

Sauk Prairie Conservation Alliance

Comments on WDNR's Draft Master Plan and Environmental Impact Statement for the Sauk Prairie Recreation Area (SPRA)

September 2015

This document summarizes the Sauk Prairie Conservation Alliance's issues and concerns with the draft master plan for the SPRA. These comments are based upon and reference the legally binding documents by which WDNR acquired the Badger property, including the Final Report of the Badger Reuse Committee (2001), the National Park Service Application by WDNR to Acquire Surplus Federal Property (2004) and the Regional and Property Analysis for the SPRA (2012).

This review is based on WDNR's pledge to use the property:

- *Focused primarily on ecological restoration and habitat management, while*
- *Providing low-impact recreation, and*
- *Only recreation that is compatible with the restoration goals.*

We offer reasoned and pragmatic alternatives (proposals for improvement) for the activities the Alliance believes are incompatible and/or inappropriate, in order to assure that the Plan closely adheres to the originating documents and WDNR's obligations and commitments contained therein.

I. Ecological Restoration & Habitat Management

The WDNR is to be commended for acknowledging the unique opportunity that SPRA represents for creating a remarkable landscape-scale ecological gradient restoration that transitions from riparian edge to open prairie/grassland to oak opening to oak woodland. The draft plan's long-term (50-year) vision for restoration of the SPRA landscape is well conceived and generally well defined. Unfortunately, the proposed recreation often pre-empts restoration, and in fact in some cases is incompatible with restoration. Priority is clearly given to recreation over habitat management, both in allocation of the land management classification and also in the proposed budget. This approach is not in agreement with the NPS application.

A. Management Area Designations within the SPRA are primarily recreational use (62%) rather than habitat or native community management (34%). Only 17 acres, 0.5

percent of the property, are classified as a Native Community Management Area, yet many acres have historically been found to contain important native species and relict native habitat. The proposed landscape management of the property targets over 90% of the land to ultimately be restored and managed as native communities.

Proposals for Improvement:

1. Place primary emphasis on ecological restoration and habitat management as the core of the SPRA Plan. Create a more equitable balance (e.g., 60-70% or more habitat management) between designated recreational and habitat management areas, and expand native community management to reflect the existence of remnant native community sites. Ideally, the property would have a landscape-scale restoration plan (90+%) within which compatible, low-impact recreation could be subsequently planned.
2. Provide a budget and proposed allocation for habitat restoration in the plan that reflects its high priority within the property. WDNR rightfully argues that immediate habitat management is essential to halt the rapid encroachment of shrubs into former grassland habitat, and an adequate up-front and continuing budget should reflect this urgency.

B. Recreation Area. It is widely understood that designating the publicly-owned property at Badger as a “recreation area” instead of a state park, wildlife area or other public land designation, gave the agency greater flexibility to plan and support ecological restoration while also planning for low-impact and compatible recreation. However, the recreation focus in the Plan has a much greater emphasis than the restoration component. Numerous “I want this” recreation proposals from small special interest groups have continued to creep into the planning process for this property, even up to and including this last draft of the master plan. This property’s unique opportunity to vitally function as a restored grassland supporting rare grassland birds and as an Important Bird Area is almost negated if the property serves as a recreation area responding to all special interests.

Proposal for improvement: While the recreation area designation will undoubtedly remain in place, the NAME of the property can be changed to better reflect the ecological value of the site. For example, changing the name to “Sauk Prairie CONSERVATION Area” would be appealing and appropriate, and would fit nicely with the adjoining and nearby protected landscapes. As the Ho-Chunk Nation is considering naming its northwest section of Badger, WDNR should join the Nation in conversation to consider sharing a Native name. This would serve to begin fulfilling Value 1 of the Badger Reuse Committee Report, i.e., to treat the property as a whole.

