



December 20, 2021

RON KNOCHE, P.E.
DIRECTOR OF TRANSPORTATION AND RESOURCE MANAGEMENT
410 E. WASHINGTON
IOWA CITY, IA 52240

RE: City of Iowa City Sanitary Landfill
Permit No. 52-SDP-01-72P

Dear Mr. Knoche:

The Iowa Department of Natural Resources (DNR) has recently received a complaint regarding nuisance bird activity at their home which has been attributed to operations at the landfill. This complainant has previously made similar claims.

DNR does not possess the technical expertise to either independently verify or deny this specific claim that the bird nuisance problem is attributable to the landfill. Nor do we possess the expertise to recommend specific actions that could be taken by the permit holder to address any such problems, if verified.

However, what we do know is that all landfills, including the Iowa City Landfill, tend to attract birds to some extent, at least seasonally, which is why we have the following rules to deter their attraction:

- 567 IAC 113.8(2)d(4) requires that the working face be operated to prevent harborage of vectors and minimize the attraction of vectors; and
- 567 IAC 113.8(3)e requires the prevention or control of on-site populations of vectors using techniques appropriate for the protection of human health and environment.

Additionally, with the proposed Northeast Landfill Expansion and projected population growth in the Iowa City area, which is expected to result in both increased waste generation and additional residential development encroachment, this issue is unlikely to subside in the future. Because of this, DNR believes that we should take this opportunity now to proactively deal with potential bird vector issues at this site.

Therefore, DNR is requiring you to retain a professional, qualified biologist or bird management expert to assess landfill operations and determine whether bird harborage or attraction exists at the landfill, seasonal or otherwise, that could be further prevented, minimized, or controlled as required in the above rules. If such harborage or attraction is identified, and the expert recommends specific actions that could be taken with a reasonable expectation of success, DNR

expects the permit holder to proceed with the development of a formal bird management plan to be incorporated into the permit.

While the above actions represent our preference, please be aware that we would also accept proceeding directly to the development of a bird management plan. We offer this option in further recognition of our lack of experience with this issue.

Please respond to this letter by January 28, 2022.

If you have any questions please contact me at mick.lead@dnr.iowa.gov or (515) 689-6548.

Sincerely,

Michael B. "Mick" Lead
Land Quality Bureau

copy: Jennifer Jordan
Iowa City Landfill and Recycling Center
3900 Hebl Avenue SW
Iowa City, IA 52240

DNR Field Office #6