from the railroad yard.<sup>32</sup> This park has been identified as a Section 4(f) and Section 6(f) land. This park is located within the Village of Bensenville and is owned and managed by the Bensenville Park District.

### Impacts to this Resource

*Direct Impact - Land Acquisition:* This Section 4(f) and Section 6(f) land would be acquired, if any of the Build Alternatives are selected, as part of the southwest acquisition area due to relocation of the rail line, extension of existing Runway 9R, and construction of the two south runways.

### Proposed Mitigation

The FAA has coordinated with the Bensenville Park District, the Illinois Department of Natural Resources (IDNR), and the National Park Service (NPS) concerning the impact to Schuster Park to develop specific mitigation measures tailored to address the unique requirements of this property, as well as meet the requirements of Section 4(f) and Section 6(f). To address the direct acquisition of Schuster Park, a 4(f)/6(f) property, the FAA, in consultation with the Park District and NPS, are considering the following mitigation measures if a Build Alternative is selected:

- Replacement in-kind of the recreational resource. The replacement of the recreational resources would occur in consultation with the Bensenville Park District to ensure that the recreational uses meet local needs, or
- Other options for securing replacement property as identified in working with the Bensenville Park District, IDNR, and the NPS.

Based on the location of this park, its assets, and size, this park appears to be a neighborhood park. The residences in close proximity to the park, whose occupants are likely the primary users of this park, would be acquired under any of the Build Alternatives. Schuster Park is a part of a system of parks within the Bensenville Park District boundaries and appears to provide facilities and a level of service similar to that of other parks within the Village of Bensenville and general vicinity. Therefore, the location of the replacement property would not necessarily need to be located in close proximity to the current park location. The impacts to this park would require mitigation under Section 4(f) as well as under Section 6(f) discussed later in **Section L.4**. A specific mitigation plan will be developed in cooperation with the Bensenville Park District, IDNR, NPS, and the FAA.

#### L.3.4.2 Bretman Park (Village of Bensenville)

Bretman Park, covering an area of approximately 2.1 acres, would be acquired under each of the Build Alternatives. This park provides playground facilities, a baseball/softball back-stop, and a

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<sup>32</sup> Source: Village of Bensenville Park District, TPC Field Observations.

sports field. There is a line of deciduous trees that separate the park from a railroad yard to the south. This park is owned and maintained by the Village of Bensenville.<sup>33</sup>

### Impacts to this Resource

*Direct Impact - Land Acquisition:* This Section 4(f) land would be acquired, if any of the Build Alternatives are selected, as part of the southwest acquisition area due to relocation of the rail line, extension of existing Runway 9R, and construction of the two south runways.

### Proposed Mitigation

Based on the location of this park, its assets, and size, this park appears to be a neighborhood park. The residences in close proximity to the park, whose occupants are likely the primary users of this park, would be acquired under any of the Build Alternatives. Bretman Park is a part of a system of parks within the Village of Bensenville and appears to provide facilities and a level of service similar to that of other parks within the Village of Bensenville and general vicinity. Proposed mitigation would include acquisition of Bretman Park at the fair market value.

#### L.3.4.3 Silver Creek (DuPage County Forest Preserve District)

The Forest Preserve District of DuPage County was established in 1915. In 1917, the first tax levy was made and the first preserve land was purchased: 79 acres in Oak Brook. Today, the Forest Preserve District owns and manages more than 24,000 acres. The District continues to acquire open spaces throughout the county to keep pace with the continuous sprawl of the urban landscape. Properties are considered based on the land's natural condition, resident flora and fauna, and other features such as connectivity to greenways, river ways, and existing preserves.

Approximately 9.3 acres of the DuPage County Forest Preserve, referred to as Silver Creek, and sometimes referred to as the Bensenville Ditch, would be acquired under any of the Build Alternatives. This preserve is undeveloped and has no recreational or parking facilities. Like all DuPage preserves, it is open to the public daily from one hour after sunrise to one hour after sunset. However, there is minimal public use of this property since there are no recreational or parking facilities. The Village of Bensenville maintains the area by mowing some of the grasses near the creek.<sup>34</sup>

### Impacts to this Resource

*Direct Impact - Land Acquisition:* This Section 4(f) land would be acquired, if any of the Build Alternatives are selected, as part of the southwest acquisition area due to relocation of the rail line, extension of existing Runway 9R, and construction of the two south runways.

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<sup>33</sup> Source: Village of Bensenville Park District, TPC Field Observations.

<sup>34</sup> Source: Village of Bensenville Park District, TPC Field Observations.

## Proposed Mitigation

The FAA has coordinated with the DuPage County Forest Preserve District concerning the impacted property to develop specific mitigation measures tailored to address the unique requirements of each property as well as meet the requirements of Section 4(f). At a meeting with the District, they indicated that there is an Intergovernmental Agreement with the Village of Bensenville that limits acquisition of this property to the condemnation process. It is through this condemnation process that the fair market value of the Silver Creek property would be determined. In consultation with the Forest Preserve District, it was discussed that the fair market value purchase established as a result of a condemnation process would be adequate mitigation for the potential loss of the Silver Creek property.

### L.3.4.4 St. Johannes Cemetery

St. Johannes Cemetery occupies approximately five acres in the southwest corner of the Airport. St. Johannes cemetery was formally laid out in 1850, although research indicates that the first burial was in 1849. This cemetery is currently owned and maintained by the St. John United Church of Christ in Bensenville, an Illinois not-for-profit association. A church structure was built in this area in the winter of 1849-50. The church building was moved, as the property was acquired to provide for the development of the original Orchard Field Airport in 1942. The cemetery remains intact, and burial services are still occasionally held at the cemetery.

