



June 8, 2016

Elyse LaForest
National Park Service
15 State Street
Boston MA 02109-3572

Subject: NPS comments on the Sauk Prairie Recreation Area draft master plan

Dear Ms. LaForest:

Thank you for your May 3, 2016 letter regarding the draft master plan and environmental impact statement for the Sauk Prairie Recreation Area (SPRA). Thanks also for your recent phone conversation with John Pohlman clarifying some of your comments and perspectives.

Some of the issues you raised duplicate what the department heard from the public during the open comment period that ran from August 11 to September 25, 2015. Over the past months we have been revising the draft master plan and environmental impact statement based on these comments. We will continue reviewing your comments and incorporate additional modifications to the draft plan as appropriate. We anticipate presenting the revised document to the Wisconsin Natural Resources Board in the next few months.

The Department of Natural Resources (DNR) has a robust process described in Wisconsin Administrative Code chapter NR 44 to determine appropriate recreational uses and habitat management actions at its properties. We also have a thorough process to assess the impacts, both positive and negative, that may result from the use and management of these places (ch. NR 150, Wis. Adm. Code). Based on your and the public's input, I believe that the revised master plan and environmental impact statement will adequately describe the intended management and use of the property and the potential impacts of that use. If, after reviewing the revised document, you believe further analysis would be beneficial to meet federal needs, the National Park Service (NPS) is of course free to conduct additional data gathering and evaluation.

You raised a few concerns that I'd like to specifically address:

Proposed recreational uses not in the DNR application or POU

Your letter stated that the proposed master plan included several uses that were not in the original application and program of utilization (POU). However, the POU didn't definitively include *any* specific suite of uses. The POU stated that the DNR would go through its standard property planning process (ch. NR 44, Wis. Adm. Code) to determine appropriate recreation activities and habitat management strategies. *See e.g.*, DNR's Application to Acquire Surplus Federal Property dated December 1, 2004, Part B sections 2. a) Team Approach to Master Planning and Collaborative Work With Partners ("The specifics for how the property will be developed and managed will come from a master planning process the WDNR is required to prepare.") and b) Schedule of Development ("The WDNR is required to prepare a master plan for all major properties. The master plan will define appropriate land uses (recreational, habitat restoration) and identify development

projects necessary to support the approved uses and evaluate social, environmental and economic impacts of implementing the plan.”). The NPS recognized this fact, and the fact that recreational uses other than the ones specifically listed as example uses might exist on the property. *See e.g.*, National Park Service Report and Recommendation on the Application of State of Wisconsin, Department of Natural Resources to acquire Surplus Federal Property known as the Badger Army Ammunition Plant, section IV. The POU did not list the recreation opportunities that would be provided at the property because they were not known when the DNR submitted its application.

The DNR’s application stated a general intent to manage the property for low impact recreation and listed some activities as examples of recreation opportunities that the department expected might come out of the planning process. These included hiking, picnicking, primitive camping, Lake Wisconsin access, and education and interpretation opportunities. There was no specific mention of many activities that occur at department properties throughout the state, such as bird watching, hunting, fishing, biking, horseback riding, trapping, nature photography, dog training, snowmobiling, cross country skiing, berry picking, and hosting special events. Further, there was no mention in the POU of habitat management techniques or strategies that would be used to achieve desired goals.

After following its standard property planning process, the DNR developed an initial draft property plan that included many outdoor recreation activities common to DNR properties as well as two – rocketry and dual-sport motorcycles – that are uncommon. After considering input from the public on the initial draft master plan, the DNR is clarifying the conditions and guidelines for several of the recreation activities proposed at SPRA (including rocketry and dual-sport motorcycle use). The DNR believes that the collection of recreation opportunities proposed for SPRA, and the parameters by which they can occur, meets the intent of using the property for low impact recreation.

Meeting the intent of the POU

The master plan provides considerable detail on the recreation opportunities that will be provided at SPRA and the management actions and strategies the DNR will utilize to achieve desired habitat outcomes. Because the overall use and management of the property will be low impact and the habitats restored and managed will focus on grasslands and savannas, the core property goals of the original POU remain unchanged. The master plan does not deviate from the DNR’s application to receive the property through the Federal Lands to Parks program. As such, there is not a need to amend or change the POU.

