Brainstorming of Issues

Not Reliable

Facilities and Equipment:

- Data Incompatibility (different maps and different software)
- Not clear what to use for navigable water maps
- Soil surveys inadequate for use as a regulatory tool
- Inconsistent field numbering system
- Equipment changes
- Equipment isn't always calibrated
- Well maps aren't adequate
- Tile inlet maps aren't adequate
- Timing of soil tests (spring or fall) affects results

Procedures:

- Non-homogeneous manure
- "W" soils verification varies
- Record keeping is not standardized
- DNR templates are not being used
- Applying on non-frozen ground or frozen ground risk is different
- RUSLE2 and SNAP+ are not at the same level
- No GIS layer for routing water
- Default is not always field verified by consultant but used anyway

Policies:

- NRCS Standard 590 is not a water quality standard
- Need more guidance on (concentrated flow channels – when to used grassed waterways vs. plowing through; what needs to be in plans; requirements can still be confusing; applying nutrients based on crop removed; "w" soils; etc.)

Workforce:

- DNR cursory review is not reliable measure of plan compliance
- Crops change because of markets and this requires a plan change
- Farmer doesn't understand why accuracy is needed
- Communication between all parties (farmer, consultant, manure hauler) is poor
- DNR doesn't come out and do inspections.

Brainstorming Issues Cont.

Plan Takes Too Long

Facilities and Equipment:

- Printing all the copies
- Juggling satellite farms
- Documenting what really gets applied rather than what is planned
- Soil testing and bedrock testing processes are not all agreed on

Procedures:

- Compliance plan doesn't work as an implementation plan (need an implementation plan)
- Not being allowed to use a mass balance approach vs. a 5-year plan when there is more than enough land to spread on.
- Generating five years of crop rotations and manure applications when the next year it will change
- Farmer wants to keep changing the plan
- Regulations at the local, state and federal levels vary enough to make it difficult
- Farmer wants flexibility
- Procedures to verify bedrock is not well defined
- SWQMA maps can be confusing for intermittent streams
- Soil testing takes time
- Field verification (drawing the maps)
- Have to go beyond the Std. 590 requirements to meet NR 243

Policies:

- Guidance on SWQMA and navigability needs better definition
- Full review of a plan is time consuming
- NR 243 doesn't require tracking of commercial fertilizer, just manure
- Timing of soil tests is critical to outcome but soil surveys are not always accurate

Workforce:

- Growers don't understand what all goes into a plan
- Growers want to be able to change the plan frequently
- Growers don't provide data or they don't provide accurate data to do the plan
- DNR reviewers keep changing
- Consultants that do NMPs are busy doing other agronomic work at critical times
- Workload is too much for the number of reviewers and developers