IDAHO STATE DEPARTMENT OF AGRICULTURE

CAFO SITE ADVISORY TEAM

May 2, 2022

Joe Merrick,
Chairman
Owyhee County Board of Commissioners
Courthouse P.O. Box 128
Murphy, ID 83650-0128

RE: CAFO Site Advisory Team Review Report of Reynolds Creek Calf Ranch

The Idaho State Concentrated Animal Feeding Operation (CAFO) Site Advisory Team has completed its review of the proposed Livestock Confinement Operation expansion of Reynolds Creek Calf Ranch located at 12971 Bailey Road, Melba, ID 83641. The facility is proposing to increase from the current 35,000 animals to approximately 55,000 animal heads. The review was completed in response to a request made by Owyhee County in accordance with IDAPA 02.04.30, subchapter B.

The Team, consisting of representatives from the Idaho Department of Environmental Quality (IDEQ), Idaho Department of Water Resources (IDWR), and the Idaho State Department of Agriculture (ISDA) performed a site evaluation on April 27, 2022.

The information evaluated for this facility included the application package provided by Owyhee County, IDWR ground water information and water right records, IDWR Statewide Ambient Ground Water Quality Monitoring Program network data, IDEQ map and data, ISDA Regional Agricultural Ground Water Quality Monitoring Program data, Natural Resources Conservation Service soil data, well driller reports, discussions with county officials and the owner, and an onsite evaluation by the team.

According to IDAPA 02.04.30, subchapter B, the CAFO Site Advisory Team is required to provide a site suitability determination that includes:

- **Risk Category.** A determination of an environmental risk category: high, moderate, low; or insufficient information to make a determination.
- **Description of Factors.** A description of the factors that contribute to the environmental risks.
- **Mitigation.** Any possible mitigation of the environmental risks.

I. Risk Category

The following determination is based on the information supplied to the team through the county and site-specific conditions at the time of the site visit. However, information used for evaluating the ground water, geology, and soils may be based on regional information and may not fully characterize the local conditions of the specific facility.

The Environmental Risk, as determined by the CAFO Site Advisory Team, is **Moderate Risk.**

Any changes or modification in the application or at the site may alter the Environmental Risk. Risk is determined through a point-based scoring system (attached) that utilizes and accounts for a combination of environmental factors. Management and mitigation are not factored into this determination; it is a physical characterization of the site only.

II. Description of Factors

The Environmental Risk is based on physical characteristics of the site. The following technical factors contributed to the environmental risk rating:

High Risk Factors

- Dominant soil texture in the area is sandy loam with a high saturated hydraulic conductivity of 2-6 inches per hour.
- The percentage of wells over 5 mg/L of nitrate within a 5-mile radius is 45%.
- Downgradient surface water bodies, specifically irrigation ditches and an ephemeral drainage, border or intersect the facility and its land application fields.

Moderate Risk Factors

- The average soil depth in the area is generally 60 inches.
- Average depth to first encountered water within a five-mile radius is 69 feet.
- The mean nitrate level in groundwater within a 5-mile radius is 4.6 mg/L.
- The time of travel to the nearest downgradient spring is 3 to 10 years.

Low Risk Factors

- Clay layers in the unsaturated zone are greater than 25 feet thick.
- The aquifer geology is primarily comprised of fractured clay and sandstone.
- Distance to the closest downgradient domestic well is greater than 1,000 feet.
- The CAFO site is not located within a source water delineation area.
- The CAFO site is not within a 100-year floodplain.
- Surface run-on potential to the CAFO site is minimal because the site slope is shallow with minimum run-on potential.
- Surface runoff potential from the CAFO site is minimal because the site slope is shallow and the soils have a higher saturated hydraulic conductivity.
- The average annual precipitation is approximately 9 inches.

III. Mitigation

The CAFO Site Advisory Team's environmental risk assessment process is focused on water quality.

The facility will operate as a licensed CAFO. ISDA has regulatory jurisdiction over the facility per IDAPA 02.04.15 Rules Governing Beef Cattle Animal Feeding Operations. The Nutrient Management Plan will be modified if/when the facility expands to accurately reflect the current operation. The footprint of the animal housing waste containment area will increase if the County approves the proposal. In the event that the county approves the proposed expansion, the waste system improvements/modifications will need to take place, prior to the increase in animal units.

Other Best Management Practice recommendations include:

- Care should also be taken to prevent solid waste products and solid waste storage area runoff from entering surface water bodies, or ponding and entering the ground water. The facility should ensure appropriate setback distances as listed in IDAPA 02.04.30 subchapter D "Stockpiling of Agricultural Waste" from the stockpiling of solid waste to any domestic or irrigation well or down-gradient surface water of the state of Idaho.
- Care should be taken when applying solid waste/manure to the facility-controlled fields to ensure that runoff does not occur as a result of a weather event. Timely incorporation of solid manure applications into the soil will also assist in minimizing runoff potential. Also, animal manure should be incorporated into the soil prior to irrigation and ideally within 72 hours of application.
- Standing effluent in corrals and unapproved low areas of the facility should be transferred to an ISDA approved structure immediately.

IV. Additional Information

Owyhee County may issue "special use conditions" in their permit to the applicant. Special use conditions, if not required by existing State or Federal law, would be the county's responsibility to enforce.

CAFO operations require stock water and/or commercial water rights. A review of IDWR records indicates the operation has appropriate water rights.

Facilities that employ chemigation systems must have those systems inspected and approved by ISDA prior to use. Additionally, approved backflow prevention must be in place to prevent back siphoning of wastewater into the aquifer or irrigation laterals/canals.

The CAFO Site Advisory Team did not:

- Review any information regarding air quality. For a more specific evaluation of air quality concerns, please contact the regional IDEQ office.
- Evaluate any increase in the number of lights or light pollution due to the expansion.
- Evaluate the roads in the local area. For a more specific evaluation, please contact the county highway district or the Idaho State Department of Transportation.

The site suitability determination is based on the information supplied to the team from the county and site-specific conditions at the time of the evaluation. This assessment does not consider practices not described during the site visit.

The following individuals were present at the CAFO Site Advisory Team evaluation. The names depicted in bold type are the individuals responsible for the suitability determination.

1. **Pradip Adhikari**, Soil Scientist, ISDA
2. **Adam McMahon**, IDEQ, Hydrogeologist
3. **Gus Womeldorph,** IDWR, Hydrogeologist
4. Bob Ohlensehlen, O & H Associates
5. Mary Huff, Owyhee County Planning Director
6. John Hepton, Facility Owner
7. Jared Gould, Facility Owner
8. Jeff, Facility Site Manager

If you require further information regarding this site determination, please feel free to contact us.

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ATTACHMENTS

1. CAFO Site Advisory Team Environmental Risk Form
2. IDEQ produced map (including animal units in the area, public water systems, residential wells, irrigated acres and population)