Why You Should Read This: The document below reviews the environmental impact likely from a State Revolving Fund project. As part of the environmental review, you are entitled to provide comments. If you have concerns about the environmental impact of this project, raise them now. We encourage public input in this decision-making process.

IOWA STATE REVOLVING FUND
FINDING OF NO SIGNIFICANT IMPACT

December 4, 2025

To: All Interested Citizens, Government Agencies, and Public Groups

An environmental review has been performed based on the procedures for implementing the National Environmental Policy Act (NEPA), for the proposed agency action below:

Applicant: City of Luana
County: Clayton
State: Iowa
SRF Number: CS192115101
Iowa DNR Project Number: W2024-0012A

Luana 3-Cell Controlled Discharge Lagoon System Project

The City of Luana, Iowa is planning an upgrade to their wastewater infrastructure. The city has applied for financial assistance through the State Revolving Fund (SRF) loan program to build the project. The State Revolving Loan Program is a program authorized by the Environmental Protection Agency (EPA) and administered by the Iowa Department of Natural Resources (DNR) in partnership with the Iowa Finance Authority. This project will not be receiving federal funds through SRF.

The City of Luana is located in Clayton County, Iowa approximately 25 miles southeast of Decorah, Iowa and 55 miles northwest of Dubuque, Iowa. The population of Luana according to the 2020 US Census was 301. The design population equivalent for the year 2045 is 367.

The City's existing WWTF, dating back to the early 1970s, is comprised of two controlled discharge lagoons. This facility was originally designed to accommodate an average dry weather flow rate (ADW) of 0.026 million gallons per day (MGD) and an average wet weather flow rate (AWW) of 0.031 MGD. The system was designed for a total population equivalent of 369 persons, but due to unforeseen circumstances the facility is currently operating at a significantly reduced capacity and upgrades are needed.

Previous assessments raised concerns about potential leakage in the lagoons, prompting two separate leakage tests yielding inconclusive results. In response, MSA Professional Services was engaged in 2009 to evaluate the WWTF. The recommendations included constructing a new lift station, removing sludge from the lagoons, and building an influent flow measurement structure for accurate flow measurements.

During the sludge removal process in the fall of 2009, the discovery of rock outcroppings in the north end of the east cell required immediate action. The City then contacted IDNR, who directed the City to use only the west lagoon until a temporary fix was implemented. In the summer of 2010, a berm was constructed across the east cell to isolate the wastewater from the bedrock outcroppings.

To bring the WWTF in compliance, the primary focus needs to be on addressing the bedrock discovery in the City's existing east lagoon. IDNR design standards mandate a four-foot separation between bedrock and a lagoon bottom, along with the use of a geosynthetic liner. Geotechnical investigations revealed the presence of bedrock outcroppings in the vicinity, leading to the assumption that the existing lagoons are situated in a outcropping-prone area. Furthermore, IDNR standards necessitate the establishment of three cells when the total surface area of the lagoons exceeds one acre, which is the case for the existing lagoons.

The purpose of this project is to make improvements to the wastewater treatment facilities to enhance their reliability and to replace obsolete systems to safely and reliably operate the City of Luana's wastewater system for the next 20 years.

The proposed project includes the construction of a three cell controlled discharge lagoon treatment system and all necessary connections and appurtenances.

All wastewater generated in the City of Luana is collected and treated at the WWTF. After treatment and holding time, the treated wastewater gravity flows via pipe to Unnamed Creek. The designations for the current receiving stream network were determined during the Use Attainability Analysis (UAA). Specifically, Unnamed Creek is labeled as A1, B(WW-1). Class A1 indicates waters in which recreational or other uses may result in prolonged and direct contact with the water, involving considerable risk of ingesting water in quantities sufficient to pose a health hazard. Such activities would include, but not be limited to, swimming, diving, water skiing, and water contact recreational canoeing. Class B(WW-1) indicates waters in which temperature, flow and other habitat characteristics are suitable to maintain warm water game fish populations along with a resident aquatic community that includes a variety of native nongame fish and invertebrate species. These waters generally include border rivers, large interior rivers, and the lower segments of medium-size tributary streams.