The Determination of Eligibility (DOE) for the St. Johannes Cemetery was submitted to the IHPA for review on March 31, 2005. The FAA recommended this Cemetery eligible for listing in the NRHP. However, the IHPA did not concur with this recommendation.<sup>35</sup> As a result, coordination with the Keeper of the NRHP resulted in a determination that the cemetery is eligible for the NRHP.<sup>36</sup> On June 14, 2005, the IHPA submitted a letter to the Keeper of the NRHP stating that they would be filing a request for reconsideration of the eligibility determination in ten days.<sup>37</sup> IHPA submitted materials in support of the request for reconsideration to the Keeper of the NRHP on June 24, 2005.<sup>38</sup> FAA reviewed the materials submitted by IHPA to the Keeper of the NRHP and submitted materials in support of FAA's original recommendation of eligibility on July 7, 2005.<sup>39</sup> A response on the final determination of eligibility is due from the Keeper of the NRHP in July 2005. However, irrespective of the final determination on eligibility, for purposes of this EIS, FAA is treating St. Johannes Cemetery as a locally important historic property. Correspondence related to this property is included in **Attachment L-2**.

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<sup>35</sup> Letter from IHPA to FAA regarding St. Johannes Cemetery, April 29, 2005.

<sup>36</sup> Letter from Keeper of the NRHP to the FAA, June 9, 2005.

<sup>37</sup> Letter from IHPA to Keeper of the NRHP, June 14, 2005.

<sup>38</sup> Letter from IHPA to Keeper of the NRHP, June 24, 2005.

<sup>39</sup> Letter from FAA to Keeper of the NRHP, July 7, 2005.

## Impacts to this Resource

*Direct Impact - Land Acquisition and relocation:* This Section 4(f) land would be acquired and relocated, if any of the Build Alternatives are selected, as part of the southwest acquisition area due to relocation of the rail line, extension of existing Runway 9R, and construction of the two south runways. The cemetery, including the graves and headstones, would be required to be relocated.

## Proposed Mitigation

Even though there is no final determination of eligibility at this time from the Keeper of the NRHP, for purposes of this EIS, FAA is treating St. Johannes Cemetery as a historic property. As a result, the FAA has developed specific mitigation measures tailored to address the unique requirements of this property, as well as meet the requirements of Section 4(f). As a result of impacts to this Cemetery, a Draft Memorandum of Agreement (MOA), or an Agreement (if the cemetery is not determined to be eligible), is being developed which outlines the steps that would be taken in mitigating the adverse impacts. At a minimum, the following mitigation measures will be implemented if a Build Alternative is selected in the Record of Decision and implemented by the City:

- Map of the Cemetery - Within 180 days of the FAA's issuance of a Record of Decision, if a Build Alternative is approved, and the City of Chicago's decision to proceed with the proposed O'Hare Modernization, the City of Chicago would produce a professional level survey of all identified graves, and all historic features visible on the ground surface within St. Johannes Cemetery.
- Photographic Recordation - The headstones and all other above ground features will be recorded with archival photography prior to their removal. The City of Chicago would prepare six to nine, 5" x 7", 35 mm, archivally-processed, black-and-white photographs of each headstone.
- A copy of documentation related to the MOA will be provided to the National Park Service, the, the St. John's United Church of Christ, Village of Bensenville, and the Bensenville Historical Commission.

### L.3.4.5 Rest Haven Cemetery

Rest Haven Cemetery is a small cemetery located approximately one-quarter mile south of the St. Johannes Cemetery. The Cemetery is owned by the Rest Haven Cemetery Association, an Illinois not-for-profit association. Rest Haven Cemetery is a religious cemetery in continuous use since at least 1864 for the burials of member of two churches, the United Methodist Church of Itasca and the United Methodist Church of Bensenville (First Evangelical Church) and their predecessor institutions.

The Rest Haven Cemetery DOE was submitted to the IHPA for review on May 25, 2005. On June 24, 2005, IHPA requested bibliography materials in support of FAA's DOE.<sup>40</sup> FAA submitted the bibliography materials to IHPA on June 27, 2005.<sup>41</sup> A response on the IHPA's determination of eligibility is due in July 2005. However, irrespective of the determination on eligibility, for purposes of this EIS, FAA is treating Rest Haven Cemetery as a locally important historic property.

### Impacts to this Resource

*Direct Impact - Land Acquisition and relocation:* This Section 4(f) land would be acquired and relocated, if any of the Build Alternatives are selected, as part of the southwest acquisition area due to relocation of the rail line, extension of existing Runway 9R, and construction of the two south runways. The cemetery, including the graves and headstones, would be required to be relocated.

