

2024 NMP Annual Narrative Update

Coleman Ponderosa LLC

N2727 23rd Rd
Coleman, WI 54112

February 19, 2025

Introduction

Coleman Ponderosa LLC (hereinafter “Coleman Ponderosa” or the “farm”) is a dairy operation consisting of two (2) different facilities which are more specifically described below. The farm is currently covered under WPDES Permit No. WI-0064912-03-0 (the “Permit”) which was recently renewed on May 1, 2023.

Heifer Site

The heifer site also known as “CP-1” throughout this narrative, is located at N2727 23rd Road, Coleman, Wisconsin. There are currently 2,255 heifers onsite (442 – 400 lbs. to 800 lbs. and 1,813 – 800 lbs. to 1200 lbs.) which are housed under roof. The facility for the heifer operation consists of the following:

- Two (2) free stall barns;
- Solid separator;
- WSF 1 which is a steel slurry store which has an MOL volume of 422,129 gallons;
- WSF 2 which is a concrete lined facility with an MOL volume of 5,250,105 gallons;
- Solid stacking area which is located on the concrete ramp of WSF 2 (solids are then land applied or agitated into WSF 2); and
- Concrete feed storage area which leachate and runoff are contained and pumped to WSF 2 and any excess overflows to a vegetated treatment area.

Dairy Site

The dairy site a/k/a CP-2 throughout this Narrative is formerly known as the “Brye Facility” and is located at N2193 Highway 141, Coleman, Wisconsin. There are 3,000 cows onsite which are housed under roof. The facility for the dairy operation consists of the following:

- Parlor area and two (2) free stall barns;
- WSF 3 which is a concrete lined facility with an MOL volume of 446,206 gallons;
- WSF 4 which is a concrete lined facility with an MOL volume 4,629,521 gallons;
- WSF 5 which is a concrete lined facility with an MOL volume of 14,753,053 gallons;
- Concrete / asphalt feed storage area with a concrete leachate containment area (WSF 6) with an MOL volume of 982,426.

CP-2 is currently evaluating the construction of the following facilities which may or may not occur in 2025:

The farm will be constructing the following facilities at the CP-2 site: (i) RNG system; (ii) nutrient recovery system; (iii) solid separator; (iv) wash bay; and (v) two (2) digesters. Once the farm is ready to proceed with these projects, the farm will submit plans and specifications to the Department.

Land Base in NMP

The farm has a total of 7,402 acres in its nutrient management plan (“NMP” or the “plan”) consisting of 677 acres owned by Coleman Ponderosa and 6,725 acres rented or under agreement with neighboring cooperating growers.

Field Changes

The following fields notes / changes in this NMP are:

- Jerid Wos Fields:
 - Jerid Wos-126 acres decreased from 42.5 to 8.2 acres.
 - Jerid Wos-55 additional acres will be submitted for approval once the correct number of soil samples are obtained this spring.
- Kuchta Fields:
 - Boehm, Roenfranz and Steve Frievault fields had a substantial revision submitted on January 29, 2025, as of February 13, 2025, they were approved by the WDNR.

Compliance Check Report

The compliance check report shows too few of soil samples for fields AB-Schlosser 1 and Jerid Wos-109. The correct number of soil samples for AB-Schlosser 1 and Jerid Wos 109 will be obtained when soil conditions are favorable this spring.

The compliance check report shows over N application on field Jerid Wos 126. The manure application was made in spring of 2024. At the time of the application this field was 42.5 acres and has been for the whole 2024 crop year; however, starting in the 2025 crop year, 34 acres of this field is being rented to someone else.

In connection with the overapplication on wet (W) soils for the fall applications for the crop year 2024 for Jerid Wos 150, Jerid Wos CB 1 and RC-2 and highly permeable (P) soils for SP-4, as shown in the compliance check report, the prior plan writer (B. Todd Koss) provided the farm with recommended rates in excess of the limits provided under NRCS Code 590. Since the farm utilized nitrification inhibitor, among other practices, the prior plan writer believed that such practices permitted application rates in excess of 120 pounds of available N per acre based on a 2012 conversation with the Department; however, the prior plan writer recently learned these practices are no longer permitted. Therefore, going forward, (W) and (P) soils (and bedrock (R) soils) will only receive application rates consistent with NRCS Code 590.

Crop Rotations

The farm does not follow any specific rotation with its crops. Rotations depend upon feed needs for the farm and T-levels.

Manure Documentation

Coleman Ponderosa uses a custom, WDNR approved, Manure Application Checklist/Load Sheet for all application documentation which can be found in Section 8.

