



May 22, 2015

Mr. Jess Barley
Sr. Staff Project Manager- Hospitality
Kohler Co.
444 Highland Drive MS 201
Kohler, WI 53044

Subject: Initial Review of the April 2015 Environmental Impact Report for Proposed Golf Course – Town of Wilson, Sheboygan Co.

Dear Mr. Barley:

Thank you for the April 2015, Environmental Impact Report (EIR) for the Proposed Golf Course – Town of Wilson, Sheboygan Co. describing Kohler's proposed 18-hole golf course development on 247 acres of Kohler-owned property between the Black River and Lake Michigan, north and east of Kohler-Andrae State Park.

The Department has completed our review of the information provided in the EIR. As we have discussed with you, the purpose of the EIR is for an applicant to provide information to help the Department fully understand the proposed project and to provide sufficient details to allow us to prepare our Draft Environmental Impact Statement (EIS).

Based on our preliminary review, program staff identified a number of areas where there are questions or where we would like additional information to better understand the proposal and potential impacts. Please note that the permitting processes required for the project may involve other information that could be beyond the scope of the EIS document.

An initial list of the topics/information requests by program area is provided below. In some cases, information for one topic area may also be needed to assess potential impacts in another topic area. We look forward to meeting with you and your consultants to discuss these topics and what additional information Kohler could provide.

Archeological/Historical (Confidential)

1. Since these reports require confidentiality, please provide completed cultural resource investigation reports when they become available under a separate cover. Please include two hard copies as well as a disc/pdf copy. *Sections 3.3.4 and 4.3.4.*

Natural Heritage Conservation (Confidential)

1. Since these reports require confidentiality, please provide copies of the *Stantec Technical Memo Botanical Survey* and *Stantec Technical Memo Beach-dune Tiger Beetle Survey* reports referenced in *Sections 3.2.4 and 3.2.5* under a separate cover. Please include two hard copies.
2. Discuss aquatic habitat in Lake Michigan and potential impacts to rare species. *Sections 3.2.2 and 4.2.2.*
3. Define and describe "replacement habitat" in *Section 4.2.4.*

4. The terms “beach” and “dune” appear to be used interchangeably in some sections, however they refer to different habitat types. Clarify the impacts to dunes versus beaches discussed in Sections 4.2.1, 4.2.4, 4.3.5., and 5.1.1. Provide an estimate of the area/number/types of trees to be removed and discuss the impact this will have on the beach/dune community.
5. Describe how the proposed plan will avoid and minimize impacts to beach-dune tiger beetle populations.

Waterways & Wetlands (including Dam and Floodplain Management):

Wetlands

1. Provide an updated exhibit showing wetlands and the locations of proposed golf course facilities including specific hole locations, entrance road, parking lots, clubhouse, maintenance buildings, caddie/cart barn, cart paths, on-course rest stations, septic and irrigation systems, irrigation lines, storm water facilities, and utilities. *Figure 6: Wetland Delineation and Flood Plain Map and Figure 9E: Preferred Alternative.*
2. Provide a narrative or tabular description of potential wetland impacts (acreage by wetland type) for the proposed golf course facilities including but not limited to caddie/cart barn, cart paths, on-course rest stations, septic and irrigation systems, irrigation lines, storm water facilities, and utilities. *Section 2.4.*
3. Have a wetland delineation completed for the Kohler-Andrae State Park property where the access road, maintenance building, utilities and any other proposed development on state park land is to be located. Once the delineation has been completed, provide a narrative or tabular description of potential wetland impacts (acreage by wetland type) for the proposed facilities on state land.
4. Provide an exhibit showing the wetlands in the location of the pond and where spoils from the irrigation pond will be placed and if there will be resulting impacts to wetlands for the disposal of the spoils – *Figure 6 Wetland Delineation.*
5. Discuss potential secondary wetland impacts from tree removal, upland grading, equipment access, and cart path/utility installation on steep slopes adjacent to wetlands. *Section 4.2.3.*
6. Discuss construction access and temporary impacts to wetlands that cannot be avoided. *Section 4.5.*
7. Assess if special techniques are required to construct the access road near the Black River and muck soils. *Section 2.3.4.*
8. Discuss how the specific aspects of the proposed project will affect any interdunal, ridge and swale wetlands or seep wetlands. The analysis should include direct secondary and cumulative impacts. *Section 4.6.*
9. Provide a detailed summary of the vegetation sampling efforts in 2014 which recorded 288 plant species and mapped 13 plant communities on Kohler and State Park property. *Section 3.2.*
10. Clarify if proposed public use of the golf course will include hiking, birdwatching and cross country skiing in addition to golfing and dining. *Section 4.3.1.*
11. Related to the information in the “Wildlife” section below, describe how changes to forest habitat will affect any wetlands including any secondary impacts of grading and tree removal adjacent to wetlands. *Section 5.1.1.*
12. Provide information about the potential impacts to wetlands from soil borrow sources including information regarding the amount of topsoil required, sources of topsoil, sources of clay for pond liners, equipment access to place topsoil, and soil stockpile locations.
13. Provide information about the potential secondary impacts to wetlands from placement of topsoil for tees, green and fairways adjacent to wetlands.
14. Please provide information on the quality and functional value of each of the wetland areas proposed to be filled.
15. Please explain how the proposed mitigation would replace the type and function of the wetlands proposed to be impacted.

