

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #7.

Timestamp 11/19/2012 2:51

**Name** Deb Schiel-Larson

**City** Indianola

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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What a disappointment.

I have been working as a professional on water quality and water quantity challenges in Iowa for the past 10 years, on new development and redevelopment sites.

Specifically, I'd like to highlight this statement: ". . . the strategy outlines voluntary efforts . . . "

Voluntary?

Why?

The situation this "Strategy" attempts and fails to address is way, way past "voluntary efforts". We've spent years encouraging voluntary efforts with agricultural interests in Iowa. We know our topsoil is melting away, we know our drinking water is polluted. If "voluntary" is working, why spend so much time on these documents?

We must have requirements, accountability and measurable results.

There are citizens in Iowa who are already doing their share. Why not agriculture too?

For example, over 40 cities and several universities in Iowa have Municipal Separate Storm Sewer System Permits (Phase I and Phase II MS4 permits) that require compliance to improve water quality and water quantity in Iowa. We are seeing results. Developers who disturb an acre or more are required to obtain a permit from the Iowa DNR (General Permit no. 2) for erosion and sediment control on their sites. We are seeing results here too. Not voluntary; required.

What is amazing is that we have integrated the requirements into what we're already doing. Yes, it was difficult at first. Yes, there was controversy. But there is acknowledgement now that it's the right thing to do for Iowa -- for our soil and water. There is pride in what we've accomplished together. We have a lot more work to do, but we can see the progress.

Water and soil are precious resources in Iowa! Who knows that better than the agricultural community? Especially during a serious drought?

Public education on water quality and water quantity improvement efforts is well founded in Iowa and gaining ground. People are no longer in the dark about what causes pollutants in Iowa waters, who is addressing it and who is not.

Progress on the part of MS4 cities and developers has come at a cost to our citizens. They know it.

By contrast, agricultural interests are already perceived as getting unfair preferences. The current controversy regarding the Farm Bill is well known.

Is this proposed "Iowa Nutrient Reduction Strategy" an unfair benefit to agriculture? It sure looks that way.

Please -- show some leadership and step up. No one is asking agricultural interests in Iowa to do any more than their share. But require

# Iowa Nutrient Reduction Strategy

Online comment submissions

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**Timestamp** 11/19/2012 2:51

**Name** Deb Schiel-Larson

**City** Indianola

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

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something!

What a disappointment and an embarrassment. "Voluntary?" You can do better than this.

Sincerely,

Deb Schiel-Larson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#8**.

**Timestamp** 11/19/2012 7:46

**Name** Michael Blackburn

**City** West Des Moines

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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After reading the summary I will have to say I am disappointed. A voluntary approach to farm nonpoint source pollution is woefully inadequate to address Iowa's polluted waterways. We have already tried voluntary approaches and funded these approaches substantially. Despite these voluntary programs water quality has gotten worse in Iowa. We also know that the vast majority of nitrogen and coliform bacteria come from farm runoff. With this knowledge we should target pollution at its source with practical MANDATORY regulations that reduce harmful runoff.

The Iowa farms do not own the waterways they pollute. These waterways are natural resources for Iowans and for wildlife. The focus thus should be on enforcing the clean water act because clean water is a civic good. Civic goods are more valuable than the special interests of a few. Imagine if the clean air or clean water act were only voluntarily followed? Do we want air pollution and water pollution problems like they have in India or China? Well they have a voluntary approach to clean water and air as well. Look at their environmental problems.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#9**.

**Timestamp** 11/19/2012 8:26

**Name** Don Steichen

**City** Cedar Rapids

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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The biggest problem I see in my area is the over population of geese and the storm water run off policies of past years. Another concern is the tiling out of as much farmland as farmers can and funneling the water to our streams and rivers. Making the flow faster and faster. With our grade for water quality being a C- at best something new has to change. I think public education and awareness in schools(Teach them early). Publicity awards to Cities that demonstrate they care might help too.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**10**.

**Timestamp** 11/20/2012 7:59

**Name** Gerald Neff

**City** Pleasant Valley

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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If all actions are voluntary don't expect 100 percent participation. Or maybe not even 30 percent participation.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**11**.

**Timestamp** 11/20/2012 2:13

**Name** Jeff Kautz

**City**

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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I do agree something does need to implemented and enforced. It has been well documented that current farming practices cause most of the nutrient problems in the Gulf of Mexico.

Wastewater plants are already heavily regulated by IDNR and EPA rules and standards for effluent discharges. It is unrealistic to expect water quality to improve by placing more regulations on wastewater plants, while expecting the farming community to voluntarily comply with any nutrient reduction strategy.

The EPA must get actively involved in enforcement to help lessen the impact of non-point pollution on the nations waterways.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #12.

Timestamp 11/20/2012 3:55

**Name** Will Emley

**City** Slater

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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There must be a mechanism for requiring more adherence to Water Quality Act requirements. Farmers must create buffer strips, create wetlands to store nutrients on site, reduce the per acre amount of nitrogen applied to fields and better incorporate hog manure to fields.

Farmers do not understand that water quality is a driving force for economic development. Recreation is a big business enterprise. Algae laden waters are not conducive to good recreational opportunities.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#13**.

**Timestamp** 11/20/2012 3:56

**Name** Jeremy

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Based on what I read in the nonpoint source nutrient reduction science assessment, land uses changes to a perennial buffer strip by far is the best strategy for nutrient reduction. This does take land out of agricultural production, but with programs such as CRP the landowner can be compensated.

If we really want to make a difference in the amount of nitrogen and phosphorus that Iowa dumps into the Gulf of Mexico we need to put native perennial buffer strips on all streams in Iowa. This would not only reduce nutrients but also increase the number of upland game birds and a wide variety of other species. The increase in game animals would bring the potential for a large economic gain for Iowa, through hunting and the associated money that hunters contribute to the economy



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**14**.

**Timestamp** 11/20/2012 5:28

**Name** Leo Lease

**City** Grinnell

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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As a farm owner (Sac County) concerned with conservation, agricultural sustainability and water quality I would, for starters, like to suggest small changes to policy be required of county supervisors who govern drainage districts. If they were required to set goals in acknowledgement of responsibility for water quality as a priority in any watershed management decision that is made, then the best management practices would at least be considered for discussion. The prime concerns have traditionally been "drainage" with pushing the problem downstream as the solution. A more responsible attitude could start by changing "drainage management" into "water quality management." We shouldn't need another dust bowl to see the handwriting on the wall.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**15**.

**Timestamp** 11/21/2012 1:26

**Name** Charles WINTERWOOD

**City** Dubuque

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Since agriculture causes 70% of nutrient pollution in Iowa, mandatory rather than voluntary nutrient reductions need to occur. My federal tax dollars subsidize farmer's crop insurance. As long as they are receiving federally subsidized crop insurance, farmers should be required to implement conservation practices that reduce nutrient runoff. It is not fair for people on the Gulf of Mexico to be impacted by insufficient practices to control nutrient runoff by Iowa farmers.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**16**.

**Timestamp** 11/21/2012 1:39

**Name** Katrina Moyna

**City** Amana

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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So long as the burden for cleaning the water is not placed on the water treatment plants, but rather on the contributors to the hypoxia zone in the first place makes the most sense. There should also be alternative options to chemical fertilizers (organic, no-till) made available to farmers and they could perhaps be paid to implement these practices. Otherwise, there's no point in polluting the water just to have the water treatment plants clean it up again.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#17**.

**Timestamp** 11/21/2012 5:38

**Name** Hillary Maurer

**City** West Branch

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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The time is long past for using a voluntary approach to reducing non-point source pollution. The condition of our waterways and the Gulf of Mexico is deplorable yet point-source pollution has been regulated for 40 years. It is obvious that the problem is non-point source pollution and no action will be taken by agricultural concerns until they regulated.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#18**.

**Timestamp** 11/23/2012 8:51

**Name** Dennis Strayer

**City** Hudson

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I have not been able to download the documents. The following message appears - "File damaged and cannot be repaired".

I work in sustainable systems for agriculture and would like to read the documents.

Dennis

319-988-4210

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#19**.

**Timestamp** 11/23/2012 6:55

**Name** Matt Lorenzen  
**City** Center Junction  
**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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I was just wondering if there is any proposed regulations for municipal areas. Any home owner can buy fertilizer at any store and apply to their lawns. A little is good more is better. It seems many of the lakes that are having issues are by big towns. Just thought I'd voice that side. All the interviews I've heard have not mentioned anything about that. Farmers and the industry are generally only going to apply what is needed. Simple economics.

Matt Lorenzen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#20**.

**Timestamp** 11/25/2012 2:35

**Name** Susan D Carpenter

**City** Coon Rapids

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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High up in the water shed, slow water down and allow it to soak into the earth before it gains power to erode. Paul Krafel in Seeing Nature advocates a one person - one trowel approach to solving the problem. Break a rivulet into two parts, again and again.

"What he has discovered is that people as groups (e.g. the cliff-dwellers of the SW) or as individuals (himself) are actors in the experiment. That individual action on a small scale over a period of time can affect the environment positively and have that same impact on oneself."

I would like the report to include empowering each Iowan to be a part of the solution at their own

place, with their own hand.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#21**.

**Timestamp** 11/26/2012 10:17

**Name** Brenda Barton

**City** Ames

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I am just a nurse, an in town gardener, and a 5th generation lowan with many farmers scattered throughout my family history. I have great concern about our farming practices and the impact on our topsoil, water, air. Especially when we are supposed to be agricultural leaders in this state. I believe our current model of pesticide, herbicide use is unsustainable. I believe the ridiculous amount of basically unregulated CAFO's are ruining our water and sending it downstream to ruin the ocean. We have a model being run by Big Agriculture that looks at profits as the bottom line instead of building an agricultural system that truly is sustainable. I am angry that our greatest resources air, water, soil, are being mismanaged.

That said I do have some ideas. I believe in organic practices, in growing more diversity, local markets. I have been reading Paul Stamets work on mycoremediation and mycofiltration as ways to clean up and restore our waterways and soil. We have some great scientists in this state who are not owned by outside interests who are making profit at lowans expense (and now the rest of the world as we contribute to the oceans deadzones)

So Francis Thicketts book A New Vision for Iowa Agriculture, and Paul Stamets book Mycelium Running are both worthwhile resources and viewpoints to consider with ideas to implement. If there is any way I can be of service in helping our state restore itself please let me know. I have great hopes for your work and consider it our work.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#22**.

**Timestamp** 11/28/2012 11:42

**Name** Lynn Gallagher

**City** Solon

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I appreciate the efforts to study nutrient reduction and to design policies and actions to limit run off and protect our environment.

I strongly disagree with the idea that voluntary compliance will work.

We need strong regulations and enforcement.

Not all farmers are stewards of the land. I have seen, with my own eyes, farmers removing extensive numbers of trees and grass along creeks, leaving no buffer. And then they plow right up to the edge of the creek.

I understand why farmers don't want regulation. Unfortunately, it is necessary.

All you have to do is see what removing Glass-Steagall did for Wall Street.

Please do what is necessary to truly protect the environment and pass strong regulations. Then we need to fund and staff the DNR to enforce them.

If Iowa can't do what is needed, then I welcome the EPA to come in and do so.

Sincerely,

Lynn Gallagher

**Name** John Norwood  
**City** West Des Moines  
**State** Iowa

**Providing comment on the following sections:**

<input checked="" type="checkbox"/> Executive Summary	<input type="checkbox"/> Nonpoint Source
<input checked="" type="checkbox"/> Policy	<input type="checkbox"/> Point Source

Dear Interested Party:

I would like to take this opportunity to thank Secretary Northy, DNR Commissioner Gipp, and ISU for its leadership in this important area. I watched the video and read the Executive Summary with great interest. Given the fact that maintaining and enhancing Iowa's Agricultural productivity is key to continuing the state's economic prosperity, I'd like to submit the following comments:

1) The Rates and Quantity of Fertilizer to be applied to Iowa Farmlands, will continue to increase as yields increase. In the past twenty years, total yields of corn have doubled requiring a steady increase in farm inputs, including NPK. It will be increasingly difficult to reverse the impacts of nutrient loading, given these strong headwinds unless we chart a new course. We need to find ways to reduce the "leakage" of N and P off the fields and into our rivers and streams and one of the biggest sources of leakage is our tiling systems, many originally built in the 1930s through public works money. We need to modify these systems to hold and detain water, in addition to the original goal of draining the field. This will require Federal Assistance in the form of investment.

2) There's an important connection between N and methane and ammonia, two critical green house warming gases that needs more attention in our strategy. The connection is our livestock, and in particular our swine livestock (more than 36 animals per year) which is used to supply about 25% of our total N needs in this state, via the application of manure to the fields. We produce something like 30% of this nation's pork, and have a rudimentary and antiquated management system for processing the manure before it is applied on our fields -- we have 3 million people in this state but given our livestock we really function from a wastewater perspective more like a state with 30 million residents! In the process of collecting the manure, on a total statewide basis, large amounts of methane and ammonia are produced and released to the atmosphere. If we are serious about controlling green house warming gases, our nutrient strategy should be tied to controlling methane production because there is existing technology to control methane release and its known as anaerobic digestion. Many of our largest municipal treatment plant systems utilize this technology. With an appropriate market framework (not each farmer trying to be their own wastewater treatment plant operator!) we can capture this methane (and get paid to do it), and in the process convert the N in our manure to a "stickier" form that is less likely to leach into our streams and rivers. We can also increase the amount of micronutrient and fiber rich digestate coming out of the backend of these facilities and land apply those soil amendments to build soil structure and water holding capacity. This will be ever more important as agricultural productivity on a per acre basis rises. Another benefit of additional processing of our manure, is that we can increase the holding capacity of livestock on our lands so that more N can come from a close looped system from animal to crop to animal vs. natural gas to crop to animal. Finally, some would argue the most important benefit of an advanced manure management system is that we can finally address odor and public health issues because systems like anaerobic digestion address these concerns.

3) Return on investment. The concept of return on investment is introduced in this strategy but it needs to be more carefully thought out. With respect to Point Source Pollution, there is a figure of \$1.5 billion investment figure associated with a 4% reduction in nitrogen and a 16% reduction in P. I'd consider this an important "opportunity cost" hurdle. Is this the best and cheapest way to reduce Nitrogen, or is there a better way particularly when 90% of the problem is coming from non-point sources with more coming on the horizon because of increasing in farm yields? I would argue that funds from urban wastewater ratepayers, for example, would be more wisely invested if we created a market based system that entailed, for example, ratepayers paying an equivalent amount of funds in the form of electrical rate subsidies that allowed the development of a voluntary-based on farm, series of wastewater treatment systems for our swine confinements, based on participating electric utilities and/or (state and federal gov't) subsidizing methane collection at the manure pit so that these collection systems pencil out. Because the total amount of energy collected either in the form of electricity produced from methane, or gas captured and piped into the natural gas system for our residents, businesses, or ethanol plants is relatively small (few percent at most), the rates shouldn't be impacted to a great degree. The same argument can be made whether electric utility rate payers would be better off paying to control carbon dioxide in new coal plants or methane from, say, Iowa farms, particularly when methane is 21x more potent than CO2 on a per ton basis.

4) Finally, I'd like to offer a big picture thought. The Title of the strategy presented is "A Science and Technology-Based Framework", suggesting that science and technology will drive the strategy. I'd suggest a twist on the approach. We need a MARKET DRIVEN strategy that will utilize what science is telling us about where the nutrients are coming from and how to keep them in place, while evaluating how technology can help us reach our goals and recognizing that it is investment which will drive progress, keeping in mind who pays, how much, and how we realize the best return on investment. What is equitable and feasible, given the stakeholders involved?

To realize the best set of outcomes, I believe we need to move away from the notion that we need to choose between "voluntary" or "mandatory" practices. Instead, let's move toward a market based approach that, at least for starters, entails voluntary participation, but is driven by significant infrastructure investments, as directed by where the science is telling us we can get the biggest bang for our buck. That investment analysis should take into account not only nutrient loading returns on investment, but the linked negative externalities of methane and ammonia releases, which impact human and animal health.

Given the potential for Global Warming to be seen as a national security threat with real economic impacts to the cities on the coasts, in particular, as superstorm Sandy recently made apparent with damages in excess of \$50 billion, a good portion to be borne by U.S. Taxpayers,

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **2** of comment **#23**.

**Timestamp** 11/28/2012 12:43

**Name** John Norwood  
**City** West Des Moines  
**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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I would like to see the Federal Government look to make substantial new investments in our agriculture/wastewater/emissions control infrastructure as was seen under the Clean Water Act in the 1970s and previous to that during the 1930s when Roosevelt's WPA made major public investments in our agricultural infrastructure. This is an investment that can be justified along economic productivity, environmental, and national security parameters.

Let's take the time to develop an integrated, market driven strategy that will enhance Iowa's crop and livestock productivity, control N and P nutrient losses to the soil, our rivers and air, and begin to address the odor issues which have caused friction in and among many of our communities.

Thank you for the opportunity to comment.

Sincerely,

John Norwood  
Managing Director  
TBL Ventures, LLC  
West Des Moines, IA

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #24.

Timestamp 11/29/2012 8:29

**Name** Eric

**City** Dubuque

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I'm not completely sure of how this report will be any different than what has been discussed or it already known as it relates to N and P loading. Agriculture (corn and beans) has become a market driven industry like any other business in our nation. The amount of dollars that Iowa receives via an agriculture economy - compared to how much is dedicated to conservation is an embarrassment. Nothing will change unless there is 1) regulatory impacts on agricultural land to control N and P or 2) Funding is drastically increased to enable Districts and the NRCS to incentive farmers who do the right thing, and create additional CRP - Cost-share Programs and, BMPs throughout the state.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**25**.

**Timestamp** 11/29/2012 10:31

**Name** Patrick Bosold

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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The Iowa Nutrient Reduction Strategy presented here has some problems that need to be corrected. In addition, the methodology for public comment is seriously flawed.

The Strategy is being criticized for being lopsided in the manner in which it allocates resources and effort.

Municipal and urban sources of pollution, which are estimated to contribute 12% of the phosphorus and 9% of the nitrogen in Iowa's waters, are given strict prescriptions.

On the other hand, agriculture is estimated to contribute 70% of phosphorus and nitrogen loading of Iowa's waters. In this current version of the Strategy, agriculture is supposed to be mitigated by voluntary efforts of farmers and absent of regulation. We've had ample opportunity to see how well this works so far - and the answer is, "it's not working."

The Des Moines Register recently reported that several segments of the Strategy were copied nearly verbatim from Iowa Farm Bureau Federation policy documents. I suppose that this should not be surprising, given the IFBF's track record and reputation for influencing state policy. But it is nonetheless unacceptable if we are in the process of developing a much-needed change in the state of Iowa's policy and planning on this issue.

Officials with the Iowa Department of Natural Resources have complained that they were not allowed input on the working draft of the document. How does the state of Iowa expect to come up with a workable, science-based plan on this issue without full and open Iowa DNR input?

Regarding the methodology for public comment for the Strategy: the comment period is way too short for a comprehensive plan such as this. The persons and entities who drafted this document spent more than two years behind closed doors preparing what we're looking at. But the public only has through January 4, 2013 to read the document and submit comments?

Recommendations:

(1) take this Strategy back to the drawing boards. Invite a wider range of participants for the new draft. Include representatives from the Iowa Environmental Council, Iowa Sierra Club, Iowa Nature Conservancy, Iowa Natural Heritage Foundation and other public advocacy and environmental advocacy groups. Also, there's plenty of good, peer reviewed published science available on how to best mitigate nitrogen and phosphorous impacts from agricultural activities - please make use of this well established science.

(2) After you've got a new, improved Iowa Nutrient Reduction Strategy completed, allow for at least 120 days of public comment on it before anything else happens.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**26**.

**Timestamp** 11/29/2012 11:14

**Name** J Lynch

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I appreciate that this study was done but disappointed that it seems the Farm Bureau so heavily influenced the report. I'm also very disappointed that the Iowa Department of Natural Resources apparently was not allowed input on the working draft of the document. It seems a very odd that this occurred.

I'm very happy to see municipal sources of pollution will be much more closely monitored but discouraged that agricultural sources of pollution will continue to be at the behest of the farmer and/or will be based on 'voluntary' efforts of the farmer. Is it not voluntary efforts that have been relied upon for the last century? What results have we seen from those efforts? My father is a farmer so I'm not purposely bashing them but many 'farmers' do not own the land they're farming. So, as opposed to published farmers' opinions that have been expressed in places such as the Des Moines Register's editorial pages that they have a close connection to the land, many farmers do not have a connection to the land and may have little interest in the long term condition of the land they may be leasing for one or two years.

Let's at least start with some basic regulation such as no crop land can bump up against a river bank. If it does buffer strips of a certain width need to be in place.

What's the definition of insanity? Doing things as you've always done while expecting change. Is that not what we're doing while waiting for voluntary efforts to improve our land and water quality?

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #27.

Timestamp 11/29/2012 3:09

**Name** Larry Thompson

**City** Davenport

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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There is an urban non-point pollution that would be easy to solve. The problem is created when fertilizer contractors spread fertilizer on sidewalks, driveways and streets without cleaning afterward. This fertilizer is left on impervious surfaces and is walked on and driven over until a rain washes it into storm sewers and then to creeks and rivers.

True, when taken individually this pollution is small. When cleaned up it amounts to 1/4 to 1 cup in volume and would be considered a point pollution. But when multiplied by the size of the watershed and the population the problem grows large and is considered to be non-point pollution.

The problem can be controlled by requiring fertilizer applicators to clean impervious surfaces after application. This would have to be done through licensing requirements and have stiff penalties for non-compliance. The cleaning problem could be handled by a lawn blower and the time invested would be minimal and the fertilizer would be blown back in the yard where it would be beneficial.

This would eliminate exposure to the chemicals for children, adults and pets and help reduce pollution in streams and rivers.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#28**.

**Timestamp** 11/29/2012 10:13

**Name** Amy Bouska

**City** Cresco

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Page 14, line 5, contains a mathematical error: The "4 percent" reduction in nutrients should be 41 (forty-one) percent.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #29.

