

Response to questions on the cleanup and master planning efforts for Sauk Prairie Recreation Area submitted to the Department of Natural Resources by Representative Fred Clark and Senator Jon Erpenbach.

Q1: If the Wisconsin Department of Natural Resources has been participating in the re-use planning by being on the BOMC Board and attending the meetings over the years, has heard all of the concerns and comments by the BOMC Board and others from the audience – WHY did they not develop a re-use plan that represents the majority which is Alternative 4? EI: Why didn't DNR put forward a version of Alt. 4 on it's own?

A: In addition to proposing a “no action” alternative as required by state law, we’ve put forward two conceptual management alternatives that represented different approaches to meeting a range of conservation and recreation needs and opportunities. Our intent was to develop two alternatives that reflected different focuses and approaches, rather than a whole series of alternative approaches with slight nuances to use and management. The two alternatives are not “all or nothing” choices. Our hope is that the public will reflect on the range of conditions, needs, and opportunities at the property and provide feedback on what parts of the two management approaches they support, are neutral on, or oppose.

Many needs and opportunities were identified through the development of the Badger Reuse Plan. The department also received many ideas and perspectives from the public during the first phase of the master planning process about recreation and conservation possibilities and needs. In particular, the department received input to incorporate opportunities for ATVs and motorbikes, a shooting range, and other uses that went beyond what was included in the Badger Reuse Plan. The public comments received on the Regional & Property Analysis were summarized in September 2012 and are posted on our web site.

We’re pleased that others have proposed additional alternatives for the SPRA, as this will help us and the Natural Resources Board better understand the levels of support that exist across the spectrum of recreation opportunities, the nature of concerns, and potential ways to resolve them.

Q2: After identifying an area along the southern edge of Badger as a High Priority Grassland Bird Parcel in the DNR Regional and Property Analysis of July 2012, why is this same area designated as a Special Recreation Area (ATV track and shooting range) in Master Plan (draft) Alternative 3?

A: In July 2012 we published a Regional & Property Analysis for the Sauk Prairie Recreation Area. The purpose of an RPA is to describe past and current conditions (and their broader context) so as to be able to make informed decisions about the types of future uses and management strategies that could meet local, regional, and state needs. While the M parcel, much like other parts of SPRA has been disturbed, it does present an opportunity to restore rare natural communities and habitat for many grassland, savanna and woodland plants and animal. Identifying and describing areas such as this in an RPA document doesn't necessitate that future management will be focused solely on these attributes.

The department is charged with meeting a range of outdoor recreation needs, including motorized uses and shooting ranges. As the department develops the master plan, we believe it is appropriate to evaluate options to incorporate hiking, picnicking, bird watching, nature photography, horseback riding, and biking at the SPRA. The department also believes it is appropriate to evaluate options for including motorized uses and a shooting range. Although other sites within the SPRA were suggested for motorized uses and a shooting range, for a number of reasons, including a separate entrance apart from the main entrance to SPRA and keeping parcels to the north in large, unfragmented blocks, the "M" parcel appears to be the most appropriate area to consider these uses. No decision has been made about what recreational uses will be proposed in the draft master plan.

Q3: Has a market survey been done on the potential users of the specific type of ATV track envisioned under DNR Alternative 3? Over the past ten years, have other sites in southern Wisconsin been sought and evaluated for high impact uses? Where and with what recommendations?

A: We've received numerous requests over the last decade to provide additional opportunities for motorized uses, especially in the southern part of the state. The 2011-2016 Statewide Comprehensive Outdoor Recreation Plan (SCORP) identifies off-highway vehicle driving as one of the outdoor recreation activities projected to have increasing demand in Wisconsin. Off-highway vehicle registrations are trending upward in both the All Terrain Vehicle and Utility Terrain Vehicle categories.

We've evaluated several properties with an eye to creating a new motorized use area in southern Wisconsin, but to date we've not been able to acquire a large block of land capable of supporting a high quality motorized use experience at an acceptable price

Q4: Will the Special Recreational Activities have staffed oversight during hours of operation? If so, how will that be funded?