Waterways

1. Exhibits showing ordinary high water marks (OHWM) for the Black River and Lake Michigan will be needed for the EIS.
2. Indicate if work is proposed below the OHWM of the Black River or Lake Michigan. *Section 3.2.2.*
3. What types of river bank stabilization will be needed for the entrance road near the Black River? *Sections 4.1.4 & 4.2.2*
4. Provide utility layout information and indicate if utilities will be installed in/near the Black River.
5. Discuss the view corridor and describe proposed changes including tree removal along the lakeshore. Provide visual representations. Discuss Sheboygan Co. shoreland clear cutting standards. Discuss how building setback and vegetation removal will affect natural scenic beauty. *Section 4.3.5.*

Floodplain

1. Provide a revised exhibit showing all proposed golf course facilities, access roads, utilities, and bridges related to the floodplain and floodway and quantify the amount of fill proposed to be placed in the floodplain of both the Black River and Lake Michigan. *Figure 6 Floodplain Map*
2. Detailed bridge design for crossing of the Black River addressing traffic operations and capacity, hydraulics, regional flood elevation, and aquatic habitat connectivity.
3. Has any modelling of changes to the floodplain elevation been conducted using the Hydrologic Engineering Centers River Analysis System (HEC-RAS)? *Section 3.1.5.*
4. The proposed access road is in the floodway and shoreland-wetland. Analyze backwater impacts. *Section 3.1.5.*
5. The Federal Emergency Management Agency (FEMA) effective floodplain map is an unstudied A Zone. The area must be studied to determine actual floodplain elevations and floodway boundaries. This map/study should be used as a base for comparison to the proposed project. *Section 3.1.5.*
6. Provide documentation that the proposed maintenance building is outside of the floodway. If within the flood fringe, describe how the building will be built to minimum floodplain design standards. *Section 4.1.5.*
7. Provide documentation that the proposed changes to land use do not alter hydrology by increasing flows. *Section 4.1.5.*
8. Describe the wave run up elevation on Lake Michigan. Note: If the primary dune is graded down below the wave run up elevation areas west of the dune may be brought into the floodplain. *Section 3.1.5.*

Stormwater

1. Describe the storm water practices that will be used to treat roadway and golf course runoff close to the Black River and near any wetland areas where filter strips may not be feasible. *Section 4.1.6.*
2. Discuss how the golf course's nutrient management plan will prevent nutrient impacts to the Black River, which is a candidate to be listed as a 303d impaired waterway (for Phosphorus). *Section 3.1.4.*
3. Discuss the protective measures that will be used to minimize the impacts of the nutrients from the golf course entering the irrigation pond. How frequently is aquatic plant and/or algae management anticipated? Would that impact the availability to irrigate? (Many of the herbicides and algaecides have mandatory waiting period before the water can be used for irrigation.) *Section 4.1.4.*
4. Provide further details about construction sequencing. Discuss when pond and building construction will occur and what staging and practices can be used to prevent erosion. *Section 2.5.1.*
5. Clarify if infiltration basins will be used for stormwater treatment. Dry detention basins are not considered storm water treatment practice. Discuss the separation distance to the high groundwater as well as the type of soils for the detention basin. *Section 2.3.8.*
6. Discuss the temporary sediment and erosion control methods that will be used in each phase and how the phases will be temporarily and permanently stabilized. Describe practices to protect wetlands and waterways on the site from sediment (TSS) during and after construction. *Section 2.5.1.*
7. Describe soil profiles in the stormwater biofiltration areas. Please provide modeling to document the water quality and quantity performance of the biofiltration features. *Section 4.1.1.*

8. Describe the soil types in the storm water detention basins. Discuss basin design features including liner, depth to groundwater, and dewatering if groundwater is encountered during construction.
9. Provide a summary of soil boring information and groundwater depths for all storm water treatment areas. *Section 4.1.6.*
10. Describe the storm water management plan showing the details and modeling for all storm water practices. *Section 4.1.6.*
11. Discuss cart paths, location, soils, stormwater treatment, and if the paths meet the protective areas for streams (intermittent and perennial) and wetlands and Lake Michigan. *Section 4.1.6.*
12. Describe the spills plan for the hazardous materials being handled on site. *Section 2.6.2.*
13. Discuss the long term maintenance plan for the post construction BMPs. *Section 4.1.6.*
14. Discuss ability to achieve a maximum discharge of 5 tons per acre per year during any 12-month period between initial disturbance and final stabilization of sediment as required in NR 151.11. *Section 4.1.6.*
15. Describe the plan to minimize soil loss including preserving existing vegetation where feasible, diverting flow around exposed soils, temporary stabilization measures, staging of activities to limit exposure of unstabilized soils, stabilization of drainage channels, and installation of permanent stabilization measures. *Section 4.1.6.*

