

CSWAB

Citizens for Safe Water Around Badger
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August 29, 2013

Wisconsin Department of Natural Resources
Diane Brusoe, DNR Planner - LF/6
PO Box 7921
Madison, WI 53707-7921

SENT BY ELECTRONIC MAIL

Dear Diane,

Thank you for the opportunity to submit comments on the Preliminary Vision, Goals and Draft Conceptual Alternatives for the Sauk Prairie Recreation Area.

We strongly and fully support the recommendations of the Badger Oversight Management Commission, also known as Alternative 4. We also reiterate our steadfast support for the Badger Reuse Plan.

BACKGROUND:

Citizens for Safe Water Around Badger (CSWAB) was organized in 1990 when rural families near the 7,400-acre Badger Army Ammunition Plant learned that private drinking water wells were polluted with high levels of cancer-causing chemicals. In 1992, with the threat of open burning, continued major chemical spills and annual maintenance costs in excess of \$17 million, CSWAB decided to push for Badger's permanent closure and began the work to build a **sustainable future** for these lands.

In the years that followed, CSWAB gained the Army's withdrawal of a proposal to incinerate 1,000,000 pounds of waste munitions, blocked a proposal to open burn 2,500 pounds per day of hazardous waste, and secured comprehensive water testing for neighbors living near the Badger plant. Following six years of resistance, CSWAB's community organizing efforts later ended a proposal to convert the mothballed ammunition plant to commercial production of **varnish, fertilizer, lacquer, and other toxic chemicals**.

Today, hundreds of toxic-laden buildings that were slated for open burning have now been **safely dismantled**, preventing the uncontrolled release of dioxins, lead, asbestos and other toxins to the environment - the culmination of a seven-year campaign led by CSWAB that set a national precedent for innovative non-thermal treatment of contaminated military buildings and infrastructure.

As a member of the Badger Reuse Committee, CSWAB helped lead a cooperative public process in 2001 to develop a common vision for the reuse of the Badger property known as the Badger Reuse Plan. Through our formal endorsement of this plan, CSWAB affirmed its support for land uses that promote an appreciation of the Sauk Prairie landscape through education, restoration, research, **nature-based recreation**, sustainable agriculture, and other activities defined in this plan. As a stakeholder member of the Badger Oversight Management Commission and Land Use Committee, CSWAB continues to work for the fulfillment and realization of the Badger Reuse Plan.

Principal among the values outlined in the Badger Reuse Plan is the commitment to environmental restoration. Value 2 stipulates that the U.S. Army and/or the federal government complete the highest quality cleanup of the Badger property's contaminated land, water, buildings, and infrastructure in a timely manner, and that any land transfers do not entail the transfer of unforeseen cleanup responsibilities or liabilities to any party other than the federal government.

The toxic legacy of industrial operations at Badger remains a challenge but one that can be overcome if the U.S. Army is required to meet its responsibility to fully restore the damage that has been done. This final hurdle will require our collective vigilance, participation and dedication to a safe and healthy future free of military toxins for ourselves and the generations that will follow.

SUMMARY OF RECOMMENDATIONS:

While there is significant publicly-available information concerning known hazardous waste sites and structures at Badger Army Ammunition Plant, there is a tendency to assume that outside these distinct areas that there is little or no potential for residual contamination. These potential environmental health considerations need to be brought to the attention of future owners, site visitors, teachers, workers, hunters, anglers and the public including children, expectant mothers, and other populations at risk. Becoming informed not only protects human health, it also serves as the foundation for successful future use such as grazing, ecological restoration, research, and wildlife habitat.

For these reasons, in areas where site conditions are not well characterized, CSWAB strongly recommends appropriate **independent environmental testing** before prescribed burning, ecological restoration, agriculture, grazing, road construction, and all other site disturbance activities occur. Resources for such testing may be negotiated for prior to transfer and secured as a condition of transfer. In the interim, appropriate signage and other **institutional controls** should be implemented and maintained.

In areas where residual contamination, certain activities and/or site disturbance poses a potential risk to human health or route of exposure, appropriate signage and other institutional controls should be implemented and maintained.

DISCUSSION:

Undocumented releases. Environmental investigations by the Army are only conducted in areas where there is evidence that a spill or release to the environment was likely. Early environmental investigations by the Army, beginning in the 1970's, relied primarily on records searches and interviews with site personnel. Unfortunately, historical records for certain activities such as spills and other environmental releases are limited and in many cases do not exist. Prior to 1970, for example, there are no publicly-available records for chemical spills that may have occurred during

active production and interim years. Environmental sampling is only conducted in specific areas where there is sufficient evidence to justify the effort and associated costs.

CSWAB is not the first group to recommend facility-wide testing for certain contaminants at Badger. In 1983, a facility-wide **Hazardous Materials and Pesticide Management/Control Study** was recommended by the Army however it is our understanding that this study was never conducted. In accordance with Army Regulations 200-1, the Army recommended a special study to "define sources of pollution and develop remedial measures." The basis for the study was that "during normal operations and agricultural leasing over the past forty-plus years, many potential toxic and/or hazardous chemicals and/or pesticides have been used within Badger AAP's boundaries." The Army notes that "no accurate records exist as to type or quantities that may have found their way into the environment." The Statement of Work recommends a "systematic soil sampling and analysis study" for "all areas at Badger AAP." The responsibility for the use, control, and disposal of pesticides at Badger, including but not limited to insecticides, herbicides, and rodenticides, is the responsibility of the U.S. Army Armament Material Readiness Command.¹

At other Army sites, particularly in Kansas, there has been significant **national** discussion concerning **residual pesticide cleanup**. Although RCRA (federal hazardous waste law) generally exempts pesticides from corrective action requirements if they are applied in accordance with their intended use, EPA has maintained that cleanup is now required because the treated buildings are now slated for demolition (so the chemical's intended use no longer applies). The military is challenging the EPA's position, particularly whether the military or the new owners are responsible for cleanup.

In southern states, these pesticides were often applied for treatment of termites. Pesticides used in and around buildings at Kansas Army Ammunition Plant include chlordane, heptachlor, aldrin, and dieldrin. According to the 2004 Environmental Site Assessment for Badger, chlordane was present in Accounts 214 (Section 1006) and 235 (Section 1006A). Also of interest, at Kansas AAP, EPA found that soils contaminated with pesticides around buildings could be co-mingled with other hazardous wastes, including lead from deposition of lead base paint, resulting in a mixture that is also subject to correction action obligations pursuant to RCRA.

It is not unusual to find contamination in unexpected areas at Badger. As recently as 2009, environmental testing detected **explosives contamination** in areas that both regulators and the Army believed were completely unaffected by historical site activities. As part of an ecological risks assessment study by the Army, two areas were selected in a cooperative effort by the Army and the WDNR (Wisconsin Department of Natural Resources). The Army's environmental consultants found the explosive DNT at levels above remediation goals in both areas even though there was no known history of manufacturing activities, spills, or disposal. According to all the information available to the Army, these sites should have been clean and unaffected by historical activities by the Army. DNT is not naturally occurring and was used in the manufacture of military propellants at Badger. DNT is classified by the U.S. Environmental Protection Agency as a probable human carcinogen. According to health officials, exposure to high levels of two forms of DNT (2,4-DNT and 2,6-DNT) may affect the nervous system and the blood. Both are known to cause cancer in laboratory animals.

The Wisconsin Division of Health has determined that the four lesser DNT isomers are as toxic or more toxic than 2,4- and 2,6-DNT. However, the Army has tested soils for **only 2 of the 6 isomers** (forms) of DNT found at Badger. Unlike 2,4- and 2,6-DNT, these less common isomers have not been shown to biodegrade and are therefore expected to be more persistent in the environment.

¹ Department of Army, Headquarters, United States Army Armament, Munitions, and Chemical Command, Environmental Assessment for Total Plant Operations, BAAP, Introduction, Mission and Operations, page 6, July 1983.

While the Army at Badger regularly tests groundwater for all six forms of DNT, the military balked when state regulators issued an order in late 2011 requiring the facility to similarly test contaminated soils. The Army argued that there was not a “clearly identified legal obligation” to comply with the soil sampling sought by the WDNR. State regulators subsequently rescinded the order which would have required the Army to improve testing in areas that are causing widespread DNT groundwater contamination and could pose a potential risk to humans and wildlife.

The use of road oil² has declined in recent years because of reductions in the proportion of unpaved roadways, the presence of highly toxic contaminants in used oils (PCBs, dioxins, furans), competition from other used oil end uses (re-refining), and new environmental regulations.³ Used mineral-based crankcase oil (used motor oil or used engine oil) contains polycyclic aromatic hydrocarbons (PAHs) and may contain metals such as aluminum, chromium, copper, iron, lead, manganese, nickel, silicon, and tin.⁴

U.S. Army records confirm that road oil was indeed present at Badger – and in extremely large quantities. A July 1983 report published by the U.S. Department of Army documents that Badger Army Ammunition Plant had a 52,000-gallon above ground tank that was used for storing road oil.⁵ A 1977 building inventory by the U.S. Army identified the same facility as “road oil storage.”⁶ By comparison, other used oil storage tanks at Badger held only 500 to 1,000 gallons.

Badger Army Ammunition Plant has an extensive network of more than 130 miles of roads.⁷ While many of the roads in the core industrial area are paved, the majority of outlying roads at Badger are unpaved.

Reliability of Data. In other areas where independent environmental testing has been conducted, results contradict those that the Army reported to the public. In 2007, the Army tested sediments at Gruber’s Grove Bay on Lake Wisconsin and reported that all samples throughout the bay were below the approved cleanup goal of 0.36 parts per million (ppm) for mercury. The WDNR conducted independent sampling of bay sediments and found that the majority of samples (6 out of 8) failed to meet the cleanup goal of 0.36 ppm. The highest concentration found was 9.0 ppm, making it one of the worst mercury-contaminated sites in the state even after two remedial actions involving dredging and sediment removal.

As recently as September 2008, WDNR representatives said that the Army continues to find building foundations and other structure remnants where none were expected. Many of these areas were subsequently tested and required remediation.

² The term “road oil” refers to any heavy petroleum oil that is used as a dust suppressant and surface treatment on roads and highways. Source: County of Santa Barbara Planning and Development Energy Division, *Oil and Gas Glossary*, undated.

³ United Nations Environment Programme, Secretariat of the Basel Convention, *Basel Convention Technical Guidelines on Used Oil Re-Refining or Other Re-Uses of Previously Used Oil, Basel Convention on the Control of Transboundary Movements on Hazardous Wastes and Their Disposal*, September 1995.

⁴ U.S. Army Toxics and Hazardous Materials Agency, Public Health Statement for Used Mineral-based Crankcase Oil, September 1997.

⁵ Department of the Army, Headquarter, United States Army Armament, Munitions, and Chemical Command, Environmental Assessment for Total Plant Operations, Badger AAP, July 1983.

⁶ U.S. Army Toxics and Hazardous Materials Agency, Installation Assessment for Badger Army Ammunition Plant, May 1977.

⁷ General Services Administration, Preliminary Highest and Best Use Analysis, Badger Army Ammunition Plant, May 15, 1998.

Asbestos Risk Assessment. On June 21, 2012 CSWAB submitted a formal petition urging state regulators to require environmental testing for asbestos in soils on former Badger lands. Asbestos fibers found in soil can become airborne as the result of site disturbance by wind, weathering, or human activities. Unlike most minerals which turn into dust particles when crushed, asbestos breaks up into fine fibers that are too small to be seen by the human eye.

Exposure to asbestos fibers through inhalation has been associated with lung cancer, mesothelioma, and other cancers, as well as asbestosis and other nonmalignant respiratory diseases. The toxicity of a given asbestos fiber depends on a number of variables including chemical composition, fiber shape, and fiber size.

The effects of asbestos on children are thought to be similar to adults, however, children could be especially vulnerable to asbestos exposures because they are more likely to disturb fiber-laden soils or indoor dust while playing, they are closer to the ground and thus more likely to breathe contaminated soils or dust.⁸ Children have faster breathing rates that may increase the level of exposure to asbestos and children could be more at risk than those exposed later in life because of the long latency period between exposure and onset of asbestos-related respiratory disease.

CSWAB has asked the WDNR to require soil testing using polarized light microscopy which is capable of detecting asbestos fibers not visible to the human eye. The Army is currently required to remove only visible pieces of asbestos-containing materials generated during building demolition to qualify for clean site closure.

The test method sought by CSWAB is recommended by the U.S. Environmental Protection Agency and has been used at other Army bases around the country including the Radford Army Ammunition Plant in Virginia, the Ravenna Army Ammunition Plant in Ohio, and the Seneca Army Depot in New York State.

Activities that Could Liberate Asbestos and other Contaminants. Activities such as prescribed burning may liberate certain contaminants that are found in soils at Badger, including those that are readily taken up by plants. Toxic metals, in particular, are a concern as burning does not destroy these contaminants and may cause the dispersal of soil and plant contamination to the air often as respirable particulates. Through inhalation, incidental ingestion, and, to a lesser degree, dermal exposure both adults and children may be exposed to emissions and fugitive dust.

Proposed deed restrictions on properties pending transfer include no commercial, residential (including any type of educational purpose for children/young adults in grades kindergarten through 12), utility, or subsurface recreational use; no use of groundwater without United States Department of the Army and WDNR approval; and no digging or disturbance of soils within certain areas at Badger. Prohibited ground intrusive activities in certain areas include raking, scratching, scraping, tilling, moving, digging, excavating, and plowing.⁹

⁸ U.S. Department of Health and Human Services, Agency for Toxic Substances and Disease Registry, Division of Health Assessment and Consultation, Health Consultation, W.R. Grace Newark Plant, Newark, California, September 22, 2005.

⁹ U.S. Army, Finding of Suitability to Transfer, (FOST), Badger Army Ammunition Plant (BAAAP), Parcels O, O1, O5, Q2, U2, and X1, October 2008.

SPECIFIC RECOMMENDATIONS:

Signage and Institutional Controls. For many years, CSWAB has actively encouraged future owners to address data gaps sooner rather than later. Once identified, risks are much more likely to be addressed while there is still an Army presence at the base. In such cases, comprehensive independent environmental testing may be the only means to define these risks and leverage adequate remediation. In the interim, appropriate signage and other institutional controls should be implemented and maintained.

Propellants and Munitions Constituents. Fixed or semi-permanent activities which are expected to release propellants, by-products of combustion, or munitions constituents should be eliminated or deferred. Proposed recreational activities such as a skeet/shooting ranges or other activities involving the use of firearms or propellants would be expected to release many of the same contaminants associated with historic munitions production and disposal activities at Badger. As a result, such activities could blur the lines of responsibility in terms of identifying potential responsible parties. If DNT or PAH contamination, for example, was detected subsequent to transfer, the military would be expected to argue that these public activities had caused or contributed to the contamination. Again, independent environmental baseline testing would protect the State from potential future liabilities and associated cleanup costs.

Clean Water Act. We concur with the recommendation to consider adding the Ballistics Pond and other surface waters at and near Badger to the Impaired Waters List. On March 11, 2004, CSWAB formally petitioned the WDNR to add the Ballistics Pond to its Impaired Waters List pursuant to the Clean Water Act. The organization also asked that the Oleum Pond, the Wood Duck Pond, Gruber's Grove Bay, and all other surface water, wetlands and springs in and near Badger Army Ammunition Plant be added to and/or remain on this registry. The Federal Facilities Compliance Act requires that federal entities, including the U.S. Department of Defense, comply with all environmental law including the Clean Water Act. If the Army is not held appropriately accountable, this responsibility and liability may fall to the State.

