

IEPA Log No.: **C-0587-13**

CoE appl. #: **2013-17**

Public Notice Beginning Date: **April 28, 2014**

Public Notice Ending Date: **May 19, 2014**

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
Division of Water Pollution Control
Permit Section
1021 North Grand Avenue East
Post Office Box 19276
Springfield, Illinois 62794-9276
217/782-3362

Name and Address of Discharger: Northwestern Lake Forest Hospital, 660 N. Westmoreland Road,
Lake Forest, IL 60045

Discharge Location: Section 30, T44N, R12E of the 3rd P.M. in Lake County within Lake Forest

Name of Receiving Water: Unnamed Wetlands

Project Description: Construction of new 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 Thaddeus Faught at 217/782-3362.

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Fact Sheet for Antidegradation Assessment
Northwestern Lake Forest Hospital – Unnamed Wetlands – Lake County
IEPA Log # C-0587-13
COE # LRC-2013-17
Contact: Diane Shasteen (217) 558-2012
April 28, 2014

Northwestern Lake Forest Hospital (NLFH, “Applicant”) has applied for a 401 Water Quality Certification for the proposed impact to 2.89 acres of jurisdictional wetlands within the designated project area. The project area is located at 800 North Westmoreland Drive, near U.S. Route 41 and Westmoreland Drive in the North Branch Chicago River Watershed of the City of Lake Forest, Lake County, Illinois. A new state-of-the-art replacement hospital will be constructed on the existing 160 acre NLFH campus. The purpose of this project is to replace the obsolete NLFH facility which was built in the 1940’s and 50’s. NLFH services all of Lake County, northern Cook County, and southern Wisconsin; a new facility is critical to continued delivery of care to local residents. Construction of the proposed hospital would result in the filling of 2.89 acres of jurisdictional wetlands, which will be replaced by obtaining and dedicating 0.97 acres of wet-mesic prairie to the Hybernia Nature Preserve. The project will incorporate comprehensive stormwater BMPs to replace the water quality and stormwater treatment function of the wetlands proposed for impact by the new construction.

Identification and Characterization of the Affected Water Body.

The Applicant identified ten wetlands (A-J) within the project area. The wetlands on the NLFH campus appear to be the result of stormwater runoff entering the site from surrounding areas. Only two wetlands (B, E) will be permanently impacted by the project. Both are considered COE jurisdictional and have a hydrologic connection to the North Branch of the Chicago River (Skokie River sub-watershed). Wetland B is identified as a Scrub/Shrub Emergent wetland consisting of 2.73 acres of high quality aquatic resource (HQAR), meeting this designation with a floristic quality (FQI) of 21.7. This wetland is not considered a remnant high quality natural area or ADID wetland and its main functions are stormwater storage and water quality treatment for area runoff. Wetland E, 0.157 acres, is considered an Emergent low quality wetland (FQI 11.8). Aerial photos from the late 30’s to present indicate that the entire site has been in row crop agriculture in the past.

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

Several temporary soil erosion and sediment control plans will be implemented before and during the construction process to alleviate potential impacts to onsite wetlands. A few of these measures include a silt fence outside the limits of grading and outside the soil stockpile, erosion control blankets on interior detention basin side slopes, swale areas, and other disturbed areas, and a temporary overland diversion swale. Due to the implementation of these plans, no pollutant load increases are expected with this project. The project will eliminate 2.89 acres of jurisdictional wetlands.

Fate and Effect of Parameters Proposed for Increased Loading.

Originally, the Applicant proposed purchasing 8.426 acres of compensatory wetland mitigation credits from the Atkinson Road Bank; the result of a 3.0 to 1 mitigation ratio applied to Wetland B and a 1.5 to 1 mitigation ratio to Wetland E. Based on a January 2014 revision, the 2.89 acres of permanently impacted wetlands (B & E) are proposed to be mitigated through the acquisition and preservation of

high quality aquatic resources by dedicating three in-held lots and a roadway proposed for development (0.97 acres) to the Hybernia Nature Preserve. The proposed dedication would preserve and manage the area in perpetuity as part of the surrounding nature preserve, preserving the sites themselves and forgoing secondary impacts to the surrounding nature preserve that would accrue from development. The areas proposed for dedication are located contiguous to the Highmoor Park Nature Preserve and adjacent to the Hybernia Nature Preserve and consist of wet-mesic “black soil” prairie (FQI 46.9) with 215 known plant species including the Federally-threatened eastern prairie fringed orchid.

The Illinois Nature Preserve Commission:

“recommends dedication of the 0.97 acres as a nature preserve addition to Hybernia Nature Preserve. The importance of protecting these three lots for the long-term viability of the nature preserve and to an extant population of the eastern prairie fringed orchid cannot be overstated. Protection of these in-holdings has long been recognized a priority.”

The proposed dedication area is considerably less acreage than the original proposed mitigation; however, the location, high quality nature, presence of federally and state listed species, and numerous agencies in support of the dedication make this proposal acceptable for mitigation. The applicant also will implement over 20 acres of BMPs in the new construction including permeable pavement, vegetated swales, a naturalized detention basin, vegetated overland flow paths, wetland and wet bottom detention, and perimeter native plantings to reduce pollutants loads, provide stormwater storage, and maximize infiltration and evaporation.

