

## The Project

### How is SMC funded?

*SMC is funded by grants (private, state, and federal), partnerships with local agencies, and Lake County Government.*

<https://www.lakecountyil.gov/554/About-Us>

### How is this project funded?

This project is also funded by grants (state and federal), partnerships with local agencies, and Lake County Government. For example, Congressman Brad Schneider successfully advocated for \$7.7 million in federal monies for this regional project. See [Press Release](#).

### Why is SMC meeting with the Park District?

SMC first reached out to the Lake Bluff Park District in January 2021 regarding the Skokie River Floodplain Regional Flooding Project. The Lake County Stormwater Management Commission (SMC) has been collaborating with local, county and state partners since May 2020 to help alleviate flooding along Route 41 in North Chicago between Strawberry Condominiums and the Naval Station Great Lakes properties along the Skokie River. In order to alleviate flooding in this area, 40 acre-feet of compensatory flood storage must be excavated downstream of the project to ensure there will be no negative downstream impacts. SMC reached out to the Lake Bluff Park District to consider allowing the implementation of some or all of that compensatory flood storage on the Lake Bluff Golf Course property. **There is no monetary amount that SMC is asking for from the Lake Bluff Park District.** SMC has state and federal appropriated funding to implement regional stormwater management projects, which would cover the costs of this project including the compensatory flood storage. This funding source is only available now and is a limited window of opportunity for SMC and local partners (which includes the Lake Bluff Park District). **The end result of this is hopefully the project can also mitigate some of the current flooding on the Lake Bluff Golf Course and the local area. This request is a voluntary request to the Lake Bluff Park District.**

### Why is 40 acre-feet of stormwater volume needed?

The 40 acre-feet of stormwater storage will ensure that when a larger pipe is placed under the UP North railroad tracks to mitigate the flooding of US Route 41 and the surrounding area, the increased velocity (*not volume*) will not create negative downstream impacts. Any storage greater than 40 acre-feet will improve downstream flooding and SMC is interested in having greater storage and paying for the creation of that storage. The Naval Station Great Lakes and SMC have agreed that this potential project cannot create any negative downstream impacts.

The 40 acre-feet of stormwater temporary storage could take different forms – from a detention basin to wetlands. The final design will be decided upon by the partners of the project which is all voluntary.

For more information on this you can refer to the Lake Bluff Park District's Land Use Task Force Committee Meeting on January 25 when Kurt Woolford speaks about how the larger pipe can impact downstream flooding.

Minute 37: <https://www.youtube.com/watch?v=gwVkqoDnnWU>

Please note that during the meeting Kurt is asking to share his screen with the attendees. Unfortunately, the recording did not capture the screen sharing.

**There is a lot more rainfall than there was in the past, and more flooding. Is 40 acre feet enough?**

The study was done by Burke Engineering and may be updated to take the greater rainfall into account. SMC has already stated that they would be interested in increasing the flood storage for this area.

**If the flood storage is created on the Navy Base (Options 1 & 2), would the golf course still flood, and if so, would it flood less than it does now?**

The golf course will still flood, at the same amount, because it is on a floodplain. If the 40 acre-feet is stored on the Navy base, that is sufficient storage to ensure no *increased* negative downstream impact.

**Will the golf course still flood if the 40 acre-feet storage is added to the golf course site? Is it still a floodplain?**

The answer depends on which design the Park District decides to implement (the acre-feet of storage varies by design). If the land is regraded as part of the regional stormwater project to create a detention basin, ponds, wetlands, or a combination of the three, some of the land could/would be regraded, but again it depends on what the Park District wants and of course any excavation and/or regrading that is paid for by SMC would need to be related to the stormwater project. If there are no changes to the grade of the floodplain, then that portion of the land will continue to flood.

**Will helping with this project require the closure of the golf course?**

The golf course does not need to close. The design of the stormwater storage is up to the residents of Lake Bluff. Storage could be created on the Park District site in the form of a detention basin; wetlands with a golf course; mostly wetlands, or all wetlands. However, having wetlands is more advantageous from a financial, recreational, and environmental perspective.

**What is the decision process to determine the final storage site(s)?**

The partners of the Skokie River Floodplain Enhancement Project are SMC, City of North Chicago, East Skokie Drainage District, UP North Railroad, Illinois Dept. of Transportation, and the US Navy. The partners work together to determine the best site(s). All participation is voluntary.