Children, expectant mothers, and other populations at risk. Based on current site knowledge, CSWAB recommends the following:

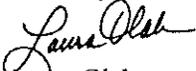
- Children, expectant mothers, and other susceptible populations such as the elderly and those with compromised immune systems should avoid certain areas and buildings at Badger that may contain lead, explosives, PCBs, asbestos, and other toxic substances.
- Children, expectant mothers, and other susceptible populations should avoid direct contact with soils and inhalation of fugitive dust in certain areas at Badger.
- Children, expectant mothers, and other susceptible populations should avoid exposure to sediments at Gruber's Grove Bay. Bay sediments contain elevated levels of mercury and other toxic metals.
- Children, expectant mothers, and other susceptible populations should avoid exposure to smoke and fumes from prescribed burning and decontamination activities in certain areas at Badger.
- All people should limit consumption of fish from the Ballistics Ponds and other ponds at Badger as consistent with guidance from the Wisconsin Division of Health.
- Children, expectant mothers, and other susceptible populations should not consume fish from the Ballistics Pond at Badger. This advisory extends to all ponds where data is unavailable.

ADDITIONAL COMMENTS:

CSWAB has previously submitted more detailed formal comments and recommendations to the State including comments on Findings of Suitability of Transfer for all parcels that have been transferred to the State of Wisconsin.

Thank you for your time and consideration of our comments.

Sincerely,

A handwritten signature in cursive script that reads "Laura Olah".

Laura Olah
Executive Director

Electronic file attachments (3)



Wisconsin ATV/UTV Association, Inc. (WATVA)
1539 N. 33rd Place, Suite A
Sheboygan, WI 53081
Phone (920) 694-0583
www.watva.org

August 28, 2013

Diane Brusoe, diane.brusoe@wisconsin.gov
Wisconsin Department of Natural Resources
101 S. Webster St.
Madison, WI 53709

Cc: Secretary Cathy Stepp, cathy.stepp@wisconsin.gov
Wisconsin Department of Natural Resources

Re: WATVA Comments on the Sauk Prairie Recreation Area conceptual alternatives.

The Wisconsin ATV/UTV Association appreciates the time and effort that the Department has expended in order to provide a variety of visions for the former Badger Army Ammunition Plant.

In order to make our input easier to review, we have made some general comments.

Comments

- WATVA is in favor of management alternative #3. In a previous edition of the SCORP it was clearly shown that motorized recreation has been exceedingly underserved in Southern Wisconsin for many years and this is a large property that can and should provide for all recreational interest.
- Reasonably priced land in Southern Wisconsin is very rare and this property would be an economical, low cost alternative for filling the void for a potential motorized riding area that the Natural Resources Board authorized DNR staff to further investigate.
- Location of this property is near urban areas and major highways and large numbers of Wisconsin residents and out of state visitors will be drawn to the Sauk Prairie Recreational Area and surrounding region as a family vacation destination.

- This particular site would have a low environmental impact since it has been damaged and classified as a Brownfield by the Federal Government, but there is no reason that the natural beauty of this site can not be restored and combined with motorized recreational activities and other interests groups.
- Construction of trails and facilities would minimally impact the environment and existing habitats.
- WATVA would encourage the DNR to create a combined motorized perimeter trail on the property in addition to the proposed riding area to reduce the concentration of use in one specific zone.
- WATVA has more than 20 ATV/UTV clubs in favor of a motorized riding area within an hour's drive of the property and this project would also receive broad support from other motorized user groups, private sector businesses and possibly corporate sponsors.
- Alternative 3 will not only serve the ATV/UTV community and other motorized users, but it could also provide training and educational facilities for other outdoor recreation that would appeal to a wider base of users.

The Wisconsin ATV/UTV Association and its 100 Chapter Clubs, its many businesses and travel partners that provide an invaluable economic stimulus to the surrounding counties and areas thank you for this opportunity to present our comments on the Sauk Prairie Recreational Area.

We welcome the opportunity of partnering with the Wisconsin DNR to provide enjoyable and safe trails for recreational users into the future.

Please feel free to call our state headquarters office for any clarifications or questions you might have about our input or our comments.

Sincerely,

Randy Harden

Randy Harden – President

WATVA Trails Committee

Rob McConnell

Rob McConnell – Vice President

WATVA Board of Directors

Wisconsin ATV/UTV Association's Annual
VIP Ride & Workshop



Friday, September 20th, 2013
Dyracuse Recreational Park
1047 County Road 0, Nekoosa, WI
Town of Rome, WI

SAFETY BRIEFINGS FROM CERTIFIED INSTRUCTORS!



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**Wisconsin ATV/UTV
Association Inc.**

www.watva.org | www.vipride.org

VIP RIDE DETAILS

Event Information:

The WATVA Annual VIP Ride is once again providing a chance for our "very important persons" and/or their staff to ride an ATV or UTV on a Wisconsin funded trail system and visit with members of our office and volunteers.

Lawmakers, their staff, agencies, tourism officials and other VIP's are invited to the Dyracuse Recreational Park for this day.

Schedule:

The VIP ride opens at 11:00 a.m. with a reception and lunch meeting. We will start riding shortly thereafter. Riding opportunities throughout the day will be available using demonstration ATV's / UTV's by our industry partners. Discussions are held throughout the day with various representatives about topics of your choice.

Location:

This years VIP ride will be held at the Dyracuse Recreational Park located in the Town of Rome, WI. The park is about an hour and a half North West of Madison. The park is located at 1047 County Road O, Nekoosa, WI.
Park Contact:
Jon Sonnenberg: 715-325-8017.



Discussions:

The WATVA VIP Ride is a great place to discuss legislative objectives and expand your business networks with industry specialists from around the state. We encourage casual discussions throughout the day!

New Location for 2013!
Dyracuse Recreational Park
1047 County Road O, Nekoosa, WI
Town of Rome, WI



What To Bring:

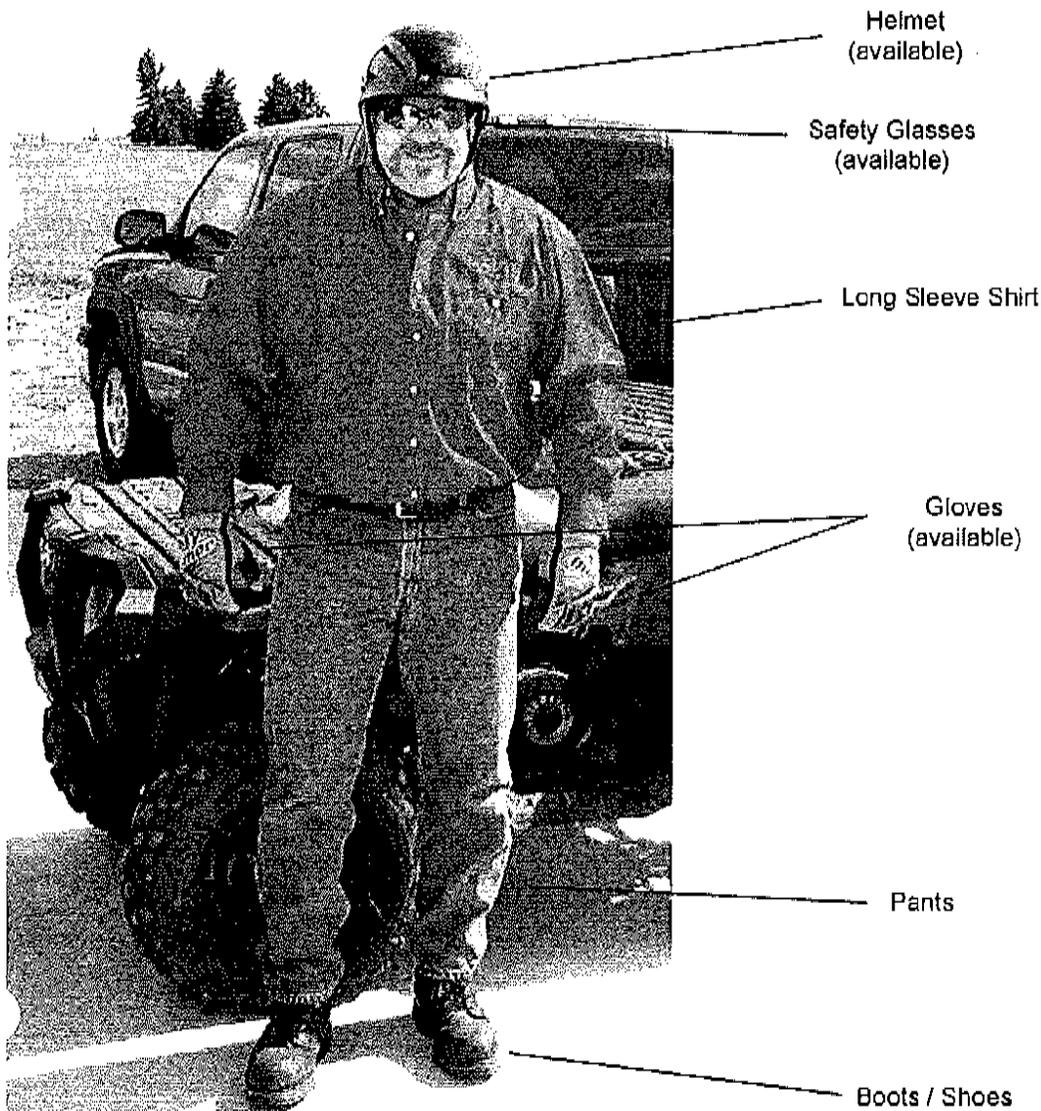
Our VIP ride is held rain or shine, and in the past we've had our share of rain! We suggest bringing a change of clothes in case you encounter some mud on the trails. If you have your own helmet, please feel free to bring that along with any other gear of your choosing. If you don't have any safety gear don't worry, we have a large selection of helmets, goggles and gloves for everyone.

What To Wear:

Our VIP ride / appreciation ride requires the following minimum safety gear to ride:

- Helmet with eye protection
- Gloves
- Long pants
- Boots / Shoes (no sandals)

Helmets and eye protection will be provided to those that need it.



SAFETY COURSE & REGISTER



Safety Course Information:

Wisconsin has mandatory safety education for anyone riding a public trail. The requirement for this certification is:

Anyone who is at least 12 years old and anyone born on or after January 1, 1988. These ATV operators must carry their safety certification card and they must display it to law enforcement officers when requested. This year, 25 year old and younger riders are affected.

Exception: In 2013, the Wisconsin ATV Association helped pass legislation to exempt the mandatory safety education rule during an organized demonstration ride. The VIP falls under this type of event so participants do not need to have any ATV safety certificate.

A brief introductory safety course will be conducted on site for those that do not know how to ride. This is not the same DNR safety course mentioned above.

Register:

To register for the WATVA VIP ride please visit our web site, www.watva.org and click on VIP Ride on the right side of the page. You can also email info@watva.org with the names of the representative and staff attending, club member names or WATVA member name. You can call our office at (920) 694-0583 or write us at:

Wisconsin ATV Association Inc.
1539 N. 33rd Place, Suite A
Sheboygan, WI 53081





John Muir Chapter

Sierra Club - John Muir Chapter
222 South Hamilton Street, Suite 1, Madison, Wisconsin 53703-3201
Telephone: (608) 256-0565 Fax: (608) 256-4562
john.muir.chapter@sierraclub.org <http://wisconsin.sierraclub.org>

August 21, 2013

Diane Brusoe
LF/6, WDNR Planner
Wisconsin DNR,
PO Box 7921, Madison, WI 53707
Diane.Brusoe@wisconsin.gov

Dear Ms. Brusoe:

The Sierra Club - John Muir Chapter, which represents 15,000 members and supporters throughout Wisconsin, submits our comments in strong support of a Master Plan for the Sauk Prairie Recreation Area that balances low-impact recreation with ecological restoration and high quality environmental education. Protecting this sensitive, unique area – while also encouraging its responsible use – embodies the spirit of our organization’s mission of enjoying, exploring, and protecting earth’s wild places.

The former Badger Army Ammunition Plant lands offer some of the finest remnant tracts of tall-grass prairie/oak savannah habitat in Wisconsin. It is critically important to protect as much prairie habitat as possible, since we know that 98% of prairie ecosystem habitat has been lost over the past 150 years. Moreover, climate change makes protecting remnant prairie even more important for providing large tracts of high quality habitat needed to sustain native plants and animals that are sensitive to changing precipitation levels and temperatures. Grassland birds found in this area include the eastern and western meadowlark, bobolink, dickcissel, and grasshopper sparrow. The redheaded woodpecker thrives best in this now-rare savannah habitat.

The WDNR’s proposed Master Plan for the 3,800 acre Sauk Prairie Recreation Area outlines some of the landscape goals that can be achieved by protecting this area, including restoring and enhancing grassland and oak savannah; enhancing the transition zone between the Baraboo Hills and Badger Prairie; and enhancing the corridor from the Baraboo Hills to Devil’s Lake State Park to the valley of the Lower Wisconsin State Riverway.

We have serious concerns about the potential for habitat destruction and invasive species introductions that could occur as a result of allowing higher impact activities in this sensitive area, such as installing a shooting range or allowing ATV’s and other forms of motorized recreation. The Sierra Club feels that these types of high impact recreation are incompatible with ecological restoration and grassland bird protection. The other concern is that high intensity recreation was not part of the *Badger Reuse Plan* for the area that was previously approved by a

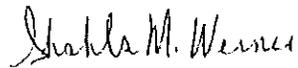
broad group of stakeholders and landowners, including the WDNR, the Ho-Chunk Nation, the U.S. Dairy Forage Research Center, and the Sauk County Board of Supervisors.

The WDNR's online public survey on the management of Sauk Prairie Restoration Area includes options for doing nothing, for allowing ecological restoration and minimal undeveloped recreation and education, and for allowing high intensity recreation. The survey fails to offer Badger Oversight Management Alternative 4 (BOMC), supported by the Sierra Club and several other groups, that allows for a range of low-impact activities, including cross country skiing, hiking, hunting and fishing (as long as lead-free shot and tackle are used); environmental education (including a visitor center); and ecological restoration. I urge you to seriously consider the balanced approach described above that protects sensitive species while still allowing for a range of recreational uses and high quality environmental education in this wonderful area. Thank you for accepting our comments today.

Sincerely,



Will Stahl, Conservation Chair
Sierra Club – John Muir Chapter



Shahla Werner, Director
Sierra Club – John Muir Chapter



Community Conservation

~www.communityconservation.org~

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Gays Mills, WI 54631

Phone (608) 735-4717
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RECEIVED

APR 11 2013

FACILITIES AND LANDS

August 15, 2013

Diane Brusoe, DNR Planner - LF/6
Wisconsin Department Natural Resources
P.O. Box 7921
Madison, WI 53707

Dear MS Brusoe and others concerned with the Badger lands.

I am very happy that the Wisconsin Department of Natural Resources is making some decisions on the conversion of the Badger Army Ammunitions Plant lands. I have been involved with the fate of the BAAP lands since 1997, working with Citizens for Safe Water Around Badger (CSWAB), and the initiation of the Community Conservation Coalition for the Sauk Prairie (CCCSP) in the late 1990s – now known as the Sauk Prairie Conservation Alliance (SPCA). What grew from these early beginnings was a community-driven process that established in 2000 the Badger Reuse Committee, composed of 21 members representing a variety of governmental bodies (including the Ho-Chunk Nation) and community groups. Out of this impressive democratic process emerged the Badger Reuse Plan in 2001 that was endorsed by the Sauk County Board of Supervisors, the Ho-Chunk Nation, and the Wisconsin DNR, among many others.