The project will not significantly affect the pattern and type of land use (industrial, commercial, agricultural, recreational, residential) or growth and distribution of population. The project will not conflict with local, regional or State land use plans or policies. The project will not impact wetlands provided the terms of the permit are abided by and mitigation completed. The project will not affect threatened and endangered species or their habitats provided that any tree cutting is conducted between October 1 and March 31 to avoid impacting endangered bats. If any State- or Federally-listed threatened or endangered species or communities are found during the planning or construction phases, additional studies and/or mitigation may be required. The project will not displace population, alter the character of existing residential areas, or convert significant farmlands to non-agricultural purposes. The project will not affect the 100-year flood plain provided all necessary floodplain development permits, state and local, are obtained and the terms of which are abided by. The project will not have effect on parklands, preserves, other public lands, or areas of recognized scenic or recreational value.

No historic properties will be adversely affected by the proposed project. However, if project activities uncover any item(s) that might be of archaeological, historical, or architectural interest, or if important new archaeological, historical, or architectural data should be encountered in the project APE, the applicant should make reasonable efforts to avoid further impacts to the property until an assessment can be made by an individual meeting the Secretary of the Interior's professional qualifications standards (36 CFR Part 61).

The project will not have a significant adverse effect upon local ambient air quality provided the applicant takes reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property during the proposed project (567 IAC 23.3(2)"c"). The project will not have a significant adverse effect upon local ambient noise levels, surface water quantity, groundwater quality or quantity, or

water supply. No significant impact to surface water quality, fish, shellfish, wildlife, or their natural habitats is expected provided that an NPDES General Permit Number 2 (for storm water discharge associated with construction activities) is obtained and the terms of which are abided by.

Minimum separation distances will be maintained. Noise during construction will be maintained at tolerable levels through controls on construction activities. Any construction debris will be removed from the site for proper disposal. Adverse environmental effects from construction activities will be minimized with proper construction practices, inspection, prompt clean up and other appropriate measures. Areas temporarily disturbed by the construction will be restored.

It has been determined that the proposed action will result in no significant impacts to the surrounding environment. This determination is based on a careful review of the engineering report, the environmental assessment and other supporting data which are on file at the Department of Natural Resources' office in Des Moines, Iowa. These are available for public review upon request. A copy of the environmental assessment is attached. This Department will not take any administrative action on the project for at least thirty (30) calendar days from the above date. Persons disagreeing with the above environmental decision may submit comments to the department during this period. Your comments can be sent to SRF-PC@dnr.iowa.gov or directly to me at Hailey.Andersen@dnr.iowa.gov or (515) 321-7385.

Sincerely,

Digitally signed by
Hailey Andersen
Date: 2025.12.04
12:02:40 -06'00'

Hailey Andersen
Environmental Specialist
6200 Park Ave, Suite 200
Des Moines, IA 50321

Enclosures: Environmental Assessment Document
Project Map

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Kelly Beard-Tittone, USEPA Region VII
The Outlook

Why You Should Read This: The document below reviews the environmental impact likely from a State Revolving Fund project. As part of the environmental review, you are entitled to provide comments. If you have concerns about the environmental impact of this project, raise them now. We encourage public input in this decision making process.

IOWA State Revolving Fund

IOWA STATE REVOLVING FUND
ENVIRONMENTAL ASSESSMENT DOCUMENT

PROJECT IDENTIFICATION

Applicant: City of Luana
County: Clayton
State: Iowa

SRF Number: CS192115101
Iowa DNR Project Number: W2024-0012A

COMMUNITY DESCRIPTION

Location: The City of Luana is located in Clayton County, Iowa approximately 25 miles southeast of Decorah, Iowa and 55 miles northwest of Dubuque, Iowa.

Population: The population of Luana according to the 2020 US Census was 301. The design population equivalent for the year 2045 is 367.

Current Waste Treatment: The City's existing WWTF, dating back to the early 1970s, is comprised of two controlled discharge lagoons. This facility was originally designed to accommodate an average dry weather flow rate (ADW) of 0.026 million gallons per day (MGD) and an average wet weather flow rate (AWW) of 0.031 MGD. The system was designed for a total population equivalent of 369 persons, but due to unforeseen circumstances the facility is currently operating at a significantly reduced capacity and upgrades are needed.

Previous assessments raised concerns about potential leakage in the lagoons, prompting two separate leakage tests yielding inconclusive results. In response, MSA Professional Services was engaged in 2009 to evaluate the WWTF. The recommendations included constructing a new lift station, removing sludge from the lagoons, and building an influent flow measurement structure for accurate flow measurements.

