

This document summarizes the EAQ for Daybreak Foods, Creekwood. The original EAQ was submitted in 2017. Upon review of the submittal, the WDNR sent requests to the farm for additional information in some areas. These requests are written below each question in blue. In response to the requests, the farm submitted new answers in some areas. The revised answers submitted by the farm are written below each requested revision. For answers that refer to attached documents, the location of these documents is written in red.

ENVIRONMENTAL ANALYSIS QUESTIONNAIRE

Livestock Operations

Operation Name:

*Daybreak Foods, Inc.
Creekwood*

Contact Person:

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Operation Legal Location:

*Section 27, T7N, R13E
Lake Mills Township
Jefferson County, Wisconsin*

Operation Mailing Address:

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PO Box 800
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PROJECT SUMMARY

1. Please attach the following maps and/or scaled drawings which clearly identify the location of the proposed operation:
 - a. Plat book map (Page 22)
 - b. Soils map (Page 23)
 - c. Wetland map (Page 24)
 - d. USGS Topographic map (Pages 25-26)
 - e. Site development drawings locating: surface waters, water supply wells, property boundaries, and other pertinent information. (Pages 27-28)

See attached maps.

Requested Revision: Provide updated maps.

Response: See attached maps. (updated maps located on pages 29-32)

2. Please provide a brief overview of the project:

a. Is this a proposal for a new operation, or an expansion of an existing site?

Creekwood is an existing layer and pullet facility. The existing site is planned to be modernized beginning fall 2017 through 2020 by constructing three to four new pullet buildings on the west side of the existing parcel along with a dry manure (fertilizer) containment building.

Contiguous property east, across Crossman Road, is planned to be purchased and five cage free chicken barns are planned to be constructed along with a dry manure (fertilizer) building, and an egg grading and breaking plant.

b. What are the existing site's characteristics (include buildings, manure storage facilities, runoff control systems, etc. on site)?

See the attached maps.

The proposed pullet building area is cropland although old pullet buildings will be removed on adjacent land to accommodate the pullet buildings and dry manure (fertilizer) storage building. Site runoff drains east to an adjacent wetland or west to a farm ditch.

The cage free layer operation, dry manure storage building, and egg process building are proposed on land across Crossman Road, east of the existing operation,. The proposed Layer site is generally farmland, but includes a barn and home. Stormwater drainage is generally to the east.

c. What changes will be made at this site? Fully describe what kind of buildings, access roads, manure storage structures, feed storage structures, etc., are to be constructed. Please include size of structures (miles/feet of road, volumes to be stored, etc.)

The proposed plan includes three to four new pullet buildings on the west side of the existing parcel along with a dry manure (fertilizer) containment

building. The proposed pullet barns are planned to be about 120 feet wide and 612 feet long to house about 200,000 pullets each. The pullet age is from one day old chicks reared to 17 to 19 weeks of age. A manure storage barn about 120 feet by 600 feet with 16 foot high concrete walls or remodeled existing compost buildings will be used for dry manure (fertilizer) storage. Approximately 3000 feet of access roads would be provided for access. Initial detailed plans will be prepared as planning progresses.

The proposed cage free layer operation, dry manure storage building, and egg process building are proposed on land across Crossman Road, east of the existing operation. Five layer buildings are proposed with dimensions of approximately 612 feet by 120 feet and will house approximately 400,000 birds in each building (two-200,000 flocks per building). The dry manure building is planned to be approximately 840 feet long by 120 feet wide. The egg process building will be approximately 250 feet by 200 feet. Approximately 4,000 feet of access roads are proposed. A pipeline from the proposed egg process building to the existing and expanded egg wash basins will be proposed once building layout is finalized. The existing grain storage and feed mill plant is planned to be modernized, and as the site development progresses a new feed mill will likely be constructed at the new layer operation.

Requested Revision: Explain the eggwash process, including “eggwash water” in layman’s terms. Provide information on the total additional impervious surface and a description the proposed facility’s runoff control systems. (Note: owing to the agricultural facilities exemption in NR 151.121(b), it’s not clear what if any performance standards would apply.)

Response: The plan begins by including three new pullet buildings on the west side of the existing parcel. The new barns replace two older pullet barns. The pullet barns are about 90 feet wide and 457 feet long to house about 200,000 pullets each. The pullet age is from one day old chicks reared to 16 to 18 weeks of age. Approximately 3000 feet of access roads will provide for site access at the pullet site.

In addition to the three new pullet buildings, a new biosecurity building that includes truck disinfection and employee shower in/out facilities will be constructed at the pullet site entrance off of County Highway A.

The proposed cage free layer operation, dry manure storage building, biosecurity and office facility and a new egg processing plant are to be located on land across Crossman Road, east of the existing operation. Five (5) layer buildings have dimensions of approximately 532 feet by 120 feet and house approximately 400,000 birds in each building (two-200,000 flocks per building). The layers typically are 16-17 weeks old when transferred to the layer barns and are in production for approximately 19 months

before being replaced. Approximately 4,000 feet of paved access roads are planned for the layer site.

The manure building stores dry manure from the layer and pullet flocks. The building is approximately 710 feet long by 220 feet wide. The waste storage facility (manure containment area located within the manure building) is approximately 565' long by 200' wide. The building can store approximately 231 days of manure (10.5 to 11 months) of dry manure from the operation, although manure will be removed on an ongoing basis as fertilizer.

A new main site administration office, biosecurity shower in/out facility and flock observation room are at the new main entrance to the layer site off of Crossman Road. This structure will be single story, 92' long by 77' wide.

The egg processing plant building is approximately 185 feet by 180 feet and is used to wash, package, break eggs for liquid, and refrigerate the eggs for transport. The egg wash-water consists of water from washing of the eggs as well as portions of the egg and CIP (Clean in Place) sanitation agents for the egg handling equipment, refrigerated tanks, tanker trucks and pipelines.

A holding tank pump station and pipeline from the egg process plant building is used to transfer process wastewater to the existing waste treatment system which includes a digester, aeration pond and process wastewater storage basin.

A new feed mill is located directly across (west of) Crossman Road from the new layer operation. The new feed mill will replace the existing feed mill that has reached its service life and needs replacement. A conveyor from the new feed mill will convey feed over Crossman Road to the new layer buildings eliminating feed truck traffic. Feed for the new pullet buildings will be trucked using a new paved road built completely on site to retain strong biosecurity.

Once the proposed new facilities are constructed and in full operation the nine existing layer houses, three existing compost buildings, existing feed mill and existing conventional pullet structure will be demolished and the land will be graded and grassed. The company is considering building a new equipment storage building somewhere on the site, possibly on the same portion of real estate that held the original compost buildings.

- d. What is the approximate timeline for construction? (When will construction be completed? When will the animal unit goals be reached?)

Earth work is planned to begin in the fall of 2017, with building construction anticipated to be completed in 2½ to 3 years. Layers from existing buildings

will phase out as new cage free buildings come on line. Cage free pullets are needed to populate the cage free layer operation so the pullet buildings need to be completed about 4 to 5 months before the first layer building is completed. Animal units will increase as new buildings are populated with full potential capacity in 2 ½ to 3 years.

- e. How much will traffic be increased during construction (short term) and/or as a result of increased transport of livestock, feed, milk, etc. (long term)? Describe any plans to address this increase in traffic.

Short term: Traffic will increase throughout the construction phase of the proposed project to transport building materials and construction equipment. Approximately 10 to 20 construction workers may be on site during an average day. Once various phases of several buildings are under construction simultaneously, additional concrete and steel erection crews may account for additional traffic. Ample on-site parking for crews, equipment and materials will be available to keep roadways from becoming congested.

Long term: Operationally, an increase in traffic will occur due to product and feed shipment and deliveries to the site. Long term traffic will increase with the expansion of additional employees. Approximately 25-30 trucks transporting liquid or shell eggs will be shipped out per week (usually 5 days per week). Approximately 6 loads of grain and associated feed mill products from local suppliers will be delivered per day. During a six week period in the spring and fall, additional truck traffic of 5-30 trucks per day will be experienced hauling fertilizer from the site.

3. Please discuss the purpose or need for this project.

The project purpose is to provide eggs from aviary cage free chickens to meet Consumer preference and Customer demand.

Requested Revision: Provide additional information on the need for the proposed new facility, including the current and anticipated trend in customer preference and demand, and why it can't be met on the current site.

