

Comment Summary for CAFO NMP Survey-May 2012

Question 3 Comments: Who ensures that your nutrient applications comply with your NMP?

- My consultant and I half and half.
- we review with our consultant on a ongoing basis
- my consultant tells me how much can be put where.
- Reason clicked 2 - because it's a mutual agreement.
- We both work at it, due to the fact that our plan is fairly flexible.
- I log all manure hat is applied and assure proper amounts are applied
- Our consultant, our operations manager , and myself sit down and decide where and how much we can apply. Then after the application, we all sit down and review what was applied. It is more of a team effort.
- We work with our consultant and keep very accurate records and are fortunate to have a large land base as well.
- my manager
- As the farm owner I see that the gallons per acre reflect what our plan recomends for the next/last crop credited or removed as reported by our consultant

Question 4 Comments: Who maintains the NMP records at your farm?

- Application rates are monitored by me. Consultant makes the recommendations.
- Our consultant maintains all our records but we also keep records at the farm office that we both stay in touch with
- Records are kept at the farm & our consultant coverts them to snap plus.
- I keep a log book of all hfr lots and manure removed from all pits and holding areas

- Again kind of a team approach. The three of us all take parts.
- Staff in our agronomy department along with our office staff work regularly to keep things current.
- "I" means my employee

Question 5 Comments: What do you like most about your current NMP?

- I like DNR forms and the calendar
- all tied together
- Everyone should want to have one.
- Limits my ability to maintain maximum crop yields is bar far my largest concern. This puts me at a competitive disadvantage with my neighbors.
- too much paperwork
- The beneficiary of the NMP is really the crop producer, whereas I am the CAFO who produces the nutrient, yet I am responsible for turning in the NMP. Seems a little backwards.
- all apply to some degree
- On the record keeping side SNAP+ needs to be able to put actual records in and print what DNR Needs. We need an exact place and exact reports to send in or just be able to send in the Snap + file.
- really all of the above are of concern

Question 10: Please add any additional information you'd like to share.

1. I understand about protecting our waters but I wish NMP was for all farmers instead of just the larger ones. I have talked to smaller dairies about what we had to do to be in compliance for cafo and they said they would be able to afford that. Rules and regulations should be a little more farmer friendly and cost effective or a lot of these family farms will be gone. Also about the no spread months. Instead of hauling one or two loads of solid manure a day to a winter spreading field it gets piled. Now

when conditions are right that pile of 100 loads gets hauled and I think the runoff chances are greater than one or two loads a day.

2. Why do I Have to have all this when my dairy farm neighbors dont have to? We follow the nutrient plan to the letter and my 400 cow neighbor spreads 3 times the rate on fields over the fence lines. Its not fair.

3. We need to continue to find ways to stream line data entry. There is no reason to have to enter data multiple times...interface.

4. Reviews and approvals have to be quick, so if changes have to be made they can. Everything has to be kept simple so recording can be done efficiently.

5. I would like to see eased restrictions for hauling liquid manure on W soils. Our farm has a lot of red clay so whenever we haul I check tiles and dig a lot of holes. I never find water in the holes. Why can't W soils be restricted seasonal. Like dig holes in spring because the ground is wet, but not dig in the fall.

6. More flexibility in manure rates for different soil types within a field. Need a different option to handle "W" soils

7. Once a farm shows they have a large enough land base, we think that giving more than one forward years crop plans is excessive and a waste of time.

8. We enjoy working with our DNR agent, but would maybe prefer if he could have him visit the dairy more on a regular basis.

9. Wish everyone had to use a NMP. Why don't all the rules apply to everyone. We can't haul in December yet we seen lots doing it last year, and it was safe, so why can't we according to weather, not date? Why isn't all land soil tested, the CAFO all test theirs and when a problem arises we are to blame instead of the guys not following any plan. Would like to see some consistency.

10. We are very proud of having a land base to make it easy to stay in compliance. My concern is, - we chop for are around a lot of dairymen in the area who milk 100-500 cows, and are obviously not following a NMP, because they don't have the land base to support there animal units. It bothers me that they go unnoticed as they totally over apply, and we have to be so closely monitored? I certainly don't disagree with being in compliance with a very well written NMP!!!

11. Flexibility in restricted areas where depth to bedrock is 24 inches or less. feel that rather than 0 gallons if less than 24 inches , for example in areas where it may be 20 inches Or 16 inches it would make more sense to me to variable rate at lesser amount

over that area rather than turning around and having it puddle at that point on the edge of the restricted area. Feel it would be much more environmentally friendly to cross the area at a reduced rate.

