



May 1, 2024

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Appleton, WI 54914

SUBJECT: Request for Additional Information, Ridge Breeze Dairy Nutrient Management Plan for WPDES Permit Modification

The Department has conducted their review of Ridge Breeze Dairy's nutrient management plan. The plan was received January 22, 2024 and was submitted by Michael Bucher, Auth Consulting & Associates, on behalf of Ridge Breeze Dairy. Below is a list of the Department's comments and requests.

RESTRICTION MAPS

1. There are discrepancies between stacking site locations and/or site names between the winter and non-winter spreading restriction maps and the provided stacking maps. Please provide cohesive maps of proposed headland stacking sites, and information regarding which manure source(s) would be stacked. Please note: All sites must comply with NRCS 313 (2005) Table 9 restrictions. Currently 6 sites appear questionable and none of the proposed sites would be allowable for manure with 16-32% solids content.
2. The spreading restriction maps appear to have a few areas where aerial imagery suggests flow paths that might affect the field but are not marked as concentrated flow and/or have not been marked with a SWQMA. Please confirm that these areas have been checked and have been appropriately marked.

APPLICATIONS AND CROPPING

1. Thank you for providing clarification regarding how manure nutrient content is planned, but the updated manure analysis still only includes values from 2023. Typically, we want to see five years of manure analyses unless the year provided has the highest nutrient content on record. Please provide a nutrient analysis that includes the additional years or a justification for why only one year is included.
2. The crop rotations have been improved, ensuring that none go further back than 2020, but the fields listed above still show a crop rotation that is short or primarily focused on past years:

• 04-02-001	• 04-02-007	• 04-02-033	• 04-02-099
• 04-02-002	• 04-02-008	• 04-02-034	• 04-02-100
• 04-02-003	• 04-02-012	• 04-02-039	• 04-02-101
• 04-02-004	• 04-02-013	• 04-02-053	• 04-04-005

Please note: There are also still places where the seeding years for alfalfa are not included, but several years of alfalfa in the past are shown in the crop rotation. **The nutrient management plan must show a realistic crop rotation for all fields, one that looks forward through the upcoming permit term.** Please update the crop rotations to ensure that they capture a full crop rotation, including alfalfa seeding or reseeded, and that several future years are captured in the report period, and provide an updated 590 Assessment and Compliance Check to show the updated crop rotations and confirm that the adjusted plan does not have any compliance issues flagged by SnapPlus.

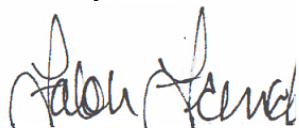
3. There are subsurface applications of 20,000-25,000 gal/acre planned for several fields. 25,000 gal/ac is a higher rate than is typically applied through an injection system. Please confirm in writing that those planned rates are accurate, and that Ridge Breeze Dairy has access to the proper equipment to successfully inject at those application rates. If manure rates and/or methods of application are adjusted, please provide updated Sorted by Crop reports as well.
4. The Sorted by Crop reports have been provided for 2023-2027. Since many of the fields have crop rotations that go through 2028 or 2029, please also provide those two years of reports.

The department requests that you provide the requested updates to the nutrient management plan by May 19, 2024. This deadline has been established to ensure that a full review of the plan can begin in a timely manner.

Feel free to contact me at (608) 228-5265 or Falon.French@Wisconsin.gov with any questions related to the Department's review. Please note that information regarding nutrient management planning and Chapter NR 243, Wisconsin Administrative Code, is available on the Department's website at <https://dnr.wisconsin.gov/topic/CAFO/NutrientManagementPlan.html>.

Thank you for your cooperation.

Sincerely,



Falon French
WDNR CAFO Intake/Nutrient Management Specialist

cc: Nathen Nysse, Tilth Agronomy Group (nathen@tilthag.com)
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