Response: This Aviary Cage Free project is the direct result of the growing customer trend toward a Cage Free egg source in the United States. This will be one of the largest and most technically cutting-edge facilities in the world. Competitors are taking notice of the style of the aviary system, building design, materials and advanced systems being employed for use in future buildings.

The cage free system design affords more cubic inches per bird, segregated nesting spaces for egg laying and provides more lineal area of feed trough. The design therefore

requires an overall larger building footprint to accommodate the US standards for Aviary Cage Free. Simply put, this project's purpose is to provide eggs from aviary cage free chickens to meet Consumer preference and Customer demand. The current "conventional" pullet rearing and layer houses on the site do not lend themselves for conversion to Aviary Cage Free.

The cage free facilities cannot be constructed on the existing building site as production needs to be continued to meet commitments, therefore production cannot be stopped while existing buildings are demolished for new Cage Free buildings. Further the Cage Free buildings require a bigger footprint that would not fit on the existing site footprint and Jefferson County Livestock Siting setback requirements could not be met on the existing site. Therefore, Daybreak Foods purchased land adjacent to the existing Creekwood Facility to construct the Cage Free facilities.

4. Please provide the following: (from calculation sheet on Form 3400-25)

	<i>Current Status</i>	<i>Total After Expansion Completed Within 5 years</i>
<i>Animal Type(s)</i>	<i>912,000 layers 155,000 pullets</i>	<i>2,000,000 Layers 800,000 pullets</i>
<i>Number of Animal Units</i>	<i>9895</i>	<i>24,000</i>
<i>Products to be Marketed</i>	<i>12 trucks of eggs/ week</i>	<i>24 trucks of eggs per week</i>

Current and proposed animal unit calculation worksheets are enclosed.

5. Please estimate the project's cost. Include land preparation, animal housing buildings, feed storage, manure storage handling facilities, and livestock. Provide an itemized list of estimated costs.

- Land \$ 3.5 million
- Animal Buildings \$ 45 million
- Fertilizer Building \$ 2.5 million
- Feed Mill \$ 5.7 million
- Process Plant & Support Facilities \$ 8.3 million

Total \$ 65 million

6. Please list all local, state, and federal permits and approvals which are required for completion of the project. Refer to the enclosed 'Permit Checklist' and contact your

local and state government agencies to determine which permits/approvals will be required.

a. Town and County permits/approvals:

- *Sanitary Permit-County*
- *Manure Storage Building Permit-County*
- *Zoning and Siting Permit-County*
- *Driveway Permit-Town*

b. State and Federal permits/approvals:

- *Wisconsin Pollution Discharge Elimination Permit-WDNR*
- *Construction Site Erosion Control Permit-WDNR*
- *High Capacity Well Permit, DNR*
- *Food Processing Plant Design Approval – USDA/FSIS*

c. Will a floodplain or shore land ordinance variance be needed to complete the project? [Note: the floodplain is defined as the area for which there is a one percent or greater probability of being flooded in any given year. Contact your Zoning Administrator with any questions about whether these ordinances apply to your project area and whether a variance or project alteration is needed.]

No mapped floodplains or navigable waterways are on the project development site, therefore a floodplain or shoreland permit would not be needed for the project as there are

7. Please discuss soil excavation and disturbance:

a. Please estimate how much earth will be disturbed during construction of buildings, manure storage facilities, and other structures (please report in both cubic yards and acres, and include any construction that has already begun.)

Approximately 50 acres are estimated to be disturbed and 50,000 cubic yards of material will be disturbed as part of the project construction. An erosion control plan will be prepared for DNR approval.

b. For how many months will this disturbance occur?

The length of the construction at the farm expansion site is anticipated to be approximately 2 1/2 to 3 years. The site will be seeded upon initial grading, and will be graded and seeded as phases are completed.

c. Will any soil be stock-piled for future use? What is the source of any fill material?

Fill for the site buildings and roads will come from on-site grading, but much will come from off-site sources such as operating quarries with overburden. Offsite gravel will be brought in for construction of the access roads and parking areas. Topsoil will be stockpiled for future use on site.

- d. Will access roads need to be established (or have any already been established)?

Additional Access roads will be constructed from Crossman Road to provide access to the proposed east building site. Both sites have existing access roads which are planned to remain.

- e. Will the operation require coverage under a DNR WPDES stormwater construction permit? [Note: As of March 10, 2003, a WPDES stormwater permit is required for all projects that will disturb one acre or more. For agricultural operations, this does not include planting, cultivating, etc., but does include any building or construction projects. Before March 10, 2003, this permit is required for projects disturbing five acres or more.]

Yes, the site will disturb more than one acre. A DNR Stormwater Construction Site General Permit application will be submitted to the Department of Natural Resources for review and approval.

8. Please discuss manure production on site and associated impacts:

- a. Please estimate the amount of manure that will be produced on site annually (in tons for solids and gallons for liquids), and report that amount here. [Note: The attached worksheet can be used for this estimation, but is not required.]

It is estimated that the facility will produce 50,000 tons of solid manure and 8,000,000 gallons of wastewater annually. The manure is planned to be composted and sold as a solid organic fertilizer to Midwest Bio-Ag. The wastewater is planned to be stored in existing or expanded storage basins or land applied as outlined in the Nutrient Management Plan.

- b. Estimate the total pounds of nitrogen and phosphorus that will be produced annually.

50,000 tons of solid manure will provide about 2.5 million lbs. N; 1.9 million lbs. P₂O₅; and 1.2 million lbs K₂O. These values are based on manure analyzed from similar operations.

- c. Report how much acreage is currently owned, and how much is rented for land spreading. After the proposed construction/expansion, what will the owned and rented acreage be?

Compost is contracted by Midwest Bio-Ag for use as fertilizer. Approximately 490 acres are permitted for wastewater application as outlined in the Nutrient management plan.

Requested Revision: Provide a comparison of land spreading before vs. after expansion. If there is no or minimal change, this should be stated.

Response: The dried manure is planned to be sold under long-term contracts to nutrient agronomy management companies and will be sold to customers both in and outside the State of Wisconsin as organic fertilizer.

Egg wastewater is applied to approximately 490 acres of cropland as outlined in the permitted nutrient management plan. The cropland for spreading is available by agreement. Wastewater not able to be land applied is trucked to United Liquid Waste in Watertown. The land around the expansion project is not used for wastewater application. Over time additional cropland in the area may be added to the wastewater permitted cropland nutrient management plan.

- d. Report the average acreage for spreading on an annual basis (both current and proposed).
On average 490 acres are currently permitted for spreading wastewater. Compost is not spread on Creekwood land.
- e. In addition to land spreading manure, please describe any alternative manure disposal methods being proposed.

Manure will be dried and composted and used as a dry fertilizer. Daybreak has an agreement with Midwest Bio-Ag for taking the dry fertilizer. In the event that Midwest Bio-Ag is unable to fulfill the contract, Farm Nutrients LLC has the capacity to remove the compost from the facility.

- f. Estimate quantities (gal/yr) of any proposed discharges to surface waters or wetlands (such as treated egg wash water or non-contact cooling water).

Egg wash water is applied to cropland in accordance with the nutrient management plan as per an agreement with a local farmer.

Requested Revision: Provide quantitative data or estimates of the amount of manure to be land-spread, as well as the amount of eggwash water and feed-storage wastewater to be

discharged. Also, note whether there are wetlands or waterways adjacent to or near the new facility, and the potential for secondary impacts to these from runoff on the facility.

Response: *There are no proposed wastewater discharges to surface waters or wetlands. Egg wash water is applied to cropland in accordance with a nutrient management plan as per an agreement with a local farmer and United Liquid waste in Watertown is used on an as needed basis when conditions do not allow for land spreading.*

Stormwater runoff to adjacent wetlands is from roof runoff, grassed open space or paved areas which are generally detained in stormwater basins. Water quality impacts to adjacent wetlands are not anticipated.

9. Please discuss air quality issues associated with the proposed construction/expansion:

- a. How will odors from gaseous emissions be controlled (for example, emptying the pit when conditions are such that odors will be minimized, covering storage facilities, manure injection, siting storage facilities to take advantage of predominant breezes to keep odor away from housing, etc.)?