I mention this brief history because the Badger Reuse Plan was accepted as the guiding plan for the Badger lands. For some reason, however, parties either unfamiliar with or ignoring the history of this work and the complex democratic process that transpired have included options in Alternative 3 that are opposed to the Badger Reuse Plan's clear recommendations of only low-impact recreational uses, and for conservation and restoration of the land's natural conditions. These recommendations in turn provided the basis for the agreement for land transfer to the WDNR. Uses such as a rifle range, an all-terrain vehicle track, and paint ball games run counter to the hard-won consensus in the Badger reuse Plan. So I therefore find Alternative 3 unacceptable, and I wonder if this means that the DNR is not honoring its previous agreement.

I am in favor of Alternative Plan 4 that has been proposed by members of the Badger Oversight Management Commission, and that I have attached. Alternative 4 is in compliance with the original agreement of the Badger Reuse Committee for low-impact use.

In order to promote global biodiversity and sustainable land use, Community Conservation, Inc. catalyzes, facilitates and empowers local people to manage and conserve natural resources within the social, cultural and economic context of their communities.

Thank you for considering my comments and I sincerely hope that the WDNR will choose a modified plan option that honors their earlier commitment.

Sincerely,

A handwritten signature in blue ink that reads "Robert H. Horwich". The signature is written in a cursive style with a large initial 'R'.

Robert H. Horwich, Ph.D.
Director

BADGER OVERSIGHT MANAGEMENT COMMISSION

Recommendation on Sauk Prairie Recreation Area Draft Conceptual Land Use Alternatives

ALTERNATIVE 4

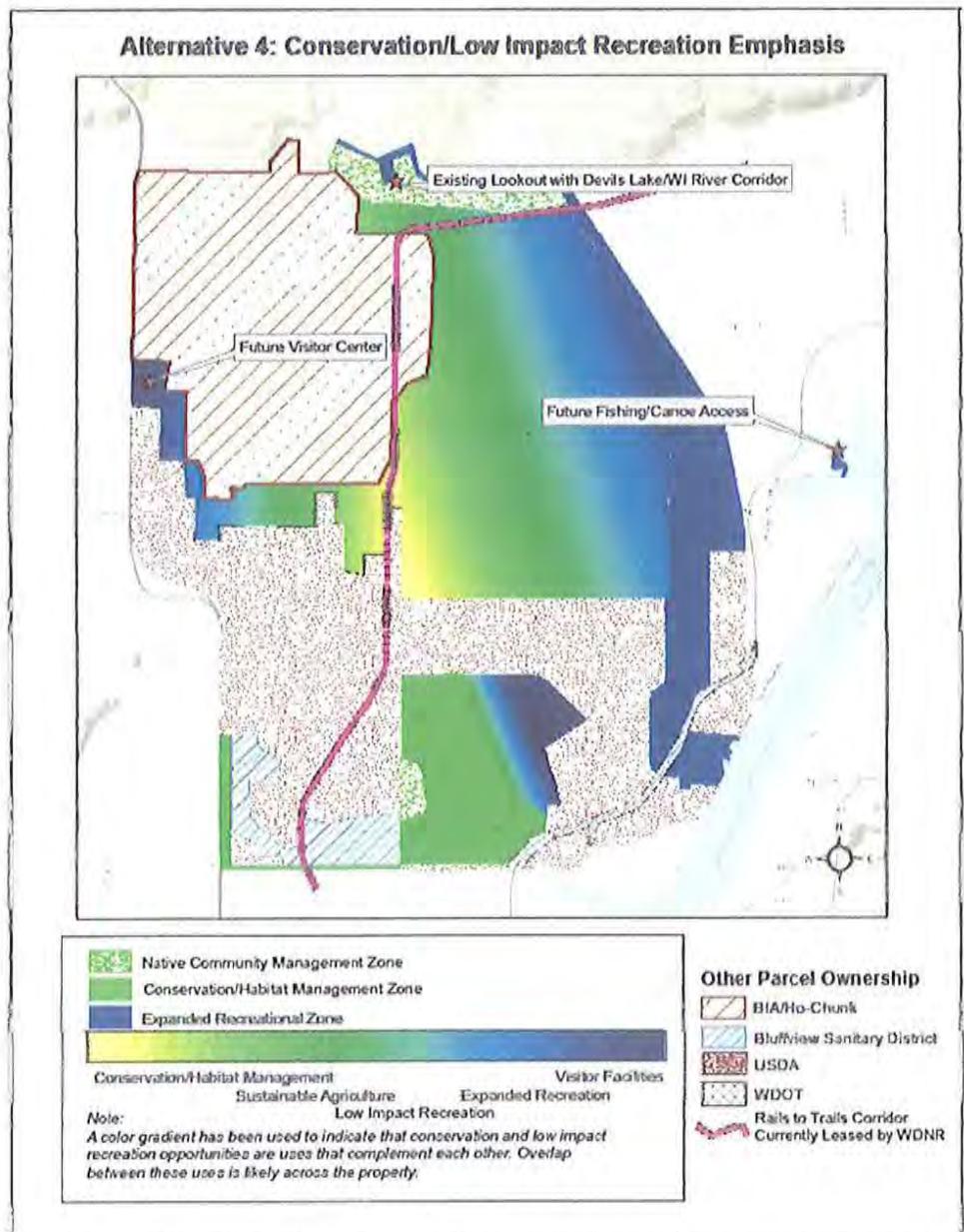
Conservation/Low Impact Recreation Emphasis

The 2001 Badger Reuse Plan was an agreement entered into by 21 representatives of local, state, federal and tribal units of government as well as neighboring landowners, businesses, school districts and nonprofits. The plan emphasizes conservation and low-impact recreational activities and it is still in effect. The National Park Service agreement with DNR (Wisconsin Department of Natural Resources) also emphasizes conservation and low-impact recreational activities. Alternative 4 below continues this emphasis on conservation and low-impact recreation uses.

Under this management alternative, emphasis is placed on land uses and management objectives that complement each other and those of the surrounding land owners, enhancing the health, culture, and economy of the Badger lands and the surrounding community. This alternative views current planning and implementation efforts as the most recent expression of a long history of human activity on the Sauk Prairie, and as an opportunity to honor the sacrifices and contributions of our ancestors. It acknowledges the legacy of conflict that has marked previous chapters of human experience on the Sauk Prairie, and advances the process of reconciling these conflicts.

Healing the land is an essential step in that process, and at Badger, healing the land is a "re-creational" activity of the first order. Ecological restoration projects, aided by collaborative agricultural, educational, and scientific research programs, will support enhanced understanding and appreciation of Badger's wildlife and its natural and cultural history, and demonstrate new ways to secure healthy, thriving human and natural communities. The history of all the people who have made the Sauk Prairie home over thousands of years will be shared. That history will include the story of the Badger Army Ammunition Plant and will continue through the current efforts to develop and implement the consensus vision for the future of this long contested site.

Opportunities for outdoor recreation will include traditional activities (such as hunting and fishing) that have long been among the varied uses of the Badger property, and that contribute importantly to greater awareness of Badger's full conservation value. Of particular value are the property's important populations of grassland birds. The presence of these birds and other wildlife will attract thousands of visitors, as wildlife viewing continues to expand in popularity in the coming decades. Because the benefits of peace and quiet are among the most rapidly diminishing natural resource values in our contemporary environment, and consequently are among the frequently most sought after, a wide variety of low-impact recreational activities will be accommodated. The opportunity to explore the Badger property, especially given the promise of a regional recreational trail linking the



Sauk Prairie Recreation Area to nearby major regional trails, will draw thousands more to the area. Their experience of the area will be enhanced by interpretive trail signage and guided tours.

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study new ways to combine agricultural production with the conservation and restoration of soils, water, wildlife, forests, grasslands and wetlands. Research and demonstration of innovative conservation agriculture practices such as managed, rotational livestock grazing to help control invasive plants and woody vegetation will benefit the land, our farming neighbors, Badger's recreational users, and the people of Wisconsin. Private landowners, volunteers, students, and community organizations will come to Badger and play an active role in these land restoration and stewardship activities. As Badger's landowners work together with visitors, neighbors, and partners, a changing landscape of row crop, pasture, restored prairies and savannas, and woodlands will provide a valuable model, showing how Wisconsin's land can support an agricultural economy that enhances farm families, local economies and farm communities, and healthy populations of native birds and other wildlife, in a public setting that can be enjoyed and appreciated by generations to come.

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- Remove any unwanted infrastructure, buildings or debris that remains on the property, with the exception of infrastructure that may provide bat habitat and support bat research.

Note (*): The use of the term "Zone(s)" above is to maintain compatibility with language in other DNR proposed alternatives; BOMC members feel this term in most cases is too restrictive and exclusive for Badger lands which often have characteristics of one or more zone types in one area. Exclusive use zones may conflict with the first Value of the Badger Reuse Plan: to manage Badger as a whole.



HOW YOU CAN HELP:

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RIVER ALLIANCE of Wisconsin

306 East Wilson Street, Suite 2W

Madison, WI 53703

608/257-2424

www.wisconsinrivers.org

July 26, 2013

TO: Diane Brusoe, Wisconsin Dept. of Natural Resources
FROM: Denny Canoff, Executive Director
RE: Sauk Prairie Recreation Area Master Plan

Dear Ms. Brusoe:

Please consider our comments for the public record regarding the master planning process for the former Badger Army Ammunition Plant site (BAAP), in Sauk County.

The River Alliance is a nonprofit river conservation organization based in Madison, with over 3,000 individual, business and group members. We are concerned with the health and well-being of the state's 55,000 + miles of rivers and streams. One of the state's riverine gems, the Wisconsin, provides part of the eastern boundary of the site, and tying together this well-established gem with the newly emerging and doubtless future gem that is the Sauk Prairie Recreation Area is of great interest to us. The proposed SPRA represents a rare opportunity to create a unique space for habitat, low-impact recreation, and even forms of compatible agriculture.

As you know, a great deal of planning, meeting, negotiating, mapping, and more meeting and negotiating, led to the Badger Re-use Plan, in 2001. That plan remains a solid, community-driven basis for considering the future fate of those properties.

That the DNR built some of its planning on the Re-use Plan is evident in the agency's draft master plan for the site. This is encouraging. We especially applaud Alternative 2, as it hews most closely to the original Re-use Plan, a document that best reflects the wishes and vision of the local community and other important stakeholders.

The emphasis on ecological restoration, nature-based recreation, community participation, and interpretive and educational activities, described in Alternatives 2 and 3, is something we support.

However, we are dismayed to see a call, in Alternative 3, for a "Special Use Zone" carved out of the site for possible hunting and motorized vehicle use.

One could argue that the 500 or so acres proposed for such uses take up a relatively small percentage of the total land base of the proposed SPRA. But those kinds of activities are of course disproportionate, in their reach of noise and threats to safety, to the amount of land devoted to them.

Moreover, these kinds of uses were not spelled out or called for in the Re-use Plan, a document that still reflects community and stakeholder wishes. Calling for a shooting range or ATV trail seems like insensitive disregard to that community process. It also appears that such proposed activities would put the site in conflict with agreements made with the National Park Service. It's my understanding that the proposed special use area would, unfortunately, occupy high-quality oak savannah and even an historic cemetery.

It behooves the Department to seriously consider a fourth alternative, being proffered by the Sauk Prairie Conservation Alliance that nicely balances the ecological restoration and recreational goals for this site. We endorse that effort.

Finally, the Department's draft plan seems to pass on a unique opportunity for agricultural research that could demonstrate how certain farming or grazing practices could be compatible with ecological restoration and recreation. Private landowners can't always afford such experiments, and it makes sense to devote public land to such endeavors. We urge the DNR to take the advice of those who understand this potential for the SPRA.

I appreciate your consideration of our comments.



Founded in 1973 by
Ronald Sauey, Ph.D. (1948-1987)
and George Archibald, Ph.D.

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Belinda Wright

July 19, 2013

Diane Brusoe
Department of Natural Resources
101 S Webster St.
Madison, WI 53707

Dear Ms. Brusoe,

For the past four decades, the International Crane Foundation has worked globally to save cranes and wetlands, grasslands, and other ecosystems on which they depend. Central to our mission is the restoration and management of natural landscapes that support cranes, many other species, and our own (human) communities. We work worldwide, but we are proud to call Wisconsin and Sauk County our home.

Since time immemorial the beautiful forms, colors, and songs of grassland birds have been a feature of the landscapes of southern Wisconsin. Regionally, our native grasslands once extended from Wisconsin to the foothills of the Rocky Mountains, and from Canada to the Mexican border. In southern Wisconsin, as throughout the region, more than 99% of our native grasslands have been lost, many of them converted to agricultural crops. Healthy grasslands—our prairies and savannas—are now the rarest ecosystems in North America.

Wisconsin's agricultural landscapes have many important conservation values and can serve as valuable grassland bird habitat. Aldo Leopold described the abundance of Bobwhite Quail and other grassland birds on the pastured grasslands of the Sauk Prairie. Unfortunately, changes in agricultural practices over the last several decades have changed this reality. This loss of healthy native and pastured grassland has resulted in a catastrophic decline in grasslands birds throughout the entire Midwest. It constitutes a real threat to our ecological and human economic health.

One of their few remaining strongholds for grassland conservation in southern Wisconsin has been the Badger Army Ammunitions Plant (BAAP). BAAP offers a unique and wonderful opportunity for large-scale grassland protection and restoration, immediately adjacent to our treasured Baraboo Hills and Devil's Lake State Park. The value of such a restoration would be enormous for the natural diversity of our region, including many species of conservation concern that the Wisconsin Department of Natural Resources has worked to save for decades.

International Crane Foundation

E 11376 Shady Lane Road
P.O. Box 447
Baraboo, WI 53913-0447, USA

608-356-9462
608-356-9465 fax
cranes@savingcranes.org
www.savingcranes.org

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JUL 18 2013

FACILITIES AND LANDS

For these reasons, the International Crane Foundation strongly supports “Alternative 2: Ecological Restoration Emphasis” for the proposed Sauk Prairie Recreation Area. Furthermore, we feel strongly that some of the activities proposed in Alternative 3 are incompatible with the full conservation vision for the Badger Army Ammunition Plant.

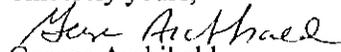
In early 2000, a Badger Reuse Committee (BRC) was established that included 21 representatives of state, local, federal, and tribal governments, local businesses, landowners, school districts, and non-profit organizations. (The committee included three representatives of the State of Wisconsin, on behalf the Governor’s Office, the Department of Administration, and the Department of Natural Resources.) From July 2000 to March 2001 the BRC met dozens of times. Through comprehensive, community-based involvement, the committee developed a consensus Badger Reuse Plan for the BAAP that was subsequently supported and adopted by the many diverse stakeholders at Badger. The BRC report allowed the recommendation to move forward, that the U.S. National Park Service sponsor the transfer of land within the BAAP to the State of Wisconsin, to be administered by the Wisconsin DNR.

“Alternative 2: Ecological Restoration Emphasis” comes the closest to keeping with the recommendations of the BRC, the voices of the people in Sauk County, and the interests of all those involved at the Badger property. We hope that Alternative 2 will be implemented. We further hope that it can be elaborated to include the unique opportunities at Badger—many of which are in fact included in alternative 3—for appropriate recreational, educational, research, and agricultural activities. This is the only way it can remain a refuge for our grassland birds, while demonstrating how wise land use, healthy local economic development, and preservation of cultural values can work together.

