

RESTRICTION MAPS

1. There are discrepancies between stacking site locations and/or site names between the winter and nonwinter 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.

The sites approved have been added to individual maps. Manure stacking is only for above 32% solids that are produced from the separator system located at the operation. These maps are attached using a field name and Stacking Site notation.

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.

All fields have been reviewed and will be reviewed before all applications by the dairy to ensure that concentrated flow or SWQMA have been accurately depicted. A few maps have been updated working with the Pierce County LCD office. Maps 24,28 and 33 are attached.

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.

The Breeze Group purchased Son Bow Farms dairy in the fall of 2022. Tilth Agronomy has worked with Ridge Breeze Dairy for the 2023 year. The manure samples collected thru the growing season are being used to average the manure since this is the extent of manure samples that were available. Older samples were not received so Tilth Agronomy used the current data to create the average for the plan. As manure samples are collected these will be used to create a running average as normally provided for the farm.

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 • 04-02-002 • 04-02-003 • 04-02-004 • 04-02-007 • 04-02-008 • 04-

02-012 • 04-02-013 • 04-02-033 • 04-02-034 • 04-02-039 • 04-02-053 • 04-02-099 • 04-02-100 • 04-02-101 • 04-04-005 **All of these fields have been updated to reflect a 2023-2028 crop rotation. The rotation that the planner was using was an actual basis to make sure that the fields were meeting T or Tolerable soil loss with current data.**

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 reseeding, 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.

Several fields will remain in permanent grass and will never have a seedling year. This is planned based on the plans of the cooperating grower and the individual fields are reflecting the plans. Other fields have had a seedling year included.

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. **Ridge Breeze Dairy has access to several toolbars and will use several different toolbars to ensure manure is applied and retained on a given field. Rates planned are based on the actual equipment that will be used. I have added a brochure for a general tool which shows the capacities that a subsurface toolbar can apply to the soil.**



PHANTOM 2 INJECTION UNIT

The Phantom 2 Injector Unit is Bazooka Farmstar's enhanced liquid manure injection unit, designed for longevity, little to no in-season maintenance, and easy-to-replace wear parts. They provide maximum performance with minimal soil disturbance.

- Rolling coulter no-till liquid manure injection unit
- Rugged components for consistent performance, season after season
- Little to no in-season maintenance
- Apply and cover 2,500 up to 20,000 gallons per acre
- Available on Titan toolbars and standard tanks bars
- Phantom Edge Upgrade for up to 25,000 GPA

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.

Rotations were adjusted to either one of the following. A. 2022-2027 or B. 2023-2028. Anything that was outside these dates was reduced in length. I have included a Sorted by Report for the 2028 crop year since that is the extent of the rotations.