The building sites are setback from property boundaries to allow for odor dispersion. The proposed dry manure system has a history from existing barns to generate limited odor. Manure is confined to fertilizer storage buildings and the new layer house ventilation incorporates a dust collection system to reduce and control particulate emissions.

- b. Will fugitive dust or other particulate matter arise from the proposed project? Are there any plans to address this concern? [Note: Fugitive dust is dust arising from a process that does not go through a fan or exhaust port.]

Fugitive dust may arise during construction of the new facility. BMPs can be utilized if this becomes an issue. Dust control on gravel roads could be implemented if dust is generated during construction. New construction will incorporate hard surface (asphalt and concrete) roadways to enhance biosecurity and dust control. Fugitive dust has not created concern at the existing facility.

- c. Will any hazardous pollutants (ammonia, hydrogen sulfide) be a concern arising from this project? Are there any plans to address this concern?

The project presents the potential for particulate matter, dust, ammonia and hydrogen sulfide emissions and odors being generated. Standard methodologies for measurements and adoption for animal feeding operations have not been adopted in Wisconsin. Accurately quantifying how much of an air emission will be generated is difficult. The facility is planning to use a

manure drying system as used by other local aviary cage-free dry manure facilities. Odors are expected to be less with the new cage-free layer facilities as compared to existing facilities. An odor score will be generated as required by the Jefferson County Siting Ordinance.

Requested Revision: Note whether or not there are any hazardous pollutants; and if so, what plans are there to deal with should an issue arise.

Response: The project presents the potential for particulate matter, dust, ammonia and hydrogen sulfide emissions and odors being generated. Standard methodologies for measurements and adoption for animal feeding operations have not been adopted in Wisconsin. Accurately quantifying how much of an air emission will be generated is difficult. The facility is planning to use a manure drying system as used by other local aviary cage-free dry manure facilities. Odors are expected to be less with the new cage-free layer facilities as compared to existing facilities. An odor score will be generated as required by the Jefferson County Siting Ordinance.

Daybreak Foods Inc. has obtained an Air Pollution Control Construction Permit from the WDNR and will comply with conditions of that permit.

10. Please discuss water usage at the site during and after the construction process:

- a. Please report how many wells will be on the property, along with their locations and capacity. On average, how many gallons of water is the operation expected to use for livestock/poultry drinking and cleaning operations, and any other water uses (please report in gallons per minute and gallons per day)?

[Note: 70 gal/min or more from all wells on the property combined may require a high capacity well permit.]

New wells are expected to be constructed for the pullet, layer and food processing plant operations. The existing four wells are planned to be abandoned and new wells constructed convenient to the new facilities. The operation is expected to average 170,000 gallons of water use per day. Ranging from roughly 145,000 to 190,000 gallons per day depending on the season.

Requested Revision: Provide specific information on the location and capacity of individual wells. State whether or not any of the wells will be classified as “high capacity” (70 gal/min).

Response: The existing wells, except for the existing production building, are planned to be abandoned and new wells constructed convenient to the new facilities. The operation

is expected to average 170,000 gallons of water use per day. Ranging from roughly 145,000 to 190,000 gallons per day depending on the season.

The two (2) new wells constructed at the pullet site are 150 gpm high capacity wells to supply water to the three new aviary cage free pullet structures, the existing conventional pullet building and the new pullet site biosecurity shower in/out building, along with fire protection water to two fire hydrants. Capacities have been designed to meet the flock requirements as well as fire department water supply pressures and flows.

Four (4) new high capacity wells supply 200 gpm water each to the five new aviary cage free layer buildings, the new egg processing plant and the new layer bio-security shower in/out and office building, as well as domestic water to the new feed mill. The same water system will also supply fire protection water to fire department located fire hydrants on the layer and feed mill site.

The wells are part of a new high capacity well permit issued by the WDNR and are considered potable transient public water systems.

- b. Will the construction process require a temporary dewatering approval (70 gal/min or more used only during the construction process)?

Dewatering is not believed to be necessary during construction at the project site.

- c. Is there a private sewage system designed at the site for all human waste and employee/office water usage? If so, please describe its size and location.

The existing facility has a private septic system for current employee water disposal. Prior to installation of the facility east of Crossman Road, a Jefferson County Sanitary Permit will be obtained for the proposed cage free layer operation (processing plant, feed mill and other employee support).

Requested Revision: Provide details on the location and size of the sewage system(s).

Response: The pullet buildings and associated biosecurity building have a 1,000 gallon septic tank, a 1,000 gallon lift station tank, a 1,000 gallon septic tank, a 3,000 gallon septic tank and a 1,250 gallon lift station tank with a two cell mound drainfield. Each cell is 600 sqft.

The feed mill has 1000/600 gallon combination septic tank with a 396 sqft drainfield. The processing, and biosecurity building and breakroom at the layer site has a 8,000 gallon septic tank with a 1,000 gallon septic tank and a 3,000 gallon lift station with a 4,560 sqft. drainfield.

- d. What is the average depth of groundwater at this site? How was this determined (soil borings, soil book values, etc.)?

Groundwater at an existing Creekwood Farms well as constructed in 1972 is 32 feet. The depth to groundwater at the east site would be expected to be similar.

Requested Revision: Provide the groundwater depth for each well, as well as the average depth across the site. Note whether there are any groundwater infiltration issues and what will be done to address them.

Response: Wells drilled encountered groundwater at 35 to 37 feet below the surface at the pullet and layer site.

AFFECTED ENVIRONMENT (Describe existing features that may be affected/impacted by the proposal.)

11. Please discuss any disturbance to water resources that will occur during the course of the project:

- a. Will any wetlands, streams, rivers, or lakes be disturbed? Please estimate the extent of the disturbance. (For example, how many feet/acre-feet of streams will be redirected or rechanneled? How many acres of wetlands will be impacted? Etc.)

No wetlands, streams, rivers or lakes are proposed to be disturbed with construction of the facility. If the pipeline is planned to connect to the existing egg wash water treatment system, areas potentially wetland may need to be temporarily disturbed to install the pipe. A wetland investigation will be prepared for wetland identified on the WDNR Water Viewer Map.

- b. What are the names of any navigable waterways within the drainage area of the proposed operation and construction areas? Describe their proximities to these areas.

From the proposed pullet facility, a ditch drains surface water to the west then south through an unnamed ditch system. The layer facility has limited grade to the east where runoff would drain to an unnamed ditch system, then north.

- c. Describe and locate any sub-surface drain tiles and ditches proposed to be installed.

Drain tile are not known to be located in the construction area.

- d. In what watershed(s) do you propose to landspread manure (please use DNRdesignated watersheds)?

If Midwest Bio Ag is unable to fulfill their contract to remove compost and Farm Nutrients LLC are unable to remove the compost, compost could be landspread in the Rock Creek watershed and the Crawfish River watershed.

- e. Name all waterbodies classified as Outstanding or Exceptional Resource Waters that are or will be affected by the operation (including watersheds that landspreading will occur within.) [Note: Contact Ann Schachte at the Department of Natural Resources at 608-267-2301 or schaca@dnr.wi.state.us.]

Based on the DNR-Surface Water Viewer website, it does not appear that Outstanding or Exceptional Resource Waters are within the site or landspreading area watersheds.

12. Please describe the biological environment that may be affected by the proposal:

- a. What are the current cover crops (including trees) and will these be affected, destroyed, or changed in any manner?

The construction site is currently primarily cropland including corn and soybeans. Once construction is completed the land surrounding the buildings will be grassed with the adjacent lands remaining in cropland.

- b. Describe any State Natural Areas or prime agricultural lands that may be disturbed. [Note: A list of State Natural Areas can be found at <http://www.dnr.state.wi.us/org/land/er/snass/bycountylist.htm>. Prime agricultural lands are designated on the USDA SCS/NRCS soil survey.]

No State Natural Areas are planned to be disturbed. The nearest State Natural Areas are the Mud Lake Fen and Wet Prairie located half a mile away from the site and Bean lake located a mile away from the site. This was determined by viewing the WDNR Public Access Lands Map Viewer.

According to the USDA/NRCS Web Soil Survey the soils classified as Fox silt loam cover a large portion of the construction site. Fox silt loam is classified as Prime Farmland. This land will remain in agricultural land use.

- c. What are the dominant aquatic species currently present in the waterbodies discussed in Section 11? Describe how these species may be affected, destroyed, or changed in any manner.

No water bodies are proposed to be affected by the construction of the site.