During the sludge removal process in the fall of 2009, the discovery of rock outcroppings in the north end of the east cell required immediate action. The City then contacted IDNR, who directed the City to use only the west lagoon until a temporary fix was implemented. In the summer of 2010, a berm was constructed across the east cell to isolate the wastewater from the bedrock outcroppings.

To bring the WWTF in compliance, the primary focus needs to be on addressing the bedrock discovery in the City's existing east lagoon. IDNR design standards mandate a four-foot separation between bedrock and a

lagoon bottom, along with the use of a geosynthetic liner. Geotechnical investigations revealed the presence of bedrock outcroppings in the vicinity, leading to the assumption that the existing lagoons are situated in a outcropping-prone area. Furthermore, IDNR standards necessitate the establishment of three cells when the total surface area of the lagoons exceeds one acre, which is the case for the existing lagoons.

PROJECT DESCRIPTION

Purpose: The purpose of this project is to make improvements to the wastewater treatment facilities to enhance their reliability and to replace obsolete systems to safely and reliably operate the City of Luana's wastewater system for the next 20 years.

Proposed Improvements: The proposed project includes the construction of a three cell controlled discharge lagoon treatment system and all necessary connections and appurtenances.

Receiving Stream: All wastewater generated in the City of Luana is collected and treated at the WWTF. After treatment and holding time, the treated wastewater gravity flows via pipe to Unnamed Creek. The designations for the current receiving stream network were determined during the Use Attainability Analysis (UAA). Specifically, Unnamed Creek is labeled as A1, B(WW-1). Class A1 indicates waters in which recreational or other uses may result in prolonged and direct contact with the water, involving considerable risk of ingesting water in quantities sufficient to pose a health hazard. Such activities would include, but not be limited to, swimming, diving, water skiing, and water contact recreational canoeing. Class B(WW-1) indicates waters in which temperature, flow and other habitat characteristics are suitable to maintain warm water game fish populations along with a resident aquatic community that includes a variety of native nongame fish and invertebrate species. These waters generally include border rivers, large interior rivers, and the lower segments of medium-size tributary streams.

ALTERNATIVES CONSIDERED

Alternatives Considered: *Mechanical Wastewater Treatment Plant* - Mechanical wastewater treatment plants incorporate aeration and clarification in order to promote and control proper biological activity. While many different methodologies exist within the mechanical wastewater treatment plant realm, only one (Aero-Mod) was considered as an alternative for this project. Other methods can provide the same result with similar costs. This alternative would involve the installation of a headworks building for screening and grit removal, aeration basins and clarifiers, modifications to the existing lagoon for sludge storage, and a new disinfection and post aeration structure, as well as ancillary construction features.

Lemna Covered Aerated Lagoon Biological Treatment - The LemTec treatment system includes two multi-use aeration tanks and Lemna Polishing Reactors, and two 7.5 hp blowers. Common berm construction provides for ease of construction and a reduced footprint, both resulting in cost savings. The alternative would include: installation of screening and flow measurement devices, installation of multi-use ponds for aeration and clarification (LemTec), and installation of Polishing Reactor. The treatment lagoons are operated in series that are divided into two discrete treatment zones. This is done through the use of the LemTec reverse miter baffle system that provides a total of four treatment cells. The first lagoon consists of a complete mix cell with a high-rate diffuser that is split by a hydraulic baffle and has a partial mix cell with a low-rate diffuser afterwards. The second pond also consists of a partial mix cell with low-rate diffusers again split by hydraulic baffle then passing into a settling cell. Lastly, the wastewater flows on to the Lemna polishing reactors and then to the effluent.

Controlled Discharge Wastewater Treatment Facility - The existing two cell lagoon may be modified in order to provide for treatment of the influent wastewater design load to the levels required by current and future NPDES permit. The existing lagoon would be filled in and raised to create at a minimum, a 4 feet of separation between the bedrock and lagoon bottom. New berms would be constructed on top of this fill material for the proposed secondary cells. The proposed top of berm elevation was determined based upon the optimization of the cut and fill volumes to ensure there was ample separation, as well as the ability to use the soil that was already on site. A new primary cell would be constructed to the southeast of the existing lagoon. The proposed primary cell construction would require the purchase of adjacent property. The primary lagoon has a triangular berm footprint at the southern point to help convey stormwater towards Unnamed Creek.