12. We need a quicker approval, when additional land base becomes available. Some times we need an answer within a few days, would be very helpful.

13. Keep the process simple. Continue to streamline the process to achieve simplicity on everyone's part. Minimize the amount of paper and/or reports needed to comply.

14. Eliminate all of the double information. Example: much of the information on the NMP Is repeated on the annual report and the quarterly report. Such as soil samples and manure samples. this takes the consultant more time which cost me more money. Give us the latitude to add fields as needed knowing that we will soil sample inspect and hazard map the new fields. Don't mind if people have a legitimate complaint. But there are many times we are doing things right and we end up spending a lot of time and money defending are selfs. This is not right. Who do we send the bill for the time defening what we do? The DNR should filter the complains, by throwing out the nusant ones. Thank you.

15. Our NMP is a living document that has to be flexible within the rules. With technology, weather, and economics changing everyday, changes need to be made. The DNR has been nice to work with.

16. The amount of paper work and time spent to make changes is extreme. I think you should have different degree of involvement according to past records from farms. example: If you did my review and everything looked good there should be a different degree of reporting to DNR versus someone who have not be doing things correctly.

17. DNR people worked with have been very reasonable and pleasant to work with. Thanks!

18. I feel that if you have a certified planner complete the plan then the DNR would not have to go over all plans. I would suggest a lottery to determine which plans to go over. If there are many concerns by the local DNR person for a particular producer then the DNR should check the plan. This would possibly cut some of the paper work of the DNR thus reducing the overall cost to the state and local governments.

19. I have fears that with different cropping systems that one shoe may not fit all.

20. I think a general permit for hogs is not out of the question. Also all the annual report should not need to be sent in we should just have to have them on the farm and just send in the check list. I also think not only do you need to tell us what you want

but where is the best place to round the things up at. We should be able to send in 1 electronic file and that's all. Keep it simple, less confusion and looks more transparent.

21. Nutrient management Planning had good intentions. It is now evolved into a bureaucratic waste of time and money. As for environmental protection, it is overkill and over reaching that keeps people busy. Real environmental protection could be done with less red tape.

22. DNR staff should respond to request for changes/modifications within 24 hours, even if the response is "I have received your request and I will have an answer/approval for you within _____ days".

23. WAPAC provided a position paper to DNR and DATCP in January of 2012. As the creators of the NMP's their recommendations provide the best suggestions for streamlining and improving efficiencies of NMP's better than a permittee ever could. Please take their recommendations into consideration.

24. We now are required to submit the plan and then a mid year one and I would think if it was only required annually that it would be adequate.

25. TO MUCH REPORTING ON PAPER THAT DOES NO REAL PROFITABLE USE. MOST OF THE REPORTS THAT DNR WANTS US TO REPORT ON ARE JUST COMMON SENSE TO THE AVERAGE FARM OWNER-OPERATER. THE OPERATER THAT DOES NOT DO THESE COMMON SENSE THINGS DOES NOT STAY IN BUISNESS VERY LONG WITH TODAYS PRICES. THE STATE INSPECTER WOULD BE ABLE TO SEE IF THERE WAS ANY PROBELMS. WHEN THEY STOP AT THE FARM DURING THERE REGULAR VISITS. THANKS FOR THE CHANCE FOR THE OPERATER TO HAVE SOME INPUT.

26. We as dairy farmers take excellent care of our land and continue to strive to be better with what we do. Sometimes rules and regulations are formulated for a one fits all type of scenario regardless of soil type, slopes. I also feel that there are duplicated services from my crop consultant, NRCS and also the DNR.

27. We (people who own the land) are not stupid. Work alongside us to make this process work smoother. It makes no sense to me that I am limited on the amount of manure I can apply, then turn around and buy FERT to insure my crop grows properly.

28. It would be nice for CAFO permit holders to be able to handle solid waste differently than liquid. For example, stockpiling bedding pack from calves, and waste feed throughout the winter months is difficult, defeats the purpose of odor control for

those who have a digester and spent a lot of money to help with that problem, and it seems it is a low risk product.

29. I am not sure the DNR needs to review plans that have been put together by certified planners as this adds governmental cost and time. If they pass a "scratch and sniff" test that should be fine. More focus on keeping the spirit of the law as well rather than the letter of the law, Manure application is nowhere near an exact science, but we are judged as if it is, if we are allowed to apply 120 lbs of N and we end up with 125 I do not see this as an over application, if we were to apply 135 that may be a different story. Maybe we do not need slush room on every field, but if the 16 ounce sample that was taken from 1.5 million gallons happens to be high I am in trouble.