- d. What terrestrial wildlife species are present (nesting/denning, feeding, migratory, etc.) and how will these be affected? Will their habitat be affected, destroyed, or changed in any manner?

The acreage of cropland will be reduced with construction of the proposed buildings but it is believed that this area would continue to provide habitat for common animal species adapted to cropland.

- e. Are you aware of any threatened or endangered plant or animal species present? [Note: The Department will supplement the information provided here with data from the Bureau of Endangered Resources.]

In viewing the WDNR Natural Heritage Inventory Public Portal website endangered resources are present and the species present are legally protected. Further actions are required to ensure compliance with Wisconsin's Endangered Species Law (s. 29.604 Wis. Stats.) and the Federal Endangered Species Act (16 USC ss 1531-43).

Because the proposed project is expected to disturb cropped agricultural and be used for agricultural purposes, it is expected to be under the exception Activity 2-A2 under Table 2 of the Broad Incidental Take Permit/Authorization for No/Low Impact Activities. An Endangered Resources Review has been requested for confirmation.

13. Please describe how the proposal may affect the cultural environment through changes in land use:

- a. At the present time, what are the dominant land uses on and adjacent to the project site? Will these land uses change as a result of the proposal?

Cropland is the dominant land use on and adjacent to the area of the project. Changes in adjacent land use are not anticipated.

- b. What is the current zoning of the site, and will this need to or has this changed for the proposal?

According to the Jefferson County zoning map, the parcel is zoned A-1 and will remain A-1.

14. Please describe the potential positive and negative impacts of the proposal on neighboring communities:

- a. What houses, businesses and/or farms are located close to the proposed site? Please describe their proximity.

Approximately 45 houses/farms lie within a mile radius around the proposed site, with the nearest being south approximately 500 feet.

- b. How will people be positively or negatively impacted by the proposal?

The project will have many positive benefits. This project will increase the tax base for local schools and the community. Organic nutrients will improve soil quality while helping to limit commercial fertilizer purchases. The local economy will benefit as a result of added employment opportunities through the facility and through the purchases of goods and services from local farmers and businesses. Indirect jobs will be created as well. The replacement of aged facilities will give way to new, more aesthetically pleasing, architecturally enhanced structures that fit the rural farming environment. The site will be surrounded with multiple species of new deciduous and nondeciduous trees, and roadways will be hard surface.

Negative impacts may include increased traffic and general changes to the current landscape. Considering land use in the area is primarily agricultural and the facility will significantly replace an existing aged facility, traffic and visual impacts are not believed to be considered significant.

Requested Revision: Discuss whether and to what extent there could be negative impacts beyond traffic; e.g., noise, odor, possible water-quality impacts from land-application or infiltration, secondary impacts to adjacent or nearby wetlands and waterways.

Response: *The project will have many positive benefits which include an increased tax base, along with many additional well-paying labor, supervision and management positions. In addition, this project will replace an older, less desirable chicken layer and pullet site that uses older technologies in structures that are vintage and ready to be replaced. Odors that have been associated with the old site will no longer be an environmental concern as the new site with new equipment and state-of-the-art technology will provide for significantly less odor impact. Esthetically this project*

will provide a much cleaner, more organized and attractive farm to compliment the local area with new building architecture as well as landscaping and hard surface paved roadways.

Negative impacts may include increased traffic (both shipping and receiving trucking and employees) as well as general changes to the current landscape.

- c. How will the economy of the community be affected? Include specific dollar amounts entering or leaving the community.

There will be a positive effect to the local economy through direct and indirect employment opportunities and through the purchases of goods and services from local farmers and businesses. Based on similarly sized facilities Creekwood is estimating the following economic impacts.

Employment opportunity summary:

- *Up to 20 new full time employees at the farm ○ Additional Annual Payroll in excess of \$1,000,000.00*
- *Indirect local jobs created for goods and services consumed by the facility*

Annual numbers production:

- *320,000,000 additional eggs produced annually*

Resources used annually:

- *Estimated feed stuffs used and purchased locally*
- *100,000 tons of corn, soybean meal and other feed ingredients*
- *Estimated annual utility needs:*
 - *Electrical use \$750,000*

Other Estimated State and Local benefits:

- *Improve grain basis on feed grains used*
- *Increased Real Estate taxes*
- *State sales and excise tax to build the project*
- *Food, lodging, and fuel used during construction phase of the project by many construction workers*
- *State sales tax on many items purchased annually for the farm*

Requested Revision: Provide projected direct impacts (employment, payroll, etc.) for the proposed facility, rather than estimates based on similar sized facilities. Otherwise, identify the reference facilities. Note the potential for negative economic impacts.

Response: *There will be a positive impact to the local economy through direct and indirect employment opportunities and through the purchases of goods and services from local farmers and businesses. Based on hard numbers extrapolated from our AP department from the existing site, we are estimating the following economic impacts to the local economy within a 20 mile radius of the new operation:*

<i>Expenditure Area</i>	<i>Current Year</i>	<i>Post Expansion</i>
<i>Corn for Feed from local farmers</i>	<i>\$1,820,000</i>	<i>\$5,200,000</i>
<i>Salaries and Wages</i>	<i>\$1,800,000</i>	<i>\$2,800,000</i>
<i>Local Business to Business</i>	<i>\$2,200,000</i>	<i>\$3,500,000</i>
<i>Property Taxes to State, County and Township</i>	<i>\$82,000</i>	<i>\$200,000</i>
<i>Totals</i>	<i>\$5,902,000</i>	<i>\$11,700,000</i>

- d. Are any impacts on property values expected as a result of this project?

With increased markets and economic activity in the area, and increased investment in the farm, overall farm and community property values are expected to stay the same or increase.

Requested Revision: Note the potential for negative economic impacts.

Response: *Daybreak compensated at a premium level for the farmland on which the new layer site is being constructed. As real-estate costs follow comparables, the most likely outcome will be a rise in adjacent land values.*

- e. How many local residents are currently employed by the operation? How many will be newly employed after expansion (if applicable)?

The facility employs 30 full time employees. The employees generally live within a 30-mile radius of the facility. Twenty additional employees may be hired along with indirect labor.

- f. Do you expect controversy associated with the proposed project (for example, but not limited to, concerns about particular waterbodies, odor impacts on nearby development, increased traffic, etc.)?

It is believed the local farm people and rural residents are supportive of agriculture in the community. Considering the positive facility design practices at the new facility, the restructured facility will be a very positive change to the area. Communication has already begun between Daybreak Foods / Creekwood and certain community groups and representatives to explain the positive impacts of the expansion and site improvements over any historical challenges.

Requested Revision: Revise the response to reflect the new proposal; i.e., development of a new site, as opposed to redeveloping of the existing.

Response: There is mixed reaction to the expansion and re-creation of the Creekwood site. A majority of the local Township is either in favor or silent on the topic and the unanimous voting in favor of the project at the local level is reflective of those views. As is often the case, there exists a vocal minority that is not in favor of larger animal operations, and argue that ground water, surface water and air pollution could be a result of the operation of the new facility. Daybreak Foods has taken great engineering and construction strides to avoid or reduce, if not eliminate, these concerns. In addition, communication has been on-going between Daybreak Foods / Creekwood and local community groups and representatives to explain the positive impacts of the expansion and site improvements over any historical challenges

15. Please describe how the proposal may affect the archaeological or historical settings near the site: [Note: The Department will supplement the information provided here with data from its historical and archeological records.]

- a. Are you aware of any archaeological areas that may be disturbed (for example, but not limited to Native American burial sites)?
- b. Are there any state or national historical sites near the proposed site (refer to the Historical Register)? Will these sites be disturbed?

The facility owners are not aware of archeological or historical settings located near the site, however site screening has been requested.

ALTERNATIVES TO THE PROPOSED ACTION

16. Please identify, describe and discuss at least three other alternatives to the proposed project. Give particular attention to the alternatives that might avoid some or all of the land and/or water resource disturbances. Why weren't these alternatives chosen? Please address the following, as well as any other options that were considered:

- a. Have other locations been studied, and why were they not chosen? Would the other locations present a lesser negative impact to the environment?

Other adjacent land holdings were considered but were not available. This expansion of the site was chosen based on partner's land base and land base available for land spreading agreements. This location was selected based on obtaining land spreading agreements required for a Nutrient Management Plan and proximity to existing facilities.