Timestamp 11/30/2012 8:26

**Name** Pete Goodmann

**City** Frankfort

**State** Kentucky

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Thanks for providing this NRS and the website as examples for other states to use in developing their NRSs. We have great regard for the folks in Iowa working on this issue, especially Mr. Lemke, Mr. Northy and the folks at Moo U. (Sorry, I am a Hawkeye.)

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#30**.

**Timestamp** 12/2/2012 1:07 PM

**Name** Varel G.Bailey

**City** Anita

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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The policy options in discussion are the "carrot vs. the stick". The only option with the potential of success is a voluntary plan because it may give towns and farmers the time necessary to invent the technology to solve the problem. Several years ago at the Iowa Water Conference, Illinois gave a presentation on their research program to set a phosphorus standard. Inconclusive studies in Illinois resulted in their use of the river simulator at Oak Ridge, TN. The result there is that unless the phosphorous in the water entering the river is less than one-tenth of one percent (one thousandth) of the standard EPA is recommending it will have no impact on biological activity (hypoxia). North Carolina made a presentation of five years of research on a heavily agricultural watershed, documenting over 85% compliance of Best Management Practices (BMP) complete with before and after nitrate loading of the river. The result was that the technology of current BMP's have little cause and affect on river nitrates. At the close of the plenary session, I challenged the audience on mandatory river nitrate and phosphorus cleanups since research demonstrates we don't have the tools to do it. The deputy director of EPA was in the audience and he responded with "Just because the research shows it won't work doesn't mean we shouldn't do anything."

A regulatory program to end gulf hypoxia will result in disaster since it will mandate numbers that are currently un-attainable with current processes and programs.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**31**.

**Timestamp** 12/2/2012 7:00 PM

**Name** Dan Blinks  
**City** Center Point  
**State** Iowa

**Providing comment on the following sections:**

Executive Summary     Nonpoint Source  
 Policy                       Point Source

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Has anyone reviewed Wisconsin's research and results ?

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**32**.

**Timestamp** 12/2/2012 7:00 PM

**Name** Dan Blinks  
**City** Center Point  
**State** Iowa

**Providing comment on the following sections:**

<input type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Has anyone reviewed Wisconsin's research and results ?

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**33**.

**Timestamp** 12/2/2012 7:00 PM

**Name** Dan Blinks  
**City** Center Point  
**State** Iowa

**Providing comment on the following sections:**

Executive Summary       Nonpoint Source  
 Policy                       Point Source

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Has anyone reviewed Wisconsin's research and results ?

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #34.

Timestamp 12/3/2012 12:27

**Name** Sandy Amberg

**City** Dubuque

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I read with interest in the paper that we are working towards solving the problems of the wash off of nutrients (and chemicals) into our watersheds. This is very responsible behavior and something that definitely should be pursued for the health and well-being of the citizens and the planet.

One area you have failed to look into is the flushing of fluoride into the environment. As you know, fluoride is a chemical that is poisonous to life if too much is consumed. That is why children under one year of age are not supposed to drink Iowa water, most of which is fluoridated. That is why there are warning labels on tooth paste that parents should supervise the brushing of their children's teeth until they are six years of age, that children should not swallow toothpaste.

What many people fail to realize is that for all the Iowa Communities that fluoridate their water, 99.7% is flushed back into the water systems. Waste treatment plants can not clean the fluoride out of the water without a reverse osmosis system which would be too costly. Not only do community pay to buy fluosilicic acid, the toxic by-product of the fertilizer industry, but the community then pumps it back almost totally into our watersheds. I am not a rocket scientist, but this seems rather wasteful and harmful to me. Is your committee considering and study of this?

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**35**.

**Timestamp** 12/3/2012 3:13 PM

**Name** Research Department

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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This is a test message for your webform, please disregard. We apologize for any inconvenience.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**36**.

**Timestamp** 12/5/2012 2:16 PM

**Name** Paul Ellender

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

This is a test message for your webform. We apologize for any inconvenience. Paul Ellender



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#37**.

**Timestamp** 12/6/2012 12:03

**Name** Mike Bergman

**City** Mt Vernon

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Relying on voluntary compliance of landowners is of no value. If properly allocated, there are sufficient dollars available in the farm program to pay for mandatory conservation practices. Compliance with FSA/NRCS conservation plans has been historically lax. This needs to change. If a landowner is going to accept farm program payments, there absolutely must be compliance with the conservation plan.

As a general rule, laws should be promulgated that require any substance applied to or generated on a landowners property to remain on that property.

I am a farm owner myself and heartily request that you quit caving into the special interests and do right by the environment. The existing farm program contains all the necessary tools to make a real difference if aggressively implemented and enforced.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#38**.

**Timestamp** 12/6/2012 9:36 AM

**Name** Amy Bouska

**City** Cresco

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I was disappointed to find that the study uses the term "perennial crops" only in respect of switch grass and cover crops, and does not include a recommendation to support the work being done at The Land Institute ([www.landinstitute.org](http://www.landinstitute.org)) to develop truly perennial food crops, e.g., perennial corn. While this possibility is still several years in the future, when/if it comes to fruition, it would be a game-changer for Iowa's water and soil. As a farmowner who is looking into testing a bioreactor in one of my tile lines, I would welcome the day when crops don't need to be planted every year. I urge you in the strongest possible terms to include a recommendation to support this work.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #39.

Timestamp 12/6/2012 12:16

**Name** Floyd Walter

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Voluntary compliance has not worked to date. Must be incentives to comply. Floyd Walter

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#40**.

**Timestamp** 12/6/2012 12:31

**Name** Steve Peterson

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I recently heard you speak at the Fort Dodge Ag Show and would like to thank you for your participation. Regarding the questions regarding voluntary conservation practices I agree we need to do more as an industry in order to continue growth for the future. Currently on my family farm we use a combination of buffers, grassed waterways and residue management programs. In the future I am looking at drainage control devices and possible cover crops. Again thank your time and your work for our future in agriculture. Steve Peterson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#41**.

**Timestamp** 12/6/2012 12:47

**Name** Joseph Bahe

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

please accept that states are willing to implement their own measures to protect the enviroment. i no till and use iowa states nutrient guidelines and they both have made me more money, and saved the enviroment at the same time. Joseph Bahe

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#42**.

**Timestamp** 12/6/2012 2:56 PM

**Name** Gary Rayhons

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am writing in support for a science-based state nutrient strategy. Just as important, that strategy should recognize the importance of conservation practices, especially the one's that are practiced voluntarily. In my farming operation I plan on passing down my land to my children and the conservation practices i have in place will help ensure the land will be in good or even better conditions when that day comes. Water and air quality are important to me, so when it comes to a nutrient strategy, it's important that a strategy be based on science, and conservation. Gary Rayhons

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#43**.

**Timestamp** 12/6/2012 4:20 PM

**Name** Alvin Barclay

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I support science-based state nutrient strategy ,I have installed a buffer strip and use grass waterways where needed,in 2013 I will use no-till on my crop ground. We the land owner/ farm operators recognize the importance of properly protecting our soil and controlling runoff and nutrients, this should be a state run program. Alvin Barclay

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**44**.

**Timestamp** 12/6/2012 5:07 PM

**Name** Seth McCaulley

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I support a state-by-state science based nutrient strategy. A one-size-fits-all approach would be difficult to enact across the nation. What works here might be overkill for other people in other states or vice-versa.

On our farm we have installed an additional 30' grass strip around the entire acreage to help prevent runoff from our operation. Now that might not be enough for some or way too much for others, but it is what is right for us. That is how the issue should be addressed in the future as well.

Voluntary implementation of practices has helped our environment and instills a sense of pride. Seth McCaulley



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#45**.

**Timestamp** 12/6/2012 5:46 PM

**Name** Kristi Peck

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

We have used conservation practices on our farm for many many years. You yourself have been out to our farm as a youth. We believe that the correct way for the state to oversee this very vital enviroment in Dickinson County is to have it controlled by the state. Having said that we have implemented the gates for cattle waste management and have spoken with DNR officials on how we can be proactive and keep our facility in good standing. Thank you and Keep it in the states hands! Kristi Peck

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#46**.

**Timestamp** 12/6/2012 6:07 PM

**Name** Darrick Hall

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I support a science-based state nutrient strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. Darrick Hall

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#47**.

**Timestamp** 12/6/2012 6:58 PM

**Name** Stephen McGrew

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I want to encourage you to support a science-based nutrient strategy that allows for voluntary practices on our farm. We use no-till, cover crops, and grid sampling for nutrients. I would like to suggest that we can do better deciding this in Iowa than the EPA can. Stephen McGrew

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#48**.

**Timestamp** 12/6/2012 7:11 PM

**Name** Richard Johnson

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am a fourth generation farmer /rancher in south central Iowa. For generations we in these highly erodable hills have done all we can do to keep our soil and nutrients here on our farms. Grassed waterways, terraces, filterstrips, 100% no till, soil sampling, covercrops, cattle and sheep have all done an excellent job! please keep up your good work in looking after our best interests. Help guide and reign in the EPA to be sure that only science based rules are implemented to help us control nutrient loss. Thank you Richard Johnson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#49**.

**Timestamp** 12/6/2012 7:36 PM

**Name** Darren Luers

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Farmers up and down the road all over the state are making improvement every year. You can see more and more cover crops, buffer strips, terraces and other practices done. I support science base state nutrient strategy and think farmers know best how to take care of there land and water that feed there family and the rest of the world. Darren Luers

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#50**.

**Timestamp** 12/6/2012 7:50 PM

**Name** James Meade

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I use buffer strips, waterways, contour strips, cross compartment planting, crop rotation, no-till and other means of minimizing erosion and runoff. I am not participating in any farm bill programs that give me any impetus or incentive to do this. I do it because it is right for the land in the long run.

My fertilizer use is dictated by the needs of the crop being grown. I do not apply fertilizer that is not warranted.

I strongly oppose imposition of federal mandates on Iowa agriculture. We must be proactive to use the land responsibly and keep oversight within the state. James Meade

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#51**.

**Timestamp** 12/6/2012 8:43 PM

**Name** Barb Schomaker

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

We need to maintain agricultural production and have a science-based state nutrient strategy that recognizes the importance of voluntary conservation practices.

My land is pretty level but I have put in waterways so the soil would not erode. We also do not work our ground except for the strip till that we do in the fall. We also use only the amount of fertilizer that is needed to grow corn/beans.

Let's strive to have a science-based state to protect our water and farmers. Barb Schomaker

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#52**.

**Timestamp** 12/6/2012 9:03 PM

**Name** Mark Keast

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

Have you ever had one of those caps that says "one size fits all" and was disappointed with the fit"

Well, "one size fits all" conservation as the EPA suggests, will be a disappointment as well. Even farms within a two mile radius of the land I farm require unique to the farm conservation practices.

Terraces, sod water ways, native grass filters along creeks and tributaries are used on the hills of this farm, while a river bottom farm one and one half miles from here require different conservation plans.

It should be up to each state to adapt conservation plans unique to their area. Thus allowing local conservation offices to work with conservation minded land owners and farmers, like myself, to create and implement conservation plans best suited to the landscape of that unique farm. Mark Keast



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**53**.

**Timestamp** 12/6/2012 9:16 PM

**Name** Russell Kurth

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I support a science-based state nutrient management strategy that recognizes the importance of voluntary adoption of the conservation practices that best suit my farm and my management style.

I already have terraces and grass filter strips on the land I farm. I planted some cover crops last fall after chopping corn silage.

I plan to do what I can to keep my soil and nutrients on my farm. Russell Kurth

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#54**.

**Timestamp** 12/6/2012 10:08

**Name** Brent Naeve

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

As an Iowa farmer, I support science based, voluntary conservation practices as a state nutrient strategy. I currently use filter strips, even after the contract and payments have expired. I plan to expand a couple habit areas for the coming season. As humans, we all are more likely to do the right thing because we want to than because we have to and I believe in this situation, will be more effective. Brent Naeve

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #55.

Timestamp 12/7/2012 4:30 AM

**Name** Tami List

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

Let Iowa do what's best for Iowa. Contrary to what the EPA may think, we have our best interest at the center of our farming practices. Our farm is terraced and has ample grass waterways protecting the fields and creek area from erosion and chemical run off. Leave the State of Iowa to police it's own voluntary conservation practices and utilize the science that we have at our disposal to protect our environment. Once you let big government in, they rarely find themselves a hinderance and don't know when to leave. The EPA does not have farmers' best interest in mind with over regulation and farmers define Iowa. Please support a science-based state nutrient strategy. Tami List

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#56**.

**Timestamp** 12/7/2012 4:44 AM

**Name** Brandon Beenken

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

As an Iowa farmer I support a science based nutrient strategy that recognizes the importance of a voluntary conservation plan. With land conditions in Iowa a one line conservation plan for the state will not work. The farmers in Iowa are here to protect the land and preserve it for the future. Brandon Beenken

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#57**.

**Timestamp** 12/7/2012 6:30 AM

**Name** Carol Raasch

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

Please add my voice to the record of one family who has been consistently, through over 40 years of agricultural "tilling of the soil", caring for and conserving our piece of Iowa's soil. We have installed terraces on slope that was not yet protected, we have built waterways of mathematically calculated size to handle any large rain possible, and continue the corn and soybean residue practices that prevent the losses of Iowa's precious soils. My sons and I protest any use of a "one size fits all" kind of approach from the EPA to require what, for the most part, Iowa's farmers have been doing and will continue to do for a long time. We drink and use the water from the same sources as our city brothers and sisters. We will not jeopardize our soil and water in order to make another dollar. Thank for reading my comments. Carol Raasch

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#58**.

**Timestamp** 12/7/2012 6:52 AM

**Name** David Irwin

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I would like to take this opportunity explain why I believe a voluntary and science based approach to nutrient management is necessary to maintain agricultural production.

If the EPA is allowed to take control of this problem,all that will happen is a costly uncontrolled and unsuccessful government program that will compare to the so called "fiscal cliff" syndrome we are experiencing today. The farmers in our state for the most part are conservation minded, and they know that nutrients and chemicals entering the watershed is an expensive expense because the products are not being used to produce the crop.

I have been using conservation practices on my farm

since the early 90's. I have been enrolled in the CSP program. I no till all of my acres. I use terraces and contour practices. I apply my turkey litter using soil tests and nutrient content of the litter to determine the rate of application. I encourage my customers that purchase my excess litter to use the same methods I do to protect the environment and to save money. Another point that I would like to make is that if you hold the soil in place, the nutrients stay in place. Soil conservation will play an important role in solving this problem.

The farmers of our fine state are ready to attack this problem head on. In the long term they realize that it has to be addressed for the future generations and for economic success. David Irwin

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#59**.

**Timestamp** 12/7/2012 7:37 AM

**Name** Bill Welch

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I support the science-based state nutrient strategy for the voluntary conservation practices and the need for it. I have updated my water ways and have kept up my strips along my creek. I feel this program is very important. Thank you. Bill Welch

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**60**.

Timestamp 12/7/2012 7:42 AM

Name JIM FITKIN

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Voluntary resource conservation has worked and will continue to work to maintain water quality in Iowa.

I will address contamination of our aquifers as that is the primary concern in my area of northeast Iowa.

I should first note that this is a long term problem and correcting it will take many years. Results will take up to a generation to appear. Government regulations tend to demand immediate results, rendering them ineffective.

I farm land on the north side of Cedar Falls. The nitrate levels in two of the city's wells near by are rising. So they are wrongly blaming me. But in the last several years I have cut back on the amount of anhydrous applied per acre (100 lbs.) in a corn soybean rotation. The soybeans supply another 50 to 60 lbs. of N. I apply the anhydrous in the spring to help prevent it's movement out of the root zone. We are also using nitrogen stabilizers to hold the nitrogen in the root zone until the plant needs it.

N stabilizers were not used until recently, so the impact on the aquifer has not appeared yet. The USGS has tested the city's water. That is how they became aware of the nitrates. But the USGS also told them that any reduction in the sources of nitrates will take 20 years to appear in the well water used by Cedar Falls. The USGS has the ability to "age" the water and has determined it takes about 20 years for it to infiltrate 150 feet into the aquifer.

My contention is that I have already taken the corrective steps and the nitrate levels will drop in the next 10 to 15 years. Also the water in the aquifer is flowing like a river, only at a much slower rate. So the water being used by Cedar Falls originated many miles to the north.

My conclusion is that voluntary cooperation is working and over time results will become evident. JIM FITKIN



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**61**.

**Timestamp** 12/7/2012 8:59 AM

**Name** Jonathan Bakehouse

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

We began implementing conservation practices on our farm more than 10 years ago. We started with no-till, then put in buffer strips followed by two small ponds placed to reduce runoff, voluntarily planted non-productive acres to native grass, and most recently started planting cover crops. We plan to expand our cover crop acres while maintaining our buffer strips and native grass stands.

I wouldn't mind a state-based, scientifically driven nutrient strategy as long as that strategy recognizes what we and other farmers have already been doing. I would even be amendable to tweaking our current practices to bring them in line with such a strategy.

Nutrient strategy is not a problem in need of a one-size-fits-all approach. Please support a local approach to a local issue we have already been addressing for a decade. Jonathan Bakehouse

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#62**.

**Timestamp** 12/7/2012 9:02 AM

**Name** Dona Mae Matthiesen

**City**

**State**

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

We support a science-based state nutrient strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. Most farmers implement voluntary conservation practices and include plans in their future farming practices.  
Dona Mae Matthiesen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#63**.

Timestamp 12/7/2012 9:34 AM

**Name** Jerome Jirak

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am a 4th generation farmer and thankfully the last. My son would have been the 5th. I don't farm any more what I do is fill out government forms and try to comply with countless meetings of certifications on how to raise pigs, chase pigs, haul pigs, haul manure, site inspection to make sure the buildings are up to government whims, chemical certification for spraying and so on, you get the idea. So thankfully my son is now an electrical engineer at Intel and makes more money than my farm can generate for three families.

Now that you have a little background from where I come from. I would love a science approach but it never will happen, many years ago when the dead zone was being studied, scientist wanted to put trace elements in the cities sewer system to see how much they were contributing to the nutrient problem the government would not allow it because the correct politics were to blame the farmer then tax the fertilizer to make more money for the government.

Farmers were ordered to put in waterways and buffer strips to conserve the land. In the 2008 flood the farmers were blamed for the flood because of the waterways and buffer strips.

Why in the USA do people who do not have a clue on anything and never worked for the private sector all they know is government control especially obama get to write all the rules for the rest of us who actually produce products"

The last election has shown us the end. The takers now outnumber the producers. The zombie wars are coming. Jerome Jirak

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**64**.

**Timestamp** 12/7/2012 9:36 AM

**Name** Roger Dreeszen

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

As usual, the radicals in the state are trying to impose drastic regulations on Iowa farmers regarding soil loss. I have been no-tilling since 1977 and believe this is at least part of the answer to erosion problems. Encouraging farmers to look into conservation practices is the answer, not government regulations! Roger Dreeszen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**65**.

**Timestamp** 12/7/2012 9:43 AM

**Name** Steven Riesselman

**City**

**State**

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

I do support a science-based state nutrient strategy. On my farm, I apply conservation practices such as; no till planting, contour grass strips, and CRP strips along the creek running through my land.

Over the years I have witnessed far less erosion and have provided a habitat for wildlife.

I am a strong supporter of voluntary conservation practices. We need to maintain those practices to provide food, fiber and fuel for the future.  
Steven Riesselman

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#66**.

**Timestamp** 12/7/2012 9:47 AM

**Name** Frank Klahs II

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

There is no one more concerned with conservation than the people engaged in farming. As part of the agriculture community we voluntarily practice conservation in several ways. On our farms in Buena Vista County we do not till any bean ground, we do not apply anhydrous ammonia and we have filter strips on both sides of all the creeks on the land that we farm. We do not plow any land, we use a disk chisel only. We use water from our own well. The water has been tested and passed with flying colors. We are good stewards of the land and water because our lively hood depends on it. Adding more and more regulations is not needed for us to protect our land and water. Frank Klahs II

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**67**.

**Timestamp** 12/7/2012 10:12

**Name** Charles Souder

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I applaud the cooperative work with ISU, DNR and IDALS you are accomplishing in pursuit of Iowa's Nutrient Reduction Strategy.

Farmers do not want to lose our soil nor plant nutrients. Thin margins obvious in today's Ag marketplace dictate a monetary and moral requirement to practice good husbandry of our resources; If we don't use it correctly, we will lose it.

In the past 5 years we have completely tilled all 400 acres we own and farm. Much of this land had some tile installed as early as the 50's (hand-dug clay) and more in the early 70's (trenched Hancor tubing). Of course, when wet spots are tilled, the wet spots simply move, so surface run-off during heavy rain events are not significantly abated.

All our land is not pattern-tilled on 60 to 45 foot spacings. Benefit to the land (and check-book) has been significant - reduced run-off erosion, slower excess water released into our creeks & river systems reduce the impact of flooding, increased soil pore space which promotes nutrient retention and increased plant access are just a few benefits from properly drained (tilled) land.

In addition, we have 12 foot grass borders around practically all our cropped land for at least 25 years and have a field windbreak of Eastern Red Cedar along 3/4 mile field border. You should see the snow, neighbors' snirt and birds the windbreak collects.

Not until 2010 were we compensated via the CSP for establishing these conservation measures. So, beginning in 2010 we refurbished the field windbreak, added more grass borders and began recycling used crankcase oil to a qualified recycler.

We also use grid soil sampling and VRT fertilizer application. I don't know what else I can do!"!"

We do not need mandatory conservation measures. We need more education of some farmers but, more importantly, education of those who carry perceptions farmland drainage tile is the root of all evil flooding and farmers do not give a rip about conserving our natural (and self-applied) assets.

Thank you for your hard work! Charles Souder

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#68**.

**Timestamp** 12/7/2012 10:27

**Name** Luke Schuldt

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I support the voluntary conservation approach. We as farmers want to do everything we can do to keep our soils. I personally have gone to less fall tillage and am looking into using cover crops in the future. Luke Schuldt



**Name** Nicholas Podhajsky**City****State****Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

I am writing to express my support for a science-based approach regarding the water quality issues in the U.S.

