



PUBLIC HEALTH

DATE: September 18, 2020
TO: Cerro Gordo County Board of Supervisors
CC: John Robbins, Cerro Gordo County Planning and Zoning
FROM: Daniel Ries, Cerro Gordo County Department of Public Health
SUBJECT: Manure Management Plan for River Edge Farms LLC

This report is being written to make you aware of concerns regarding an **annual update** Manure Management Plan received by this office from **River Edge Farms, LLC** swine operation. This report is being submitted according to Resolution 2003-123 **A Resolution Adopting Policy for the Receipt, Review and Comment on Manure Management Plans Received by the Cerro Gordo County Board of Supervisors**. Within seven (7) days of receipt of the manure management plan the Environmental Service Manager shall review the Manure Management Plan and prepare a report to the Board of Supervisors detailing the issues to be forwarded to the Iowa Department of Natural Resources.

The confinement operation is located at **2420 300th Street in Section 20 of Grant Township**. It consists of two buildings with below-building pits. The operation houses 4,992 hogs in the finish (market) stage and produces 1,202,572 gallons of manure annually. Twelve fields consisting of 1,380.69 acres are designated for manure application. Five fields totaling 640.74 acres are located in Cerro Gordo County. The Cerro Gordo County fields are located in Sections 19, 20, and 30 of Grant Township and Sections 29 and 30 of Lincoln Township. The operator indicates no changes have been made.

My main concerns with the plan are listed below:

- There are many public use areas in close proximity to the manure application areas: Haugen Wildlife Area (adjacent to Hancock County field), Kuhn Wildlife Area (adjacent), Wild Goose Marsh (adjacent), Teal Basins (3/4 mile), Sandpiper Hills (1½ miles), Winnebago Oxbow (1½ miles), Mallard Marsh (1½ miles), Prairie Pothole Wildlife Area (2 miles), King Fisher Hollow (one mile), Clear Lake Pond Wildlife Management Area (1½ miles) and Grant Township Cemetery (1½ miles).
- Oakridge 1st Addition and Oak Hills Country Estates Subdivisions are about 1½ miles from the manure application area.
- The north city limits of Clear Lake are about 1½ miles from the manure application area.
- The Winnebago River, a tributary from the south, a tributary from the north and their collective flood plains about the manure application area.
- A field in Hancock County contains HEL (highly erodible land).
- The Year-by-Year Summary sheets are not consistent with the maps; this assessment is based on the Year-by-Year Summary and would only change slightly if based on the maps. The total acres listed on the Year-by-Year Summary were miscalculated. The plan stated 1,227.41 acres and the actual acres were 1,380.69.

If you have any questions regarding this information feel free to contact this office at (641) 421-9338 or dries@cghealth.com.



PLANNING AND ZONING Cerro Gordo County Courthouse

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John Robbins, Planning and Zoning Administrator
Michelle Rush, Executive Assistant

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cgcounty.org/planning

December 2, 2020

TO: Board of Supervisors
CC: Daniel Ries, Senior Environmental Health Specialist
FROM: John Robbins
SUBJECT: Manure Management Plan Update for River Edge Farms, LLC

Gentlemen:

This office is in receipt of a Manure Management Plan update for River Edge Farms, LLC, for a confinement facility that was constructed 2017. It is located in the SE $\frac{1}{4}$ of the SW $\frac{1}{4}$ of Section 20, Grant Township (2420 – 300th Street). The plan states no changes have been made. The plan update from 2 years ago lists 12 fields totaling 1,227.41 acres on which manure will be applied for crop year 2020. 5 of the fields totaling 640.74 acres are located in Cerro Gordo County. These fields are located in Sections 19, 20, and 30 of Grant Township and Section 30 of Lincoln Township. The number of acres on which manure will apply remains unchanged from the previous year.

This is different than the 4-year plan originally submitted in 2017, which listed 22 total fields with 10 located in Cerro Gordo County with manure application occurring on all fields in each crop year. While these fields are formally listed with application rates and acres, all 22 of the fields are still mapped in the paperwork. One of the fields listed for Cerro Gordo County contain highly erodible land and is shown in red on the attached map. Additionally, manure will be directly injected into the soil instead of surface applied and incorporated into the soil. This is an improvement and makes runoff less likely.

Besides my concern with the inconsistencies from the previous plan, my concerns otherwise remain the same. The original report is below.