- b. What would happen to the environment if the proposal were enlarged or doubled?

If the proposed project was enlarged or doubled, the facility would need to work with neighboring land owners to add additional land to the nutrient management plan for manure land application and additional housing and waste storage would be needed.

- c. Would the possible impacts to the environment be less if the proposed project were installed at half the proposed size?

A half sized facility would not likely have less impacts, but the same facilities and land spreading would need to be built and conducted at a smaller scale reducing the economic benefits of the facilities size.

17. Explain other factors that should be considered in determining the significance of the project, or any other pertinent information.

The WPDES permit process requires no discharge of waste from the production area of the Creekwood Facility. The permit requires the facility have adequate structures, nutrient management plans and reporting requirements to protect water quality. This process and oversight is indented to avoid environmental impacts associated with facilities not operating under a WPDES permit.

Robert Pofahl
Person completing form (please print)

Resource Engineering Assoc., Inc.
Title/Company

Robert Pofahl
Signature
President

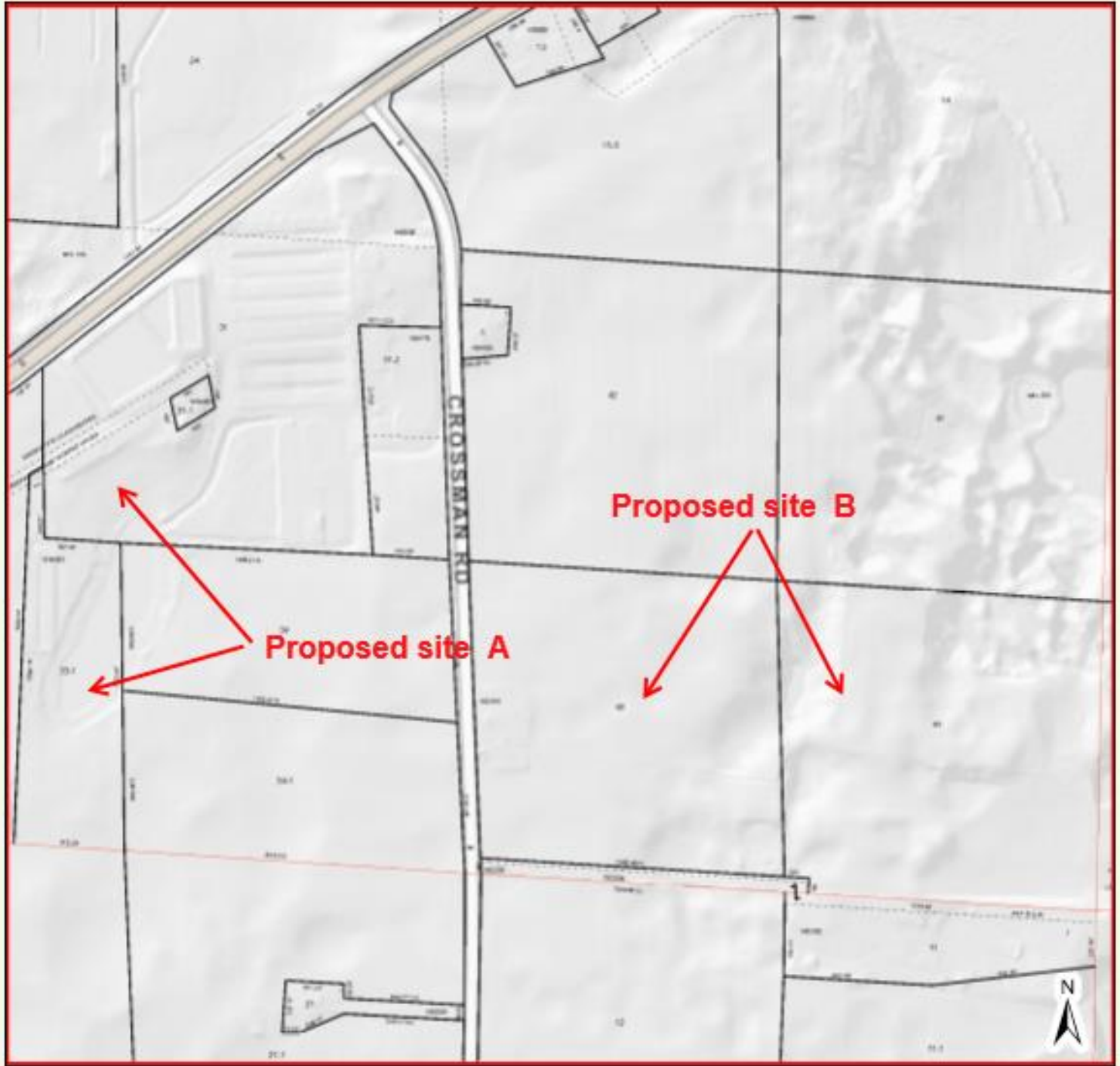
6/30/17
Date













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This publication is available in alternative format (large print, Braille, audio tape, etc.) upon request. Please call (608) 267-7694 for more information.

Jefferson County Land Information Plat Layers



- | | |
|--|---|
|  Municipal Boundaries |  Section Lines |
|  Property Boundary |  Surface Water |
|  Old Lot/Meander Lines |  Map Hooks |
|  Rail Right of Ways |  Tax Parcels |
|  Road Right of Ways |  Streams and Ditches |

600 300 0 600 Feet

1 inch = 600 feet

Printed on: June 30, 2017

Author: Public User



Soils Map map



Legend

NRCS Wisconsin Soils

- Soil Mapping Unit
- Water



0.3 0 0.13 0.3 Miles

NAD_1983_HARN_Wisconsin_TM

1: 7,920

DISCLAIMER: The information shown on these maps has been obtained from various sources, and are of varying age, reliability and resolution. These maps are not intended to be used for navigation, nor are these maps an authoritative source of information about legal land ownership or public access. No warranty, expressed or implied, is made regarding accuracy, applicability for a particular use, completeness, or legality of the information depicted on this map. For more information, see the DNR Legal Notices web page: <http://dnr.wis.gov/legal/>

Notes



Wetland and wetland indicator map



Legend

- Wetland Class Points**
 - Dammed pond
 - Excavated pond
 - Filled excavated pond
 - Filled/drain wetland
 - Wetland too small to delineate
- Filled Points**
 -
- Wetland Class Areas**
 - Wetland
 - Upland
- Filled Areas**
 -
- NRCS Wetspots
- Wetland Indicators

