



**KEEPING THE
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September 12, 2008

Rodney J. Nilsestuen, Secretary
Wisconsin Department of Agriculture,
Trade and Consumer Protection
P.O. Box 8911
Madison, WI 53708-8911

Matthew J. Frank, Secretary
Wisconsin Department of
Natural Resources
P.O. Box 7921
Madison, WI 53707-7921

Re: Karst Mapping Pilot Study for Calumet County, Wisconsin

Dear Secretaries Nilsestuen and Frank:

Earlier this spring, you received a letter from UW Cooperative Extension Interim Dean Richard Klemme enclosing an April 4, 2008 memorandum from ten UW Extension System researchers making certain recommendations with respect to shallow carbonate bedrock areas of the state. The memorandum was authored in partial response to the Final Report of the Northeast Wisconsin Karst Task Force (February, 2007) (the "Karst Report"). The memorandum noted that the Karst Report, while bringing attention to this important topic, was focused on only one part of the state and "... by itself it is neither a statewide assessment of problems nor should all recommendations be deemed appropriate in all settings." The memorandum also indicated that the Karst Report was "not intended as the basis for widespread regulatory actions, nor the incorporation into state administrative rules." Lastly, the memorandum also encouraged the formation of a "Statewide Wisconsin Carbonate Bedrock Task Force."

On behalf of the Dairy Business Association, the purpose of this letter is to indicate our support for a Discovery Farms-initiated pilot mapping study in Calumet County designed to better understand where karst geologic formations are located in Wisconsin and how best to reduce groundwater impacts in those sensitive areas from a variety of sources, including, but not limited to, agriculture. This project is described in the attached article authored by UW-Discovery Farms co-director, Dennis Frame. We believe this pilot program will provide more directly applicable and usable tools for land managers than would the results of a protracted "Task Force". Indeed, such a pilot study would build on the recommendations of your joint agency Manure Management Task Force's Final Report (March, 2006).

While the goal of the formation of the task force may be laudable, we believe that a more practical and effective solution would be to provide property owners with a mapping tool that they can use to identify sensitive areas and alter land management practices accordingly. Indeed, this recommendation is consistent with that offered by the attached UW Discovery Farms document titled "Review and Comment on the NE Wisconsin Karst Task Force Report" (December, 2007), authored by Dr. Frame and Dr. Madison, co-directors of the UW Discovery Farms Program. UW Discovery Farms suggests "... that a mapping program which identifies the thicknesses and distribution of soils and unlithified materials at scales appropriate for agricultural producers be developed."

As you may know, the agriculture production industry in Wisconsin remains concerned about several aspects of the Karst Report. Specifically and most importantly, the Report focuses solely on impacts from livestock manure while ignoring all other sources of nutrient contaminants to groundwater. In addition, Table 1 on page 7 of the Report provides specific levels of protection required for activities that take place on land with specific soil depths to groundwater. We believe this table is oversimplified and that there is not enough information available to apply the proposed levels of protection to existing land uses. The UW-Extension Discovery Farms Review and Comment on the Report (Discovery Farms Review) noted many of these same concerns.

We believe that, in order to begin effectively reducing groundwater impacts in sensitive geological areas, more data needs to be collected on nutrient input sources and specific locations of sensitive geological areas. The Discovery Farms Review recommended developing a mapping program to identify thickness and distribution of soils throughout Wisconsin. We agree with this recommendation and believe that a comprehensive soil thickness map of Wisconsin will be invaluable as the agriculture industry works to reduce impacts to groundwater in Wisconsin. This comprehensive map, coupled with a groundwater impact analysis that includes all sources of nutrient input into the groundwater, will provide a sound basis upon which to develop effective problem-solving strategies and land management practices/policies for contaminant sources to reduce groundwater impacts in sensitive areas.

As noted above, your agencies have collaborated previously (and recently) to develop the findings and recommendations of the Joint Agency Manure Management Task Force delivered on March 1, 2006. The formation of yet another task force would seem to duplicate the work previously completed; rather, we recommend an adaptive management approach utilizing the Calumet County mapping pilot project and assert that this approach is entirely consistent with one of several recommendations advanced by the previously constituted Joint Agency Manure Management Task Force. The method for delivery of the information concerning the development of practices and the deployment of the mapping tool could be accomplished through the "interested persons group" (IPG) formed pursuant to DBA's Green Tier Charter signed last fall with WDNR. Further information concerning the IPG is in the enclosed memorandum.

The most beneficial way to implement such a program is to start with a pilot program in one county and assess the cost and value of that program as data is collected and impact analyses are completed. We therefore formally request that Discovery Farms undertake such a pilot program in Calumet County. As noted in the Discovery Farms Review, the Wisconsin Geological and Natural History Survey (WGNHS) is best situated to lead such a program, as it is already involved in similar work related to the movement of arsenic in karst formations.

The proposed pilot program would include comprehensive geologic mapping and a comprehensive nutrient input analysis (all sources) for Calumet County. The goal of the pilot program would be to develop high-quality soil thickness maps, identify the sources and amounts of manure, septage, commercial fertilizers, biosolids and industrial wastes applied on a county/township basis, and develop a series of recommendations as to when, where and how nutrients should be applied to best reduce the risk of contamination to the surface and groundwater.

Ultimately, a successful pilot program could lead to statewide geologic mapping, nutrient impact analyses and innovative nutrient management strategies for all sources that could pose an impact to groundwater. Our members would like to offer their support and expertise in developing this pilot program. Please contact me with any questions or comments.

Thank you for your consideration of our comments. We look forward to discussing this matter further.

Sincerely,



Laurie Fischer
Executive Director

Enclosures:

- Letter from Richard Klemme, Interim Dean and Director, University of Wisconsin-Extension
- Memorandum from University of Wisconsin – Water Resources Related, Research and Outreach Interests (April 4, 2008)
- Review and Comment on the NE Wisconsin Karst Task Force Report, by Discovery Farms, University of Wisconsin-Madison (December, 2007)
- Discovery Farm Update on Karst, by Dennis Frame, UW-Discovery Farms (Excerpt taken from June 2008 Dairy Business Association Newsletter)
- Green Tier Charter between Dairy Business Association-Green Tier Advancement Project and Wisconsin Department of Natural Resources (November 29, 2007) (See Page 6)