

Substantial Revisions

2023 Results and Best Practices Going Forward

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CAFO Workshops 2024

2023 RECAP

Staff Changes:

January 2023 – Jordan Salley left the Department

March 2023 – Tony Salituro transitioned to a review engineer role

September 2023 – Sonya Ponzi started as a CAFO Intake Specialist

December 2023 – Hannah Davidson started as a CAFO Ag Runoff & Nutrient Management Specialist

Substantial Revision Timelines

- Review and approval may take up to six months
 - NMP Substantial Revisions are considered permit modifications
 - DNR has 100 business days to public notice the revision after receipt
 - DNR has 50 business days to issue a final determination after a public hearing
 - The most efficient review time is 21 days, with a required 14-day public notice period
 - This timeline is achievable only if no public input is received
 - When staffing is down, this can increase timelines

2023 RECAP

By the Numbers

311 – Substantial Revision Applications Received

183 – Applications Requiring a Request for More Information

8 – Applications Receiving Substantial Comments/Requests for a Public Hearing

7.7 – Average Fields in a Substantial Revision Application

14 – Substantial Revision Applications Seeking to Add 1000+ Acres in 2023

70,257 – Acres Approved through Substantial Revisions in 2023

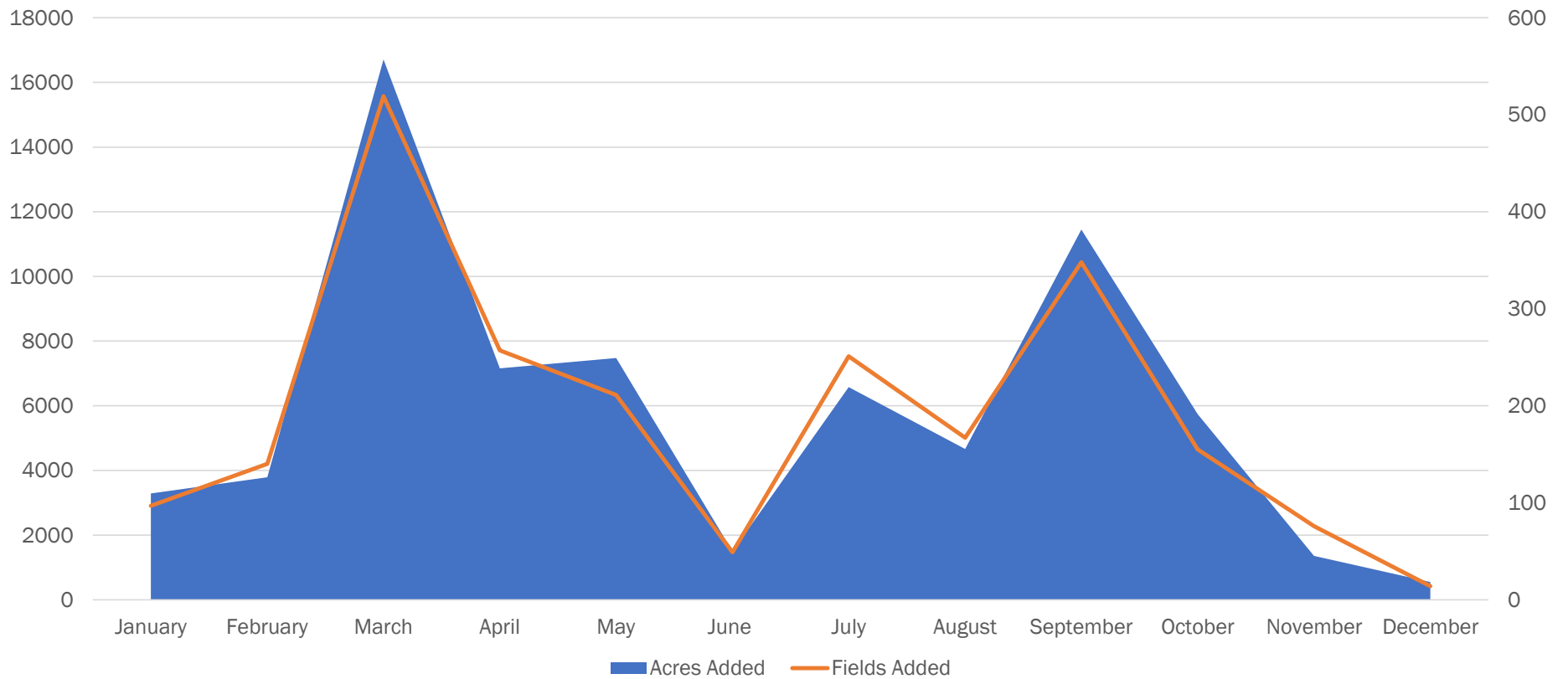
REQUESTED INFORMATION

Major Trends in Requests for More Information

- Missing/Inaccurate Layers on Restriction Maps
- W-soils not shown on Compliance Check
- One-year crop rotation or no plan for crops/manure and fertilizer applications
- Missing Manure Analysis
 - Requirement can be met with manure analysis lab sheets, running averages, or manure tracking SNAP+ report

| | Jan | Feb | March | April | May | June | July | Aug | Sept | Oct | Nov | Dec |
|----------------------------------|-----|-----|-------|-------|-----|------|------|-----|------|------|-----|------|
| Total Submitted | 17 | 21 | 68 | 42 | 23 | 6 | 29 | 26 | 40 | 23 | 11 | 5 |
| RFMIs Needed | 12 | 5 | 51 | 31 | 14 | 2 | 17 | 17 | 18 | 7 | 7 | 2 |
| Average Delay in Approval (days) | 6 | 10 | 7 | 16.4 | 8 | 20.5 | 5.3 | 8.9 | 5.7 | 15.7 | 12 | 12.5 |

HIGH TRAFFIC TIMES OF YEAR



RECOMMENDATIONS

1. Submit at least a month in advance

The Department aims to review substantial revisions as quickly as possible, but during busy periods or as a result of requests for information/public comments there can be delays in approval.

2. Soil test fields in advance.

Manure applications are prohibited on new field(s) until they can be properly soil sampled. The Department will be reassessing the use of a “default” value of P=101 going forward.

3. Ensure that the plan for the new field(s) is complete.

We must ensure that the anticipated manure AND commercial fertilizer applications do not result in an overapplication of nutrients, the plan accounts for crop rotation, tillage plans, and the planned nutrient applications.

4. Upload and Download before submitting.

Confirm that any updated layers have been added to the GIS or other mapping program used to generate spreading restriction maps and remember to upload and download the shapefile of fields.

5. Provide all SNAP+ Reports for new fields only.

When reports provided show all fields in the NMP, we must review all of the provided information. To speed up the review, submit reports only for the field(s) to be added to the NMP. Ensure all necessary reports are attached.

QUESTIONS?

See Guidance for Substantial Revisions to a CAFO NMP:

<https://dnr.wisconsin.gov/topic/CAFO/NutrientManagementPlan.html>

Please feel free to contact the Department with any questions:

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