Wisconsin NR 243 Requirements

Farm Sites with Expected Animal Numbers for First Year of Permit and Remaining Permit Term

The following tables provide the current and expected animal numbers that will be included for the first year permit term and the remaining permit term. Current and projected animal numbers are listed below and are consistent with the *final* A.U. Calculation Worksheet(s) (form 3400-25A). See Section 1 of the plan for this information. Please be advised that future years are an estimate of animal numbers and actual numbers may vary from these values. Actual animal numbers will be revised in future NMP annual updates.

CP-1 Number of Animals:

Year	Herd Size (1000lbHeifer+600lbHeifer)	Total Mixed Animal Units for CP-1
2022	750Lbs = 817, 1000Lbs = 1275 1400Lbs = 650 (prior agronomist's info.)	2803
2023	1,813+442	2,260
2024	1,830+442	2,278
2025	1,830+442	2,278
2026	1,830+442	2,278

CP-2 Number of Animals:

Year	Herd Size (Milk)	Total Mixed Animal Units for CP-2
2022	750Lbs = 817, 1000Lbs = 1275 1400Lbs = 650 (prior agronomist's info.)	2803
2023	684	958
2024	3,000	4,200
2025	3,000	4,200
2026	3,000	4,200

Total Number of Animals from All Sites:

Year	Herd Size (Milk+1000lbHeifer+600lbHeifer)	Total Mixed Animal Units for Both Sites
2022	750Lbs = 817, 1000Lbs = 1275 1400Lbs = 650 (prior agronomist's info.	2803
2023	684+1,813+442	3,218
2024	3,000+1,830+442	6,478
2025	3,000+1,830+442	6,478
2026	3,000+1,830+442	6,478

Expected Amounts and Types of Manure and Process Wastewater Produced on Annual Basis

All sources and correlating manure generation volumes were calculated using the SnapPlus manure production estimator; however, 2022, 2023 and 2024 are based on actual amounts of waste generated. As it relates to solids, CP-1 separates its solids for its bedding needs. In 2022 and 2023, unused bedding was either spread on the fields or transferred to an affiliate farm, Pagel's Ponderosa Dairy, LLC, for its bedding needs. CP-2 is utilizing sand for bedding and once a solid separator is installed, it too will be separating its solids for bedding. The waste generation numbers for 2025-2026 are based on the projected animal units for permitting purposes. Manure solids are based on solids being removed from WSF4.

Manure Liquids and Solids Volumes Generated for all Sites and Sources

Year	Manure Liquids & Process Waste Water	Manure Solids
2022	10,770,640 gallons	108 tons
2023	18,479,052 gallons	707 tons
2024	16,945,701 gallons	5,231 tons
2025	52,144,280 gallons	N/A
2026	52,144,280 gallons	N/A

Other Nutrient Sources for Land Application (NRCS 590 Requirement)

All nutrient sources generated, stored or received by the farm, including feed storage leachate and runoff, waste feed, solid storage runoff, septic waste, etc., end up in WSF 2 and 6, respectively. All nutrient sources generated or received by Coleman Ponderosa have been included in the total manure and process wastewater volume calculations within this NMP. Please refer to the SnapPlus nutrient source and manure production estimator and Section 6 of the plan for calculations of other nutrient sources of waste to be land applied to the fields.

Amount of manure, process wastewater and other sources to be land applied

Please refer to Section 6 of the plan for calculations/analysis for table values and Section 5 of the plan for land application schedules for specific fields. The numbers in 2022, 2023 and 2024 below are based on the actual hauling logs. There was an increase in solid manure in 2023 and 2024 due to the sand being removed from WSF4. Manure solids are based on solids being removed from WSF4. The numbers for 2025-2026 years are the projected amounts.

Total Planned Manure, Process Wastewater and Other Sources to be Land Applied

Year	Total Liquids created	Total Liquids applied	Total Solids created	Total Solids applied
2022	10,770,640 gallons	10,770,640 gallons	108 tons	108 tons
2023	18,479,052 gallons	18,479,052 gallons	707 tons	707 tons
2024	16,945,701 gallons	16,945,701 gallons	5,231 tons	5,321 tons
2025	52,144,280 gallons	52,636,381 gallons	N/A	N/A
2026	52,144,280 gallons	53,503,750 gallons	N/A	N/A

Coleman Ponderosa anticipates applying manure according to the following schedule: Spring applications to planned corn field and alfalfa seeding fields. Summer applications to hay fields as weather allows. Fall applications to corn fields. There will be no planned winter spreading. Please refer to Section 5 of the plan for land application schedules for specific fields. Please also refer to Section 3 of the plan for map and field verification procedures that will be followed to verify areas of fields are not prohibited from manure spreading and NR 243 or NRCS 590 setback requirements are followed.