Connection to an adjacent utility - An alternative considered for the City of Luana was to pump all wastewater to the City of Monona for regional treatment. This alternative would require approximately 18,000 lineal feet of 4-inch forcemain to be installed from the existing WWTF in Luana to the WWTF in Monona. It is likely that two lift stations would have to be installed due to the distance between the two municipalities.

Reasons for Selection of Proposed Alternative: The Aero-Mod activated sludge system would offer some advantages including: common wall construction for clarification, aeration basin and aerated digester; provides for required treatment of BOD and Ammonia Nitrogen; ease of assimilation of shock loads and other potential high strength wastes; and ability for future expansion. Disadvantages include: requires training of operations personnel for new treatment method; more time-consuming operation than other options; requires a minimum grade II operator; high cost relative to other options; electric utility extension with mechanical equipment resulting in monthly electric bill.

The Lemna treatment system would offer some advantages including: provides for required treatment of BOD and Ammonia Nitrogen; ease of assimilation of shock loads and other potential high strength wastes; ability for future expansion. Disadvantages include: requires training of operations personnel for new treatment method; more time-consuming operation than other options; requires a minimum grade II operator; higher cost than lowest cost option; electric utility extension with mechanical equipment resulting in monthly electric bill.

Construction of a controlled discharge lagoon wastewater treatment system would offer some advantages including: no mechanical and electrical utility expansions nor monthly electric bills; limited operational oversight required for a controlled discharge lagoon. The operational requirements for a controlled discharge lagoon are significantly less than any other treatment method; lowest cost alternative. Disadvantages include: currently the Iowa DNR is evaluating other constituents discharged from controlled discharge lagoons which may lead to more stringent and additional limits; inability to assimilate high strength waste (non-issue if industrial discharges are not anticipated in the future).

Advantages of connecting to an adjacent facility include: staff is not required to operate a WWTF; compliance with discharge is handled by separate entity. Disadvantages include: possible lack of control of user rates; higher costs compared to other alternatives

In order to provide for a quality effluent from the WWTF and allow for future expansion, the recommended improvement is to expand the existing controlled discharge lagoon facility at and adjacent to the existing WWTF site. A 3-cell controlled discharge is the easiest to operate and most cost-effective alternative that was evaluated.

MEASURES TAKEN TO ASSESS IMPACT

Public Involvement: A public hearing was held on September 5, 2024 at 7:00PM at the City's regular council meeting. The public notice of this hearing was made available by publication in The Outlook on June 18, 2025 and posted to the City social media accounts on June 20, 2025 and posted in public locations on June 18, 2025. The purpose of this hearing was to present the environmental and financial impacts of the proposed improvement project. No written or oral comments were received.

Coordination and Documentation with Other Agencies and Special Interest Groups: The following Federal, state and local agencies were asked to comment on the proposed project to better assess the potential impact to the environment:

U.S. Army Corps of Engineers
U.S. Fish and Wildlife Service
State Historical Society of Iowa (State Historical Preservation Office)
Iowa DNR Conservation and Recreation Division
Iowa DNR Flood Plain Management Section
Citizen Band Potawatomi Indian Tribe
Flandreau Santee Sioux
Ho-Chunk Nation
Iowa Tribe of Kansas and Nebraska
Iowa Tribe of Oklahoma
Kickapoo Tribe in Kansas
Kickapoo Tribe of Oklahoma
Lower Sioux Indian Community Council
Miami Tribe of Oklahoma
Omaha Tribal Council
Osage Tribal Council
Otoe-Missouria Tribe
Pawnee Nation of Oklahoma
Peoria Tribe of Indians of Oklahoma
Ponca Tribe of Indians of Oklahoma
Ponca Tribe of Nebraska
Prairie Band Potawatomi Nation
Prairie Island Indian Community
Sac & Fox Nation of Mississippi in Iowa
Sac & Fox Nation of Missouri
Sac & Fox Nation of Oklahoma
Santee Sioux Nation
Shakopee Mdewakanton Sioux Community
Sisseton-Wahpeton Oyate
Spirit Lake Tribal Council
Three Affiliated Tribes Mandan, Hidatsa & Arikara Nations
Upper Sioux Tribe
Winnebago Tribal Council
Yankton Sioux Tribal Business and Claims Committee
Clayton County Historic Preservation Commission

No adverse comments were received from any agencies or general public. Conditions placed on the applicant by the above agencies in order to assure no significant impact are included in the Summary of Reasons for Concluding No Significant Impact section.