Farmers want clean water as much as any citizen, however, we also know that one-size-fits-all programs do not generally work, most especially in agriculture. There is tremendous variability across the nation in soil types and slopes that impact the ability of best use of the land. I farm some land that requires minimum/no-till and some that can be conventionally tilled without erosion problems. In my operation, I am doing just that. I don't till anymore than I have to currently.

In addition to tillage reduction, I also use terraces and waterways to hold the soil in the field and continue to shed the excess water.

As far as nutrient use, fertilizer in all forms is very expensive. I have been using precision technology to properly place the right amount of fertilizer in the right locations in the field. Inefficient uses of fertilizer becomes a very expensive waste for both the environment and my pocket book.

Farmers are already doing a good job of managing their fields. Can we do better, sure. However, a wide spread, overreaching, non-science based approach to regulation is not the proper way to promote water quality. Nicholas Podhajsky

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#70**.

**Timestamp** 12/7/2012 11:42

**Name** Patrick Lynch

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

We have 3 generations currently working together on our family farm and we all know that conservation of our land and water is the only way we can continue to be profitable. We are installing terraces, grasswaterways, 2acre grid sampling so we only apply the nutrients the crops need. I believe a state strategy that is founded in good science with a goal of educating producers would be more productive than federal mandates. Patrick Lynch

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #71.

Timestamp 12/7/2012 12:04

**Name** Abigale Paul

**City** Indianola

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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At first when I read that this document was a science and technology-based framework to assess and reduce nutrients to Iowa waters and the Gulf of Mexico, I was encouraged until I read on. Mathematics is part of both the Science and Technology fields and saying that continuing to force unfunded mandates on point source contributors, who contribute 8% N and 20% P, is acceptable while allowing the 92% N and 80% P contributors to continue with voluntary actions is ridiculous. I respect and understand farmers' contribution to producing the food to feed the world (as stated many times throughout this document). I don't think it is appropriate to make every single farmer pay tens of thousands of dollars to turn their fields and pasture into standard conservation templates. But if a future goal is to look at the watershed level for nitrogen and phosphorous delivery it can be assumed that certain farmers could be identified as major contributors to this problem. When these areas are identified there should be some level of mandate on the property owner to reduce the nitrogen and phosphorous amounts leaving. Not all farmers are bad apples readily polluting our streams, but in this time of high crop/meat prices some farmers are cutting corners to make the extra dollar. You can see it when driving the countryside, fields that are planted up to adjacent streams with no buffer. I think if this document is to be fair and balanced some type of process should be outlined to identify and correct farming areas that runoff larger than average levels of nitrogen and phosphorous. My take-home from this document is that NDPES permit changes are coming regardless of what this document says (so to take credit for that is an easy out) and nothing is planned to change in the agricultural community. I just hope the EPA will see it for what it is & here is a bunch of words and studies that show that this document did what we thought you asked, but we have made (and plan to make) no changes to the current course we are on.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#72**.

**Timestamp** 12/8/2012 6:28 AM

**Name** Max Trimpe

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Some practices that have been implemented on 80 acres two farm ponds, two wetlands, grassed waterways, 6 terraces with the intent of erecting 3 more in the future. Installing tile on the contour to redistribute the water not just get rid of it . With the price of inputs the farm can't lose the NPK that would leave the land and enter a water way or travel across the fence to my neighbor it is then lost and needs replaced. HEL land is a challenge to to farm but with the partnered help of NRCS I have been able to get things done on a accelerated timeline. I'm NOT sure I would get this done with a larger Federal program with partners more than half a state or farther away. Max Trimpe

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#73**.

**Timestamp** 12/8/2012 7:45 AM

**Name** Keith Meitner

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                               **Point Source**

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Secretary of Agriculture Northey,

I am a farmer who uses conservaion practices voluntary. In the past I applied for gorvernment assistance to shape a water way and completed it to their specifications. The project cost nearly double what it would have cost without cost sharing because NRCS required a much larger project than my contractor said was needed. Now I let my contrator do what is needed and do not use government assistance. Most farmers want to save their land for future generation and do not like government involvement. Keith Meitner

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #74.

Timestamp 12/8/2012 10:19

**Name** tom hoff

**City** iowa city

**State** iowa

**Providing comment on the following sections:**

**Executive Summary**  **Nonpoint Source**

**Policy**  **Point Source**

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Nothing new here. Every person knows what needs to be done. We just need to do it and a completely voluntary program has not worked and will not work. Voluntary behavior does not work for traffic speed laws, truck weight limitations, shoplifting, fire codes, etc., etc. The people of this state and states south deserve better than polluted water and more excuses, and smoke screens. Fund the program adequately to help the farmers implement change and then require them to make the required changes.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #75.

Timestamp 12/8/2012 11:11

**Name** Mark Bohner

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

This is a good report to improve water quality in Iowa. I like that we are getting baseline information so progress can be seen. I look forward to know which practices make the most cost per practice/ amount accomplished sense. Our farm will likely use more cover crops in the expense make a difference.

We already use buffer strips and waterways on our farm. If there are other practices identified, we look forward to using them. Mark Bohner

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#76**.

**Timestamp** 12/8/2012 11:15

**Name** Robert Smith

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

As a farmer for many years, I find it sad that people think I would buy and spread more fertilizer than needed - profitable. I use the Ames guidelines to buy and spread the amount of P and K that a crop takes off, only exceeding that amount for an application on a two year basis. I apply N based on an N calculation guide and my expected crop yield. All are approximations but I stay close to recommendations because to apply more is to decrease my net income --- that my wife and I live on. Robert L. Smith Robert Smith



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**77**.

**Timestamp** 12/8/2012 8:19 PM

**Name** Gerald Morgan

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I think it is important to use science-based state nutrient strategy that recognizes the importance of voluntary conservation practices and the need to maintain agriculture production. I have been building new and improved water ways on my farms, and also building grass buffer strips.  
Gerald Morgan

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#78**.

**Timestamp** 12/8/2012 9:47 PM

**Name** Casey Schomaker

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I support the voluntary conservation works. The farmers know best what the land needs that they farm. They care for the land and know how to handle problems for the ground that they farm. On our farm we do strip tilling, have terrices, seeded waterways. These are the things that are best for our farm. We know this because we are out there working the ground. Not because someone told us. Casey Schomaker

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#79**.

**Timestamp** 12/9/2012 8:24 AM

**Name** Steve Ludwig

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

We do not need the federal government assuming they have all the answers for conservation practices that effect the people of Iowa.

The farmers I know in the Cedar Vally area have been applying conservation practices for decades trying to imaintain or improve our soils.

On our farm, for example, we have been contouring since the early 1950s. The last fifteen to twenty years we've added buffer strips along creeks, filter strips on hillsides, waterways carrying water down the hills from our contoured rows, and no till. We recently started to asses verticle tillage.

I will grant you there are still farmers that don't contour or make use of, or even try, some of the newer conservation practices that have been proven to save soil and water. Instead of more beauracrats roaming around costing money, lets use some of the extension people we have available in a more agressive way. Why not have these folks talk to the people not keeping up with current practices to show these farmers what can be saved.

Thank you for taking the time to read my comments. Steve Ludwig

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#80**.

**Timestamp** 12/9/2012 9:39 AM

**Name** David Fordyce

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Sec. Northey, I just wanted to let you know my thoughts on nutrient strategy. All of the farmer-friends I have have a vested interest in taking care of the land. We want to be good stewards. We feel that it is our obligation for the opportunity to own and farm the land. And we will continue to do so. David Fordyce

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#81**.

**Timestamp** 12/9/2012 1:24 PM

**Name** Steve Hanken

**City** Cedar Rapids

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                               **Point Source**

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The expectations of "voluntary" compliance is completely out of the question. If farmers and others who discharge intentionally or through non-point source ways had complied in the past, this situation would not have been drug out as long as it already has. As I recall, it was only a few years ago the DNR was down grading streams in order to "improve" them, that being said, all it really did was take the offending streams out of the mix that would have required much money to improve due to the non point source polution and even in some cases small town point source polution of streams. Lots of effort was put into making sure those streams were not being utilized for recreation by the public so it would be easier to down grade the stream. Nothing really changed other than it made the requirements less restrictive on how long sewage lagoons could remain active, "eventually" they would get some treatment facilities in place at some future point. The point is we can't wait any longer. We need to get this business of nutrient run off solved and voluntary measures have not got the job done. To assume the capitalist base system we have has any intention of cleaning up it's own mess on its own nickel, flies in the face of the profit motive. The longer the foot dragging contuinues, the worse the problem will get. Enforcement with fines and jail time will make the state of Iowa come into complience in the shortest time possible. Having to pay out of pocket the fines will only help pay for the work that needs to be done and jailing a few people will make it patiently obvious the government means business. I for one look forward to the EPA rejecting this final offer of the state to control its own waste and run off, and fully hope the EPA takes over control of what has been a dismal failure for far to long.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#82**.

**Timestamp** 12/9/2012 1:34 PM

**Name** Virginia Nichols

**City** Ames

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Voluntary participation in conservation tactics will not address the issue - there must be economic penalties for nutrient loading water we all share. I am very disappointed in Iowa's proposed approach to responsible nutrient management. Literature has shown that Iowa loads the Mississippi with more than their fair share of damaging nutrients - it would behoove the state, as a leader in commodity production, to act as a leader in environmental responsibility as well.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**83**.

**Timestamp** 12/9/2012 3:51 PM

**Name** Kathleen Kruse

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

Please support a State of IA plan to help control the nutrients in our states streams, waterways and wells. We do believe that the implementation of such a program would be best operated on a local level.

We have farmed all of our lives, and have practiced smart farming activities that benefit the land we live on. For example: strip cropping, building terraces, implementing generous grass valleys and head lands, and no till are some of the beliefs my husband has practiced and is teaching our sons also.

For the most part, our people involved in agriculture, take very serious the care they give to the soil and environment. Kathleen Kruse

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**84**.

**Timestamp** 12/9/2012 4:20 PM

**Name** Stephanie Dykshorn

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

People who live on the land and rely on it for their livelihood are the most likely ones to take the best care of that land/water/air that they and their family come in contact with daily. As a farmer, living in rural Iowa, I would like to see a science-based and state or area specific nutrient strategy that will give us voluntary conservation practices. As I said, we live here, we're probably already putting many of these practices to use so we can ensure our opportunity to pass our farm on to our children. Stephanie Dykshorn



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#85**.

**Timestamp** 12/9/2012 4:29 PM

**Name** Gene Sievers

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I have been using conservation tillage on my farm since 1980. I do no fall tillage on my beans in the fall and I leave at least a 50% residue on my corn and bean fields after planting in the spring. I have not plowed in 32 years. I use Iowa State University's recommendations and guidelines. I have used all of these practices and more without the government regulations, because I care about my land. I do not want to lose it or the nutrients I put on it. Most farmers I know do all they can to do the same. Land varies from county to county and state to state. I don't know how the national government can make 1 rule that is the same for every farm. I am asking that you support science-based state nutrient strategy and voluntary conservation practices.

Thank You. Gene Sievers

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#86**.

**Timestamp** 12/9/2012 6:46 PM

**Name** Joel Huber

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Please work to make sure that nutrient reduction practices remain voluntary and science based.  
We work hard on our farm to hold topsoil in place and retain nutrients. Joel Huber

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#87**.

**Timestamp** 12/9/2012 7:38 PM

**Name** Barbara J. Andersen, Ph.D.

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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ANR Program Services,

I am very concerned about this report and policies that are recommended in it. Nonpoint source water pollution from many of Iowa's agricultural practices are responsible for farm chemical runoff into our surface waters in Iowa and ultimately into the Gulf of Mexico. Voluntary measures for farmers are ineffective in reducing runoff of these chemicals. This plan needs to make water pollution reduction mandatory and immediate. Financial resources should be directed from the state to preserve and protect Iowa's streams and rivers. I urge the state to guarantee that sufficient funding be provided to drastically reduce farm chemical runoff.

Thank you for the opportunity to comment.

Sincerely,

Barbara J. Andersen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#88**.

**Timestamp** 12/9/2012 7:55 PM

**Name** Kenneth Gard

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I support voluntary conservation practices that maintains our agricultural production. We've installed many miles of terraces and "638's where needed. My family owns over 1000 acres of land that is mostly terraced. We farm using mostly no-till. However, for those who refuse to accept the message of conservation, we need a stick to encourage them to volunteer to do conservation. We've had many miles of terraces removed in our county in the last several years. The per acre dollar limitation on soil loss complaints should be increased. Perhaps to twenty dollars per acre and no cost share if none is available. Kenneth Gard

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#89**.

**Timestamp** 12/9/2012 8:07 PM

**Name** Tim Diamond

**City**

**State**

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

I think it is very important that the state of Iowa use the science-based nutrient strategy which uses voluntary conservation practices. If the EPA gets the control I fear that they will ruin the ag industry with their radical policies. I'm confident that farmers will do the right things to protect our waters. On my farm we are using buffer strips, split applying nitrogen, and using less tillage to grow more corn than ever. We are getting record yields using 20% less nitrogen than we used 15 years ago. I think farmers understand what needs to be done. Tim Diamond

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#90**.

**Timestamp** 12/9/2012 9:09 PM

**Name** Clayton Reints

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                               **Point Source**

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Secretary of Agriculture Northey,

We need to support a science-based state nutrient strategy. There are many variables among crop production areas such as weather, soil types, and cropping practices. One practice does not fit all.

We currently implement no-till and strip till practices on our North Eastern Iowa farm. We currently see many benefits from our conservative approach. Additionally, we feel we are able to slightly reduce fertilizer requirements in the strips and maintain high yields. We are seeing great soil structure and water holding abilities.

We plan to continue our voluntary conservation practices. Clayton Reints

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#91**.

**Timestamp** 12/9/2012 9:20 PM

**Name** Randy Wuebker

**City**

**State**

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

Voluntary conservation practices are very important to many farmers and ranchers. Conservation is very important to me and my family; we want to leave the farms we work to be in better shape than when we started. We accomplish this a lot through voluntary conservation practices. We implement no-till and minimum-till practices as well as tile, terraces, waterways, buffer strips and border lands where needed on the land we farm. We do this on a voluntary basis to help protect and improve the environment, and because it is the right thing to do. Please support for science-based, voluntary conservation practices for agriculture production. Thank you. Randy Wuebker

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#92**.

**Timestamp** 12/9/2012 9:32 PM

**Name** Brian Hoffman

**City**

**State**

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

I support a science based state nutrient strategy that recognizes the importance of voluntary conservation practices while still maintaining ag production. On our farm we have voluntarily added terraces and plant on the contour when needed. By doing this we have not only improved and saved precious soil but insured that future generations will be able to continue to help feed the world. Brian Hoffman



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#93**.

**Timestamp** 12/10/2012 10:20

**Name** April Hemmes

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I have been farming for 28 years and a Soil and Water Commissioner in Franklin County for almost 20 years. I started farming with my father and grandfather. I learned through their conservation efforts that we always planted the alfalfa on the side hills and lighter soils. This prevented soil loss of the highly erodible ground. We also kept out distance farming along the streams and kept up our waterways. I have also put in a wetland where the ground is too wet to farm.

All of these practices our farm has done on it's own without any government intervention. I know farmers in Franklin County use the cost share available to improve their land to have a more sustainable future.

Farmers know what is best for their land. It is best to move forward with the science based nutrient strategy plan for Iowa. I truly believe in the voluntary efforts, not government mandated, of today's farmers and want nothing more than to leave the ground I own in better condition for my children. April Hemmes

**Name** Bob Watson**City** Decorah**State** Iowa**Providing comment on the following sections:****Executive Summary****Nonpoint Source****Policy****Point Source**

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Op-Ed (12-2-12)

In the Des Moines Register's series on the dead zone in the Gulf, corporate agriculture apologists repeated their excuses for not addressing agriculture's major role in the pollution causing that dead zone. According to apologists, most erosion and pollution from Iowa may not really be from the 30 million acres of farmland in Iowa. That pollution might be from a few hundred golf courses, some urban lawns, and regulated wastewater treatment plants. We also heard that regulations don't work in agriculture, and that farmers should be allowed to pollute because they feed the world. Further, we were told farmers are conservationists who already work to limit runoff, erosion, and pollution.

Pollution from wastewater plants (point source pollution) has actually declined due to ever more stringent regulations. Meanwhile the waters of Iowa and the Gulf continue to become more polluted with each passing year due to non-point source pollution from agriculture. Understanding this phenomenon, the EPA directed states to come up with strategies to reduce that pollution.

After some years of study, Iowa's strategy is contained in the IDALS' Iowa Nutrient Reduction Strategy document. The extent to which corporations have taken over our government, as shown by this document, should give us pause. Technically, many of the promoted practices have little real ability to deal with runoff, erosion, and pollution on the scale that is seen. And, this strategy ends up being just another 'we wish the farmers would do' list because the document contains no 'implementation instrument' to ensure adoption.

The question whether any strategy can fix this recently adopted petro/chemical/industrial model of agriculture is not even asked. This recent model is extraction based, petroleum based, and inherently polluting (because of how it works, it has to pollute). Research presented at this year's US and Canadian Great Lakes Conference suggests no-till may be causing new dead zones in the Great Lakes. If so, this would be a major blow to this model's no-till being promoted as a conservation method.

An Iowa Nutrient Reduction Strategy is necessary only if we assume we will keep using this inherently polluting petro/chemical/industrial model of agriculture. We don't need to. There are models of agriculture which exist today (edible perennial prairie, forage crops, prairie buffer strips, etc), that can clean up our water, reduce erosion, runoff, and pollution, and that are biologically benign and clean. Go to [www.civandinc.net](http://www.civandinc.net) and click on appendix D to see models that exist today, that can be adopted wholesale today, and that will return agriculture to a non-polluting, non-flooding, soil building system adaptable to both a future of intense rain events and major droughts.

Bob Watson

2736 Lannon Hill Rd

Decorah, IA 52101

[bobandlinda@civandinc.net](mailto:bobandlinda@civandinc.net)

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#95**.

**Timestamp** 12/10/2012 1:51

**Name** rob wagner

**City** north liberty

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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We need to clean up our water, i think we rank last of all 50 states about how clean our lakes and rivers compared to the other states. Profit is not an excuse for looking the other way or voluntary enforcement. What will our waterways be like if we let the Farm Bureau set policy. We need to address this, so our children will have not have to be forced to leave the state to recreate on clean waters. We have very little public land for enjoyment on, and rivers can provide that opportunity if we are good stewards of that resource. Currently we are not doing enough. Your job is to get input from the silent majority ( non farmers)about this issue.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#96**.

**Timestamp** 12/10/2012 2:13

**Name** Mike Hayes

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I find it interesting that all of the small watershed projects I have seen are in the Prairie Pothole Region of Iowa (Palo Alto and Pocahontas Counties). All of these seem to include improved drainage of isolated prairie pothole wetlands as an unseparable part of the plan. Could it be that IDOLS offers better drainage of pothole wetlands as an enticement tool to help convince farmers that they ought to participate? Is this why the Farm Bureau is such a huge fan of the so called "Iowa Initiative"? Cleaner water (free of excess nitrogen and phosphorus) should not require draining wetlands, which are the natural filters/scrubbers on the landscape. I believe that as an Agency, IDOLS stands alone, and not 'really' with Iowa DNR and U.S. EPA in thinking that the way to reduce the hypoxia zone in the Gulf of Mexico is to drain prairie pothole wetlands so they can be more extensively farmed! It is also interesting that you put this Public Notice out in the heart of the Holiday Season. Were you hoping folks would be too distracted to respond?

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#97**.

**Timestamp** 12/10/2012 5:27

**Name** Lula Mae Clausen

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I really don't want the EPA to have the say over Iowa's environment. But I feel there needs to be certain guidelines that everyone has to use as their own guidelines.

I feel that these guidelines should be based on a scientific strategy that will protect the environment as well as voluntarily use good conservation practices to maintain our above average agricultural production.

My land is rented, but I try to see to it that the renter uses good conservation.

Please work with Iowa State University scientists and Iowa Farm Bureau to get a workable solution. Lula Mae Clausen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#98**.

**Timestamp** 12/10/2012 7:22

**Name** Phil Anderson

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I am glad that Iowa is opting to develop our own plans which will account for our unique landscapes, natural resources, and financial resources, as well as the need to maintain agricultural production, as we manage our nutrient run off. Broad spectrum plans by higher levels of government organizations, such as the EPA, have a history of failure on my farm. One example is our grassed waterways. Some of the waterways on my farm were built to NRCS specifications in the early 1990's. We told them that the design wouldn't work, but the engineers said that those were the specifications allowed for Iowa. Sure enough, the waterways washed out in the center and became too deep to cross with farm equipment. We have constructed other grassed waterways to our own specifications - wider and shallower than the NRCS guidelines - and they are maintaining their structure much better and easier to cross than the ones built to NRCS specifications. Phil Anderson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#99**.

**Timestamp** 12/10/2012 9:28

**Name** Rob Cousins

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

A science-based approach to nutrient management is the best way to plan conservation practices. Soil types vary from farm to farm and what may be need on one farm may be the wrong solution for a neighboring farm. This would bring the voluntary part of conservation practices into effect. Operations vary from crops to livestock and the way these farms use conservation also varies. As a livestock farm with a cow-calf herd and sandy ground the cow manure is a great way to add nutrients to the soil. We harvest corn silage off the fields then to conserve the soil from erosion(wind and rain) we sew a cover crop of rye grass. Rye grass protects the soil and in the spring it grows rapidly producing a crop that can be grazed as the cows have calves. It is an excellent enviroment for the cows and helps protect the soil from heavy spring rains. The cows graze the rye down and then the fields are planted back to corn silage. The plants of rye add humus back into the sandy soil along with the cow manure this reduces the need for fertilizer. Urea is added at the rate of 100 units per acre and this is the only amount of fertilizer used to produce the corn silage. This process has been used for many years and it benefits both the ground and the livestock. This has worked well for our operation. Rob Cousins

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #100.

Timestamp 12/11/2012 6:59

**Name** Steven Lee

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I support voluntary conservation practices and a science based nutrient strategy to limit nutrient run off into streams.

