

Information for File #2015-04399-RJH

Applicant: Aurora Bay Area Medical Center

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Primary County: Marinette

Location: Section 13, Township 30 N, Range 23 E

Information Complete On: 1-13-2016

Posting Expires On: 2-22-2016

Authorization Type: Section 404 Letter of Permission

This application is being reviewed in accordance with current practices for documenting Corps jurisdiction under Section(s) 9 & 10 of the Rivers and Harbor Act of 1899 and Section 404 of the Clean Water Act.

We have made a preliminary determination that the aquatic resources that would be impacted by the proposed project are subject to Corps of Engineers jurisdiction under Section(s) 9 & 10 of the Rivers and Harbors Act of 1899 and/or Section 404 of the Clean Water Act. If an approved jurisdictional determination is completed as part of the review process for this application, a copy will be posted on the St. Paul District web page at the following link: <http://www.mvp.usace.army.mil/Missions/Regulatory.aspx>.

PROJECT DESCRIPTION AND PURPOSE: The Aurora Bay Area Medical Center has applied for a Department of the Army permit to discharge dredged and fill material into waters of the United States to construct a new medical facility. The purpose of the project is to improve existing services and provide additional services to meet demands of the surrounding region.

NAME, AREA AND TYPES OF WATERS (INCLUDING WETLANDS) SUBJECT TO LOSS: Approximately 0.337 acres of wet meadow wetlands, 0.005 acres of sedge meadow wetlands, 0.845 acres of shallow marsh wetlands and 0.113 acres of forested wetlands would be permanently filled as a result of the proposed facility construction project.

ALTERNATIVES CONSIDERED: Three layout alternatives in addition to the preferred alternative were assessed during the project concept and programming phase. All considered alternatives utilized the same building footprint and parking count in order to ensure a valid comparison between options. Modification of building orientation and location, parking areas, and site maintenance access were considered in the alternatives.

A no-build alternative would avoid impacts to wetlands; however the alternative was eliminated by the applicant because it failed to address the need and purpose of the project. Additional alternatives considered and dismissed include:

- Alternative 1 was the initial desired layout of the hospital complex. Proximity to the street allows for easy access and optimal sight lines for approaching traffic to view the facility. The parking configuration puts the maximum number of stalls near the building, while still allowing ample room for future building expansion. In addition, keeping the building near the roadway greatly reduces the cost for extending utilities to serve the site, and reduces the number of utility structures needed on site. However, permanent wetland impacts associated with this alternative would be 6.43 acres, which is substantially more than the applicant's preferred alternative.
- Alternative 2 shifts the building and site improvements away from the road to avoid the largest wetland impacts, but still maintains a uniform orientation throughout the parking areas. In this alternative the parking distribution around the building is maintained relatively evenly distributed. Drainage patterns needed to provide treatment for runoff from the paved areas would result in some fill for the site, but not as much as for the preferred alternative. This results in a lower construction cost. The helipad in this alternative is located across the looped driveway from the building, which is not preferred by the hospital. Permanent wetland impacts associated with this alternative would be 2.98 acres, which is significantly less than Alternative 1, but still higher than the preferred alternative.
- Alternative 3 closely resembles the preferred alternative, except that the southern looped access drive follows a straight alignment along the building, and is located approximately 200 feet away from the south face of the building. This alignment provides room for expansion of the building to the south without impacting the parking lot or access road constructed as part of this project. Building orientation to avoid wetlands places some portions of the lots far from the building. Permanent wetland impacts associated with this alternative would be 1.46 acres, which is greater than the preferred alternative.

The alternatives, stated above, were eliminated by the applicant because these alternatives would significantly increase the wetland impacts and cost of the project.

The applicant's preferred alternative shifts the location of the southern loop access drive and brings both this driveway and the parking lot closer to the building. This minimizes the wetland impacts occurring now, with a potential for additional future impacts when the hospital is ready to expand. As in Alternative 3, the building orientation and location minimizes wetland impacts, and although the parking is less convenient for building access, it preserves the maximum wetland area and provides views to these areas from many places in the building. To provide traffic flow around the entire building, with service areas in the rear, several small wetlands would be impacted. 1.3 acres of

permanent wetland impacts would occur as a result of this alternative, which is the least of all alternatives.