### Proposed Mitigation

Even though there is no determination of eligibility at this time from the IHPA, for purposes of this EIS, FAA is treating Rest Haven Cemetery as a historic property. As a result, the FAA has developed specific mitigation measures tailored to address the unique requirements of this property, as well as meet the requirements of Section 4(f). As a result of impacts to this Cemetery, a Draft Memorandum of Agreement (MOA), or an Agreement (if the cemetery is not determined to be eligible), is being developed which outlines the steps that would be taken in mitigating the adverse impacts. The following mitigation measures will be implemented if a Build Alternative is selected:

- Map of the Cemetery - Within 180 days of the FAA's issuance of a Record of Decision, if a Build Alternative is approved, and the City of Chicago's decision to proceed with the proposed O'Hare Modernization, the City of Chicago would produce a professional level survey of all identified graves, and all historic features visible on the ground surface within Rest Haven Cemetery.
- Photographic Recordation - The headstones and all other above ground features will be recorded with archival photography prior to their removal. The City of Chicago would prepare six to nine, 5" x 7", 35 mm, archivally-processed, black-and-white photographs of each headstone.
- A copy of documentation related to the MOA will be provided to the National Park Service, the Rest Haven Cemetery Association, Village of Bensenville, and the Bensenville Historical Commission

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<sup>40</sup> Letter from IHPA to FAA, June 24, 2005.

<sup>41</sup> Letter from FAA to IHPA, June 27, 2005.

### L.3.4.6 Gas Service Station (Village of Bensenville)

This facility, which was recommended by FAA as eligible for listing on the NRHP, is a vacant roadside gas service station. This site is owned by the Village of Bensenville, who reportedly is considering demolishing the structure.<sup>42</sup> A formal Determination of Eligibility (DOE) was submitted to the Illinois SHPO on April 22, 2005. SHPO concurred with FAA and has indicated that this property "may be eligible for listing on the National Register of Historic Places." A copy of the May 10, 2005 SHPO letter is included in **Attachment L-2**.

As noted in the DOE analysis, Irving Park Road was an old plank road which appears to be the early Western Plank Road. The Western Plank Road existed as early as 1851 and was one of the spokes that linked the early city of Chicago to the outlying portions of Cook County and other counties. Prior to the formal DOE, this Gas Service Station was identified as potentially eligible for the NRHP under the themes of commerce, trade, and transportation. It was noted to be a good example of a road side resource built in the Gothic Revival Style. It appears to date between 1920 and 1940, when petroleum companies built facilities that were familiar, such as a house style.

#### Impacts to this Resource

*Direct Impact - Land Acquisition:* This Section 4(f) land would be acquired, if any of the Build Alternatives are selected, as part of the southwest acquisition area due to relocation of the rail line, extension of existing Runway 9R, and construction of the two south runways.

#### Proposed Mitigation

To address the project-related impacts (acquisition) at this historic site, an MOA is being developed that outlines the proposed mitigation measures. At a minimum, the following mitigation measures will be implemented if a Build Alternative is selected in the Record of Decision and implemented by the City:

- Within 180 days of the FAA's issuance of a Record of Decision, the City of Chicago (with oversight by FAA) will produce a Historic American Building Survey (HABS) document of the Schwerdtfeger Farmstead. This document will include:
  - Measured Drawings: The HABS document will include a set of measured drawings. The set of measured drawings will include plans, elevations, sections, details and a cover sheet with a site plan and written information.
  - Large-Format Photographs: The HABS document will include a set of large-format black and white photographs that are perspective corrected. Photographs will include overall views, elevations and details of important exterior and interior features of the buildings.

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<sup>42</sup> Conversation between Karen Poulson (Archaeological Research Incorporated) and Steve Marshall Assistant Village Manager of Community Development, Village of Bensenville (June 20, 2004)

- **Written History:** The HABS document will include an in depth critically developed historic context of the building. **Archival Documentation:** The HABS document will be produced in accordance with all archival requirements as outlined by the National Park Service.
- Copies of the HABS document will be distributed to the NPS, the IHPA, the Village of Bensenville, and the Bensenville Historical Commission.

#### **L.3.4.7 Schwerdtfeger Farmstead (City of Chicago)**

A Determination of Eligibility (DOE) for the Schwerdtfeger Farmstead was prepared and submitted to the IHPA for review on May 20, 2005. IHPA submitted a letter to the FAA on June 22, 2005, with questions regarding information contained in the FAA's DOE for the Schwerdtfeger Farmstead.<sup>43</sup> FAA provided a response to the questions posed by IHPA on June 24, 2005.<sup>44</sup> A response on the IHPA's determination of eligibility is due in July 2005. However, irrespective of the determination on eligibility, for purposes of this EIS, the FAA is treating the Schwerdtfeger Farmstead as a historic property.

The Schwerdtfeger Farmstead is a circa 1850 two-story brick residence and was built in two episodes. Charles Schwerdtfeger was born in the Province of Hanover in 1813 and immigrated to this country in 1833. The family originally moved to Indiana and then relocated to Addison Township around 1840. By 1877 his son owned 125 acres of prairie and 16 acres of timber. The original Schwerdtfeger Farmstead was purchased by the City of Chicago in 1950. This City leased the farmstead for residential use for several years, but is now currently vacant.

#### **Impacts to this Resource**

*Direct Impact – Building Demolition:* This Section 4(f) land, which is currently owned by the City of Chicago, would be demolished as required for development of any of the Build Alternatives, if selected.

#### **Proposed Mitigation**

Even though there is no determination of eligibility at this time from the IHPA, for purposes of this EIS, FAA is treating Schwerdtfeger Farmstead as a locally important historic property. As a result, the FAA has developed specific mitigation measures tailored to address the unique requirements of this property, as well as meet the requirements of Section 4(f). As a result of impacts to this property, a Draft Memorandum of Agreement (MOA), or an Agreement (if the cemetery is not determined to be eligible), is being developed which outlines the steps that would be taken in mitigating the adverse impacts. At a minimum, the following mitigation measures will be implemented if a Build Alternative is selected in the Record of Decision and implemented by the City:

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<sup>43</sup> Letter from IHPA to FAA, June 22, 2005.