0.3 0 0.13 0.3 Miles

NAD_1983_HARN_Wisconsin_TM

1: 7,920

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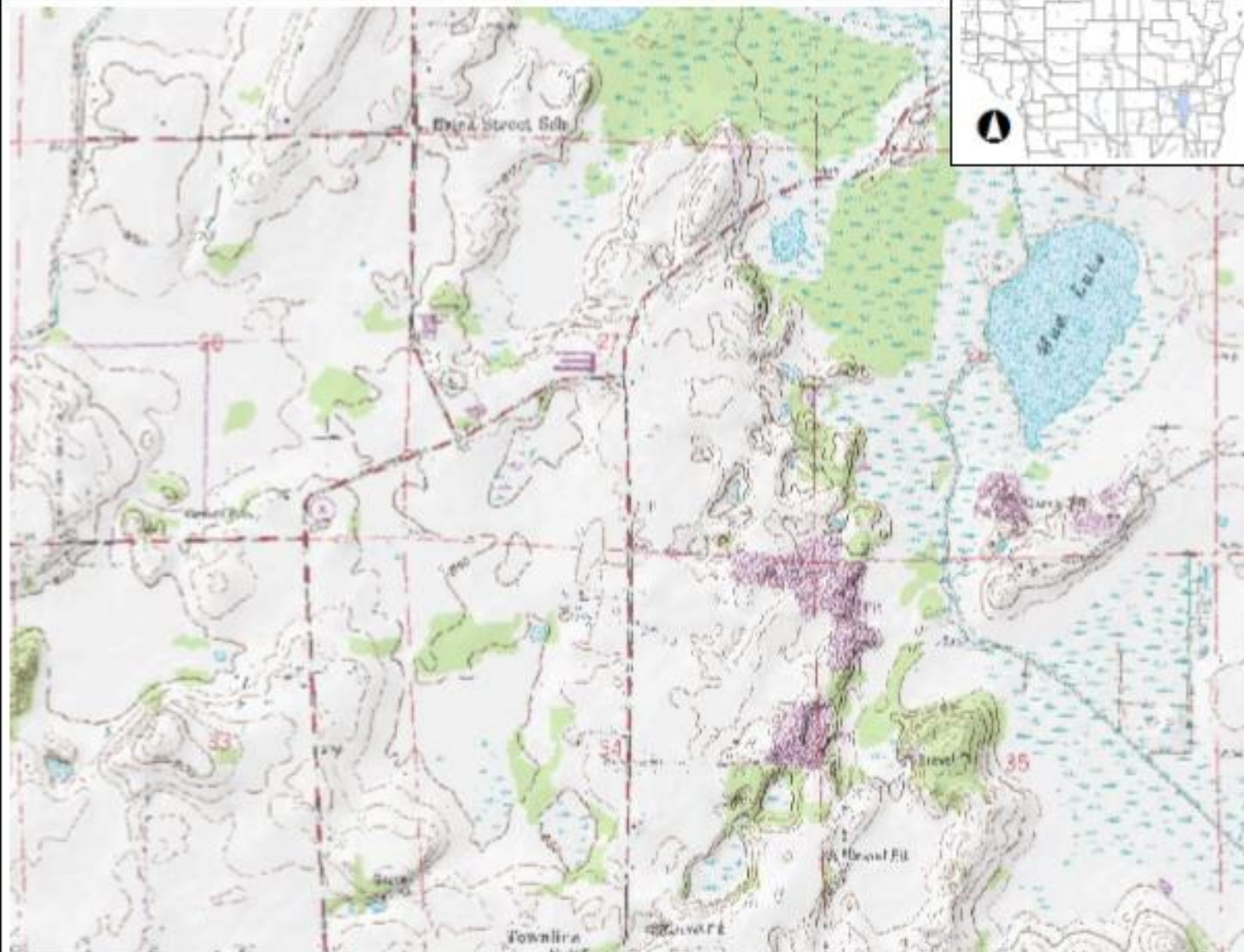
Notes



Topo Map



Legend



Notes

0.8 0 0.38 0.8 Miles

NAD_1983_HARN_Wisconsin_TM

1: 23,760

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Topo Map



Legend



0.3 0 0.13 0.3 Miles

NAD_1983_HARN_Wisconsin_TM

1: 7,920

DISCLAIMER: The information shown on these maps has been obtained from various sources, and are of varying age, reliability and resolution. These maps are not intended to be used for navigation, nor are these maps an authoritative source of information about legal land ownership or public access. No warranty, expressed or implied, is made regarding accuracy, applicability for a particular use, completeness, or legality of the information depicted on this map. For more information, see the DNR Legal Notices web page: <http://dnr.wis.gov/legal/>

Notes



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DATE	
DATE	
DATE	

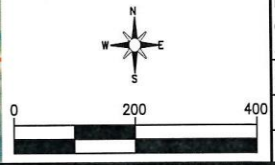
Resource Engineering Associates, Inc.
 1000 North Lincoln Street
 Middleton, Wisconsin 53562-2507
 Phone: 608-831-5522
 Fax: 608-831-6564
 Web: www.reaeng.com



PROPOSED SITE LAYOUT
 FACILITY EXPANSION
 DAYBREAK FOODS, INC.
 533 E TYRANENA PARK RD
 LAKE MILLS, WISCONSIN 53551

DATE: APR 2017
 DRAWN: JWA
 CHECKED: RJP
 APPROVED: RJP
 DRAWING NAME:
 1720topo creekwood (170615).dwg
 PROJECT NUMBER:
 170020.1

C101



REVISIONS:	
DATE	
DATE	
DATE	
DATE	

Resource Engineering Associates, Inc.
 3510 Parkcenter Street, Suite 100
 Middleton, Wisconsin 53562-2507
 Phone: 608-831-5522
 Fax: 608-831-6564
 Web: www.reaeng.com



PROPOSED SITE LAYOUT
 --- CLIENT ADDRESS
 --- CITY, STATE ZIP CODE

DATE: MM YYYY
 DRAWN: --
 CHECKED: ---
 APPROVED: RJP
 DRAWING NAME:
 1720topo nelson.dwg
 PROJECT NUMBER:
 150000.1

C101

Updated Maps



LEGEND:
 EXISTING WELL

NOTES:
 1) DIMENSIONS AND LOCATIONS ARE APPROXIMATE BASED ON LATEST SITE CONSTRUCTION OF AERIAL PHOTOGRAPHY. A TOPOGRAPHIC SURVEY PERFORMED BY REA, INC. PROFESSIONAL AND AN ALTA SURVEY PERFORMED BY LANDTRON IN PERSONNEL.

REVISIONS:	
DATE	
DATE	
DATE	
DATE	

Resource Engineering Associates, Inc.
 3510 Farmworker Street, Suite 100
 Middleton, Wisconsin 53562-2507
 Phone: 608-831-5522
 Fax: 608-831-6564
 Web: www.reaeng.com



EXISTING SITE MAP - WEST
 WPDDES PERMIT
DAYBREAK FOODS, INC.
 533 E TYRANENA PARK ROAD
 LAKE MILLS, WI 53551

DATE: OCT 2019
 DRAWN: JWA
 CHECKED: RJP
 APPROVED: RJP
 DRAWING NAME:
 1720 construction.dwg
 PROJECT NUMBER:
 170020.1

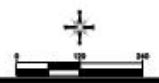


FIG. 1



- LEGEND
- EXISTING WELL
 - PROPOSED WELL

NOTES
 1) DIMENSIONS AND LOCATIONS ARE APPROXIMATE BASED ON LATEST SITE CONSTRUCTION, AS APPLICABLE. PHOTOGRAPHIC SURVEY PERFORMED BY R.E.A. INC. FIELDWORK, AND AN ALTA SURVEY PERFORMED BY LUTHECH & PERDUE.

REVISIONS:	
DATE	
DATE	
DATE	

Resource Engineering Associates, Inc.
 3510 Paramount Street, Suite 100
 Middleton, Wisconsin 53562-2507
 Phone: 608-831-4522
 Fax: 608-831-4504
 Web: www.reaeng.com

RESOURCE ENGINEERING ASSOCIATES, INC.



PROPOSED SITE MAP-WEST
 WPDES PERMIT
 DAYBREAK FOODS, INC.
 533 E. TYRANENA PARK ROAD
 LAKE MILLS, WI 53551

DATE: OCT 2019
 DRAWN: JWA
 CHECKED: RJP
 APPROVED: RJP
 RELATING TO: 1720 construction WPDES.dwg
 PROJECT NUMBER: 170020.1

FIG. 3



LEGEND
 EXISTING WELL

NOTES
 1) DIMENSIONS AND LOCATIONS ARE APPROXIMATE BASED ON LIMITED SITE OBSERVATIONS, IN AERIAL PHOTOGRAPHS, A TOPOGRAPHIC SURVEY PERFORMED BY R.E.A. INC. PROFESSIONAL AND IN A.S. SURVEY PERFORMED BY LANDTECH IN PERSONNEL.