ALTERNATIVE LOCATIONS CONSIDERED: Three location alternatives in addition to the current location were assessed during the project concept and programming phase. All considered alternatives were rejected by the applicant because either they (1) impacted more wetlands than the proposed site plan, (2) were not large enough to accommodate the desired facility, (3) encountered zoning complications, (4) landowners were not willing to sell the identified parcels, or (5) were too costly. Additional location alternatives considered and dismissed include:

- Land along Cleveland Avenue (5 parcels owned by three different parties) – this vacant land is located on Cleveland Avenue immediately west of US41. It is split between the City of Marinette and Town of Peshtigo. The site was rejected by the applicant as a possible location alternative because:
 - o Large portions of the 55-acres site contains wetlands. The two areas without wetland are isolated from each other, each of which is not large enough to accommodate the new hospital without impacting more wetlands than the proposed plan on the University Drive parcel;
 - o A city-owned parcel containing a water tower effectively bisects the site making developments fragmented and more costly;
 - o The asking price for one of the key parcels in the grouping is prohibitively expensive.

- Land adjacent to property owned by Aurora Medical Group (11 parcels owned by 7 different parties)- this land is located along Old Peshtigo Road just south of US41 and is split between the City of Marinette and the Town of Peshtigo. Since no single parcel in this group is large enough to accommodate the new facility, several combinations of adjacent parcels were considered. The area includes a large wetland region as well as topographical and environmental challenges. Although its location adjacent to an existing Aurora facility was desirable, the adjacent land was rejected by the applicant as a possible alternative because:
 - o Access to the 31- acre site is compromised by the railroad to the north as well as non-adjacency to the major roadway- Roosevelt Road;
 - o It is not large enough to accommodate the new hospital and preserve room for future expansion;
 - o The City was using a portion of the site to dump dredged material, which would not be suitable to be used as fill on the site and would require off-site disposal. This would increase developmental cost on the site;
 - o Large wetland areas exist on the parcel that would be impacted by the development in an amount similar to or exceeding the preferred parcel.

- Land along Roosevelt Road (two parcels with a single owner) - this parcel is located at N2992 Roosevelt Road, immediately west of the preferred parcel along