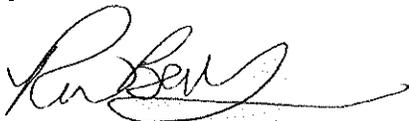
There are so many other places near the BAAP where several of the suggested recreational activities are better suited, and where they can be undertaken. Our area contains many private-sector shooting ranges, and other motorized trails in southern Wisconsin provide a better recreational experience than would a small, confined area within Badger. Surely it is reasonable and ethical for the Wisconsin DNR to dedicate its portion of the BAAP property primarily to the conservation of the vanishing tallgrass prairie ecosystem—for its special suite of grassland birds, for all the other wildlife its supports, and for the people of Sauk County and Wisconsin. Surely this is the best way to commemorate the sacrifices of those who have come before us on the Badger lands.

On behalf of the International Crane Foundation, we urge you to support Alternative 2, and to be part of the historic decision to save and restore the great Sauk Prairie.

Sincerely yours,


George Archibald

Co-founder/Senior Conservationist



Richard Beilfuss, Ph.D., Lic Prof Hydrologist
President & CEO



THE SAUK PRAIRIE CONSERVATION ALLIANCE
P.O. Box 403 • BARABOO, WI 53913-0403 • www.saukprairievision.org

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AUG 27 2013
FACILITIES AND LANDS

August 26, 2013

Ms. Diane Brusoe and Mr. John Pohlman
Bureau of Lands and Facilities
Wisconsin Dept. of Natural Resources
101 S. Webster St.
P.O. Box 7921
Madison, WI 53707-7921

Dear Diane and John,

This letter and enclosures are submitted as the official response of The Sauk Prairie Conservation Alliance to the recent request for public comments by the Dept. of Natural Resources to the draft vision, goals and conceptual alternative land use scenarios for the Sauk Prairie Recreation Area/Badger Army Ammunition Plant. The Alliance speaks for its 300 plus active members, as well as over 1,300 individuals who have signed our on-line petition in support of the implementation of the Badger Reuse Plan and its emphasis on conservation, education and research, sustainable agriculture, and LOW-IMPACT recreational uses at Badger. We have reviewed the draft vision and goals, as well as all three of the department's conceptual alternatives, and offer these comments.

The draft vision and goals present a fairly concise rendering of the department's intentions, and generally follow the recommendations put forward in the draft Regional and Property Analysis for the SPRA released last summer. Over the last few weeks Alliance members participated in a discussion of these statements with the Badger Oversight Management Commission's Planning and Land Use Committee, and later with the full Commission. We concur with the Commission's recommendations for a more expansive and clearly stated vision and goals, which are included in the attached *Alternative 4: Conservation/Low-Impact Recreation Emphasis*, adopted by the Commission on August 15, 2013.

With regard to the individual conceptual alternatives, the first suggested alternative, "No Action" we recognize as a required formality, and although the idea of allowing the Badger property to lay idle for an indeterminate future has some advantages for the most well-established native communities of plants and animals, the first alternative offers no help in managing the spread of invasive species or for restoring the site to a healthy, sustainable condition. For this reason, we cannot support Alternative One. Alternative Two, the "Ecological Restoration" alternative, is well-suited for landscape restoration and wildlife management, but provides almost no recreational or other direct benefit to the human community, an option that does not recognize recreation as an important activity at Badger.

In contrast, the Badger Reuse Plan names low-impact recreation as one of the property's most important shared community values. We believe so strongly in this value that we support a fourth alternative (discussed later) that strongly specifies low-impact recreation, along with conservation and the other elements of a carefully integrated set of land uses. While Alternative Two reflects some of the conservation vision of the Reuse Plan, it fails to address the full potential of the site, and so we cannot fully support it. The third alternative, the "Outdoor Recreation" alternative, comes closer in many respects to what the Alliance has consistently advocated for, but in its attempts to combine all of the desirable conservation aspects of the first two alternatives with a wide range of recreational options, it goes too far, including high-impact, motorized vehicular use facilities and a high-powered rifle range. We believe these intrusive recreational activities will cause unwanted outcomes not only on the land and wildlife, but on the adjacent landowners and other users of the SPRA. Alternative Three also calls for isolating these potentially obnoxious uses in a "Special Use Zone," a proposal that lies in direct conflict with the first value of the Badger Reuse Plan, to manage Badger "as a whole." For these reasons we cannot support Alternative Three. However, removing the "Special Use Zone," the high-impact ATV track and the shooting range would go a long way in improving the third alternative. If that were the direction taken by the department, we believe it would be left with something like *Alternative 4: Conservation and Low-Impact Recreation Emphasis*, the scenario adopted by the Badger Oversight Management Commission.

We therefore submit *Alternative 4* (attached) as our preference.

The first of a list of bullet points included with *Alternative 4* calls for implementing the *Plan Elements* identified in the Badger Reuse Plan. As you know, the Badger Reuse Plan is comprised of a set of nine primary value statements and related criteria by which future land uses will be evaluated. In addition, the Reuse Plan identifies a set of specific "*Plan Elements*" or implementation steps that relate to each of the nine values. We have reviewed the many pages of these specific plan elements, and attach a selection for your review. We first submitted this list in July of 2012 along with our comments on the DNR's draft Regional and Property Analysis for the SPRA. The *Plan Elements* offer some highly specific operational recommendations, some of which suggest physical development of the site (e.g., the Visitor Center, hiking trails, etc.), and others focusing on programmatic aspects, such as educational efforts and public outreach programs. If the Master Plan proposed nothing more than to implement the *Plan Elements* laid out in the Badger Reuse Plan, it would give the Department and community plenty to work on for the coming years.

One of the first recommendations identified in the *Plan Elements* section was the creation of the Oversight Management Board, representative of the landowners and various community interests. Once again, we emphasize the critical role of the Badger Oversight Management Commission, created in 2005 with DNR assistance as an Intergovernmental Commission, in realizing the kind of collaborative effort required to achieve the integrated land use and management vision of the Reuse Plan. Our proposals emphasize the continued role of the OMC in organizing and facilitating much of the programming, but its success will depend upon the institutional and financial support of the owners and community. With support the OMC could be a powerful force in generating the regional and even national interest in Badger/Sauk Prairie Recreation Area that could lead to funding and program support for the larger mission. A crucial role that the Reuse Plan assigned to the Oversight Management Commission is to evaluate land use proposals. This step will assure that final proposals are consistent with the

the more profound historical, cultural and ecological aspects of the site. A title is needed that places the recreational value in its appropriate, subordinate context.

Thank you for the opportunity to participate in the master planning process. We remain encouraged by the enduring commitment of the Wisconsin Dept. of Natural Resources to upholding the Values and Criteria of the Badger Reuse Plan in the development and management of this unique property.

Sincerely,

A handwritten signature in black ink, appearing to read "Dave Tremble", with a long horizontal flourish extending to the right.

Dave Tremble, President
The Sauk Prairie Conservation Alliance

Enclosed:

BOMC Vision, Goals, Conceptual Alternative 4
SPCA review of Reuse Committee Report Plan Elements for future land use planning
SPCA petition for conservation/low impact recreation and comments. 1,336 signers and comments

cc: Rep. Fred Clark
Senator Jon Erpenbach
Elyse DeForest, NPS
Rep. Mark Pocan
Senator Ron Johnson
Senator Tammy Baldwin

Conservation/Low Impact Recreation Emphasis

Recommendation on Sauk Prairie Recreation Area Draft Conceptual Land Use Alternatives

ALTERNATIVE

4



Badger Oversight Management Commission

Preliminary Vision Statement:

The Sauk Prairie Recreation area contributes important areas of grasslands needed to reconstruct and experience a natural mosaic of prairie-savanna-woodlands-wetlands at a landscape scale. Directly adjacent to Devil's Lake State Park, it serves as a critical and unique ecological transition from the Baraboo Hills to the Wisconsin River, and creates a corridor that enhances and complements conservation and appropriate low-impact recreational opportunities. The site's significant history is incorporated into the management and interpretation of the natural, agricultural, historical and cultural resources.

Preliminary Goal Statements:

Ecological Management

Provide extensive areas of grassland and oak savanna to support the significant grassland and shrubland bird and other wildlife populations. Restore and enhance the ecological transition zone between the Baraboo Hills and the Wisconsin River to promote quality habitat for desirable game and non-game species, including rare and special concern species.

Recreation

Provide for low-impact public recreation that compliments and serves local, regional and state needs while providing opportunities to experience significant cultural and natural points of interest as well as aesthetic vistas.

Cultural Resources Preservation

Identify and preserve significant sites that contribute to the understanding and appreciation of the property's geological, Native American and Euro-American history and the creation, operation and decommissioning of the Badger Army Ammunition Plant.

Education & Interpretation

Provide interpretive and educational opportunities focusing upon natural history, restoration efforts, and the impacts of human uses. Integrate education and research related to land conservation, restoration and agricultural activities.

Badger Reuse Plan

Implement "the common vision for the reuses of the property" as expressed in the Badger Reuse Plan.

BADGER OVERSIGHT MANAGEMENT COMMISSION

Recommendation on Sauk Prairie Recreation Area Draft Conceptual Land Use Alternatives

ALTERNATIVE 4

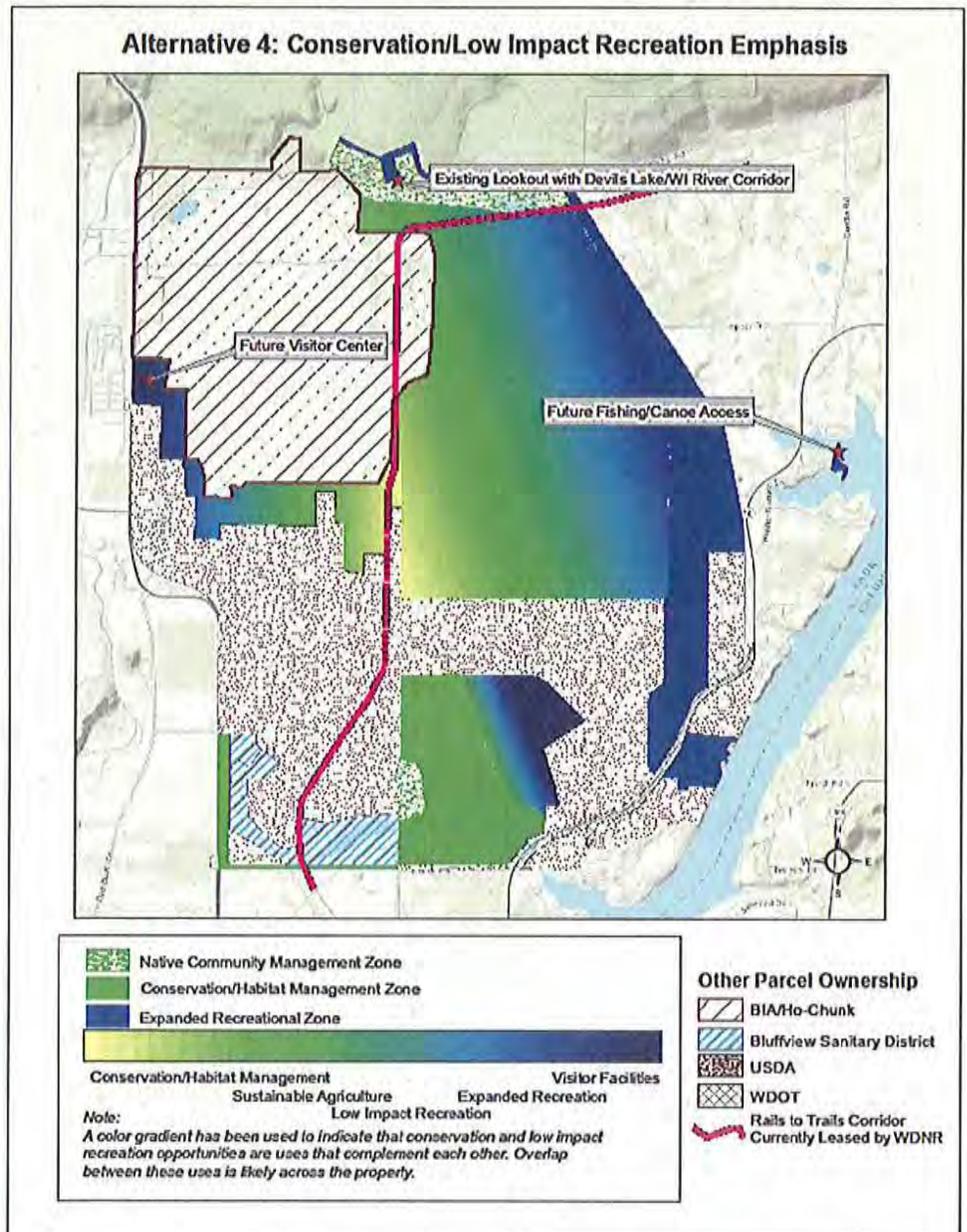
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HOW YOU CAN HELP:

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PLAN ELEMENTS

***Alternative 4: Conservation and Low-Impact Recreation Emphasis* calls for implementing the Plan Elements from the Badger Reuse Plan. The following enumerated items are gleaned directly from the Plan Elements section of the Badger Reuse Plan.**

1.1.1 Execute a negotiated, written operational agreement that supports the Reuse Plan values and criteria. (Alliance note: This element has been considered complete with the drafting of the Memorandum of Understanding between the state, local, tribal and federal agencies that stipulated the ownership and division of lands at Badger and authorized the creation of the Badger Oversight Management Commission)

1.3.3 The Oversight Management Board (Commission) should secure the funding to implement the Reuse Plan.

1.4.1 Establish a connection for people and wildlife between Devil's Lake State Park and Lake Wisconsin.

2.1.1 The U.S. Army should retain liability for undiscovered contamination.

2.4.1 Consider the cumulative impact of current and future uses and activities.

3.0.1 Reduce the negative impacts of existing roads and parking lot areas.

3.1.2 Rails-to-Trails options shall be explored to conserve existing rail beds.

3.1.3 Retain limited road access to portions of the BAAP property for restoration-education, agricultural and other activities. Over time many of these roads can be removed.

3.1.4 Identify new ecological restoration techniques as roads and infrastructure elements are removed.

3.2.1 Involve federal, tribal, state and local historic preservation organizations and qualified individuals in historical interpretation and educational programming.

4.1.1 Establish a central museum / visitor center and multi-use educational facility at the west entrance. (incorporate the input of native Americans and local community members).

4.1.2 Highlight facets of the Badger/Sauk Prairie history.

4.2.1 Recognize important historical features, native American sites, farmland remnants, historical roads, settlement sites, etc.

4.2.2 Recognize important natural history features including the diverse geological and ecological attributes.

4.3.1 Recognition should be given to soldiers, uniformed service personnel, workers, protesters, Badger Village residents, members of the Ho Chunk Nation, and displaced farmers. The memorial(s) should recognize, explain, and honor these contributions without glorifying the war experience.

4.3.2 Develop comprehensive educational program that commemorates the past, helps avoid future conflicts and builds community.

5.0.1 Develop active volunteer program to promote reconciliation and support community participation.

5.0.2 The Oversight Management Board (Commission) should explore opportunities for partnerships with state, regional and national organizations with expertise in ecological restoration.

