

Good evening, members of the Primrose Township Board, fellow residents, and non-residents.

My name is Bradley Clerkin. My family and I moved to Primrose to establish a small farm and raise our children in this community. As an avid waterfowl hunter and gun owner, I deeply appreciate firearm-related traditions and rights. Our property is right next to the gun club. When we bought our land, I was genuinely enthusiastic about having what I believed to be a conservation club as a neighbor, one that occasionally engaged in weekend trap shooting. However, it's become apparent that we have a gun club looking to become a commercial trap shooting and event space next door, not the conservation-oriented club I initially imagined. Though I enjoy hunting and respect gun ownership, I'm here to voice my concerns about the club leadership's current direction and potential impact on our township.

In many ways, our recent community election was a referendum on the town's land use plan. The incumbents, whom many of us supported, championed this plan, emphasizing the preservation of Primrose's unique essence. Their victory signals our collective commitment to this vision. It's a testament to the community's values that the members who believe in the town plan triumphed, indicating our collective commitment to safeguarding Primrose's identity.

Yet, it seems the gun club's current trajectory threatens to undermine the very principles we've championed.

1. The town's land use plan explicitly aims to "preserve the productive farmlands" and "maintain the rural character of the town." The club's push towards commercialization, without adequate oversight, could erode this rural character and impact surrounding farmlands productivity.
2. The plan emphasizes the preservation of "farmland, woodlands, wetlands, wildlife habitat, streams, open space, historic resources, scenic views, hills, and bluffs." The unchecked depositing of lead and coal tar from the club's activities directly threatens these natural resources.
3. The town's vision for transportation emphasizes safety, efficiency, and planning for anticipated traffic demand. The club's expansion, particularly its transformation into a commercial event space, could, and in the past already has, strained our transportation infrastructure, causing unanticipated traffic and safety challenges on Miller Rd and surrounding areas.
4. Furthermore, the town's economic development goals focus on home-based, independent contractor, and limited family businesses with minimal to no impact on agricultural activities and the town's rural character. The club's commercial ambitions seem starkly at odds with these guidelines.

Additionally, club leadership does not seem to feel that the town board or the neighbors' concerns over oversight matter. For context, I'd like to read an email circulated by Mr. James Royea to Deer Creek members last week:

From: "James Royea" <jroyea@gmail.com>  
To: Deer Creek Members  
Sent: Tue, Sep 12, 2023 at 2:18 PM  
Subject: Primrose planning meeting for our rezone petition  
Hello Deer Creek members and friends.

It looks like the neighbors want to put up a big fight over our proposed rezone and CUP request. I'm not sure why they feel that fighting it will help them but at this point it doesn't matter. What I would like from you is a show of support at the meeting this Monday at 7:30 PM at the Primrose town hall. I don't think we will need to have people come up and speak (unless you want to). I think just having a majority of people there showing support will go a long way in convincing the planning commission to move forward.

So if you have some free time on Monday night and would be able to stop by, that would be great.

Thank you,  
-Jamie

This email's tone suggests a dismissive attitude towards the concerns of neighbors and the township. I, for one, very much feel that the township board and the neighbors' concerns do indeed "matter." It also suggests they prefer to try and strong-arm the neighbors and the board instead of doing the work to build a comprehensive plan for lead and coal tar management. It's worth noting that most of the club members are not residents of Primrose, yet their activities directly impact our community. It's disheartening to note that on numerous occasions, the club leadership has purported to have our support, portraying a narrative that neighbors align with their decisions. This is false. Many of us have communicated our concerns with clarity. Often, our feedback has been met with a brief, confrontational response, followed by unsettling silence. The leadership then presents updated plans that appear to sidestep our feedback while simultaneously claiming we are on board. This misrepresentation is further perpetuated in interactions with entities like Dane County, where we are painted as obstructionists.

A correspondence between Mr. Ray and I that perfectly encapsulates this situation. In email, I took the time to craft clear and concise feedback regarding how the club articulated, in a CUP draft, their plan to manage the lead problem. To my dismay, my concerns were initially dismissed, and then, silence ensued. Despite my genuine attempts to engage constructively, I

have yet to receive any further communication from him. I know most of the neighbors here have shared similar experiences. My feedback focused on the following be added to the CUP:

- A comprehensive plan detailing lead clean-up methods, criteria, tests, and disclosure of results.
- Transparent methods to finance these clean-up activities and the associated reporting mechanisms.
- Strategic interventions to address the coal tar dilemma, with a suggestion to explore environmentally friendly clay targets.

