

July 23, 2016

I am strongly opposed to the development of the proposed 18--hole golf course in the Town of Wilson by the Kohler Company. I also feel the DNR's proposed Environmental Impact Statement (EIS) is flawed and incomplete for the following reasons:

- The Dept. of Natural Resources has no right and nor any responsibility to "give away" 4-plus acres of publicly-owned state park land to anyone, especially to a "for-profit" business or person for the purpose of increasing the revenue of such business or to increase the income of any person or corporation. Kohler-Andrae State Park's land acquisition was supported by Federal LAWCON funding. As such the conversion of these public lands to a private person or corporation is NOT justified to accommodate their financial interests and is not permitted except in very rare circumstances.
- The EIS document map shows a total of over 19 acres that are being considered for Kohler's development with no detail as to the actual footprint of the development. The EIS mentions the size of maintenance building to be constructed on state park lands but does not state the size of the paved parking lot that would need to service the proposed maintenance building. The area listed for conversion is listed as "lightly used" ... as if it doesn't matter if the land is given away or not. This is far from the truth. The area may not be used as heavily as the park's beach and picnic areas but this was by design by park management. Hiking trails, boardwalks, restrooms, etc. were left out of this area to keep it in its natural sand dune state to protect this rare ecosystem as mandated by the Kohler-Andrae State Park Master Plan.
- The DNR's EIS states that permitting the transfer of public land for Kohler's own private use and the development of roads, shop buildings and parking areas on these fragile and rare sand dune lands would "not set a precedent" My question and that of anyone else reading this EIS is how could it not?
- If this is approved for Kohler, "I" would like to request and expect approval for my own 4 acres so I could set up my own business, perhaps a hotdog stand. Of course, like Kohler, I would have to ban park visitors from ever setting foot on my part of their public land again (unless they purchase one of my hotdogs of course).
- This land transfer for private use should not be allowed regardless of the political involvement, DNR appointments and pressure from the Governor's office. The DNR is supposed to represent the preservation and protections of all public lands. Park visitors should not have to be denied access to their public lands just to appease a large corporate donor to a particular party or person. If so, all confidence is lost for this agency now and into the future. The EIS hints at what is already known in that the DNR intends to "alter" the existing property master plan in order to give away this part of the park to a corporation. The Kohler-Andrae Master Plan was developed over several years of local and statewide public input and was approved by the Wis. Natural Resource Board. It cannot be altered without permission and approval of the natural resource board "and" without new local and statewide public debate/hearings.
- The EIS does not include the acreage necessary and loss of sand dune habitat needed to construct the proposed "roundabout" at the park's office area. The design shown in the document would be way too small to accommodate all the heavy traffic and especially the larger delivery semi and panel trucks that would be entering and exiting the state park and the golf course on a regular basis. It would not even accommodate most of the larger RV's and longer camping trailers that would need to maneuver through this small roundabout. A much larger roundabout would be needed which would require at least an acre of land (sand dune habitat) and create even more lost public land and habitat.

- The traffic system LOS (Level of Service) calculations were incomplete and as stated in the DNR EIS report, did not occur during the heaviest use times for traffic on weekends. With more than 400,000 visitors a year the Kohler-Andrae entrance is already burdened by way too many vehicles, RV's and trailers. Backups all the way out to the Co. Hwy V have regularly occurred during busy times and even during the evening hours if special event are held in the park. The addition of even more heavy traffic due to Kohler's golf course and their proposed clubhouse/restaurant by cars, delivery trucks and most likely buses from their own hotels, would certainly cause traffic jams and confusion for all, especially since their highest use period would "also" be on weekends. Visitors to both the state park and the golf course will be frustrated by this unnecessary traffic congestion. It would also hamper all police, fire and rescue emergency calls. According to Kohler's plan for the course it would host some high profile events as well. If so, "where" would all these people park and how would they all access the golf course at the same time of year that the state park has so much incoming and outgoing traffic?
- If Kohler receives a positive DNR EIS report it should only be approved without the loss of publicly-owned state park land for their entrance road, roundabout, shop building and parking lots. There is no convincing need to use state park lands to accomplish their project other than it is the "cheapest" way to go for the Kohler company. This should not be a consideration for the DNR to give away state park lands. The alternative D-3 of the EIS is the correct route to go and should be selected by the DNR's EIS as the only course to take. The D-3 version allows Kohler to make use of their own existing entrance off of Co. Hwy V (12th Street) north of the state park with a direct eastern access to their property. Yes, this would mean the construction of an expensive bridge over the Black River and additional road building on their property but again, this is the Kohler Company's concern and not the DNR's. There is no logical reason why the golf course shop building and parking lots could not be built on their own property adjacent to the existing state park shop building as was originally planned. There is no reason to take away public state park land and destroy rare sand dune formations and habitat for Kohler's shop building and parking area development when they have 247 acres of their own property to work with.
- The EIS does mention a few negative effects of Kohler's plan to deforest 150 or more acres of mature timber but there are many more. This unique forest, dune and wetland area is an extension of the rare sand dune ecosystem that is currently protected and managed by the DNR on the Kohler-Andrae State Park property. Clear cutting, pulling stumps, and bulldozing these areas for the purpose of installing golf course greens will forever destroy a fragile landscape and ecosystem that has evolved in its present state since the last ice age over 14,000 years ago. Unfortunately the Kohler Company does not see any problem with destroying this very unique and rare Great Lakes sand dune area for the purpose of building a golf course for their wealthy clients. The EIS does mention that there are "several rare species" that will be destroyed by Kohler's development. A few are listed but not all. Some are Federally threatened species such as the dune or pitcher's thistle plus state threatened species including most of the dune grasses such as marram/beach grass, thick-spiked wheat grass, sand reed and many others. Many of these are only found growing on Great Lakes sand dunes and nowhere else in the world.
- Bird, mammal, reptile, amphibian and insect life (some rare/threatened) that have adapted to both the wooded and open dune habitat would also be displaced or destroyed by the Kohler development. The combination of the state park and Kohler forested area has long been known as an "Important Bird Area" (IBA) for migratory birds along Lake Michigan. Throughout the entire history of the DNR and the Conservation Commission before that, staff managers, biologists and scientists have supported and strived to protect these areas at all costs. The EIS should make a strong statement against the destruction and