5.1.1 The OMC should develop a comprehensive educational program that includes cross-cultural educational opportunities.

5.1.2 The OMC should consult with experienced educators to examine, plan and coordinate educational opportunities at Badger

5.1.3 The OMC should coordinate on site educational opportunities through local schools, colleges, universities, and UW Extension.

5.1.4 Establish demonstration areas to provide public educational opportunities related to ecological restoration, sustainable agriculture, historic preservation and environmental cleanup.

5.2.3 Pre-existing recreational uses, e.g. hunting, fishing, handicapped hunting, and bicycle racing will be reviewed and efforts made to accommodate these activities.

5.3.1 (No consensus was reached by the Badger Reuse Committee on the following plan elements. They were included in the plan for the OMC to consider and evaluate for compatibility with the Reuse Plan): Potentially compatible uses include bicycling, hiking, wildlife viewing, tent camping, cross-country skiing, horseback riding, permit-based managed hunting, and snowmobiling and all-terrain vehicle use *along the existing perimeter fence trail*.

5.3.2 The OMC should examine recreational opportunities afforded by the BAAP property's Lake Wisconsin shoreline.

6.2.1 A recreational corridor should be established from the southern border of the Badger property, possibly along the railroad right-of-way, to provide hiking and bike access between the Badger property and the lower Wisconsin River.

6.3.3 Provide mechanisms for scientific input into overall land management planning and decision-making, including monitoring and evaluation of management practices.

7.2.1 Ecological restoration activities should recognize and build upon prairie and savanna projects already initiated by the DoD.

7.2.2 Ecological restoration activities should strive to restore the BAAP property's unique gradient of natural communities from prairie to savanna to woodland to forest.

7.2.3 Include the broadest range of native floral and faunal species.

7.2.4 Undertake further geological and biological surveys.

7.4.1 Cultivation of land for agricultural purposes is not deemed an adverse visual impact. (Here's an idea: reconstruct an original settlement farm on its original location)

7.4.2 Industrial and commercial activities are not compatible uses.

7.4.3 Rents from leases should be used to further restoration and educational uses.

Pohlman, John D - DNR

From: Ross, Laurie J - DNR
Sent: Friday, August 30, 2013 7:44 AM
To: Bill Wenzel [REDACTED]
Cc: Pohlman, John D - DNR; Brusoe, Diane M - DNR; Aquino, Mark D - DNR;
[REDACTED]
Subject: BOMC Comments for the DNR Master Planning Process - SPRA
Attachments: alternative4landusemap7_25_13.pdf; Revised Alt4 by BOMC 7_25_13.pdf; BOMC Vision and Goals Alt July 2013.docx

Your email with attachments has been forwarded to all members of the Natural Resources Board. On behalf of the Board, I would like to thank you for sharing BOMC's recommendations as well as their vision and goals regarding the Sauk Prairie Recreation Area.

Best regards,

Laurie J. Ross
Natural Resources Board Liaison, AD/8
Wisconsin Department of Natural Resources P. O. Box 7921, Madison, WI 53707-7921
phone: (608) 267-7420
fax: (608) 266-6983
e-mail: laurie.ross@wisconsin.gov
website: <http://dnr.wi.gov/about/nrb/>
Find us on Facebook: www.facebook.com/WIDNR

We are committed to service excellence.
Visit our survey at <http://dnr.wi.gov/u/?q=85> to evaluate how I did.

-----Original Message-----

From: William F. Wenzel [REDACTED]
Sent: Thursday, August 29, 2013 10:30 AM
To: Pohlman, John D - DNR; Brusoe, Diane M - DNR
Cc: Ross, Laurie J - DNR; Aquino, Mark D - DNR; Brian Simmert
Subject: BOMC Comments for the DNR Master Planning Process

John & Diane,

Re: Alternative 4 for DNR master plan for Badger

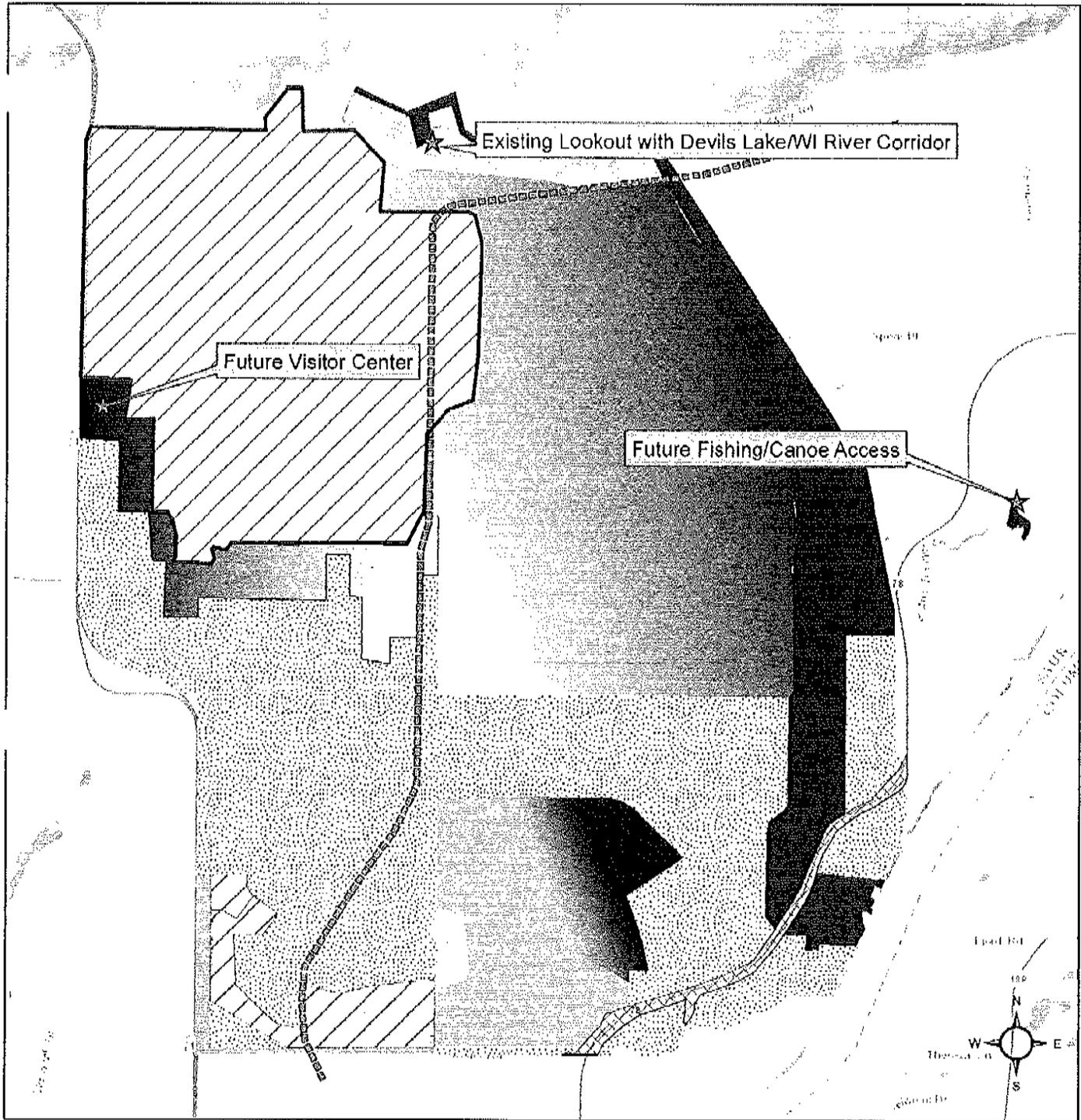
At the Badger Oversight & Management Commission meeting on August 15th, the Commission voted to pass by consensus Alternative 4 with our recommendation on Preliminary Vision and Goal Statement attached. DNR abstained since they are the one gathering comments.

Accordingly we are forwarding our action to the Department as our formal input to the DNR Master Planning process.

Thank you for your consideration.

William F. Wenzel
Chair, Badger Oversight & Management Commission

Alternative 4: Conservation/Low Impact Recreation Emphasis



Native Community Management Zone
 Conservation/Habitat Management Zone
 Expanded Recreational Zone

Conservation/Habitat Management Visitor Facilities
 Sustainable Agriculture Expanded Recreation
 Low Impact Recreation

Note:
 A color gradient has been used to indicate that conservation and low impact recreation opportunities are uses that complement each other. Overlap between these uses is likely across the property.

Other Parcel Ownership

-  BIA/Ho-Chunk
-  Bluffview Sanitary District
-  USDA
-  WDOT
-  Rails to Trails Corridor
Currently Leased by WDN

Badger Oversight Management Commission Recommendation on Sauk Prairie Recreation Area Draft Conceptual Land Use Alternatives

The 2001 Badger Reuse Plan was an agreement entered into by 21 representatives of local, state, federal and tribal units of government as well as neighboring landowners, businesses, school districts and nonprofits. The plan emphasizes conservation and low-impact recreational activities and it is still in effect. The National Park Service agreement with DNR also emphasizes conservation and low-impact recreational activities. Alternative 4 below continues this emphasis on conservation and low-impact recreation uses.

Alternative 4: Conservation/Low Impact Recreation Emphasis

Under this management alternative, emphasis is placed on land uses and management objectives that complement each other and those of the surrounding land owners, enhancing the health, culture, and economy of the Badger lands and the surrounding community. This alternative views current planning and implementation efforts as the most recent expression of a long history of human activity on the Sauk Prairie, and as an opportunity to honor the sacrifices and contributions of our ancestors. It acknowledges the legacy of conflict that has marked previous chapters of human experience on the Sauk Prairie, and advances the process of reconciling these conflicts.

Healing the land is an essential step in that process, and at Badger, healing the land is a "re-creational" activity of the first order. Ecological restoration projects, aided by collaborative agricultural, educational, and scientific research programs, will support enhanced understanding and appreciation of Badger's wildlife and its natural and cultural history, and demonstrate new ways to secure healthy, thriving human and natural communities. The history of all the people who have made the Sauk Prairie home over thousands of years will be shared. That history will include the story of the Badger Army Ammunition Plant and will continue through the current efforts to develop and implement the consensus vision for the future of this long contested site.

Opportunities for outdoor recreation will include traditional activities (such as hunting and fishing) that have long been among the varied uses of the Badger property, and that contribute importantly to greater awareness of Badger's full conservation value. Of particular value are the property's important populations of grassland birds. The presence of these birds and other wildlife will attract thousands of visitors, as wildlife viewing continues to expand in popularity in the coming decades. Because the benefits of peace and quiet are among the most rapidly diminishing natural resource values in our contemporary environment, and consequently are among the frequently most sought after, a wide variety of low-impact recreational activities will be accommodated. The opportunity to explore the Badger property, especially given the promise of a regional recreational trail linking the Sauk Prairie Recreation Area to nearby major regional trails, will draw thousands more to the area. Their experience of the area will be enhanced by interpretive trail signage and guided tours.

Eventually, the creation of a Visitor Center will serve as a focal point for orienting visitors and as a destination for students of all ages interested in exploring Sauk Prairie's unique geological, ecological, and human history. Visitors will be encouraged to participate in on-site restoration and citizen science projects.

Because agriculture is such a fundamental component of the Wisconsin economy and landscape, and will remain an essential tool for economic development and land stewardship in the future, creative opportunities will be provided for local family farm operators to participate in collaborative conservation agriculture research projects. Badger's landscape includes not only the SPRA but lands now held by the USDA Dairy Forage Research Center and potentially the Ho-Chunk Nation, offering a unique and remarkable opportunity to study new ways to combine agricultural production with the conservation and restoration of soils, water, wildlife, forests, grasslands and wetlands. Research and demonstration of innovative conservation agriculture practices such as managed, rotational livestock grazing to help control invasive plants and woody vegetation will benefit the land, our farming neighbors, Badger's recreational users, and the people of Wisconsin. Private landowners, volunteers, students, and community organizations will come to Badger and play an active role in these land restoration and stewardship activities. As Badger's landowners work together with visitors,

neighbors, and partners, a changing landscape of row crop, pasture, restored prairies and savannas, and woodlands will provide a valuable model, showing how Wisconsin's land can support an agricultural economy that enhances farm families, local economies and farm communities, and healthy populations of native birds and other wildlife, in a public setting that can be enjoyed and appreciated by generations to come.

The following specific activities and uses are consistent with conservation and low-impact recreation:

- Implement plan elements specified in the Badger Reuse Plan;
- Restore large, unfragmented tracts of grassland, wetland and shrubland (Habitat Management Zone)* to support native and migratory birds and wildlife;
- Restore remnants of native natural communities and the species they support (Native Community Management Zone)*; limit access to pedestrian use;
- Provide low-impact porous non-paved recreation trails that complement the topography and resource management;
- Preserve and enhance key vistas through vegetation management;
- Selectively site and construct (through community partnerships) a new visitor center with interpretation and educational opportunities;
- Provide interpretation and education opportunities about this property's history and geographic location, acknowledge Ho-Chunk Nation history and Euro-American histories and displacements, and the design, operation and decommissioning of the Badger Army Ammunitions Plant;
- Provide facilities such as a classroom, parking area, staging area, wash station and bathrooms near the Visitor's Center in the Habitat Restoration Zone;
- Identify and improve primary auto access roads through the property and deconstruct roads no longer needed. Limit vehicle access;
- Provide interpretation and education opportunities for schools and universities;
- Use volunteers to promote community participation in education and to help restore natural communities;
- Provide outdoor research opportunities for ecologists, scientists and students;
- Develop parking, picnic areas and viewing areas in the Expanded Recreational Zone* and to a lesser degree in the Habitat Restoration Zone*;
- Develop a fishing pier, canoe/carry-in boat access, and picnic area at the Lake Wisconsin parcel;
- Provide a multiple use trail connecting the Sauk Prairie area, Merrimac area, and Devil's Lake State Park via Burma road consisting of hiking and biking and a seasonal snowmobile trail on an agreed upon route;
- Designate parcel "M" and "M1" as a Habitat Restoration Zone*;
- Remove any unwanted infrastructure, buildings or debris that remains on the property, with the exception of infrastructure that may provide bat habitat and support bat research.

Note (*): The use of the term "Zone(s)" above is to maintain compatibility with language in other DNR proposed alternatives; BOMC members feel this term in most cases is too restrictive and exclusive for Badger lands which often have characteristics of one or more zone types in one area. Exclusive use zones may conflict with the first Value of the Badger Reuse Plan: to manage Badger as a whole.

ATTACHMENT to Alternative 4
Badger Oversight Management Commission Planning and Land Use Committee
Recommendation on Preliminary Vision and Goal Statements

Preliminary Vision Statement:

The Sauk Prairie Recreation area contributes important areas of grasslands needed to reconstruct and experience a natural mosaic of prairie-savanna-woodlands-wetlands at a landscape scale. Directly adjacent to Devils Lake State Park, it serves as a critical and unique ecological transition from the Baraboo Hills to the Wisconsin River, and creates a corridor that enhances and compliments conservation and appropriate low-impact recreational opportunities. The site's significant history is incorporated into the management and interpretation of the natural, agricultural, historical and cultural resources.

Preliminary Goal Statements:

Ecological Management

Provide extensive areas of grassland and oak savanna to support the significant grassland and shrubland bird and other wildlife populations. Restore and enhance the ecological transition zone between the Baraboo Hills and the Wisconsin River to promote quality habitat for desirable game and non-game species, including rare and special concern species.

Recreation

Provide for low-impact public recreation that compliments and serves local, regional and state needs while providing opportunities to experience significant cultural and natural points of interest as well as aesthetic vistas.

