

May 7, 2021

Via Email to: DNRDGCentralSands@wisconsin.gov

Department of Natural Resources

Attn: Nicki Clayton – DG/5

P.O. Box 7921

Madison, WI 53707

Dear Ms. Clayton:

The Wisconsin Farm Bureau Federation (Farm Bureau) represents 47,000 members from across the State of Wisconsin including many who are engaged in farming in the Central Sands region. As such, we appreciate the opportunity to provide comments on the Department of Natural Resources (Department's) Central Sands Lakes Study related to water levels in Long Lake, Plainfield Lake and Pleasant Lake in Waushara County.

Importantly, we are pleased that the Department recognizes that lake levels in these lakes are currently at record high levels. As such, we recommend that the Department continue to carefully and deliberately engage stakeholders and the communities surrounding these lakes, including the farmers in the area, in any discussions related to these findings. We do not believe that these findings suggest that any immediate recommendations for regulatory action is warranted.

In addition, these historic water levels are reflective of the critical connection between precipitation and water levels in these lakes. We are pleased that the Department recognizes this point in the Study findings when it wrote, "We found that precipitation is the primary factor affecting lake level fluctuations and that reductions of lake levels are attributable to the collective, far-reaching effects of high capacity well pumping."

In our experience, farmer-led projects aimed at improving environmental outcomes are the projects that actually produce results. For example, Farm Bureau has been a determined supporter of the Producer-led Watershed Protection Grant Program through the Department of Agriculture, Trade and Consumer Protection because this grant program has empowered farmers and their neighbors to develop unique, workable solutions to produce measurable results. We are pleased that the Department also appears to support this approach. The Department writes, "...identification and implementation of best practices needs to originate from stakeholders." As such, any plan or recommendation to address water use in a particular region or around a particular waterbody must be developed from the field up. It must be flexible, economically reasonable, science-based, and locally led.

Farm Bureau questions the absence of an economic impact analysis from the department that per the December 8, 2017 dated 2017 Wisconsin Act 10: Central Sands Lake Study Scope of Work, should have been the first document issued by the department given the department's proposal of a special measure. Recommendations from the department in the 2021 report indicate creation of

a “water district” and it is our understanding that this would meet the statutory requirements of such special measures. It is essential that economic impacts of regulatory requirements such as a water district be thoroughly evaluated. Potato & vegetable production as well as dairy farms in the Central Sands region could be adversely impacted by this special measure and an economic impact analysis should be provided to establish an understanding of the regulatory effects on farmers who are currently utilizing sustainable practices to raise healthy foods in Central Wisconsin.

Ultimately, we request that an economic impact analysis is performed by the department given the special measure recommendation. In addition, any recommendations based on this study must support the development of a local, comprehensive approach between farmers and other stakeholders to work cooperatively to establish science-based, economically reasonable and appropriate action to protect water resources.

Thank you for your consideration.

Sincerely,

Karen Gefvert
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Wisconsin Farm Bureau Federation
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