<sup>44</sup> Letter from FAA to IHPA, June 24, 2005.

- Within 180 days of the FAA's issuance of a Record of Decision, the City of Chicago (with oversight by FAA) will produce a Historic American Building Survey (HABS) document of the Schwerdtfeger Farmstead. This document will include:
  - Measured Drawings: The HABS document will include a set of measured drawings. The set of measured drawings will include plans, elevations, sections, details and a cover sheet with a site plan and written information.
  - Large-Format Photographs: The HABS document will include a set of large-format black and white photographs that are perspective corrected. Photographs will include overall views, elevations and details of important exterior and interior features of the buildings.
  - Written History: The HABS document will include an in depth critically developed historic context of the building. Archival Documentation: The HABS document will be produced in accordance with all archival requirements as outlined by the National Park Service.
  - Copies of the HABS document will be distributed to the NPS, the City of Chicago, the Chicago Landmarks Commission, the Chicago Historical Society, and the IHPA.

#### **L.3.4.8 Locomotive Museum in Veteran's Park (Bensenville Park District)**

The Locomotive Museum (Railroad Monument) is located within *Veteran's Park* in Bensenville and is under the jurisdiction of the Bensenville Park District. Bensenville's *Veteran's Park* provides an ice rink, sports fields (softball/little league), and locomotive museum. This park consists of 6.9 acres of land. This site was identified based on its park designation, but was also identified in the review of locally important historic sites due to the presence of the Locomotive Museum. The steam locomotive at the Railroad Monument was built by the American Locomotive Company of Schenectady, New York for the Studebaker Motorcar Company in 1922. The monument, a reminder of the Milwaukee Road's impact on the development of Bensenville, was dedicated in 1961. The Bensenville Park District purchased additional cars in 1983, including a 1951-era Milwaukee Road caboose #992114 and the 1947-era Milwaukee Road large coach car. This locomotive museum is open to the public by appointment only. At this site are old steam locomotive cars and a building that houses train models and is the location where a train enthusiasts group meets twice weekly. This museum is currently not on the NRHP but was identified as a potentially locally important historic site.

#### **Impacts to this Resource**

No direct impacts would occur at this site with any of the Build Alternatives.

*Potential Indirect Impacts - Noise:* Aircraft noise levels at this site are compatible with the active recreational uses contained in the park. However, changes in noise associated with the Build Alternatives could be incompatible with one park activity/use: the locomotive museum.

While the noise exposure at this park is compatible with the active recreation uses, a separate review was conducted relative to the locomotive museum at this park. History museums are normally compatible with aircraft noise up to 65 DNL, unless sound insulated. While the exterior noise levels at this site exceed the FAA's land use compatibility guidelines, substantial impairment of this facility is not anticipated. A quiet setting does not appear to be a valued attribute of this site since the operation of model trains within the museum results in elevated interior sound levels. Further, increased aircraft noise levels would not diminish the patrons' use of this site, and therefore, no substantial impairment of this Section 4(f) resource is anticipated.

This site is also a public park. As noted earlier, active recreation occurs within this park which is compatible with aircraft noise levels up to 75 DNL. Because all Build Alternatives, if one was selected, would result in noise levels less than 75 DNL, no adverse impact would occur at this site.

### **Proposed Mitigation**

Based on the uses of this facility, no mitigation appears to be warranted at this site since there would not be a substantial impairment of this resource.

#### **L.3.4.9 Additional Locally Important Historic Sites**

As noted in **Table L-6**, 134 sites were identified as having local historical importance and were reviewed relative to the impacts of the Build Alternatives. None of these sites would be directly affected by the Build Alternatives, but were considered relative to indirect/potential constructive use impacts. A review was conducted of the indirect impacts of the alternatives on these lands, and noise was identified as the only potential indirect impact. **Table L-7** identified the following sites that could be potentially affected by noise impacts and are described as follows:

#### **Description of Locally Important Historic Sites**

**St. John's United Church of Christ (LS-62):** Originally located on the site of the St. Johannes Cemetery, the church was moved to its present location at Foster Avenue and Route 83 in Bensenville in the 1950s to enable the development of the southern airfield at O'Hare. The church structure was originally built in 1873.

**Korthauer Log House (LS-86):** This facility, located at 200 S. Church Street in Bensenville is owned by the Bensenville Library. The log house presently serves as home of the Bensenville Historical Commission and serves as a local museum. The Bensenville Historical Society and the Bensenville Historical Commission restored the 1844 log house (demolishing the additions which encased the cabin in 1989) and moved it to its present location. It was the home of the Korthauer family, and serves as a living history center for use by school and community groups. In the mid 1840s, Henry Korthauer and Dietrich Struckman were contracted to build a

church and a parsonage with a schoolroom, known as the original St. John's United Church of Christ. Henry Korthauer later built an organ for the church.<sup>45</sup>

**43 Residences:** (LS-59, LS-62, LS-63, LS-75, LS-83, LS-83, LS-86, LS-88, LS-480, LS-482, LS-487, LS-502, LS-503, LS-504, LS-505, LS-506, LS-507, LS-508, LS-509, LS-510, LS-511, LS-512, LS-513, LS-515, LS-516, LS-517, LS-518, LS-519, LS-520, LS-521, LS-522, LS-523, LS-524, LS-525, LS-530, LS-531, LS-532, LS-533, LS-534, LS-535, LS-540, LS-541, LS-542, LS-547, LS-548, LS-549). Each of these sites was identified by either: 1) 1971-1975 County Landmark Survey (properties that IHPA surveyors thought had countywide historical importance), 2) IHPA historic site files; and 3) 1974-1975 Sprague Survey<sup>46</sup> housed at IHPA. These homes were built in the late 1800s and early 1900s.