Purpose and Social & Economic Benefits of the Proposed Activity.

NLFH is a not-for-profit healthcare provider and the largest provider of charity care in Lake County. Construction of the new hospital allows the continued delivery of care to local residents in Lake County, northern Cook County and southern Wisconsin. The new facility will be adaptable, efficient and sustainable and will meet the changing needs of healthcare in the community.

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

The applicant has gone through an extensive planning process that started in 2006 assessing facility issues, identifying main hospital building and code deficiencies, and contemplating campus revitalization. The following alternative building solutions were proposed and analyzed and presented to the Illinois Health Facilities and Services Review Board as part of the required Certificate of Need application.

Renovate/modernize the existing hospital

This alternative would require building additions with new patient rooms, reconstructing all inpatient, outpatient, and support spaces, and upgrading all utilities. This alternative was rejected due to the disruption in patient care, longer timeline than new construction, and the inadaptability to evolving state of the art care delivery.

Build a replacement hospital on another site

This alternative would require finding a site suitable for a full service hospital with adequate access and space for other buildings that provide services to the hospital and not conflict with other hospital service providers. Only one off-site location, the 44-acre hospital on the Northwestern Grayslake campus, was found to be suitable for the community that NLFH serves. This alternative would result in a discontinuation of services in Lake Forest, a disruption in Grayslake operations, and conflict with existing operations and building design of the Grayslake facility. Demand and local need expressed by Lake Forest residents and surrounding communities served by NLFH was also a factor in rejecting this alternative.

Replace the current hospital on the existing NLFH campus

This option proposes a new facility with modern diagnostic and treatment services that support inpatient and outpatient care. The hospital would include a medical office wing to accommodate 60 physicians, outpatient clinical areas, space for teaching, and the re-use of the current hospital buildings. This project would avoid disruption of services and deliver a higher standard of care that cannot be accomplished in the current facilities. This option was determined to be preferred, however, four different designs were considered before the final option was approved.

Option A: This option was located in a farmed parcel known as Parcel 4. This plan was rejected because the proposed building location would violate the 35 feet height restriction and the buffer requirements, setbacks, and access limitations for the properties to the west of Waukegan Road. Due to the height limitations, the design would be a scattered building layout that would be inefficient for patient treatment and care, increase corridor travel times between destinations, and would maximize the footprint of the buildings. This proposed plan would have resulted in a total impact to Wetland B.

Option B: The second concept plan provided the hospital structure to be located to the east of Parcel 4 with parking located in the area with known height limitations. Several design and efficiency requirements were not met in this plan. The proposal would have resulted in a large area of disturbance and total impact to Wetland B.

Option C: This option, which would minimize the building footprint, reduce traffic and parking for medical offices, provide efficient mobility from parking lots to service areas, reuse twelve acres of existing parking lot area, and implement several BMPs, was presented to the USACE and USFWS at a pre-application meeting. This proposal had a total impact to Wetland B and E. Wetland E would be replaced due to local buffer requirements and the desire for landscape screening requested by residents in the subdivision to the south.

Option D: This is the preferred option for the NLFH project. It includes the design of Option C plus additional BMPs requested by the USACE. The site plan was revised to include vegetated swales within the existing parking lot and permeable pavement in the western parking lot and main entrance to the hospital. This proposal would also have a total impact to Wetland B and E, however through the created natural areas and BMP treatment train designed for the project, water quality benefits and water runoff volume reduction requirements would be met. Off-site drainage areas entering the project sites would be enhanced with the creation of overland flow paths with native plantings on the western portion of the campus and high floristic quality and vegetative diversity are proposed through native plantings zones over the site and are protected through a management and monitoring plan established

for the site. Temporary soil erosion and sediment control measures are in place for pre- and during construction as well as the permanent BMP measures.

Conclusion:

The construction of the proposed project will follow conditions set forth by the Agency and USACE. The placement of the new construction is the most cost effective, viable means for replacing the current hospital on the NLFH campus. A treatment train of best management practices would be employed to maintain the existing hydrology, slow and dissipate energy of sediment, increase water quality filtration and infiltration and provide a sustainable, permanent native vegetative cover which will minimize pollutants loads, provide stormwater storage, and maximize evaporation.

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

An Eco-CAT endangered species consultation submitted on July 15, 2013 to the Illinois Department of Natural Resources resulted in the identification of several terrestrial threatened or endangered species residing in the area of the proposed hospital. IDNR has evaluated the EcoCAT information and concluded that adverse effects to endangered species are unlikely and terminated consultation for IDNR Project #1400467 on July 16, 2013.

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 draft 401 Water Quality Certification was written. We tentatively find that the proposed activity will result in the attainment of water quality standards; 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 will benefit the community at large by providing new state of the art hospital facilities and care for the people of Lake County and the surrounding area. Comments received during the 401 Water Quality Certification public notice period will be evaluated before a final decision is made by the Agency.