



WISCONSIN LEGISLATURE

P.O. BOX 8952 • MADISON, WI 53708

October 13, 2011

Cathy Stepp, Secretary
Wisconsin Department of Natural Resources
101 S. Webster Street
PO Box 7921
Madison, WI 53711

Dear Secretary Stepp:

We write today to request that the Department of Natural Resources (DNR) reconsider its recent preliminary decision to approve proposed high capacity wells in Adams County, Town of Richfield for the project known as the Richfield Dairy.

Recent work by the Center for Watershed Science and Education (CWSE) at the University of Wisconsin-Stevens Point and the University of Wisconsin-Extension suggest that the evaluation of environmental impact made by the DNR was based on overly-simplistic modeling assumptions that do not accurately predict the full scope of impacts to nearby surface waters from this level of water withdrawal.

According to the letter your staff received from Professor George Kraft of the UW's CWSE, there are significant problems with the DNR's analysis. In particular, they suggest that water modeling used by the department is likely to grossly understate the impact of additional pumping of groundwater on surface water levels in the surrounding areas, especially during seasonal fluctuations.

The report also said: "The analyses described here indicate substantial water table drawdown and streamflow diversions already exist in the vicinity of the proposed Richfield wells. Within the context of how WDNR sets allowable amounts of surface water withdrawals from lakes and streams, these **groundwater pumping drawdowns and diversions seem in excess of what constitutes a "harm."** The proposed Richfield wells will exacerbate the drawdowns and diversions." (Emphasis added).

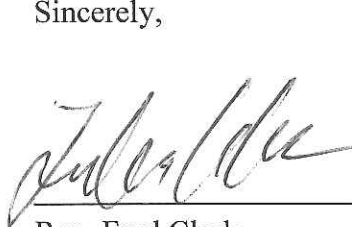
The implications of getting this permit wrong are too high to ignore. Many property owners on surrounding area lakes already face low or even empty lake beds – which is contributed to by extensive water withdrawals in this area. There can be little question that additional large capacity withdrawals will further worsen a bad situation, and will risk impacting the property value and quality of life for hundreds of area residents.

In discussing this project with your department staff they have made it clear that they were prepared to consider other credible analysis that challenged the finding that these wells would not cause undue environmental harm. The state-of-the-art, science-based analysis that has now been provided by one of Wisconsin's most respected hydrologists clearly meets that test.


We strongly urge you to reconsider the permit approval for this project in light of the evidence that has been provided.

At the very least, we request that the DNR conduct further environmental impact assessment to better consider the available evidence, including seeking an environmental impact report.


Sincerely,



Rep. Fred Clark
42nd Assembly District



Rep. Louis Molepske
71st Assembly District



Rep. Brett Hulsey
77th Assembly District