**Does this project help flooding in areas of Lake Bluff outside of the golf course?**

No, but it *does* help with flooding within the boundaries of the Park District. The Park District's boundary extends north into Forrestal Village just west of Green Bay Road. This is where Option 1 or 2 could be for stormwater storage. It also extends west across US 41 where the flooding exists, and to the land north of the Sanctuary. This project is to mitigate flooding along Route 41 between Routes 176 and 137. SMC is currently in conversations with the Village of Lake Bluff to mitigate flooding in other areas of the Village.

**Why is this just coming up now if SMC has been working on it so long?**

SMC first approached LBPD in January 2021 when the Christopher Burke Engineering completed a Hydrologic and Hydraulic Study that found that 40 acre-feet was necessary to mitigate flood damage. SMC has been in conversation with LBPD staff since January 2021.

**What is the cost to the Park District to build the water storage on the Park District property?**

**What if it comes in over budget?**

There are no costs to the Park District. All costs are covered by SMC including project overages.

**Has the Navy agreed to provide one or both of those locations, should their site be picked? What, if anything, is currently on the Navy sites?**

The Navy is a partner in this project and is collaborating with the other partners (City of North Chicago, Illinois Dept. of Transportation, Stormwater Management Commission) to find the best site(s) to alleviate flooding. The Navy actively participates with the project partners on the potential storage locations on their property but no commitments have been made by the Navy. There are existing detention basins east adjacent to the Skokie River that are proposed to be expanded if storage on the Navy property is chosen.

**Will stormwater be diverted from other areas and onto the golf course to fix this regional flooding problem?**

No additional water would be diverted onto the golf course. The drainage pattern and tributary area is not changing.

**If there is no additional water is being added to this, then why would you need additional stormwater storage?**

The reason why additional stormwater storage is needed is because the velocity of how quickly the water will leave the area will increase – the stormwater would drain faster. Right now, US Route 41 floods because the water drains slowly due to a restriction (smaller pipe) under the railroad tracks. To fix the flooding, it is necessary to enlarge the pipe (from 30" pipe to 60" pipe) under the railroad tracks so the water will drain faster. To ensure that there is no increase in downstream flooding (due to the increased velocity, NOT volume) 40 acre-feet of stormwater storage is necessary.

For more information on this you can refer to the Lake Bluff Park District's Land Use Task Force Committee Meeting on January 25 when Kurt Woolford speaks about how the larger pipe can impact downstream flooding.

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**I keep reading that it would be a “chemical sludge pond.”Is that true?**

That is not true. Again, there is nothing different about where the water is coming from, before and after the project. There is no diversion of water; it is coming from the same places that it has always come from. The only difference is that the pipe is bigger under the railroad tracks so that US 41 doesn't continue to flood. So if the property is not a “chemical sludge pond” now, it wouldn't be one in the future.

**Lake Bluff Park District Vice President Beeler stated that stormwater has a lot of toxic substances, like oil, grease, and fecal coliform. Why would we want to bring those things onto Park District property?**

Stormwater has been flooding the golf course for decades, and does contain toxic substances. The addition of wetlands creates a natural filtration system that would clean this water before it goes into the Skokie River. No water is being diverted for this project. This project only increases the speed (or velocity) in which the stormwater arrives on the golf course. It does NOT increase the volume. The drainage pattern that has existed for decades will not change. The only difference is how quickly it can arrive on the golf course. To avoid downstream flooding, 40 acre-feet of excavated stormwater storage is needed to compensate/counter the increased velocity. The majority of it will still drain down the river as it does today.

**Why would we want toxic stormwater to sit on the golf course property longer than it does today?**

The stormwater would NOT have to sit on the property for longer. During a heavy rain, the golf course holds a significant amount of stormwater when it rains, and then it recedes. This is for two reasons; one is because it is a floodplain, and the other is because the floodplain has turf grass. The stormwater sits on top of the turf grass because turf grass isn't deep rooted like wetland plants are. If the floodplain had the native plants that are normally found in a floodplain (like wetlands), the water is absorbed underground by the deep roots of the plants, some that go as deep as 8-15' deep. The wetlands act as a sponge and as a natural filtration system, removing and breaking down toxic substances before slowly releasing water over time.

**Who makes this decision, and what is the process?**

This decision is the responsibility of the Park District. In January 2021, SMC requested that the Park District meet with the project partners to learn more. If the Park District accepts this invitation (the project partners continue to meet on a monthly basis), the project can move forward with storage created either on the Navy property or the golf course. Until the Park District comes to the table to discuss options, or decides that they do not want to be a partner, the project is essentially at a standstill.

