

From: Klatt, Jeremy <jeremy.klatt@dnr.iowa.gov>
on behalf of Klatt, Jeremy <jeremy.klatt@dnr.iowa.gov>
<jeremy.klatt@dnr.iowa.gov>
To: Brian Jergenson
<brian.jergenson@dnr.iowa.gov>; Book, Kelli
<kelli.book@dnr.iowa.gov>; Joe Sanfilippo
<joe.sanfilippo@dnr.iowa.gov>
Cc: Trent Lambert
<trent.lambert@dnr.iowa.gov>
Bcc:
Subject: Re: Supreme Beef MMP Reviews
Date: Thu Nov 19 2020 08:32:31 CST
Attachments: image.png
image.png

Well - I took a look at the SDR (sediment delivery ratio) for these fields without terraces and Steve is correct, the SDR is not appropriate. There are 7 fields that look to be problematic - these 7 fields had a terrace credit taken in the initial submittal and, unfortunately, I must not have verified the SDR value after the terraces were removed.....

The SDR is a function of the landform region and the distance to the nearest stream - really quite difficult to mess that up and I'm not sure how Becky missed the mark so badly. But anyway - correcting these values is going to increase P index and is going to reduce application rates in these fields. I believe a couple of the fields might end up being >5 (i.e. no application allowed).

Practically speaking - it's not a huge deal since that basin is so huge I can't imagine they will land apply anything for at least a year (or two) and will probably be re-submitting a new NMP before they apply. But it's definitely not ideal since we approved the 2700 head based on the fields. Thoughts on how to proceed?

Jeremy Klatt | Environmental Specialist Senior

Iowa Department of Natural Resources

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On Tue, Nov 17, 2020 at 2:14 PM Klatt, Jeremy <jeremy.klatt@dnr.iowa.gov> wrote:

Brian -

I'll look into the issue he brings up about the 'Across the Road' field's SDR and get back to you.

Jeremy Klatt | Environmental Specialist Senior

Iowa Department of Natural Resources

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----- Forwarded message -----

From: Steve Veysey <sveysey@gmail.com>

Date: Mon, Nov 16, 2020 at 4:57 PM

Subject: Re: Supreme Beef MMP Reviews

To: Jergenson, Brian <brian.jergenson@dnr.iowa.gov>

Cc: Book, Kelli <kelli.Book@dnr.iowa.gov>, Larry Stone <Lstone@alpinecom.net>, Joe Sanfilippo <joe.sanfilippo@dnr.iowa.gov>, Jeremy Klatt <jeremy.klatt@dnr.iowa.gov>, Michael Schmidt <schmidt@iaenvironment.org>, Wally Taylor <WTaylor784@aol.com>, Jessica Mazour <jessica.mazour@sierraclub.org>

Hello Brian,

Thank you. I want to be as organized as possible when I send my formal questions. It may be a few days, since the weather forecast for later this week is telling me to go fishing.

I'm immediately concerned about the SDR values chosen in the P-Index equations for fields that are not claiming terraces. For those fields they use STF instead of SDR. (I have issues there as well). When I look carefully at Figure 2 in Iowa Technical Note 25 (attached), which is the rule referenced document in IAC 65.17(17) for nutrient management plans, the values I see for SDR for many of the fields (0.22, 0.23, et cetera) would seem to indicate that field centers are 10,000-20,000 feet away from the nearest perennial or intermittent stream; see page 3 of Technical Note 25, the paragraph about Sediment Delivery Ratio. I'm not sure ANY field in NE Iowa is 10,000-20,000 feet from surface water! The first field I checked in the plan (labelled "Across the Road") is only a few hundred feet from a stream. This would yield an SDR closer to 0.5 or 0.6, which would change the P-Index calculation significantly, and

might disqualify that field. See attached graph with red arrows indicating claimed SDR and distance to water, and green arrows indicating SDR if distance to water is 500 ft. I will fine tune this value in one direction or the other when I load the latest USGS NHD Plus HR stream coverage. The LIDAR image for the "Across the Road" field is from the DNR AFO Siting Atlas. Note the measured distance of about 600 feet from an intermittent stream directly connected to a perennial stream, Honey Creek. Note all the green dots, representing sinkholes in or near the field. This is a field where manure should be applied? Admittedly, I've not found an agronomist yet to review and check my observations, but that effort continues.

Regarding the field-specific inputs chosen by the submitter for the RUSLE2 and P-Index equations, particularly related to properly functioning terraces, I would refer you folks to the attached guidance document worksheet "Data Collection Worksheet for RUSLE2 and Iowa Phosphorous Index", ISU Extension Doc PM 2021. This protocol seems to be quite specific and quite appropriate considering what is at risk - Outstanding Iowa Waters. When Jeremy was working with Ms. Sexton from Twin Lakes Environmental regarding the proposed NMP fields, were these or similar worksheets presented or developed? If so, would those be available to me? Thanks.

Best Wishes,

Steve Veysey

On Mon, Nov 16, 2020 at 11:01 AM Jergenson, Brian <brian.jergenson@dnr.iowa.gov> wrote:

Steve,

The calculations for the fields in the accepted NMP were found to be adequate and acceptable. However, if you wish to send comments or observations feel free to do so at any time.