II. Recreation

Many of the Plan's recreation activities are low-impact and in compliance with WDNR's commitment for use of the property. Some proposed recreation options are high-impact and should be eliminated completely from the Plan. Other proposed recreation activities may be incompatible with ecological restoration and even incompatible with low-impact and "silent" recreation activities. The draft plan appears to be a "catch all" for many types of recreation not permissible in a state park, and special interest groups' pet recreational activities have been inserted into the Plan. Many proposed uses, therefore, are incompatible with other uses. The most ignored users—and arguably the best represented from a demographic perspective—are the many individuals and families who will come to the SPRA for a quiet, peaceful experience in an open grassland landscape. Whereas generally our environment is filled with noise and commotion, solitude and quiet can still be found in a vast prairie. That is the opportunity and attraction of a landscape of this acreage. The Plan, if implemented as it is written today, would greatly impede the quiet appreciation of the SPRA by the majority of users.

A. High Impact Recreation

1. A proposal for a **shooting range** was evaluated more than a decade ago by the Badger Reuse Committee and was scored low according to the consensus criteria. A shooting range was again considered as a recent conceptual alternative for the SPRA. This proposed use of the land is contrary to WDNR's commitment to low-impact recreation, and widespread public sentiment was clearly opposed to a shooting range at SPRA for over a decade.

Proposal for improvement: No further consideration should be given for a shooting range at any time in the future for the SPRA.

2. **ATVs** were initially considered as a conceptual alternative for the SPRA. ATVs clearly represent a high-impact use of the property, and as such, are inappropriate and incompatible with other uses.

Proposal for improvement: No further consideration should be given for ATVs at any time in the future for the SPRA.

3. **Dual-sport motorcycles** are arguably loud, disruptive and can have as much impact on the land (e.g., soil erosion) and the quality of other visitors' experience as ATVs. Motorcycles were never considered as an acceptable recreational activity during the early planning stages at Badger. No matter how limited the proposed use of the property by off-road motorcycles, this is an incompatible high-impact activity that is inappropriate for SPRA. Allowing motorcycle use on trails, even for a short time frame, would keep the door open to increased motorcycle use in the future of the property.

Proposal for improvement: Remove all reference to dual-sport motorcycles in the final SPRA master plan.

4. **Model and High Power Rockets** are a high-impact recreation activity with certain inherent risks. Shooting propellant-fueled rockets from and into a grassland could cause a spontaneous fire upon ignition. Whereas that may be good for the prairie, it represents a significant liability issue for WDNR. Were an errant rocket to land on neighboring DFRC property, permission to access DFRC land to retrieve rockets is not guaranteed, and occasional visitors to SPRA may not be aware of access restrictions elsewhere at Badger.

Proposal for improvement: Remove all reference to rockets from the Plan as an incompatible, high-impact and potentially harmful activity.

5. **Snowmobiles** represent a noisy, high-impact motorized recreational activity and should not be considered as appropriate for the SPRA. The Alliance acknowledges the existence of a historic snowmobile route on the perimeter of the Badger property and would accept formal designation of that trail for land owned by the state. Use of the Great Sauk Trail that runs through the middle of Badger is not acceptable as a snowmobile route. There could easily be snowmobile user conflicts on Ho-Chunk and Dairy Forage Research Center properties.

Proposal for improvement: Support the BOMC-endorsed creation of a permanent snowmobile trail along the perimeter of the SPRA and oppose any snowmobile trail suggested for the interior of the Badger property on or adjoining the Great Sauk Trail.

6. **Wisconsin National Guard Helicopters.** The training flights by Wisconsin National Guard helicopters over and landing on the SPRA are not recreational and are a high-impact activity within the property. Furthermore, the flights may be in direct conflict with recreational users on the SPRA, especially those individuals who enjoy "silent sports" and who desire a quiet peaceful place to get away from urban noise. Furthermore,

there are inherent risks in flying military aircraft over a publicly used landscape. Finally, the Plan does not reference any environmental impact analysis of military activities (e.g., flight paths, noise, soil disturbance, dust, night operation, safety concerns, and procedures in case of a crash).