Some things I am using on my farm now to control run off and erosion include, terraces, grass water ways, contour farming and no-till planting. I do not apply nitrogen fertilizer in the fall. I have land owners with ground in the CRP including wetlands.

I will continue to improve my water ways and am considering the use of cover crops on my more highly erodible ground.

Thank you for the work you are doing to help solve this problem. Steven Lee



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #101.

Timestamp 12/11/2012 7:08

**Name** John La Fratte

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support a voluntary conservation practice program based on an individuals given area. John La Fratte

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**102**.

**Timestamp** 12/11/2012 8:21

**Name** Barbara Harre

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

The plan to address the nutrient concerns based on a valid scientific approach is most welcome. I believe a majority of Iowa landowners would embrace such an effort. We have planted 7000 trees in a riparian buffer strip along a 1/2 mile of stream in Cedar county. We also tested water as the project moved along and did not find any problems with run off even with a cattle feedlot north of us and its potential run off. We were testing the water every month. We have also fenced animals away from the streams. We are looking into cover crop usage. We utilize soil testing to determine more accurately what is needed where. Iowa and Iowa State have been leaders in addressing these concerns. I applaud the continued partnership. Barbara Harre

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #103.

Timestamp 12/11/2012 9:16

**Name** Robert Casterton

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support the nutrient reduction strategy recently announced by Governor Branstad. Two key points are that solutions are based on scientific study and adopting solutions is voluntary. First, research and study with a science base will help develop solutions that work and last. Second, voluntary efforts with some incentives gives landowners a stake in the solution, and in my opinion, has a greater chance at being successful.

On my farm, we have added waterways and filter strips over the last 15 years. Both have helped to significantly reduce erosion and runoff. We are also minimizing tillage, and have gone to applying nearly all of our nitrogen after the crop emerges, reducing loss and runoff from fall and early spring applications.

Again, I support the nutrient reduction strategy. Robert Casterton

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**104**.

**Timestamp** 12/11/2012 11:55

**Name** Marcus Urelius

**City**

**State**

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

I fully understand the need to reduce the nitrate and phosphorus runoff in the Mississippi river basin. However, I strongly believe that each farmers situation relating to nutrient conservation is different. Thus, any one size fits all practice imposed by the EPA would very likely be burdensome and inefficient.

On my farm we employ buffer strips around drainage ditches and terraces to limit runoff into the river system, as well as CRP ground. Fall tillage is also limited to discing stalks, to leave a high residue ground cover through winter. N and P application is done in the spring ahead of the planter to eliminate winter runoff with the snowmelt. In the future I would like to move to summer side dress application to further reduce the time for the nutrients to leach out before used by plants.

I am willing to look at new conservation practices if they are proven effective by science. If a way can be found to meet the worlds food and energy needs, and reduce environmental impact, farmers will listen. Marcus Urelius

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #105.

Timestamp 12/11/2012 1:13

**Name** Steven Thompson

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Iowa farmers want to conserve their land and crop nutrients. We will do what makes sense to reduce nutrient losses. Research to find the best practices is needed if we need to make changes in our farming practices while still providing the food the world needs. Although we are using our land more intensively than years ago, we are also using many more soil conserving methods.

Thank you for your leadership Steven Thompson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #106.

Timestamp 12/11/2012 1:22

**Name** Ivan Droessler

**City** Storm Lake

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I am a PE that works with producers on waste management and agricultural drainage. The State of Iowa has been on the forefront of developing Nutrient Reduction Strategy. IDALS working with ISU have been researching best management practices at the Gilmore City Research Site for 20 years. They have been a leader on the US Hypoxia Task Force with the Iowa Pilot Project where the use of wetlands to treat nitrates in tile drainage is proven to be very effective.

The State has done an excellent job in preparing the Iowa Nutrient Reduction Strategy where they are using science to develop a reasonable and achievable policy. It is critical that the Iowa plan offers farmers options to choose voluntary practices that best work with their soils and land use practices. A one-size-fits-all model that limits choice will not work and will be opposed by farmers every step of the way. Getting producers buy-in is critical for any program to work and providing choices allow the producer to be in control of his operations.

45% reduction in nitrogen and phosphorus in the leading agricultural State in the US is difficult to achieve at best. It will take the combination of practices for the varying soils and land uses throughout the State to make this happen.

In addition, finding a balance between Strategy for Nonpoint and Point Source reduction is critical. It does not make sense to be treating human waste and then discharging the nitrogen and phosphorus right into the waters of the State. The Strategy explains the science behind it and the realistic results that can be achieved with reduction technology.

It is important that our Government remember the importance of production on fewer and fewer available acres when the US leads in feeding the world. We need to find a balance in reducing our impact on waters of the US at the same time achieving the production needed to feed the world.

In summary a strategy with voluntary choices over a regulation one-size fits all approach as outlined in this report is strongly supported by producers and engineering professionals in this State. I support the Strategy as prepared.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #107.

Timestamp 12/11/2012 2:13

Name Chris Green

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please continue to push for the importance of voluntary conservation practices in the science based state nutrient strategy. I personally have done many land conservation projects on my own farm. For example matching fertilizer to the productivity of the soil type and crop to be grown, no-till and waterways where any type of erosion could happen. I hope to further invest in more variable rate technology, so that I can spend less, conserve resources and be more productive. Please continue your work on this and while all farmers may not know of the effort you put in, the ones that do appreciate it. Chris Green

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #108.

Timestamp 12/11/2012 2:18

**Name** Mary Sue Kislingbury

**City** Mason City

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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If Iowa agriculture does not step up and be responsible for its part in reducing waterway pollution it will become more and more irrelevant in our state's economy. It will increasingly lose its positive image and become disenfranchised from its proud heritage. The governor's proposal is a sham that really does nothing to clean up our waterways. It makes Iowa a poor neighbor!

Respectfully Mary Sue Kislingbury and John Pokladnik



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #109.

Timestamp 12/11/2012 3:44

Name Justin Faber

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would hope that you would support science based state nutrient strategies that we need to maintain agriculture production. We base our nutrient needs by the use soil samples and tissue samples instead of just throwing large amounts of fertilizers on the land. We also split apply our nitrogen so it can be used by the plant more efficently. We do this to not only save money but also to be conservation friendly where we live and drink water from. I don't like going into the city and seeing large amounts of nutrients being applied to lawns and golf courses just as a rain comes and washes it down the storm drains. I then watch the news and we as farmers get blamed for pollution but the city people do not.  
Justin Faber

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #110.

Timestamp 12/11/2012 6:16

**Name** Kevin Pruisner

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Science-based approach is better. Kevin Pruisner

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #111.

Timestamp 12/11/2012 9:19

**Name** Doug Steinkamp

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

As a progressive agriculturist in western Iowa, I have adapted and used many new technologies to conserve our resources. I have been using cover crops for over ten years and have adopted no-till on all of our most vulnerable acres. These systems have made my yields increase as well as conserved soil and water. Most all of these practices have been done voluntarily. Farmers know their land and their situation better than any text book or special government agency with attitude. Voluntary is the way to go, most farmers want to leave the land in better condition for their children to farm in the future. Educate the farmers and they will provide, dictate to the farmers and they will drag their feet and slow down all beneficial technologies. Doug Steinkamp

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #112.

Timestamp 12/12/2012 6:41

Name Vincent Moye

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I see a many other farmers' farming practices as my son and I have a custom fertilizing business as well as have farne fields we farm ranging from Dike, Iowa to Trear to Beaman Iowa. I am seeing that for the most part over half of the farmers do follow some kind of a conservation plan. However; Over the past few years the better practices are slipping away to more and more tillage on steeper land forms that are erosion prone. Since we are in a dry period the last few years it doesn't matter. When heavy rain returns the soil will suffer. The reason is that in some circumstances more tillage does reap a higher yield and more return. It is a very effective weed killer in the spring when the weather is too cold for burn-down herbicides to work. If you want to keep farmers honest about good conservation practices simply have the SCS people survey the fields and then publish the names of the non-complying farmers in the local paper. The farmer will weigh his desire to not be shamed against his desire to make more money. His land-lords will not renew his contracts. Problem solved with no gov intervention. On our farm we use ridge-till and strip-till methods to save water and soil. Vincent Moye

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #113.

Timestamp 12/12/2012 8:21

**Name** Marvin Van Haften

**City** Pella

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Please remember that at the Des Moines Water Works they see a spike in Nitrates every fall and must treat the Des Moines drinking water to remove the Nitrates. This alarming spike in Nitrates is due to tree's losing their leaves into the Racoon and Des Moines rivers and with low river levels and the decay of the leaves in the water there is a spike in Nitrates. As you set Nitrate base line levels please consider this naturally occuring nature event.

Senior Chemist Gordon Brand at the Des Moines Water Works can provide information on this Nitrate removal procedure and situation.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #114.

Timestamp 12/12/2012 9:52

**Name** Michael Garrett

**City** Pleasant Hill

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I believe that all of us (farmers and home owners) need to take better care of our Land and Waterways. I see farmers getting rid of trees and plowing right up to the edge of their land which creates more erosion. Home owners and farmers both use more fertilizers than are needed. We don't need perfect lawns as home owners and farmers need to worry about what the land will be able to grow in the future. Maybe the best thing that could happen is the EPA comes in and takes over for a state government and Governor that is being ran by the farmers.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #115.

Timestamp 12/12/2012 11:37

**Name** Rod Freidhof

**City** Cresco

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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After reading the executive summary, and looking at the estimates for percentages of where the nitrogen and phosphorus are coming from, it's seems as if we're going about this backwards. Doesn't it make more sense to work on the non-point source of the problem first?? I think the biggest problems should be taken care of first, then work our way down to the smaller percentages.

**Name** Wendy Munson Scullin**City****State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

There are some issues I would like to approach; the Clean Water Act is not all about the Gulf of Mexico.

This is everybody's problem. Controlling nutrient runoff requires many of the same soil conservation measures that reduce soil erosion keeping topsoil and all its nutrients on the land for better farming. Iowa topsoil is what makes our farmland valuable and productive. Having lost so much already, we can't spare more. Better control of human and animal waste is safer for surface and ground water. There are opportunities for energy generation from animal waste which are being overlooked because they are expensive. Perhaps the time has come for us to invest in this technology.

A law without penalties cannot be enforced and is likely to be ignored. Voluntary participation is unlikely because using practices that are congruent with the goals of the Clean Water Act cost money and farmable acres at a time when farmers have shifted to using every acre possible, corn-on-corn agriculture, the cost of farming is up, and every farmer must compete with the next bigger farmer. There is little room in such an economy for installation of wetlands, planting a fall cover-crop, rotating alfalfa or hay or re-installing buffer strips. Not without a way to offset the loss of crop revenue and cover the expense of doing these things. If we want this done on a large scale, we need to generate the revenue to make the investment in our state.

Under voluntary participation with the Clean Water Act, farmers who do comply with the law and reduce nutrient runoff will be forced to compete with those who do not. They will be at a competitive disadvantage because non-compliance has led to practices which are not good for the environment, but do have financial advantages for farming. Without penalty, those who exploit the land will face no pressure to stop and those who take care to prevent runoff can't compete. This is THE fatal flaw of voluntary participation it penalizes farmers who take conservation/nutrient-control measures.

Therefore, everybody needs to comply.

Iowans need to take responsibility for controlling nutrient runoff as a state. We need to help farmers find ways to reduce runoff, we need to make sure that small farmers will not bear unfair strain. We need to make sure that fines are levied as allowed by the Clean Water Act for point-source and non-point-source runoff, but we also need to assure that state funding is available to help reduce nutrient release. We need to educate lawn-owners and grounds-keepers about appropriate fertilizer use. We need to work with (invest in) wastewater treatment facilities in small and large municipalities to assure their effluents are satisfactorily treated and they have access to funding to solve problems swiftly when they are not.

We need to tackle this problem as a state because it affects everybody environmentally and economically. We can't point at farmers and say, "It's your problem, fix it and pay for it yourselves. We have to find money (even if it means raising a tax and adding jobs) and have all state citizens effectually saying, "We believe in our state and we support a way of farming that is fair to farmers, preserves topsoil, and keeps us farming strong in the future. We need to help farmers get this under control so we can meet and even exceed Clean Water Act requirements. Iowa could be a leader in nutrient management. But that won't happen if it's a choice. Or a burden. And it won't happen if there are not enough state employees out there, monitoring waters, administering conservation programs, creating science-based solutions, overseeing efforts. This issue must unite us working towards a goal so we can look back at our success and see how much the better we are for it.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #117.

Timestamp 12/12/2012 4:20

Name David Brandt

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I fully support the science-based state nutrient strategy and the use of voluntary conservation practices.

Our 3rd generation farm was extensively terraced in the 50's with the most recent major additions made in 1995. All these original terraces were built with our own money but the many repairs, rebuilds and more recent additions have been financed by both private and county cost-share money.

We also implemented no-till and, if necessary, min-till practices as well back in the 90's.

I hope these conservation programs will remain voluntary for the foreseeable future. David Brandt

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #118.

Timestamp 12/12/2012 8:38

**Name** Bruce Voigts

**City** Clarion

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Maybe a survey or accurate data on what per cent of ALL farmers are employing at least 1 documented conservation practice that does indeed reduce Nitrogen and other nutrients from entering surface or ground waters. Tabulate what are these practices. ARe some farmers not using any conservation practices at all?

Also data on just what is being applied on farm fields would be helpful. This data could be obtained from Coops and agronomists without personal data? Hopefully, this data would be accurate as the data would be what is said is applied, and hopefully this is what is applied. Do we actually know how much of each nutrient is actually being applied to all farm fields?

Encourage cover crops, which research is showing does indeed reduce nitrogen in field tile lines, by offering a quite pleasing monetary incentive. \$80 should be a price to encourage cover crops and help with fears of yield drag with corn.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #119.

Timestamp 12/13/2012 6:37

**Name** Ronald Goecke

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

With the current high level of row crop production, soil saving practices are more important than ever. Therefore encouragement is needed for farmers to volunteer to implement practices of conservation.

I support this state's administration in the proposed science-based nutrient strategy that will provide voluntary incentives.

Even though I have been establishing measures of conservation for many years (no-till, terraces, ponds, native grasses) I plan to put in buffers, increase grassed water way construction and continue no-till methods without any mandates from a federal bureau which would only be an expensive complicated nightmare.

May we go forward with nutrient management in a proper way on a state wide basis. Ronald Goecke

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #120.

Timestamp 12/13/2012 10:53

**Name** Norman Kelly

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Let the science based nutrient strategy handle the water shed situation. On our farm we are using filter strips and C.R.P. These are working well and our water quality has improved. Norman Kelly

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #121.

Timestamp 12/13/2012 10:54

Name Esta Raasch

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

States have two options for reducing nutrients in surface water.

One option is to do nothing and allow EPA to develop one-size-fits-all regulatory standards with high costs for farms and other businesses (like EPA did in the Chesapeake Bay region). We don't want this!

The other option is for states to develop their own plans that account for their unique landscapes, natural resources, and financial resources, as well as the need to maintain agricultural production.

Iowa is pursuing the latter. Iowa's Nutrient Reduction Strategy was developed by the Iowa Department of Agriculture and Land Stewardship and Department of Natural Resources, using Iowa State University research.

Unlike EPA's rigid approach, Iowa's strategy uses science to determine which voluntary conservation practices work best on Iowa's unique landscapes, an approach supported by policy passed by Farm Bureau members. It identifies practices that have the greatest benefit within targeted watersheds and accounts for the costs of those practices, as well as the need to maintain agricultural productivity.

Farmers know better! Voluntary conservation practices on farms do a lot to improve water quality without calling for more regulation of farms.

Farmers support a science-based state nutrient strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. Esta Raasch

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #122.

Timestamp 12/13/2012 11:17

**Name** Mark Langgin

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                               **Point Source**

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Investment in voluntary incentive programs for nutrient management and soil conservation are incredibly important as we consider solutions to Iowa's water quality issues, investments that can improve agricultural productivity and provide benefits to the public - not just in Iowa, but also to the residents near the Gulf of Mexico. The approaches outlined in the strategy are not radical or new ideas and, in fact, have been under consideration in Iowa since the 1930's. Yet, we have never invested the resources necessary to make a significant impact.

Going into the 2013 Legislative Session, and beyond, Iowans are faced with an incredible opportunity through investing additional sales tax revenue in the constitutionally protected Natural Resources & Outdoor Recreation Trust Fund. Funding the trust fund with a 3/8ths of one percent increase in the state sales tax would provide \$124 million/year for conservation of natural areas that reduce flooding, incentives for soil conservation and resource management, outdoor recreation and wildlife habitat. In fact, over 5 years the Trust Fund would dedicate between \$125-\$150 million towards voluntary agricultural soil conservation programs at the Iowa Department of Agriculture and Land Stewardship.

As we contemplate the rush towards regulation and other options being considered I only ask that we also consider a true investment in soil conservation and use science based approaches towards targeting and evaluating the benefits of voluntary incentive programs. Iowans have a shared responsibility to protect the land and the productivity and economic benefits it provides all of us. This shared responsibility requires a shared approach to funding - and an increase in the state sales tax offers just that responsibility. Public money and public benefits. Clean water, cleaner air, and a better outdoors for future generations.

Sincerely,

Mark Langgin

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**123**.

**Timestamp** 12/13/2012 11:41

**Name** Ron Swanson

**City** Galt

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                               **Point Source**

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I would like to express my support of the Iowa Nutrient Reduction Strategy developed by the coalition of the Iowa Department of Agriculture and Land Stewardship, the Iowa Department of Natural Resources and Iowa State University of Agriculture and Life Sciences. This strategy was developed from a scientific and technology framework and maintains an objective approach to the issues as opposed to a subjective reaction based on emotion.

I appreciate the volunteer method of achieving compliance as opposed to the regulatory route. One only has to look at the European Union for an example of how regulation can hinder the productivity of agriculture. This productivity is going to be needed in the future to meet the nutrient needs of a growing world population.

As a farmer, I have voluntarily implemented a number of conservation programs to reduce nutrient losses during my career including grass waterways, filter strips, reduced tillage, wetland CRP areas, nitrogen and phosphorus nutrient reduction and the closing of agricultural drainage wells.

Hopefully, my example of past conservation stewardship will indicate my desire to voluntarily continue to do my part in what is needed to the reduce the hypoxia area in the Gulf of Mexico and meet the Environmental Protection Agency guidelines without regulation.

Thank you.

Ron Swanson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**124**.

**Timestamp** 12/13/2012 11:57

**Name** Patricia Timmens

**City** Cincinnati

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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When speaking of confinement operations, there is a statement....Stormwater permits are LIKELY to be required. LIKELY is not good enough. These operations are not a good thing for Iowa and I feel strongly that all regulations concerning these CAFOs need to be strengthened. Please please do what you can to protect our water, air and land from these horrible animal factories. Animal welfare should also be taken into consideration. I am hopeful that our government will do all it can to rectify these horrid abuses. Thank you for the opportunity to share my opinion.

Patricia Timmens

ptimmens@hotmail.com



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #125.

Timestamp 12/13/2012 12:07

**Name** Michael Stallman

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Dear Mr Northey:

I support the science based state nutrient strategy which recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

We have used minimum tillage, contour farming, filter strips and wide waterways to protect the creeks that pass through our farm.

Thanks for your service to Iowa,

Michael Stallman Michael Stallman

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #126.

Timestamp 12/13/2012 12:27

**Name** Matthew Schelling

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I support a science based state nutrient strategy. In 2010 , we spent \$100,000 on our 110 cow dairy for manure storage. This combined with a nutrient management plan made it possible last year to grow our crops without any commercial fertilizer. That is a first, in the history of our farm!! We have done many other "small" things to reduce environmental impact at our dairy. In my opinion the EPA is a loose cannon and the less we have from them the better. Matthew Schelling

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #127.

Timestamp 12/13/2012 2:13

**Name** Floyd Walter

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

voluntary compliance for conservation practices have not worked - Do not work! If we expect government subsidies, we should be expected to follow conservation plans to receive them. Floyd Walter

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #128.

Timestamp 12/13/2012 2:47

**Name** Daniel Jensen

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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To me the fact that the government is finally addressing what has been a huge problem for 50 plus years is a good thing, but the words "too little, too late" stick out in my head. Voluntary participation by farmers is the biggest joke I have heard in years. Farmers want to make money, not save the environment(at least most of them) which they have all had a hand in degrading to record lows. That's why you only see a few no-till farms around, ripping the dirt up and allowing it to erode makes more money, and that's what they are after. Nutrients runoff so the farmers put more chemicals on next year. Rinse, repeat. It is that simple. They need to be told what to do or they will not change. provide incentives for no-till, regulate fertilizers (especially Phosphorus) and make it economical or mandatory to have buffers.

The money that Bill Northey has set aside to address this problem is enough to maybe help improve one county in Iowa to reasonable levels of runoff. Nearly every livestock operation in the state needs a good way to handle manure. Eliminate the problem before it happens. It is sad that with today's technology that farmers can't get past putting a bunch of disease ridden polluting manure on fields. Maybe if people knew the immense volume of agricultural byproducts out there people would understand. Millions of tons annually, for decades. It is laughable that the government thinks that this minute amount of cash will improve this astronomical issue. Wake up and at least address the problem for what it is, a huge mess that we have caused and its going to ruin Iowa's land and water. We need a huge effort from everyone if anything worthwhile is going to change.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #129.

Timestamp 12/13/2012 4:06

**Name** Libby Casavant

**City** Iowa City

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I am disappointed that the strategy for nonpoint source reduction does not outline concrete goals or steps that will be taken. Many of the nutrient reduction measures suggested in the science assesment are very effective and need to be used more widely. How will this strategy help insure that actual change is brought about?

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #130.

