

HO-CHUNK NATION

OFFICE OF THE PRESIDENT

Wednesday, August 28, 2013

Diane Brusoe, Planner WI Dept. of Natural Resources PO Box 7921 Madison, WI 53707-7921

Mark Aquino, Regional Director WI Dept. of Natural Resources 3911 Fish Hatchery Rd. Fitchburg, WI 53711

Dear Ms. Brusoe and Mr. Aquino:

The following comments are being submitted in response to the WDNR Sauk Prairie Recreation Area (SPRA) Draft Conceptual Alternatives.

The Ho-Chunk Nation has requested the transfer of an estimated 1552.5 acres of the Badger Army Ammunition Plant (BAAP) declared as surplus pursuant to 25 U.S.C. δ 450j(f)(3). This acquisition is for the use and benefit of the Ho-Chunk Nation and their People.

The Ho-Chunk recognize the former Badger Army Ammunition Plant (BAAP) property as part of their aboriginal lands that span the southern two thirds of Wisconsin from the Green Bay area westward into Minnesota and then south including areas of northern Illinois. Within this area lays thousands of years of ancestors, traditional villages and spiritual sites attributed to the Ho-Chunk People. Specifically, the BAAP property falls within a cultural district that is an important part of a Traditional Cultural Properties (TCP) associated with the Day-wa-kun-chunk, or Holy Lake (Devils Lake) area. Historically, the areas south of Day-wa-kun-chunk provided an area where traditional crops such as corn, squash and beans could be readily farmed, medicinal plants could be gathered and seasonal game could be harvested. Along with this, there are culturally significant sites still spiritually and physically intact which the Ho-Chunk recognizes. The Ho-Chunk considers the BAAP property an important part of what makes this area spiritually whole.

In respecting this history and the land, the Nation has developed a draft land management plan that focuses on the restoration and enhancement of the natural habitats at Badger including prairie, wetlands and oak savanna. Restoration and land management is intended to be a cooperative effort with stakeholders and landowners including the WI

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Dept. of Natural Resources. Restoration activities will complement the future establishment of a bison herd on the Badger property and promote conservation agriculture as a land management tool. These concepts are the building blocks for Badger becoming a model of cooperation and are part of the shared vision summarized in the final report of the Badger Re-use Committee (BRC). The 21 member BRC, consisting of stakeholders and various governments, clearly defined nine key values to guide consideration of future use with the premise that Badger lands provide remarkable opportunities for the protection, enhancement, use, restoration, and enjoyment of the property's unique natural and cultural features. The Wisconsin DNR accepted the values and guiding principles established by the BRC in the final Re-use Plan. The Wisconsin DNR did this by signing the January 2002 Memorandum of Understanding between stakeholders to address the future use of the Badger Army Ammunition Plant and, specifically, agreed that the Badger Army Ammunition Plant premises would be used for purposes consistent with the Badger Re-use Plan.

The establishment of a Special Use Zone in the WDNR Alternative 3-Outdoor Recreation Emphasis is *inconsistent* with the values and criteria found in the BRC report, conflicts with the missions of the surrounding landowners, and is contrary to the agreement made by the WDNR when it signed the MOU. A shooting range would generate more concentrated year-round noise from gunshots than that resulting from any normal hunting activities allowed on the property. This noise would affect the Nation's use of the property and may also affect the Nation's bison herd once established. Similarly, recreational all-terrain vehicles have the potential to generate noise that impacts lands far beyond the M parcels.

In closing, the Nation requests that the M parcels not be used for motorized recreational vehicles or a shooting range and that no Special Use Zones are established on WDNR lands associated with the Badger parcel. Future land use and management of the property should focus on conservation with opportunities for low impact recreation. This approach is best outlined in the BOMC Planning and Land-use document known as "Alternative 4". This alternative is most consistent with our mission for Badger and the values held by the Nation.

Thank you for the opportunity to comment on the Draft Conceptual Alternatives.

Sincerely

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President of the Ho-Chunk Nation