



July 27, 2022

File Ref: FID #701040560

Adams County
SW Approvals

Mr. Charlie Kuhn
Adams County Landfill
1420 State Highway 21
Friendship, Wisconsin 53934

Subject: Initial Site Inspection of Proposed Vertical Landfill Expansion, Adams County Landfill
License #3150

Dear Mr. Kuhn:

This letter documents the initial site inspection (ISI) performed by the Department of Natural Resources (department) on June 29, 2022, for the proposed vertical expansion of the Adams County Landfill, and the department's preliminary opinion regarding the suitability of the site location. Department staff conducted the inspection with staff from Adams County (county) and a representative from Ayres Associates (Ayres), the county's consultant. The purpose of the inspection was to identify any potential conflicts the proposed expansion might have with the location and performance standards in s. NR 504.04, Wis. Adm. Code.

As part of the inspection, the department evaluated the information in Ayres' May 31, 2022 ISI request letter submitted on behalf of the county. According to the letter, the proposed expansion consists of a vertical expansion over Phases 2 through 5 of the existing municipal solid waste (MSW) landfill located in the SW ¼ and the SE ¼ of the NE ¼ of Section 13, Township 18N, Range 5E, Town of Strong Prairie, Adams County, Wisconsin.

Based on the review of the May 31, 2022 ISI request and observations from the ISI, the department's preliminary opinion regarding the suitability of site location is that the site location has potential. No apparent conflicts with the locational criteria contained in s. NR 504.04(3), Wis. Adm. Code, or the performance standards contained in s. NR 504.04(4), Wis. Adm. Code, were noted. However, a more detailed evaluation of the locational criteria should be provided in the Initial Site Report (ISR). If there are conflicts that cannot be satisfactorily addressed in accordance with applicable requirements, the conflicts would be constraints to site development.

Summary of Locational Criteria: As described in s. NR 504.04(3)(a) to (i), Wis. Adm. Code, there are several locational criteria that apply to the proposed landfill expansion. The proposed limits of filling may not be located within:

- (a) *1,000 feet of any navigable lake, pond or flowage.* According to the ISI request, the proposed limits of waste are not located within 1,000 feet of a navigable lake, pond or flowage. The department's Surface Water Data Viewer (SWDV) does not indicate the presence of any navigable lake, pond or flowage within 1,000 feet of the proposed expansion.
- (b) *300 feet of any navigable river or stream.* According to the ISI request, no navigable rivers or streams are located within 300 feet of the proposed site. According to the SWDV, Big Roche A Cri Creek is located over 4,000 feet from the proposed limits of waste. Additional information regarding the nearest navigable river or stream to the site should be provided in the ISR.
- (c) *A floodplain.* According to the ISI request, the proposed expansion is not within a floodplain. The SWDV also indicates this area is not in a floodplain.

- (d) *1,000 feet of the nearest edge of the right-of-way of any state trunk highway, interstate or federal aid primary highway or the boundary of any public park or state natural area, unless the landfill is screened.* According to the ISI request, the proposed expansion is not within 1,000 feet of any highway, public park or state natural area. The closest highway is State Highway 21, located approximately 3,000 feet south of the proposed expansion. Additional information regarding the nearest highways and public parks to the site should be provided in the ISR.
- (e) *An area where the design or operation of the landfill would pose a significant bird hazard to aircraft.* The ISI request states that there are no airports designed or planned within 5,000 feet of the proposed limits of waste. Additional information regarding the nearest airports to the site should be provided in the ISR.
- (f) *1,200 feet of any public or private water supply well.* The ISI request states that no public or private wells are located within 1,200 feet of the proposed expansion boundary. The distance from the proposed expansion to the private well that supplies water to the landfill should be specified in the ISR. Further discussion regarding public and private wells in the area would also be addressed in the feasibility report.
- (g) *200 feet of a fault that has had displacement in Holocene time.* The ISI request states that the proposed expansion is not within 200 feet of a fault that has had displacement since Holocene time. This assessment will be completed during the ISR and feasibility reviews.
- (h) *Seismic impact zone.* The ISI request concludes that the site is not in a seismic impact zone. This assessment will be completed during the ISR and feasibility reviews.
- (i) *Unstable areas.* The ISI request states there is no evidence of unstable conditions at the site. This assessment will be completed during the ISR and feasibility reviews.

It appears that the site meets, or could be constructed and operated to meet, the performance standards in s. NR 504.04(4), Wis. Adm. Code.

- (a) Wetland Areas –Based on a review of the department’s SWDV, adverse impacts to wetlands are not anticipated from the proposed expansion.
- (b) Critical Habitat Areas - Based on a review of the Natural Heritage Inventory (NHI), it appears unlikely that there would be any significant adverse impact on critical habitat areas or endangered or threatened species due to the proposed landfill expansion. Additionally, a vertical landfill expansion is covered by the No/Low Impact List for All Species at All Times of the Year category under the department’s Broad Incidental Take Permit/Authorization, as provided for under s. 29.604 Wis. Stats. Further review for endangered resources is not anticipated for the proposed project.
- (c) Archaeological Resources: According to the ISI request, Ayres conducted a historical and archaeological search at the Wisconsin Historical Society using the Wisconsin Archaeological Site Inventory and the Architectural Historical Inventory databases in Madison, Wisconsin. No known historic or archaeological findings were identified within the proposed project area.

Archaeological issues and historical structures for the site were cleared by Richard Kubicek, Departmental Archaeologist/Departmental Historic Preservation Officer, on June 6, 2022.

The performance criteria outlined in s. NR 504.04(4)(c) through (f), Wis. Adm. Code, include evaluation of surface water, groundwater, gas migration and air contaminant impacts. These performance criteria would be evaluated during the department's review of a feasibility report for the proposed expansion.

Please remember that s. NR 509.04(4)(d), Wis. Adm. Code, requires submittal of a 7.5 Minute USGS map or equivalent with a minimum scale of 1 inch=500 feet. The ISI request included a 1 inch=10,000 feet scale topographic map; however, a 1 inch=500 feet scale map will be required in the ISR submittal. Several maps at this scale may be needed to show all items listed in this code section, which include the depiction of contour intervals to sufficiently show relief, surface waters, floodplains, existing land use conditions including the location of public parks, and all water supply wells and residences located within one mile of the property boundaries of the proposed landfill.

To assist the department's review of documents, please follow the general submittal requirements in s. NR 500.05, Wis. Adm. Code, and ensure that all visuals show the proposed expansion boundaries, relevant radii around the site (e.g., 1,000 feet, 1,200 feet, one mile) depending on the information portrayed on the figure, and follow the requirements listed in s. NR 500.05(6), Wis. Adm. Code.

The locational and performance criteria will be evaluated again as the department reviews the ISR and feasibility report. Please keep in mind that as the department continues its review of the proposed expansion and as new information is presented, the department may have additional questions, concerns or requests for further information before a feasibility determination is made.

Please do not hesitate to contact me at 608-931-9387 or by email at carolyn.cooper@wisconsin.gov with any questions about this letter.

Sincerely,

Carolyn Cooper
Carolyn Cooper
Hydrogeologist
South Central Region

cc: Michael Leopold, Ayres (e-copy)
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