

**NAVY COMMENTS AND
 C.H. GUERNSEY RESPONSE TO NAVY COMMENTS
 FOR MARCH 20, 2002 DRAFT ENVIRONMENTAL ASSESSMENT
 FOR WILLOW GLEN GOLF COURSE
 GREAT LAKES NAVAL TRAINING CENTER
 GREAT LAKES, ILLINOIS**

Comments by Tom Kelley, D-CIV, CNET

COMMENT	C.H. GUERNSEY RESPONSE
1. Will/can this project incorporate any sort of stormwater swales to help prevent the runoff of pesticides and fertilizers used on the golf course, i.e. the swales to catch the sheet flow of rain water and allow the water to percolate vs run directly into the creeks?	Ecologically, it is not likely that swales constructed along the creeks to prevent stormwater runoff would be effective in preventing pesticides and fertilizers into the creeks. A better mitigation against pesticides and fertilizers entering the creeks is to lessen or prevent the application of pesticides on the golf course and especially in close proximity to the creeks. For golfing needs, constructing swales would not allow for proper drainage of the golf course. Furthermore, such swales would be difficult to construct while trying to minimize floodplain and wetland impacts.
2. Page 14, section 3.1.24 indicates ADID site 110 is less than one mile away from this project. What impact, if any, will the project have on this site? What proper construction practices will be used to prevent impact to the site?	The best management practices to prevent impacts to all of the wetlands on the site, including ADID site 110, are explained in the Integrated Natural Resources Management Plan for NTC.

Comments by Carolyn Slowikowski, Cdr, CNET

COMMENT	C.H. GUERNSEY RESPONSE
1. Section 3.1.2.4, pages 12 and 13 states, "Nine wetland areas were identified on the golf course. Earlier investigations in 1996 and 1997 identified 10 wetlands, 1 of the wetlands no longer exists, due to changes made in the layout of the golf course and drainage improvements." What happened to the wetland and was a permit required/obtained to fill it? If all required procedures were followed since 1997	During the 2001 delineation of the site, the U.S. Army Corps of Engineers determined that Wetland #5 was not a wetland site. All references to Wetland #5 and the number of wetlands ever being 10 have been deleted from the EA. The EA will be based on the 2001 wetlands delineation only, which shows 9 wetlands, still numbered 1-10, with no wetland #5.

resulting in the loss of one wetland, does the EA need to mentioned that there were 10 in the past?	
2. Section 3.2.2, page 21 discusses proposed 7 sites for additional investigations or confirmatory sampling under the NACIP program. Are any of the sites located on the golf course? Request clarification.	Yes, the FFTU site is one of the seven sites.
3. Section 3.2.3 might clarify comment 2 above. It states, that the FFTU area in the center of the golf course are the two sites in the project area included in the seven sites determined to warrant further investigation. Will the additional investigation affect golf course modifications around the FFTU?	At this time, any additional investigations of the FFTU site are not expected to affect the golf course improvements. Additional investigations for this site are not currently funded and funding is not expected until 2008.
4. Section 4.5 and its subparts start on page 47. Several subparts, such as 4.5.15 do not indicate how the applicable statute relates to the project. (4.5.17, 4.5.18, 4.5.19)	Each statute or regulation under Section 4.5 now explains its applicability to this project.
5. Addition of a table of acronyms would be helpful.	A Table of Acronyms has been added just after the Table of Contents.

Comments by Gary Sweppenhiser, CNET Code N4412

COMMENT	C.H. GUERNSEY RESPONSE
1. Section 2.1 page 4. States "Construction of new cart paths". Section 4.2.7.3 p45 says, "construction of new facilities would not increase the impervious surface area..." Are the "new" cart paths a one for one replacement of existing cart paths? What are the new cart paths made from? Additionally, Plate 1 shows a new parking lot?	The new cart paths will replace the existing cart paths. In locations where the existing cart path alignment is not followed, the existing cart path will become a sodded area, incorporated into the course. Therefore the amount of impervious surface area would not increase. The cart paths will be constructed of asphalt. There is no new parking lot associated with this project. An existing parking lot is shown on Plate 1.
2. Figure 2. According to the legend the whole area looks like a "proposed putting green"?. Additionally, it looks like work will also occur outside of "just the back nine"? Draw a heavy line on map(s) showing "limits of construction". Legend shows existing putting green to be a	Figure 2 as been revised as requested.