A: This question will be answered in the proposed master plan when we get to that stage in the master planning process. Any Special Recreation Activities proposed in the master plan will include guidelines for operation, management, and staffing of a special use area.

Q5: What are the priorities placed on the various restoration and program development areas in the SPRA? What will be funded and constructed first, second, etc.

A: There is a lot to be done on the SPRA and it will take time to complete the full transformation from a former ammo plant to the Sauk Prairie Recreation Area. The master plan will describe how the property will be managed, in terms of habitats and recreational facilities, as well as land acquisition goals. Typically a master plan doesn't describe the priority or order in which different management or development projects will be addressed.

We anticipate that SPRA will be handled a little differently. Given the amount of habitat restoration and management needed at the SPRA as well as the development of recreation facilities that are likely to be proposed in the master plan, the department anticipates tasks will be prioritized to some degree in the master plan. Top priority will be addressing issues related to safety.

The timing of when different projects are carried out is most influenced by DNR programs' priorities (such forestry projects, wildlife projects etc.) and the availability of funding. Funding for development projects has not yet been identified and not all projects will come from the same funding source. Depending upon the type of project, say a trail project vs. a wildlife project, funding would come from different sources and may be available for one and not for the other in a planning cycle

Q6: Will EPA impact studies be required for high-impact uses not put forth in the agreement between the state and the Department of Interior? What would be their timing?

A: Several steps remain in the master planning process. The comment period for the vision, goals, and conceptual alternatives closed on Aug. 30. We'll use this input along with other factors including the property's designation as a recreation area, physical attributes and limitations, and department priorities and policy mandates, to flesh out different alternatives for habitat management and recreational use of the property. We'll also begin to analyze any positive and negative impacts associated with different alternatives. The department will then develop a preferred alternative and present it, with preliminary analysis of the preferred alternative's impacts, to the public for review. We'll also identify the alternatives not selected.

Based on the significance of potential impacts resulting from the preferred alternative, the department will determine if an environmental analysis document or an environmental impact statement should be prepared. When that step is completed, the department will then draft the master plan along with an assessment of the impacts of implementing the plan. The department will consult with the Department of Interior throughout the process.

Q7: Did the Army clean up surface soils in all areas at Badger based on low-impact uses (such as hiking) or high-impact (such as ATVs)? Does this include surface soil in parcels M and M1 (Special Use Zone)?

A: Soil clean up levels at Badger must meet the U.S EPA "recreator" standard. The recreator standard does not distinguish between low/high impact uses. Parcel M was a non-production area and was only used for containerized storage of propellants. There is no known contamination on parcel M. An ATV use area, if included in the final master plan, would be placed in contamination free areas. Additional detailed information on cleanup of the Final Creek, settling Ponds and spoils disposal areas of SPRA parcel M1) are available at dnr.wi.gov and entering the search term Sauk Prairie Recreation Area. The DNR also hosted public open houses on cleanup of this area to answer questions and details of the cleanup.

Q8: In areas that have residual surface soil contamination, what exposures and health risks will be increased during high-impact activities such as ATVs that are expected to generate fugitive dust, increase erosion and disturb plant cover? How would limiting land use to low-impact activities reduce these risks and exposures?

A: User safety is of the highest priority on all DNR managed properties. Any potential increase in contaminant exposure risk that might result from “high impact” property uses will be addressed in the planning process.

Q9: The WDNR has suggested that certain high-impact recreational activities (like the ATV track) would “go around” areas with residual soil contamination, particularly in the “Special Use Zone”. Please provide a detailed map showing every single area, to scale, that has elevated residual soil contamination, and also indicating every location where no soil data has been collected.

A: The proposal for an ATV area is for areas free of contamination. We can provide the maps you request and will be glad to do so but they are too numerous to provide here. Please contact us if you would like a set of these maps. We also have informative maps available on our website including land use restricted areas, locations of monitoring wells and contamination plumes. Go to dnr.wi.gov and search for Sauk Prairie Recreation Area and then Maps.