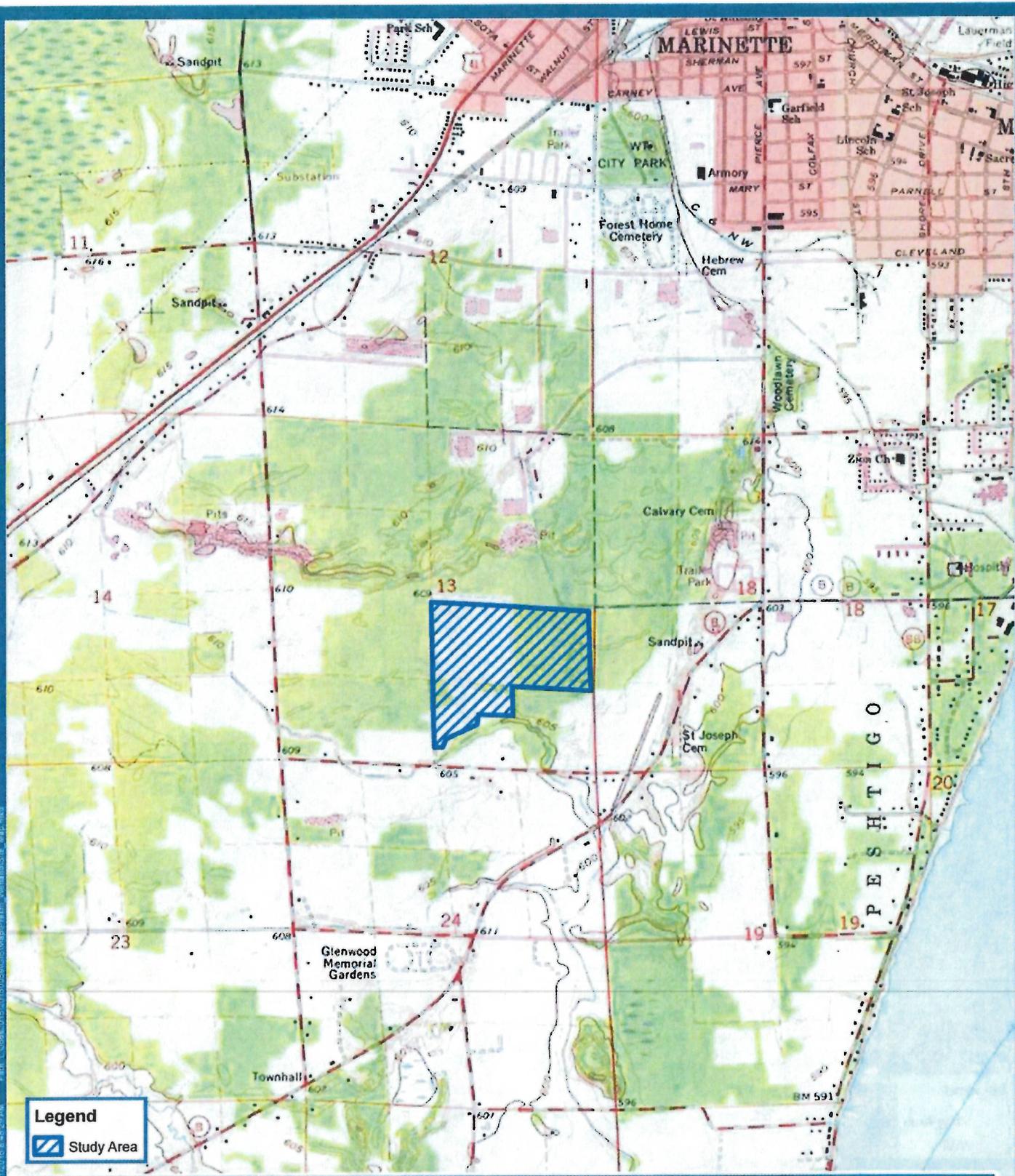
University Drive in the Town of Peshtigo. The Roosevelt Road site was rejected by the applicant as a possible alternative because:

- Wisconsin Wetland Inventory mapping indicated the presence of several wetlands, with a high likelihood that more or larger areas would be identified during a formal delineation. The site would not accommodate the new hospital without impacting at least as many wetlands as the proposed plan on the University Drive parcel;
- No public utilities serve the parcel. This parcel is farther away from the nearest sanitary sewer line with depth to accommodate the site, resulting in a significant cost to provide the required service;
- The owner of the site was unwilling to sell the property.

AVOIDANCE AND MINIMIZATION: During the design process, the facility layout was drafted different ways in order to reduce wetland impacts. The applicant also proposed 3 different locations for the facility to be built to minimize wetland impacts. The applicant also proposes to implement erosion control best management practices to minimize potential impacts to undisturbed wetlands.

COMPENSATORY MITIGATION: A wetland mitigation plan is currently being drafted by the applicant to compensate for all unavoidable adverse impacts to wetlands. The draft plan includes purchasing credits through the Wisconsin Wetland Conservation Trust In-lieu Fee Program.

DRAWINGS: See attached.



