

September 25, 2015

Bill Clark  
Environmental Review Supervisor  
DNR Service Center  
810 W. Maple Street  
Spooner, WI 54801  
[DNRBadgerwoodProposal@wisconsin.gov](mailto:DNRBadgerwoodProposal@wisconsin.gov)

RE: Badgerwood LLC EIS

Dear Mr. Clark:

The League of Women Voters of Ashland & Bayfield Counties was very pleased to learn that DNR has decided to prepare an EIS as part of its review of Reicks Farms' application for a WPDES permit to construct and operate a large Concentrated Animal Feeding Operation in Bayfield County. As we indicated when we wrote last February to request that an EIS be done, this will give the Department and other decision-makers and members of the public complete information on this proposal and allow the interested public to fully consider, participate in and comment on the short and long-term impacts of the proposal on the quality of the human and natural environments in Bayfield County.

We understand, from the draft outline, that the Department plans to address a multitude of potential impacts, including those to air quality, groundwater resources, aquatic and upland wildlife and habitat, wild rice and other tribal resources, human health, tourism, economic development, property values, traffic, noise, odors, aesthetic resources and recreation areas. These are all extremely important concerns, and we are glad to see that they will be addressed. By far the greatest concern, however, is the potential for surface water degradation, i.e., the Fish Creek and White River watersheds and, of course, Chequamegon Bay and Lake Superior, into which they flow.

The Fish Creek and White River watersheds contain Exceptional and/or Outstanding Resource Waters, and Lake Superior, as you well know, contains 10% of the world's fresh water.

*The Right to Vote is Not About Politics or The Outcome of Elections; It is About Equality and Justice*

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With increasing threats to other drinking water supplies in Wisconsin, the Midwest, the nation and the world, it is more imperative than ever that we do everything we can to protect the remaining sources of fresh water, indeed, the League believes that we have a moral obligation to do so. The LWV Water Position states that:

Maintaining access to clean water which supports life and a healthy environment is a public trust, a fundamental human right, and is the shared responsibility of all who live or do business in Wisconsin. Managing water as a natural resource is essential to maintaining our quality of life, as well as to ensuring its availability to support the mix of natural flora and fauna which is unique to our state. Decisions about water use and management must be made with consideration for public safety and the impact those decisions will have on all current and future generations of stakeholders.

As we noted in a letter to you earlier this year, Lake Superior is the source of drinking water for, among others, the City of Ashland, whose water intake is perilously close to the outlet for the Fish Creek watershed, where Badgerwood would store and spread the millions of gallons of manure produced at the facility. The Badgerwood facility is proposed at a location that has, according to USDA's Web Soil Survey, very limited capacity for manure storage and application. Contamination of nearby waterways with nitrates, E. coli, Salmonella and other pollutants, via runoff and spills, seems unavoidable. For this reason we urge you to pay particular attention to surface water impacts in compiling information for this EIS.

Water pollution is, however and unfortunately, not the only grave concern. Also of public health concern is the potential for spreading Porcine Epidemic Diarrhea (PED), an incurable virus that has not yet been found in northern Wisconsin. We hope the EIS will help assess this threat to public health. In addition, the EIS should, as we noted in our previous correspondence, assess the extent to which the Badgerwood operation would negatively impact tourist mainstays and the jobs that depend on them, including Bayfield County's fruit farms and its six nationally designated public use areas--more than any other single place in the State of Wisconsin. These public use areas—the Apostle Islands National Lakeshore, the Chequamegon-Nicolet National Forest, the Iron River National Fish Hatchery, the North Country National Scenic Trail, the St. Croix national Scenic Riverway and Whittlesey Creek National Wildlife Refuge, have been preserved for the enjoyment of all Americans because of their incredible natural history and

scenic splendor, critical ecological diversity and historical importance that makes them unique and special to all Americans, not just those residing in Bayfield County, or even the State of Wisconsin. Additionally, there are numerous other county and state public use areas in close proximity to the proposed site, including public beaches, parks, and forests, etc.

We hope that the Badgerwood CAFO EIS will provide critical details about this facility that are currently lacking, including maps, diagrams, nutrient management plans, a list of state, federal and tribal permits, impacts on threatened and endangered species, impacts on water resources, and a list of reasonable alternatives to the proposed project, including options that might avoid its potential adverse environmental effects and, of course, a “no action” alternative. The Badgerwood facility would be the first CAFO in the Lake Superior Basin and as such, poses unique and frightening risks to this most valuable freshwater resource. While we understand that the Department would, were it to issue a permit for this facility, require state-of-the-art manure management practices, water pollution seems inevitable. Meteorological data show that the area experiences episodes of intense rainfall, occurrences which force more pollutants into nearby waterways. Lake Superior is a priceless and irreplaceable resource, and we cannot do too much to protect it.

Sincerely,

Madelaine Herder

President

League of Women Voters of

Ashland and Bayfield Counties