Q10: What are the contaminants of concern that are still present in surface soil in the “Special Use Zone”? What are the human health effects associated with exposure to each contaminant? What are the contaminants present, such as lead, that are of particular concern to children and expectant mothers?

A: The contaminants of concern across the Badger property include: lead, 2,4-DNT, and 2,4-/2,6-DNT mixture.

The DNR, in partnership with the Department of Health Services, has evaluated the clean-up standards. In addition the DNR asked DHS to evaluate the potential exposure to contaminants for humans consuming animals that grazed on Badger. The full DHS report is available online. All health-based exposure scenarios used to calculate clean-up standards include and are based on the most vulnerable people, including children and expectant mothers. Health impacts depend on the contaminant, the exposure concentration, frequency and duration. Here are fact sheets prepared by the Centers for Disease Control for the contaminants of concern at SPRA:

Dinitrotoluenes: <http://www.atsdr.cdc.gov/toxfaqs/tfacts109.pdf>

Lead: <http://www.atsdr.cdc.gov/tfacts13.pdf>

Q11: Is it true that surface soil cleanup goals at Parcel M1 are higher than surface soil cleanup goals in other areas of Badger for certain contaminants? Please provide a table comparing cleanup goals for each contaminant of concern at different areas within Badger.

A: Clean up levels for the contaminants 2,4-DNT and 2,4-/2,6-DNT in parcel M1 meet the applicable U.S. EPA-approved goals of 25.7 parts per million (mg/kg) for 2,4-DNT and 11.7 parts per million for 2,4-/2,6-DNT mixtures. In other areas of SPRA, the Army’s cleanup efforts resulted in better-than-required levels for these compounds of 5.5 ppm for 2,4-DNT and 2.5 ppm for the 2,4-/2,6-DNT mixture. Cleanup of parcel M1 is discussed in detail in the report, “Final Determination of Feasibility for an Alternative Remedial Strategy for Soil of Final Creek, the Settling Ponds and the Spoils Disposal Area of the Badger Army Ammunition Plant, which is accessible online at dnr.wi.gov keywords Sauk Prairie Recreation Area under the tab, property cleanup.

Q12: In terms of public health, if land use in Parcels M and M1 is limited to low-impact recreation, is it expected that exposures and therefore risks to human health would be reduced?

A: User safety is the top priority for all DNR managed properties. Parcel M was a non-production area and was used only for containerized storage of propellants. There is no known contamination on parcel M therefore parcel M could be used for any activity, without restriction. Any proposed use of parcel M1 that would exceed the exposure assumptions used to assess human health risks in this parcel would require re-evaluation of risks based on the proposed use.

Q13: Given there is already elevated surface soil contamination in certain areas at Badger, what contaminants are released to the environment from a gun range and could this result in soil contaminant levels that are above desired levels, possibly requiring remediation?

A: The most common contaminant associated with gun ranges is lead from the lead shot/bullets being used. The United States Environmental Protection Agency has established best management practices at shooting ranges to allow for safe operation of the site including lead reclamation, as needed and proper site abandonment if the range use is discontinued. Often the "back-stop" berm at a shooting range does become contaminated with lead such that remedial efforts (often metal recovery combined with capping in-place) are required.

Q14: If a shooting range releases contaminants similar to those left by past Army activities, could this blur the lines of responsibility for cleanup? Under these circumstances, could Army argue that new owners caused or contributed to the problem if contamination is discovered in the future, inferring liability?

A: Contamination on Badger from past operations has been extensively documented. There are an ample number of soil sample locations and detailed maps of where and at what concentrations residual contamination exists. Any potential new contamination would be easily identified.

Q15: DNT contamination found in soil at Badger has migrated to groundwater causing widespread contamination in and around Badger. Testing by the Army has detected all six forms of the explosive DNT (dinitrotoluene) in groundwater. Qs: What are the concentrations of each of the six forms of residual DNT in SOIL? If Army only tested for two forms of DNT, could the TOTAL concentration of DNT in soil be underestimated? If so, could the total calculated risk to human health and wildlife be underestimated?

