



1156 Alpine Drive
Nekoosa, Wisconsin 54457

July 24, 2014

Mr. Russ Anderson
WDNR Environmental Review Coordinator
3911 Fish Hatchery Road
Fitchburg, WI 53711

RE: Golden Sands Environmental Impact Statement

Dear Mr. Anderson,

The Town of Rome is located two miles south of the proposed CAFO, and borders the cropland on which the manure will be spread and where many of the forty high capacity wells will be located. Rome has 2741 full time residents, and has 4262 residential properties with improvements, many of which are vacation homes. Rome is a recreational and retirement community. Many of the full time residents bought property as a weekend retreat, and then moved here after retirement. They chose Rome because it was a quiet community with clean water, clean air, and an abundance of natural resources in the area that provided many recreational opportunities. This continues to be why many people buy in Rome. The proposed CAFO now threatens the environment that brought people to the Town of Rome. Experience has shown that there are many environmental issues surrounding other CAFO operations in Wisconsin, and in the Midwest. There are air quality issues which should be controlled by the State and Federal air quality standards, but are difficult to monitor and enforce. The odor from the Factory Farm operation, and from the fields where the manure is applied is not controlled. Manure odor is very offensive to most people, and it will easily travel into Rome when the wind is blowing from the north or west.

There is a new campground less than two miles from the CAFO being built by the Wisconsin Trapshooting Assn on the site of their world class trapshooting complex. Their operational plan calls for attracting campers even when there are no trapshooting events. The income from the premier quality campground which will have 204 drive-through full hookup sites is needed to fund the operation of the complete facility. The presence of the manure odor, and the noise of the 24/7 operation will have a negative effect on attracting campers to make the campground successful. The WTA is projecting an investment of \$4.9 million into this project which includes a "Learning Center" for use by schools statewide for educational events. The annual income from the campground, shooting facility, and Learning Center is projected to be \$1.4 million per year, which will be jeopardized by the CAFO being located so close.

The Town of Rome is going to be the site of the Sand Valley Golf Resort which is under construction now. This will be mega golf facility that will draw visitors from around the country and world to play their links style courses. The developer chose the Town of Rome because of the rural area away from industrial development, the abundance of open rolling terrain, natural resources for other recreational activities, and clean air and water. Their long range business plan calls for developing five courses, lodging facilities, and full service club houses at an investment of \$100 million. When finished, this operation will employ hundreds of people in well paying positions. Even though the facility will be located in southern part of Rome, many of the guests will be arriving from the airports to the north where they would see and smell the CAFO as they arrive. This will be another major source of income for local residents and businesses, as well as tax revenue for the Town, County, and State. The successful operation of this facility would be jeopardized by the CAFO.

The proposed 6000 acres of cropland with forty additional high cap wells will have a negative effect on Rome's lakes and groundwater. Private water wells around other CAFO operations and near high concentrations of cropland have experienced increased nitrate levels, and contamination from the chemicals and pesticides used to the point where the well water is not safe to drink. Ground water levels have dropped as witnessed in the Plainfield and Plover areas. The Rome Town Board passed a resolution last year opposing the method that the DNR uses when issuing high cap well permits, because they are not considering the cumulative effect of multiple wells in the same area. This was forwarded to the Governor and State officials with no response.

There are about 3500 private wells in Rome with 1500 located within the three mile radius of the proposed high cap wells. In addition, the Rome Water Utility serves 1300 customers in the Lake Camelot area from their wells located 2.3 miles from the proposed high cap wells. Engineered studies have shown that there is a three mile cone of depression of ground water levels around each high cap well. Many of the 1500 private well owners stand a good chance of having their wells contaminated, and/or dried up when the ground water levels drop. They would then have to drill deeper wells, and/or purchase expensive filtration equipment to have safe drinking water. The cost to each property owner could be \$3000 to \$5000 or more. This could easily have a cost of \$4.5 to \$7.5 million to Town residents within the three mile radius of the high cap wells. The nitrate contamination would go beyond the three mile radius which would affect even more wells. The same issues will threaten the Rome Water Utility wells. In 1995, the Water Utility found that two wells were contaminated with nitrates from the agricultural area east of Rome resulting in the wells being taken out of service. A new well had to be drilled at a cost of \$600,000. Since 2006, another new well was drilled and the filtration equipment updated at a cost of \$1.6 million. If the Water Utility's current wells become contaminated with nitrates, the cost of the necessary filtration equipment will be over \$2 million, plus the waste disposal for the nitrate residue would be about \$40,000 per month, or \$480,000 per year. These costs would need to be charged back to the Water Utility customers. In addition to the air quality and ground water issues, some Town of Rome residents will have to contend with additional noise from the Factory 24/7 operation, and the additional 24/7 truck traffic through Rome. Rome would no longer be a quiet place to live.

A number of residents have already stated that if this CAFO is allowed, they will be selling their property as they did not move to Rome to live under these conditions. They want to sell their property before the value of Rome property drops as a result of the CAFO. Residential property in the northern part of Rome will see the greatest impact. There are numerous papers written documenting that the value of residential property within three miles of a CAFO declines, some places have been as much as 30%. As more properties are put on the market, all Town property values will be affected. There will be fewer buyers that want to buy in Rome, and put up with the air, water, and noise issues. When the supply exceeds the demand, property values drop. A good example of this was when the Town's residential property values dropped \$190.4 million (26%) from 2009 to 2013. This was because there were a lot of properties on the market, and nobody was buying. This will happen again if the environment that brings people to Rome is compromised by air, water, and noise issues. The 2014 assessed value of the residential property in Rome is \$574.4 million. Even a modest 5% decrease in property value would be \$28.7 million loss. A 10% decline would be \$57.4 million. Rome expects to see very little additional revenue from the CAFO, and the 25 farm hand employees that the CAFO will employ, so the economic impact to the Town of Rome will be all negative. When you look at all of the factors, this could easily be over \$50 million when you factor in the lost to the tourism industry, to businesses, both local and county wide, to the construction industry, and less jobs available. How will the Town of Rome, Adams County, and the residents be compensated for that loss?

In conclusion, this CAFO is proposed to be located in the middle of two residential communities. This is the worst possible location for this kind of operation. Consideration needs to be given to the fact that a private party wants to make a huge profit at the expense of the Town residents, both Saratoga and Rome. There are areas in central Wisconsin where there is open land with very few residents per square mile, and located many miles away from residential communities. If this type of operation is going to be permitted, that is where it should be located, not in Saratoga. We agree that the agricultural and dairy industries are a vital part of Wisconsin's economy, but the tourism and recreation industries also contribute many dollars to the economy. There needs to be a compromise reached to share and preserve our natural resources. In order to preserve wild life habitat, control soil erosion, and clean the air we breathe, there needs to be limits established to control the amount of forestry land that can be converted to cropland in any given area. We ask the Department of Natural Resources to take on the responsibility that has been assigned to them, to protect Wisconsin's natural resources, especially clean water and clean air.

Respectfully,

Town of Rome Board of Supervisors,

Chairman Phil McLaughlin

Supervisor Jerry Wiessinger

Supervisor Lore Djumadi

Supervisor Rick Bakovka

Supervisor David Repinski

*Rome strives to be a diverse community,
offering a variety of residential living, year around recreation
and business opportunities with an emphasis on
environmental preservation*