Cultural Resources Preservation

Identify and preserve significant sites that contribute to the understanding and appreciation of the property's geological, Native American and Euro-American history and the creation, operation and decommissioning of the Badger Army Ammunition Plant.

Education and Interpretation

Provide interpretive and educational opportunities focusing upon natural history, restoration efforts, and the impacts of human uses. Integrate education and research related to land conservation, restoration and agricultural activities.

Badger Reuse Plan

Implement "the common vision for the reuses of the property" as expressed in the Badger Reuse Plan.



The Nature Conservancy in Wisconsin
633 West Main Street
Madison, Wisconsin 53703

tel 608/251-8140
fax 608/251-8535
nature.org/wisconsin

August 28, 2013

Ms. Diane Brusoe
Wisconsin Department of Natural Resources
101 S. Webster Street
P.O. Box 7921
Madison, WI 53707-7921

Re: The Nature Conservancy's comments regarding the Draft Conceptual Alternatives for the Sauk Prairie Recreation Area (SPRA)

Dear Ms. Brusoe,

The Nature Conservancy, on behalf of its 20,000 members in Wisconsin, appreciates the opportunity to provide our comments on the Draft Conceptual Alternatives for the Sauk Prairie Recreation Area. The opportunity to thoughtfully plan and restore an area as significant in size and ecological value as the former Badger Army Ammunition Plant is an extremely rare occasion—particularly in the context of a highly fragmented landscape such as that found in southern Wisconsin.

The Sauk Prairie Recreation Area can provide an important wildlife corridor between the Lower Wisconsin Riverway and the Baraboo Hills. Both areas contain significant areas of biological diversity and have been the focus of conservation activities for decades. The Southern Range of the Baraboo Hills, which was designated as a National Natural Landmark by the National Park Service in 1974, was recognized by The Nature Conservancy as one of the 70 Last Great Places in the Western Hemisphere. It encompasses more than 53,000 acres of private and public land and harbors more than 1,800 plants and animals. Improving the natural connection of the Lower Wisconsin Riverway with the Baraboo Hills will enhance the conservation value of both areas.

In its own right, the Sauk Prairie Recreation Area (SPRA) has high ecological significance and offers a unique opportunity for landscape-scale management for the benefit of a wide range of species and habitats. A substantial portion of the SPRA has the potential to be restored and managed as a complex of dry prairie, grassland, oak savanna, and oak woodland habitats. These ecological communities provide important habitat to an array of rare and declining species, particularly grassland and shrubland birds, a group of species of critical conservation need in Wisconsin. Each contiguous acre of grassland at a large site like the SPRA is an extremely valuable resource to protect and maintain as habitat for these declining species.

In 1993, The Nature Conservancy conducted a biological inventory of the Badger property, and a number of rare and threatened plant species were located and recorded, with the Army subsequently implementing a management program with attention to these species. With this in mind, we encourage the Wisconsin Department of Natural Resources (WDNR) to carefully consider what recreational uses are compatible with resource managers' ability to manage the area as a whole, with long-term consideration for ecological integrity at the forefront.

While the ecological importance of this site cannot be overstated, it is important to note the significant opportunity this site presents for increasing recreational opportunities in southern Wisconsin. Visitor use at Devil's Lake State Park is nearly two million people per year, making it the most visited state park in the Midwest. If Devil's Lake were a national park it would rank 12th in the nation in attendance, following close behind Glacier National Park in Montana. There is a clear and growing demand for low-impact recreational uses in this area of the state. The SPRA has the ability to provide increased recreational opportunities for hikers, bird-watchers, hunters, anglers, cross-country skiers and naturalists who are already heavily using Sauk County conservation land. If appropriately managed, these activities can have a positive impact on the ecological and economic health of the area.

With the goal of ecological restoration and maximizing low impact recreational uses, we oppose the introduction of high impact uses to this area, including ATV trails and a shooting range. These activities do not live up to the agreement the WDNR signed with the U.S. Department of Interior. In the Federal Lands to Parks documents signed by the WDNR in 2004, the stated goal was to acquire the property for low impact recreation. ATV use and creation of a shooting range could not be defined as low impact recreation and would be detrimental to the restoration of the site as well as overall recreational usership.

While ATV use is compatible with some larger conservation projects, such as working forest easements in the northern part of the state, SPRA does not lend itself well to this activity. Motorized use on conservation sites has largely been limited to areas with established and maintained forestry roads. If large-scale ecological restoration is a goal for this site, motorized recreational vehicles have the potential to cause detrimental impacts in the form of soil compaction, off-trail trampling and the spread of invasive species. A shooting range may not have as big of a direct impact on the ecology of the site as ATV use, but would have a high impact on other recreational users and again could not be considered a low impact use. Neither of these uses are compatible with the vision laid out in the 2004 agreement and should not be a part of the long term vision for the site.

The opportunity to create a blueprint for the future of a site this significant is an opportunity the citizens of Wisconsin are not likely to have again. For the reasons listed above, we encourage the WDNR to pursue a hybrid of the alternatives listed. We support the plan put forward by the Badger Oversight Management Commission titled Alternative 4. This is the best plan to maximize the ecological, recreational and economic opportunities of the SPRA.

Again, we appreciate the opportunity to comment on the Draft Conceptual Alternatives for the Sauk Prairie Recreation Area, and we look forward to continuing to work with the WDNR in protecting and celebrating the wealth of conservation opportunities at this unique site.

Sincerely,



Mary Jean Huston
State Director
The Nature Conservancy -- Wisconsin Chapter



**WISCONSIN
AUDUBON COUNCIL**

29 August 2013

Diane Brusoe (Diane.Brusoe@wisconsin.gov)
Wisconsin DNR Planner - LF/6
PO Box 7921
Madison, WI 53707-7921

Re: Sauk Prairie Recreation Area (Badger Army Ammunition Plant) - Master Plan

Dear Ms. Brusoe:

The Wisconsin Audubon Council has participated in the planning process for determining the future of the Badger Army Ammunition Plant ("Badger Army") since it was decommissioned in 1997. We commend you for taking on the monumental task of planning for this extraordinary property, involving the public at every step. The State of Wisconsin has an unprecedented opportunity here to conserve, restore, and manage for grassland and shrubland birds and other wildlife in one of the largest, unfragmented landscapes in southern Wisconsin.

We applaud the DNR for recognizing the importance of managing and interpreting the natural, agricultural, historical, and cultural resources of the vast Badger Army property on a landscape scale. It's especially notable that DNR hopes to provide "extensive areas of grassland and oak savanna habitats to support the significant grassland and shrubland bird populations" and plans to restore and enhance "the ecological transition zone between the Baraboo Hills and the Wisconsin River to promote quality habitat for desirable game and nongame species, including rare and special concern species."

It's important to point out, however, that there's a very important opportunity here to put an end to the extensive damage that was instigated on this land over many decades of human use. The DNR says it will provide "interpretive and educational opportunities focusing upon natural history, restoration efforts, *and the impacts of human uses*" [emphasis added]. Instead of allowing active recreation use and a shooting range on the property, however, which would extend the impacts of human use into the future, the DNR should delete both from further consideration.

In addition, as we've strongly urged in previous comments, non-toxic ammunition and fishing tackle be required for any hunting and fishing on the entire property. A heavy burden of lead shot is being deposited on DNR-managed lands throughout the state, and the result is continued contamination of these sites and the predictable negative consequences for our waterfowl, game birds, and other wildlife. Just two or three pellets can kill some bird species. Lead can also cause behavioral changes, making wildlife more susceptible to disease, predation, and accidents.

We would continue to emphasize that management of grassland and shrubland habitat and grassland and shrubland birds *must* be the *primary focus* at Badger. We understand that population growth in southern

Wisconsin presents a need for this land to be used for outdoor recreation and that with 7,354 acres available, it would appear that using a portion for active recreation is reasonable. However, by trying to satisfy all needs, DNR will be at risk of satisfying no one. Why add one more shooting range when there are 40 available within an hour's drive of Badger? By focusing on nonmotorized and low-impact recreation, Wisconsin would go far in promoting the quiet enjoyment and appreciation of our native landscapes by the public – *and* it would be compatible with grassland bird conservation. This would benefit both birds and people while fostering support for conservation of natural systems on both public and private lands here and elsewhere.

Ground-nesting grassland birds are especially vulnerable to disruptions, especially from users leaving designated trails, a temptation in a landscape as open as Badger. Low-impact ecotourism, *especially birding*, is a growing recreational activity that will provide economic benefits to the “heart of Wisconsin conservation”. And, keeping state budgets in mind, managing the property primarily for birds and other wildlife would be very low cost, especially when compared to development for more active recreation.

In early August, the Wisconsin Audubon Council voted to support Alternative 4, proposed by the Badger Oversight Management Commission (for the entire text and map, see <http://www.saukprairievision.org/uploadedfiles/File/Alt%204%20Cons%20and%20Low%20Impact%20Recreation%285%29.pdf>). Here is the list of their "**Specific Activities and Uses consistent with Conservation and Low Impact Recreation**":

- Implement plan elements specified in the Badger Reuse Plan;
- Restore large, unfragmented tracts of grassland, wetland and shrubland (Habitat Management Zone)* to support native and migratory birds and wildlife;
- Restore remnants of native natural communities and the species they support (Native Community Management Zone)*; limit access to pedestrian use;
- Provide low-impact porous non-paved recreation trails that complement the topography and resource management;
- Preserve and enhance key vistas through vegetation management;
- Selectively site and construct (through community partnerships) a new visitor center with interpretation and educational opportunities;
- Provide interpretation and education opportunities about this property's history and geographic location, acknowledge Ho-Chunk Nation history and Euro-American histories and displacements, and the design, operation and decommissioning of the Badger Army Ammunitions Plant;
- Provide facilities such as a classroom, parking area, staging area, wash station and bathrooms near the Visitor's Center in the Habitat Restoration Zone;
- Identify and improve primary auto access roads through the property and deconstruct roads no longer needed. Limit vehicle access;
- Provide interpretation and education opportunities for schools and universities;
- Use volunteers to promote community participation in education and to help restore natural communities;
- Provide outdoor research opportunities for ecologists, scientists and students;
- Develop parking, picnic areas and viewing areas in the Expanded Recreational Zone* and to a lesser degree in the Habitat Restoration Zone*;
- Develop a fishing pier, canoe/carry-in boat access, and picnic area at the Lake Wisconsin parcel;

- Provide a multiple use trail connecting the Sauk Prairie area, Merrimac area, and Devil's Lake State Park via Burma road consisting of hiking and biking and a seasonal snowmobile trail on an agreed upon route;
- Designate parcel "M" and "M1" as a Habitat Restoration Zone*;
- Remove any unwanted infrastructure, buildings or debris that remains on the property, with the exception of infrastructure that may provide bat habitat and support bat research.

Note (*): The use of the term "Zone(s)" above is to maintain compatibility with language in other DNR proposed alternatives; BOMC members feel this term in most cases is too restrictive and exclusive for Badger lands which often have characteristics of one or more zone types in one area. Exclusive use zones may conflict with the first Value of the Badger Reuse Plan: to manage Badger as a whole.

The Council would also like to emphasize that there is a need to do everything possible to minimize noise on the property, as well as light pollution. We would also urge the DNR to consider the retention of the neotenic tiger salamander populations past the May 2014 deadline in order to provide an additional year to move the salamanders out if necessary.

With 7,354 acres available, Badger Army is one of the very best opportunities anywhere in the state to restore grassland birds, which are declining faster than any other group of birds in Wisconsin. Recent studies of nesting grassland birds at Sauk Prairie Recreation Area and Badger Army have led to its being named a state Important Bird Area, a program that is international in scope and for which sites must meet strict objective, standardized, and science-based criteria. Bird species that have been found here include Eastern and Western meadowlarks, Bobolink, Upland Sandpiper, Orchard Oriole, Bell's Vireo, Dickcissel, and Clay-colored, Vesper, Savannah, Field, Grasshopper sparrows, and more. Many of these species are sensitive to habitat fragmentation and need very large blocks of habitat to successfully breed. In addition, climate change may shift the range of many southern shrubland birds into Wisconsin, one more reason we recommend that management of Badger for grassland and shrubland bird habitat be a very high priority.

It cannot be emphasized enough that Badger Army is an unprecedented opportunity in a world that is "too much with us" in the numbers of people and the noise we create. Let's honor the past by addressing the harm that's been done and by restoring the land for the future of our birds and wildlife - and us. Let's envision the future as depicted by the Victor Bakhtin painting of the expansive prairie with its diverse wildlife. Future generations will thank us for having the vision to take those actions that will "complement each other and those of the surrounding land owners, enhancing the health, culture, and economy of the Badger lands and the surrounding community."

Thank you for the opportunity to comment.

Sincerely,



Karen Litter Hale
 2nd Vice President
 Wisconsin Audubon Council
 222 S. Hamilton St., Suite 1
 Madison, WI 53703



Madison Audubon Society, Inc.

Serving Columbia, Dane, Dodge, Iowa, Jefferson, Marquette, Richland, and Sauk Counties

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29 August 2013

Diane Brusoe (Diane.Brusoe@wisconsin.gov)

Wisconsin DNR Planner - LF/6

PO Box 7921

Madison, WI 53707-7921

Re: Sauk Prairic Recreation Area (Badger Army Ammunition Plant) - Master Plan

Dear Ms. Brusoe:

Madison Audubon Society has participated in the planning process for determining the future of the Badger Army Ammunition Plant ("Badger Army") since it was decommissioned in 1997. We commend you for taking on the monumental task of planning for this extraordinary property, involving the public at every step. The State of Wisconsin has an unprecedented opportunity here to conserve, restore, and manage for grassland and shrubland birds and other wildlife in one of the largest, unfragmented landscapes in southern Wisconsin.

We applaud the DNR for recognizing the importance of managing and interpreting the natural, agricultural, historical, and cultural resources of the vast Badger Army property on a landscape scale. It's especially notable that DNR hopes to provide "extensive areas of grassland and oak savanna habitats to support the significant grassland and shrubland bird populations" and plans to restore and enhance "the ecological transition zone between the Baraboo Hills and the Wisconsin River to promote quality habitat for desirable game and nongame species, including rare and special concern species."

It's important to point out, however, that there's a very important opportunity here to put an end to the extensive damage that was instigated on this land over many decades of human use. The DNR says it will provide "interpretive and educational opportunities focusing upon natural history, restoration efforts, *and the impacts of human uses*" [emphasis added]. Instead of allowing active recreation use and a shooting range on the property, however, which would extend the impacts of human use into the future, the DNR should delete both from further consideration.

In addition, as we've strongly urged in previous comments, non-toxic ammunition and fishing tackle be required for any hunting and fishing on the entire property. A heavy burden of lead shot is being deposited on DNR-managed lands throughout the state, and the result is continued contamination of these sites and the predictable negative consequences for our waterfowl, game birds, and other wildlife. Just two or three pellets can kill some bird species. Lead can also cause behavioral changes, making wildlife more susceptible to disease, predation, and accidents.

We would continue to emphasize that management of grassland and shrubland habitat and grassland and shrubland birds *must* be the *primary focus* at Badger. We understand that

population growth in southern Wisconsin presents a need for this land to be used for outdoor recreation and that with 7,354 acres available, it would appear that using a portion for active recreation is reasonable. However, by trying to satisfy all needs, DNR will be at risk of satisfying no one. Why add one more shooting range when there are 40 available within an hour's drive of Badger? By focusing on nonmotorized and low-impact recreation, Wisconsin would go far in promoting the quiet enjoyment and appreciation of our native landscapes by the public – *and* it would be compatible with grassland bird conservation. This would benefit both birds and people while fostering support for conservation of natural systems on both public and private lands here and elsewhere.

