



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY  
REGION 5  
77 WEST JACKSON BOULEVARD  
CHICAGO, IL 60604-3590

MAR 09 2016

REPLY TO THE ATTENTION OF: E-19J

Julie Johnston  
Area Engineer  
Federal Highway Administration  
315 West Allegan Road, Room 201  
Lansing, Michigan 48933

Aaron Johnson, P.E.  
Manager, Ishpeming Transportation Service Center  
Michigan Department of Transportation  
Ishpeming TSC  
100 South Westwood Drive  
Ishpeming, Michigan 49849

**Re: Scoping Request for City of Marquette – Hospital Relocation Study, Marquette, Michigan**

Dear Ms. Johnston and Mr. Johnson:

The U.S. Environmental Protection Agency has received the scoping request for the above-mentioned project, dated January 22, 2016. Our comments are provided pursuant to the National Environmental Policy Act (NEPA), the Council on Environmental Quality's NEPA Implementing Regulations (40 CFR 1500-1508), and Section 309 of the Clean Air Act.

The City of Marquette (City) is preparing analysis connected to the proposed transportation system improvements related to the relocation of the Marquette General Hospital (MGH). The relocation is planned, from its existing location on West College Avenue, to a proposed site on West Baraga Avenue. Potential activities associated with MGH's relocation are roadway relocations and access improvements between MGH and US-41/M-28. Potential improvements include new hospital drive accesses onto US-41/M-28, Baraga Avenue, and Washington Street; a bridge carrying Grove/7<sup>th</sup> Street over US-41/M-28; intersection upgrades; widening of 7<sup>th</sup> Street; and re-alignment of local roads. While some of these potential activities will be undertaken under the purview of Michigan Department of Transportation (MDOT), road access may fall under the purview of Federal Highway Administration (FHWA). Based on FHWA's participation in the proposed project, we anticipate a NEPA document will be prepared.

Pursuant to our review of the scoping request letter and attached map of the study area, we have the following comments to aid in the preparation of future NEPA documentation. Our comments are categorized by topic.

**Purpose and Need/Alternatives**

EPA recommends the forthcoming EA clearly describe the problem(s) that needs to be addressed by any roadway relocations or access point reconfigurations. NEPA documentation should identify alternatives considered but dismissed from further consideration, if applicable, and provide elimination criteria and clear explanations for elimination.

### **Project Features**

EPA recommends FHWA consider the use of recycled materials for roadways. Some options to consider include:

- Use recycled materials to replace carbon-intensive Portland Cement in concrete as “supplementary cementitious material.”
- Use recycled materials in pavement applications, such as crushed recycled concrete, recycled asphalt pavement, and rubberized asphalt concrete. Also, in some circumstances, on-site asphalt can be re-used (e.g., cold in-place recycling or full depth reclamation).

### **Aquatic Resources**

Based on preliminary analyses, a stream runs from the northwest corner to the southeast of the study area. If proposed road alterations impact the stream, we recommend NEPA documentation discuss direct and indirect impacts to regulated aquatic resources. Examples of indirect impacts include: runoff, contamination, sedimentation, or changes to hydrology of the remaining portions of wetlands, rivers, and streams. Lastly, we recommend discussing any proposed mitigation, including mitigation sequencing per the CWA Section 404(b)(1) guidelines.

While we offer these comments to inform the Draft EA, EPA reserves its right to provide additional comments regarding this project if it is later determined that a CWA Section 404 permit will be needed.

### **Water Quality**

If the study area is converted to roadways associated with a relocated hospital, sediment loading is likely to increase as impervious surfaces increase. This will increase the amount of stormwater runoff that will need to be collected and stored before natural infiltration can fully occur. NEPA documentation should consider future, more intense and frequent rainfall events in modeling and designing its stormwater management plan.

### **Air Quality and Diesel Emissions Reduction**

While EPA recognizes that Marquette County is an attainment area for all criteria pollutants, we expect construction equipment used during the proposed project to emit diesel emissions. The National Institute for Occupational Safety and Health has determined that diesel exhaust is a potential occupational carcinogen, based on a combination of chemical, genotoxicity, and carcinogenicity data. In addition, acute exposures to diesel exhaust have been linked to health problems, such as eye and nose irritation, headaches, nausea, asthma, and other respiratory system issues. Although every project is unique, common actions can reduce worker exposure to diesel exhaust as well as reduce air impacts.

EPA strongly recommends the NEPA documentation include the following diesel emissions reduction measures, as applicable, and commit to these reductions in the decision document:

- using low-sulfur diesel fuel (less than 0.05% sulfur);

- retrofitting engines with an exhaust filtration device to capture diesel particulate matter before it enters the construction site;
- positioning the exhaust pipe so that diesel fumes are directed away from the operator and nearby workers, thereby reducing the fume concentration to which personnel are exposed;
- using catalytic converters to reduce carbon monoxide, aldehydes, and hydrocarbons in diesel fumes. These devices must be used with low sulfur fuels;
- using enclosed, climate-controlled cabs pressurized and equipped with high efficiency particulate air (HEPA) filters to reduce the operators' exposure to diesel fumes. Pressurization ensures that air moves from inside to outside. HEPA filters ensure that any incoming air is filtered first;
- regularly maintaining diesel engines, which is essential to keeping exhaust emissions low. Follow the manufacturer's recommended maintenance schedule and procedures. Smoke color can signal the need for maintenance. For example, blue/black smoke indicates that an engine requires servicing or tuning;
- reducing exposure through work practices and training, such as turning off engines when vehicles are stopped for more than a few minutes, training diesel-equipment operators to perform routine inspection, and maintaining filtration devices;
- purchasing new vehicles that are equipped with the most advanced emission control systems available; and
- with older vehicles, using electric starting aids such as block heaters to warm the engine reduces diesel emissions.