REVISIONS	
DATE	DATE

Resource Engineering Associates, Inc.
 3510 Parkcenter Street, Suite 100
 Middleton, Wisconsin 53562-2507
 Phone: 608-831-5522
 Fax: 608-831-6664
 Web: www.reaeng.com

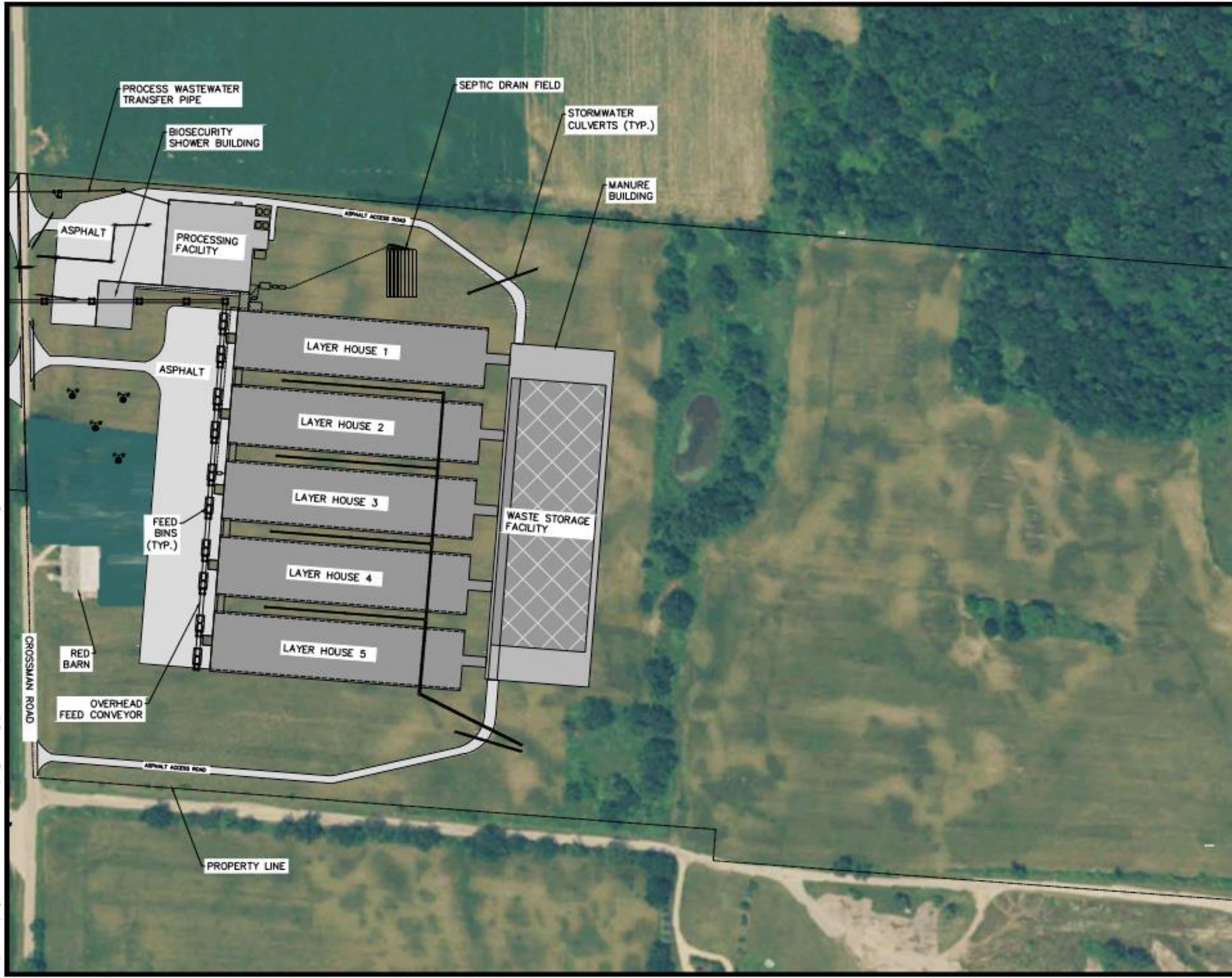


EXISTING SITE MAP-EAST
 WPDES PERMIT
 DAYBREAK FOODS, INC.
 533 E. TYRANENA PARK ROAD
 LAKE MILLS, WI 53551

DATE: OCT 2019
 DRAWN: JWA
 CHECKED: RJP
 APPROVED: RJP

DRAWING NAME:
 1720 construction.dwg
 PROJECT NUMBER:
 170020.1

FIG. 2



LEGEND:
 PROPOSED WELL

NOTES:
 1) DIMENSIONS AND LOCATIONS ARE APPROXIMATE BASED ON LIMITED SITE OBSERVATIONS, AN AERIAL PHOTOGRAPH, A TOPOGRAPHIC SURVEY PERFORMED BY REA, INC. PERSONNEL, AND AN ALTA SURVEY PERFORMED BY LANDTECH IN PERSONNEL.

REVISIONS:	
DATE	
DATE	
DATE	
DATE	

Resource Engineering Associates, Inc.
 3510 Parmelee Street, Suite 100
 Middleton, Wisconsin 53562-2507
 Phone: 608-831-5522
 Fax: 608-831-6564
 Web: www.reaeng.com



PROPOSED SITE MAP-EAST
 WPDES PERMIT
 DAYBREAK FOODS, INC.
 533 E TYRANENA PARK ROAD
 LAKE MILLS, WI 53551

DATE: OCT 2013
 DRAWN: JWA
 CHECKED: RJP
 APPROVED: RJP
 DRAWING NAME:
 1720 construction WPDDES.dwg
 PROJECT NUMBER:
 170020.1



FIG. 4

February 18, 2020

Michael Webber
Agricultural Runoff Specialist
Wisconsin Department of Natural Resources
Fitchburg Service Center

RE: DNR request for additional information for updated EAQ for Daybreak Foods Creekwood

Mr. Webber,

Below is the requested information for the updated EAQ with your request listed.

Section 2, part C: Provide additional information on the amounts of impervious surfaces at the new facility.

The pullet site located on the west side of the facility is planned to have approximately 132,915 sq. ft of building impervious surface and approximately 173,925 sq. ft of asphalt/concrete impervious surface.

The layer site located on the east side of the facility is planned to have approximately 305,912 sq. ft of asphalt/concrete impervious surface and approximately 546,955 sq. ft of building impervious surface.

Section 8, part F: Provide a map that displays and identifies wetlands and surface water bodies adjacent to the farm. Identify which have the potential to receive inputs of runoff from the operation.

Attached are wetland delineation maps of the layer and pullet sites.

The larger wetland (W-1) on the layer site has the potential to receive roof runoff from the adjacent building. Roof runoff would flow down a grass embankment and/or a rock channel prior to entering the wetland. The smaller wetland (W-2) does not have potential to receive runoff from the site.

The pullet site wetland map shows three wetlands adjacent to the site. Wetland W-2 (farmed wetland) has potential to receive runoff from the asphalt surface south of pullet houses 1 and 2. The larger wetland W-1 has the potential to receive runoff from the buildings and asphalt surfaces. The majority of storm water runoff is routed through two storm water detention basins prior to entering the wetland. The smaller wetland (W-1) is located off the Daybreak Foods property and does not receive runoff from the site.

Section 9, part C: State whether or not the odor score as a part of the Jefferson County Siting Ordinance has been calculated at this point in time; and if so, state what the score was.

The current odor score is 677. The current odor score reflects the farms' plan to demo the 9 existing layer buildings and the westernmost compost building. The farm now plans to demo the existing pullet building (G3) as well. The updated odor score has been calculated to reflect the demo of pullet building G3. The updated odor score is 680.



