IEPA Log No.: **C-0418-12**
CoE appl. #: **2013-17**

Public Notice Beginning Date: **4/5/2013**
Public Notice Ending Date: **4/26/2013**

Section 401 of the Federal Water Pollution Control Act
Amendments of 1972

Section 401 Water Quality Certification to Discharge into Waters of the State

Public Notice/Fact Sheet Issued By:

Illinois Environmental Protection Agency
Bureau of Water
Permit Section
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276
217/782-3362

Name and Address of Discharger: Northwest Lake Forest Hospital – US Route 41 Entrance

Discharge Location: 800 N. Westmoreland Dr., Lake Forest in Section 29 of Township 44 North, Range 12 East of the 4th P.M. in Lake County.

Name of Receiving Water: Three unnamed wetlands

Project Description: Road Entrance to Hospital

The Illinois Environmental Protection Agency (IEPA) has received an application for a Section 401 water quality certification to discharge into the waters of the state associated with a Section 404 permit application received by the U.S. Army Corps of Engineers. The Public Notice period will begin and end on the dates indicated in the heading of this Public Notice. The last day comments will be received will be on the Public Notice period ending date unless a commenter demonstrating the need for additional time requests an extension to this comment period and the request is granted by the IEPA. Interested persons are invited to submit written comments on the project to the IEPA at the above address. Commenters shall provide their names and addresses along with comments on the certification application. Commenters may include a request for public hearing. The certification and notice number(s) must appear on each comment page.

The attached Fact Sheet provides a description of the project and the antidegradation assessment.

The application, Public Notice/Fact Sheet, comments received, and other documents are available for inspection and may be copied at the IEPA at the address shown above between 9:30 a.m. and 3:30 p.m. Monday through Friday when scheduled by the interested person.

If written comments or requests indicate a significant degree of public interest in the certification application, the IEPA may, at its discretion, hold a public hearing. Public notice will be given 30 days before any public hearing. If a Section 401 water quality certification is issued, response to relevant comments will be provided at the time of the certification. For further information, please call Yacine Anane at 217/782-3362.

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Fact Sheet for Antidegradation Assessment
For Northwest Lake Forest Hospital
IEPA Log No. C-0418-12
COE Log No. 2013-17
Contact: Brian Koch; 217/782-0610
Public Notice Start Date: April 5th. 2013

The Applicant has applied for 401 water quality certification for construction of a transportation project between U.S. Route 41 and Westmoreland Road in the City of Lake Forest, Section 29, Township 44 North, Range 12 East, Lake County, Illinois. The purpose of the project is to provide a right in – right out road to facilitate access to the existing hospital complex. The project would include approximately 3,342 linear feet of improvements along U.S. Route 41 and approximately 607 linear feet of a new two-lane access road between U.S. Route 41 and Westmoreland Road.

Construction of the proposed project would result in a total of 0.6 acres of permanent fill impacts to three wetlands. Wetland "G" is considered to be a High Quality Aquatic Resource, therefore the 0.505 acres of impact would require a mitigation ratio of 3:1. The remaining 0.095 acres of impacts to the two low-quality wetlands would be mitigated for at a 1.5:1 ratio. The total acreage of mitigation credits required for the project is 1.66 acres. The applicant has proposed that 0.24 acres of their mitigation credit be conducted on-site through the management and enhancement of existing wetland (0.65 acres) and adjacent mature upland woods (1.75 acres) to be preserved on site (10% credit for the area being enhanced). The sites to be preserved, managed and enhanced include the higher quality portions of Wetland G. The Applicant proposes to purchase the remaining 1.42 acres of mitigation credit from the Atkinson Road Wetland Mitigation Bank, which is in the same watershed as the wetlands to be impacted.

Identification and Characterization of the Affected Water Body.

The three unnamed wetlands (herein referred to as "Wetland G", "Wetland H" and "Wetland J") to be permanently impacted by the proposed project are General Use waters with zero 7Q10 flow. Wetland G is a scrub/shrub and emergent wetland that is dominated by narrow-leaved cattail and purple loosestrife. The wetland is considered to be a High Quality Aquatic Resource due to its Floristic Quality Index (FQI) value of 29.4 and Native mean C value of 3.5. Wetlands H is a low-quality emergent wetland composed primarily of narrow-leaved cattail and blue flag (FQI = 12.5, C = 3.1), whereas Wetland J is a low-quality scrub/shrub wetland composed primarily of green ash, buckthorn, and panicled aster (FQI = 5.4, C = 2.4). The wetlands have not been assessed under the Agency's 305(b)/303(d) program and have not been given an integrity rating or been listed as biologically significant in the 2008 Illinois Department of Natural Resources publication Integrating Multiple Taxa in a Biological Stream Rating System. The wetlands are not enhanced in regards to the dissolved oxygen water quality standard.

Identification of Proposed Pollutant Load Increases or Potential Impacts on Uses.

Pollutant load increases that would be associated with this project include increases in suspended solids during construction activities and chloride from winter road salting of the new access road. Portions of the onsite wetlands would be permanently filled and would remove aquatic life uses. However, mitigation for these impacts would be provided by on-site restoration and through the purchase of mitigation credits from the Atkinson Road Wetland Mitigation Bank.

