

## Response Actions to Report Findings – Implementation Plan

The two tables below describe short term and long term response actions to many findings of this report. Some actions the department can complete alone, while other actions will require collaboration with others to complete the action(s). The department intends to verify, and possibly revise, these response actions for completion on an ongoing basis (schedule to be determined at later date).

DNR = Department of Natural Resources

UW = University of Wisconsin Soils

NRCS = Natural Resources Conservation Service

DATCP = Department of Agriculture Trade and Consumer Protection

### Short-Term Actions – 12 months, or less

Goal	Action	Who	When
Record keeping is time consuming	Create Daily Manure Application Log within SNAP+	DNR UW	Sept 2012
Record keeping is time consuming	Encourage or require all CAFO farms to use existing NM plan templates and forms	DNR	Sept 2012
Make NM Plans More Reliable	Develop more standard tools and templates for CAFO NM plans	DNR UW	Sept 2012
Make NM Plans More Reliable	Create guidance for CAFOs applying manure on shallow bedrocks soils	DNR	Dec 2012
Make NM Plans More Reliable	Amend SNAP+ to reflect crop nutrient recommendations for Predominant vs. Dominant critical soils	DNR UW	Sept 2012
Shorten time to develop and review NM plan	Option for SNAP+ users to select field attributes within SNAP+ manually and have automatic spreading restriction flags/notices	DNR UW DATCP	Sept 2012
Shorten time to develop and review NM plan	DNR on-line file sharing, application submittal and posting (Sharepoint project)	DNR	Dec 2012
Shorten time to develop and review NM plan	DNR management approves filling one vacant DNR CAFO position and three vacant DNR non-point coordinator positions to reduce workload on existing DNR CAFO staff.	DNR	Dec 2012
Shorten time to develop and review NM plan	DNR utilizes central intake CAFO position for NM plan submittals; assigns single reviewer and tracks until approval.	DNR	Sept 2012
Shorten time to develop and review NM plan	Adopt standard operating procedures for DNR staff to track, review, approve or reject NM plans within 60 days	DNR	Dec 2012
Shorten time to develop and review NM plan	Reform NR 243 checklist to remove repetitive questions. (Checklist was developed to improve NM plan submittals; will be used for completeness determination; appears to be improving quality of submittals)	DNR	Sept 2012
Shorten time to develop and review NM plan	Require all CAFO NM plans use DNR standard NM plan narrative (or equivalent)	DNR	Sept 2012
Operational Flexibility	DNR guidance for mass balance approach for manure instead of requiring five-year manure allocation	DNR	2013
Operational Flexibility	Allow for adaptive management related to yields and crop nutrient recommendations – CAFO Advanced Ag Research	DNR UW	2013

	Exemption. CAFO farm must first apply for exemption and agree to meet DNR conditions for approval.	NRCS	
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### Long-Term Actions – more than 12 months

Goal	Action	Who	When
Record keeping is time consuming	Create a hand-held application for farmers/manure haulers that interfaces with SNAP+ software; requires funding source; alternative to excel.	UW DNR + others	2014-2015
Record keeping is time consuming	Evaluate Green Tier approach for record keeping system deemed equivalent (proven performance required – would need to set up a team to review how this could be implemented)	DNR + others	2015
Record keeping is time consuming	Create computer programs compatible with SNAP+, maps used in NMP and with farm tractor equipment; software interface issues with SNAP+ are critical	DNR UW DATCP	2020
Make NM Plans More Reliable	Develop better guidance/tools for fields with multiple soils and productivity needs – requires UW and NRCS collaboration (possible under WI NRCS 590 revision?)	DNR UW, DATCP NRCS	2014
Make NM Plans More Reliable	Update DNR “W” soils guidance for CAFOs - based on recent collected depth verification data within various counties. Create “W” soils spatial tool – have soils on map (like network with weather), take farm data into account to determine when depth verification can stop	DNR  DNR+ others	2014  2014
Make NM Plans More Reliable	Coordinate with other county permits and field evaluations. (Requires forming a team to look at efficiencies of use of existing data and collection of data for slopes, soils, waterways) (590 Tech Note?- 2014)	DNR, NRCS, DATCP, WLWCA	2014-2015
Make NM Plans More Reliable	Create auto map selection feature for CAFO SWQMAs within SNAP+ and revise DNR SWQMA CAFO guidance	DNR UW	2014-2015
Make NM Plans More Reliable	Revise SNAP+ to include standard CAFO SWQMA language when SWQMA selected by CAFO user	DNR UW	2013
Make NM Plans More Reliable	Amend NRCS 590 standard or its Technical Note to include winter spreading and additional groundwater protection requirements	DNR NRCS DATCP	2014
Make NM Plans More Reliable	Adopt UW amended Nutrient Application guidelines for field, vegetable and fruit crops in Wisconsin (A 2809) to reflect manure crediting and availability if UW research warrant changes	UW DNR	2013-2014
Shorten time to develop and review NM plan	DNR maintains no vacant positions for CAFO and Non-point Ag staff	DNR	2013-2015
Shorten time to develop and review NM plan	Modify SNAP+ to make it GIS based and improve it for better manure allocation	UW DNR DATCP	2014-2015
Shorten time to develop and review NM plan	Modify SNAP+ to improve access permissions/security to improve review process via on-line application submittal	UW DNR DATCP	2016
Shorten time to	If other actions fail to work, DNR evaluates use of certified	DNR	2016

develop and review NM plan	reviewers instead of DNR reviewers (DNR and DATCP cooperatively review plans)		
Shorten time to develop and review NM plan	If other actions fail to work, DNR offers an expedited review for a fee. Requires statutory change; no fee at all now.	DNR	2016
Shorten time to develop and review NM plan	All state and federal agencies and local authorities agree to have a single set of NM plan requirements for all farms (not just CAFOs); requires applying CAFO requirements to all farms.	DNR DATCP	2020
Shorten time to develop and review NM plan	Data collection from grower/land owner needs to be standardized; Mobile application option?	DNR UW DATCP	2016
Operational Flexibility	Review use of NRCS planning tools for regulation – WI NRCS 590 standard revision	DNR NRCS DATCP	2014
Operational Flexibility	Modify SNAP+ with revised 590 report and/or Manure allocator tool help demonstrate manure allocation over 5 year permit term	DNR UW DATCP	2014-2015
Operational Flexibility	Find alternatives to basing NM plans upon lots of assumptions that result in cumulative error. Explore what other options farmers have if not actual data collection?	DNR UW NRCS DATCP	2016
Operational Flexibility	Allow for adaptive management related to crop yields and nutrient recommendations. Revisions to WI NRCS Standard 590 and Advanced Ag Research Exemption for CAFOs option. Both options require farms to commit to on-site trial strips and track responses	DNR NRCS DATCP	2014
Operational Flexibility	SNAP+ Adaptive Management trials interface – evaluating strip trials requires exact yield measurements to enter into SNAP+. Close coordination with Dr. Carrie Laboski required. SNAP+ can help evaluate economic optimum yield. It will not evaluate maximum yield – this is not the goal	UW DNR	2015-2016