



December 13, 2023

Via Email (Tyler.Dix@wisconsin.gov)

Tyler Dix
CAFO Permit Coordinator
Wisconsin Department of Natural Resources
DNR Central Office
P.O. Box 7921
Madison, WI 53707-7921

Dear Mr. Dix:

On behalf of the Dairy Business Association and Edge Dairy Farmer Cooperative, thank you for the opportunity to provide comments on the proposed modification to the Wisconsin Pollutant Discharge Elimination System (WPDES) permit issued to Gordondale Farms Inc. (Permit No. WI-0062359-03-1). The proposed modification implements the September 11, 2023, settlement agreement reached between the Department of Natural Resources and Gordondale Farms. While our organizations do not advocate for the Department's implementation of groundwater monitoring at a land application site (field) in general, we applaud the efforts of the Department and Gordondale Farms in bringing closure to this litigation through settlement. We believe this modification sets forth a framework for actions during this permit term, providing the farm with a level of certainty regarding their farming operation for the remainder of their current permit term and beyond.

DBA is a statewide organization of dairy farmers of all sizes and business models, processors, allied industry partners and affiliated professionals. Edge Dairy Farmer Cooperative is one of the nation's largest dairy coops. We are based in Wisconsin and have a footprint in seven states. Our organization's promote new and emerging technologies for the benefit of all dairy farms. We support research into the effectiveness of new emerging farming practices — not only for advances in production but also for enhanced environmental sustainability.

DBA, Edge and our affiliated organization, Farmers for Sustainable Food, support farmer-led efforts aimed at protecting and improving water quality across the state by promoting and documenting continuous improvement. Emerging data shows that these efforts are making a positive difference. Hundreds of thousands of pounds of phosphorus are being prevented from entering waterways, and sediment erosion is being reduced by tens of thousands of tons. Farm-level data is being analyzed through a partnership with the Wisconsin Department of Agriculture, Trade and Consumer Protection; the University of Wisconsin-Madison; and The Nature Conservancy.

Wisconsin farming operations like Gordondale Farms are good stewards of our land and water resources. The farm has consistently engaged in voluntary conservation practices for decades and strives for continuous improvement in protecting and managing land and water resources.

We welcome the opportunity for continued engagement with the Department on these critical issues. Producing sensible and science-based solutions is essential for the success of compliance and regulatory programs and we look forward to working with the Department towards these goals in the future.

Sincerely,

Chad Zuleger
Associate Director of Government Affairs

Tim Baumgartner
Director Regulatory & Permitting Services

Dairy Business Association and Edge Dairy Farmer Cooperative