Coleman Ponderosa anticipates using the following equipment to spread liquid and solid manure on fields in the plan: Surface manure spreaders or liquid injectors for liquid manure and process wastewater; surface spreaders for all solid manure. In the fall and spring, liquid manure will be either injected as much as possible or incorporated immediately (SWQMA) or within 48 hours of surface application (non-SWQMA) whichever applies. All liquid or solid manure not injected will be incorporated with a disk till, or in the case of no-till or alfalfa it will be surface applied in accordance with all NR 243 and NRCS 590 rules. In the summer, liquid manure may be top dressed on some alfalfa fields. Liquid manure spread on Coleman Ponderosa's fields is hauled and applied by Coleman Ponderosa's personnel and Waste Control Services, Inc. of Bonduel ("WCS") and/or Dvorachek Farm & Industry, LLC of Brillion ("Dvorachek") (WCS and Dvorachek are collectively referred to herein as the "custom applicators"); however, in light of the recent expansion of CP-2, the farm is looking at possibly adding or changing a custom applicator to ensure the farm's hauling needs are met.

Other methods of use, disposal, distribution or treatment of manure or process wastewater

Coleman Ponderosa does not plan any other methods of use, disposal, or distribution of manure or process wastewater.

Total acreage available (by landowner) for land application owned, rented or in ‘agreements’.

The table below summarizes this information. Please refer to this paragraph of the narrative for more information related to land base documentation. The farm has a total of approximately 6,474 spreadable acres after various restricted areas have been accounted for.

Total land acres available – 7,402

- Acres owned – 677
- Acres Rented/under Agreement – 6,725

<u>Land Owner Name</u>	<u>Field Name</u>	<u>Acres</u>	<u>Rental or Agreement Length</u>	<u>Length</u>	<u>Shared Land* Y/N</u>
Coleman Ponderosa	All CP Fields, CP 20-21 ownership of land is split. CP 22 3 ac owned; rest is MNR Back 40.	677 acres	Owned land	N/A	N
Reginal Comins	RC 1-2	87 acres	Rental	5 years - ongoing	N
Dennis Fiedorwicz	GF 1-2-3-4	37 acres	Rental	5 years - ongoing	N
Lynn Hoida	JH 1-2-3-4	66 acres	Rental	4 years - ongoing	N
Marcia Gabriel	MG 1-2-3-4	16.4 acres	Rental	5 years - ongoing	N
Martin Brown	MB 1-2	62 acres	Rental	5 years – ongoing	N
Brian Osterberg	BO 1	8.7 acres	Rental	5 years – ongoing	N
Richard Rysewyk	RR 1-2-3-4	116 acres	Rental	5 years – ongoing	N
Jeff Martin	JM 1	32 acres	Rental	5 years – ongoing	N
Dan Rosner	DR 1	97 acres	Rental	5 years – ongoing	N
Howard Patz	HP 1	64 acres	Rental	5 years – ongoing	N
Billy Cumins	BC 2	37 acres	Rental	2 years	N

MNR Back 40	MR 1, CP 22	125 acres	Rental	5 years – ongoing	N
Harold Patz	HRP 1, CP 20-21 Partial	95 acres	Rental	5 years - ongoing	N
Ken Brosig	KB 1-2-3	65 acres	Rental	5 years - ongoing	N
Peter Stank	SP 1-2-3-4-5-5A-6	188 acres	Manure Agreement/Rental	ongoing	Y
Betty Jashinsky	J-1	28 acres	Rental	5 years - ongoing	N
Eric Stank	ES 1	20 acres	Manure Agreement/ Crop Purchase	ongoing	Y
Jerid Wos	All fields labeled Jerid Wos	2,176 acres	Manure Agreement/ Crop Purchase	ongoing	Y
Kuchta Farms	Separate SnapPlus Database	1,908 acres	Manure Agreement	ongoing	Y
Noll Farms	All fields labeled NF & NK	603 acres	Manure Agreement	ongoing	Y
Jagiello Dairy	JD KNorth 6	87 acres	Manure Agreement	ongoing	Y
Steve Brye	SB 1-2	68 acres	Manure Agreement/ Crop Purchase	ongoing	Y
Jim Hallada	Fields labeled with “Jim Hallada”	93 acres	Manure Agreement/ Crop Purchase	ongoing	Y
Mark Hallada	Fields labeled with “MH”	189 acres	Manure Agreement/ Crop Purchase	ongoing	Y

Aaron Behnke	Fields labeled with "AB"	324 acres	Manure Agreement/ Crop Purchase	ongoing	Y
Dan Rosner	Cathouse 60-61, House 69, Sailor 63	133 acres	Subleasing/Renting	Rental	N

NOTE: *Shared land means fields that may receive nutrients from more than one farm or nutrient source (e.g., manure, industrial wastewater, commercial fertilizer, septage, etc). These fields must be carefully tracked within the NMP.

