

Sauk Prairie Conservation Alliance
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September 23, 2015

John Pohlman – LF/6
Wisconsin Department of Natural Resources
P.O. Box 7921
Madison, Wisconsin 53707-7921

Dear Mr. Pohlman,

The Sauk Prairie Conservation Alliance appreciates the opportunity to provide public comment on the Wisconsin Department of Natural Resources Draft Master Plan for the Sauk Prairie Recreation Area. This cover letter, together with the enclosed comments document, represents the Alliance's response to the draft plan and recommendations for improving the Plan. Additional comments addressing the draft plan from a legal perspective will be made on the Alliance's behalf by our attorney Brian Potts of Foley & Lardner.

The Sauk Prairie Conservation Alliance has been involved with the process of determining the future use of the former Badger Army Ammunition Plant lands for nearly two decades, since the decommissioning of the facility was announced in 1997. In 2000 and 2001, we served on the Badger Reuse Committee which, by consensus, agreed to nine values for the future of the property, and criteria for assessing uses and management of the Badger lands based on those values. Since its beginning in 2006, the Alliance has been an active stakeholder member of the Badger Oversight Management Commission, which has the mission of ensuring that the vision of the Badger Reuse Plan is realized. Alliance members have attended and participated in countless hours of meetings of these and other committees, commissions and boards that have had a role in determining the future of the Badger lands. At all these meetings, we have worked alongside representatives of the WDNR, other land owners and interested citizens to create the best future for that land commonly called "Badger."

In addition to these planning efforts, the Alliance has been actively involved with hands-on restoration on several areas of the Badger lands for many years. For at least ten years we have led the efforts to restore what is considered to be the best remnant of original prairie at Badger, the Hillside Prairie. This restoration work began while this property was still under the control of the U.S. Army, and has continued since the land was transferred to the State of Wisconsin for management by the WDNR. Hundreds of hours of volunteer efforts have gone into this restoration project, and many dozens of volunteers have been involved in these efforts. We initiated the creation of the Fordham Prairie that is on land now owned by the Ho-Chunk Nation, and we have worked diligently on the Kindschi Prairie as well as other restoration efforts on the Badger lands.

The Alliance has facilitated numerous public education programs including a ten-evening lecture series spread over three months in the winter and spring of 2000 covering all aspects of the natural and cultural history of the Sauk Prairie. We have coordinated countless field trips for both adults and children at Badger. Only recently, we organized a day-long “Sauk Prairie Day” that featured speakers about the Sauk Prairie and a field trip to remnants of the prairie. Approximately 150 citizens interested in the Sauk Prairie, its history and its future, attended that event.

All of this clearly demonstrates a long-term commitment, significant engagement, and a deep understanding of the issues related to the future of the Badger lands by the Alliance.

The Alliance’s priorities for the Badger lands have been consistent for many years: to provide for the restoration of the native prairie and savanna; to support compatible, low-impact recreational opportunities that allow visitors to enjoy and learn from the natural and cultural features of this land; and to ensure that the Badger lands be cooperatively and collaboratively managed by the landowners.

The Alliance has focused its analysis and the resulting comments on the Plan based upon the commitments, values and information found in several guiding documents created during the nearly two-decade process of determining the reuse of the former 7,400-acre Badger Army Ammunition Plant. While these guiding documents are extensive and detailed, three critical statements encapsulate the guidance review of the Plan. These are:

“The conversion of the Badger lands provides remarkable opportunities for the protection, enhancement, use, restoration, and enjoyment of the property’s unique natural and cultural features. In its work, the BRC has sought to highlight these opportunities and to achieve a realistic, community consensus vision for realizing them.” And *“The Badger property is [to be] managed as a single unit. The managers and owners of land and activities have an affirmative, formal obligation and written agreement to manage the property collaboratively and holistically, and to empower local stakeholders in identifying, discussing, and influencing major management and long-term use decisions.”*

The 2001 Final Report of the Badger Reuse Committee (also known as the Badger Reuse Plan).

“Many groups with varying interests in Badger share a common goal with WDNR to convert it to a recreational property with low impact recreation (hiking, picnicking, primitive camping), prairie, savanna and grassland restoration, environmental education and cultural/historical interpretation with potential for an education center.”

The 2004 WDNR’s application for lands at Badger under the National Park Service’s “Federal Lands to Parks” program.

“Based on this report’s findings, the best overall functional role for the Sauk Prairie Recreation Area is to fulfill the highlighted ecological opportunities available while maximizing compatible recreation opportunities. This approach also takes into consideration the nine key values identified in the Badger Reuse Plan, approved by the Sauk County Board in 2001.”

The 2012 WDNR's Regional and Property Analysis: Sauk Prairie Recreation Area.

Based on the Alliance's review of the Plan, we are pleased with the emphasis on the restoration of nearly all of the 3,400 acres of the Sauk Prairie Recreation Area to prairie, savanna, oak woodlands and other natural community types which were native to this area. This promises to be one of the most extensive prairie and savanna restoration efforts ever undertaken. The restoration of these prairie/savanna/oak woodland communities, in conjunction with the appropriate management of the forest of the south bluffs of the Baraboo Range in Devil's Lake State Park, will provide a large-scale continuum of native habitat types necessary for the survival of many now rare plant and animal species. The Sauk Prairie Conservation Alliance commends the Wisconsin Department of Natural Resources for its far-sighted commitment to this long-term restoration project. Such an extensive restoration effort will require a great deal of resources to accomplish, likely beyond that which the WDNR can provide alone. The Alliance anticipates joining as a partner in working to accomplish this restoration.

