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July 24, 2015

Jay Schiefelbein
2984 Shawano Avenue
Green Bay, WI 54313-6727

Mike Thompson
Wisconsin DNR
2300 N Dr Martin Luther King Jr Dr
Milwaukee, WI 53212

Re: Scope of EIS for proposed Kohler Golf Course, Town of Wilson, Sheboygan Co.

Wisconsin Wetlands Association (WWA) is dedicated to the protection, restoration, and enjoyment of wetlands and associated ecosystems through science-based programs, education, and advocacy.

We appreciate the opportunity to provide input on the scope of the Environmental Impact Statement (EIS) for the above-referenced project. We have received numerous calls from members and other individuals concerned about the proposed wetland impacts, particularly impacts to Great Lakes Coastal wetlands, and we share those concerns.

The interdunal and ridge-swale wetlands located on the proposed development site are rare, with only 10 known examples in Wisconsin and small acreages present at each site. In 2009, WWA recognized the importance and rarity of these interdunal wetlands when we designated the adjacent "Kohler-Andrea Dunes Wetland Type" as one of Wisconsin's *Wetland Gems*[®] (http://wisconsinwetlands.org/Gems/NE5_Kohler_Andrae_Dunes.pdf).

Evaluation of impacts to these wetlands must include a thorough examination of direct (i.e., fill, grading, vegetation removal), indirect, and cumulative impacts. These interdunal and ridge-swale wetlands have formed over time through complex interactions with adjacent uplands, dunes, wind, sand, surface and groundwater, and Lake Michigan itself. Because these wetlands exist as part of an upland/wetland mosaic, and are located in highly permeable soils, they will likely be very sensitive to changes in site hydrology. Considerations of impacts should include, but not be limited to:

Direct impacts: Though it is difficult to tell from the maps provided in the EIR, it appears that the proposed access road and clubhouse, as well as proposed fairways #7, 8, 9, and 18 would be located in, or extremely close to, the majority of the interdunal wetlands on the eastern portion of the parcel. The EIS should include detailed maps of proposed facilities and fairways in relation to delineated wetlands *for each alternative evaluated*.

Preserving Wisconsin's Wetland Heritage

Loss and/or degradation of a rare wetland type: Evaluation must take into consideration the regional extent of this wetland type, and whether the proposed development will impact a moderate or substantial portion of what remains. Because small changes in adjacent topography or hydrology could have substantial impacts on wetland condition or function, the analysis of impacts must look beyond direct impacts to wetland acreage.

Site hydrology: Small wetlands can be particularly sensitive to both increases, and decreases, in the quantity of water received, as well as changes in water chemistry. Additional analysis is needed to understand current hydrologic processes on the site, and how the proposed development will alter surface and subsurface water flowing to and through these wetlands. Elements of the proposed development that will alter site hydrology include but are not limited to: grading and clearing, tree removal, conversion of natural vegetation to turf grass, addition of topsoil, changes in topography, and creation of impervious surfaces.

Site topography: Given that the site is relatively flat, a detailed topographic analysis is also needed to improve understanding of site hydrology and how the proposed features will alter drainage patterns.

Alternatives: The alternatives examined in the EIR were limited to alternative scenarios for the location of the entrance road and a couple of alternatives for the irrigation pond. The EIR did not include details of the location or extent of wetland impacts associated with each alternative. The EIS should include a more thorough evaluation of design alternatives including full documentation of associated wetland impacts. Given the sensitivity of wetlands on the eastern portion of the site, the EIS should include a discussion of whether the least environmentally damaging practicably alternative is, in fact, also the alternative with the smallest acreage of wetland fill.

In evaluating facility design, we particularly encourage review of alternatives related to the location and size of the clubhouse, the size, location, and need for the irrigation pond, and the size, location and need for what appears to be a driving range (the large rectangular feature near the entryway).

Given the close proximity of this facility to other Kohler owned golf courses, we recommend consideration of whether features such as the driving range and some of the club house amenities are needed at this location or whether this space could be freed up to reduce the need for one or more of the fairways currently proposed for the interdunal area? If the design or configuration of the facilities or fairways are influenced by PGA competition standards these details should be included in the Purpose and Need portions of the EIS.

Affects of lake levels and flooding: The proposed project is sandwiched tightly between two dynamic waterways, both of which are subject to significant water level fluctuations. The site is resilient to these changes, in large part, because of the intact native plant communities. The EIS should evaluate how the proposed changes to vegetation in wetlands and uplands will affect the capacity of the land to tolerate future water level changes. This is particularly important to consider with respect to changes in Lake Michigan water levels and impacts to coastal wetlands.

The EIS should also examine how establishment of this facility so close to the floodplain and associated wetlands may impact golf course operations and/or river health during times of heavy rains or high water.

Wetland Functional Assessment: The wetland functional assessment provided in the EIR ranks all but 4 of the 81 wetlands on the site as “high” quality. This information should be integrated more prominently in the EIS and given full consideration in the analysis of whether the preferred alternative complies with Wisconsin’s Water Quality Standards for Wetlands under NR 103.

We thank you for your consideration of these comments on the scope of the EIS for this proposed project.

Regards,

A handwritten signature in black ink on a light gray rectangular background. The signature is cursive and appears to read "Erin O'Brien".

Erin O'Brien
Policy Director