<p>“proposed wetland”? Legend shows new and existing contours, but none are shown on the map? Map shows items (ponds?) that are not identified in legend. “Proposed mound locations” is used in legend, but not shown on map? Rework figure 2.</p>	
<p>3. Figure 3. Contours are confusing in the lake areas. Are the solid lines new contours, legend does not indicate? Is the plan to excavate in the lake (wetland) areas? Please clarify.</p>	<p>There are not plans to excavate the lake areas. The legend for Figure 3 has been corrected.</p>
<p>4. Section 3.2.1 page 20. “no restroom facilities on the back-nine...” Does the maintenance facility b-3311 have a restroom for employees? How is it handled?</p>	<p>The maintenance facility does have a restroom for the employees. The wastewater from this restroom is connected to the Great Lakes Wastewater Treatment system and is treated at the wastewater plant. This information can be found in Section 3.3.8.2.</p>
<p>5. Section 3.2.3. page 22. “the FFTU area...determined to warrant further investigation.” Yet section 3.2.3.2 page 26, says, “The Risk Assessment report was submitted and site closure has been approved.” Please clarify.</p>	<p>The Risk Assessment report was submitted to the state and there is no further response from the state. It is not known what the state may require based on this Risk Assessment in the future. This is a difficult item to clarify because there is no response from the state.</p>
<p>6. Section 3.2.3.1 page 25. “...medium ranking, which places the landfill on a schedule to receive funding in 2008 to conduct further remedial investigation on the site.” Will the remedial investigation simply be monitoring wells or will it include removal actions that would affect the newly worked golf course?</p>	<p>It is not known what the further remedial investigation may involve. Because there is no funding until 2008, the methods or procedures for any further remedial action are not specified. The newly worked golf course should not be affected until 2008, and at that time, there would likely be minimal impacts to the golf course.</p>
<p>7. Section 3.2.3.1 page 25. “NPDES outfall from the FFTU lagoons...”. Will the proposed action require a modification to the NPDES permit? Is the permit still active?</p>	<p>The NPDES stormwater permit and associated stormwater pollution prevention plan for NTC has been modified and updated since the 1991 report about the FFTU site. There are no longer lagoons at the FFTU site because the site is closed. There is an existing stormwater outfall from near the area of the former FFTU site and it is included in the stormwater pollution prevention plan.</p>
<p>8. Section 4.1.3.4 page 37. “...should have no impacts to the wetlands...” Section 2.1 says, “cleaning of the ditch</p>	<p>The ditch is not a wetland. It is an underground culvert. The cleaning should improve the drainage through the golf</p>

<p>along holes 10, 17, and 18.” Is the ditch a wetland? Additionally, Plate 1 shows a realignment of a ditch (wetland). Please clarify.</p>	<p>course. Plate 1 has been corrected. The delineation completed in 1996 had been used by mistake in the Draft EA. The most recent delineation, 2001, is now used for Plate 1.</p>
<p>9. Section 4.5.10 page 49. “wetland areas...would not be impacted during the proposed project.” Please clarify, see above comments.</p>	<p>As stated in the response above, the 2001 wetland delineation is now shown on Plate 1 and shows no impacts to wetlands during the proposed project.</p>
<p>10. Plate 1. Please verify contours in vicinity of ponds (lakes). Show limits of the proposed action. Is wetland 5 being realigned? Is there a new parking lot in this project?</p>	<p>All of the corrections to Plate 1 have been made. No additional contour data was available in the vicinity of ponds. Wetland 5 is no longer considered a wetland by the U.S. Army Corps of Engineers as shown in the 2001 delineation, now depicted on Plate 1. There is no new parking lot for this project. That parking lot is an existing one.</p>