Areas of concern about Gilbert Farm Expansion

* Sinkhole near production facilities in a closed depression reported by Bill Schuster, former head of Door County Soil and Water. Any manure containment breach flows by gravity into the sinkhole and into groundwater aquifer. In 2023, two liquid manure containment malfunctions occurred elsewhere in Door County causing spillage. The sinkhole is a significant concern because of the two older liquid manure storage facilities containing 1 and 2 million gallons located near it on the Gilbert Farm.
* A four-fold increase in volume of liquid waste to be processed and spread on approximately the same acreage of land. Currently at 5.7 million gallons per year, the proposed expansion increases this to 21.4 million gallons due to bringing other areas of the farm into compliance and increased animal units.
* Concerns for well water safety and impacts to groundwater and surface water quality. Numerous instances of wells contaminated by nearby large farms in Kewaunee County and some in Door County. Our beaches have had numerous frequent closures in recent years; Sturgeon Bay has had significant increase in aquatic plants necessitating cutting of channels for boating etc. Increased phosphates and nitrates from CAFO’s contribute to this destruction (see Dan Egan’s books on the Great Lakes for general examples).
* Shallow soil and our porous karst geology render Door County a very unsuitable location for CAFO’s.
* The importance of maintaining water quality for our tourism industry, particularly relevant if one owns a business dependent upon tourism. Agriculture only contributed approximately $55 million to Door County’s GDP in 2024. Tourism contributed at least 7X that amount (Real Estate, Rental & Leasing $246 million, Accomodations & Food $200 million, Retail Trade $187 million).
* The monitoring wells recommended by the permit hydrogeologist are not mandated until late 2029, allowing CAFO to operate for 4 years without proper monitoring.
* Kellner Fen and Crossroads at Big Creek are ecologically significant lands within 3 miles of CAFO. Citizens of Wisconsin have spent millions to preserve these areas through Knowles-Nelson grants and private donations. Both areas contain significant wetlands that are surface water and underground spring fed. Kellner Fen is a recognized critical habitat for the federally listed endangered species, the Hines Emerald Dragonfly.

**Environmental Review Transparency (NR 150)**

* The DNR must do an environmental review for major actions and share it publicly.
* No environmental review or staff memo is posted for public comment yet.
* Without transparency, local residents can’t understand groundwater risks or explore alternatives.

Comment options:

* Request DNR publish Gilbert’s Environmental Analysis Questionnaire and the internal staff analysis memo before final permit decision.
* Ask DNR to host an informational session or open house that walks through NR 150 findings and answers public questions.
* If new significant information is raised during comments, request that DNR reopen or supplement its analysis before issuing the permit.

**Land Access & Agreements**

* To manage manure safely, the farm needs enough land under legal control—not just unsigned or verbal arrangements.
* Some spreading fields are rented or agreed on verbally, and the final usable land may shrink after bedrock checks.
* Not enough land could mean illegal spreading or emergency hauling.

Comment options:

* Require signed spreading/export agreements for all non-owned fields before permit approval, with terms covering the 5-year permit window.
* After field-verified Silurian results are submitted, require DNR to reconfirm land-base sufficiency and adjust the NMP if needed.
* Require annual certification of land access and any export contracts as a condition of permit continuation.