



November 6, 2020

Polk County Board of Supervisors  
Polk County Government Center  
100 Polk County Plaza  
Balsam Lake, WI 54180  
*Sent via email*

Re: Opposition to proposed Resolution 50-20

Dear Supervisors:

We are writing to you today on behalf of several Wisconsin-based agricultural groups to express our concern over the proposed Resolution 50-20, which deals with potential new regulations on livestock farms known as CAFOs in Polk County. This resolution could negatively impact farms in Polk County and the county's economy while doing little to address any of the concerns raised by those who support it. We urge you to oppose the proposed resolution.

Agriculture is the backbone of Polk County's economy. Livestock agriculture in particular plays a significant role in generating employment opportunities in rural Wisconsin. There are the jobs on the farm, but also those in supporting businesses and the processing industry, which often chooses to locate near areas with stable and growing farms. These farms are an important part of the economic mix that keeps rural communities strong and vibrant.

All of agriculture has changed tremendously over the course of the last couple of generations. There has been a slow and steady transition to fewer, but larger farms. This has led to an increase in the number of CAFOs. CAFO is just a term-of-art meaning a farm with at least 1,000 animal units. A farm can pass that threshold with 600-700 cows, especially if they raise their own heifers and calves. This is no longer a particularly large farm. Most CAFOs in Wisconsin are multi-generational family farms that have simply grown in place. They are not the threat that the proposed resolution makes them out to be.

It is also worth noting that the growth of farms into CAFOs comes with benefits. First, it often helps the farm with its bottom line and can be the change necessary to keep the next generation of the family in the business. At the same time, CAFOs are subject to more environmental regulations to protect the public. Larger farms can also afford to try new techniques and technology to better protect the environment. For example, we have a handful of CAFOs in the state that are using technology to treat the manure their animals generate to remove, clean and

discharge most of the water in the manure, while being left with a highly concentrated form of fertilizer that they can more easily apply and transport. In short, it is misguided to solely view CAFOs as an environmental threat.

The proposed resolution does not go into detail regarding what type of new regulations it hopes to see for CAFOs in Polk County. However, it must be mentioned that state law places several limitations on what the county can do to regulate CAFOs or other larger farms. The county must recognize that its options for new regulations are limited and it must be careful when considering any new ordinances dealing with this area of law. Early this year, some within county government proposed limitations specifically on swine CAFOs. That proposal was of questionable legality and the county was repeatedly advised against enacting such a rule by the state Department of Agriculture, Trade and Consumer Protection. Going down a similar path again would encounter identical legal obstacles.

There is a better path forward than the one outlined by the proposed resolution. Farmers want to be good neighbors. In Wisconsin, it is very likely that a CAFO owner lives in the same community as the farm. Indeed, most of them are owned by families that have been in the area for generations. These farms and families are not the enemy. Instead, it makes more sense for the county to work with its farms on shared goals. In nearby St. Croix County, a workgroup was formed of farmers, government officials and other private citizens to do just that. This provides a possible model for Polk County. Elsewhere around the state, governments are partnering with local farmers to work on watershed-specific projects to deal with environmental challenges. This collaborative approach is having measurable positive impacts. Passing an antagonistic resolution will not help. If anything, it could dissuade farmers from engaging with the county. We hope Polk County will decide to move forward together with its farmers for the good of everyone concerned.

Thank you,

John Holevoet, Dairy Business Association and Edge Dairy Farmer Cooperative  
Chris Owens, Polk County Farm Bureau  
Eric Birschbach, Wisconsin Association of Professional Agricultural Consultants  
Matt Ludlow, Wisconsin Cattlemen's Association  
Nicole Wagner, Wisconsin Corn Growers Association  
Keri Retallick, Wisconsin Pork Association