Drinking Water

1. Provide documentation of the well monitoring and pump tests discussed in *Sections 3.1.3 and 4.1.3* and well construction reports to the Department.
2. Describe how the proposed irrigation well(s) may affect the regional bedrock aquifer. *Section 4.1.3.*
3. Compare soil types at the Blackwolf Run, Whistling Straits, and proposed Town of Wilson golf courses and assess differences in irrigation needs. Provide irrigation data from existing golf course with similar soil characteristics to proposed Town of Wilson golf course. *Section 3.1.3.*
4. Provide data and maps to show the area of potential impact to private wells. *Section 3.1.3.*
5. Please provide information related to the anticipated population your wells will serve. This should include an estimated number of employees and expected amount of customers. This will assist the Department in assigning a classification and monitoring requirements for your wells. Additional guidance for a certified operator and system capacity will be issued to you, if applicable. *Section 4.1.3.*

For more information:

<http://dnr.wi.gov/regulations/opcert/smallwater.html>

<http://dnr.wi.gov/topic/DrinkingWater/CapacityDevelopment.html>

Water Resources and Fisheries

1. Provide an exhibit showing the irrigation pond and its overflow runoff channel, if there is one. *Section 2.3.7.*
2. The Black River fish community within the project area has historically scored 'excellent.' Describe what will be done to protect the Black River, including stream corridor buffer dimensions and buffer vegetation in the project area. *Section 4.1.4.*
3. Discuss the potential impacts of the project on aquatic habitat in Lake Michigan. *Sections 3.2.2 and 4.2.2.*
4. Discuss normal conditions in the Black River and Lake Michigan. *Sections 3.1.4 and 3.1.5.*
5. Describe how public access will be maintained to those who utilize the Lake Michigan shoreline. *4.3.1.*

Parks and Recreation

Provide for *Sections 2.0 and 4.6:*

1. A comprehensive traffic study considering the surrounding area and emergency vehicle operations.
2. Detailed design for park traffic queuing and entrance road.

3. Entrance road lighting plan.
4. Park and proposed golf course entrance signage and specimen trees.
5. Identification of utility corridors and substations in relation to state park features.
6. Detailed design of the proposed maintenance building and potential for impacts to the state park users.
7. Fencing and property boundary controls in relation to state park features.
8. Describe the potential impacts of any proposed replacement lands to address Land and Water Conservation Fund Act (LAWCON) conversion process for lands proposed to be taken out of public use. Note: the conversion process requires replacement lands have equal or greater size, value, and utility.
9. What are the proposed hours of operation?

Wildlife

1. Provide further analysis of existing forest habitat including an estimate of the area/number/types of trees to be removed, access for tree clearing, grading, top soiling, debris and stump removal, and any re-vegetation plan for those areas. Discuss the potential for impacts to interior forest bird nesting habitat, if it is present. Are there comparable habitat patches in the area? *Sections 3.2.1 and 4.2.1.*
2. Please provide any wildlife and migratory bird surveys conducted by Kohler or used in the EIR development. *Section 3.2.4.*
3. Discuss potential for reduction in habitat value by breaking up the large forested block and the resulting impacts to migratory birds. Describe impacts to nesting, breeding, etc. from the presence of continuous golf operations, maintenance and other activities. *Section 4.2.4.*
4. Describe how golf course irrigation ponds can provide habitat for water birds and aquatic organisms, and the potential for chemicals that may be present in the ponds to affect water quality, and usage by birds and aquatic organisms. *Section 4.2.7.*
5. Describe any alternative irrigation pond designs considered such as several smaller ponds that could avoid wetlands and have natural aquatic structures and vegetation to provide habitat for wildlife. *Section 4.2.4.*

Other

1. Does any historic land use have potential for soil and groundwater contamination?
2. Describe plans for how construction traffic will access the site and potential impacts. *Section 4.1.*
3. Describe how sensitive dune formations will be protected from the potential increase in foot traffic. *Section 4.2.*

Closing

Thank you again for providing the Environmental Impact Report describing the Proposed Golf Course – Town of Wilson. I will schedule a follow-up meeting with you to discuss the information requested to help the Department better understand the proposal and prepare for the Environmental Impact Statement process.

Sincerely,

Jeffrey Voltz
Project Manager

cc: Kurt Thiede--- DNR
Eric Nitschke--- DNR
Sheboygan Co. Administrator
Chair, Town of Wilson
US Army Corps of Engineers
US Fish and Wildlife Service
National Park Service
Federal Emergency Management Agency