Tillage and crop rotation information for all fields owned or rented or in 'agreements'
Please refer to Section 5 of the plan for tillage, crop rotation and land application schedules for specific fields.

Nutrient crediting requirements - NR 243.14(3)

When selecting manure and process wastewater application rates for all fields, Coleman Ponderosa has taken into account:

1. soil nutrient levels prior to land spreading
2. known nutrient applications from other sources, including:
 - a. commercial fertilizers
 - b. bio-solids
 - c. **first and second year** manure and legume credits
 - d. Other sources of nutrients that are expected to be applied or have already been applied to fields.

Adjustments will be made to assumed nutrient credits based upon actual crop yields.

SWQMA application restriction option for each field AND procedures- NR 243.14(4)

For all fields, except those with alfalfa crop in rotation, Coleman Ponderosa will follow SWQMA option 1 - no application of manure or process wastewater within 25 feet of a navigable water, conduit to navigable water or wetland; and inject or immediately incorporate manure and process wastewater in all other areas within the SWQMA.

For fields with alfalfa crops in rotation, Coleman Ponderosa will follow SWQMA option 5 – No application of manure or process wastewater within 100 feet of navigable water or conduit to navigable water or long-term no till. 25 foot setback with 30% or greater residue at the time of application.

Phosphorus delivery method (r P Index) and P management procedures for each field- NR 243.14(5)

Coleman Ponderosa will use the P Index for all fields within the NMP. Please refer to Section 5 of the plan for this information.

Coleman Ponderosa will follow the P Management procedures listed below when applying manure and process wastewater to fields to demonstrate compliance with NR 243.14(5)(b) and applicable NRCS 590 requirements:

Fields with less than 50 ppm:

- N application rates allowed up to the N needs of the following crop or the N removal of the following legume crop.

OR

- Rotational average PI values for each field shall be 6 or lower. PI is calculated using up to 8 year rotation using current Wisconsin P Index calculations. P applications on fields with PI > 6 may be made only if additional P is needed according to UWEX soil fertility recommendations.

Fields with soil test P between 50-100 ppm:

- P application shall not exceed the total crop P removal for crops to be grown over maximum 8 year rotation.

OR

- Rotational average PI values for each field shall be 6 or lower. PI is calculated using up to 8 year rotation using current Wisconsin P Index calculations. P applications on fields with PI > 6 may be made only if additional P is needed according to UWEX soil fertility recommendations.

Fields with soil test P between 100-200 ppm:

- The rotational average P Index value for the crop rotation or for the next 4 year period, whichever time period is less, will be calculated.
- When P Index is > 6, manure application(s) to field are prohibited.
- When P index is < 6, manure applications allowed with P drawdown by 50% cumulative crop removal over a maximum 4 year rotation will be implemented.

Fields with soil test P greater than 200 ppm:

- P applications from manure and process wastewater prohibited, unless approved by DNR.
- The planned average WI P Index value for the crop rotation or for the next 4 year period, whichever time period is less, will be calculated.
- P drawdown by 50% cumulative crop removal over a maximum 4 year rotation will be implemented.

Soil Test P fields

All fields using soil test P will be included within a **current** conservation plan for Coleman Ponderosa, or use the erosion assessment tools included with the P Index model. Coleman Ponderosa conservation plan meets the NRCS 590 criteria (V.C.2.b) below and addresses all soil erosion consistent with **current crops** and **management** or uses the erosion assessment tools included within the WI P Index model.

NRCS 590 Conservation Plan Criteria - (V.C.2.b)

The plan must be developed by and field verified by a conservation planner to document crop management and the conservation practices used to control sheet and rill erosion to tolerable levels (T) and to provide treatment of ephemeral soil erosion.

- The conservation plan must be signed by the land operator and approved by the county land conservation committee or their representative.
- A conservation planner must develop conservation plans using the minimum criteria found in the USDA, NRCS National Planning Procedures Handbook and the WI Field Office Technical Guide.
- In crop fields where ephemeral erosion is an identified problem, a minimum of one of the following runoff reducing practices shall be implemented:
 - Install/maintain contour strips and/or contour buffer strips.
 - Install/maintain filter strips along surface waters and concentrated flow channels that empty into surface waters that are within or adjoin areas where manure will be applied.
 - Maintain > 30% crop residue or vegetative cover on the soil surface after planting
 - Establish fall cover crops.

