



WISCONSIN WILDLIFE FEDERATION

MACKENZIE ENVIRONMENTAL CENTER

W7303 COUNTY RD CS & Q, POYNETTE, WI 53955 • (608) 635-2742 • (800) 897-4161
www.wiwf.org

AFFILIATED WITH THE NATIONAL WILDLIFE FEDERATION

President:

Chuck Matyska
5055 County V
Cecil, WI 54111
715-745-6382

mmatyska@yahoo.com

March 8, 2013

First Vice President:

John Wagner
722 A S. Silver Lake St.
Oconomowoc, WI 53066
262-560-1230

ext2022@sbcglobal.net

Mr. Mark Aquino

Wisconsin Department of Natural Resources
3911 Fish Hatchery Road
Madison, WI 53711

RE: Optimizing Cleanup and Restoration for Future Land Use at the BAAP Settling Ponds Area in the Sauk Prairie Recreation Area

Second Vice President:

George Borchert
7420 South Hwy 45
Oshkosh, WI 54902
920-688-3122

geo44@charter.net

Dear Mr. Aquino:

The Wisconsin Wildlife Federation is writing to ask that the Department reject the current Alternative Feasibility Study proposal submitted by the Army for the settling ponds site. We would like to see a new proposal from the Army that contains soil remedial goals which will achieve a level of cleanup at the Settling Ponds site that will be safe for recreational uses such as, but not limited to: hunting, trapping, wetland restoration (flora and fauna), bird watching, education, research, photography, and hiking. The disturbance of vegetative cover and soil from all of these activities is more than likely. Restricting use of these lands for these activities is just not acceptable.

Treasurer:

Pat Ramirez
3696 Blueberry Lane
Waldo, WI 53093
920-838-1266

Pmramirez05@yahoo.com

To fully assess public interest in Sauk Prairie Recreation Area lands, including the Settling Pond area lands, we ask that the public comment period remain open until such time as future land use is decided through the DNR'S Master Planning Process. A pre-determination by DNR that soil safety standards can be lowered to a point that is acceptable for one possible public use, a shooting range for example, but unacceptable for other possible public recreational uses **prior to** the completion of the Master Planning process is unacceptable. The soil safety standards should be high enough to allow just about any public use of the land. Due to the high water table in the area the remaining soil depth is very shallow and should not be a problem for the Army to remove. Residual soil contaminants include lead, explosives, chromium and other environmental toxins that should be removed for public safety.

Secretary:

Carolyn Brown
8131 N Oak Ridge Drive
Milton, WI 53563
608-868-2514
brownc@centurytel.net

Past President:

Jack Nissen
1811 W. Ottawa Ave.
Dousman, WI 53118
262-370-8154

countyhighway@yahoo.com

Executive Director:

George Meyer
201 Randolph Drive
Madison, WI 53717
608-516-5545

georgemeyer@tds.net

Please be advised that the Federation is particularly concerned about the excavation and destruction of wetlands by the Army without a Clean Water Act 404 Permit and without complying with DNR NR103 regulations. Attached are maps of the area prior to the Army's use of the land and they clearly show wetlands to be present. An obvious first step that should have been taken by the Army is to delineate the wetlands, however, the Federation has been told that the wetlands in the Settling Ponds area were never delineated as required under these regulations. The presence of hydric soils, wetland vegetation and a nearby major riverine system are just three wetland functional values that are present in these lands. Further examination would have uncovered others. For example, a study of amphibians that would be impacted by the construction of the Settling Ponds and Soil Disposal Areas was not completed by the Army. The delineation recently conducted by DNR was accomplished after excavation and reportedly in the middle of winter with more than a foot of snow on the ground. We do not consider this delineation to be accurate or acceptable under these conditions. Certainly, no amphibians were discovered in this delineation.

Business Manager:

Jennifer Evans
W2516 Kuehn Road
Cambria, WI 53923
608-635-2742

jennifer@wiwf.org

Wetland restoration in the Settling Ponds area should be a top priority for the Army and the DNR. The work plan should include restoration of hydric soils, vegetative cover indicative of a meadow wetland and restoration of the hydrology in the area including Final Creek. Susan M. Galatowitsch, Ph.D. (Professor, Restoration Ecology, Department of Horticultural Science, University of Minnesota, St. Paul MN) commenting on wetland restoration practices recently said: *“Plant communities influence nutrient cycling and food webs, provide food and habitat structure to animals, and contribute to a wetland ecosystem’s aesthetic appeal. Consequently, the restoration of a wetland’s plant communities is often considered crucial to project success.”*

The Federation sees no viable reason why public safety standards acceptable for the majority of the Badger property cannot be applied for the Settling Ponds area. The threshold for lead in soils at the Settling Ponds, for example, is set at the equivalent of the **industrial** standard or 500 mg/kg, whereas lead cleanup has been less than 250 mg/kg for the balance of the Badger property. The Department’s stated intent is to accept and approve a soil remediation goal of 500 mg/kg for lead is found in its February 7, 2013 Preliminary Determination of Feasibility for an Alternative Remedial Action for Soil of Final Creek, the Settling Ponds, and Spoils Disposal Areas of the Badger Army Ammunition Plant.

This needs to be changed to the 250 mg/kg standard to allow recreational use of the land.

We are looking forward to the DNR setting the highest standards possible for public use of the lands at the Sauk Prairie Recreation Area. Why would the people of Wisconsin want anything else? Why should DNR want anything else?

Thank you for your consideration of our requests and concerns.

Sincerely,

George Meyer
Executive Director
Wisconsin Wildlife Federation

Don Hammes, Wetlands Committee
Director, District #7
Wisconsin Wildlife Federation

Cc: Will Myers, Wisconsin Department of Natural Resources
Elyse LaForest, National Park Service
Senator Tammy Baldwin

Attachments (2)