Ground-nesting grassland birds are especially vulnerable to disruptions, especially from users leaving designated trails, a temptation in a landscape as open as Badger. Low-impact ecotourism, *especially birding*, is a growing recreational activity that will provide economic benefits to the “heart of Wisconsin conservation”. And, keeping state budgets in mind, managing the property primarily for birds and other wildlife would be very low cost, especially when compared to development for more active recreation.

In early August, the Madison Audubon Society board voted unanimously to support Alternative 4, proposed by the Badger Oversight Management Commission (for the entire text and map, see <http://www.saukprairievision.org/uploadedfiles/File/Alt%204%20Cons%20and%20Low%20Impact%20Recreation%285%29.pdf>). Here is the list of their "**Specific Activities and Uses consistent with Conservation and Low Impact Recreation**":

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- Preserve and enhance key vistas through vegetation management;
- Selectively site and construct (through community partnerships) a new visitor center with interpretation and educational opportunities;
- Provide interpretation and education opportunities about this property's history and geographic location, acknowledge Ho-Chunk Nation history and Euro-American histories and displacements, and the design, operation and decommissioning of the Badger Army Ammunitions Plant;
- Provide facilities such as a classroom, parking area, staging area, wash station and bathrooms near the Visitor's Center in the Habitat Restoration Zone;
- Identify and improve primary auto access roads through the property and deconstruct roads no longer needed. Limit vehicle access;
- Provide interpretation and education opportunities for schools and universities;
- Use volunteers to promote community participation in education and to help restore natural communities;

- Provide outdoor research opportunities for ecologists, scientists and students;
- Develop parking, picnic areas and viewing areas in the Expanded Recreational Zone^a and to a lesser degree in the Habitat Restoration Zone^{*};
- Develop a fishing pier, canoe/carry-in boat access, and picnic area at the Lake Wisconsin parcel;
- Provide a multiple use trail connecting the Sauk Prairie area, Merrimac area, and Devil's Lake State Park via Burma road consisting of hiking and biking and a seasonal snowmobile trail on an agreed upon route;
- Designate parcel "M" and "M1" as a Habitat Restoration Zone^{*};
- Remove any unwanted infrastructure, buildings or debris that remains on the property, with the exception of infrastructure that may provide bat habitat and support bat research.

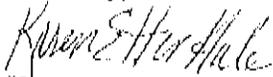
Note (*): The use of the term "Zone(s)" above is to maintain compatibility with language in other DNR proposed alternatives; DDMC members feel this term in most cases is too restrictive and exclusive for Badger lands which often have characteristics of one or more zone types in one area. Exclusive use zones may conflict with the first Value of the Badger Rouse Plan: to manage Badger as a whole.

With 7,354 acres available, Badger Army is one of the very best opportunities anywhere in the state to restore grassland birds, which are declining faster than any other group of birds in Wisconsin. Recent studies of nesting grassland birds at Sauk Prairie Recreation Area and Badger Army have led to its being named a state Important Bird Area, a program that is international in scope and for which sites must meet strict objective, standardized, and science-based criteria. Bird species that have been found here include Eastern and Western meadowlarks, Bobolink, Upland Sandpiper, Orchard Oriole, Bell's Vireo, Dickcissel, and Clay-colored, Vesper, Savannah, Field, Grasshopper sparrows, and more. Many of these species are sensitive to habitat fragmentation and need very large blocks of habitat to successfully breed. In addition, climate change may shift the range of many southern shrubland birds into Wisconsin, one more reason we recommend that management of Badger for grassland and shrubland bird habitat be a very high priority.

It cannot be emphasized enough that Badger Army is an unprecedented opportunity in a world that is "too much with us" in the numbers of people and the noise we create. Let's honor the past by addressing the harm that's been done and by restoring the land for the future of our birds and wildlife - and us. Let's envision the future as depicted by the Victor Bakhtin painting of the expansive prairie with its diverse wildlife. Future generations will thank us for having the vision to take those actions that will "complement each other and those of the surrounding land owners, enhancing the health, culture, and economy of the Badger lands and the surrounding community."

Thank you for the opportunity to comment.

Sincerely,



Karen Eiter Hale
Executive Secretary



WISCONSIN WILDLIFE FEDERATION

MACKENZIE ENVIRONMENTAL CENTER

W7303 COUNTY RD CS & Q, POYNETTE, WI 53955 • (608) 635-2742 • (800) 897-4161
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August 28, 2013

John Pohlman, Senior Planner
Department of Natural Resources
101 S. Webster Street
PO Box 7921
Madison, WI 53707-7921

Re: Comments from the Wisconsin Wildlife Federation Regarding the Sauk Prairie Recreation Area Preliminary Vision and Goals

Dear John:

On behalf of the Wisconsin Wildlife Federation thank you for the opportunity to comment on the Sauk Prairie Recreation Area Preliminary Vision and Goals. The Federation is the state's largest conservation organization representing 186 hunting, fishing, trapping and forestry-related organizations.

The Federation has been a long time strong supporter of the state acquisition and restoration of the former Badger Ordinance facility in Sauk County. Leaders currently in the Federation had a role in both in the development of the Badger Reuse Plan and as a member of the Badger Oversight Management Commission in advising the Department in the cleanup and restoration of the Badger Ordinance property.

The WWF is a strong supporter of the proposed Alternative 4 for the SPRA Preliminary Vision and Goals. This alternative (attached) is an excellent blend of Conservation and Low Impact Recreation that is fully consistent with the Badger Reuse plan that was carefully developed with broad public consensus of state, federal, local and tribal governments, local landowners, local businessmen and representatives of historic, cultural, educational, environmental, conservation and clean-up interests. The plan called for an emphasis on environmental cleanup, habitat restoration and protection and a wide array of recreational uses provided that they would have low impact on the land and water resources of Badger.

Alternative 4 is endorsed by many organizations and individuals including many that were involved in the initial development of the Badger Reuse Plan in

in 2001. Current local governments and local media have also endorsed Alternative 4.

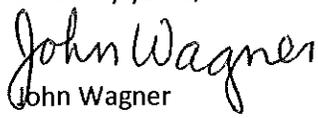
As noted above, the Federation largely represents sportsmen and women and as such strongly supports Alternative 4's adoption of hunting, fishing trapping and similar uses such as dog trialing and training as low impact recreational uses. Sportsmen and women have long endorsed keeping the area open for low-impact recreational use. We have attached a 1998 Sauk County Conservation Congress Spring Hearing resolution which was endorsed by 32 out of 33 counties in which it was circulated. The resolution specifically provided: "Now therefore be it resolved by the Sauk County Division of the Conservation Congress in annual meeting on April 13, 1998, that the WDNR should use all means available to acquire BAAP land for the purpose of managing restoration, preservation, and protection. Moreover the lands should be managed to allow public uses such as, but not limited to: hunting, fishing, hiking, biking and cross country skiing." The resolution was introduced by Roger Shanks, then Chair of the Sauk County Conservation Congress.

The Federation, although a strong supporter of the shooting sports and a strong ally of the Department in the creation and retention of more shooting ranges in the state (recent actions in Columbia County), does not sport the Department's proposed Alternative 3 Special Use Zone which permits both the development of a shooting range and ATV trails. The area in question is an excellent habitat area for both game and non-game bird species and should not be developed into a high impact recreational area. Every use has its place and ATV trails and a shooting range should be located elsewhere than the Sauk Prairie Recreational Area.

This issue has been discussed many times by the full Board of Directors of the Federation and at the August 11, 2013 meeting in Ashland, the Board of Directors voted unanimously to support Alternative 4 for the future management and use of the Sauk Prairie Recreation Area.

Thank you for your consideration of our position.

Sincerely yours,


John Wagner
President

ALTERNATIVE 4

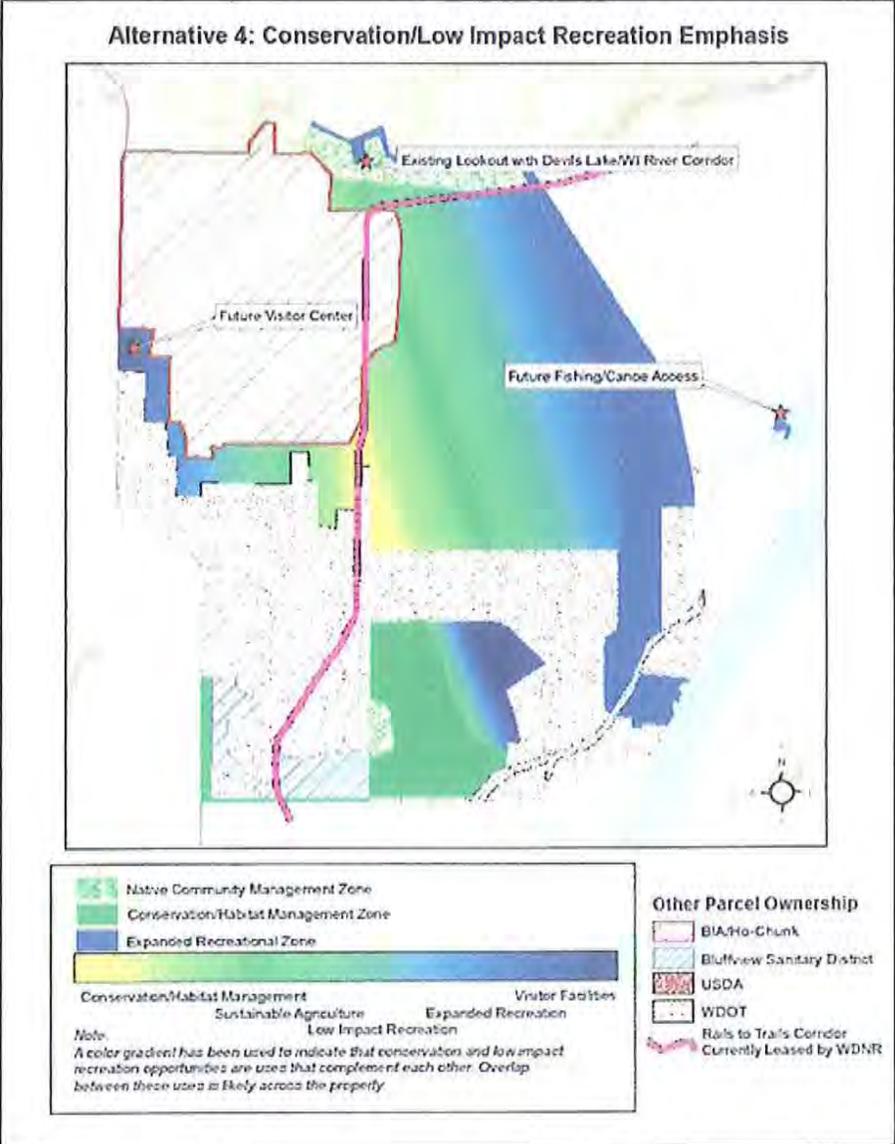
Conservation/Low Impact Recreation Emphasis

The 2001 Badger Reuse Plan was an agreement entered into by 21 representatives of local, state, federal and tribal units of government as well as neighboring landowners, businesses, school districts and nonprofits. The plan emphasizes conservation and low-impact recreational activities and it is still in effect. The National Park Service agreement with DNR (Wisconsin Department of Natural Resources) also emphasizes conservation and low-impact recreational activities. Alternative 4 below continues this emphasis on conservation and low-impact recreation uses.

Under this management alternative, emphasis is placed on land uses and management objectives that complement each other and those of the surrounding land owners, enhancing the health, culture, and economy of the Badger lands and the surrounding community. This alternative views current planning and implementation efforts as the most recent expression of a long history of human activity on the Sauk Prairie, and as an opportunity to honor the sacrifices and contributions of our ancestors. It acknowledges the legacy of conflict that has marked previous chapters of human experience on the Sauk Prairie, and advances the process of reconciling these conflicts.

Healing the land is an essential step in that process, and at Badger, healing the land is a "re-creational" activity of the first order. Ecological restoration projects, aided by collaborative agricultural, educational, and scientific research programs, will support enhanced understanding and appreciation of Badger's wildlife and its natural and cultural history, and demonstrate new ways to secure healthy, thriving human and natural communities. The history of all the people who have made the Sauk Prairie home over thousands of years will be shared. That history will include the story of the Badger Army Ammunition Plant and will continue through the current efforts to develop and implement the consensus vision for the future of this long contested site.

Opportunities for outdoor recreation will include traditional activities (such as hunting and fishing) that have long been among the varied uses of the Badger property, and that contribute importantly to greater awareness of Badger's full conservation value. Of particular value are the property's important populations of grassland birds. The presence of these birds and other wildlife will attract thousands of visitors, as wildlife viewing continues to expand in popularity in the coming decades. Because the benefits of peace and quiet are among the most rapidly diminishing natural resource values in our contemporary environment, and consequently are among the frequently most sought after, a wide variety of low-impact recreational activities will be accommodated. The opportunity to explore the Badger property, especially given the promise of a regional recreational trail linking the



Sauk Prairie Recreation Area to nearby major regional trails, will draw thousands more to the area. Their experience of the area will be enhanced by interpretive trail signage and guided tours.

Eventually, the creation of a Visitor Center will serve as a focal point for orienting visitors and as a destination for students of all ages interested in exploring Sauk Prairie's unique geological, ecological, and human history. Visitors will be encouraged to participate in on-site restoration and citizen science projects.

Because agriculture is such a fundamental component of the Wisconsin economy and landscape, and will remain an essential tool for economic development and land stewardship in the future, creative opportunities will be provided for local family farm operators to participate in collaborative conservation agriculture research projects. Badger's landscape includes not only the SPRA but lands now held by the USDA Dairy Forage Research Center and potentially the Ho-Chunk Nation, offering a unique and remarkable opportunity to study new ways to combine agricultural production with the conservation and restoration of soils, water, wildlife, forests, grasslands and wetlands. Research and demonstration of innovative conservation agriculture practices such as managed, rotational livestock grazing to help control invasive plants and woody vegetation will benefit the land, our farming neighbors, Badger's recreational users, and the people of Wisconsin. Private landowners, volunteers, students, and community organizations will come to Badger and play an active role in these land restoration and stewardship activities. As Badger's landowners work together with visitors, neighbors, and partners, a changing landscape of row crop, pasture, restored prairies and savannas, and woodlands will provide a valuable model, showing how Wisconsin's land can support an agricultural economy that enhances farm families, local economies and farm communities, and healthy populations of native birds and other wildlife, in a public setting that can be enjoyed and appreciated by generations to come.