A: The U.S. Environmental Protection Agency, the Wisconsin Department of Health Services and DNR have looked closely at risks associated with DNT. There is concurrence between the EPA, DHS and DNR that there is no need to sample for all six DNT isomers in soil. The three agencies agree that risks are not underestimated and there is not a concern that the risk to human health and wildlife is underestimated. The question of groundwater standards is examined in detail in the Groundwater Alternative Feasibility Study and was the subject of a public open house.

Q16: The Wisconsin Division of Public Health recently issued a memo that found that consumption of meat from cattle from Badger may pose a risk to public health to both adults and children especially for bioaccumulative toxins like DDT and PCBs. Qs: What is the risk associated with consumption of milk and dairy products from cows at

Badger? Has this route of exposure been assessed at Badger? Is yes, what are the title, date, and author for this report?

A: It is important to note that contamination on SPRA is not uniform. There are large areas with no contamination. If dairy cattle were to be grazed on SPRA, these noncontaminated areas would be the most likely candidates for grazing and we would work closely with USDA Dairy Forage, University of Wisconsin and Department of Health Services in determining the best location and procedures for this activity.

In the case of wild game, DHS, at our request, did look for human health concerns associated with consumption of wild game harvested from SPRA. DHS concluded that there was no risk from consumption of wild game harvested on SPRA for even the most sensitive human populations. The complete DHS report is available at dnr.wi.gov by searching for Sauk Prairie Recreation Area and selecting the tab "property cleanup."

Q17: Are there still areas with residual surface soil contamination that could be easily cleaned up or covered up with clean soil, eliminating inhalation, incidental ingestion, and dermal contact as potential routes of exposure? If yes, how is this consistent with the department's directive for restoration of the environment to the extent practicable?

A: Wisconsin laws do not allow us to require a more restrictive clean up than what is appropriate for the intended land use. The U.S. EPA sets three levels of cleanup: residential, industrial and recreator. Terms of the land transfer from the Army to the state do not allow any future residential or industrial use of SPRA lands. In the case of Badger the "recreator" standard is the applicable standard. The clean-up approved by the DNR meets this condition, so no additional clean-up could be ordered by the State.

Q18: If WDNR has approved soil cleanup that does not allow for unrestricted future use, can the State (as a potential landowner) require this as a condition of transfer?

A: As described in the previous question, DNR has prescribed the most restrictive cleanup requirements possible based on the intended recreational use of the property. The Army has met the applicable regulatory standards. As a potential landowner, DNR could refuse to accept ownership of a parcel in its current condition. In such a situation, the parcel would remain as surplus property under the federal General Services Administration and subject to future, unknown, disposition.

Q19: What biological and ecological resources and systems are present in the "special use zone"? How will ATVs and a shooting range compliment and benefit these resources?

A: The biological and ecological resources present in the special use area ("M" parcels) are described in the RPA and include habitat for grassland birds.

Anticipated impacts (positive and/or negative) of a proposed use or management of the property will be described in the master plan. This will include a description of likely impacts from recreational uses (including motorized uses and a shooting range, if proposed) on the biological and ecological resources present in the area.

Q20: WDNR has identified the ATV/gun range area as CRITICAL shrubland and grassland bird habitat. There is a successful bluebird trail throughout most of this land parcel – it has at least 80 bluebird houses. Q: How will ATVs and a rifle range compliment and benefit shrubland birds, including breeding and nesting success?

A: The master plan will include an environmental assessment describing the likely impacts from recreational uses (including motorized uses and a shooting range, if they are proposed) on the breeding and nesting success of bluebirds in the area.

Q21: Parcel M is also home to the best and largest remnant prairie on the entire Badger property. Volunteers with the Sauk Prairie Conservation Alliance have been working on restoring this beautiful prairie for years. Q: How will ATVs and a rifle range compliment and benefit prairie and other ecological restoration at and near Badger?