Proposal for Improvement: WDNR should no longer allow military helicopter flights over the property once the master plan has been approved. Should WDNR decide to continue to allow helicopter flights, the agency should collaborate with the Guard on development of an extensive environmental document (EA or ER) to assess the impacts of military use of the SPRA and enter into an agreement that limits use and mitigates impacts based on the EA.

B. Other Recreation

1. **Hunting.** The proposed hunting season for the entire property is October 15 to May 26, corresponding with the end of the six turkey seasons. SPRA is not a wildlife area, but a recreation area. The use of the property by those seeking silent recreational endeavors should not be compromised by fear of interactions with hunters nearby nor the sound of gunfire throughout an extended hunting season. The sound of gunfire carries a considerable distance over an open grassy landscape; WDNR has not shown that it has undertaken acoustic studies to determine the impacts of hunter gunfire to the experience of other users on the property.

Proposal for Improvement: Limit hunting season on the property from November 15th until May 1st. This more abbreviated hunting season allows for all fall and spring hunting with the exception of three turkey seasons, while simultaneously accommodating outdoor recreationists (bikers, hikers, horse riders) during some of the best times of year—fall and spring—who desire a quiet and peaceful natural experience.

2. **Dog Training.** A 72-acre dog training area is proposed for the farthest southwesterly area of the Magazine Area adjoining DFRC land, but there has been no presentation of need in any Badger land management or planning forum for such an exclusive use area. Dog training/trialing was never considered through the 18 years of planning at Badger. Therefore, this new proposal appears to be inserted to appeal to a late-entry special interest group. This activity requires the discharge of firearms with every training event, which can, according to the Plan, “provide a high-quality, year-round experience” on the site. The Alliance sponsored an acoustic study in 2014 which concludes that grassland bird nesting may be negatively impacted by the shooting of

firearms. DNR has not evaluated the potential impacts of gunfire noise on nesting birds, nor has it done its own acoustic study to determine the impact to “silent sport” recreationists elsewhere on the property. Consideration needs to be given to the impact of gunfire upon grazing cattle on the adjoining DFRC property. Another consideration is gunfire impact on unleashed dogs adjoining the training site. Many dogs are expressly alarmed at gunfire, and tend to flee from loud noises. At the present time two adequate dog training/trialing areas exist within 20 miles of the Badger property (Mazomanie & Pine Island, both with vast acreages). Obviously there is more than adequate opportunity in the area for dog trainers in southern Wisconsin.

Proposal for Improvement: Remove the proposed dog training area from the Plan until WDNR undertakes a thorough needs analysis and an acoustic assessment of noise impacts on rare grassland species, visitors and unleashed dogs. Include a proposal for seasonally limited dog training only after impacts are assessed and only if DFRC concludes that dog training represents no conflict to their operation. Restrict dog training to dates outside of grassland bird nesting season and to the more limited hunting season proposed.

3. **Mountain Bikes.** Mountain bikes can have a significant and adverse impact on trails, causing erosion on steep grades and certain soil types. The draft plan offers no consideration for analyzing potential negative short-term and cumulative impacts of mountain bikes, nor is there a process in place to review and mitigate any future cumulative impacts due to the use of mountain bikes.

Proposal for Improvement: The Plan needs to demonstrate that the agency has studied the potential cumulative impacts from mountain bikes and has included a process to review and mitigate those impacts if they occur. If mountain biking is included in the final plan, care should be taken to avoid the steepest slopes and the most erodible soils on the property. Mountain bikers will undoubtedly want any SPRA trail(s) to continue into Devil’s Lake State Park, and any planned trails should be done with an eye toward this future request and potential impacts.