Brian Jergenson | Environmental Specialist Senior

Iowa Department of Natural Resources

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On Sun, Nov 15, 2020 at 12:27 AM Steve Veysey <sveysey@gmail.com> wrote:

Hello Brian,

Based upon emails I've looked at, it seems likely that Supreme Beef will be submitting a new MMP, subsequent to the October 7, 2020 revised MMP. Please let us know when you receive this MMP, as we may miss the notification in the local newspaper and would like to have the full thirty days to review the MMP and prepare public comments.

I've looked at the 13 fields listed in the 10/7/2020 MMP and do have some questions regarding the values used to calculate the erosion component of the P-Index for some of those fields. Would it be appropriate to ask those questions now, before manure is spread on them, or should I wait for the next public comment period? Thanks!

Best Wishes,

Steve Veysey

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Document ID: 0.7.1079.5045-000001

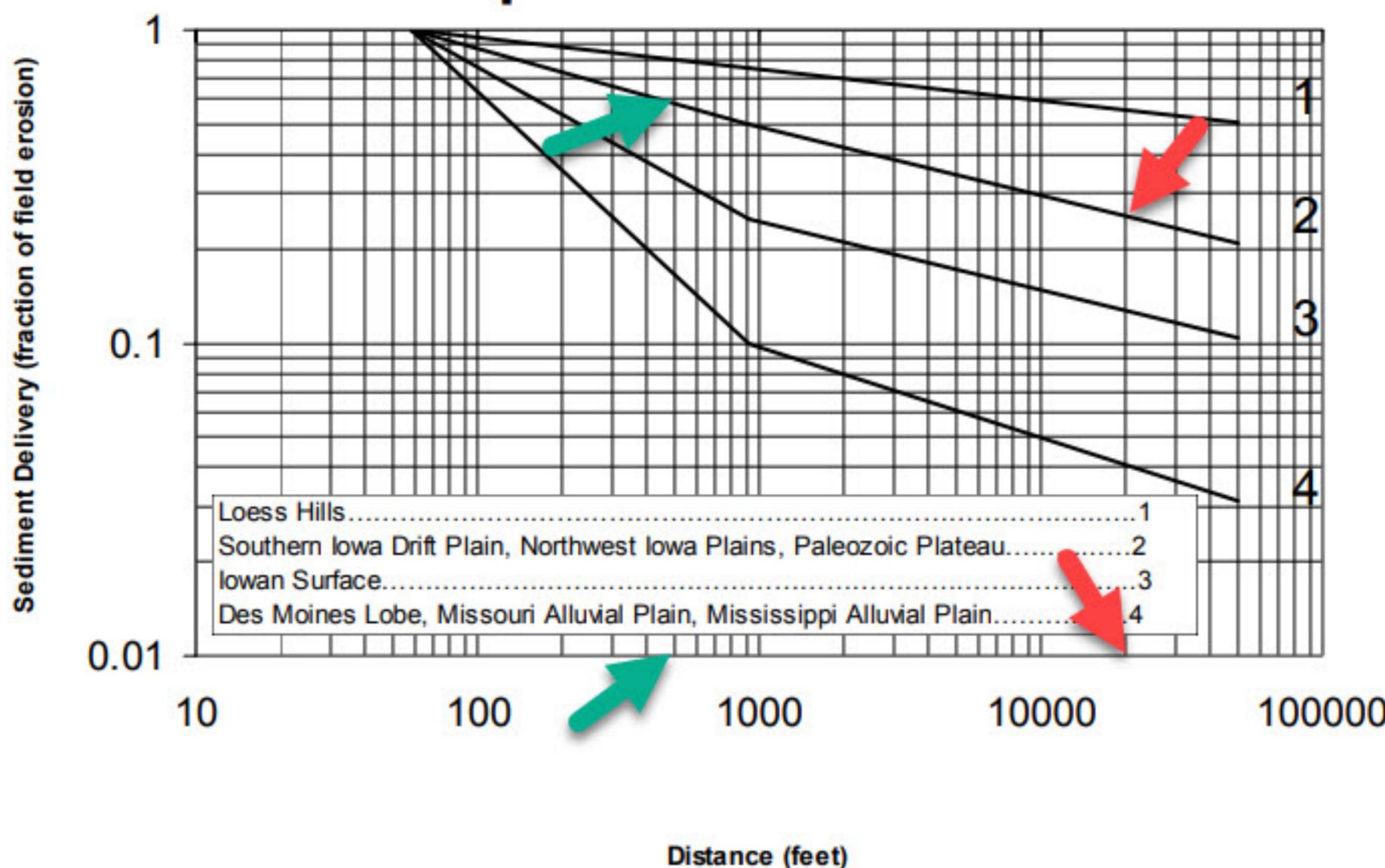
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Last Modified: Thu Nov 19 08:32:31 CST 2020

Figure 2, Sediment Delivery Ratio Factor

Sediment Delivery Ratios for Use in Phosphorus Index Procedure



Document ID: 0.7.1079.5045-000002

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[Map layers](#) [Legend](#)

- [AFO Siting Data](#)
 - [Sinkholes](#)
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 - [Wells](#)
- [Animal Feeding Operation](#)
 - [Active, Confined/Open](#)
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