Timestamp 12/13/2012 4:34

**Name** Brad Crawford

**City** Decorah

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I support the goal of developing a Nutrient Reduction Strategy. However, to be useful to the majority of Iowans, this document should include the diversity of Iowa viewpoints and it appears that Iowa Department of Natural Resources's (DNR) Nonpoint Source Management Program may not have been involved in developing the Nonpoint Source Nutrient Reduction Science Assessment section, based on the Des Moines Register article referenced here: <http://www.desmoinesregister.com/article/20121116/NEWS/311160051/Register-Exclusive-Farm-Bureau-text-in-state-report>

It is important that all of the major players in nonpoint source management play a role in authoring this document, and excluding them is short term thinking that will have long term consequences. I encourage the current authors of the document to carefully consider the value of a document that does not collaborate with all of the major nonpoint source nutrient reduction strategic thinkers in our state, and specifically, the first result for "Iowa nonpoint" in the Google search engine: the Iowa DNR Nonpoint Source Program.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #131.

Timestamp 12/13/2012 5:34

Name Neil Johnson

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Thank you for reading my comments on the subject of nutrient strategy. There should be no real discussion beyond using science-based nutrient strategy. I realize that there are bad 'apples in every barrel', but the vast majority of us that make a living on the farm are truly concerned about this subject. For instance, on my own farm. one 80 acre tract, of which there is 64 acres tillable, every drop of water goes off the tillable land goes through one of the 9 drop inlets or a pond. The timber land does not of course. I care about my land and I aim to keep it on my farm. All of the rest of my farm is just like this one tract I just dicussed. Having someone who doesn't know anything about farm life, should not have any say about this matter!!! Neil Johnson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #132.

Timestamp 12/13/2012 6:11

**Name** Joe Simington

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

As a Farmer it's my goal to take care of the land we use and make it so the land can continue to support the growing population. The up most importance of conservation practices is a priority. On our farm we no till and put on nitrogen in two application so that we cut down on losing products. Forced regulation would kill the farming ind. and take food off peoples' tables. Science-based state nutrient strategy is the best way maintain the great agricultural production that we have in the mid west. Joe Simington



**Name** Mark Keast**City****State****Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

Have you ever had a cap that was "one size fits all" and was disappointed with the fit"

Well, the EPA's one size fits all ground water nutrient guide lines are sure to be a disapointment for most of us involved in farming operations.

Conservation practices are a matter of pride to most farm opperators. For example the grass waterways, field boarders, terraces and native grass filter strips we use on this farm are unique to the landscape, while farms within a mile are river bottom and require practices unique to that landscape.

Who would know better the conservation needs than the men and women that make their living from good stewardship of the land" With the help and scientific support from state and local conservation offices that can be better create a conservation plan for each unique landscape. Mark Keast

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #134.

Timestamp 12/13/2012 7:54

Name Marc Schneider

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

I strongly support a state managed, science-based strategy to economically manage conservation practices. As a farmer we have the most direct and critical interest in maintaining the sustainability of our farm and land that provides for an on-going resource for our own future production and that of our future generations.

We know what works and what doesn't for our situation and are effective in implementing it. Having a person or special interest group sitting thousands of miles away try to pretend to know what may work for us is not feasible. Likewise having a policy forced upon us which does not provide for our on-going economical well-being will create the loss of more family farms and result in large corporations and investment funds managing farm land and they will not take as much interest in protecting the land as the family farmer.

We already practice many conservation practices on our farm such as buffer strips around water sources, strips and buffers on hillsides, split fertilizer applications through-out the growing season, and conservation tillage. Marc Schneider

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #135.

Timestamp 12/13/2012 10:09

Name Ben Albright

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

Thank you for addressing Iowa's water quality issues by creating a nutrient reduction strategy. Water quality should be important to all Iowans.

As a farmer I do my best to manage my land and livestock to protect our water. We use buffer strips, waterways, notill, and just started experimenting with cover crops. Our feedlots all comply with DNR and EPA rules and regulations.

In the future I plan to do more notill and reduced tillage acres and continue to work with cover crops.

I believe the best way to achieve the state's goals are with voluntary programs. Regulations and rules create more problems and only encourage people to do the minimum required. The less the EPA is involved the better. The farmers know their land exponentially better than some EPA employee.

I also believe that any rules that are passed should be science based and site specific. A one size fits all approach will never work. There is too much variation across our state.

I do my best to protect my land and water. I want to leave it in better shape than when I started farming so future generations can enjoy it too.

Thank you again for your diligent work on this important issue. Ben Albright

**Name** D. Wirth**City** woodward**State** Iowa**Providing comment on the following sections:**

<input type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

The State of Iowa has proven that it is substantially incapable of maintaining water quality within its borders. The State of Iowa, with untoward influence from the Republican Governor's Office, the Iowa Farm Bureau, the Iowa State Legislature, Iowa State University's College of Agriculture, commodity groups and multinational interests placed extreme profit over public health, environmental quality and quality of Life for citizens of Iowa. The State of Iowa and its Department of Natural Resources, while gifted with a cadre of talented and dedicated field staff still failed to protect basic constitutionally guaranteed rights including Life, Liberty and the Pursuit of Happiness. These guaranteed rights are impeded by filthy surface waters that can cause disease, chronic and acute health impacts and a degraded quality of life, including stress.

Voluntary compliance has failed. Period. To repeat - voluntary compliance has failed. When profiteers live outside of Iowa's borders and / or presume themselves to be financially secure enough to avoid harm from waters that they are responsible for fouling, then their interest in compliance is minimal or non-existent. The Legislature in Iowa has maintained this free-range attitude and behavior by failing to fully fund the DNR's inspection and enforcement programs, knowing full well that laws "exist" to curtail behaviors leading to water degradation - but without inspections and enforcement through substantive fines or imprisonment, the activities will continue.

Children asked to clean up their dirty rooms will avoid the task if there are no consequences. If Iowa's industrial agriculture players choose to behave like unruly children, it is time for a parental figure in the guise of the EPA, to stop the selfish, decadent behavior. In that regard, I WELCOME the U.S. EPA to oversee the State of Iowa's water quality program until such time that Iowa's waters improve by measurable standards such as: reduction of N and Phos. loading; increase in oxygen levels as eutrophication declines; increased diversity of macro-invertebrates in taxa that are pollution intolerant, an increase in species of mollusks that are currently impaired, threatened or endangered and a significant reduction in bacteria levels in all surface waters where people engage in outdoor recreation activities below levels that pose health risks.

These standards are easy to measure. So far, the state is not managing to maintain these standards, let alone improve degraded waters. The State of Iowa has had decades to attempt to address these issues. Time is of the essence. No more foot dragging. Bring in the EPA.

Since Iowa State is the recipient of these summary comments, please be advised that I am forwarding my copies to outside entities, including my elected representatives and NGOs that are active in these water quality issues.

Respectfully,

D. Wirth

Environmental Horizons

1456 334th Rd.

Woodward, IA 50276

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #137.

Timestamp 12/14/2012 4:30

**Name** Scott Hingtgen

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I support the science-based strategy to nutrient run-off. I feel that alot of us have already started this program years ago by implementing no-till corn/soybean rotations, waterways, covercrops and grid sampling(gps fert application). EPA needs to realize that we can't afford to "dump on" excess fertilizer and chemicals because it is just to costly and that we know it isn't a good practice to do so.Thanks Scott Hingtgen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #138.

Timestamp 12/14/2012 9:36

**Name** Thomas Gifford

**City** Elkader

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I am a whitewater kayaker, paddler and river enthusiast in Northeast Iowa. I am also active in the community of Elkader developing tourism around our Turkey River Recreational Corridor. I spend a lot of my time upside down in Iowa rivers. I also routinely take my children on the river for paddling. It is critical that the state continue to improve water quality for recreational activities.

I wear noseplugs and still get sinus and ear infections periodically from the water. During late summer, I can come up from rolling my kayak and feel my eyes burn and a film of "something" on my skin. These conditions persist whether the water is clean or murky looking.

Rural Iowa does not only depend on agriculture. Small towns, such as Elkader, rely on tourism and the continued enjoyment of our natural resources in Clayton County.

Please consider the impact on recreationists in your plan.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #139.

Timestamp 12/14/2012 9:53

**Name** Richard W. Job

**City** Ankeny

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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I read with considerable interest the article series in the Des Moines Register on Gulf Hypoxia and became incensed at the concluding article that they considered allowing farmers to voluntarily implement the elements of the strategy to be a disgrace(my words from their implication). All the follow-up articles which have been derogatory have made feature headlines while those supporting the Iowa strategy have been buried in their opinion page. I have read the executive summary in detail and reviewed much of the detailed report and I agree with the approach and the conclusions of the report. What is being done to prepare a detailed overview of this strategy to educate the farmers and the general public and I offer my help to prepare it?

I am a retired mechanical engineer who spent most of my career serving the agricultural community with machines designed to meet their needs. I know that the farmers collectively are a very proud group and that they serve not only the US with the lowest cost and best food in the world, but they do it while being good stewards of the earth. If given a chance they will do as much as practical to make this strategy work.

I feel one of the most important elements that must go with this strategy is to educate the farmers and then the general public as to what can be done. I repeat; can I help in the education process by helping to put together a response in the form of an article to be published in, not only the Des Moines Register, but most other large daily newspapers.

I got the link to your website from Reed Christianson, an associate through ASABE, in response to my question as to whom to contact on this.

Richard W. Job

1401 SE Waywin Dr.

Ankeny, IA 50021

Cell: 816-223-5927

Email: rich.w.job@sbcglobal.net

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#140**.

**Timestamp** 12/14/2012 10:24

**Name** Mel Schlachter

**City** Iowa City

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                               **Point Source**

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Friends,

We must do better for our waterways than this "strategy" would do. There is no real strategy for cleaning up the rivers. I see no real incentive for the large polluters--farmers with runoff, animal confinement operations with their honey pits--to change their practices voluntarily. Nor is their substantial accountability involving improved water standards that would come into effect.

People used to swim in the Iowa River without thought of harm. People used to fish there without regard to chemicals or disease that they might be subject to if eating a catch of fish. In our town, most people just see the river as a threat should it flood. How awful a change in our relationship to our river!

The proposed policy continues the practice of benefiting a few at the expense of the citizenry as a whole. Please take it back, take it back. Involve more of us in the writing of it. Have public hearings before promulgation instead of afterwards. Desist from grossly relying on Farm Bureau documents to write proposed public policy.

Many of us in our town care a lot about our river. Please demonstrate a desire for better stewardship at statehouse level.

Sincerely,

The Rev. Mel Schlachter



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #141.

Timestamp 12/14/2012 1:13

**Name** Dale Peterson

**City** Harcourt

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                               **Point Source**

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While I feel it is important to look into the effects of the environment, we need to tread carefully when it comes to the governing over application of nutrients. As a farmer I do all I can to ensure the proper amount of fertilizer applied to the ground where I farm. I am not alone on this, most farmers apply what they need and where they need it. I makes good business to only apply what is needed and not apply in excess from an economic standpoint. I feel with variable rate technology, better equipment, and better knowledge farmers are doing a better job than ever to reduce the effects on the environment. We as a country also need to consider any ramifications of actions taken on the world if a mandate to reduce nutrients would be adopted. Who dies from the lack of food? Not a big deal if your pantry is full. With golbal population set to double in the next decade we need to work on substainable practices already in place that can continue to allow us to feed the world.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #142.

Timestamp 12/14/2012 1:32

**Name** Warren Clausen

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

My home farm in Harrison County officially became a Century Farm this year. Voluntary conservation practices, including terraces, dams, filter strips, and minimum or no tillage have been in place for all of those years, especially the last 50+. We are working with the NRCS to continue and expand those practices in the future. We support Iowa's efforts to encourage voluntary conservation practices rather than have the federal government dictate some "one set of rules fits all" type of approach. We would encourage you to continue in that direction.  
Warren Clausen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #143.

Timestamp 12/14/2012 7:54

**Name** Dave and Ann Donovan

**City** Dubuque

**State** Iowa

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Our water quality must be improved and safeguarded. My husband and I both think we need habitat for ourselves as well as the other living creatures and vegetation that exists in Iowa. Outdoor recreation sites are important to the appreciation of this. We are both very much in support of the Nutrient Management Plan and willing to accept a sales tax increase to fund the agricultural soil conservation programs that are a part of the Natural Resources & Outdoor Recreation Trust Fund.

Nothing could be more important than clean water and a healthy environment. With the changes in climate, it is more important than ever to understand this. And lastly, the drought last summer was frightening and we need all our resources to guard the land that produces the good we eat.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #144.

Timestamp 12/15/2012 8:17

**Name** John Moritz

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Science based nutrient strategy for retaining nutrients on my farm is the best way to proceed. I cannot afford to allow my nutrients to wash downstream in today's economics. I use proven methods to prevent soil loss on my farm. Unnecessary regulations that are counter productive to feeding the world will cause more problems. John Moritz

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #145.

Timestamp 12/15/2012 5:24

**Name** Robert Smith

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

Dear Secretary of Agriculture Bill Northey;

We grain farmers pay large sums of money to apply comercial fertilizer to our crop fields. If we have good and useful informations to how and how much to apply, MOST OF US WILL GLADLY reduce to the level needed for excellent crop production and at year's end that will be hauled off in the grain and not float down the rivers.

The voluntary plans must be good science and deal with top crop production.

Thank you for your consideration.

Robert L Smith, Sr. Robert Smith

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #146.

Timestamp 12/15/2012 5:37

Name Clark Porter

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

Mr. Northey,

I am a farm manager for my family's farm. We grow seed corn, soybeans, hay, and commercial corn. I have also worked as a volunteer water quality monitor for the DNR. I believe a voluntary compliance system for nutrient reduction in Iowa will NOT work. There are too many incentives for farmers to avoid best practices. They may save money by putting down less nitrogen, but they are not likely to take ground out of production for buffer strips. Only strict, mandatory guidelines will level the playing field and assure full compliance. Perhaps it is not necessary to invoke EPA oversight, but a voluntary system will go nowhere. Clark Porter

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #147.

Timestamp 12/15/2012 5:56

**Name** Katy Patterson

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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These are general comments in support of the plan and in support of a sales tax to help fund ag soil conservation programs. I am more than willing to do (and pay) my share to reduce runoff, soil loss, nutrient pollution and water quality degradation!

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #148.

Timestamp 12/15/2012 8:56

**Name** Wayne Humphreys

**City**

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The voluntary practices we have implemented to address nutrient reduction include :

120' buffer strips along stream banks

grass turn rows

constructed wetlands

professionally prepared manure management plans

immediately incorporated liquid manure

side dressed nitrogen

rye cover crop

and extensive terrace construction.

Our goal is to be sustainable with very few purchased fertility inputs and that is only possible if the nutrients applied are appropriate to the crop, the land, and the season.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #149.

Timestamp 12/16/2012 8:20

**Name** John Looney

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I am writing to express my support for a science based nutrient strategy that would allow voluntary conservation practices like buffer strips around creeks and streams and countour farming on highly erodable ground like we use on our farm.

By using these practices on our farm we have greatly reduced soil and nutrient run-off and helped restore the wildlife popultion in our area.  
John Looney

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #150.

Timestamp 12/16/2012 2:00

**Name** Brent Naeve

**City** Humboldt

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I believe the Iowa plan of science based, voluntary plan to reduce nutrient loss will be the most effective. We, as farmers, are very concerned about improving our environment, as it is where we make our living, raise our families, and hope to pass to the next generation. As human, I am more likely, and happier, to do what is voluntary than what is required by law.

**Name** Matthew McAndrew**City** Coralville**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

Iowa Nutrient standards

Public comment

P. 18

The expansion of public awareness and outreach is imperative. This problem is best addressed on urban and rural fronts. Landowners need to understand the immediacy of this endeavor and be given the means to reduce their input whether it be in their backyard or in the field. By involving the entire population, this reduces the chance of finger pointing, rather all are involved to remedy the problem and be involved with the task at hand.

P. 19

All CCAs must be involved. They can act as the guides for those in the field. These are the technicians that can act and direct producers in their actions. All should cooperate with the program and respond to all requests made to them by the program. Only in getting a handle on the supply of nutrients, application and methods used can we best make proper recommendations.

P. 22 of IRS 1 NRSI PDF

It seems to make sense that the numeric criteria range of the EPA is far below the economic and environmental range for the state of Iowa's nonpoint and point sources. Rather, the approach to test the site-specific stressor response for stream nutrient goals is well taken and could be used in a variety of settings and locations. Although this practice may be time consuming and expensive, it may be one of the few means to determine the most realistic results in setting a numeric range. Dissolved oxygen and chlorophyll A and other parameters can act as an indication of stream viability. Further consideration might be given to utilize other biological species.

The technical advisory committee, TAC findings and proceedings should be as transparent as possible. These results could further boost funding and act to further educate the public as to the status of our water quality and further enhance our further development.

P. of NRS2.pdf p. 2 □ 3

It is obvious that research should be on-going. The factors measured are extensive but only with further information will this process succeed. Farmers, CCAs, researchers, townspeople, extension agents and the like should be involved and gather data from the waters of the state under variable conditions.

P 3

Consideration must be made to use riparian forest buffers and grassed filter strips. Research has been done and the results indicate reduction in water quality if buffers are in place. Data should be available from Dr. Isenhardt at ISU.

The data is clear, the results indicate a variety of practices are best positioned to reduce N levels in surface waters. The practices are documented and are available for use to reduce levels of pollutants. These examples appear to be exhaustive and should be available in all watersheds in Iowa. Farmers, IDALS and NRCS should develop farm plans to address the levels of N and P in the waterways. I suggest farmers be given the tools to monitor their own waters to allow them to greater appreciate the value of the land and water (i.e., photosynthesis ---  $\text{CO}_2 + \text{H}_2\text{O} \rightarrow \text{C}_6\text{H}_{12}\text{O}_2 + \text{O}_2$  The importance of water in the process)

**WE CANNOT LIVE WITHOUT CLEAN, FRESH WATER FOR PLANTS AND ANIMALS TO SURVIVE!**

p. 45

After considering the costs involved with a variety of practices, I support the use of buffers in Iowa to provide a living habitat to buffer our waters. Although this land will be lost in production, there lies a final benefit in using prairie as a means of biofuel on a random time base. If we can learn to use these lands wisely for biofuels and protect our most precious resource we may be able to balance the costs and benefits.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #152.

Timestamp 12/16/2012 8:51

**Name** Mike Nyman

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

---

This plan is presented as a reasonable science based approach. It is neither. Linking to the water resource coordinating council takes you to the ag department. The numbers do not add up. Mandatory reduction needs to be implemented on non-point sources to achieve ANY measure if successes. I wonder once this fails miserably in Iowa will the EPA take over and not be bought by the farm bureau?

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #153.

Timestamp 12/16/2012 9:57

Name Skott Gent

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

---

Secretary of Agriculture Northey,

Using a science-based strategy to implement a nutrient reduction plan for the watersheds of Iowa is the right way to go. With technical assistance from the NRCS I have been able to install riparian buffers along my creek, implement controlled-access grazing in the pastures that border the creek, install several surface-water control features on my farms, and construct heavy-use protection practices as well. Programs such as EQIP and CSP have helped fund these projects and provided the incentive I needed to implement them. The water that does leave my farm is cleaner because of them! Skott Gent

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #154.

Timestamp 12/16/2012 10:02

**Name** Bill Hanson

**City** Centerville

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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1. Recommend adding the following practice to Table 1. in the "Cover Crop" Section:

Optimized natural composting cover crop cocktail according to residue carbon content-- winter or early spring planted in front of soybeans. Reference work done by Jay Fuhrer of Bismarck, ND NRCS.

2. Recommend adding the following practices to Table 2. in the noted sections:

A. Tillage: Min-tillage.

B. Erosion control & land use change practices: Optimized natural composting cover crop cocktail according to residue carbon content-- winter or early spring planted in front of soybeans. Reference work done by Jay Fuhrer of Bismarck, ND NRCS.

Thank you in advance for your consideration,

Bill Hanson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #155.

Timestamp 12/16/2012 10:08

**Name** Capt. Michael R. LaValle

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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My comments can be summed up as follows.

The conclusions as presented are simply a whitewash of what is so apparent to anyone who knows how Iowa's waters once were and has gotten in or on them in recent years.

We need real laws with real penalties so all Iowans can have the clean water they deserve.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #156.

Timestamp 12/17/2012 8:49

Name Morey Hill

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I am writing in support of voluntary conservation practices. Anyone who pays attention, knows what is needed to maintain our way of life. Conservation helps my farm be more productive by saving the valuable resources to feed our world. I use buffer strips, grass on HEL land and waterways to help slow water movement and erosion. History has always shown that voluntary involvement will produce better results than forced plans. If I am forced to do something, I will do the bare minium to get by. If I believe in what needs to be accomplished, I will do everything possible to get the maxium benefit. Farmers are weighed down with tremendous regulations! Let us do the best for our livlihood and not add more burdensome bureauacy. I feel the Nutrient Reduction Strategy is a good plan and needs a chance to work. Morey Hill



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**157**.

**Timestamp** 12/17/2012 9:08

**Name** Jeff Cuddeback

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                               **Point Source**

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Secretary of Agriculture Northey,

I am writing you today to express my support for a science-based state nutrient strategy that recognizes the importance of voluntary conservation practices and balances the need to maintain agricultural production. In our farm operation we take full advantage of the riparian buffer strip programs available to us that help to stop the leaching of nutrients and chemicals into our watershed system. Further, where we have erodable soils we have entered certain areas into Federal conservation programs that promote waterway construction and maintenance. Finally, we use conservation tillage practices that serve to limit erosion on land with some grade.

Overall, my concern is that EPA will assert control over this aspect of agricultural production, and, indirectly, my farm operation, which will inevitably lead to bad outcomes. Historically, the EPA is not known for common sense solutions.

I appreciate your time and consideration in this matter. Jeff Cuddeback

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #158.

Timestamp 12/17/2012 10:05

**Name** Barb Schmidt

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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As a state we are not doing enough to clean up our rivers. I urge consideration of reducing the fertilizers statewide that are such a major contributor to the dead zone in the Gulf of Mexico.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #159.

Timestamp 12/17/2012 12:28

**Name** Amy Bouska

**City** Cresco

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Having read the complete study, I am appalled by the proposal to leave all agricultural runoff -- the cause of the vast majority of the problem -- to voluntary action. It is obvious that voluntary action does not work on a statewide basis. In 2010, the people of Iowa clearly indicated that they want to improve the condition of our natural resources, but nothing has been done in response to that.