**When does this decision need to be made?**

SMC needs to determine the stormwater storage site by the end of 2023.

## Wetlands

### **What are Wetlands?**

Here are three sites that provide good information about wetlands:

<https://www2.illinois.gov/dnr/conservation/Wetlands/Pages/Wetland-Communities-in-Illinois.aspx>

<https://extension.psu.edu/managing-your-restored-wetland>

<https://www2.illinois.gov/dnr/publications/Documents/00000161.pdf>

Here's a [Wetlands Initiative video with keynote speaker Bill Kurtin](#) about wetlands in the State of Illinois.

Here's [another about using wetlands with farm fields](#).

### **Will this be a soggy area that attracts mosquitos?**

No. There are many different types of wetlands in Illinois. It can be designed how the LBPD and the residents would like it to be. It could be a golf course w/a detention pond or wetlands; lake(s) for fishing; or it could be an expanse of wetlands that will not have any standing water. When there is open water in a wetland, the diversity of other animals, like birds, that inhabit the area naturally control the insects, including mosquitos. This is different than a body of water on a golf course, for example. The surrounding land does not support any wildlife, and mosquitos can be a significant problem. We can expect that there would be less of a problem with nuisance mosquitos, not more.

### **I know that Highland Park closed a golf course a few years ago. What happened to that?**

#### **Would this be similar?**

That decision is up to the Park District and Lake Bluff residents. [The Highland Park Park District did close a golf course](#) and received funding from Illinois Dept. of Natural Resources and Illinois Environmental Protection Agency and worked with Lake County Stormwater Management Commission to modify the land, and is described on their website:

*"Already a protected open space, the 100-acre parcel featured promising woodland, wetland and riverfront habitat areas, as well as interesting golf-related topography and features such as sand traps, meandering cart paths and river crossings. It was a rare opportunity for the community to have such a large open space available for passive recreation. It also met a need for residents to have access to additional walking and biking trails identified in a Park District Community Attitude and Interest Survey from 2009 and 2013."*

[There is also an FAQ section outlining the goals of their project:](#) *"The goal of the Preserve project is to create a unique passive natural recreation area for our community. The property also presents an opportunity to enhance stormwater storage capacity on the site to help alleviate flooding for our residents, especially those residing in the Skokie River watershed. In the near*

*term, our plans to restore wetland habitat and native vegetation will help with both water quality and in reducing flooding on the site.*

*The Park District has worked with the Lake County Stormwater Management Commission and the City of Highland Park to seek grant funding for flood storage areas that would also enhance the natural habitat and enjoyment of the site. We will work in partnership with these agencies to preserve the essence of the natural areas, public spaces and trails being implemented in the community park project.*

### **So then what would it look like?**

The design would be determined by the Lake Bluff Park District and the Lake Bluff residents; several concepts have been presented to give an idea of what it could be. SMC will pay for the excavation of 40 acre-feet (*or more*) of stormwater storage with vegetated ground restoration. The 40 acre-feet (*or more*) could be a detention basin or wetlands, with or without a golf course or other recreation areas. However, there are advantages to the Park District and residents if wetlands were created instead of a detention basin.

### **What are the benefits to creating wetlands instead of a detention basin?**

The benefits of wetlands are environmental, recreational, and financial and are an important consideration if there is sufficient land. Wetlands serve important environmental functions.

Some examples are:

- Stormwater and flood control. Wetlands absorb large amounts of storm water and reduce flooding by storing and slowing down the water force.
- Habitat for threatened and endangered plants and animals. In Illinois, more than 40 percent of these species depend on just 2.6 percent of the landscape which is still wetland. Wetlands provide food, water and shelter for a variety of plants and wildlife. Wetlands are resources that serve as vital connections between dry land and permanent water. They are often transition areas, changing in response to weather conditions and precipitation patterns. During a dry year a wetland may not be very wet. During a year with heavy rains, that same area may fill and hold water for extended periods. Wetlands may perform different functions in a dry year than in a wet one. This ability is what makes them so unique and so valuable.
- Improvement of water quality. Wetland vegetation slows sediment build up and absorbs as much as 90 percent of high nutrient levels which can cause further management problems if they reach other wetland areas.

Wetlands can be used as part of recreation. Increased biological diversity can provide for diversity of recreational activities and enhance the aesthetic qualities of the site. Wetlands help support fishing, boating, and wildlife observation. Wetlands can also be part of the landscaping, or the surrounding area, of other uses, such as playgrounds. The rich ecosystems of wetlands are natural locations for biological research and observation.

