



124 ½ South Main Street • Viroqua, WI 54665
608.637.3615 • vsngeneral@gmail.com • www.kickapoovsn.org

~ Board of Directors ~

Kathy Crittenden
Tamara Dean
Kathy Fairchild
Cynthia Olmstead
Randy Kahn
Jessica Luhning
Sara Martinez
William Motlong

~ Advisory Board ~

Paul Bader
Kickapoo Woods Coop
Lynn Chakoian
Karstreport.org
Gary Eldred
Prairie Enthusiasts
Laura Hewitt
Trout Unlimited
Rob Horwich
Community
Conservation
Maggie Jones
Kickapoo Initiative
Sue Noble
VEDA
Jan Rasikas
Viroqua Food Coop
Ron Uhe
Businessman
Marilyn Volden
Viroqua Schools
Darin Von Ruden
WI Farmers Union
Marty McEvoy
McEvoy CPA, CFP

July 21, 2011

Mr. Lawrence Lynch
Wisconsin Department of Natural Resources
101 S. Webster Street, Box 7921
Madison, WI 53707

RE: Proposed High Capacity Well in Utica Township

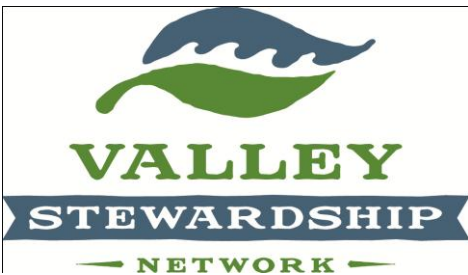
Dear Mr. Lynch,

After reviewing the Environmental Assessment (EA), the comment summary and response as well as letters submitted to you by Robert J. Nauta, Hydrogeologist for RJN Environmental Services and Timothy J Ehlinger, Associate Professor of Biological Sciences at UW-Milwaukee, it is the Valley Stewardship Network's belief that the EA completed in response to the proposed high capacity well by Mr. Darrell Long is insufficient and incomplete. In order to properly assess the potential impacts of a high capacity well at this site, thorough scientific testing and analysis in addition to the conclusions drawn from the EA must be completed before allowing the approval of the application.

Concerns with the EA arise for reasons including:

- **Only one measurement of stream flow was taken on Copper Creek.** Moreover, the measurement was calculated in March when higher-than-average stream flow values occur naturally as snowmelt and rain events contribute extensively to a greater volume of water passing through a cross-section of a stream during that time.
- **Inaccurate assumptions were made in reference to the underlying geology below the proposed well location.** It is the opinion of RJN Environmental Services, LLC, that upwelling springs were located on Mr. Long's property, while the EA conclusions were based on the assumption that aquitards comprised of low-permeable shale layers were present. The geology of the property needs to be further studied in order to draw scientifically-based conclusions.

~People of the Kickapoo Valley working together to promote good stewardship of the watershed.~



124 ½ South Main Street • Viroqua, WI 54665
608.637.3615 • vsngeneral@gmail.com • www.kickapoovsn.org

- **Groundwater level monitoring, as stated in the revised restrictions, cannot be assessed properly.** As Robert Nauta, Hydrogeologist for RJN Environmental Services, LLC states,

“A direct comparison of water levels to groundwater discharge into the stream, and the impacts to streambed temperature and stream chemistry is not possible.”

Therefore, groundwater modeling data needs to be generated by conducting an aquifer performance test, as outlined by the recommendations in Mr. Nauta’s letter to you.

- **The EA did not take into consideration the effects of reduced groundwater inputs to trout during the winter months.** According to Timothy J Ehlinger, Associate Professor of Biological Sciences, although trout are considered a cold-water fish, during the winter months the relatively warmer water flowing from springs is essential to prevent the eggs from freezing. Trout populations as well as upwelling areas specific to Copper Creek need to be studied more in depth before any additional conclusions can be drawn regarding the possible effects to native trout and other aquatic organisms.
- **There is not sufficient evidence to conclude that if trout populations were adversely affected that they would be able to recover.** According to Mr. Ehlinger, making that assumption is a gross misstep as many complex factors attribute to whether a fish population can rebound after a human induced stressor.

Further studies need to be conducted in order to properly generate scientifically-based conclusions concerning the potential for adverse environmental impacts directly correlating to the high capacity well proposed near Copper Creek. Furthermore, the Valley Stewardship Network agrees and asserts that these studies need to be peer-reviewed by qualified fisheries biologists and hydrogeologists outside of the WDNR.

Thank you for your consideration of our comments and concerns.

Sincerely,
Katya Leonard
Water Quality Program Coordinator
Valley Stewardship Network

VSN’s mission is to promote stewardship and inspire cooperative efforts to improve the sustainability of the communities and ecosystems in the Kickapoo Watershed region.

~People of the Kickapoo Valley working together to promote good stewardship of the watershed.~