fragmentation of this important IBA and Great Lakes dunes habitat. It should be noted also that an active bald eagle nesting site is located only a short distance to the north of the Kohler property which most likely will be negatively affected by the massive tree removal, development and increase in public use of this area.

- The EIS also mentions several “globally rare” wetlands that will be lost in the construction of the golf course. The DNR’s own Bureau of Endangered Species has termed these rare wetlands (Interdunal wetlands) as the rarest, most irreplaceable habitat/ecosystems in the state of Wisconsin. If the DNR doesn’t protest the irreversible/permanent destruction of this important and threatened ecosystem who will? Wetland replacement mitigation was mentioned as a possible replacement of these lost wetlands but it must be very clear to all reading the EIS or least the DNR staff themselves that these rare ridge and swale interdunal wetlands cannot be reproduced artificially elsewhere. The EIS should make this clear to all readers in addition to explaining why these wetlands and surrounding dune formations should be protected from development.
- The effects of groundwater well water drawdown due to the proposed high capacity wells usage is listed in the EIS as “uncertain”. This uncertain designation is not appropriate and should be studied in more detail by someone other than the Kohler Company. Their estimate of using 15-25 million gallons a year (just to water their golf course) plus about 2 million more of potable water usage seems low. These estimates were all based on water usage at Kohler’s other golf courses. This reasoning fails to take into account that none of the other courses were built on 247 acres of nearly pure dry sand with little or no water holding capacity.
- There was mention that the high capacity wells located within Kohler-Andrae State Park have not caused any problems to the surrounding landowners but obviously the park doesn’t use 15-25 million gallons of water for irrigation/watering lawns. In fact, the park doesn’t water any of its lawns and never has. The park only uses well water for flush toilets, water fountains, two small fill towers at the dump station for campers and to provide water at few shower stalls and sinks for campers. Kohler’s only advise for local neighbors who will run out of water when their wells run dry is to contact them for help and “they” will determine if they believe their water drawn down are at fault or not. This information (clearly written directly by Kohler staff) does NOT belong in a DNR EIS document in my opinion and is of no help to local citizens who will be affected by the massive water use for the golf course. In addition, the state park itself may have water issues with its own wells due to the high draw of ground water aquifers which will affect all state park visitors and campers.
- Overall, I feel the DNR’s EIS is incomplete, lacks scientific analysis and study, and depends way too heavily on the Kohler Company’s own very slanted studies and papers. Much of the EIS document seems to be a rehash of Kohler’s EIR report from March of 2015. At that time citizens were asked to submit questions and concerns about that document as did the DNR itself. To date very few answers or responses have been given by the Kohler company to those concerns and are clearly NOT covered in the proposed EIS. It would seem impossible to complete a DNR EIS without that data and lots of other very important “missing” information about the golf course and related facility/roads development plans. Unfortunately as a result of this missing documentation and lack of detailed construction and road/parking lot placement plans it is really not possible for citizens to comment fully on Kohler’s proposal or the DNR’s current EIS.

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