4. **Horses.** As with mountain bikes, horses can also have adverse impacts on trails, especially after a rain event when hooves can tear a grassy substrate and lead to soil erosion and muddy pockets on the trail. Invasive species often are spread on horse trails by seeds carried in horse droppings. The plan does not consider the cumulative impacts of horses on trails, nor does it address a process for mitigating damage done by horses.

Proposal for Improvement: The Plan needs to demonstrate that the agency has studied the potential cumulative impacts from horses and has included a process to review and mitigate those impacts when they occur. Any horse trails included in the final plan should avoid the steepest slopes and the most erodible soils on the property. If horse trails become badly eroded, WDNR should be prepared to close trails indefinitely, or until the damage has been mitigated.

5. **Special Events.** The Alliance is pleased that WDNR staff described, at the September 10, 2015 public hearing, some possible special events that might be considered for approval on SPRA. As written, special events may be proposed for a portion or all of the SPRA. A special event permit would exclude all other users of that portion of SPRA for up to five, four-day weekends a year, or potentially more days if some events are held on weekdays. Exclusive use given to a special interest group is inherently unfair and unjustifiable, as it would block general public access to a portion of the property for the normal suite of recreation uses. The Alliance has a 17-year history of helping with management and restoration of the “Hillside Prairie” within the Magazine Area that is designated in the Plan for special events. It is very possible that volunteer work days at the Hillside Prairie could be in conflict with proposed special events, and access to the volunteers could possibly be denied. With limited staff, extremely limited funding and an admission that WDNR will not oversee special events, WDNR should simply avoid inclusion of any special events in the Plan. The agency’s limited resources are better used for its core mission: to protect and enhance our natural resources.

Proposal for Improvement: The Alliance disagrees fundamentally with the creation of any and all “exclusive use” areas on the SPRA, as that would limit citizen access to portions of the property on any given day. Some individuals may prefer spending time in the Magazine Area, and they have the right to do so. “Special events” are of extremely questionable value to this property and could conflict with other acceptable recreational uses. Reference to a special events area should be eliminated from the Plan. Instead, the Magazine Area in its entirety should be incorporated into the diverse trail system proposed for the other segments of the SPRA, with a focus on hiking trails. If WDNR elects to keep special events in the Plan, it should also include a listing of specific acceptable special events and WDNR should strictly adhere to those limited uses. Furthermore, special events should be limited to no more than a total of 6 days/year.

6. **Hiking Trails.** While it is understood that the placement of trails in the draft master plan is conceptual only, the Plan gives disproportionate priority emphasis to proposed horse and street bike trails over hiking trails. It is perhaps assumed that hikers will want

to walk on horse trails or street bike trails, but this may not necessarily represent the interests of the hiking population. There can be conflicts and unsatisfactory visitor experiences if different types of users (e.g., hikers & horses) are on the same trails; hikers may tend not to use trails used by horses or bikes. Hikers undoubtedly will represent the largest demographic of users at Badger, as is observed at Devils Lake State Park and virtually all state parks in Wisconsin. One of the original goals with the WDNR's unusually-shaped property was to connect Lake Wisconsin to the Baraboo Bluffs, and eventually to Devil's Lake. That corridor should support a hiking trail network, providing access to all segments of the SPRA property. Arguably, hiking trails are the easiest to build and maintain compared to other trails. In light of a very limited anticipated budget for the property, WDNR could accommodate a large number of recreationists at SPRA for modest funding by planning a lengthier hiking trail network.

Proposal for Improvement: Expand the number of miles of hiking trails, and develop an extensive network of hiking trails that are independent from other trail uses. Additionally, due to the large size and potential isolated recreational experiences at the SPRA, manage at least some areas for the more primitive types 1 and 2 recreation.

7. **Drones.** Although the use of drones is, for the time being, not allowed on state land, the possibility exists that this recreational use, becoming ubiquitous across the country, will experience a groundswell of support and an interest in flying drones at the SPRA.