Specific Activities and Uses consistent with Conservation and Low Impact Recreation:

- Implement plan elements specified in the Badger Reuse Plan;
- Restore large, unfragmented tracts of grassland, wetland and shrubland (Habitat Management Zone)* to support native and migratory birds and wildlife;
- Restore remnants of native natural communities and the species they support (Native Community Management Zone)*; limit access to pedestrian use;
- Provide low-impact porous non-paved recreation trails that complement the topography and resource management;
- Preserve and enhance key vistas through vegetation management;
- Selectively site and construct (through community partnerships) a new visitor center with interpretation and educational opportunities;
- Provide interpretation and education opportunities about this property's history and geographic location, acknowledge Ho-Chunk Nation history and Euro-American histories and displacements, and the design, operation and decommissioning of the Badger Army Ammunitions Plant;
- Provide facilities such as a classroom, parking area, staging area, wash station and bathrooms near the Visitor's Center in the Habitat Restoration Zone;
- Identify and improve primary auto access roads through the property and deconstruct roads no longer needed. Limit vehicle access;
- Provide interpretation and education opportunities for schools and universities;
- Use volunteers to promote community participation in education and to help restore natural communities;
- Provide outdoor research opportunities for ecologists, scientists and students;
- Develop parking, picnic areas and viewing areas in the Expanded Recreational Zone* and to a lesser degree in the Habitat Restoration Zone*;
- Develop a fishing pier, canoe/carry-in boat access, and picnic area at the Lake Wisconsin parcel;
- Provide a multiple use trail connecting the Sauk Prairie area, Merrimac area, and Devil's Lake State Park via Burma road consisting of hiking and biking and a seasonal snowmobile trail on an agreed upon route;
- Designate parcel "M" and "M1" as a Habitat Restoration Zone*;
- Remove any unwanted infrastructure, buildings or debris that remains on the property, with the exception of infrastructure that may provide bat habitat and support bat research.

Note (*): The use of the term "Zone(s)" above is to maintain compatibility with language in other DNR proposed alternatives; BOMC members feel this term in most cases is too restrictive and exclusive for Badger lands which often have characteristics of one or more zone types in one area. Exclusive use zones may conflict with the first Value of the Badger Reuse Plan: to manage Badger as a whole.

HOW YOU CAN HELP:

As individual stakeholder members of the Badger Oversight Management Commission (BOMC), Citizens for Safe Water Around Badger, Sauk Prairie Conservation Alliance, and Wisconsin Wildlife Federation strongly urge the public to contact the WDNR with your **SUPPORT** for **BOMC ALTERNATIVE #4** by August 30, 2013. Comments may be sent to Diane Brusoe, DNR Planner - LF/6, Wisconsin Department Natural Resources, P.O. Box 7921, Madison, WI 53707 or email Diane.Brusoe@wisconsin.gov.

On Behalf of Sportsmen, the Sauk County Conservation Congress

Prior to the April 13, 1998 hearing (Spring fish and wildlife hearing) in cooperation with local outdoor recreation enthusiasts, the following resolution was submitted to all Wisconsin counties:

Whereas, the U.S. Army has announced that the 7354 acre Badger Army Ammunition Plant (BAAP) in Sauk county is no longer needed for military purposes, and

Whereas, under the Federal Lands-to-Parks program, the lands now occupied by BAAP would be transferred to the State of Wisconsin (WDNR) at no cost, and

Whereas the BAAP lies on terrain of the former Sauk Prairie and occupies a critical location in the Sauk county landscape, linking Devils Lake State Park, the Lower Wisconsin River, the Ice Age Trail and Baraboo Hills, and

Whereas protecting and restoring the natural resources of the State of Wisconsin will benefit ourselves and generations to come,

Now therefore be it resolved by the Sauk County Division of the Conservation Congress in annual meeting on April 13, 1998 the WDNR should use all means available to acquire the BAAP land for the purpose of managing restoration, preservation, and protection. Moreover the lands should be managed to allow public uses such as, but not limited to: hunting, fishing, hiking, biking and cross country skiing.

Submitted by

Roger A. Shanks

Box 1, Merrimac, WI

The resolution was submitted to a vote in 33 Wisconsin counties:

passed 1036-48 statewide, 46-1 Sauk County and 32 counties

rejected 11-13 Adams County only



The Wisconsin Society for Ornithology, Inc.

A Nonprofit 501(c)(3) Organization

Organized 1939, Incorporated 1942

The Passenger Pigeon,
Official Quarterly Journal
The Badger Birder,
Monthly Newsletter

August 28, 2013

WDNR
Diane Brusoe – LF/6
PO Box 156
Madison, WI 53707-7921

Dear Ms. Brusoe,

The Wisconsin Society for Ornithology (WSO) continues to take a vital interest in the Department of Natural Resources' efforts to develop a master plan for parcels it owns on the former Badger Army Ammunition Plant (BAAP). We previously provided comments on the DNR's Sauk Prairie Recreation Area (SPRA) Draft Regional and Property Analysis (RPA). Our interest was further demonstrated when during our 2012 annual convention, the society made the BAAP site a focal point of its field trips so that more than 80 members could observe the site and experience its remarkable birdlife directly.

WSO was organized in 1939 to encourage the study of Wisconsin birds. Our mission has since expanded to emphasize all of the many enjoyable aspects of birding and to support the research and habitat protection necessary to preserve Wisconsin birdlife. WSO strives to alert members and the public to situations and practices that threaten Wisconsin's bird populations. Our membership exceeds 1,400 from across the United States and around the world.

As noted in the draft RPA, grassland and shrubland birds, two bird communities of critical conservation concern in Wisconsin, benefit from a diversity of grassland habitat in large unfragmented tracts. Because the BAAP property presents such an extraordinary opportunity in this regard, WSO wishes to stay involved in the master planning process and to participate as needed to accomplish as much for birds on this property as we can.

We recognize that BAAP is a large area with lots of recreation potential. We also recognize the potential conflicts between habitat protection and recreational pursuits. It is our hope that the planning efforts for BAAP carefully consider the timing and location of any recreational activities, and that planning decisions are guided by sound land management and stewardship principles.

We want to reiterate the following from the Conclusion section of the RPA:

“The regional significance of the property's ecological capabilities sets the context for providing compatible recreation opportunities...”

“Within the larger Sauk Prairie Recreation Area landscape lays an incredible and unique opportunity to reestablish an example of the natural mosaic of prairie-savanna-woodland that characterized so much of the Midwest prior to Euro-American settlement, but which has since disappeared.”

“Major opportunities exist at SPRA with regard to breeding birds, as a result of the site’s rich avifauna, large size, extensive grasslands, public ownership, proximity to other significant public and private properties, and accessibility for research, education, and recreation. The property already has one of the most significant grassland bird populations in the state. It has been said that if grassland bird populations are ever to recover in the Midwest, it is essential that we learn how farming and wildlife can once again coexist. The SPRA in its entirety offers this opportunity.”

The Conclusion section also highlighted the key management goals identified by the Natural Resources Board in 2002 regarding the SPRA:

1. Maximize the potential for grassland and oak savanna restoration and public recreation.
2. Preserve and enhance the transition zone between the Baraboo Hills and the Badger prairie lands.
3. Preserve and enhance the ecological corridor from the Baraboo Hills to the Wisconsin River.

And finally:

“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.

With intensive agricultural practices in the USDA portion of the property and the uncertainty pertaining to ownership and future management of the Ho Chunk portion, habitat protection on the DNR portion of BAAP is critical.

The RPA states that the BAAP site “has one of the most significant grassland bird populations in the state.” The conversion of Badger to the SPRA is a unique opportunity to preserve and further enhance the remarkable grassland bird habitat at this site. We doubt the opportunity to restore or preserve a grassland of this size exists anywhere else in southern Wisconsin.

The RPA also identifies high quality shrubland areas (RPA Figure 2), prairie/savanna areas (area SPRA01, RPA pages 39-41) and the northern transition area into the bluffs (area SPRA02, RPA pages 36-37) as being high value resources. WSO considers all of these areas high value resources worthy of protection and enhancement.

The Conclusion of the RPA begins with the statement that “[t]he regional significance of the property’s ecological capabilities sets the context for providing compatible recreation opportunities.” The term “compatible” is critical. Recreational activities affect the landscape in many ways and no two activities have the same impact. WSO believes a planning priority should be to carefully design recreational activities in areas with exceptional natural resources, such as the high priority grasslands and shrubland parcels, the north transition area into the bluffs, the prairie/savanna area in the Magazine Area.

Unfortunately, as was the case with the RPA, the Draft Conceptual Alternatives contain no information on the potential impacts of the differing recreational options. Two possible activities, motorized recreation and a shooting range, however, are not likely compatible with preserving and enhancing the areas’ grassland birds. The lack of specific information prevents us from making any meaningful comments on the extent of their impacts to this important bird habitat.

As we noted in our comments on the RPA, birding and other nature studies activities is an important recreational pursuit for Wisconsin citizens. WSO would like to emphasize the great potential for the SPRA to become a major birding destination. The U.S. Fish and Wildlife Service estimates that 26 percent of Wisconsin’s residents enjoy birding as a recreational pursuit. During 2006, about 1,434,000 people were estimated to have engaged in some form of birding in Wisconsin and almost one-fifth of those birders were visitors from out-of-state.¹

As a final note, we want to reiterate that conversion of Badger to the SPRA is a unique opportunity to preserve and further enhance the remarkable grassland bird habitat at this site and we doubt the opportunity to restore or preserve a grassland of this size exists anywhere else in southern Wisconsin. Please emphasize recreational activities that are compatible with this areas’ remarkable resources.

Sincerely,

Michael John Jaeger

Michael John Jaeger
Conservation Chair
Wisconsin Society for Ornithology, Inc.
jaegermj@charter.net

¹ U.S. Fish and Wildlife Service, 2009, Birding in the United States: A Demographic and Economic Analysis, Addendum to the 2006 National Survey of Fishing, Hunting, and Wildlife-Associated Recreation. Report 2006-4



To: Diane Brusoe, Planner
Department of Natural Resources
101 S. Webster Street
PO Box 7921
Madison, WI 53707-7921

From: Madison Mennonite Church
P.O. Box 44522, Madison, WI 53744-4522
608-276-7680, www.madison-mennonite.org

August 25, 2013

Dear Ms. Brusoe,

Greetings from Madison Mennonite Church.

In sending our response to the recently issued Draft Conceptual Alternatives for the Sauk Prairie Recreation Area, we first want to thank all the DNR staff involved with the Badger Army Ammunition Plant lands through the years, and especially for how the Department has aligned itself with the Badger Reuse Plan (BRP), by having helped create the BRP and as a signatory of it; by citing a full range of values and goals consistent with the BRP as its intended "Program of Utilization" when making application to the National Park Service for acquiring its portion of the Plant lands from the Federal Government, thereby legally committing itself to such goals and values, including that of low impact recreation; by being a participating member of the Badger Oversight Management Commission (BOMC); and, by cooperating over the years with many other Badger-related organizations and individuals, making numerous positive physical and administrative contributions to the progress made thus far in implementing the Badger Reuse Plan.

We also need to provide a context for our response. Being part of the historic Anabaptist peace church tradition, the future of the closed Badger Army Ammunition Plant lands is a matter touching directly on the faith commitments of our congregation, and thus we have been involved at Badger since before the creation of the Badger Reuse Plan. Having in those early years investigated the issues surrounding the reuse of the plant, having met with and listened to many of the individuals, organizations, and governmental bodies involved, and having discussed and weighed the matter as a congregation, we became an early public advocate of the plan proposed for Badger by the Community Conservation Coalition for the Sauk Prairie (aka CCCSP, the organization which later became The Sauk Prairie Conservation Alliance).

To quote a portion of our August, 2000, public endorsement letter, "The gospel of Jesus says that the possibility of healing and reconciliation is always available to us. We are endorsing the CCCSP land use

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proposal because we understand that this proposal involves just such a transformation from the land's most recent uses, into more peaceful and life-affirming uses, for both the human community and the land itself. If people can work cooperatively in allowing this land once again to bloom as it did in former times, as the CCCSP proposes, an example of the restoration of harmony among people, and between people and the land could be passed down to future generations."

As the deliberations of the Badger Reuse Committee progressed, we were very happy to see the primary substance and spirit of the CCCSP proposal emerge in the Badger Reuse Plan (BRP), making the BRP in effect the logical extension of what we had earlier endorsed. And by further extension, it is because of the degree to which the BRP and its perspective has been embraced by the DNR over the subsequent years, including last year's Regional and Property Analysis document, that we can offer our praise and thanks to the Department and its Badger-related staff.

To more fully explain why our congregation concerns itself with how a former ammunition plant is used, we must reference the symbolic and moral weight of Badger's past history as a place of brokenness and violence, taken from Native American's, subsequently taken from farm families (including the family of one of our church members), and then made part of the machinery of warfare and destruction. This brokenness has continued on in the lives of those displaced from the land; in the pollution, ecological alterations, and aesthetic violations of the land; and in lands far from here where munitions from Badger were used. Therefore, we advocate that the lands of the former Badger Army Ammunition Plant be utilized in a manner congruous with its social and symbolic significance, as a place which can serve to illustrate the possibility of healing and renewal, a place where thoughtful consideration can be given to what its past, its present, and its future possibilities all signify, unencumbered by further continuations of its past.

Which brings us to the matter at hand: The three Draft Conceptual Alternatives.

Given our own hopes for the many socially and ecologically enhancing potentials available at Badger, and that we find the Badger Reuse Plan to be highly congenial to our hopes, comparison between the BRP and the Draft Conceptual Alternatives is the basis of our comments. Unfortunately, none of the three alternatives adequately express the full range of values and criteria delineated in the BRP.

Alternative 2 (Ecological Restoration Emphasis) is perhaps the more nearly congenial of the three, by combining restoration with low-impact recreation. But it basically leaves out such important BRP goals as research and integration of conservation and agriculture; and the responsibility for implementing public education and historical interpretation is limited to volunteers, which would likely result in very limited programming.

Alternative 3 (Outdoor Recreation Emphasis) does contain several recreational activities compatible with the other values and goals of the BRP, those being low-impact recreation trails, a visitors center, and historical interpretation. However, this Alternative places far too large an emphasis on automobile access, with drive-past style interpretive displays, "views", and "points of interest". And the most disappointing proposal is the "Special Use Zone" for ATV trails and a rifle range, which would more appropriately be named a "Sacrifice Zone", in that it encompasses an ecologically significant section of the plant, containing the plant's largest prairie remnant and ongoing restoration work site. In addition, these "high-impact" recreational uses would be in violation of the recreational uses to which the DNR agreed in its land transfer agreement with the National Park Service. Nor would such uses honor the sense of place and circumstance central to the Badger site, as noted above -- such uses would instead be continuations of the past brokenness.

And there are other important aspects of the BRP which are completely left out of all the Alternatives, the most important being collaborative management by the several land owners, including the DNR, of the Badger property as a single landscape unit; and the role of compatible agriculture, and integrated sustainable agriculture/land restoration research. The other two main landowners at Badger (Ho Chunk

and Dairy Forage Research Center) are not even mentioned as partners with whom to collaborate, despite this aspect of the BRP being explicitly emphasized by the DNR as an important component of its own intentions in the land transfer agreement with the National Park Service.

The best "alternative" for Badger is simply the Badger Reuse Plan itself, and the continuation of the DNR's effective embrace of it, evidenced by its own actions and commitments in the past, as noted above in our opening paragraph, and especially concerning the DNR/NPS land transfer application agreement.

To conclude, we wish to emphasize the historic opportunity represented by the Badger lands, as perhaps the final time such a large stretch of landscape can be added to the conservation legacy of southern Wisconsin. If this opportunity is properly managed to its full potential, it will be of multidimensional importance to the people of Wisconsin and the nation: significant ecologically, significant in new ways of collaborative management, and significant as to new ways of healing both the land and the human community. If mistakes are made in planning decisions, especially involving incompatible uses and their related physical infrastructure, those mistakes will be very hard to undo, and a wonderful opportunity will have been squandered.

Thank you for considering our thoughts, and for patiently engaging with the large amount of public response generated by the future of the Badger Plant lands.

On behalf of the congregation of Madison Mennonite Church,

Ron Adams, Pastor



Carl Stafstrom,
Chair, Church Life Committee