All fields using soil test P that have a high potential to deliver phosphorus to 303(d) listed waters impaired by nutrients or outstanding and exceptional resource waters, shall be managed by Coleman Ponderosa to ensure:

- (1) Soil test P levels shall not increase over a crop rotation unless DNR provides written approval.
- (2) Same fields that have soil test phosphorus below optimum levels, soil test P levels shall not increase over a rotation above the optimum level for the highest demanding phosphorus crop in a rotation.

Field proximity to nutrient impaired or outstanding/ exceptional waters - NR 243.14(5)

Please refer to Section 3 of the plan for maps showing locations of fields in proximity to these types of waters. Coleman Ponderosa uses SnapMaps to generate these maps.

Identification of sites for winter (frozen or snow covered ground) spreading – NR 243.14(8)

Coleman Ponderosa does not plan to spread manure onto fields during winter (frozen or snow covered ground) conditions. Emergency winter spreading maps were developed for this permit renewal.

For compliance with NR 243.14(8) winter spreading sites requirement, fields CP-1&2, CP-6, CP-8, CP-9&10, CP-11, CP-12, CP-14, CP-15, RR-1, and RR-2, have been selected for winter application(s) if application(s) of liquid or solid manure become necessary. Fields CP-1&2, CP-6, CP-8, CP-9&10, CP-11, CP-12, CP-14, CP-15, RR-1, and RR-2, have been evaluated by Coleman Ponderosa to meet the NR 243 criteria in Tables 4 and 5 for manure and criteria in 214.17(2) and (6) for process wastewater. Coleman Ponderosa has also determined these fields represent the lowest pollutant delivery to waters of the state and have winter acute loss index value of 4 or less using the Wisconsin Phosphorus Index. In addition Coleman Ponderosa will

evaluate these same fields at time of manure application to determine if conditions are suitable for applying manure and complying with the requirements of NR 243.14(8). All the fields listed are B slopes 2-6 %, the Emergency winter spreading rate will not exceed 3,500 gallons per acre.

Manure Stacking – NR 243.141

Coleman Ponderosa does not plan to use manure staking sites, and therefore, there are no sites approved by the Department at this time. If the farm decides to have manure stacking sites, it will submit the requisite information to the Department for approval in advance of using any manure stacking sites.

Documentation of 180 days storage and methods for maintaining storage - NR 243.14(9) and NR 243.17(3)

Please refer to the farm's annual report which was filed with the Department on or around January 31, 2025 for manure storage capacity calculations. Please refer to Section 5 of the plan for land application schedules for specific fields – this schedule demonstrates how Coleman Ponderosa will maintain 180 days storage capacity over time.

General Manure and process wastewater application requirements – NR 243.14(2)(b)(1-13)&(c-f)

Coleman Ponderosa will take several actions to ensure all manure and process wastewater is land applied in compliance following general land spreading requirements of NR 243.14:

- No ponding on application site.
- During dry weather, no runoff from the application site, nor discharge to waters of the state through subsurface drains.
- No causing fecal contamination of water in a well.
- Unless a rain event is greater than 25 yr/24 hr event and the farm complies with NMP and WPDES permit, no runoff from the application site, nor discharge to waters of the state through subsurface drains due to precipitation or snowmelt.
- No application on saturated soils.
- Maximize use of available nutrients, prevent delivery of manure and process wastewater to waters of the state, and minimize the loss of nutrients and other contaminants to waters of the state to prevent exceedances of groundwater and surface water quality standards and to prevent impairment of wetland functional values.
- Retain nutrients in the soil with minimal movement.
- No application within 100 feet of direct conduits to groundwater.
- No applications within 100 feet of private well and 1000 feet of commercial well.
- No application on fields with soils that are 60 inch thick or less over fractured bedrock when ground is frozen or where snow is present.
- No application when snow is actively melting such that water is flowing off a field.

Please refer to Section 3 of the plan for spreading maps that visually describe how the farm will meet many of these general spreading requirements.

To demonstrate compliance with the NR 243.14 general land application requirements above, Coleman Ponderosa will complete, on an ongoing basis, map and field verification procedures

(listed below) to ensure spreading maps are accurate (including soil types, slopes and slope lengths), SWQMA or well setback distances are followed and prohibited conditions/features on fields are identified and avoided when spreading manure or process wastewater to NMP fields. The procedures demonstrate how land application activities will be in compliance with NR 243.14 or NRCS 590 restrictions throughout the permit term. Coleman Ponderosa uses its own Manure Application Checklist / Loadsheet that is completed before, during and after manure applications.

The prohibited conditions/features that Coleman Ponderosa will evaluate for on each field include: ephemeral erosion or concentrated flow channels, saturated soils, intermittent and perennial streams, grassed waterways, wetlands, lakes, drinking wells, areas of field with bedrock or groundwater within 24 inches of field surface, wells and other direct conduits to groundwater - NR 243.14(2)(b)(3),(5),(6), (7-12). These areas have been inventoried and marked on restriction maps (see Section 3 of the plan).