Why should farmers trying to address runoff issues be put at a financial disadvantage compared to their less civic minded neighbors? Level the financial playing field ... enact requirements and enforce them, as has been done for point-source discharges. The Farm Bureau doesn't represent the people of the state and shouldn't be allowed to dictate policy. And, yes, I own a farm.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #160.

Timestamp 12/17/2012 7:24

**Name** Bryan Mowrer

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I don't believe farmers are against regulations-they are against regulations that are not based on sound science. A lot of farmers in Guthrie County have adapted new ideas and technology that are environmentally friendly. Funding has been a problem for some wanting to improve. I have been able to install some new waterways that has helped control erosion. Those same structures that work for me are not what my father-in-law needs in Boon County. No two farms are the same so keep proposed rules voluntary so we can implement conservation practices where they will do the most good. Bryan Mowrer

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #161.

Timestamp 12/18/2012 3:25

**Name** Steve Kenkel wwtp supt. - city of

**City** harlan

**State** iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Cities that have been proactive in addressing their systems I&I problems - like Harlan has with 80% of their city mains in the past 10 years have been rehab (tved, grouted and lined) with the final phase set to be completed this next fiscal year and the installtion of a equlization basin to help keep dry and wet weather flows well below plant design ,should not be pentalized for their efforts, and thrown in as a major (with flows greater than 1mgd.)When we may never reach 1 mgd.I would hope you would look at this on a case by case bases. Our flows for 2012 rarely exceeded .5 mgd. Thanks for your consideration on this matter.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #162.

Timestamp 12/18/2012 5:56

**Name** Denis Heatherington

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would like to express my support for a science-based state nutrient strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. We have many acres in the CRP program and in buffer strips. I'm sure farmers like myself will do what ever it takes to make sure the good soil and the chemicals we use stay in place. Denis Heatherington

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #163.

Timestamp 12/19/2012 1:34

**Name** Chad Means

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would encourage doing science-based state nutrient strategies that use voluntary conservation practices. We use terraces, grass head lands, and grassy waterways to reduce soil erosion. I again encourage local control because the people know the ground better than someone in D.C. Chad Means

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #164.

Timestamp 12/19/2012 3:57

**Name** Allan Kluever

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**  **Nonpoint Source**  
 **Policy**  **Point Source**

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Secretary of Agriculture Northey,

Conservation practices such as grassed waterways and filter strips do work to keep soil and nutrients on the field instead of entering streams and rivers. They also provide cover for wildlife. I have used these practices along with no-till and find productivity remained the same or has increased. Leaving residue on the field to slow the runoff is something every farmer could do. Allan Kluever



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #165.

Timestamp 12/19/2012 4:58

**Name** Dennis Booth

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support a science based state nutrient strategy that recognizes the conservation practices and the need to maintain agricultural production. Presently I have buffer strips next to the dredge ditch which I feel is very important. This I feel has benefited the water quality. Thank you for your time.

Dennis Booth Dennis Booth

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #166.

Timestamp 12/19/2012 6:01

**Name** Eugene Kenkel

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Secretary of Agriculture Bill Northey.

I have been no tilling for twenty years, installed buffer strips, and terraces. All of which is voluntary and based on science. I believe that is the way it should be. I am a small farmer.

Gene Kenkel

Panama Ia. Eugene Kenkel

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #167.

Timestamp 12/19/2012 6:38

**Name** Marvin Lundstedt

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

The voluntary approach is definitely to best for Iowa. Iowa farmers have a good track record for accepting and adopting voluntary conservation practices on their farms. Marvin Lundstedt

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #168.

Timestamp 12/19/2012 7:02

**Name** Steve Kurth

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Support Farm Bureau's suggested plan. Steve Kurth

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #169.

Timestamp 12/19/2012 7:14

**Name** Mark Williams

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

Hey Bill, we've done a few things on our farm to limit runoff of chemicals and fertilizer. Filter strips, strip till corn planting, grass waterways and trying to be good land stewards.

It's imperative we protect our water voluntarily, we don't need anymore regulations. We need big yields to meet expenses, but moderate conservation practices where everyone shares the load will get the job done.

Thanks Mark Mark Williams

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #170.

Timestamp 12/19/2012 7:48

**Name** larry lampe

**City** hillsboro

**State** iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I look around my part of the state[southeast ia.] and the vast majority of the farms practise very good consevation practises. Sure we have a few deadbeats, so do the urban population. I just finished my 87th terrace on 500 acres, and have 15 more planned, about half done at my own exspence, no gov. help. Many of my neighbors have built numerous terraces. Much more can be done, but the progress has been very impressive. I feel the report by the register was unfair, done without any reserch regarding farmer acomplishments.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #171.

Timestamp 12/19/2012 9:30

**Name** Deborah Fink

**City** Ames

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Attending the 19 December public informational meeting at ISU, I was impressed with the scientific assessments, even though there is still much to be done. I was not impressed with the IDALS presentation on implementing the measures necessary to effect the desired reductions. In fact, the presenter began with what could only be an argument against the required reductions -- that Iowa is such an important food producer, it should probably get a break in nutrient pollution of waters. Then he moved to saying that it would cost big bucks that are not there. Therefore, we should seek market-based, voluntary compliance. What is the probability that this will work? And what are the measures involved? Those are questions that haven't been researched.

I heard nothing to indicate that the IDALS is serious about nutrient reduction into our waters. Or that Iowans are prepared to make the required changes and face the costs of reducing nutrient runoffs. This stinks.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #172.

Timestamp 12/19/2012 9:43

**Name** John Geake

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I'm appalled that the FB continues to support voluntary conservation practices. Our farm in Sac County Iowa is a leader in reducing erosion and protecting our water.

Farmers need a wake up call to pay attention or lose their options for N rate, crop ins, and tillage practices.

Have Bill contact me to help him in this area. John Geake



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #173.

Timestamp 12/19/2012 9:44

**Name** Adam J. Hill

**City** Ellsworth

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**  **Nonpoint Source**  
 **Policy**  **Point Source**

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As a cooperative board member and a farmer, I'm concerned about the ability to apply NH3 in the fall rather than spring. Spring often brings with it large amounts of rain, which keeps farmers out of the field. As farmers we are asked to buy our NH3 early, so we have a need to get it on when the field conditions allow us. Our operation always uses a nitrogen inhibitor with our fall applications of NH3, as we want to utilize all the nitrogen we purchase. Nitrogen inhibitors are catching on with farmers for economic reasons, we don't need more regulations to increase their usage. Thank you

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #174.

Timestamp 12/19/2012 10:55

**Name** Earnest Kopaska

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

We need to keep encouraging NoTill. Farmers around us have gone back to tillage since the weather has been so favorable and I suppose they think they can capture whatever moisture is available. Earnest Kopaska

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #175.

Timestamp 12/20/2012 11:26

**Name** Virginia Soelberg

**City** Johnston

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Policy**

**Nonpoint Source**

**Point Source**

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I am commenting on the short time I have to prepare comments. There is a lot to read. I attended the Water Resources Coordinating Council meeting but that just raised more questions needing answers and issues for me to more fully understand.

Please extend the comment deadline. Between now and January 4 I have a blizzard to shovel out of, trips the the airport to pick up my son and daughter and their families, Christmas preparations not yet completed, holiday travel...the list goes on. Making comments is on my list, but it keeps getting moved to "tomorrow."

Citizen input should be important to you and the process. We all want cleaner water for drinking, recreation, and for those downstream from us. Give us more time to comment.

Thank you.

Virginia Soelberg

ps You didn't have a section to comment on timing for citizen input, so I had to check one.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #176.

Timestamp 12/20/2012 11:27

**Name** Fred Abels

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Please let our farmers decide their own rates of fertilizer application. As I'm sure economics will eventually decide rates of fertilizer application. Being a farmer yourself Mr. Northey you know this already. Fred D Abels

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #177.

Timestamp 12/20/2012 12:02

**Name** Randal Balderston

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Mr Bill Northy, Sec of Ag.

I am so appreciative of the cooperative efforts of the dept of ag, dept of natural resources and Iowa State University to colaberate on a plan that is science based. Iowa farmers have worked for years to show good stewardship on their farms. In our own farming operation we have installed thousands of feet of tile, built endless feet of waterways(we bale nearly 40 acres of hay from the large ones), and have reduced our tillage. My son and I are always looking for more effective nutrient management ideas. Just recently we reworked our liquid manure spreader to put better injection applicators in place. We are making plans for more sidressing of nutrients. Working together we can all make a difference without all the beaurcratic red tape and ineffective heavy hand of beltway politics

Thank you all for your vision as the first in the nation in developing a voluntary plan of action. I know that I speak for many in looking foward to working on this problem in the direction that your research has pointed us. Hopefully we can keep emotion out of the equation and make changes we can all live with. sincerely, Randy Balderston & Aaron Balderston. Randal Balderston

**Name** William and Connie Doudy**City** Mt Ayr**State** Iowa**Providing comment on the following sections:**

<input type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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We would like to comment on hog confinements. We feel there should be better management of them. The waterers should be monitored for leakage and fixed more often than what they are now. The leaking waterers cause the pits to fill up faster making application of the manure on a untimely schedule for the crews who pump the pits. There also should be better regulation of the trash that is discarded in the pits. The syringes, sow tubes, rubber gloves, boards, insulation, and even dead hogs that get discarded in the pits make it hard for the crew pumping the pit as the hoses plug. They have to be unplugged and it is usually done on the ground next to the confinement rather than the fields. The trash could easily be disposed of properly but things are lax requiring the confinements to do so.

We have many Amish farmers living in our area. We are concerned that they are not required to follow a nutrient management plan for the dairys they operatate. What about septic systems for their homes? Every citizen and operation, no matter how small or large should have to comply with the rules and regulations to ensure we have a cleaner earth. Thanks for listening. We try to do our part.

Bill and Connie

**Name** Dennis Friest**City** Radcliffe**State** Iowa**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

I raise corn and soybeans and farrow to finish hogs on my farm operation. On my farm I utilize all of the manure from the hog operation in a way to maximize the nutrient value from the manure. I utilize GPS to measure the soil needs for nutrients on a 4 year cycle with soil testing. I utilize GPS technology to measure the nutrient value in the plants with stalk nitrate tests. With all this technology I am able to better manage usage and needs of crops produced on a field by field basis. I am able to utilize nutrients with existing fertility, organic matter, soil types, and ph to make the best decisions on nutrient utilization.

I have replicated manure and nitrogen usage in strips across fields for 10 years with the help of ISA's On Farm Network and EQIP projects with NRCS. I have developed a vast amount of data that helps me manage nutrient usage with the best management practices possible. The main variable that causes the most problems is the rainfall events in the spring and summer that can greatly influence nitrogen loss. That can vary from field to field and even soil type to soil type. It is very clear to me that I need to adapt every year to make changes in timing, placement and amounts of Nitrogen to maximize my profits and yields on my acres. Any regulatory mandates would be very ineffective and prevent one from making the best management decisions.

In my operation I utilize grass waterways, conservation wetlands and tillage practices to manage soil and nutrients as needed to efficiently and economically produce my corn and soybeans. What I do works in very well with the needs of the nutrient reduction plan.

What farmers need to become involved in these management practices is financial support in the form of helping collect and analyse the data to be aware of management decisions to help improve the environment. Many farmers have the GPS tools to measure and apply nutrients at rates to better utilize the inputs they use. Education and helping develop these practices are needed for many farmers. There are financial costs to do this and resources to help farmers do what is needed.

I myself have benefited from working with true environmental groups such as Environmental Defense Fund and Nature Conservancy that truly are willing to work with farmers to make improvements that are practical and can work without burdening production farmers with regulatory processes that can be very counter productive. We as famers can bring the practical experience to the solution to making a better environment for everyone through the Nutrient Reduction Strategy that is now being proposed.

Dennis Friest

Radcliffe, IA

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #180.

Timestamp 12/20/2012 11:13

Name Bryan Sievers

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

The adoption of a nutrient strategy for Iowa that is based on voluntary conservation practices, led by local initiatives, and incentives from the public sector will insure continued improvement in the quality of our air, land, and water. A number of examples of the success of this approach can be found on our farm. Currently, our family-owned feedlot is in the process of constructing an anaerobic digester to manage the nutrients from our beef cattle feedlot, destroy pathogens, and virtually eliminate odor issues associated with livestock production. This voluntary effort is being accomplished through federal and state government incentives accomplished through a state regulatory authority (Iowa Department of Natural Resources). As a result our air and water quality will be better and quality of life improved on our farm and in rural Scott County, Iowa.

Please continue to support this voluntary, incentive-based, and locally led approach that will provide benefits to family farms now and in the future. Bryan Sievers



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #181.

Timestamp 12/21/2012 8:52

**Name** R Ted Payseur  
**City** West Des Moines  
**State** Iowa

**Providing comment on the following sections:**

Executive Summary       Nonpoint Source  
 Policy                               Point Source

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The strategy must be driven by available funds local, state & a large commitment of federal funds. Our nation's history is loaded with examples of local pollution problems being funded by federal tax dollars: Chesapeake Bay, the Great Lakes, Florida Everglades & Long Island Sound. The Federal government also springs to the aid of states because of natural disasters such as: Hurricane Irene & now \$40-60 billion dollars is being considered to rebuild the Jersey Shore damaged by Super Storm Sandy. Finally, our nation has taken on projects of national importance (crossing state lines) such as: railroads, interstate highways, locks & dams (TVA etc.) & providing power to rural areas. The hypoxia in the gulf seems to be blamed on a handful of ag. states. The gulf coast shrimp industry is held out as a driver to correct the nutrient problem. This \$600 million dollar industry can be replaced short term by raising shrimp in on shore lagoons. The multi billion dollar grain & live stock midwest farm industry needs land based farming to survive & continue to feed the US & the world. I believe that a sound food supply is a national issue & should be funded accordingly. The 23 states that make up the Mississippi basin, which accounts for 42% of the lower 48 state land mass needs help in order to take on the national problem of nutrient reduction. These states congressional representatives need to demand federal funding. Finally, tests have indicated that as much as 70-80% of phosphorus comes from stream & river banks & beds.

The CWA act & the Corps authority is based on regulating the waters of the US. The Federal contribution to solving nutrient removal needs to be significant.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #182.

Timestamp 12/21/2012 9:04

**Name** Kevin Sutcliffe

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

On our farm we have created grass waterways. We keep them mowed twice a year. Maintain the edges by grading when needed to let the water into the grass area. By doing this we have reduced soil erosion problems on several different farms. These grass areas we have could be used for crop production but we choose to conserve the soil. We also have ground in CRP and plan to continue the same practices in the future.

I support Science-based state nutrient strategy that recognizes the importance of voluntary conservation practices and the need to maintain agriculture production. Kevin Sutcliffe

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #183.

Timestamp 12/21/2012 1:14

**Name** David Dechant

**City** Cedar Rapids

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**  **Nonpoint Source**  
 **Policy**  **Point Source**

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Needs to provide added emphasis on local (Iowa) water quality needs and benefits and less on Gulf Hypoxic water quality needs and benefits. More likely to get local buy in and commitment if the needs/benefits are here.

Needs to include more discussion of anticipated benefits locally (Iowa), ie reduced algal blooms and enhanced aesthetic and recreational use of lakes, reduced nitrate concentrations in water supplies, additional wildlife habitat, etc. More likely to get local buy in and commitment if the benefits are more defined/tangible.

Personal preference is to see the strategy presented as 45% overall reduction through

- a) 67% N and 75% P reduction from point sources contributing an estimated 8% of N load and 20% of P load
- b) 41% N and 29% P reduction from nonpoint sources contributing an estimated 92% of N load and 80% of estimated P load.

The reason for this personal preference is that it paints a picture of reasonableness for the nonpoint sources, whose reductions will be voluntary. ie that nonpoint sources are being asked to achieve less reduction even though the vast majority of the N and P loads are from nonpoint sources.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #184.

Timestamp 12/21/2012 3:22

**Name** Terry Tikovitsch

**City** Iowa Falls

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I live on the Iowa River. I can see there are still Big Issue with water quality on this river and others around the state. For the Iowa River, I can see poor water quality year-round! The idea of ONLY voluntary compliance with nonpoint source nutrient reduction is just NOT good science nor working towards better water quality for Iowans.

I am Strongly suggesting that you please consider changing this to insure better water quality standards for All Iowans.

After reading through the materials it seems to be slanted to favor agri-business at the expense of all Iowans who need good water. This is a mistake that is impacting us now and will only get worse.

Iowans can do better! I hope you'll take a more proactive stance for better water quality.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #185.

Timestamp 12/21/2012 4:15

**Name** Cara Matteson

**City** Manchester

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I am very excited that Iowa is moving forward in safeguarding their water! In reviewing the 'Nutrient Reduction Strategy' document I had the following comments:

There didn't appear to be any set deadlines by EPA to comply with the 45% nutrient reduction. Is this going to be better defined in the future? What happens if Iowa doesn't meet EPA's reduction request?

It's nice to see some water quality goals for nutrients in surface water but it appears that the numeric nutrient criteria may be unattainable for Iowa. 10mg/L for nitrate as N is the MCL for drinking water; 3mg/L of total nitrogen in surface water would be fantastic but would be almost nutrient concentrations in an ecosystem without anthropogenic water quality degradation.

This nutrient reduction strategy has stemmed from the hypoxia zone in the Gulf but we are also having our own nutrient problems here in the state of Iowa that need to be further addressed. Groundwater is a resource that is continually polluted with nutrients and creating more and more problems with increased nitrate levels in public drinking water supplies. It would be nice to have a reduction goal for the groundwater as well. Could the water quality goals for nutrients be used for groundwater? Why should public water supplies (and taxpayers) have to pay to clean up the groundwater?

Voluntary conservation measures for agriculture may be a start but is not realistic if we want to see some real changes. Iowa needs to start thinking how agriculture can realistically be regulated. Agriculture MUST be regulated. Agriculture is a business and other businesses are penalized if they pollute, why should agriculture be exempt?? It's about time we hold agriculture to the same standards as everyone else.

I wouldn't even call a lot of the conservation measures "voluntary" because landowners/operators are getting paid (through cost share measures) to do best management practices.

As a taxpayer I no longer want to pay the agriculture industry to do the right thing and then label it as "voluntary" when they are getting paid.

Regulation is very heavy on the municipalities for the point source of wastewater. Why should the cities have to pay for treating the nutrients to a cleaner level than what came in upstream??? It seems they are a very easy target.

I am anxious to see how EPA follows through with their nutrient strategy and hope agriculture will stop polluting Iowa's water-rich environment.

Cara Matteson

Environmentalist & Geologist

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #186.

Timestamp 12/21/2012 4:38

**Name** Robert Mortenson

**City** Elk Horn

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The application of excess nutrients to farm ground not only pollutes water supplies, but is a waste of the farmer's money for that unneeded excess. Which raises their cost of production and food prices as a whole. However, having said that, many are still not going to take action unless it is mandatory.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #187.

Timestamp 12/21/2012 4:42

**Name** Cody Christianson

**City** Ames

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Sustainable development needs to be of utmost important regardless of cost. It not only affects lowans health and safety, but reduced and pollutes the very fish we eat From the Gulf of Mexico. We must do our part to reduce these pollutants while continuing to increase food production. I request you mandate the reduction of runoff rather than have a voluntary program. We need tough standards if we are going to continue living on a finite planet. The danger of the Gulf turning into the Black Sea is highly probably. We must do all we can to reduce this waste. It is not only a waste of resources but a waste of health. Thanks for hearing my input and I hope you strengthen and require these standards.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #188.

Timestamp 12/21/2012 5:06

**Name** Roger Schlitter

**City** Mason City

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I am a landowner and grew up on a farm where contour farming with buffer strips was the practice my father followed to control erosion. We were among the first in our area to abandon the moldboard plow. I have spent thousands of dollars to build terraces, require my tenant to maintain contour lines and utilize minimum or no till practices.

I believe I am the exception, especially for a landlord. I believe we need to set limits on soil loss and require soil conservation practices. If voluntary compliance worked, we would not have a problem in the Gulf of Mexico and I would not see county road crews dredging out road ditches to remove soil which has washed off of adjoining farms. Soil is the most precious resource we have in this country. To lose it and the nutrients that go with it is a travesty and has long term impacts on our ability to produce food at a reasonable cost.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #189.

Timestamp 12/21/2012 5:21

**Name** Dennis & Linda Senecaut

**City** Altoona

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Policy

Nonpoint Source

Point Source

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It's time to stop coddling Iowa farmers and make them take responsibility for the water they are polluting from Iowa's lakes and streams to the Gulf of Mexico. We could not take our grand kids to Big Creek beach last summer because of the high nitrate levels in the lake, and that was not the first time. We have the largest nitrate filtration plant in the world at the Des Moines water works. Voluntary measures are not working. We need regulations with teeth.

Water is a precious resource and we must treat it as a precious resource. Stop the runoff from farm fields. There is much we can do. Stop kicking the can down the road.

Thankyou.

Dennis and Linda Senecaut

Altoona, Ia.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #190.

Timestamp 12/21/2012 6:14

**Name** Miriam A Timmer-Hackert

**City** Coralville

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The Iowa Department of Natural Resources has 54 pages of comment on the first twenty pages. To summarize: this document seems to be written by a small group of farmers and does not reflect the interests of the rest of lowans and the rest of the country.

Strategic plans should include strategies.

We should take better care of our environment or our children are going to live in pig crap and dead zones. No wonder young people are moving out of Iowa.

Miriam

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #191.

Timestamp 12/21/2012 6:52

**Name** Paul MacKendrick

**City** Runnells

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I believe Iowa's nutrient strategy will work to achieve the targeted load reductions through voluntary practices that allow farmers freedom to develop customized solutions that fit the individual needs of their farm and farm ground, thus avoiding expensive and often ineffective mandatory regulations.

Some of the practices that are in place today and will continue to grow are the utilization of precision agriculture including grid soil sampling and Variable Rate Applications.

Continuing to work with CCA agronomists to develop and implement nutrient management plans.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #192.

