



August 8, 2017

Director Chuck Gipp
Iowa Department of Natural Resources
Wallace State Office Building
502 East 9th Street, 4th Floor
Des Moines, Iowa 50319-0034

Dear Director Gipp,

Please accept this correspondence as our letter of support for the rulemaking petition filed on July 18th, 2017 by Iowa Citizens for Community Improvement and Food and Water Watch to strengthen the master matrix. We strongly encourage the Department of Natural Resources (DNR) to move forward with the petition and make rule changes to strengthen the master matrix.

Now fifteen years old, the master matrix has failed to fulfill its promise of giving counties and citizens a greater voice in the permitting process for confined animal feeding operations (CAFOs) and more protections from the pollution they create. As supervisors, we have very little power to weigh in on facilities that may pose significant risks to our constituents, our environment or the economics of Dickinson County.

We spend significant time and energy reviewing master matrix applications, but it is so easy to pass that this is largely a wasted effort. Applicants only need 50 percent of the available points – an “F” by most standards – to pass the master matrix, and DNR records show that only 2.2 percent of applications have been denied. DNR’s own analysis of past master matrix applications demonstrates that it is not leading operators to take meaningful steps to prevent pollution, because these best practices are not needed to obtain a passing score.

The legislature has set the animal units required to use the Master Matrix too high. They have failed to address this Matrix issues or give counties true local control over the siting, approval, or denial of CAFOs. As a result, DNR should use its authority to make changes to strengthen the master matrix outside of the legislature. DNR has the responsibility of creating and enforcing meaningful rules to hold this industry accountable and protect Iowans. The master matrix is the only tool we, as supervisors, have to weigh in on CAFO construction, and we call on you to make it as strong as possible. The petition for rulemaking lays out a roadmap for common sense, necessary DNR action, and we urge the agency to grant it and propose stronger regulations without delay.

Respectfully submitted,
Dickinson County Board of Supervisors


William Leupold, Chair

cc: Governor Kimberly Reynolds