Coleman Ponderosa will maintain written and/or visual records of ongoing field and map verification actions to demonstrate compliance with NR 243.14 requirements. Please refer to Section 7 of the plan for this information.

Field and Map Verification Procedures

All Coleman Ponderosa and WCS manure handling personnel participate in annual training offered through the UW Extension Office for manure applicator training. Prior to spreading manure onto fields, Coleman Ponderosa staff or custom applicators will complete the following map and field verification procedures to ensure all manure spreading will be in compliance with NR 243 and 590 criteria:

- Spreading maps will be reviewed by Coleman Ponderosa and custom applicators to identify all restricted or prohibited features and setback distances on field.
- Fields will be inspected for restricted or prohibited features; any new conditions/features will be identified.
- Once identified, prohibited field features will be avoided and setback distances (as depicted on spreading maps or in NR 243 or NRCS 590) will be measured and followed during manure spreading.
- Spreading maps will be updated with any new prohibited/restricted field features or conditions.
- The farm's Manure Application Checklist / Loadsheet will be used to track the map and field verification procedures listed above. The checklist will track:
 - (a) date(s) review took place;
 - (b) person(s) involved;
 - (c) fields verified;
 - (d) any new field features or conditions identified on fields; and
 - (e) photos or other documentation of field features or conditions reviewed.

Avoiding manure or process wastewater field runoff or ponding– NR 243.14(2)(b)(1), (2)&(6).

Please refer to field and map verification procedures and NRCS 590 requirements for runoff and ponding.

Surface applications & precipitation forecast for runoff within 24 hours – NR 243.14(2)(b)(13)

For this NMP, **surface** applications of manure will not be completed when rain events above 1 inch are forecasted within 24 hours of the time of planned applications. Surface application means manure that is applied and left on the surface of the field. Surface application does not mean manure that is surface applied and then incorporated into the soil.

Prior to manure applications to fields, the Wisconsin Manure Management Advisory System will be used to make a spreading decision. This information will be used to determine the risk for forecasted precipitation to cause run-off from fields. Weather at the time of application is recorded on the farm's Manure Application Checklist / Loadsheets and then inputted on a SnapPlus generated daily spreading log for the farm's use. The farm's daily spreading log is then uploaded into the SnapPlus "Daily Spreading Log for Manure".

Drain tile fields & tile discharges to surface waters -NR 243.14(2)(b)(2),(4)&(6) and NRCS 590 (V.A.1.k)

Drain tile discharges of manure and process wastewater from fields to surface waters are not allowed under NR 243. The following fields have been identified to have drain tiles: CP-1&2, CP-6, CP-7, CP-8, CP-12, RC-1, RC-2, Jerid Wos 155, Jerid Wos 156, Alsteen, Kushavas, Kushavas East, Boehm and Roenfranz. Please see Section 3 of the plan for additional drain tile field information. Drain tile discharges of manure and process wastewater to surface waters will be prevented or responded to by Coleman Ponderosa via the following procedures:

Prior to spreading manure onto fields with drain tiles:

- Spreading maps will be reviewed to identify known drain tile locations.
- Fields will be inspected for drain tile presence or outlets; any new tile outlets/subsurface drainage systems will be identified.
- All tile outlets will be visually checked for flow and water conditions (e.g., clear, colored, foam, odor, etc).
- Results of all visual tile monitoring will be tracked – using the farm's Manure Application Checklist / Loadsheets.
- Planned manure spreading (rates and locations) on fields will be evaluated and then limited or adjusted, as necessary, according to the following criteria:
 1. Available water holding capacity of the soil.
 2. Depth of injection.
 3. Clay soil considerations.
 4. Concentration of Application from spreading equipment type used
 5. Are known tile drains flowing?

6. Shallow tillage (3 to 5 inch depth) used or not used prior to application to disrupt the continuity of worm holes, macropores and root channels (preferential pathways) to reduce the risk of manure reaching drain lines.
7. Perennial Crop and No Till precautions.

During and after manure spreading on fields with drain tiles, best management practices will be followed:

- Visual inspection of tile outlets for flow and water conditions (e.g., clear, colored, foam, odor, etc.).
- Containing manure or process wastewater tile discharges from release into waterway(s).
- Notifying DNR of any spills/discharges to waterways from tiles.
- Reducing application rates or delaying application(s) to tiled fields.
- Setbacks from tiled areas.
- Immediate tillage/ incorporation of applied manure.
- Use of other manure application equipment (e.g., sweeps).
- Update NMP spreading maps or narrative.
- Results of visual inspections of tiles will be tracked – using the farm’s Manure Application Checklist / Loadsheets.