### Impacts to Locally Important Historic Sites

No direct impacts would occur at any of the sites identified by local sources with any of the Build Alternatives.

*Potential Indirect Impacts - Noise:* **Table L-7** identifies the locally important historic sites that would exceed the FAA's noise compatibility guidelines with the proposed Build Alternatives. These incompatible noise levels are not anticipated to substantially impair the use of these properties. Sound insulation would occur as the noise level would not be compatible with residential uses. Sound insulation would not be needed due to the property having local historic importance. With any Build Alternative, if selected, sound insulation following the Secretary of Interior's *Standards for the Treatment of Historic Buildings* (U.S. Department of Interior, National Park Service, 1995) and FAA guidelines would avoid adverse impacts to these sites. These sound insulation measures are identified in the following paragraphs.

As sound insulation to historic properties may constitute a Federal undertaking, a programmatic agreement would address all requisite requirements of Section 106. It would be expected that parties to the programmatic agreement would include: FAA, National Park Service (NPS), and Illinois State Historic Preservation Office (SHPO). Provisions of the programmatic agreement could include:

- I. The mitigation options will be evaluated to comply with the Secretary of Interior's *Standards for the Treatment of Historic Buildings* (U.S. Department of Interior, National Park Service, 1995).
- II. The City of Chicago will ensure that the window mitigation project complies with the Secretary of Interior's *Standards for the Treatment of Historic Buildings* (U.S. Department of Interior, National Park Service, 1995). The City of Chicago

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<sup>45</sup> <http://history.bensenville.lib.il.us/Churches/StJohn.html>

<sup>46</sup> During the years of 1971-1975, the State Historic Preservation Office survey director Paul Sprague and staff surveyors reviewed all towns and cities in the State of Illinois with a population greater than 500. As part of this survey historically significant structures built prior to World War II were located, photographed and cataloged. Data collected during this project were classified into three categories: P = those potentially significant enough to be included on the National Register of Historic Places; HD = those probably not of sufficient quality to be listed individually, but likely to qualify as contributing structures within a National Register of Historic Places District; and O = those of marginal architectural interest or significance.

will hire a qualified sound insulation/historic build restoration consultant, approved by the consulting parties, to ensure that the design and specifications for the undertaking are developed in compliance with the Secretary of the Interior's *Standards for Treatment of Historic Buildings*. No construction, alteration, remodeling or any other physical action to the facilities will be undertaken by the City of Chicago, which would affect the appearance or structural integrity of the facility without the express written permission of the NPS, FAA, and SHPO.

- III. The City of Chicago shall ensure that any change order to the project design required subsequent to the approval of the project will be developed in consultation with the NPS, FAA, and SHPO.
- IV. Should the SHPO object within 30 calendar days to any construction documents provided for review pursuant to the terms of this Agreement, the City of Chicago shall consult with NPS, FAA, and SHPO to resolve the objection. If the City of Chicago determines that the objections cannot be resolved, the City of Chicago shall request the further comments of the SHPO. Any SHPO comment provided in response to such a request shall be taken into account by the City of Chicago in accordance with 36 CFR §800.6(c)(2) with reference only to the subject of the dispute under this agreement. In the event that a SHPO comments are not resolved, will refer the issue to the ACHP for resolution.
- V. Should the City of Chicago, NPS, FAA, and SHPO determine that the terms of a proposed programmatic agreement cannot be met or believes that a change is necessary, that signatory is responsible for immediately requesting that other signatories consider voiding, amending, or affecting an amendment to this programmatic agreement. Such an agreement or addendum shall be executed in the same manner as the original agreement.
- VI. DURATION. No sooner than 30 days after execution of the programmatic agreement, the City of Chicago shall initiate the process for mitigation outlined herein and proceed diligently and expeditiously to complete the mitigation project.
- VII. AMENDMENTS. If any signatory to the programmatic agreement, determines that its terms will not or cannot be carried out or that amendment to its terms must be made, that party shall immediately consult with the other parties to develop an amendment to this programmatic agreement pursuant to 36 CFR §800.6(c) (7) and §900.6 (c)(8). The amendment will be effective on the date a copy signed by all of the original signatories is filed with the ACHP. If the signatories cannot agree to appropriate terms to amend the programmatic agreement, any signatory may terminate the agreement for reason in accordance with Stipulation IX below.
- VIII. UNEXPECTED DISCOVERIES. The City of Chicago will notify the FAA as soon as practicable if it appears that an Undertaking will affect a previously unidentified property that may be historic, or affect a known historic property in

an unanticipated manner. The City will stop sound insulation activities in the vicinity of the discovery, and take all reasonable measures to avoid or minimize harm to the property until FAA concludes consultation with the SHPO, and any Native American Tribe that might attach religious and cultural resource significance to the affected property. In the case of human remains, the City will also immediately notify the local law enforcement office and the county coroner/medical examiner.

