

Iowa Citizens for Community Improvement Talking Points for Recommended Revisions to Iowa's Proposed Chapter 65 Rule Change Regarding Factory Farms

CCI's FIRST Demand

In recent years, the DNR has measured separation distances for expanding factory farms by measuring from the nearest corner of a structure (for instance, a house, business, etc.) to the nearest corner of the new factory farm building – even if the *existing* factory farm building is closest. This *must* be revised so that separation distances are measured from the nearest corner of the factory farm to the nearest corner of another structure.

CCI's SECOND Demand

Factory farms that are just under the permitting threshold continue to build one right next to another under different LLCs. They do this to skirt around permitting laws. It's time the DNR close this LLC loophole and regulate these factory farms just like any other factory farm that houses 2,500 hogs or more.

CCI's THIRD Demand

In 2012, Iowa DNR and Prestage Farms told CCI member JoAnn that her business wasn't considered a "commercial enterprise" because it wasn't open in the winter. This meant the factory farm could build closer to her than if they ruled it was commercial enterprise. But this is Iowa: we have harsh winters, and lots of Iowa businesses close down in winter, like landscape companies, vacation resorts, and ice cream shops. DNR must expand its definition of a commercial enterprise to make sure all of Iowa's family-owned businesses are protected from factory farms.

CCI's FOURTH Demand

Factory farm operators are trapped in a corporate animal agriculture system created by corporate ag. The contracted factory farmer takes on nearly all the liability, while the corporate integrator takes most of the profits. DNR must change the rules so that integrators are liable for manure spills, violations, etc. – not just the contracted factory farm operator.

CCI's FIFTH Demand

DNR must expand what is classified as a "public use area." Right now, only infrastructure surrounding lakes, like shelters and docks, are protected from factory farm pollution. But the lake and its shoreline should also be protected.

CCI's SIXTH Demand

The DNR and factory farmers can request an extension on applications, but County Board of Supervisors cannot. This must change: counties should be allowed extensions just like the developer and DNR in order to have time to review the Master Matrix and Manure Management Plan. Most of the time, people don't find out about incoming factory farms until it's too late.

CCI's SEVENTH Demand

We need transparency of factory farm records. The name, mailing address, and phone number of the facility owner and integrator company should remain on the Manure Management Plan.

CCI's EIGHTH Demand

DNR must assess fines for violations in order to hold factory farms accountable. *All* violations of manure management plans, illegal discharges, and other non-compliance should be a minimum fine of \$5,000.

CCI's NINTH Demand

Citizens are finding more and more Manure Management Plans that do not account for 100% of Nitrogen. Iowa has a major problem with too much Nitrate in our water. Manure Management Plans *must* account for 100% of Nitrogen.

CCI's TENTH Demand

Factory farm records must be made available to DNR upon request, including during an unannounced inspection, and to the public in response to a public records request. Manure Management Plans can change at any time without notifying the DNR until after the change, and this makes public audits, inspections, and accountability difficult.

CCI's ELEVENTH Demand

A small operation cannot store the same amount of manure produced by a medium or large factory farm.