ENVIRONMENTAL IMPACT SUMMARY

Construction: Traffic patterns within the community may be disrupted and above normal noise levels in the vicinity of the construction equipment can be anticipated during construction and should be a temporary problem. Adverse environmental impacts on noise quality will be handled by limited hours of contractor work time during the day. Other adverse environmental effects from construction activities will be minimized by proper construction practices, inspection, prompt cleanup, and other appropriate measures. Areas temporarily disturbed by the construction will be restored. Solid wastes resulting from the construction project will be regularly cleared away with substantial efforts made to minimize inconvenience to area residents.

Care will be taken to maintain dirt to avoid erosion and runoff. The proposed project will disturb one or more acres of soil; therefore, the applicant is required to obtain an NPDES General Permit Number 2 (for storm water discharge associated with construction activities) and abide by its terms. Provided that this permit is obtained and the terms of which are abided by, no significant impact to surface water quality, fish, shellfish, wildlife, or their natural habitats is expected.

Temporary air quality degradation may occur due to dust and fumes from construction equipment. The applicant shall take reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property during the proposed project (567 Iowa Administrative Code IAC 23.3(2)“c”).

This project may require the disposal of sewage sludge. It is the responsibility of the applicant to ensure that the disposal of any sewage sludge complies with applicable requirements found in 40 CFR Part 503 and 567 Iowa Administrative Code IAC 67.

Historical/Archaeological: Various Native American tribes with an interest in the area and the Certified Local Government were provided information regarding the project. This project will not be receiving federal funds through SRF. As such, this project is not considered a federal undertaking as defined in §300320 under the National Historic Preservation Act, 54 U.S.C. 300101 et seq. for the purpose of the SRF environmental review. If this SRF project receives federal funds from other sources, it is the responsibility of the applicant to ensure all federal requirements are met for that funding.

However, if project activities uncover any item(s) that might be of archaeological, historical, or architectural interest, or if important new archaeological, historical, or architectural data should be encountered in the project APE, the applicant should make reasonable efforts to avoid further impacts to the property until an assessment can be made by an individual meeting the Secretary of the Interior’s professional qualifications standards (36 CFR Part 61).

Environmental: According to the Iowa DNR Conservation and Recreation Division, the proposed project will not interfere with any State-owned parks, recreational areas or open spaces. The U.S. Army Corps of Engineers concurs that the project will not impact wetlands provided the terms the permit are abided by and mitigation completed. The project will not impact any wild and scenic rivers as none exist within the State of Iowa. The

U.S. Fish & Wildlife Service Section 7 Technical Assistance website consultation determined, and Iowa DNR Conservation and Recreation Division agree, that the project will not impact protected species or their habitats provided that any tree cutting is conducted between October 1 and March 31 to avoid impacting endangered bats. However, if any State- or Federally-listed threatened or endangered species or communities are found during the planning or construction phases, additional studies and/or mitigation may be required. According to the Iowa DNR Flood Plain Management Section, this project will not impact the 100-year floodplain provided all necessary floodplain development permits, state and local, are obtained and the terms of which are abided by. No adverse impacts are expected to result from this project, such as those to surface water quantity, or groundwater quality or quantity. Therefore, no significant impact to surface water quality, fish, shellfish, wildlife, or their natural habitats is expected.

Land Use and Trends: The project will not displace population nor will it alter the character of existing residential areas. The proposed project is within the present corporate limits of Altoona in areas zoned residential, commercial, or industrial. Although approximately 8 acres of farmland are being converted from agricultural use, this area was previously rezoned to industrial use. Further investigation of the farmland conversion impact is not required for this environmental review. This project should not impact population trends as the presence or absence of existing water/sewer infrastructure is unlikely to induce significant alterations in the population growth or distribution given the myriad of factors that influence development in this region. Similarly, this project is unlikely to induce significant alterations in the pattern and type of land use.

Irreversible and Irretrievable Commitment of Resources: Fuels, materials, and various forms of energy will be utilized during construction.