- IX. TERMINATION. If the programmatic agreement is not amended following the consultation set out in Stipulation VII, it may be terminated. Within 30 days following termination, the FAA shall notify the signatories if it will initiate consultation to execute a programmatic agreement with the signatories under 36 CFR §800.6(c)(1) or request the comments of the ACHP under 36 CFR §800.7(a) and proceed accordingly.

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#### **L.4 IMPACTS TO DOI SECTION 6(F) LANDS AND POTENTIAL MITIGATION MEASURES**

Special procedures are required when development would affect lands purchased or developed using Department of Interior (DOI) Land and Water Conservation Fund Act (LAWCON) monies. Section 6(f) of the LAWCON Act of 1965 (Public Law 88-578), and Title 16 U.S. Code, Section 4601-8(f)(3), commonly referred to as Section 6(f), requires:

No property acquired or developed with assistance under this section shall, without the approval of the Secretary [of the Interior], be converted to other than public outdoor recreation uses. The Secretary shall approve such conversion only if he finds it to be in accord with the then existing comprehensive statewide outdoor recreation plan and only upon such conditions as he deems necessary to assure the substitution of other recreation properties of at least equal fair market value and of reasonably equivalent usefulness and location.

The authority to approve Section 6(f) conversions has been delegated to the Regional Directors of the National Park Service (NPS).

To comply with Section 6(f), the FAA must demonstrate to the DOI that it has satisfactorily completed the Section 4(f) process. Additionally, the FAA must provide the information to the DOI so it can make the requisite Section 6(f) findings. Part of the Section 4(f) process requires the examination of sufficiently prudent and feasible alternatives to use of the land and the development of mitigation measures to minimize harm to the recreational facility or area. Similarly, one of the prerequisites that must be met before NPS will consider the conversion request is that "all practical alternatives to the proposed conversion have been evaluated."<sup>47</sup>

In the State of Illinois, the Illinois Department of Natural Resources (IDNR) manages the LAWCON funds. Therefore, IDNR was contacted to identify recreational resources in the

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<sup>47</sup> 36 C.F.R. § 59.3

Airport vicinity that have used LAWCON funds. IDNR identified one park, Schuster Park (P-8) in Bensenville, which has received LAWCON funds for its purchase.

#### **L.4.1 Existing Statewide Comprehensive Outdoor Recreation Plan**

As noted earlier, in the State of Illinois, the Department of Natural Resources (IDNR) is responsible for overseeing LAWCON funding. IDNR maintains the Statewide Comprehensive Outdoor Recreation Plan (SCORP) as a guide and vision for outdoor recreation in Illinois. The SCORP, required to maintain Illinois' eligibility for the Land and Water Conservation Fund, is a five-year plan that includes an assessment of the state's natural resources; demographic trends; outdoor recreation demand, supply and needs; and priorities for the LAWCON Program. Since 1965, nearly \$140 million of LAWCON funds have been allocated to Illinois.

The SCORP notes that Illinois devotes more than 1.34 million acres to outdoor recreation. Federally-managed lands are the largest public land areas: 479,065 total acres. State-managed lands total 444,500 acres and include IDNR sites as well as historic sites managed by the Illinois Historic Preservation Agency. County agencies—forest preserve districts, conservation districts, and various other county departments—manage 187,345 acres, mainly in northern and central Illinois. Park districts and municipal agencies provide a system of local lands, 91,884 acres statewide that directly serve communities. Public schools provide an estimated 22,971 acres of lands available for recreation. Quasi-public lands are estimated at 11,486 acres. Estimated at more than 103,370 acres, private lands provide all sorts of outdoor recreation opportunities.

To determine statewide outdoor recreation needs, the IDNR considered demographic trends, surveys of outdoor recreation demand, public input, facility surveys, other natural resource plans, and the current supply of land and facilities. The SCORP survey noted that walking for pleasure, driving and sightseeing, observing wildlife, picnicking, fishing, and bicycling are the most popular adult outdoor recreation activities. It also noted that most surveyed people "would like to have more undeveloped open space. Community parks and forest preserves, especially in urban settings, are popular, especially with families. These various surveys provide state and local policy makers with a clear understanding of what people want and need from their outdoor recreation experiences."

Within the SCORP, the following *priorities for State and local activities* are identified:

- Accessibility to underserved populations
- Water resources:
- Greenways and Trails: Greenways and trails remain a SCORP priority, with increasing emphasis on connecting existing greenways and trails to create a statewide network.
- Visitor Information and Conservation Education
- Acquisition: The public has consistently called for both IDNR and local agencies to acquire additional land for open space and outdoor recreation.

- Natural Areas, wildlife habitat and wetlands

*Local project priorities* are: Adaptive Reuse and Redevelopment of Urban Lands, Local Planning and Coordination; and Basic Facilities (“Open space alone cannot meet all outdoor recreation needs. Basic outdoor recreation facilities such as parking and restrooms are essential for most outdoor activities.”) The SCORP, however, does not specifically identify recreational deficiencies and therefore only provides guidance on statewide recreational objectives. Therefore, the objectives of this mitigation would be coordinated with the recreation objectives of the affected local communities/park districts.