Timestamp 12/21/2012 7:41

**Name** Jane Kauzlarich

**City** Arnolds Park

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Policy

Nonpoint Source

Point Source

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I am a life-long Iowan, and I love our state. However, our run-off of pollutants is a major contributor to the "Dead Zone" in the Gulf of Mexico. In addition, the quality of water in our state is dismal, to put it mildly. Voluntary compliance to curb this disturbing trend will NOT work. VERY few people voluntarily do anything that might cost them money or time, regardless of the long-term benefits for the planet as a whole. Nope. We need stiff regulations, enforcement, and fines. "Money talks."

We are poisoning our waters...endangering future generations; and, sadly, we are passing this pollution right down the Mississippi River. Iowans should be ashamed. I know I am. Do something substantial! Stop this degradation! Voluntary compliance is a disgusting joke.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #193.

Timestamp 12/21/2012 8:31

**Name** Dale Patrick

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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You can do better than this.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #194.

Timestamp 12/21/2012 8:56

**Name** Elen Fisher  
**City** Cedar Rapids  
**State** Iowa

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Voluntary conservation strategies are utterly toothless and serve only for 'greenwashing'. Iowa has already demonstrated that they aren't effective. We need regulations with significant penalties for non-compliance - penalties costly enough to change the behavior of landowners responsible for nonpoint source pollution.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #195.

Timestamp 12/21/2012 9:11

**Name** Terry Lowman

**City** Ames

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Our farm is on the Des Moines River, which is nothing more than an open sewer for farm runoff. We stopped eating the fish 20 years ago... really disappointing for a family that loves to fish.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #196.

Timestamp 12/21/2012 9:15

**Name** Sheila Tran

**City** Hartley

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I live in Hartley, Iowa. I am concerned about our environment. It doesn't surprise me one bit that Iowa is polluting our precious water resources. But I think the farmers are polluting more than you think. I can't tell you how horrible it smells here in Iowa with all the farmers putting what they call "liquid gold" which is liquid pig poop all over in their fields. I am really embarrassed when my family members from out of state come and visit me and they tell me how horrible it smells here in Iowa. Can't there be something done about that also? I used to live in Oklahoma, Texas and Minnesota and they don't use that pig poop on their fields. Can someone please stop the farmers from doing that? I know that can't be a good thing to the drinking water in this state. I hope to get some answers from somebody about this matter also.

Sheila Tran



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #197.

Timestamp 12/21/2012 9:43

**Name** Mary Kirkpatrick

**City** Iowa City

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I believe that Iowa should take comprehensive steps to reduce the overfertilization and pollution that is put into our soil and rivers. It is unacceptable to send our waste to the Gulf of Mexico and create/expand the dead zone.

I am deeply concerned about the process that has been developed to date. There need to be widespread opportunities for people to voice their input and commitment to cleaning up our rivers and land.

Thank you,

Mary Kirkpatrick

Iowa City

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #198.

Timestamp 12/21/2012 9:49

**Name** Ann Vorhees

**City** pleasant hill

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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We are working so hard on keeping the water and land clean of toxins. I can't live with myself thinking that I'm allowing possible contamination of drinking water and children drinking it. I may as well be giving them that glass and telling them that I'm killing them. It's not right. There are other ways to farm without these chemicals. We really need to start talking about verticle farming to provide fresh produce and food to the Midwest as well as creating jobs. Also, why are we still giving money to the United Nations for starving African countries? Build vertical farms with the money we give to the UN, grow food, 365 days a year, here in Iowa, can it or process it and ship it over to the countries. Jobs for everyone and money going back into our economy via taxes, as well as doing our good deeds for the world.

<http://thewatchtowersearch.blogspot.com/2012/05/future-of-farming-vertical-farm.html>

Save the farmland for corn and soybeans as grain and fuel sources, but we need to consider building more algae plants for fuel since these can be build on unproductive farmland, such as flood plaines.

Thank you for your time.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #199.

Timestamp 12/22/2012 1:00

**Name** Jim Vorland

**City** Preston

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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The pollution policies of the state of Iowa should not be written or heavily influenced by the Farm Bureau or other groups that have a vested interest in polluting. They should be science based and protect the Gulf of Mexico.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #200.

Timestamp 12/22/2012 5:03

**Name** Pamela King

**City** Carroll, IA 51401

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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This is outrageous this behavior that continues with the ones that have our planet in your hands. It's time to think about all of us instead of just a few who have the money. Wake up.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #201.

Timestamp 12/22/2012 7:54

**Name** Mick Ketchum

**City** Wallingford

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The Iowa Nutrient Reduction Strategy offered is completely unacceptable. Iowa lakes and rivers are not only among the polluted in the nation; they are among the most polluted ON THE PLANET. "Google" it to verify! Your response is practically no solution to pollution.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#202**.

**Timestamp** 12/22/2012 9:03

**Name** Kathryn Forsythe

**City** Iowa City

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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The NPS part of the report clearly reflects agri business point of view of doing nothing. As a country we require all other major business to stop any polluting of our water way, why should farming be allowed to pollute at will. I know plenty of small farmers shower trying their best to stop run off from there farms, why should huge industrial farms be to destroy our water. We all eat sea food flown in from the Gulf, we all like to vacation is cities and towns that reside on the Gulf, do we really want a dead body of water to look at, I don't think we do. My husband and I vacation on the Gulf every year, we've watched the gulf becoming less diverse. As a native Iowa girl, who loved staying at her grandparents farm, please let a group not in bed with the farm bureau rewrite the NPS section of this report.

Sincerely,

Kathryn Forsythe

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #203.

Timestamp 12/22/2012 9:10

**Name** Kerry Heilskov

**City** North Liberty

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Iowans deserve better than a status quo strategy for contributing to the dead zone in the Gulf of Mexico. To IDALS, DNR and ISU: this strategy is unacceptable. Please go back and do it the right way.

Thank you.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #204.

Timestamp 12/22/2012 9:23

**Name** Kriss Wells

**City** Le Claire

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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While there are many polluters who want to do the right thing. They cannot do this without leadership. And there are many polluters who do not think that we have a problem. It is critical to set high mandatory standards in order to accomplish the necessary ecological goals. History has proven that you can regulate pollution if you set standards and require compliance.

It is wrong to keep sending our waste down-river.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #205.

Timestamp 12/22/2012 9:44

**Name** douglas deaett  
**City** Hanover  
**State** New Hampshire

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Dear Sir

All states along the Mississippi should assume responsibility for protecting the most important river in America. Keeping nitrogen out of the water by using modern farming techniques, and limiting the use of nitrogen fertilizers is one method. Please do all you can to bring back life to the "dead zone" at the mouth of the Mississippi.

Thank you,

Douglas Deaett

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #206.

Timestamp 12/22/2012 12:15

**Name** Eliana Parnas

**City** Iowa City

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The so-called "strategy" that has been proposed to decrease the amounts of nitrogen and phosphorus in Iowa's waterways is a lazy and insufficient excuse of a plan. It insults Iowans concerned about the environment and serves as an embarrassment to the institutions which authored it. Please do what is best for our state, our nation, and our planet by re-approaching this issue with the seriousness it deserves.

**Name** Dennis Pate**City** Urbandale**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

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It is true that the voluntary approach (with a good deal of support in terms of cost-share and technical assistance that was publicly funded) has worked to a degree. However, it is time for regulation to "encourage" those who are not volunteering.

The regulation can be flexible to account for the Farm Bureau concern of allowing for "situations specific to the particular land and farming operation". This flexibility is provided by a regulation which requires all to develop and apply a conservation plan--it can be specific to soil erosion control and nutrient application if wanted. The regulation should also require random third party audits to assure that plans are being followed and that records are being kept.

Such an approach should not be feared by those already doing good voluntary work as they would be proven to be doing this good work. The approach gets at concerns relative to "accounting for differences in terrain and farming operations", and would generally require further effort only by those not currently doing what is needed for environmental protection through the voluntary approach.

By the way, the solution to implementation of such a rule is not just more government employees. Government and private sector conservationists could cooperate on plan development and implementation requirements, and private sector auditing firms could be deployed for the impartial third party audits.

It is time for Farm Groups to quit being on defense, and move forth with an offense that proves that those members doing good voluntary work are, in fact, doing such work; and that affords an avenue for those not currently doing such good work voluntarily to forge ahead with a plan specific to their land and farming operation.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**208**.  
Timestamp 12/22/2012 12:51

**Name** D. J. Davis

**City** Cedar Falls

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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May I suggest that if there were a financial incentive for doing some very effective non-point practices (going to perennial switch grass for energy crops, for example; or help with switching to high-return organic farming), this could be a successful alternative?

Thank you for your work.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #209.

Timestamp 12/22/2012 1:42

**Name** Jacquelyn M. Meyer

**City** Waterloo

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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As a proud Iowan who values our environment I strongly feel that Iowa must do its part - so that we are not contributing to the "dead zone" in the Gulf. Come on People - make a difference - do the right thing. We must value our earth - we are the caretakers. Iowans are intelligent and should know better. Devise a strategy that takes care of all living things - fauna, water, and ultimately people.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #210.

Timestamp 12/22/2012 2:14

**Name** christine mewhirter

**City** clinton

**State** iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Its obvious to all that our farming and lawncare practices are ruining the planet. Growing gmo corn, applying copious amounts of chemicals, and then feeding it all to cattle so that we can eat too much meat and get heart disease. Its a ridiculous chain of events that ruins the health of the planet and of course our health too. All subsidized by our taxes. REALLY?? The answer seems radical but is makes so much sense. Less beef, pork, chicken. more veggies. Grown organically. Healthy planet. Healthy people.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #211.

Timestamp 12/22/2012 2:14

**Name** Nancy & Dale Hanaman

**City** Rippey

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Dear People,

We are deeply concerned tat the Nutrient Reduction Strategy does not adequately address the need for legal requirements to deal with the contamination and pollution from agricultural sources. Voluntary compliance is not enough. Critical revisions are needed so that a common sense approach is developed to reduce agricultural chemical in our waterways. This is important to all who live and work in Iowa in rural and urban area.

Dale and Nancy Hanaman

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #212.

Timestamp 12/22/2012 2:21

**Name** Kim Wemer

**City** Grinnell

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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No transparency. Please pay attention to the DNR comments, not Iowa Farm Bureau!



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #213.

Timestamp 12/22/2012 4:29

**Name** Martin James Monroe

**City** Battle Creek

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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No "Public" Policy should be implemented without the "public" participation of all States' involved! There should always be several opportunities for public disclosure of all facts and considerations. The Public has a constitutional right to voice their concerns and own proposals, as well as, reject the proposals of government officials who are accountable to the public, since Public Policy is for the Public's benefit, and the ultimate oversight is their right.

It is in my opinion, that this Nutrient Reduction Strategy policy proposal lacks public consensus and should not proceed further without the Public's full knowledge and consent.

Bureaucrats are appointed not elected, and have no right, nor do they have any business formulating public policy from behind closed doors and out of the sight of the public. It is Public Dialogue that should formulate public policy.

I am,

Martin James Monroe

Congressional District 4

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**214**.  
Timestamp 12/22/2012 7:39

**Name** Gretel Winterwod

**City** Dubuque

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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There was insufficient input from the environmental community compared to that provided by the Iowa Farm Bureau. If municipal waste water treatment systems are required to reduce nutrient discharges, which I believe they should, then Iowa farmers should be required (not voluntary) to reduce their nutrient load, particularly in highly affected watersheds.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #215.

Timestamp 12/22/2012 7:42

**Name** patti holmlund

**City** harlan

**State** iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Let's try something new; doing what is best for the health of Iowa's water, land, and people. Quit being "puppets" ( could think of a much better word here) of farmers/CAFOs and get serious! The technology is out there, but if you think the polluters will voluntarily do anything that will cut into their profits, you are delusional.

**Name** Robert Rabinoff**City** Fairfield**State** Iowa**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input checked="" type="checkbox"/>	<b>Point Source</b>

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This is a general comment. I grew up in New York City. NYC had and has many problems, but clean water is not one of them. We were always able to drink the water straight from the tap; it came from a clear, clean mountain aquifer north of the city. Imagine my surprise when I moved to Iowa and found out the hard way that the city water was disgustingly foul from the farm chemicals that were poured onto the soil, and the water treatment chemicals that were poured into the water to make it minimally potable. I had to spend several hundred dollars to put in a water filtration system on my tap in order to have water to cook with and to drink. The alternative is to lug gallons jugs of bottled water at 35¢/gallon from the grocery store. In effect, I have to pay an extra tax to subsidize farmers who are polluting my water, not to mention polluting my food.

I understand that crop yields and prices are at record levels, as are land prices, and farmers absolutely must keep up the production or they will go out of business. That does not mitigate the damage that is being done to the local environment, and, as we know, the remote environment as well -- a decision taken by a farmer here in Jefferson Co. will impact the ecosystem in the Gulf of Mexico, and, incidentally, the livelihoods of those along the Gulf Coast who derive their income from the fisheries there.

The DNR etc. should be pointing out these connections and working to influence state policy towards a more sustainable system of agriculture, including perhaps subsidizing farmers when they transition from the current chemical/GMO-driven monoculture to a diversified, organic practice. In any event, the DNR, which is supposed to be working to preserve the environment we all have to share, should not be pandering to the vested interests in the state as represented by the current administration.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #217.

Timestamp 12/23/2012 1:23

**Name** Mary Gardner

**City** Evansdale

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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We must start over and come up with a better plan than this to stop the problem of contributing to the dead zone.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #218.

Timestamp 12/23/2012 6:28

**Name** Judy Porter

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Iowans deserve better than a status quo strategy for contributing to the dead zone in the Gulf of Mexico. Let's get serious and get tough -- time to do something that will make a significant difference. Water is our most VALUABLE resource. Iowa's got the integrity and will power -- put it to work to make a difference! Thank you for your consideration on this matter. Judy Porter

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #219.

Timestamp 12/23/2012 9:25

**Name** Scott Ransom

**City** Cedar Rapids

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Although I understand the desire to allow farms and farmers to experiment with their own reduction policies, we should AT LEAST institute a monitoring program on creek and stream connections with our wider river system. In this way we could discern which areas produce the most egregious discharges and begin to work back up the systems to those who, knowingly or not, are producing the greatest discharge. If they are approached with the information and continue to ignore the problem, THEN we should take enforcement action through the civil/criminal courts.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #220.

Timestamp 12/23/2012 9:29

**Name** Robert Schwarz

**City** Sioux City

**State** Iowa

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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I live in western Iowa, much of which is hilly. Also livestock confinement systems have been multiplying tremendously. The current practice of spreading massive amounts of manure on farmland to lie there all winter and through the beginning of spring is a terrible source of pollution for our rivers and streams, groundwater, and, ultimately, the Gulf of Mexico. To ask farmers to voluntarily practice what is best for the environment is laughable. Ninety-nine percent of Iowa farmers are driven by profit, pure and simple. I applaud the few who aren't. I've lived in this area most of my life, know farmers, and have worked on farms and in agriculture-related businesses. I see ground too hilly for row crops planted with row crops. I see sloping land that should be terraced but isn't. I see overgrazed hilly pastures ravaged by erosion. I see crops planted right up to the very edge of steep river banks and creek banks. For the overwhelming majority of Iowa farmers, it's all about profit and short-term gain. They are NOT stewards of the land. Unless they are made to use more non-polluting farming practices, with enforcement for noncompliance, nothing will change. Hell, the farmers I know can't even drink their own well water because of the high nitrogen content. They have to buy bottled water.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #221.

Timestamp 12/23/2012 1:03

**Name** Beth Lynch

**City** Decorah

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I am just beginning to understand this document and am asking that the deadline for public comment be extended for at least 30 days. I work 50-60 hours/wk and simply have not had the time to read and understand the documents. Now that I have some time off for the holidays, I am finally getting started, but there is a lot of information to digest. 45 days is not enough time to get \*real\* public input on these important policies.

Thank you for considering this request. I would appreciate a response.

Beth Lynch

Middle Hesper Rd.

Winneshiek County, Iowa

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #222.

Timestamp 12/23/2012 1:12

**Name** MJ Hatfield

**City** Cresco (Plymouth Rock)

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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This strategy is not serious about cleaning up water. It is serious about maintaining the status quo, keeping some politically-powerful agricultural organizations happy, trying to keep the EPA off Iowa's back without having to take any serious action, and trying to convince the Iowa public that using the same voluntary approach to agricultural pollution that has been used for the past thirty years will somehow clean up Iowa's water in the future, although it has manifestly failed to do so and there is no reason to believe that will change.

A serious strategy would have detailed implementation. A serious strategy would have significant funding. A serious strategy would have deadlines and specific goals and standards.

A serious strategy would have a well-thought-out plan, based on sound social research, that would include effective incentives for farmers to change their practices. It would not be just a vague general proposal that amounts to announcing "From now on, we will say 'pretty pretty pretty please protect water' to farmers instead of just 'please.'"

A serious strategy would recognize that a voluntary approach is not enough. A serious strategy would recognize that a good strategy needs targeted regulations, designed to curb the worst agricultural practices, to even begin to be effective.

A serious strategy would not say to Iowans, "Those of you in towns and cities will be required to pay for upgraded sewage treatment. Those of you who own and operate the farmland that is causing most of the nutrient pollution problem will not be required to do anything at all."

This is a strategy that has only one underlying purpose, and that is to keep kicking the agricultural pollution can down the road for as long as possible. If the EPA is serious about cleaning up water, the EPA will not accept this strategy.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #223.

Timestamp 12/23/2012 3:28

**Name** Thomas G Carsner

**City** Iowa City

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**  **Nonpoint Source**

**Policy**  **Point Source**

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Voluntary compliance with water quality standards is an abrogation of responsibility by the IDALS/DNR. The consequences are too great to allow voluntary compliance--Iowa's water has been and continues to be too dirty to attract businesses and satisfy recreational users and operators of water treatment plants. It is a money loser. Plus, voluntary compliance does not work--it never works.

Iowans deserve clean water. Iowans deserve clean water that meets national standards. It is a public health issue. It is an economic development issue. Clean water costs money and cannot be accomplished on the cheap. Iowans have waited too long for clean water.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #224.

Timestamp 12/23/2012 3:44

**Name** Mr.D NARVESON

**City**

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Your strategy for lessening N & P in Mississippi River watersheds is unacceptable! Go back and do it right. Strategy should be developed with lots of input from stakeholders; & transparency is necessary.

We're in a new age now. A clean environment is good for people and profit, as well as for the planet.

Get it right -- get our waters & lands CLEAN.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #225.

Timestamp 12/24/2012 9:03

**Name** Linda Herman

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

---

Secretary of Agriculture Northey,

The answer is science-based state plans for nutrient strategy. Voluntary conservation can do this. Farmers want to do the best job they can of protecting the soil and the water and maintaining our ag production. I feel like I'm preaching to the choir, because I know you believe this also. I have heard you speak on the plans Iowa is putting together. Linda Herman

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #226.

Timestamp 12/24/2012 11:08

**Name** James Sliney

**City** Robins

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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My impression after reviewing the Iowa 'Nutrient Reduction Strategy' is that it fails to address a number of the key elements that are required by the EPA. Unless this document is revised to address the key elements required by the EPA it is my concern that the EPA will step in and enforce those key elements. In other words if the Iowa Plan is not up to the task, then the EPA will do the task and Iowa will suffer the consequences.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #227.

Timestamp 12/24/2012 2:51

**Name** Dennis Knipper

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

---

Secretary of Agriculture Northey,

I have been contour strip farming for about 25 years using minimum tillage. It is doing a good job of reducing run off and the practice doesn't cost the tax payer anything. Dennis Knipper

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #228.

Timestamp 12/24/2012 3:08

**Name** Gary Cromer

**City** Urbandale

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

---

The time for a program such as this, based on voluntary participation, has long since passed and in any case will not achieve the desired results. Only mandatory measures, backed up by enforcement and penalties, will work. Thank you.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #229.

Timestamp 12/24/2012 4:54

**Name** Bill & Linda Hotger

**City** Kellogg

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I believe Iowa's nutrient strategy will work to meet the targeted load reductions through voluntary practices that allow us, as farmers, freedom to develop our own customized solutions that will work for the needs of our farm & farm ground, avoiding expensive & ineffective mandatory regulations.

I support the voluntary reduction strategy.

This is an achievable strategy and I plan to work with my local Certified Crop Advisor, continuing the practices already in place on my farm, and implementing new ones, as my contribution to the goal.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #230.

Timestamp 12/24/2012 9:52

**Name** Mark Sarcone

**City** Ankeny

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

---

Iowans deserve better than a status quo strategy for contributing to the dead zone in the Gulf of Mexico.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #231.

Timestamp 12/25/2012 9:43

**Name** David Stoullil

**City** Manson

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Farmers are constantly monitoring run-off of the nutrients applied to our fields. We cannot afford to over-apply simply due to the cost of fertilizer prices. No one wants to over-apply nutrients just to watch them wash away. We have a sound science based program in place now please don't over regulate the process.

**Name** Constance Leino**City****State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

---

When the consequences are mandatory, why are the solutions voluntary? We who live and work downstream have no choice in the quality of water flowing to our drinking water utilities, our beaches, our rivers and streams. Nor do the people of the Mississippi Delta have a choice in the degradation of the marine habitat on which their lives and livelihoods depend. Millions of us face the mandatory consequences of ever more polluted water while ag operators are being given a choice in whether they will help prevent that pollution. Why?

It is akin to the trucking industry being given a choice in whether to stop at stop signs while absolving those truckers of all responsibility for not stopping. The State of Iowa, with much industry backing, would assure us that appropriate choices would be made. The truckers, however, would look at their spreadsheets and see that they could make their trips faster and increase their profit margins by not stopping. Of course the risk to the rest of us would go up exponentially. Conscientious truckers who wanted to observe the voluntary regulations and not cause harm to their fellow citizens would be placed at a competitive disadvantage. Their operations would become comparatively less profitable and therefore more vulnerable.

That is the effect of voluntary regulations. They create an unequal playing field. Those who want to observe the regulations must not only shoulder the short-term cost of doing the work but also the loss of revenue gained by those who don't. They are placed at a competitive disadvantage. With voluntary regulation a few will profit while the rest of us continue to bear the long-term cost of degraded soil and water.

