

Nutrient Management Plan Review Process – Lean Six Sigma Project

Comments from the Wisconsin Association of Professional Agricultural Consultants (WAPAC)

July 27, 2012

WAPAC appreciated the opportunity to participate in this project and would like to commend the Department for initiating a continuing process for evaluating the effectiveness of its programs and efforts to find efficiencies in government.

The Nutrient Management Planning (NMP) Lean Six Sigma Project report is a compilation of all the ideas brought forward as a result of the Lean Six Sigma process to improve and streamline the CAFO nutrient management plan review process as well as improve the quality and implementation of nutrient management plans for CAFOs in the state. However, it was not a consensus process, and because of the diversity of experiences or roles that project members have with the nutrient management planning process, there may not be total agreement on all goals outlined in the report. Diversity of opinion is a good thing, and offering a process where stakeholders can openly discuss differences of opinion to work toward a common goal of improving the nutrient management planning process for CAFOs in the state can only bring about positive results.

Following is a summary of some of the main comments from members of WAPAC's ad hoc committee on Nutrient Management Planning regarding the NMP Lean Six Sigma Project report.

Several goals refer to either encouraging or requiring all CAFO farms to use standardized tools and templates (narrative template, monitoring forms, and reporting forms). We support these goals; however the department should encourage but not require the use of these templates. Standardized templates and forms can help planners develop plans that meet the complex requirements of the NR 243 standard and are great for streamlining the review process, however too much standardization can take away some of the flexibility and creativity needed by planners to develop individualized and implementable plans that meet the needs of specific operations. Also, there needs to be flexibility to use a system that works for the farmer or custom hauler.

Goals to provide improved guidance documents (procedures for determining shallow bedrock or water table soils) will not only help planners meet specific NR 243 requirements, but also improve consistency in development and implementation of plans throughout the state. The current requirement to submit a 5 year manure application plan is a very time consuming procedure to ensure there is an adequate land base to properly manage the manure nutrients produced by an operation. The goal to investigate guidance for alternative methods (i.e. Nutrient mass balance approach) of demonstrating an adequate land base will decrease plan preparation time, freeing up more time for implementation of the plan. We would welcome the opportunity to assist in developing these guidance documents.

There are several goals related to planned improvements to the SNAP+ Nutrient Management Planning software developed by the University of Wisconsin with support from several state agencies. The current version was designed specifically to assist in developing an NMP to meet requirements of the NRCS 590 standard. Goals to add more functionality to the software specific to the additional requirements of DNR's NR 243 standard would not only help planners in development of compliant CAFO NMPs, but would also assist in meeting reporting requirements. Amending SNAP+ to reflect crop nutrient recommendations for predominant soils vs. dominant critical soils is also needed. There are other goals to develop hand-held applications (mobile apps) for manure application record keeping and a Geographic Information System (GIS) application that is embedded in or interfaced with SNAP+. We do not question the usefulness of the mobile apps or having the functionality of a GIS system within SNAP+. However, these may be a tremendous undertaking to develop and maintain. Does the cost exceed the benefit, or are there existing software alternatives? There are several GIS software packages currently available to farmers and planners. Instead of developing a GIS capability within SNAP+, should efforts be directed to making the data within SNAP+ accessible to GIS software currently available to farmers and planners?

Adaptive management in relation to yields and crop nutrient management is a concept that we support. Agronomists have recognized a need for adjustments to nutrient recommendations based on local conditions. We support goals to allow for adaptive management based on local data and research results.

We support several goals that relate to improved communications and exchange of information during the review process. These include DNR on-line sharing (SharePoint project) of application materials, centralized monitoring of the application and review process, and adoption of internal standard operating procedures. Accomplishing these goals should help to streamline the permitting process, improve efficiencies, improve communications between all the stakeholders, and promote consistency between regions throughout the state.

This is a summary of the main comments from our ad hoc NMP committee. We would be happy to discuss the report with the Department in more detail, and discuss opportunities where our organization can assist with achieving goals outlined in the report. We understand that the "NMP Review Process – Lean Six Sigma Project report" is meant to be a working document and is just the start of a continuing process. WAPAC appreciated the opportunity to participate and welcomes the opportunity to continue its participation in the process.

Respectfully,

WAPAC Nutrient Management Planning ad hoc committee

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