Alternative management scenarios

Your letter stated a desire for the DNR to develop an alternative management proposal comprised just of the activities and actions included in the DNR’s application and POU. As noted earlier, the POU stated that the specific activities allowed at the property would be determined through the master planning process. As a result, there is not a list of activities from which to construct such an alternative. An EIS that was completed in March 2003 for the disposal of the Badger Army Ammunition Plant similarly does not include a specific list of recreational uses.

We are maintaining the “no action” alternative, not because it is a desirable alternative but rather because it is a reasonable one for the DNR, the Natural Resources Board, and the public to consider given limited budget and staffing resources. We will add language clarifying that this alternative would likely lead the NPS to consider the property to be in noncompliance with the DNR’s original justification for obtaining the property and would potentially put the SPRA in jeopardy of reversion to the federal government.

Potential conflicts between recreation uses

As you stated in your letter, the DNR is tasked with determining how to use and manage the property. Each property is unique in terms of ecological, social, institutional, or economic attributes; together, these influence the recreational demands and habitat needs that the property may be well suited to provide. We recognize that a few of the proposed recreational uses are opposed by people who commented on the draft plan, but the DNR's goal and responsibility is to provide the full range of outdoor experiences on our portfolio of properties.

Similarly, we do not seek to maximize the number of people on a property in general and certainly not each day. The DNR has long held that it is acceptable to include activities at properties (permanently or temporarily) even if they may displace other visitors. Some DNR properties have more intensive uses (year-round or occasionally) while others only provide for less intensive uses. The DNR owns more land and public access easements in Sauk County than any other county in southern Wisconsin (over 30,000 acres); the vast majority of these lands only provide opportunities for low intensity activities. There is not a shortage of opportunities in Sauk County for people to enjoy low intensity, quiet, or remote experiences on lands open to the public.

Impacts of recreational uses

One of the comments we received from the public was a desire to see additional information describing the potential impacts associated with different recreation activities, particularly those which can generate more noticeable impacts. You recommended a similar revision. We have updated part of the impact analysis section of the document to reflect this. As you know, only limited research has been conducted on the impacts of different recreation activities on habitats, species, and other property visitors. DNR staff have incorporated this information, along with their professional expertise, to assess potential impacts of proposed activities and actions. If NPS or others have data that indicate specific outcomes resulting from the proposed recreational uses at SPRA we would be very interested to review them.

Potential shooting range

In your letter you stated that if the DNR does not include a shooting range in the proposed master plan, then the DNR should wait until the master plan review cycle (15 years) is over before requesting a change to the POU that would allow a shooting range. The DNR does not take steps that preclude the authority of future administrations or the Natural Resources Board from making decisions related to property management and use.

Our policy is to minimize variances and amendments to existing property master plans to the degree feasible, but in instances when conditions, needs, or opportunities change we recognize that modifications to master plans are sometimes necessary. If, in the ensuing 15 years, the DNR determines that adding or removing uses from the property is warranted, it will go through the process outlined in ch. NR 44, Wis. Adm. Code, to seek a change to the master plan. That process evaluates needs, opportunities, and impacts and includes opportunities for public input. We will, of course, also notify you so that the NPS can conduct any additional analysis it deems necessary.

Non-metallic mining, farming and forestry activities, and easements

Thank you for bringing to our attention that the deeds restrict the department's ability to allow town, county or state agencies to use non-metallic materials (sand, gravel, dirt or fill material) not related to the use and development of the SPRA. Thanks also for reiterating the requirements related to farming and forestry

activities as well as easements and concession agreements. We will clarify the language in these sections appropriately.

Thank you again for the time and effort you and others at NPS invested over the last seven months in reviewing the draft master plan and environmental impact statement for the Sauk Prairie Recreation Area. Many of the issues you raise re-inforce the messages we heard from the public and are helpful in improving the document. We expect to finish revising the final draft master plan and final environmental impact statement soon and forward it to the Natural Resources Board for their consideration. We will send you a copy as well.

Sincerely,

A handwritten signature in black ink, appearing to read "Sanjay Olson". The signature is fluid and cursive, with the first name "Sanjay" written in a larger, more prominent script than the last name "Olson".

Sanjay B. Olson
Administrator, Division of Fish, Wildlife, and Parks