Proposal for Improvement: WDNR should be pro-active in anticipating this potential (inevitable?) future recreational interest at SPRA and include reference to a clear process and procedure for reviewing and evaluating any such proposed drone use on the property. There could be potential harm to grassland nesting birds, for example, if drones are flown during the breeding season.

III. Infrastructure & Management

A. Visitor Center/Office. The 2001 Badger Reuse Plan, to which the WDNR is a signatory, very specifically states that the Badger lands, whoever their eventual owners might be, should be *managed as a single, cohesive property*. In its application to the National Park Service, the WDNR stated it would plan for the entire Badger lands and not just their own portion of the property. The WDNR's plan for the SPRA is a stand-alone document that includes few references to the plans of other Badger landowners. There is little reference to future collaboration with other landowners on issues of mutual interest. The most obvious omission is lack of consideration for a combined visitor center/museum to serve visitors to all of the

Badger lands. The Badger Reuse Committee, in its Final Report (2001), envisioned a single “centralized museum/visitor center and multi-use educational facility” to serve the needs of all future landowners and their constituent visitors.

Proposal for Improvement: WDNR needs to partner with Ho Chunk Nation and the Dairy Forage Research Center, to plan, seek funding for, and construct a large centrally located, easily accessible visitor center /museum with extensive interpretive exhibits and adequate office space for each landowner. Clear reference to such a collaboration should be included in the final plan.

B. Parking Area/Amphitheater. The draft plan proposes a large parking area (50 spaces) and amphitheater at the most northern portion of the SPRA property, near the water reservoirs. Understandably, the removal of the reservoirs will ultimately leave a large gap, but a large parking lot is not an imaginative use of this special site. Certainly, there will be visitors interested in visiting the overlook area, but it is unclear that many people would drive the distance to attend an event at such a remotely sited amphitheater.

Proposal for Improvement: An amphitheater, if deemed necessary, could be better sited adjoining or near the visitor center, wherever that is eventually located. Similarly, a larger parking area should be planned for near a (shared) visitor center with a concurrent reduction in the size of the parking area where the reservoirs are now.

C. Budget. The draft plan offers only limited clarity of potential costs, and the costs of restoration are not expressly and clearly stated.

Proposal for Improvement: The final plan should include a well-defined budget that clearly demonstrates priority activities, staffing needs, infrastructure and a timetable for implementation. Arguably, as WDNR has identified, extensive restoration work needs to be implemented in a short time span to begin to address the encroachment of aggressive invasive shrubs into grassland habitat. This should be given high priority, even before recreation infrastructure is put in place. The budget and timeline should reflect this priority.

D. Collaboration. While this draft plan addresses some opportunities for problem solving with adjacent land owners, Ho-Chunk Nation and Dairy Forage Research Center (e.g., Otter Creek flood issues), it neglects to include and identify plans for landscape-scale collaboration on a multitude of activities, together with the co-

owners of the Badger lands. Most importantly, it does not fulfill one of the primary conditions of the transfer of this property, to manage the property as a whole.

Proposal for Improvement: Develop a clear and thoughtful new section of the Plan that addresses areas of collaboration with the other landowners at Badger, thereby treating all 7,400 acres as a property of the whole. This narrative and plan should include property-wide planning of infrastructure (roads, trails, visitor center, interpretation sites, etc.), ecological restoration, scientific and historical research, and education, among other shared themes and interests.

Each of the suggested improvements that we offer to WDNR's draft master plan will benefit the people of Wisconsin and this unique property. We whole-heartedly support and endorse WDNR's statement in the Plan:

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

We concur with WDNR's acknowledgement of the once-in-a-lifetime opportunity this property represents to the citizens of Wisconsin. We should not view ourselves as consumers of this landscape, but rather as its caretakers. It is our responsibility to heal this land that has been so mistreated in the past. We stand with WDNR to fulfill this landscape's highest and best ecological opportunities while offering low-impact recreation to our many citizens.