Nondiscrimination: All programs, projects, and activities undertaken by DNR in the SRF programs are subject to federal anti-discrimination laws, including the Civil Rights Act of 1964, section 504 of the Rehabilitation Act of 1973, and section 13 of the Federal Water Pollution Control Amendments of 1972. These laws prohibit discrimination on the basis of race, color, national origin, sex, disability, or age.

POSITIVE ENVIRONMENTAL EFFECTS TO BE REALIZED FROM THE PROPOSED PROJECT

Positive environmental effects will be improved treatment of the wastewater from the City of Luana, compliance with effluent discharge permit limits, reduced discharge of the pollutants and nutrients to the receiving stream, and improved water quality in the receiving stream.

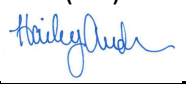
SUMMARY OF REASONS FOR CONCLUDING NO SIGNIFICANT IMPACT

- The project will not significantly affect the pattern and type of land use (industrial, commercial, agricultural, recreational, residential) or growth and distribution of population.
- The project will not conflict with local, regional or State land use plans or policies.
- The project will not impact wetlands provided the terms of the permit are abided by and mitigation completed.
- The project will not affect threatened and endangered species or their habitats provided that any tree cutting is conducted between October 1 and March 31 to avoid impacting endangered bats. If any State- or Federally-listed threatened or endangered species or communities are found during the planning or construction phases, additional studies and/or mitigation may be required.

- The project will not displace population, alter the character of existing residential areas, or convert significant farmlands to non-agricultural purposes.
- The project will not affect the 100-year flood plain provided all necessary floodplain development permits, state and local, are obtained and the terms of which are abided by.
- The project will not have effect on parklands, preserves, other public lands, or areas of recognized scenic or recreational value.
- No historic properties will be adversely affected by the proposed project. However, if project activities uncover any item(s) that might be of archaeological, historical, or architectural interest, or if important new archaeological, historical, or architectural data should be encountered in the project APE, the applicant should make reasonable efforts to avoid further impacts to the property until an assessment can be made by an individual meeting the Secretary of the Interior's professional qualifications standards (36 CFR Part 61).
- The project will not have a significant adverse effect upon local ambient air quality provided the applicant takes reasonable precautions to prevent the discharge of visible emissions of fugitive dusts beyond the lot line of the property during the proposed project (567 IAC 23.3(2)"c").
- The project will not have a significant adverse effect upon local ambient noise levels, surface water quantity, groundwater quality or quantity, or water supply.
- No significant impact to surface water quality, fish, shellfish, wildlife, or their natural habitats is expected provided that an NPDES General Permit Number 2 (for storm water discharge associated with construction activities) is obtained and the terms of which are abided by.

THEREFORE:

The above project conforms to the criteria in 567 Iowa Administrative Code 92.8(1)"b" for wastewater relating to compliance with the National Environmental Policy Act of 1969. This Environmental Assessment Document (EAD) outlines the justification that the environmental review for the proposed project should be classified as a Finding of No Significant Impact (FNSI) and does not rise to the significance of an Environmental Impact Statement (EIS) in accordance with 40 CFR § 1501.5.



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Hailey Andersen
Environmental Review Specialist
State Revolving Fund
Iowa Department of Natural Resources