I also underscored the importance of specificity. Ambiguous phrases like "cost-effective", which are open to interpretation, should be given clear, actionable definitions to prevent miscommunication and potential disagreements. My concerns went unanswered, and the club's current proposal seems to have sidestepped the feedback I provided. An example of sidestepping is instead of giving clear procedural and financial guidelines in replacement for the word "cost-effective," they had someone create a statement that reads like the small print on a prescription drug commercial:

"When lead concentrations reach minimum levels necessary for the value of the recycled material to pay for commercial reclamation services, the club shall cause such reclamation to be conducted. The club shall also cause such reclamation to be conducted if required by state or federal law. "

This attempts to circumvent my feedback and make it a big grey area regarding clean-up. It's the exact opposite of what I was requesting. Something written this way (and the entire CUP is full of similar statements) creates even more ambiguity and unease. We want them to have a viable, detailed, and well-funded plan for future lead and coal tar clean-up. Instead, what was added just raises further questions.

- Are we now saying that if there is lead contamination or we exceed the limit from the EPA, for the clean-up to happen, a commercial entity needs to be willing to do it for free because of the value of the lead?
- What happens if lead values shift, and that never happens?
- What if you only get one quote, and that quote is higher than others?
- What is the likelihood such a service exists?

Much of the CUP causes anyone with a reasonable level of concern and skepticism to take significant issues with the current specificity in the CUP and how the current club operates.

Such experiences underscore the narrative that the club leadership seems more interested in broadcasting an appearance of harmony and agreement with neighbors rather than genuinely seeking it.

Beyond the evident farmland and watershed impact concerns, property values loom large. The mere association with lead contamination can have dire consequences. Flint, Michigan, serves as a cautionary tale. After their lead crisis, Flint's real estate values plummeted. While our situation differs, the mere whisper of "lead" in headlines can spell disaster for property values.

I would also like to highlight the general risk to the township itself. If, for some reason, the club were to close or find itself unable to manage the clean-up of lead and other contaminants, who would shoulder the burden? The immediate assumption might be the club itself. Still, considering the possible long-term environmental impacts and the associated high costs of remediation, the responsibility could likely fall upon the township and county.

As a resident, I am compelled to hold both the township and the county accountable, especially if the CUP is approved in its current form. The potential financial burden on the township and county could be substantial even with modifications. It's not just about the immediate costs of clean-up; it's also about the potential legal ramifications, decreased property values, health-related issues, and the immeasurable damage to our community's reputation.

Lastly, the club should be a positive addition to the Primrose community. As previously mentioned, many club members are not Primrose residents. If we are to embrace the club's presence, especially when it seems to challenge our land use plan, the club must bring tangible benefits to our community. Hosting hunter safety courses and Boy Scout meetings are commendable efforts, but they primarily rely on the club's facility rather than active participation from its members. Simply offering space to select groups differs from actively engaging with and significantly contributing to the local community. The conservation club's original goals seemed to reflect these ideals, but the current direction suggests a shift towards prioritizing more significant shooting events and commercial hosting. This board needs to provide guidance, ensuring that the club and its members and serves as a genuine asset to the Primrose community, especially considering the considerable risk the club's activities present to the land and neighbors.

We must ensure that any decision made today is manageable for the township, county, and its residents in the future.

While the club may perceive my stance as opposition for opposition's sake, this is far from the truth. My concerns stem from genuine love and commitment to Primrose and its future.

In closing, I urge the board to:

1. Reevaluate if a gun club's potential lead and coal tar accrual aligns with the Primrose land use blueprint.
2. Require the club to increase its conservation activities, ensuring their presence is a net benefit to neighbors and Primrose at large. (Think friends of Donald Park)

3. Require the club to have clear, explicit, well-defined, and rigorous lead and coal tar management protocols for the health and safety of residents and to protect the value of properties, the watershed, and the farmland.
4. Reconsider the club's proposed evolution into a commercial event space, given its misalignment with the land-use goals.
5. Protect Primrose and its residence from significant financial and reputation risk with a strategy such as requiring the club to hold some insurance bond for lead and coal tar clean-up

Thank you for your time and consideration. I trust in the board's unwavering commitment to the values and future of Primrose.