Please also refer to NRCS 590 requirements for field runoff, ponding and drainage to subsurface tiles.

Manure applications to areas of fields with shallow groundwater or bedrock – NR 243.14(2)(b)(7).

NR 243 prohibits manure applications on areas of fields that have groundwater or bedrock within 24 inches of the field surface *at time of application*. Coleman Ponderosa will demonstrate compliance with this prohibition by implementing the WDNR / Bureau of Watershed Management Interim Guidance “Nutrient Management – CAFO Applications on Shallow Groundwater Soils” dated March 2009, and by not spreading on areas deemed shallow to bedrock without proper verification and working with the WDNR and local conservation offices. The following fields are less than 20 feet to Silurian bedrock: CP 19 and CP 6; Jerid Wos 100-105, 14-126, 156, 26, 51A and B, 53-57A; Boehm and Frievalt Steve; and NK Jimbo and NK Kempka.

Liquid manure applications on such fields must be incorporated / injected with pre-tillage unless applied to a growing crop or to a field in long-term no-till.

Daily Spreading Log and Annual Reports for DNR – NR 243.19

Coleman Ponderosa will maintain a daily spreading log (which contains data from its Manure Application Checklist / Loadsheets) for all manure or process wastewater applications to NMP fields for compliance with NR 243.19. The daily spreading log will also be used to complete required annual reports for the WDNR. Coleman Ponderosa condenses the information from its daily spreading log and inputs the information into SnapPlus to generate the SnapPlus Annual Spreading Report. Coleman Ponderosa recognizes the daily spreading log and annual reports are essential to document actual management practices used by Coleman Ponderosa and the resulting

soil erosion and water quality impacts on specific fields. Please refer to Section 7 of the plan for this information.

Manure spreading equipment calibration and Manure concentration testing – NR 243.19

Coleman Ponderosa's staff or the custom applicators, as the case may be, shall conduct or require periodic inspections and ongoing calibration of land spreading equipment to detect leaks and ensure accurate application rates for manure and process wastewater. Coleman Ponderosa uses a simple system of counting loads and spreading to the end of the field for their liquid and solid spreaders. Initial calibrations shall be followed by additional calibration after any equipment modification or after changes in manure or process wastewater consistency and/or source. At a minimum, calibration of all manure spreading equipment used by Coleman Ponderosa or the custom applicators shall be completed annually and recorded. Please refer to Section 8 of the plan for equipment calibration records.

Coleman Ponderosa shall analyze all manure and process wastewater sources applied to fields in accordance with WPDES permit conditions. Samples shall be collected so they are representative of all manure or process wastewater sources applied to fields. All manure and process wastewater sources shall be analyzed for Nitrogen, Phosphorus, and percent solids in years where manure and process wastewater is applied. Coleman Ponderosa will sample two times per month when a liquid manure hauling event occurs and two times quarterly if a solid manure hauling event occurs. Please refer to Section 4 of the plan for manure and process wastewater sampling records and related information.

Wisconsin NRCS 590 Requirements

Dominant Critical Soil

Each field in this NMP is managed to meet NRCS dominant critical soil criteria. The dominant critical soil is the most erosive soil that covers at least 10% of the field area. The dominant critical soil type was selected for all fields listed in the NMP to ensure corresponding rotational T – tolerable soil loss - values for each field are accurate for compliance with NRCS 590 requirements. Please refer to Section 5 of the plan for this information.

T – Tolerable soil loss

Each field in this NMP is managed to meet T – tolerable soil loss - over the crop rotation. T values were calculated using NRCS RUSLE 2 model. No nutrient applications (manure, fertilizer) are allowed on fields that fail to meet T. Erosion controls shall be implemented so that tolerable soil loss (T) over crop rotation will not be exceeded on fields that receive nutrients. Please refer to Section 5 of the plan for information showing each field's tolerable and actual soil loss.

Soil Testing

Each field in the NMP is managed for compliance with NRCS A2100 soil testing criteria. Accordingly, all fields in this NMP either meet or are managed to meet A2100 criteria over time. Please refer to Section 4 of the plan for this information. For fields in this NMP that do not currently meet A2100, one of the following management options will be implemented by the farm until soil testing can be completed:

1. Manure will not be applied to field;
2. Field will be managed as if P levels are greater than 100 ppm P according to NR 243.14(5) criteria for all manure applications to field.

Application and budgeting of nutrients – consistent with NRCS 590 standard and soil fertility recommendations found in A2809.