Although we are pleased with the significant commitment to restoration in the Plan, the Alliance is concerned about a number of recreation proposals for the SPRA which are not compatible with restoration or with the WDNR's stated commitment to low-impact recreation on this property. We are pleased that the previously proposed ATV trail has been eliminated, but the suggested use of "dual-sport" motorcycles on equestrian and bicycle trails is equally inappropriate and incompatible, even when allowed only on a limited number of days. While the long-distance shooting range that had been proposed for the SPRA is not specifically included in this Plan, the SPRA is still under consideration for such a facility. The Alliance encourages WDNR to clearly state that a shooting range will not be built at the SPRA. The proposal for rocketry in the Plan is also an incompatible recreation activity due to noise, potential contamination, the possibility of user conflicts as well as the risk of a possible unintended fire in a grassland area. While these represent the most obvious of incompatible recreation uses, there are additional concerns detailed in the enclosed comments document.

While dual sport motorcycles, rocketry and a shooting range should clearly be eliminated from the Plan, other appropriate recreational uses could be given greater emphasis to significantly enhance the visitor experience. Primary among them are additional hiking and walking trails. The Plan specifically calls for a single, approximately five-mile long hiking trail from the proposed visitor center to the overlook at the northern edge of the property. The Plan additionally authorizes up to five additional miles of short loop hiking trails at unspecified locations. The Alliance suggests the Plan include a well-defined, extensive hiking trail network that would allow for pedestrian access throughout the entire SPRA property.

In general, the Alliance is troubled by what appears to be an emphasis on recreation over restoration throughout the Draft Master Plan. It is likely this focus originates from the very name given to WDNR's portion of the Badger lands, the Sauk Prairie Recreation Area. In creating what is now called the SPRA more than ten years ago, the issue of which category within the WDNR's land management structure the property should be placed in was evaluated in detail. The decision was made to categorize the project as a recreation area, not because

recreation was to be the primary use of the land, but because WDNR regulations permit the widest range of land management techniques on a recreation area.

In order to undertake the extensive restoration at the SPRA, a full suite of allowable management techniques under the recreation area category is necessary. An understanding of this early discussion and decision seems to have been lost. Because the category “recreation area” is included in the name of the property, the Plan focuses extensively on recreation rather than restoration. In order to resolve this misunderstanding of purpose, the Alliance suggests that the word “Recreation” be removed from the name of the property and replaced with the word “Conservation,” thus *The Sauk Prairie Conservation Area*. While not changing the land management administrative category, it would more accurately portray the intent for this property to both the public and to the WDNR itself.

Finally, the Alliance suggests there be a greater emphasis on collaboration and cooperation with the other landowners of the former Badger Army Ammunition Plant in the creation of the final Master Plan for the portion of these lands managed by the WDNR. These include the Ho-Chunk Nation, the Dairy Forage Research Center, the Bluffview Sanitary District and the Town of Sumpter. The first value of the Final Report of the Badger Reuse Committee Report is to manage the Badger property as a single unit. WDNR was actively involved in that committee and signed the Final Report. While the Alliance recognizes WDNR has specific responsibilities for master planning and management of the lands under its control, it has also made specific commitments during the Badger reuse process to work in collaboration and cooperation on planning and management with the other Badger landowners. The expected degree of collaboration and cooperation is not reflected in the creation of this Plan nor is it apparent in the future unfolding of this Plan.

The comments in this letter, the enclosed comments document and the comments made on the Alliance’s behalf from Foley & Lardner are intended to improve the Draft Master Plan. The Alliance acknowledges the difficulty of crafting a plan for a property as large and complex as the Sauk Prairie Recreation Area. We have attempted to provide thoughtful and thorough comments on the Draft Master Plan. It is difficult, however, to do so in the short 45-day period allowed for response to such a detailed and exhaustive. If there are any questions or concerns about the Alliance’s comments, we would be glad to furnish additional information.

We expect WDNR will carefully consider these and other public comments and will improve the Plan to have a more appropriate focus on restoration and compatible low-impact recreation. We look forward to a revised Plan that we can fully support for final approval by the Natural Resources Board. We anticipate that the Alliance will assist in implementing an improved plan as a fully engaged partner with the WDNR and the other Badger landowners to achieve the vision of a conservation future for the Badger lands.

Sincerely,

Rob Nurre
President, The Sauk Prairie Conservation Alliance

cc:

Wilfred Cleveland, President, Ho-Chunk Nation
Mark Bogess, Director, Dairy Forage Research Center
Robin Meier, Administrator, Bluffview Sanitary District
Tim Colby, Chairman, Town of Sumpter
U.S. Senator Tammy Baldwin
U.S. Congressman Mark Pocan
Wisconsin Senator John Erpenbach
Wisconsin Assemblyman David Considine
Elyse LaForest, National Park Service