

Presentation of Concept of Nutrient Management Verification

We are in a tough situation,

- being pushed to get verification
- working without enough staff
- needing to maintain relationships with our partners, etc.
- If we do not get verification of implementation of NMPs we are in serious danger of loosing federal funding for our program

We must

- We need to make sure that we are all on the same page when it comes to implementing the confirmation of implementation of NM.

We Must

- Conduct a survey. If the DCR Staff do not conduct the survey on 10% of the NMP's in the next two years, funding will be in drastic jeopardy.

What does the EPA Expect?

- All EPA expects is for a farmer to do what he can to assist in water quality improvements.
- If the state cannot demonstrate implementation, the farmer can expect a much higher level of regulation.

What do we gain?

- Nutrient Management has the potential now to offer very large reductions in the nutrient load, going from 5.0% edge of field and 2.4% edge of stream reduction two years ago to a 15% edge of stream reduction.

What are we calling this?

- Refer to what we are doing as a “confirmation of implementation of Nutrient Management” or “survey of implementation of Nutrient Management”.
- We need to stay away from the term “audit” or anything like that.

Our approach

- What what we are doing is conducting a survey to determine the degree of implementation across the state.
- This is not intended to be a threat to farmers or their procedures.
- We are not evaluating the farmers, we are just looking to see how much of our work and the work of private planners is being used/implemented on the farm.

- Note: we are not the “Manure Police” and will not be calling DEQ, the EPA or anyone else.

What is expected of the Nutrient Management Specialists?

Conduct the survey and report findings

What do we hope to find?

- If we find that farmers are trying to implement NM that is good!

What part of the farm needs to be covered in this survey

- All acres with NM cost share
- All acres under permit

What are the consequences to the farmer?

None for the next two years, unless they receive NRCS or FSA funds. Those two agencies may score the farmer lower on funding request if they are not following plans.

What are the consequences to the farmer?

- However, in 2017 unless DCR can show that farmer participation and implementation is improving, they can fully expect an increase in the number of visits to both permitted and unpermitted facilities across the state.

How do we maintain a good working relationship with the farmer?

- Keep the farmer educated as to how they can keep the EPA satisfied by documentation that plans are being followed. We don't want to get into a situation of more direct EPA oversight.

- There will be a form that needs to be filled out and maintained in the file with the farmers plan so that the planner will know how to look for improvements.
- There will be a series of questions to be answered for the survey. The questions are to be answered by the specialists after visiting with the producer.

- Remember, we are looking for both ways to document compliance and ways to improve. We want to help farmers develop better records of their activities and of when plans are modified or revised.

Questions:

- Does the NM plan cover sheet have the plan writer's name and certification number?
 - This is a simple question to answer. All of the DCR written plans should have this information, so this should not be an issue.

Questions

- Does the plan indicate a begin date and end date that is covered by the plan?
 - This is also a simple question to answer. All of the DCR written plans should have this information.

Questions

- Are livestock numbers and manure production numbers and application consistent with what is in the plan?
 - DCR allows a 10% deviation from what is written in the plan without the NMP needing to be modified. DEQ regulations read the same way. If the farm is within 10% of the animal numbers the plan is written for the plan is in compliance.

Clarification of points

- This includes rate recommendations for N,P,K, and lime, and following timing recommendations.
- No application of manure to bare ground or within 30 days of planting.
- Following restrictions related to application on frozen ground, observing areas associated with sensitive sites, and observe setbacks on wells, springs etc.

Further clarification:

- What will be judged to be “sufficient records”?
 - The records should be adequate to demonstrate what was applied to each field.
- How will we document that there was no application of manure within 30 days of planting?
 - The records should show when applications occurred.

Further clarification:

- How will we document that there was no application on frozen ground?
 - The records should show when applications occurred.
- How will we document avoiding sensitive sites and setbacks?
 - This is something that should be observable when walking the site.

Questions

- Do the crop rotations and tillage systems match up with what is in the plan?
 - If a farmer changes crop rotations or animal numbers, do not match the plan then should be modified.
 - If we find that the crop rotation or animal numbers are not as written in the plan we will need to note this information so that we can better estimate how well NM plans are followed state wide.

Questions

- Will planned crop rotations and tillage systems achieve “T” with no active gullies?
 - OK, we are not really going to check that the system is achieving “T”. We should note problems such as severe erosion, gullies, etc.

Questions

- Does the farmer have sufficient records to demonstrate that he is putting forth his best effort to follow the plan?
 - A farmer should be able to say how many gallons of manure were applied on which field and on what date. Lime recommendations are a required part of a plan, so the farmer should be able to say what was applied to a field.

Questions

- Is the manure sample test up to date?
 - samples have to be less than 3 years old.

Questions

- If soils test results are above 55ppm VT are all manure application rates based upon the Threshold or P-Index using RUSLE2?

Discussion on RUSLE2

- Who will we get to run RUSLE2? Who does RUSLE Calculation for P-Index now?
 - This is typically a NRCS task. RUSLE calculations are not answered by the Specialists. Answered by the Conservationist or MP planner if Applicable

- What if the Nutrient Management Specialists believes that the plan is not being fully implemented?
 - Then answer No in your survey

You should know

- This performance of surveys may become a part of each planner's EWP. This is critical so that we can keep receiving funding. Conducting a survey, and educating a farmer will become a part of the job.

- Questions, please ask we all need to be on the same page for this one!