PARTNERSHIP WITH THE IOWA FINANCE AUTHORITY
AND THE IOWA DEPARTMENT OF NATURAL RESOURCES

USGS Topographic Map

3-Cell Controlled Discharge Lagoon System
Luana, Iowa

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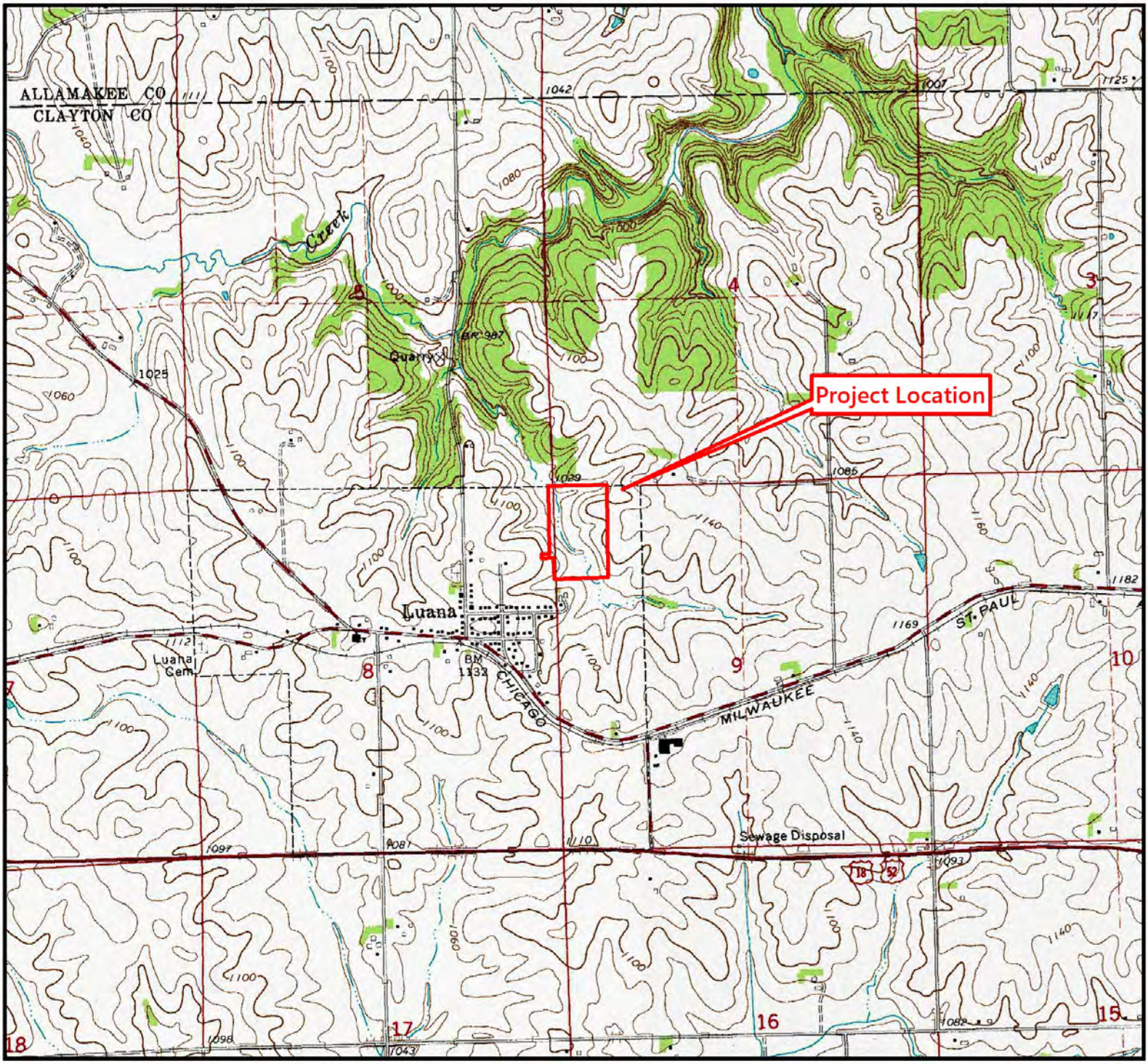

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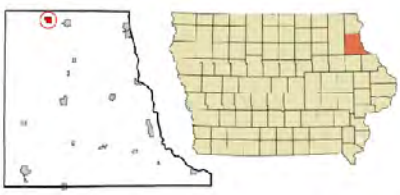


Clayton County. Image source: Wikipedia, 2024.

USGS 7.5 Minute Quadrangle: Monona
Section: 08, 09, Township: 95 N, Range: 05 W
Date: 1971

PARTNERSHIP WITH THE IOWA FINANCE AUTHORITY
AND THE IOWA DEPARTMENT OF NATURAL RESOURCES

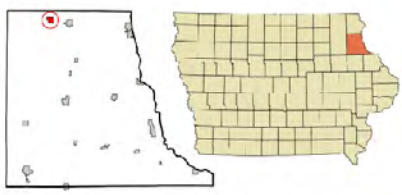
USGS Topographic Map

3-Cell Controlled Discharge Lagoon System
Luana, Iowa

N

Scale: 1 inch = 250 feet

0 125 250 375 500 625 Feet



Clayton County. Image source: Wikipedia, 2024.

USGS 7.5 Minute Quadrangle: Monona
Section: 08, 09, Township: 95 N, Range: 05 W
Date: 8.30.2023