Wetlands can be financially attractive as well. In areas that could transition into wetland, there are opportunities for the landowner to create wetland mitigation banks. There are very few wetland credits available for sale in Lake County, and the price per acre (*for credit, not for sale-*

the property would remain the property of the Lake Bluff Park District, and therefore the residents) in the Skokie River watershed is estimated at \$150,000 per acre. The Park District would retain ownership of the land, and it would be protected in perpetuity.

**Isn't it expensive to create wetlands?**

It IS expensive to create wetlands, but because stormwater storage is needed for this regional flooding project, SMC will pay for the entire construction of the wetlands. There is NO COST to the LBPD to create the wetlands, since the wetlands would be created to help with this regional flooding project. However, this project must be complete by end of 2026, so if the Park District chooses not to partner on this project but decides to do this in the future, the money (grant funding) will not be available from SMC and stormwater storage will be found elsewhere (i.e., the Navy base).

**What is the anonymous donor willing to give?**

The anonymous donor is willing to give the Park District up to \$1 million for the short-term costs, which is more than enough to cover the 3-5 year expenses. To understand if this would cover all the needs, we reviewed information from Highland Park "The Preserves" site (a former golf course in Highland Park is being transformed into a passive recreation area with a playground); Libertyville Township, an IDOT wetland mitigation bank; an LCDOT bank, and Lake County Forest Preserves.

**What if there are walking trails, overlooks, and shelters? Who pays for that?**

The land could be graded to the specifications of the Park District. Walking/biking trails, fishing platforms, overlooks, and small bridges would need to be paid for by the Park District budget, donations, or grants. The anonymous donor has agreed to pay for the addition of trails, fishing/viewing platforms, and seating areas that are within the wetlands. If the Park District decides to use the wetlands as a wetland mitigation bank, the revenue from the bank could be used to maintain these items along with other assets of the Park District.

**Can there be recreation areas with wetlands?**

Yes. There could be walking and biking trails, birdwatching, fishing, and cross country skiing. Middlefork Savanna is a good example of what the property could look like. However, there are other opportunities too. A portion of the site could be set aside for a golf course, or there could be an area for a soccer field, dog park, playground, mountain bike park, etc. It is really up to the residents of Lake Bluff.



## Maintenance

### Good to know that SMC will pay for the creation of the wetlands, but is it expensive to maintain wetlands?

The maintenance of wetlands can be broken down as short-term (usually up to three years, but can go up to five years) and long-term (beyond three or five years). In general, mitigation banks should be planned and designed such that little or NO long-term maintenance other than prescribed burning once every three years is required. However, an anonymous donor has offered to pay for the short-term costs up to \$1 million.

#### **Short Term**

*An anonymous donor will pay up to \$1 million for short term costs* if the majority of the land becomes wetlands. The donor is okay with a dog park, soccer field, and passive recreation (walking/biking paths, open space, fishing, etc.) within and around the wetlands. This is *far* more than enough to cover the short term costs.

#### **Long Term**

Long term costs average *less than \$200/year/acre*. With wetlands, some herbiciding may be required to control invasive species. What may be *recommended* (if invasive species are becoming prevalent) is burning approximately once every three years. If that is required, landowners will often burn a third of it at a time.

**Libertyville Township** provided the following cost examples for long-term maintenance for their Atkinson property:

Activity	Materials/Professional Services	Staff Time	Total and Cost/Acre
Herbiciding	\$3,500	\$5,040 (40 hrs. each for 3 staff members)	\$8,540 total, \$106.75/acre
Prescribed Burn	\$8,470 (every 2/3 years depending on needs/conditions)		\$8470 total, \$35 - \$53/acre
Brush Mowing		\$5,040 (40 hrs. each for 3 staff members)	\$5040 total, \$63/acre
Column Totals	\$3,500 \$11,970 (annual cost with prescribed burn)	\$10,080	
<b>Total Annual Cost</b>	<b>\$13,580 (without prescribed burn)</b> <b>\$22,050 (with prescribed burn)</b>		<b>\$169.75/acre without burn</b> <b>\$275.63/acre with burn*</b>

\*Prescribed burns are not necessary every year. If it is needed, often a 1/3 of the property is burned per year.