### **Hazardous Waste and Brownfields Sites**

Based on a review of the geodatabase, NEPA Assist, several facilities identified as Resource Conservation and Recovery Act (RCRA) sites and one brownfield site are located in the study area (see enclosed Proposed Marquette GH Site). The brownfield site is identified as Roundhouse Property. The eastern RCRA facilities indicated in the study area of the enclosed map include Cbb Superior Collision Inc. and a City of Marquette facility. The middle RCRA facilities include Marquette Public Service and Waste Management of Michigan. The western RCRA facilities include Action Publications Inc., Choice Motors, Cook Sign, and Walgreen Co. We recommend the NEPA documentation demonstrate that FHWA has determined whether RCRA or brownfield facilities will be impacted by proposed road alterations.

### **Federally- and State-Listed Species/Wildlife**

U.S. Fish and Wildlife Service (USFWS) recently introduced a project planning tool that streamlines the USFWS environmental review process, known as IPAC – Information for Planning and Conservation.<sup>1</sup> EPA recommends FHWA use this tool to request a trust resource report covering Federally-proposed, candidate, threatened, and endangered species; critical habitat; migratory birds protected by the Migratory Bird Treaty Act; and National Wildlife Refuges that could be impacted, positively or negatively, by the proposed project. Coordination with USFWS regarding trust resources should be described in the NEPA documentation;

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<sup>1</sup> <https://ecos.fws.gov/ipac/>

Coordination with the MDNR should occur to determine if any state-listed species are present within the project boundaries, and if the proposed project could impact, positively or negatively, any listed species. As mentioned above, coordination efforts with MDNR should be described in the NEPA documentation;

The Fish and Wildlife Coordination Act<sup>2</sup> (FWCA) requires that agencies consult with USFWS and state wildlife agencies concerning the conservation of wildlife resources where the water of any stream or other water body is proposed to be controlled or modified by a Federal agency or any public or private agency operating under a Federal permit. Coordination concerning the FWCA should be described in the NEPA documentation.

### **Historic, Architectural, Archaeological, and Cultural Resources**

Coordination with the Michigan State Historic Preservation Office regarding designated listed/eligible property on the National Register of Historic Places within the vicinity of the project area should be described in the NEPA documentation.

### **Cumulative Impacts**

While EPA recognizes the proposed project includes road alterations associated with a larger hospital relocation, it is reasonable to expect that cumulative impacts to resources, particularly aquatic resources, can occur as a result of the proposed project. We recommend cumulative impacts to resources resulting from induced growth associated with proposed road alterations (e.g., additional parking areas, medical offices, associated businesses) be analyzed in the forthcoming NEPA documentation. In assessing cumulative effects, the key determinant is whether the incremental effect of the proposed action will alter the sustainability of resources when added to other present and reasonably-foreseeable future actions.

### **Green Infrastructure**

We encourage MGH to follow recommendations set forth by Titles III, IV, and V of the Energy Independence and Security Act of 2007, and Executive Order 13514, Federal Leadership in Environmental, Energy, and Economic Performance (LEED). For new structures, we encourage the use of environmentally-sustainable building materials, such as permeable pavement<sup>3</sup> for parking areas and loading zones, paints low in volatile organic compounds, energy-efficient lighting, motion-sensored lighting, water efficient fixtures, and Energy Star-certified products, where feasible.

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<sup>2</sup> 16 U.S.C. §§661-666c; PL 85-624

<sup>3</sup> Recent studies in northern climates have indicated that permeable pavement is often less expensive than traditional concrete and storm sewer use, requires no special maintenance, and is not as susceptible to freeze-thaw cycles compared to traditional concrete, if built correctly. For a great example of a permeable pavement project, see the Morton Arboretum's answers to commonly-asked technical questions, at: [http://www.mortonarb.org/images/stories/pdf/our\\_work/main\\_parking\\_lot.pdf](http://www.mortonarb.org/images/stories/pdf/our_work/main_parking_lot.pdf)

Recent studies have indicated that installing “green” stormwater systems is often more cost efficient than traditional “gray” stormwater systems.<sup>4</sup> We strongly encourage on-site green stormwater management via use of bioswales.

We appreciate the opportunity to provide input early in the decision-making process. If you have any questions, feel free to contact me or Kathy Kowal of my staff at [kowal.kathleen@epa.gov](mailto:kowal.kathleen@epa.gov) or 312/353-5206.

Sincerely,



Kenneth A. Westlake  
Chief, NEPA Implementation Section  
Office of Enforcement and Compliance Assurance

cc: Dennis M. Stachewicz, Jr., City of Marquette  
Wes Butch, DLZ Michigan, Inc.

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<sup>4</sup> See *Reducing Stormwater Costs through Low Impact Development (LID) Strategies and Practices* at: <http://www.epa.gov/owow/NPS/lid/costs07/documents/factsheet-reducingstormwatercosts.pdf>