Each field in the NMP is managed to address the source, rate, timing, form and method of application and budgeting *of all* nutrient sources (i.e., including soil reserves, commercial fertilizer, manure, organic byproducts –animal mortality and composting materials - legume crops and crop residues) generated or accepted by the farm and applied to fields. Please refer to Sections 5 and 6 of the plan for this information.

Other sources of nutrients to be land applied (NRCS 590 requirement)

Please refer to Section 4 of the plan for calculations/analysis for table values and Section 5 of the plan for specific field land application amounts and schedules (e.g., spring, summer or fall).

Crop Yield Goals

Each field in the NMP is managed according to yield goals that are attainable by the farm under average growing conditions and established using multiyear documented yields kept by the farm. Farm yield goals in this NMP shall not be set higher than 15% above the previous 3-5 year average. Absent field/farm specific yield goals data, yield goals in this NM plan will be set using

Wisconsin county average crop yields found at National Agricultural Statistics Service. Please refer to Section 5 of the plan for this information.

Records of soil and manure testing results

Coleman Ponderosa has completed and retained records showing recent soil testing and manure testing results. Please refer to Section 4 of the plan for this information. Coleman Ponderosa acknowledges that there are too few of soil samples for fields AB Schlosser 1 and Jerid Wos-109. Soil samples for these fields will be obtained when soil conditions are favorable this spring.

Coleman Ponderosa will adhere to the following schedule to ensure manure analysis or soil testing for fields will be completed and then the NMP will be updated with this information:

- Liquid manure will be sampled twice per month as spreading occurs;
- Solid manure will be sampled twice per quarter as spreading occurs; and
- Every four years, soil samples will be taken on each field.

Fields with concentrated flow channels resulting in reoccurring gullies or ephemeral erosion

Coleman Ponderosa will evaluate fields on an ongoing basis each year for presence or flow channels or other types of ephemeral soil erosion. If fields show evidence of concentrated flow channels resulting in re-occurring gullies or ephemeral erosion, the following actions will be taken by the farm:

- Spreading maps will be updated to reflect areas with concentrated flow channels;
- Manure will not be spread on fields with concentrated flow channels, until perennial vegetative cover is established in all areas of concentrated flow;
- A schedule for establishing perennial vegetative cover in all areas of concentrated flow as well as implementation dates will be recorded and kept with this NMP.
- One or more NRCS 590 runoff reducing practices for crop fields with ephemeral erosion will be selected and implemented. Practices selected and implementation dates will be recorded and kept with this NMP.

Once vegetated flow channels/grassed waterways are established within fields, such areas will be maintained to perform their intended function and manure will not be applied within these areas. Soil erosion areas shall be stabilized with perennial vegetative cover during a dry time within the growing season.

Fields with high potential for N leaching to groundwater - soil temperature, application rate and timing restrictions

Fields in this NMP have been evaluated for soils with high potential for N leaching to groundwater for compliance with NRCS 590 requirements. Please refer to Sections 3 and 5 of the plan for this information. When manure is applied, fields with soils classified as having a high potential for N leaching to groundwater and the soils are > 50 degrees F, the potential exists for rapid N mineralization. The risk for N mineralization and loss (via leaching to groundwater) is a concern the farm will manage for by using Nitrogen stabilizer and cover crops. If soil temperatures are found to be 50 degrees or higher, Coleman Ponderosa may delay application or reduce application rates following Section V, B, 2 of NRCS 590 standard. As such, Coleman

Ponderosa will use the Wisconsin Manure Advisory System to monitor soil temperatures prior to field applications in late summer or fall.

Field Inspection and Response Procedures for manure ponding, runoff from fields or drainage to subsurface tiles.

Coleman Ponderosa or the custom applicator, as the case may be, will evaluate field and weather conditions prior to and during mechanical applications of manures, organic byproducts and fertilizer to ensure that applied material(s) do not cause ponding, runoff, or drainage to subsurface tiles.

The following response procedures will be followed by Coleman Ponderosa if/when ponding, runoff or drainage to subsurface tiles occurs during and/or after applications to fields:

1. Stop application immediately (if field application not finished)
2. Containment measures (e.g., earth berms, pumps, temporary pits, tillage, incorporation) will be implemented immediately to prevent off-site movement from field.
3. Changes in application rate, method, depth of injection or timing to the field shall be implemented during any future application to eliminate ponding, runoff or drainage to subsurface tiles.
4. Farm shall notify DNR of any spills or accidental release to comply with Ag Spill Law (289.11) or term of WPDES permit.

Annual Updates

This NMP will be updated annually. Each NMP annual update for Coleman Ponderosa shall include records/documentation of all soil or manure analyses as well as crops, tillage, nutrient application rates, and methods actually implemented on each field that receives nutrients. Annual updates are essential to document actual management practices and resulting soil erosion and water quality impacts on specific fields.