**Lake County Dept. of Transportation and Illinois Dept. of Transportation** operate wetland banks. The costs for short and long term maintenance for two areas are included below:

Parcel	Acreage	Cost	Cost / Acre
Buffalo Creek Wetland Bank (LCDOT)	65 (25.4 wetland credits)	\$8,000/year	\$123/acre for first five years
Buffalo Creek Wetland Bank (LCDOT)	65	\$184,000 lump sum payment TOTAL	\$2830/acre for maintenance <b>IN PERPETUITY</b> 20 yrs = \$142/acre 30 yrs = \$94/acre 50 yrs = \$57/acre
IDOT/Tollway Wetland Bank	158	\$20,000 - \$30,000/year	\$126.58 - \$189.87/acre

**Lake County Forest Preserve District** Executive Director Ty Kovach offered these costs as examples:

LC Forest Preserves	Cost	Acreage	Cost/Acre
In-house staff	\$2,000 - \$7,000	77	\$26 - \$91 / acre
Contracted	\$5,000 - \$8,000	77	\$65 - \$104 / acre
Example: Middlefork Savanna	\$40,000 - \$60,000	687	\$58.22 - \$87.34/acre

The Lake County Forest Preserves passed a resolution awarding contracts for invasive plant control. The breakdown is as follows:

Forest Preserve	Cost	Acreage	Cost/Acre
Cuba Marsh	\$26,340	781	\$33.73
Middlefork Savanna	\$32,635	687	\$47.50
Grassy Lake	\$30,730	689	\$44.60
Fort Sheridan	\$33,472	250	\$133.89

Here is a link to the agenda item:

[http://www.lcpd.org/assets/1/28/9.4\\_Invasive\\_Plant\\_Control\\_Contracts.pdf](http://www.lcpd.org/assets/1/28/9.4_Invasive_Plant_Control_Contracts.pdf)

**I heard Kurt Woolford present at the recent task force meeting. He said that the level of maintenance requirements change over time for wetland banks. What does that mean?**

Mitigation banks have a requirement of a certain standard of maintenance. However, after all the credits are sold that requirement is less stringent. This was covered in the task force meeting that Kurt Woolford attended, as well as the task force meeting in which Kathleen O'Connor, Libertyville Township Supervisor, spoke about the Atkinson Wetland Bank.

**The Park district maintains the detention basin by the school and that costs \$1,000/year. Doesn't that mean that the wetlands will cost \$1,000/acre or more?**

No. Detention basins require a frequent, yearly maintenance. Here's a [link to a document](#) that outlines some of the detention basin maintenance, which must be done yearly. It involves mowing, sediment removal, Function can diminish over time if it is not maintained.

In contrast, wetlands require very little long-term maintenance (ie, maintenance after five years) and is primarily focused on the control and removal of invasive species either by prescribed burns (once every three years), by hand, or by herbiciding. Some landowners choose to mow certain areas of a wetland in the late fall, others do not.

For example, the Lake County Dept. of Transportation recently went out [to bid for plant care, plantings, and weed control for detention basins](#) for one year. The lowest bid was \$55,100 for 27 acres of mowing, 67 acres of weed control, and 21 acres of weed control and native landscaping enhancement, which works out to be approximately \$821/acre.

The Lake County Dept. of Transportation reported that that the maintenance for the Buffalo Creek Wetland Mitigation Bank is \$123/acre for the *first five years*. The Lake County Forest Preserves spends between \$26-\$91 per acre for long-term maintenance for wetlands.

## Wetland Credits

### **Can government entities have wetland banks?**

Yes. Here's [an article](#) from almost 10 years ago (2013) in National Parks & Recreation Magazine (a publication from the National Recreation & Parks Association) outlining the advantages of public park and recreation agencies participating in wetland and stream mitigation projects.

According to the Federal Register / Vol. 73, No. 70 / Thursday, April 10, 2008 / Rules and Regulations 19649: "credits secured by private developers can provide a source of income for public entities to conduct aquatic resource restoration, establishment, enhancement, and/or preservation activities that could not be done under their current budget."

### **How do we know that there will be a market for wetland mitigation credits?**

Wetland credits can be sold as soon as the project is approved by the Army Corps of Engineers. This process takes about one year. However, wetland credits can be sold for one year prior to any construction beginning (excavation, etc.). If the Park District decided to move forward with this project in June 2022, for example, the application could be submitted in 2022 and approval should come sometime in 2023. 30% of wetland credits can be sold when the approval is received.

Close to 200 credits have been sold throughout Lake County in the last eleven years, with more than half being sold since 2018. There are fewer than three wetland credits available in all of Lake County at this time. Since over 100 credits were sold in the last four years (which includes 2020-the year of COVID), it is likely that there will be substantial demand.

