



PLANNING AND ZONING DEPARTMENT

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RE: Comment on Gordondale Farms, Inc
WPDES Permit No WI-0062359-03-0

The Portage County Planning and Zoning Department and Portage County Health and Human Services Department respectfully submit the following comments regarding the Wisconsin Department of Natural Resources proposed reissuance of Gordondale Farms, Inc Wisconsin Pollution Discharge Elimination System (WPDES) Permit.

Gordondale Farms, Inc is currently the largest farm with the largest number of concentrated animal units in Portage County. According to the WPDES Permit Fact Sheet, Gordondale Farms is also seeking to potentially expand its number of animal units housed in the permitted facilities.

These facilities are located in close proximity to a higher density of residential drinking water wells in the incorporated Village of Nelsonville and to both groundwater and surface water resources (the Tomorrow/Waupaca River and Gordondale Creek a tributary to the Tomorrow Waupaca River).

Due to this proximity, we are writing to ask the DNR to include a routine visual inspection of the four concrete lined manure storage facilities listed in the WPDES permit to be completed by the producer on a regular basis, and to require groundwater monitoring wells in the vicinity of the manure storage facilities on the home farm and Deere Ridge Farm locations.

Visual inspections of the concrete lined manure storage facilities provide a measure of reassurance that the facilities are functioning correctly and pose no potential threat of failure or harm to natural resources. We would also request that the reports of these visual inspections are made available to the public.

The manure storage facilities located on the "home farm" site sit between two surface water bodies (the Tomorrow/Waupaca River and Gordondale Creek, a tributary to the river), and lie on soils (Rosholt and Billit soil series) that have marginal abilities to attenuate any potential contamination according to the Wisconsin Geological and Natural History Survey and University of Wisconsin Extension. This site also has a relatively shallow depth to groundwater of 20-30 feet and groundwater flows from the northeast to the southwest towards the confluence of the Tomorrow/Waupaca River and

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Gordondale Creek. These facilities are also located within the incorporated boundaries of the Village of Nelsonville and are approximately 1,000 feet from Gordondale Creek and the beginning of downstream residential wells within the Village.

The manure storage facilities located on the Deere Ridge Farm, while farther away from the Village of Nelsonville (approximately 4,000 feet), still lie on soils (Billet and Wyocena Soil Series) that are categorized as having marginal abilities for attenuation of potential soil contamination. Groundwater flow direction is also from the north east to the south west in this location. However, groundwater in this location is flowing directly toward a denser concentration of private drinking water wells within the Village of Nelsonville.

Wisconsin State statute NR243.15 (7) allows the Wisconsin DNR to "require the installation of groundwater monitoring wells in the vicinity of manure storage facilities, runoff control systems, permanent spray irrigation systems and other treatment systems where the department determines monitoring is necessary to evaluate impacts to groundwater and geologic or construction conditions warrant monitoring". We request that any required groundwater monitoring system follow the requirements outlined in state statute NR 214.21, including monitoring wells both up gradient and down gradient of the facilities identified above.

Due to the soils at these sites, the proximity to surface water bodies, shallow groundwater resources and locations either within or close to the boundary of the Village of Nelsonville we felt that groundwater monitoring of the manure storage facilities located at both the home farm and Deer Ridge Dairy sites are an appropriate measure. Establishing these monitoring wells and program now will allow for the establishment of baseline water quality data prior to any potential expansion slated to occur by 2020. This will also provide further reassurance that this facility is not having a detrimental impact on groundwater resources and that if something were to change, measures are in place that would provide a level of detection.

Thank you for your strong consideration of this request.

Sincerely,



Jennifer L. McNelly
Portage County
Water Resource Specialist



Gary Garske
Portage County
Health Division Coordinator/Health Officer