HARRY AND LAURA NOHR TROUT UNLIMITED CAFO POSITION PAPER

The number and size of concentrated animal feed operations (CAFOs) is increasing dramatically throughout Wisconsin including the Driftless area**.** We contend the current permitting process has been inadequate in assuring protections for our fragile environment., While procedures required by statute (such as hearings, comment periods, environmental impact statements,etc) are technically being completed, serious review, accounting for legitimate and science based concerns of local landowners and other stakeholders are often overlooked. The public and the law demand a more comprehensive permitting process be implemented for CAFOs.

We recognize the importance of agriculture both as a producer of essential food crops and as part of the economic backbone of Wisconsin. We also recognize that agricultural "best management practices" exist which provide water quality benefits. These best practices are already being implemented by many family farms within the Nohr TU region but unfortunately not by all. Recent experience with poorly operated CAFOs in our area has been negative. Major fish kills and serious environmental damage as a result of manure spills has occurred. Sadly no changes in permitting, no repercussions, no penalties, no consequences for these violations.

The mission of the Harry and Laura Nohr Chapter of Trout Unlimited (Nohr TU) is to preserve, protect and restore cold-water fisheries and their watersheds. As a Chapter we achieve this through habitat restoration, advocacy, access acquisition, and education. The geographical area of Nohr TU includes Iowa, Grant, and Lafayette Counties in southwest Wisconsin, part of the Driftless Area of the upper Mississippi River Basin. We are fortunate to have a multitude of cold-water streams and rivers in our area, most of which run through private agricultural lands. Our chapter, working in conjunction with others, especially landowners, has invested over $1.6 million and tens of thousands of volunteer hours in our geographical area alone following this mission. Watershed improvements benefit fish and wildlife, landowners through reduced erosion and flood damage, recreational opportunities with better access, and provide direct economic benefit to the state and local communities.

A report, "Economic Impact of Recreational Trout Angling in the Driftless Area," authored by Donna Anderson, economics professor at the University of Wisconsin-La Crosse" and released in the spring of 2017, concluded improved access, high water quality and exceptional fishing contribute an estimated $1.6 billion-dollar annual economic impact to the Driftless economies. A previous study in 2007 estimated the economic impact at $1.1 billion dollars, indicating in the last decade this economic engine in the Driftless area has grown by 50%, or half a billion dollars. Poorly run CAFO's put all this progress at risk.

With these facts in mind, Nohr TU opposes further development and expansion of (CAFO's) in southwestern Wisconsin due to the danger posed not only to cold-water resources but to overall water quality, soil quality and human health. Specifically, Nohr TU has the following concerns about the development of CAFO's in southwestern Wisconsin:

1. CAFO's are facilities where large numbers of animals, in excess of 1,000 animal units in Wisconsin, are concentrated in a much smaller area than would be used with traditional agricultural methods.

2. CAFO's produce enormous volumes of animal waste and wastewater. The waste contains chemicals, fertilizers, pesticides, pathogens, antibiotics and other pollutants that pose significant public health hazards, and which can have long term damaging impacts on both surface and ground water as well as air and soil quality and can be deadly to aquatic life including fish.
3. Spreading liquid manure on fields is a pillar of CAFO's. Much of the Nohr TU area consists of clay, sandy soils and Karst geology, which are soil types that carry increased risk of pollution of surface and ground water from liquid manure spreading. The Wisconsin Dept. of Natural Resources (WDNR) permitting process for CAFO's fails to adequately consider this factor.
4. Other parts of the state, particularly northeast Wisconsin, have suffered devastating public health and water quality impacts because of the development of CAFO's in that area. A large and growing "dead zone" has been discovered in Lake Michigan's Green Bay because of high phosphorus levels. Nutrients in runoff from CAFO's is a significant contributing factor to this problem.
5. CAFO's tend to overload the capacity of soil to receive nutrients because of the massive number of animal units involved relative to the amount of land available for manure spreading. In turn, this creates excessive loading of chemicals such as phosphorus and nitrogen in the soil and runoff water.
6. Legislatively CAFO's are being treated as family farms, when in reality they are industrial facilities: Factories producing a product under one roof and discharging millions of gallons of waste, orders of magnitude more concentrated than a municipal wastewater treatment plant receives. Yet there is often limited or no treatment of wastes before discharging directly to the environment.
7. CAFO's consume massive amounts of groundwater for operations, adversely affecting groundwater tables. Lowering water tables reduce spring flows which are critical to all Driftless Area streams.

Nohr TU recognizes that the current permitting and regulatory framework places few limitations on the development of CAFO's and fails to adequately protect the people and waters of the state from CAFO related threats. While restating our opposition to the development of CAFO's in southwestern Wisconsin, we request:

1. A Moratorium on all new permits and expansions until proper safeguards can be implemented.
2. A CAFO permitting process that takes into consideration appropriate factors such as:
    A. Soil type and other relevant geological considerations and the potential harm to surface and groundwater created by the development of CAFO's in environmentally sensitive locations such as the Driftless Area.
    B. The proximity of a proposed operation to a stream, river or lake and the danger the operation poses to the water resource.
    C. The presence and number of other CAFO's or other sources of water pollutants in a watershed and the potential harm from cumulative effects rather than individual effects.
3. Consideration both in the permitting process and in the regulatory scheme of the nutrient load

carrying capacity of the soil and whether nutrients being spread on any field in the form of liquid manure will result in overloading the soil with nutrients in excess of healthy levels.

4. Appropriate limits on the number of CAFO’s in any watershed based on the unique geological and hydrological character of the watershed as well as the nonagricultural value of a watershed as a resource.
5. Regulations requiring CAFO’s to achieve a whole farm nutrient balance and to utilize best management practices and other practices of sustainable agriculture.
6. Tightened and meaningful monitoring of CAFO's by WDNR to protect cold-water resources and human health.
7. Mandatory consequences for violations including bonding to assure compliance and restoration for damages even if the operation declares bankruptcy.