3510 Parmenter Street
Suite 100
Middleton, WI 53562

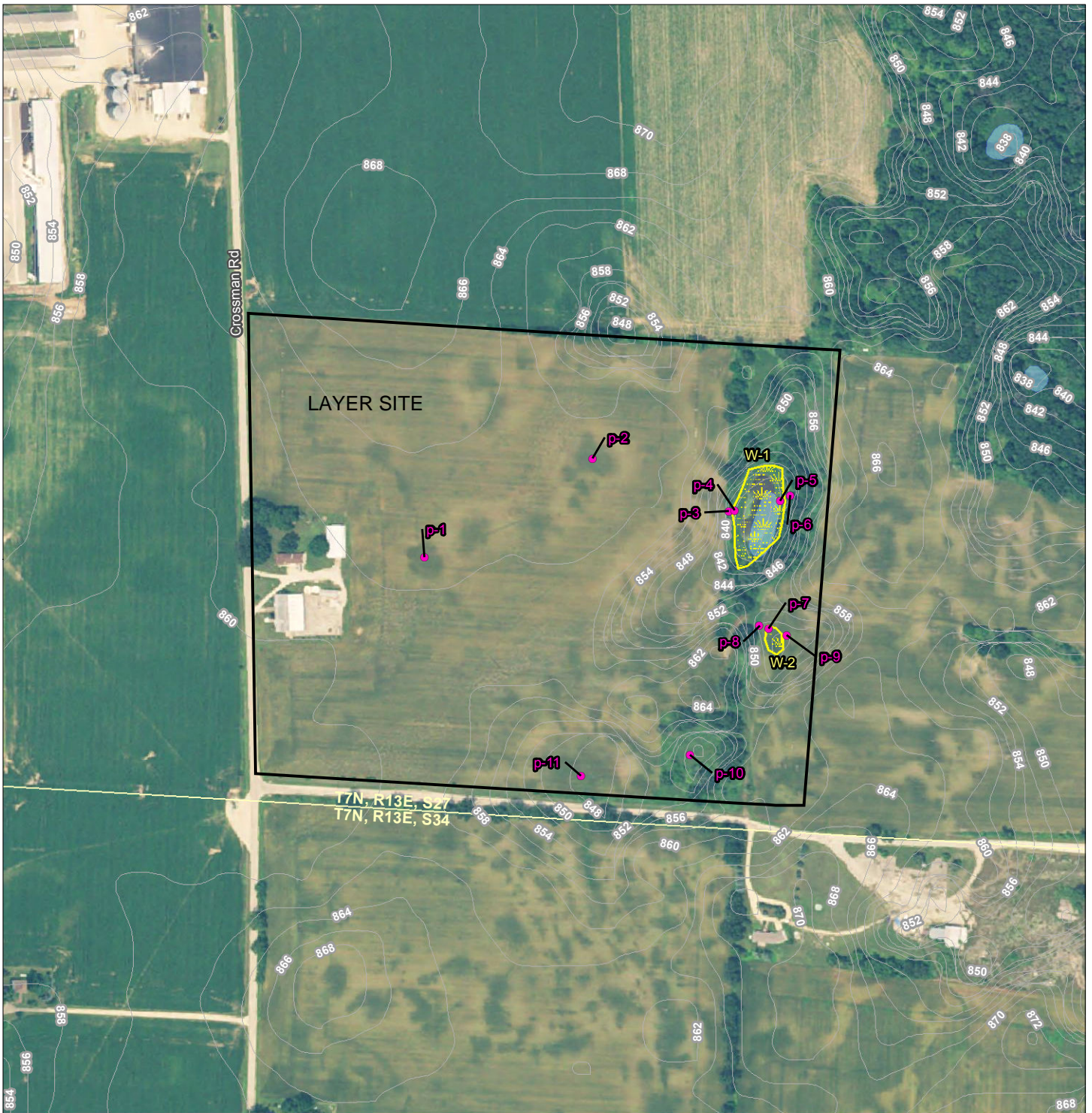
Phone: 608-831-5522
Fax: 608-831-6564
Web: www.reaeng.com

Please let us know if you have any questions or need further information.

Sincerely,

A handwritten signature in blue ink that reads "Robert Pofahl". The signature is stylized and includes a small "4" at the bottom right.

Robert Pofahl, P.E.



- Notes**
1. Coordinate System: NAD 1983 StatePlane Wisconsin South FIPS 4803 Feet
 2. Data Sources Include: Stantec, WDOT, WDNR
 3. Orthophotography: NAIP 2015

Disclaimer: Stantec assumes no responsibility for data supplied in electronic format. The recipient accepts full responsibility for verifying the accuracy and completeness of the data. The recipient releases Stantec, its officers, employees, consultants and agents, from any and all claims arising in any way from the content or provision of the data.

Legend

- Approximate Project Boundary
- 2ft Elevation Contour
- Sample Point
- Field Delineated Wetland
- DNR 24k Hydrography
- Perennial Stream
- Intermittent Stream
- Waterbody

Figure No.

5

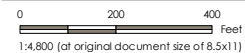
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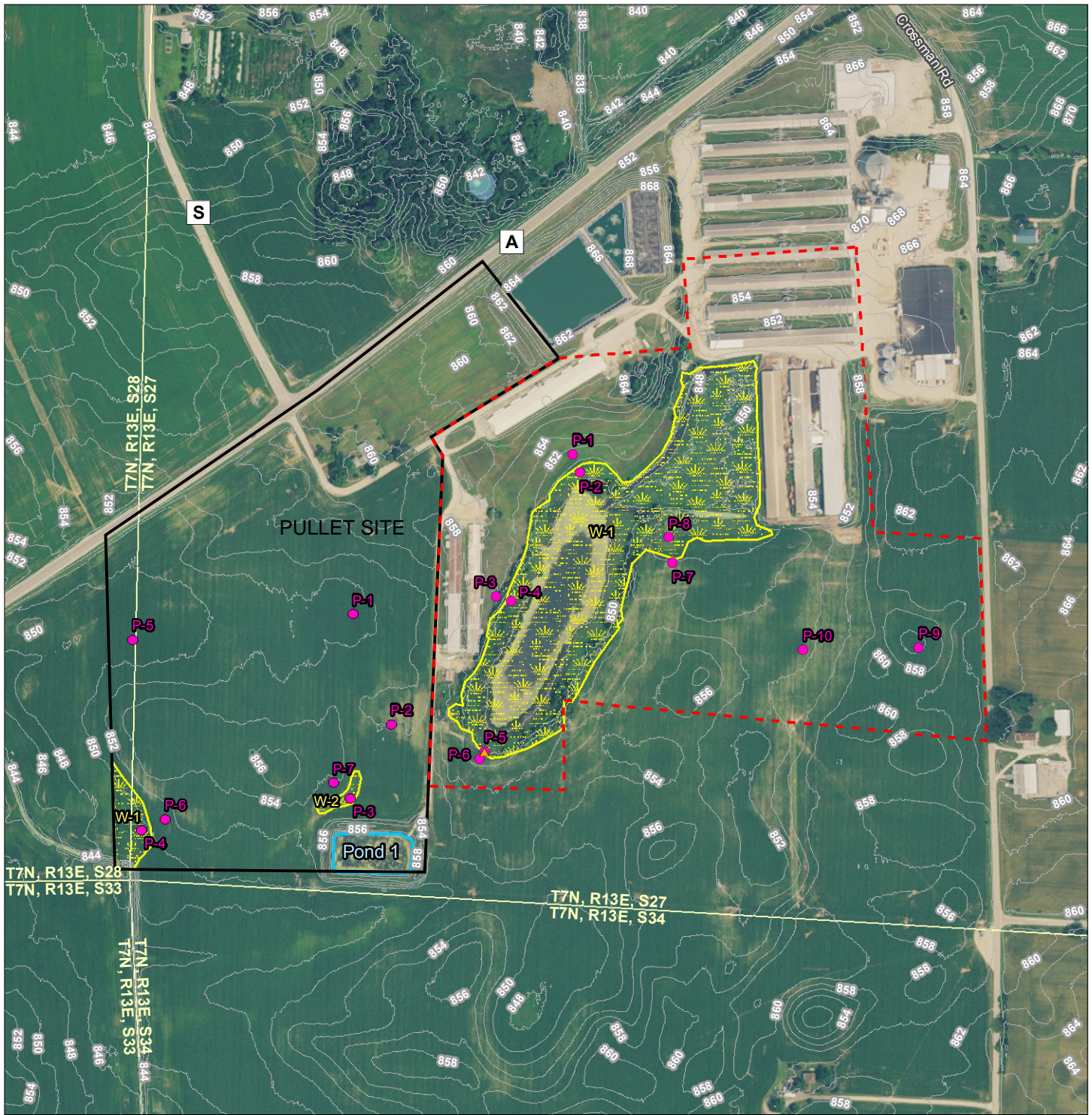
Title

Field Collected Data

Client/Project
Daybreak Foods, Inc.
Nelson Site
Wetland Delineation

Project Location 193705272
T7N, R13E, S27. Prepared by JM on 2017-07-05
T. of Lake Mills. Technical Review by BT on 2017-07-05
Jefferson Co., WI Independent Review by XX on 2017-XX-XX





- Notes**
1. Coordinate System: NAD 1983 StatePlane Wisconsin South FIPS 4803 Feet
 2. Data Sources Include: Stantec, WisDOT, WDNR
 3. Orthophotography: NAIP 2015

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Legend

- Approximate Project Boundary
 - May 2017
 - October 2017
- 2ft Elevation Contour
- Sample Point
- ▲ Drainage Tile Discharge
- Field Delineated Wetland Area
- Pond
- ~ DNR 24k Hydrography
 - ~ Perennial Stream
 - - - Intermittent Stream
 - Waterbody

Figure No.
5a

Title
Field Collected Data

Client/Project
Daybreak Foods, Inc.
Creekwood Site
Wetland Delineation

Project Location 193705272
T7N, R13E, S27-28, Prepared by SF on 2017-05-10
T. of Lake Mills Technical Review by MG on 2017-05-11
Jefferson Co., WI Independent Review by KM on 2017-08-14