### **What is the market geography for the wetland bank credits? Are the purchases restricted to only Lake County entities or is it state-wide or even national in scope?**

Wetland mitigation credits can be sold across county lines but not across state lines. However, since there are so few credits available in Lake County, ACOE may allow the purchase of wetland credits across state lines (ie, Wisconsin).

### **Wouldn't the Park District have to hire a wetland consultant, and wouldn't the consultant get such a large amount of the revenues that it wouldn't be worth it?**

The Park District would NOT need to hire a wetland banking consultant because the bulk of the work that would need to be done by a contracted wetland banker will be paid for by SMC. This is because stormwater storage is necessary to reduce flooding on 41 and surrounding areas. If the Park District declines to participate in this regional flood mitigation project but wants to have a wetland mitigation bank in the future, the costs to create the bank would be borne by the Lake Bluff Park District taxpayers.

These costs include:

- Surveying
- Drain Tile Specialist
- Engineering
- Permitting
- Wetlands Specialist
- Prospectus
- Installation
- Excavation
- Haul-off of materials

**What financial assurances are required?**

Financial assurances are considered to be one of the 12 fundamental elements of a compensatory mitigation plan. U.S. Army Corps of Engineers (USACE) regulations state that sufficient financial assurances or an alternative mechanism shall be required to ensure a high level of confidence that a compensatory mitigation project will be successfully completed in accordance with applicable performance standards. Some parties, such as some state government agencies, do not have the legal authority to post financial assurances but *are able to provide that high level of confidence by executing a formal documented commitment to successful completion of mitigation projects. In some situations that commitment may be a sufficient guarantee of performance.*

**If the LBPD does need to provide a financial assurance (performance guarantee), what would it be for?**

The financial assurance would be to make sure the vegetation meets performance standards. Because the location is already in a floodplain and is identified as a Potentially Restorable Wetlands site, the vegetation is a good fit for the site. The commitment from the anonymous donor can serve as the financial assurance. And the \$1,000,000 from the anonymous donor is more than enough to ensure that the vegetation will meet performance standards.

**What is the approximate cost of what SMC is willing to cover to provide this stormwater storage?**

To excavate a minimum of 40 acre-feet of storage and restore the project area, it would cost approximately \$7,000,000. If the Park District is willing to create additional storage beyond the 40 acre-feet, SMC will cover those costs as well.

**I don't want to see any development there; I'm not a golfer but that's why I spoke in favor of keeping the golf course a few years ago. If it's not a golf course couldn't it be developed?**

If the Park District chooses to make the land into a wetland mitigation bank, regulations require that the land is protected with deed-restrictions in perpetuity. It can never be developed. However, if the property remains a golf course it could be developed in the future since it would not be protected. This would depend on the votes of the Park District and Village Boards.

**This just seems too good to be true. Why would the government pay for this?**

This project is being funded to alleviate the devastating flooding that occurs on Route 41. If there wasn't this flooding project, SMC would not be offering to cover costs to create stormwater storage. When the project is complete there will be no monies to create the storage because it will no longer be needed.

**When I look on a map, it looks like the acreage is closer to 145 acres. Why does your presentation only talk about 105 acres?**

The 105 acres was used in the calculation of the wetland credits. Trails, boardwalks, and shelters can not be used as part of wetland mitigation bank, so approximately four acres were reduced to account for those.

Approximately 30.5 acres was subtracted because the Army Corps of Engineers requests that a 100 foot buffer around the bank be considered as incompatible use. Where the property abuts village land or existing open space there is potential for narrower buffers which could increase the available acreage for wetland mitigation and therefore revenue for the park district. During the prospectus phase the consultants would push to maximize credit acreage.

The consultant (Hey & Associates) also subtracted 10.5 acres because some of the property includes a stream (Skokie River). However, revenue could be generated through streambank mitigation and that has not been accounted for. If the Park District chose not to pursue streambank mitigation, all or a portion of the 10.5 acres would likely be standard wetland bank credit acreage as well. In summary, the available credits could grow by 10.5 acres, either through the creation of streambank mitigation bank or as an addition to the acreage already identified as potential wetland mitigation bank.

**It sounds like Libertyville Township only earned \$6,000 per acre for their wetland bank, but Sandy said that we would earn \$150,000 per acre. Why is that?**

Libertyville Township contracted with a wetland banker. The wetland banker took on the risk and paid the money to develop and maintain the bank until all the credits were sold (ie, spent the money in advance for engineering and construction of the bank). Since SMC is doing all of planning and construction work, and an anonymous donor has offered to give up to \$1 million for the short-term maintenance of the wetlands, it is unlikely that the Park District would need to contract with a wetland consultant at a significant level if at all. Libertyville Township is in the process of creating their third wetland bank and are NOT planning on using a wetland banker. This will allow the Township to reap all the revenues from the sale of the wetland credits.