A: Current plans call for approximately 3,800 acres of Badger's 7,400 acres to be transformed into the Sauk Prairie Recreation Area. USDA – Dairy Forage would take 2,100 acres and the Ho-Chunk Nation, 1,500. The area considered potentially suitable for motorized recreation is within parcels M and M1 and is roughly 500 acres. The area of the prairie remnant restored by the SPCA is roughly two acres and DNR estimates the area of Parcel M that could be a core prairie area at 17 acres. If motorized recreation or a shooting range are proposed in the master plan, acreage devoted to these uses could reduce the acreage available for the restoration and management of native habitats in Parcels M and M1. An environmental assessment completed in association with the master plan will describe the likely impacts from all recreational uses that are proposed. Department staff could work to locate any ATV routes or a range to avoid/minimize impacts to the prairie remnant. We do recognize the efforts of the Sauk Prairie Conservation Alliance to restore, to the extent possible, examples of what the prairie looked like prior to disturbance and the contribution a prairie remnant of this kind can have in any future educational and historical interpretive programs established at SPRA.

Q22: The southern portion of the proposed ATV/range area is classified as meadow wetlands. Q: How will ATVs and a rifle range compliment and benefit this wetland ecosystem and its recovery/restoration?

A: An environmental assessment will describe the anticipated impacts of all the habitat management and facility development laid out in the master plan. For clarification, although the special use area described in Conceptual Alternative 3 and depicted in the associated map included all of the "M" parcels, the immediate area where the settling ponds and wet meadow are located (within M1) would not be appropriate for developed recreational uses.

Q23: The Army's cleanup efforts have caused great disturbance in the Settling Pond area which has been identified as a meadow wetland. Such disturbance requires a permit under the Clean Water Act, which in turn requires that wetlands are delineated. Q: Why haven't regulators required the Army to get a permit and delineate the wetlands at Badger pursuant to the Clean Water Act? How could this information better inform and benefit the Department's current land use planning efforts?

A: The Army removed contaminated soils from the settling ponds area as part of the cleanup process. All applicable cleanup goals for this area have been met and the area meets the same recreator cleanup standard used for all other areas of Badger. Any proposed future use of the settling pond area would include an analysis of impacts expected from the proposed activity. This would include delineation of any existing wetlands in the area if wetland disturbance is anticipated.

At the time of this cleanup work, the settling pond area wetlands were under federal ownership and therefore, in the Army's view, not subject to state jurisdiction. We also believe this to be true but have asked our legal staff to confirm this belief.

Q24: What are the asbestos fiber counts and identified forms of residual asbestos found in surface soil at the Settling Ponds, an area the received wastewater and stormwater runoff for much of Badger?

A: An extensive and thorough asbestos survey of the former Badger facilities revealed no upstream source of asbestos that would result in asbestos deposits in the settling ponds area therefore sampling for asbestos is not called for in this area. All asbestos present in the former Badger plant was removed and disposed of according to approved protocols and procedures.

Q25: The impact of ATVs and a gun range will affect the quality of life for neighboring residents and farms by disturbing the peaceful sound environment, as well as disturbing wildlife and livestock. Located adjacent to Lake Wisconsin, sound is expected to carry great distances. There are homes and families and agricultural land on all four sides of the proposed ATV track/gun range, including the Dairy Forage Research Center farm and the Water's Edge, Gruber's Grove Bay and the Windings neighborhoods. Further, the Badger property is zoned exclusive agricultural or agriculture conservation, in accordance with the existing land use plans of Sumpter and Merrimac Townships. Q: Will the WDNR withdraw its proposal for an ATV track/gun range if the affected community finds that it is inconsistent with local zoning and/or is not supported by local government?

A: The department has the responsibility to address conservation and recreation needs of statewide importance or significance. In carrying out its responsibilities, the DNR strives to work cooperatively with local governments and citizens to acquire and manage state properties that are supported by most residents. Although not all citizens are in favor of the department's efforts to acquire and manage its portfolio of parks, wildlife and fishery areas, forests, recreation areas, and natural areas, most residents and their elected representatives are. At times, the department moves forward with projects to meet broader conservation and recreation goals that are not supported by some local residents. A good example is the establishment of boat launches, which are sometimes opposed by local property owners but serve a broader public need.