#### **L.4.2 Schuster Park (Bensenville Park District)**

All of the proposed Build Alternatives would require the acquisition of Schuster Park. This 6.4 acre park is located in the Village of Bensenville and is managed by the Bensenville Park District. This park has playground facilities, three basketball courts, and a sports field with two soccer goal standards. There is a bike trail that transects the entire park. A softball/baseball back-stop is available. Another large sports field takes up the remainder of the area. Deciduous trees border the park to the south, separating it from the railroad yard.<sup>48</sup> This park has been identified as a Section 4(f) and Section 6(f) land. The acquisition of the Schuster Park would constitute a conversion of the property and the Director of the NPS must approve the conversion. See **Attachment L-2** for a copy of documentation from the IDNR regarding this property.

##### **L.4.2.1 Mitigation Requirements for Section 6(f) Properties**

Special procedures are required when development would affect lands purchased or developed using the Department of Interior LAWCON monies. Section 6(f) requires that property acquired or developed with assistance under Section 6(f) not be converted to other than public outdoor recreation uses without the approval of the Secretary of the Department of the Interior. The Secretary shall approve such conversion only if he finds it to be in accord with the current statewide comprehensive outdoor recreation plan and only upon such conditions as he deems necessary to assure the substitution of other recreation properties of at least equal fair market value and of reasonably equivalent usefulness and location. The authority to approve Section 6(f) conversions has been delegated to the Regional Directors of the NPS.

##### **L.4.2.2 Proposed Mitigation**

In February 2005 the FAA met with representatives from the Bensenville Park District to begin the process of identifying mitigation for this park. Additional meetings were held in March, April, and May 2005 to further discuss potential mitigation options. Per Section 6(f) requirements, mitigation would include “other recreation properties of at least equal fair market value and of reasonably equivalent usefulness and location”. To address the direct acquisition

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<sup>48</sup> Source: Bensenville Park District and field observations.

of Schuster Park, a 4(f)/6(f) property, the FAA, in consultation with the Park District and NPS, are considering the following mitigation measures if a Build Alternative is selected:

- Replacement in-kind of the recreational resource. The replacement of the recreational resources would occur in consultation with the Bensenville Park District to ensure that the recreational uses meet local needs, or
- Other options for replacement of this property, as identified in working with the Bensenville Park District, City of Chicago, IDNR, FAA, and the NPS.

Based on the location of this park, its assets, and size, this park appears to be a neighborhood park. The residents, which are likely the primary users of this park, would be acquired under any of the Build Alternatives, if selected. Therefore, the location of the replacement property would not necessarily need to be located in close proximity to the current park location. The impacts to this park would require mitigation under Section 4(f) as well as under Section 6(f). A specific mitigation plan will be developed in cooperation with the Bensenville Park District, IDNR, NPS, the City of Chicago, and the FAA.

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## L.5 COORDINATION

The FAA developed and implemented a comprehensive and proactive public involvement program on the Draft EIS for the O'Hare Modernization. The facets of the program included:

- Public and Agency Scoping;
- Agency Coordination including initiatives with Cooperating Agencies;
- Public Outreach Program including extensive Environmental Justice Outreach;
- Utilization of the World Wide Web including the development and implementation of two public websites updated throughout the EIS process: the OMP EIS Website at [www.ompeis.net](http://www.ompeis.net), as well as the O'Hare Modernization Program Document Library file sharing site at: [www.agl.faa.gov/OMP/](http://www.agl.faa.gov/OMP/). In order to provide early access to key information prior to release of the Draft EIS, the FAA began posting modeling data and other EIS-related documentation in July 2004. Through November 2004, FAA had posted over 7.5 millions pages related to O'Hare.

### L.5.1 Coordination with Public Agencies and Officials

The FAA acknowledges and appreciates the significant role played by the following agencies in preparing the EIS by serving as cooperating agencies: United States Environmental Protection Agency (USEPA), Illinois Environmental Protection Agency (IEPA), United States Army Corps of Engineers (USACE), United States Fish and Wildlife Service (FWS), and Federal Highway Administration (FHWA). FAA also acknowledges and is thankful to the Illinois Department of Transportation (IDOT) and Illinois Department of Natural Resources (IDNR) for their participation in a cooperative fashion even though they did not accept "formal" cooperating agency status. In addition to formal cooperating agency contacts, FAA worked closely with

numerous other Federal, state and local agencies throughout the EIS process, including Northeastern Illinois Planning Commission (NIPC), United States Department of Agriculture (USDA), Illinois Historic Preservation Agency (IHPA), Illinois State Toll Highway Authority (ISTHA), Metropolitan Water Reclamation District of Greater Chicago (MWRDGC), Regional Transportation Authority (RTA), and Chicago Area Transportation Study (CATS). These extensive contacts benefited the FAA by giving a substantial amount of information and perspective on the proposed development from the viewpoint of the other agencies. These meetings also were intended to enhance the ability of those entities to comment meaningfully, both during the development of the Draft EIS and Draft Section 4(f) and 6(f) Evaluation.

Simultaneously with preparation, distribution, and review of this EIS, the U.S Army Corps of Engineers (USACE) is reviewing and processing a Section 404 permit application and pre-discharge notification per the requirements of the Clean Water Act, as submitted by the City of Chicago Department of Aviation (DOA). Similarly, the Illinois Environmental Protection Agency (IEPA) is reviewing anti-degradation (Water Quality Standards) and Section 401 (Water Quality Certification) information pertaining to potential project-related wetland impacts. In furtherance of this goal, public hearings were held on the Draft EIS and were hosted by FAA, the USACE, and the IEPA for purposes of meeting these agencies' requirements.