Lake Bluff Park District Land Use Citizens Task Force  
Questions to the Lake County Stormwater Management Commission

**(responses in bold)**

March 15, 2022

On February 14, 2022, the Lake Bluff Park District Land Use Citizens Task (Task Force) issued a list of questions to the Lake County Stormwater Management Commission (SMC) concerning the request for the creation of stormwater storage on Lake Bluff Park District land, specifically the Lake Bluff Golf Course. The Task Force thanks SMC for its prompt and thoughtful responses to those questions.

In the intervening month, the Task Force has continued its review of SMCs request, and presents below additional questions related to the request. Some of these questions relate to illustrations contained in a *Preliminary Conceptual Plan* (Concept Plan) presented in January, 2022 to the Village of Lake Bluff Board of Trustees. The referenced illustrations are attached to the email transmittal of these questions.

1. One of the illustrations in the Concept Plan identified 105 acres of wetland or wetland buffer created or rehabilitated on Park District property. These 105 acres may generate 77 wetland credits for sale on the open market. (Another illustration identifies 96 acres of wetlands generating 64 wetland credits.) We have a number of questions concerning these plans:
  - a. Is the 77 credit number the SMC projection of the maximum wetland credits that can be generated on the Golf Course property? If not, has SMC calculated a maximum wetland credit projection? **The 77 credit number is a conservative estimate of the maximum number of credits for the entire 145-acre property.**
  - b. Will SMC commit to pay for the construction of wetlands as illustrated in the 105acre/77 credit scenario? If not, is there a maximum acreage construction limit? (See below for another question regarding the definition of ‘construction’). **SMC would request a release of State funding, from Lake County’s regional stormwater appropriation, for the construction of wetlands up to the 77 credit scenario.**
  - c. The Task Force believes that the current Golf Course covers about 145 acres. (The 145 acres excludes the parking lot, recreation center, pool, playground, etc.) Please explain the difference between the Task Force assumption of 145 acres and the Concept Plan use of 105 acres. What are we missing? **There are areas where a full 1:1 ratio of credit will not be possible. Those areas include existing wetlands (no double-counting), enhancement areas, buffers, upland areas etc.**

2. The Concept Plan illustrations contain trails, boardwalks, overlooks, bridges, and other amenities incidental to the establishment of a wetland environment. Will these desirable amenities be paid for by SMC as part of wetland establishment or will these features be the responsibility of the Park District. (Such costs may be offset by the future sale of wetland credits or other means.) Please confirm SMCs financial commitment. **SMC cannot guarantee these desirable amenities will be eligible as stormwater grant expenditures. Currently, we are investigating this question for another wetland project in Waukegan. SMC will provide additional information as soon as possible.**
  
3. In the event that the Park District decides to maintain a golf course on the area used by SMC in the creation of storm water storage, the Task Force understands that SMC will pay for all construction activity and for in-kind replacement of disturbed golf course areas. The Task Force assumes that 'in kind' replacement means vegetative restoration for a golf course of equivalent playable length and quality. Please confirm and elaborate as needed. **SMC will pay for reasonable costs for the restoration of disturbed areas and relocation of conflicting utilities e.g., irrigation system. Typical non-structural areas of restoration include compacted sub-base, topsoil lifts, vegetative stabilization, and erosion control measures. Please provide a typical cross-section detail and specification of the desirable restoration of golf course areas.**
  
4. In the event that the Park District decides to transform into a wetland all or a portion of the golf course on the area used by SMC in the creation of storm water storage, the Task Force understands that SMC will pay for all construction costs including but not limited to
  - a. Surveying, design and engineering for storm water storage, wetland establishment or rehabilitation, and buffer areas
  - b. Permitting and coordination with regulators
  - c. Excavation work, including excavation, grading, material hauling and disposal, etc.
  - d. Topsoil removal and replacement with erosion control planning
  - e. Vegetative planting consistent with wetlands and approved by the regulating authority
  - f. Other costs necessary and typical for the creation of a wetland environment.

