

# F R I E N D S of the APOSTLE ISLANDS NATIONAL LAKESHORE

PO Box 1574  
Bayfield, WI 54814

September 29, 2015

Mr. Bill Clark  
Environmental Review Supervisor  
Wisconsin Department of Natural Resources Service Center  
810 W. Maple Street  
Spooner, WI 54801

Dear Mr. Clark,

We appreciate the opportunity to provide input into your scoping process for the Environmental Impact Statement to evaluate the proposed Badgerwood Concentrated Animal Feeding Operation (CAFO) in Bayfield County, Wisconsin.

We are an organization whose mission is to promote an appreciation for, and preservation of, the natural environment and cultural heritage of the Apostle Islands National Lakeshore. Consequently we support the resource protection efforts of the National Park Service and their mission "to conserve the scenery and the natural and historic objects and the wild life therein and to provide for the enjoyment of the same in such manner and by such means as will leave them unimpaired for the enjoyment of future generations."

Since the Apostle Islands National Lakeshore is:

- the only national park unit wholly within the boundaries of Wisconsin, and created in 1970 (Public Law 91-424) "for...the preservation of the unique flora and fauna and the ...conditions now prevailing on the Apostle Islands within the lakeshore,"
- and in 2004 received Wilderness designation into our National Wilderness Preservation System because it is a place that "generally appears to have been affected primarily by the forces of nature, with the imprint of man's work substantially unnoticeable,"
- is a state-designated "Outstanding Natural Resource Water,"
- is greatly influenced by the quality of the water and air coming into the Chequamegon Bay area

- and is managed to **ensure that the citizens of this state will be assured the opportunity for wilderness, inspirational primitive and scenic experiences in the Apostle Islands into perpetuity.** The intent and purpose of Wisconsin Statutes 1.026 requires the DNR to ensure this right by taking into account the impact of their decision or action concerning the proposed CAFO, and future CAFOs, on the national park

We feel that your evaluation of the proposed facility and waste management process needs to include the following:

- The EIS needs to identify and address all special designations and legal protections influencing the park, and the impact of this proposal on the air and water clarity and quality so important to the intent and creation of this park, and its visitors.
- The EIS needs to project all findings into the future (National Parks are forever) when including data on hydrology, run-off, water and wind currents, nutrient transport and management regimes, impacts on the endangered Piping Plover on Long Island and others, and influences to commercial and recreational fisheries and their habitats and food webs so tied to the park. This projection should include the duration of this CAFO and a consideration of the cumulative impacts of similar facilities that may follow if this one is permitted.
- The EIS needs to identify the projected economic impact of changes in air and/or water clarity and quality to visitors, and tourist-dependent businesses and local governments. A new National Park Service (NPS) report shows that 290,060 visitors to Apostle Islands National Lakeshore in 2014 spent \$44 million in communities near the park. That spending supported 702 jobs in the local area and had a cumulative benefit to the local economy of \$53.8 million.

Our organization includes 700 people who care deeply about the future of the Apostle Islands National Lakeshore, the bay that buffers it from stresses, and the lake that supports it. We therefore urge a complete and thorough evaluation. Please let us know if we can be of any help.

Sincerely,

*Erica Peterson*

Erica Peterson

President, Friends of the Apostle Islands National Lakeshore