We will continue to work with local governments on the use and management of the SPRA in an attempt to find mutually acceptable outcomes.

Q26: According to the WDNR, there are already many shooting opportunities in the area – there are at least 17 shooting ranges and clubs within 30 miles of Badger. Q: If the state has available funding for shooting ranges, what are the potential benefits of

improving EXISTING ranges? For example, wouldn't it keep more land at Badger available for other uses?

A: There is an important distinction between public shooting ranges and those owned and operated by clubs. Public shooting ranges offer shooting opportunity without the requirement of a club membership. Experience at our current public shooting ranges indicates there is interest and desire for publically owned facilities even when private or club shooting ranges are in the area. Public funds are available for shooting ranges but they must be open to the public on a non-membership basis to qualify. We welcome contact from existing local ranges seeking funding for range improvements but in order to do so, it must be open to the general public. We've met with representatives from area shooting ranges to discuss the concept of a public range at SPRA and in general have not heard any concerns with a public rifle and hand gun range on SPRA.

Q27: The proposed ATV site at Badger is isolated and considered quite small for this type of activity, according to presentations by DNR staff. Further, Badger is surrounded on all sides by protected natural areas. Q: What are the advantages of investing in ATV recreation in an geographic area with the potential for connection to a regional trail system?

A: The Special Use Area identified in Alternative 3 includes approximately 600 acres, of which the M parcel is 385 acres. The department operates an ATV riding area at Bong Recreation Area that is similar in size, with about 4.5 miles of trails. While not extensive, this area could provide a quality riding experience in part of the state where riding opportunities are limited at present.

Q28: The historic Thielke cemetery is on the same land parcel proposed for ATVs and a gun range. Many of the families with relatives there still live in the Sauk Prairie area. Q: How do ATVs and a gun range, and the nuisance issues associated with these activities, compliment cemeteries and visitors on the same land parcel?

A: Interactions of this kind will be evaluated in the environmental assessment associated with the master plan. The EA will describe the anticipated impacts, including impacts to visitors to cemeteries, of all the habitat management and facility developments described in the master plan.

Q29: The Badger Reuse Plan represents the consensus of 21 representatives of local, state, federal and tribal units of government (including WDNR!) as well as neighboring landowners, businesses, school districts and nonprofits. The public plan emphasizes conservation and LOW-impact recreational activities and it is still in effect today. Given the very significant time and resources invested in the Badger Reuse Plan, this alternative certainly had a **VERY** high potential for great public acceptance and support. Q: So **WHY** didn't the WDNR propose a conceptual alternative that is similar to the Badger Reuse Plan?

A: Conceptual Alternatives 2 and 3 present the components of the Badger Reuse Plan with different emphases. Alternative 2 focuses on the ecological management and restoration of the property with limited facilities for recreation. Alternative 3 presents most of the recreation experiences described in the Reuse Plan (including horseback riding and motorized recreation which were part of the discussions leading to the Reuse Plan, but for which consensus among the committee was not reached) and a shooting range. As the Reuse Plan states, it provides a common vision for the reuse of Badger that can be meaningfully

considered and realistically implemented by the appropriate federal, state and local agencies. Although Conceptual Alternatives 2 and 3 are different in some important regards, the department believes that both share many similarities with the Reuse Plan.

Q30: How can we, the citizens of this area and the greater State of Wisconsin, be assured that the WISC DNR will include Alternative 4 in overall Sauk Prairie master Planning Document for the Badger Ammunition Site?

A: Alternative 4 has been included in the comments received on the conceptual alternatives and as such will be included in the materials used as the department begins development of the master plan. The department is appreciative of the effort invested by those involved with the development of Alternative 4.

Q31: If the National Park Service does in fact determine that the Gun Range and the ATV Track present “substantial changes” to the application agreement – how much time will going through that process add to the transfer process? What does that process look like? Who conducts the environmental impact activities that would be necessary for the Application alteration?

A: We suggest you contact Elyse LaForest, program manager, federal lands to parks program, National Park Service, at 617-223-5190 for answers on questions about the process.

NOTE: Questions are reprinted here exactly as received