Legend
 Study Area

N
 0 500 1,000 2,000
 Feet
 1 in = 2,000 ft

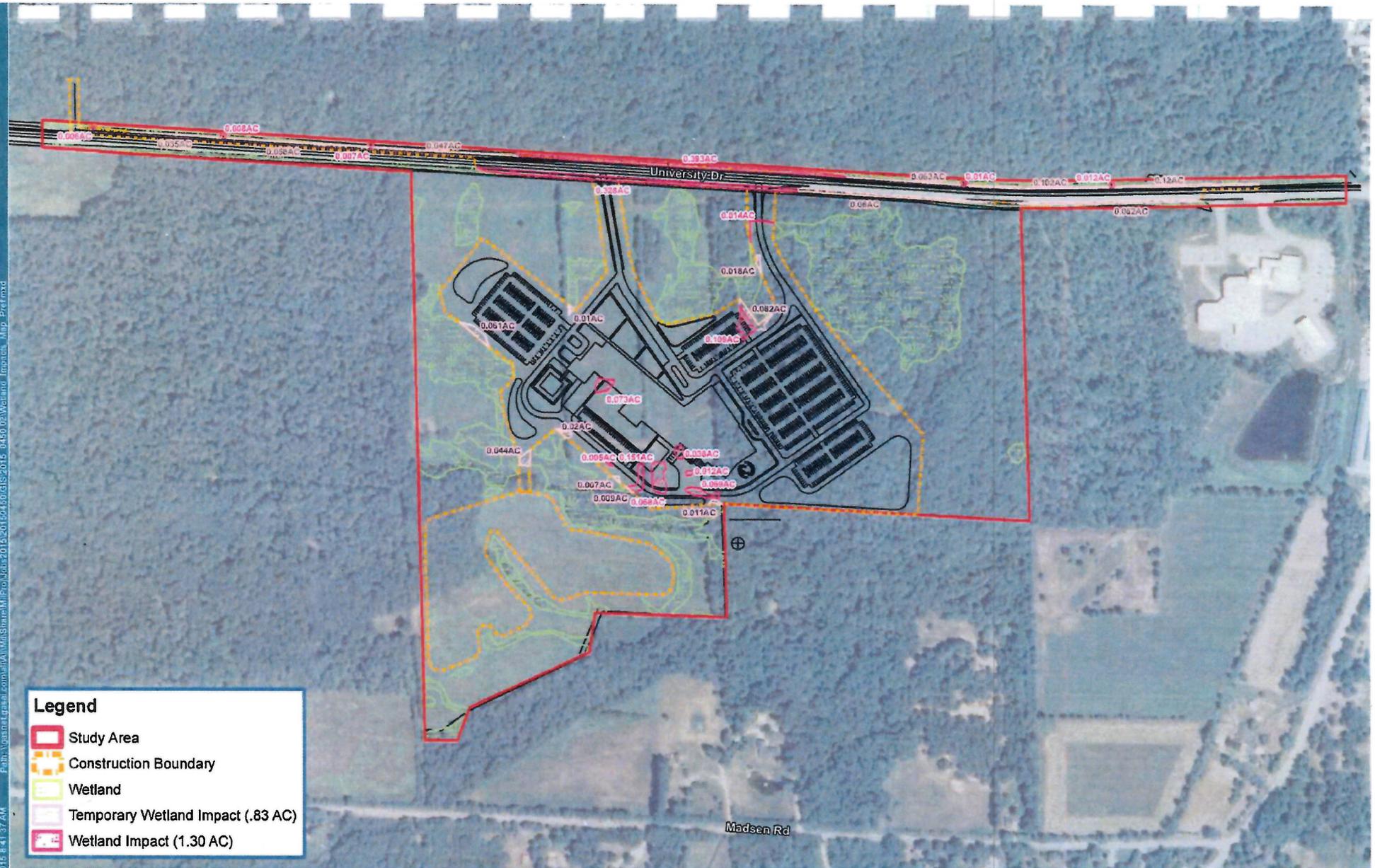
SITE LOCATION MAP
WETLAND DELINEATION
 MARINETTE COUNTY, WISCONSIN

FIGURE NO. 1



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Legend

- Study Area
- Construction Boundary
- Wetland
- Temporary Wetland Impact (.83 AC)
- Wetland Impact (1.30 AC)

0 125 250 500
Feet

N

1 in = 525 ft

**WETLAND IMPACT PERMIT APPLICATION
AURORA BAY AREA MEDICAL CENTER REPLACEMENT HOSPITAL**

**WETLAND IMPACTS MAP: PREFERRED
MARINETTE COUNTY, WISCONSIN**

FIGURE # B-1