Throughout the development of the City's wetland restoration plan and USACE Section 404 permit application, the DuPage County Forest Preserve District was involved in discussions regarding potential mitigation sites within their jurisdiction. A meeting was also held with the DuPage County Forest Preserve District to discuss impacts and potential mitigation measures associated with Silver Creek. FAA sent two letters to the DuPage County Forest Preserve District outlining the coordination that has taken place and identifying the understandings that have been reached regarding the potential West Bank wetlands compensatory mitigation and the Silver Creek property. Copies of correspondence with the DuPage County Forest Preserve District are included in **Attachment L-2**.

A meeting was held with the IDNR, which is the agency that oversees the Section 6(f) program for the State of Illinois. IDNR provided documents related to Schuster Park and outlined the requirements of mitigation for impacts to Section 6(f) properties. Copies of these documents are included in **Attachment L-2**.

## **L.5.2 Coordination with Owners of Section 4(f) and Section 6(f) Lands**

FAA has made several requests for meetings with the owners of the Section 4(f) and Section 6(f) resources. Copies of these correspondence letters and requests for information pertaining to Section 4(f) resources, in addition to some response letters from the owners, are included in **Attachment L-2**.

### **L.5.2.1 Bensenville Park District (Schuster Park)**

Meetings and discussions with the Bensenville Park District were held in February, March, April, and May of 2005 to discuss potential mitigation measures for the potential impacts to Schuster Park. Because this site is a Section 6(f) property, replacement in-kind for the impacts to

this recreational resource is being investigated. Because the Bensenville Park District is already substantially developed, there is limited vacant land available for replacement of this park. FAA coordination with the NPS, IDNR (the agency responsible for overseeing the LAWCON program), and Bensenville Park District is ongoing.

#### **L.5.2.2 DuPage County Forest Preserve District (Silver Creek)**

A coordination meeting was held on April 19, 2005 with the DuPage County Forest Preserve District. At a meeting with the District, they indicated that there is an Intergovernmental Agreement with the Village of Bensenville that limits acquisition of this property to the condemnation process. It is through this condemnation process that the fair market value of the Silver Creek property would be determined. In consultation with the Forest Preserve District, it was discussed that the fair market value purchase established as a result of a condemnation process would be adequate mitigation for the potential loss of the Silver Creek property. A copy of FAA's May 10, 2005 letter outlining the discussions of this meeting, and the DuPage County Forest Preserve District's May 16, 2005 letter confirming FAA's understanding concerning the acquisition of Silver Creek are included in **Attachment L-2**.

#### **L.5.2.3 Village of Bensenville and Elk Grove Village Legal Representatives (Bretman Park and other Potential Resources)**

On March 7, 2005, March 28, 2005, and again on April 13, 2005, FAA submitted letters to the Village of Bensenville and Elk Grove Village requesting input on potential Section 4(f) resources within these jurisdictions. A teleconference call was held on April 20, 2005 with the representatives of the Village of Bensenville and Elk Grove Village. During this teleconference call, the FAA offered these representatives a further opportunity to provide any additional information to aid in identifying all potential Section 4(f) resources and identify potential mitigation measures associated with impacts to the Section 4(f) resources. On April 29, 2005, information was submitted on the Elk Grove Village system of "Pocket Parks"; and on May 6, 2005, two separate documents were submitted to the FAA by representatives of St. John's United Church of Christ, Rest Haven Cemetery Association, the Village of Bensenville and Elk Grove Village. See **Attachment L-2** for a copy of this correspondence.

#### **L.5.2.4 Cemetery Associations and Other Issues Relating to Cemetery Acquisition**

Coordination has occurred with representatives of St. Johannes and Rest Haven Cemeteries. On March 10, 2004, FAA sent letters to the St. John's United Church of Christ and the Rest Haven Cemetery Association requesting information related to these two cemeteries to assist in the development of the EIS, as well as this Section 4(f) Evaluation. FAA received correspondence regarding the March 10<sup>th</sup> letters and subsequent FAA phone calls on May 4, 2004. In addition, FAA held a meeting on July 22, 2004, with representatives for St. John's Church of Christ and Rest Haven Cemetery Association.<sup>49</sup> Correspondence received from these representatives on

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<sup>49</sup> Transcript from meeting between FAA and Representatives for St. John's Church of Christ and Rest Haven Cemetery Association on July 22, 2004.

October 15, 2004 speaks in detail about cemetery related issues, including eligibility for the NRHP. This correspondence is included in **Attachment L-2**.

As submitted by the City of Chicago, the proposed Airport Layout Plan for the OMP called for the use of St. Johannes and Rest Haven Cemeteries. At the time of this submission, the City intended to use its land acquisition authority to obtain title to these properties and to relocate the bodies of those buried in the cemeteries to another nearby existing cemetery if the FAA approved the OMP. These acquisitions would be necessary to construct Runway 10C/28C and establish an international air cargo facility in the southwestern quadrant of O'Hare.

Those who oppose the relocation of graves from St. Johannes and Rest Haven Cemeteries have asserted that the FAA's approval of any proposal that would require relocation of these cemeteries would violate their First Amendment right to free exercise of religion as well as the Religious Freedom Restoration Act. FAA has carefully studied these claims in the Final EIS and has identified a proposed resolution to these legal issues. In doing so, the FAA proposes to find that Rest Haven Cemetery, unlike St. Johannes, may not need to be relocated. A final decision on these legal issues will be made in the ROD after opportunity for comment. For further information see **Section 5.22, Other Issues Relating to Cemetery Acquisition**.

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