Original 4-Year Plan Report

Manure will be spread over 2,248.56 acres in 22 fields. Of the 22 fields, 10 of the fields, totaling 1,184.41 acres, are in Cerro Gordo County. These fields are shown with a yellow boundary on the attached aerial photo. One of the fields where manure is being spread in Cerro Gordo County contains highly erodible land. This field is shown in red. Manure will be spread on fields in Sections 19, 20, 30, 31, and 32 of Grant Township and in Sections 22, 29, and 30 of Lincoln Township during crop years 2017 through 2020.

Manure will be surface applied and incorporated within 24 hours. The number of fields on which manure is spread stays relatively the same, but which fields manure is spread on changes from year to year. The number of fields each year is as follows: 2017, 5 fields; 2018, 6 fields; 2019, 6 fields; and 2020, 6 fields. Application rates will range from 4,122 to 5,554 gallons per acre.

Flood Hazard Boundary Maps show that floodplains meander through the fields in Section 30 of Grant Township. Floodplains also abut the field in Section 19 and the westernmost field in Section 20 of Grant Township. There is concern about runoff into waterways since manure will be surface applied and incorporated within 24 hours. Contamination could occur if it rains between when manure is surface applied and it is incorporated into the soil.

The field in Section 30 of Lincoln Township is 1 ½ miles north of Clear Lake city limits and Clear Lake Pond Wildlife Management Area. King Fisher Hollow is about 1 mile north of the field in Section 22 of Lincoln Township. Kuhn Wildlife Area is located between and abuts the fields in Sections 19 and 20 of Grant Township. Wild Goose Marsh Wildlife Management Area abuts fields in Sections 30, 31, and 32 of Grant Township and is a ½-mile away from the fields in Section 20. Teal Basins Wildlife Management Area is a ½-mile northeast of the fields in Section 20 of Grant Township. Haugen Wildlife Area is a ¼-mile away from the field in Section 19 in Grant Township. Winnebago Oxbow and Grant Township Cemetery is approximately 1 ½ miles north-northeast of the fields in Sections 19 and 20 of Grant Township. Mallard Marsh, Sandpiper Hills Wildlife Management Area, and Prairie Pothole Wildlife Area are all between 1 ½ and 2 miles north of those same fields. There are approximately 60 residences within ½-mile of the fields on which manure is spread. Odor is likely to impact these public use areas and residences on days that manure is applied and prior to incorporation.

The fields in Section 29 of Lincoln Township and Section 30, 31, and the western field in Section 20 of Grant Township can be accessed from paved roads. All other fields can only be accessed from gravel roads. Damage could result to these gravel roads if manure is hauled over them after periods of wet weather or when frost boils are emerging.

Summary

Despite less fields listed, all of the field listed in the original Manure Management Plan are mapped as they were previously. It is unclear if they intend to apply manure on just 12 fields or all 22 from the previous report. My major concerns with the manure management plan are: (1) the application of manure 264 feet from a cemetery, (2) possible odor impacts on residences and public areas including public use areas in Thornton, (3) potential damage to gravel roads, and (4) the inconsistency from the previous plan though no changes were reported.

Attachment



2020 MMP Short Form for Annual Update

Facility

River Edge Farms LLC # 69070
2420 300th St
Ventura, IA 50482

Date Due:
09/01/2020

Date Received:
09/14/2020

Date Approved:
09/18/2020

Owner

River Edge Farms, LLC

Contact

Twin Lakes Environmental Services, LLC

Prior to making changes in manure management practices, update the on-site copy to show actual changes. Please select changes below and include all changes in your current, on-site MMP.

- Checked: I have made no changes to my MMP
Unchecked: I have added acres
Unchecked: Change Crop Rotation or Optimum Yields
Unchecked: Changed Application Method
Unchecked: Used manure analysis
Unchecked: I am electing to be a small animal feeding operation (SAFO) or facility capacity has changed
Unchecked: I have made other changes to my MMP Describe :

Empty rectangular box for describing other changes.

- Unchecked: I sell all manure with a Chapter 200A license through the Iowa Department of Agriculture and Land Stewardship.
Unchecked: In addition to selling manure as indicated above, I also apply manure to fields using a manure management plan.

County Notifications

The following counties have been notified:

Cerro Gordo

Animal Unit Capacity / Payment Summary

Table with 4 columns: Animal Type, Head, AUC, Amount (AUC * 0.15). Rows include Swine Grow to Finish and Total.

I, Becky Sexton, attest that the information indicated above is accurate and complete.

Comments

Empty rectangular box for comments.