



Madison Parks Division

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March 18, 2021

To: Board of Park Commissioners

From: Eric Knepp, Parks Superintendent

Cc: Bill Quackenbush, THPO, Ho-Chunk Nation
Mayor Rhodes-Conway
Alder Tag Evers
Amy L. Rosebrough, Wisconsin State Historic Preservation Office
Heather Bailey, Preservation Planner

Re: Vilas Park Master Plan – Cultural Resources

The Board of Park Commissioners adopted a new Vilas Park Master Plan at its March meeting. This plan is conceptual in nature and sets the vision for future additional planning and development work based on the availability of budgetary resources allocated and prioritized by the Common Council. As the Commission heard at the meeting, there are members of the public who are concerned about the implications of the Plan on historic cultural resources within the Park. I share the concern of protecting these resources and look forward to future detailed design and development planning that will both allow improvements to occur at Vilas Park and protects the historic cultural resources in the Park.

At the March meeting, Parks staff, including me, erroneously indicated that a complete Phase 1 Archeological Survey had been completed for the Park. In fact, the work that has been performed to date on the plan was a literature review and did not include field work. I regret this error occurred and have reviewed how it happened with staff. We are taking appropriate action to correct it from happening again in the future. It is important to note that this was not a departure from any regulatory or policy framework that establishes field testing prior to conceptual master planning. This conversation occurring now is leading us to consider improvements in this area. I do not think, however, that the communication error or absence of a Phase 1 survey creates a significant material weakness in the Adopted Master Plan or its future implementation. There are multiple steps, reviews, and processes that will protect the cultural resources in future project work. The most important among those is the staff awareness of the scope of the issue and our commitment to conducting a Phase 1 Archeological Survey prior to additional design development work. We will also ensure this memo is retained and included with the Master Plan work. In addition to the full Phase 1 survey work, staff are obligated to follow all legal and permitting processes that exist at the time of the project. This includes authorization from the Wisconsin State Historical Society for any ground disturbance within any mapped boundaries of an archaeological site.

The Parks Division takes seriously its role and responsibility in protecting historic cultural resources within the Parks system. As most Commissioners will recall, in 2019 the Commission approved an updated Burial Mound Policy for the Parks system. The work to create that policy included efforts of multiple parks staff who worked diligently to engage with and incorporate the suggestions of the Ho-Chunk Nation. This work prioritized and centered the Policy on preservation of the burial mounds. We will continue to work with the Ho-Chunk Nation to engage on improvements to how we protect, conserve, maintain, and celebrate the cultural assets across the system. This will include direct early engagement with the Ho-Chunk Nation's Department of Heritage Preservation for all capital projects planned at Vilas Park. This engagement will occur prior to public engagement regarding a project plan to ensure that the Nation's voice is heard clearly and is given priority in determining the course of the project. I do think it is important to note here that establishing a formal review process in such matters is a shift of obligation from the City to the Nation. I feel strongly that this process should be built from a place of understanding that the Ho-Chunk will be notified of our plans and they decide if and to what extent they wish to engage.

The Parks Division will also be engaging with the State Historic Preservation Office to develop additional knowledge of best practices and work to implement process improvements to develop a more systematic approach to our obligations as stewards of many historical cultural resource sites. I am confident that this engagement will lead to improvements in our existing processes and will raise knowledge and awareness of best practices within the dedicated Parks staff team.

There has been some interest from members of the public to have the Board reconsider the Adoption of the plan and modify it in some manner. Though I appreciate these concerns, I think the Master Plan itself need not be amended to execute the work outlined above that staff is committed to doing. There are still multiple additional steps for staff to be accountable for the work being completed, including future public engagement meetings for design development as well as future budget allocation decisions made by Common Council. If any Commissioner would like to discuss this further, please feel free to reach out to me directly and I will ensure staff will work to provide any additional information needed.