



September 23, 2014

Mr. Ken Hessenius
Iowa Department of Natural Resources
1900 N Grand Ave.
Suite E17
Spencer, IA 51301

Dear Mr. Hessenius:

The Dickinson County Supervisors are writing in concern with the proposed manure management plan for a confined feeding site in Okoboji Township in Dickinson County. As a matter of policy set in 2003, Dickinson County holds a public hearing on new and renewal plans taking place in the County. The Board of Supervisor's agenda of September 9, 2014, included the "Public Hearing for a Manure Management Plan for a confined feeding operation owned by Tom Kaiser in the SW 1/4 of SE 1/4 of Section 21, Okoboji Township". At the request of the public for those that could not attend on the 9th, the hearing was continued to the following Monday evening at 7:00 P.M. Between the two sessions, the Supervisors heard the concerns of more than 140 residents. Below you will find both facts related to the Manure Management Plan for a confined feeding operation and concerns also related.

FACTS:

- There are 1151 dwellings in the area within a 5-mile diameter of the proposed site. (*Attachment #1*)
- According to the 2010 census, there are 3,795 people living within those 1151 housing units.
- Sixty-three (63) of these homes lie within 2.64 miles directly north of the site with an assessed value of \$14,433,700. (*Attachment #2*)
- The Milford city limits are 3.9 miles to the northeast of the proposed site. (*Attachment #1*)
- The Confinement operation is planned to be located on a County level B road which will require the County to upgrade and provide ongoing maintenance and snow removal which does not exist at this time.
- Dickinson County relies on Tourism, Iowa Great Lake activities, Businesses & Agriculture to generate revenue to operate. With that, **Dickinson County is the number one Iowa rural county** in generating tourism dollars, related businesses and related jobs. (*Attachment #3*)
- There are three (3) County owned properties intended for public activities within two and a half (2.58) miles of the proposed confinement location. (*Attachment #4*)
 - Horseshoe Bend Park is located 0.08 miles from the nearest manure injection site and the confinement.
 - Milford Woods is 2.58 from the site
 - Judd Wildlife Area is .64 miles from the site.
- The DNR has told Dickinson County that they will be issuing the approval letter for this operation and construction can start any time after October 8, 2014.

- The confinement site will be approved for up to 2,400 animals at one time.

CONCERNS expressed by the public and by Dickinson County:

- Health - Air Quality & Water Quality issues as related to confinement locations including Pathogens, antibiotics & flooding causing effluent to run over ground.
 - There are many children living in the vicinity of and/or visiting Horseshoe Bend that could be affected by a negative air quality. Many school activities take place at the Park as well as recreational activity year around.
 - Of Dickinson County's non tourist population (16,955), 23.4% are over 65 and more vulnerable to negative air and water qualities. 23.4% is nearly 9% higher than overall Iowa. (*Source – State & County Quick Facts, US Census Bureau*)
- Loss of tourism dollars – Arnold's Park Amusement Park is approximately 6.51 miles northeast from the proposed site. Annual visitation to the amusement park alone is estimated to be over 299,700, producing over 1.7 million tourism dollars.
- Loss of property taxes – there are lots of reports and studies related to reduction in property values which ultimately is a loss in property taxes. Refer to the property values within just 2.64 miles north of the proposed site. Attachment 2
- Possible expansion of the operation means more exposure -
The Manure Management Plan states that a maximum of 2400 animals will be confined at a time with an estimated 993,600 gallons of total manure produced by these 2400 animals. However, the estimated annual production for the facility will be 6000 animals and approximately 2,484,000 gallons of manure produced annually. It is important to emphasize that the permit allows 2400 animals per confinement and not per designated area, meaning that additional confinements will be able to be built with no future regulation as long as a revised manure management plan is submitted.

As the Department of Natural Resources is well aware, Dickinson County relies on agriculture, industry and tourism to promote our economic well-being. For decades, these economic forces have worked in harmony such that Dickinson County is today one of the fastest-growing and most economically stable regions in the state. We do, however, sense a conflict between animal confinement operators, appliers of manure, and local citizens concerned about the quality of life we offer to our residents and to the thousands of visitors we enjoy.

As you also know, the Master Matrix does little to address concerns over odor and air pollution incidental to the operation of animal confinement facilities and the spread of manure generated by those facilities. While we are conscious of the fact that we remain a rural county, with agriculture as an essential component of our success, we are nonetheless confronted more and more frequently with conflicts between these elements that we feel the DNR is powerless to control.

The purpose of this letter is to express our frustration that the current laws and regulations do not adequately address the need for environmental control by the DNR in matters of this nature.

Given the above facts and concerns, we as a Board of Supervisors question the wisdom of applying manure in this area along with the location of the confinement. However, we have been advised by the DNR

that Mr. Kaiser has met all of the requirements as set forth by the Legislature and enforced by the Iowa Department of Natural Resources and therefore will be allowed to go forward with all sites listed in his application. The Board of Supervisors does, however, wonder if this isn't a case of "just because it's legal, is it the right thing to do"?

With that thought and the facts and concerns listed above, the Dickinson County Board of Supervisors respectfully request the DNR to reconsider and deny the application from Mr. Tom Kaiser and work with Mr. Kaiser to find a more suitable location for his confinement operation and manure management plan.

With Sincere Concern from the Dickinson County Board of Supervisors,

David Gottsche
Chairman of the Board

William Leupold

Mardi Allen

Paul Johnson

Pam Jordan

Enclosures: 4

Cc: Mr. Tom Kaiser