Please confirm this understanding. **Yes, the construction costs listed in a. through f. are eligible grant expenditures.** We would appreciate additional information on the planting schemes that would be involved in the creation of the wetland environment and need more information on when SMCs involvement in the development of the wetland would end (for example, when vegetation has been planted, or through one growing cycle, or when approved by the regulator, etc.) **SMC is flexible on reasonable planting schemes for a diversity of native wetland vegetation (not exotic botanical gardens). SMC's involvement can be indefinite, but financial commitments are limited to grant funding terms and availability.**



5. If the Park District wishes to maximize the area of wetland on the golf course property, will SMC pay for wetland establishment on the entire new wetland area that is created or only on the specific areas used for storm water storage. **SMC will pay for all wetland areas to be constructed on the golf course property, including areas outside of the stormwater storage area(s).**
  
6. With respect to a number of functions necessary for the successful creation of a wetland mitigation bank, will SMC perform the following functions on behalf of the Park District?
  - a. Securing permits and regulatory approvals from the U.S. Army Corps of Engineers and/or other regulatory authorities **Yes, with the Park District as the Applicant.**
  - b. Establishing, operating and maintaining a wetland mitigation bank throughout the wetland credit sales cycle. **This is time-dependent relative to our grant funding. However, SMC will provide technical assistance indefinitely. Credit sales are market driven and could be sold out in 1 year, 10 years, or longer.**
  - c. Negotiating wetland credit sales with prospective buyers. **No, this would be a conflict of interest. The Park District should consider whether the bank is a short-term or long-term revenue generating asset.**
  - d. Other tasks typically required in the operation of a wetland mitigation bank. **Depends on specifics. Technical assistance, Yes. Financial commitments will be limited to terms of grant funding and availability.**
  
7. As part of the Concept Plan, a slide presenting *Wetland Bank Cost Estimates* was presented. It identified three cost phases and cost estimates:
  - a. Construction: fully paid by SMC **Yes**
  - b. Short-term maintenance (erosion control, planting natives): estimated at less than \$500/acre; unclear as to whether this is paid by SMC, the Park District or an anonymous donor **Yes, SMC will pay for short-term maintenance within the grant period of performance.**
  - c. Long-term maintenance (controlled burning, herbiciding, re-seeding); estimated at less than \$200 /acre/year; Park District responsibility. **Long-term maintenance will be a responsibility of the landowner (Park District). The cost of \$200 / acre / year is a reasonable estimate.**

Please confirm if these tasks, financial responsibility, and projected costs are correct, especially the short-term maintenance. Would a \$1,000,000 donation be sufficient? **Yes, the donation would be sufficient for short-term maintenance.**

8. The H&H study, Alternative 3, provided two options for storm water storage: 40 acre-feet located on the Lake Bluff Golf Course, or 35-acre-feet located on the Great Lakes Navy Base. Could storm water storage be constructed at both locations (say, 20 acre-feet at the Navy Base and 20 acre-feet on the Golf Course)? **Yes.**

9. The Concept Plan suggests that any wetland construction that is undertaken on the Lake Bluff Golf Course must be completed no later than 2026. Why is 2026 an important trigger date? **The 2026 date assumes backwards planning from State and Federal grant sources. There will always be future grants, but (unlikely) nothing like the current once-in-a-lifetime opportunity for stormwater infrastructure investments.**

Thank you for your answers to these questions. We apologize in advance if, in the spirit of accuracy and completeness, we are sometimes vague or redundant in our questions. Please bear with us as we look for solutions that are in the interests of all parties.

## Park District Finances

### What is the cost to re-work a portion of the golf course or the irrigation system?

Questions pertaining to reworking the golf course would need to be answered by the Lake Bluff Park District or a golf course consultant, like Emergency 9 Golf.

### From Mr. Weber's presentation on October 18 there were certain assumptions made regarding the costs to develop the different courses. Can you provide some background on this?

The Park District would have the information regarding the data on the costs to rebuild a golf course that was part of Commissioner Weber's presentation.

### How much money does the Park District stand to lose if there is no golf course?

Data regarding the present and historical revenue and expenses of the golf course is available through the Park District. However, if the Park District chooses an option that includes the dog park and the soccer field there is potential for revenue from those facilities. The Lake County Forest Preserves has budgeted \$750,000 in revenue for the five dog parks-the yearly fee per dog is \$35 or \$10/visit. We do not have information regarding potential revenue from a soccer field.

### How much money has the Park District made on the golf course?

That information should be available from the Park District.

### What are the long-term capital needs of the Golf Course?

At the January 8, 2018 Regular Board Meeting, the Park District reported that the capital needs for the golf course was \$2,768,058.

### How much does it cost to maintain the golf course per acre?

That information should be available from the Park District.