Fate and Effect of Parameters Proposed for Increased Loading.

The increase in suspended solids from construction activities would be local and temporary. Chloride increases from road salting of the access road would only occur seasonally. Predicted increases in suspended solids or chloride to the onsite wetlands are minimal and would have negligible impacts on aquatic life use. Given the topography and hydrology of project area and the BMPs to be employed onsite, runoff containing suspended solids and chloride would primarily be retained onsite.

Purpose and Social & Economic Benefits of the Proposed Activity.

The project purpose is to improve the safety and accessibility of vehicular traffic accessing the Northwestern Lake Forest Hospital. The project would benefit the public by improving traffic flow and reducing travel times for emergency and urgent care patients.

Assessments of Alternatives for Less Increase in Loading or Minimal Environmental Degradation.

The construction of the proposed project would follow guidelines set forth by the Agency and USACE which would minimize erosion and increases in suspended solids. Review of soil erosion and sediment control plans would be conducted by the McHenry-Lake County Soil and Water Conservation District, as would site inspections during construction. The Applicant has incorporated several elements into the structural design to minimize impacts to aquatic resources. A summary of these elements are listed below:

1. Minimization of wetland impacts: The proposed project location has been moved to the south to minimize the amount of wetland impacts and to avoid impacts to the higher quality areas of "Wetland G".
2. Preservation of existing mature woodland: The design for the road access preserves the mature woodland adjacent to "Wetland G" to the greatest extent practicable. Management of this woodland area is also proposed, which would remove invasive species and restore the forested areas impacted by the project.
3. Road design: The road has been designed to follow the existing topography and minimize the amount of material to be cut or filled. The road would be constructed during summer months under dry conditions and a double row of silt fence would be installed to minimize erosion and sediment transport.
4. Stormwater runoff minimization: The connector roadway has been designed with curb and gutter to minimize the amount of footprint and avoid cutting into the root zone of the mature woodland to be preserved. Stormwater runoff would be discharged at an upland location and through a designed treatment train of structural BMP's including a level spreader, settling basin, vegetated diversion, and a 350 feet long meandering vegetated swale before entering waters of the U.S. Runoff from the new access road would be collected in a trench drain and would bypass the preserved adjacent wetland. Stormwater would be discharged into a rip rapped area and subsequently into a vegetated swale. Approximately 2,000 linear feet of vegetated swales would be developed throughout the

entire project site, which would provide greater than 1.5 acres of filtration and water quality treatment along the roadsides. To minimize chloride increases from deicing of the new access road, the Applicant would adopt a deicing program that would reduce salt/sand use and environmental impacts while meeting the safety and mobility needs of emergency vehicles and acute care users. The August, 2005 handbook entitled *Minnesota Snow and Ice Control Field Handbook for Snowplow Operators* would be used as a guide for snowplow operators responsible for the maintenance of the new access road (http://www.mnltap.umn.edu/publications/handbooks/documents/snowice.pdf).

5. Hydrology: An oversized, earthen bottom culvert is included in the design to maintain connectivity and contiguity of aquatic resources and preserve the natural hydrology of the area.

Although unavoidable impacts are necessary to meet the goals of the project, impacts to wetlands and other natural resources have been minimized to the greatest extent practicable. Under the initial conceptual plan for the project, the access road was to be located further to the north which would have impacted 1.0-1.5 acres of wetlands, including a high quality portion of "Wetland G". Alternative conceptual plans to the north and south of the originally proposed location were developed to determine if impacts to natural resources could be minimized. It was determined that a southerly adjustment of the access road would minimize wetland impacts to the greatest extent while still achieving the goals of the project. The least intrusive alternative would be to not complete the project. This is not an acceptable alternative given that this is a useful project that would provide enhanced accessibility to the hospital.

Summary Comments of the Illinois Department of Natural Resources, Regional Planning Commissions, Zoning Boards or Other Entities.

The IDNR EcoCAT system was consulted on December 6, 2012. It was immediately determined that the following protected resources may be in the vicinity of the project location: Middle Fork Savanna INAI Site, Skokie River INAI Site, Middlefork Savanna Nature Preserve, Skokie River Nature Preserve, King Rail (*Rallus elegans*), Purple-Flowering Rasberry (*Rubus odoratus*), and Wilson's Phalarope (*Phalaropus tricolor*). The department evaluated this information and concluded that adverse effects are unlikely. Consultation was terminated in the December 7, 2012 letter from IDNR.

Agency Conclusion.

This preliminary assessment was conducted pursuant to the Illinois Pollution Control Board regulation for Antidegradation found at 35 Ill. Adm. Code 302.105 (antidegradation standard) and was based on the information available to the Agency at the time the assessment was written. We tentatively find that the proposed activity would result in the attainment of water quality standards; that all existing uses of the wetlands would be maintained offsite through compensatory mitigation; that all technically and economically reasonable measures to avoid or minimize the extent of the proposed increase in pollutant loading have been incorporated into the proposed activity; and that this activity would benefit the community at large by improving

vehicle access to the Northwestern Lake Forest Hospital. Comments received during the 401 Water Quality Certification public notice period will be evaluated before a final decision is made by the Agency.