Already, Iowa's highly conscientious family farmers face significant competition from industrial ag investors whose primary goal is profit above stewardship. In addition, nearly half of Iowa's farmland is rented out creating a substantial disincentive for the short-term expenditures that prevent long-term damage. Voluntary regulation makes no sense. Except, of course, to politicians hand in glove with the industry they purport to regulate. We deserve better. When the consequences to society are massive, costly and long-lasting, the solutions cannot be optional.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #233.

Timestamp 12/26/2012 8:48

**Name** Darcy Maulsby

**City** Lake City

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

---

I agree with the science-based, site-specific, voluntary approach of the Nutrient Reduction Strategy and also appreciate the fact that it's not a one-size-fits-all plan. The Nutrient Reduction Strategy offers a practical way to reduce nutrient losses from Iowa fields, maintain productivity and to avoid potentially costly and restrictive federal regulation. That's important to my family, since we've farmed in Iowa for more than a century and want to protect soil and water quality for years to come.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**234**.  
Timestamp 12/26/2012 2:48

**Name** Virginia Soelberg

**City** Johnston

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I am a volunteer water quality monitor and am active in environmental organizations that seek to improve Iowa's water quality and our soil's health. What can I do to help this effort succeed?

As I examine the Nutrient Reduction Strategy, I have great concerns.

Voluntary compliance is an oxymoron. And yet this is the position on which the Nutrient Reduction Strategy is predicated. For 40 years, since the Clean Water Act was first passed, Iowa has relied on the willingness of all farmers to adopt conservation measures that will improve Iowa's water quality and reduce hypoxia in the gulf. And this strategy has failed to protect and improve Iowa's waters. What does this new proposed strategy do that will make a difference in achieving the desired goal of reducing the nutrient overload in Iowa's waters? With no accountability, very little, I'm afraid.

Iowa DNR officials drafted the part of the new policy related to point sources, but Iowa Department of Agriculture and Land Stewardship personnel (with lots of apparent guidance from the Iowa Farm Bureau) wrote the policy on farm runoff. The DNR has water quality experts who understand the impacts of non-point sources on water quality, and yet they seem to have had no input in this major contributor to nutrient pollution of our waters.

The secretive process and lack of receptiveness to input concerns me. I would think the expertise of many Iowans would have been sought, not avoided. And the timing and format of the  educational meetings (no comments, and only written questions which were then edited by the reader) frustrated many. And this short time period for comments, during a holiday season, doesn't give us time to do justice to the material presented.

We need strategies that accelerate the reduction of N and P pollution. We need to use the data that are available and gather more so that progress can be measured. There need to be concrete ideas for implementation. Appropriate numeric nutrient criteria are needed. Timetables and consequences need to be in place.

I have grandchildren living in Iowa, and I want to leave a legacy of clean water and healthy soils. Iowa's future, and theirs, depends on protecting these precious resources.

Respectfully,

Virginia H. Soelberg

5979 Dogwood Circle

Johnston, Iowa 50131

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**235**.  
Timestamp 12/26/2012 3:55

**Name** Tom Cain  
**City** Shell Rock  
**State** Iowa

Providing comment on the following sections:

Executive Summary     Nonpoint Source  
 Policy                       Point Source

---

I am very concerned about the dead zone in the gulf of Mexico-Mississippi basin, but feel that we need to be equally concerned about Iowa's groundwater as it is being polluted first by the same source polluters as the basin. If we take care of Iowa's

groundwater we automatically take care of our commitment to do everything we can to eliminate Iowa's contribution to the dead zone.

The excessive amount of nitrogen and phosphorous released into Iowa's groundwater by manure pits, manure application, and fertilizer application on Iowa's farmland due to run off is a travesty.

Where, how, and when manure is applied needs to be reviewed and monitored by the IDNR unfettered by the political baloney that has occurred for way too many years.

The Iowa Farm Bureau needs to be removed from this discussion since they have a direct conflict of interest insuring corporate farmers and their manure pits and manure applying practises, and therefore their own purse strings. Corporate farmers shouldn't write policies, they should be required to abide by them.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #236.

Timestamp 12/26/2012 3:55

**Name** Tom Cain  
**City** Shell Rock  
**State** Iowa

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

---

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# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #237.

Timestamp 12/27/2012 9:49

**Name** Susan Shullaw

**City** Iowa City

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**  **Nonpoint Source**  
 **Policy**  **Point Source**

---

I wholly agree with the opinion piece written by Neila Seaman, director of the Iowa chapter of the Sierra Club, which appeared in the Cedar Rapids Gazette and other media on December 27, 2012. (See the full article at <http://thegazette.com/2012/12/27/nutrient-reduction-strategy-is-flawed/>.) As Neila wrote, "Iowa's answer to reducing nutrients in the Mississippi River watershed is to keep doing what we've been doing. It's insulting to Iowans who expect their state-funded entities to protect our water quality to arrive at such an inane solution to a serious problem. It's time for Iowa to develop a serious solution to the problems created by runoff, particularly manure, and for Iowans to demand more from its governmental entities." Iowa's abysmal water quality is a disgrace, harming our citizens, our economy, and our environment, as well as contributing to the Gulf's "dead zone." Iowa needs to clean up its act, and IDALS needs to show more guts and leadership.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #238.

Timestamp 12/27/2012 10:41

**Name** Robert Anderson

**City** Decorah

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I am VERY concerned about relying on volunteer efforts to reduce nonpoint chemical releases for the Ag industry. With the recent increases in corn prices I have witnessed conservation strips, waterways and buffer strips being plowed up all for a few more rows of the precious corn. We Cannot rely on volunteer efforts by the Ag industry as it is clearly not willing to provide conservation efforts. One would have to be blind or completely ignorant to not witness the ongoing destruction of conservation efforts, all for the purpose of a few more rows of corn. As an avid fisherman who frequents several of NE Iowa rivers I am saddened to see first hand rows of corn tumbling into the river from erosion. Again, PLEASE mandate conservation programs such as required buffer strips for waterways and reduction of chemical fertilizers and insecticides.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #239.

Timestamp 12/27/2012 11:03

**Name** Timothy Mason

**City** RR McGregor

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Dear paid bureaucrats, I was born, raised and currently live in what we call Iowa. in the last 60 plus years I have watched the environmental health of our land & air be destroyed due to the agricultural industry. The "Greed-Pigs" who run our state government are the same who profit from the agricultural industry. Confinement animal factories, the monoculture of corn & soybeans and high soil erosion in our streams defines what Iowa is today. The stink of hog shit alone is unacceptable. Last summer I traveled east to west thru central Iowa and could not believe the stench. I spend a large number of days and nights on the Upper Mississippi River in our family houseboat. We see the effects of your policies firsthand. Do your jobs for our grandchildren, stop thinking of money,money, money! Sincerely Timothy Mason

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #240.

Timestamp 12/27/2012 11:55

**Name** Carol belzer

**City** Ames

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

---

The committee needs to go back to the drawing board and do this the right having a science based outcome!

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #241.

Timestamp 12/27/2012 11:58

**Name** Anne Clark

**City** Ames

**State** Iowa

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input checked="" type="checkbox"/>	<b>Point Source</b>

---

This Strategy document is so flawed it is hard to know where to start. First, I object to the secrecy and non involvement of the public and pollution experts from DNR. I strenuously object to the Farm Bureau having anything to do with policy-as was clear by wording lifted from FB literature. I'm tired of FB having so much influence in these decisions. The 90+% of non-farm citizens of Iowa have more interest in the health of Iowa's waters than the 3+% of farmer citizenry, yet the Strategy seems to only address agriculture interests, not responsibilities.

We have tried voluntary compliance to clean our waterways for years and our water is more polluted than ever. It doesn't work! Farmers and lawn services (who add a lot of fertilizer via runoff from streets etc.) need to have heavy penalties applied if they choose to not comply with pollution laws.

We have had had many studies which are just excuses to put off the action needed to clean rivers and streams. The DNR has a great deal of information about which watersheds are polluted and with what. That can be used as a starting point.

The Strategy wants to explore new technologies etc.-we know what needs to be done. Our problem is we don't require our citizens to do it.

The Strategy says action should depend on economic impacts-our water is unusable and a disgrace. What about the economic impact of compromised drinking water supplies? What about the possible future economic impact of pristine waterways on our health and perhaps tourism? That was not addressed by the Strategy, only the economic interests of agriculture. Those interests have proven to be detrimental to clean water in Iowa.

There are no timelines or benchmarks set down by the Study to tell us if things are getting done.

I could go on and on. This "Strategy" is an embarrassment to Iowans and will just help polluters put off cleaning up their act for more years. At some point it will be too late.

**Name** Jeff Schnell**City** Des Moines**State** Iowa**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input checked="" type="checkbox"/>	<b>Point Source</b>

Thank you for the opportunity to comment on the Iowa Nutrient Reduction Strategy, (Strategy) released on November 19, 2012. The Agribusiness Association of Iowa (AAI) congratulates the tremendous effort by the Iowa Department of Natural Resources, Iowa Department of Agriculture and Land Stewardship and Iowa State University. AAI supports the Strategy and encourages all Iowans, policy makers, farms, businesses and academia to embrace the draft and its implementation.

Cooperation from Point and Non- Point Sources:

This draft, for the first time, encompasses both point source and non-point source targeted reductions of both Nitrogen and Phosphorus. We are impressed that the urban and rural share common goals, despite differences in how the reductions are reached. While the Strategy focuses on 130 point source permits, the non-point sources are estimated to be around 90,000 farms. This difference requires executing cooperative, science based solutions from non-point sources as it is not practical to permit 90,000 farms.

Harnessing the collective rural effort:

Recently, many non-profit agriculture groups have been focusing on water quality generally and nutrient reduction specifically. The Strategy can become the road map for a coordinated effort from non-point sources and thus, for the first time, encourage similar goals and program objectives. This is critical to the success of the Strategy. Farms, rural agribusinesses and the organizations that represent them stand ready to implement the Strategy; we simply need to begin as soon as practical.

Consideration of multiple objectives; balancing water quality and food production:

Careful consideration should be placed with balancing water quality improvements with the production of food, fuel and fiber in Iowa. The Strategy balances those objectives by the well documented and thorough scientific assessment portion. We believe the scientific assessment is one of the strongest aspects of the Strategy and should be the basis for water quality improvement projects across the state.

Emphasis on Certified Crop Advisers:

The Strategy highlights a previous untapped resource, Certified Crop Advisers (CCAs). Iowa is home to over 1,000 CCAs who advise farmers on a myriad of soil quality and nutrient management issues. Many CCAs work directly with agriculture retailers to develop and implement field practices. The use of these trusted professionals will be critical in implementing the Strategy.

Sincerely,

Jeff Schnell

CEO, Agribusiness Association of Iowa

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #243.

Timestamp 12/27/2012 5:08

**Name** Gregg Schmitz

**City** Wall Lake

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I support and believe based off of 30 plus years in Iowa that a voluntary approach to Iowa's nutrient reduction strategy is and will continue to be the best direction. We have seen steady progress over the years in reducing the nutrient load on the environment with science-based research & practices all while increasing our production of food, feed, fiber and fuel in a growing world population.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #244.

Timestamp 12/27/2012 6:35

**Name** Roger Blanchfield

**City** Churdan

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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As an Iowa farmer and an ISU graduate, I am open to practices that will keep more of the essential crop nutrients and soils in the field and out of the rivers and streams. An important part of the solution is to adopt practices that will keep soils in place. I believe that if we keep the soils in place the nutrients will stay in place also. I think no-till practices should be adopted on fields that have slope, and minimum tillage should be practiced on more level land. On our farm we have more level land and practice minimum tillage to keep soils in place. We also have buffer strips and practice other conservation measures which are helpful.

An idea that I have not heard discussed, and that I believe would have an enormous impact to filter the waters entering the Gulf of Mexico is to re-establish nature's wetlands in the Gulf States, particularly in the Delta Land in Louisiana. Unfortunately we have destroyed nature's wetlands which were established naturally to filter waters before entering the Gulf of Mexico, even building cities below sea level. I think it is time to consider re-establishing those very important wetlands in the Gulf States!



**Name** Joe Herring**City** Eldora**State** Iowa**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input checked="" type="checkbox"/>	<b>Point Source</b>

This plan obviously represents a massive effort put forth in terms of the time and energy of its authors and reviewers. I cringe to think of its duplicative nature relative to other similar reports, assessments, and plans at not only the state and federal levels, but also at the watershed scale here in Iowa (TMDL reports, etc). May it soon join the others and rest in peace on some bureaucrat's shelf.

As the report states, 92% and 80% of N and P loads come from non-point sources; by calling for business-as-usual, this entire effort was a waste. Voluntary efforts have been going on for decades. The plan promises to increase efforts, but there are no concrete statements made that would instill confidence that anything's going to get better.

The targeting of HUC-12's is a good start, but voluntary means voluntary --- it can only take you so far. Iowa's going to have to get serious about ponying up for conservation if it expects land managers to adopt practices. The current programs are not keeping pace with the grain & land price bubbles. Conservation is going in reverse right now with aggressive land clearing. We need an uphill-down approach to conservation that not only targets efforts but also offers enhanced incentives. A new or better CRP that pays more for practices would be a good start.

Ultimately, we just need more perennial cover and less drainage tile. In-channel erosion is the result of agriculture's need to shed excess water as expeditiously as possible. As long as we allow tiles to shoot directly to our state's surface waters, the nutrient problem won't get any better (nor will sedimentation and flooding).

And as for a regulatory approach, I think it's probably time that Iowa's citizens demand the same respect for its public resources (air, water, & wildlife) that other industries must give. Iowa's agricultural community is no longer a de-centralized constellation of tiny family farms raising a few animals and varied crops; it's a fully incorporated and industrialized business. No other industry would be allowed to pollute the public air, dump untreated effluent into its public rivers & streams, nor destroy virgin habitat for the sake of profit to the extent that agriculture is allowed to...and it certainly would not be subsidized with taxpayer dollars in the forms of price supports, insurance and disaster payments, tax write-offs, etc! I think a small dose of regulation (to go along with the voluntary measures in this plan) is not uncalled for.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #246.

Timestamp 12/28/2012 6:22

**Name** David L Meeker

**City** Alexandria

**State** Virginia

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

---

December 28, 2012

Mr. Bill Northey, Secretary

Iowa Department of Agriculture and Land Stewardship

Mr. Chuck Gipp, Director

Iowa Department of Natural Resources

Wallace State Office Building

502 East 9th Street

Des Moines, IA 50319-0034

RE: Iowa Nutrient Reduction Strategy

Dear Secretary Northey and Director Gipp:

The National Renderers Association (NRA) is a trade association of the animal byproducts processing industry. The rendering industry consists of more than 35 firms that operate more than 200 plants across the United States and Canada. NRA member firms own and operate several animal byproducts processing facilities in Iowa.

The US livestock and meat production system produces an enormous amount of byproducts that are in turn transformed into nearly 20 billion pounds per year of highly valuable feed and industrial products in the form of various types of fats and proteins. Rendering is a green industry that protects the environment by recycling carbon and energy and allowing items such as byproducts to be utilized as valuable pet or livestock feed ingredients or biodiesel rather than entering a landfill. Rendering is the most efficient and environmentally sound disposal alternative and has a low carbon footprint. Rendering facilities generate wastewater that contains wastes generated from the breakdown of natural proteins, including significant concentrations of nitrogen and phosphorus.

Many of NRA member owned plants in Iowa discharge pretreated wastewater to city or public owned treatment works (POTWs). Therefore, NRA members are very concerned about the potential impacts of the Iowa Nutrient Reduction Strategy on the POTWs that receive and treat rendering plant wastewater.

NRA supports the Iowa Nutrient Reduction Strategy approach to reducing nitrogen and discharge loads from wastewater treatment plants. The application of appropriate technology for removing nitrogen and phosphorus to reasonable and economically achievable concentrations is a good approach. The strategy will result in significant reductions in nitrogen and phosphorus discharges from wastewater treatment facilities at reasonable projected costs.

NRA also supports the coordinated nonpoint source nutrient reduction strategy approach. The Iowa approach may serve as a model to other states as they develop similar strategies. The Iowa approach is a common sense plan that combines the information from the expert review of nonpoint source nutrient control practices with a water shed prioritization for directing any public resources and encouraging voluntary modification in farming practices to the most cost effective nutrient reduction projects and farming methods.

Sincerely,

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 2 of comment #246.

Timestamp 12/28/2012 6:22

**Name** David L Meeker

**City** Alexandria

**State** Virginia

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

---

David L. Meeker, Ph.D., MBA

Senior Vice President, Scientific Services

National Renderers Association

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #247.

Timestamp 12/28/2012 6:43

**Name** David L Meeker

**City** Alexandria

**State** Virginia

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

---

December 28, 2012

Mr. Bill Northey, Secretary

Iowa Department of Agriculture and Land Stewardship

Mr. Chuck Gipp, Director

Iowa Department of Natural Resources

Wallace State Office Building

502 East 9th Street

Des Moines, IA 50319-0034

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# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **2** of comment #**247**.

**Timestamp** 12/28/2012 6:43

**Name** David L Meeker

**City** Alexandria

**State** Virginia

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

---

Sincerely,

David L. Meeker, Ph.D., MBA

Senior Vice President, Scientific Services

National Renderers Association

801 N. Fairfax St., Suite 205

Alexandria, VA 22314

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #248.

Timestamp 12/28/2012 12:10

**Name** David Coppess

**City** Urbandale

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

---

I believe Iowa's nutrient reduction strategy will work. It's a unique, joint effort between the point source and non-point source communities that can achieve the targeted load reductions through voluntary efforts. Implementing science-based management practices, lead by certified crop advisors, who are capable of customizing solutions that fit specific needs of individual farmers, can allow us to avoid expensive and often ineffective, mandatory regulations designed as one-size-fits-all solutions. This will not be a quick fix approach, but an on-going, sustainable remedy that will not impede our state's role as the nation's leader in food and renewable food production. It is good for Iowa, our environment, our economy, and our citizens.

**Name** David Osterberg**City** Mount Vernon**State** Iowa**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

David Osterberg, Executive Director of the Iowa Policy Project, makes the following comments on the agriculture policy section of the proposed Iowa Nutrient Reduction Strategy:

Section 1  Policy Considerations and StrategyPage 12  Conservation and Water Quality Funding

The section presents misleading data, as it covers only the last two fiscal years. This is inadequate for a report of this supposed breadth. Using only the last two fiscal years allows the authors to imply that funding for water quality has remained the same or increased a bit. The past ten years of data demonstrates this skewed implication is false.

The Iowa Policy Project looked at last decade of water quality funding and found about a 30% reduction in program funds administered by the Department of Natural Resources and the Department of Agriculture and Land Stewardship. The report we released in March of this year states the following:

When adjusted for inflation most of these programs saw significant decreases; the average inflation-adjusted decrease for these seven budget items is over 30 percent. In seven of the 10 programs, funding declined over the span of 10 budget cycles.  (Page 5 of Drops in the Bucket: The Erosion of Iowa Water Quality Funding.) <http://www.iowapolicyproject.org/2012docs/120301-water.pdf>

A second, more recent IPP report update found the Iowa Legislature did not do much more than make very small increases in a few programs, thus our findings remain valid and more pertinent to the issues at hand. Water quality funding has decreased markedly over time. (See Drops in the Bucket: Even Rare Boosts in Water Funding Evaporate with Inflation.)

<http://www.iowafiscal.org/2012research/120626-IFP-water-bgd.html>

One example shows how this section of your report is misleading. By picking only two years, your authors implied that the Watershed protection fund, which now stands at \$900,000, did not change. It did not change between FY12 and FY13, however as recently as FY07 it was \$2.7 million and if inflation is considered the reduction has been more, down from \$3.7 million in FY03.

Page 17  Animal Feeding Operations

Another example of misleading by omission is in the discussion of water quality impacts of animal feeding operations. The authors somehow left out the fact that EPA is threatening to take over the NPDES permit program from Iowa because of DNR's inadequate job of regulating animal agriculture in the state. Your authors may not agree with EPA's contentions, but they should not be given the luxury of avoiding this important point. While one might be able to make a case that reducing the number of inspectors from 23 in 2004 to 8.75 in 2010 was justified and did not affect water quality, the EPA perspective and potential action must be acknowledged. One must ask if this omission is meant to cover up the controversy.

Page 19  Funding

The pace of the strategy's implementation will be subject to available financial and human resources.

Also stated elsewhere, as an  action item for funding in the Executive Summary:

Make most effective use of funding resources including maximizing benefits per amount expended.

Overall Strategy for Non-Point Pollution Reduction

As stated in the Executive Summary (Page 7),  This strategy encourages the development of new science, new technologies, new opportunities and further engagement and collaboration of both the public and private sector.

## Iowa Nutrient Reduction Strategy

Online comment submissions

Page 2 of comment #249.

Timestamp 12/28/2012 1:41

**Name** David Osterberg

**City** Mount Vernon

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**  **Nonpoint Source**

**Policy**  **Point Source**

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However, nowhere does this report mention anything about new funding. Furthermore, this omission is part of a strategy statement that falls woefully short on action, when farmers have known what to do for generations.

Secretary Northey in the recent Water Resources Coordinating Council on December 6, 2012, stated that his agency would ask for more resources in the next fiscal year for cost-share dollars to encourage implementation of this strategy, which calls for nothing more than voluntary adoption of agricultural measures to reduce nutrients. However one need only look at funding for his agency and the DNR on Water Quality programs over the last decade to understand his request is inadequate. Given these specific instances of the inadequate job with agriculture policy, it is difficult to conclude IDALS is serious about reducing N and P in Iowa waters.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #250.

Timestamp 12/28/2012 3:13

**Name** Carol Tripp

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

Secretary Northey, I support a science-based state nutrient strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. On our central Iowa farm, we practice no-till planting, plant cover crops, and leave crop residue from the previous year's crop for soil fertility and conservation. In the future we hope to develop livestock water sources from current run-off. Carol Tripp

**Name** Rosalyn Lehman**City** Des Moines**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

December 28, 2012

Nutrient Reduction Strategy

ANR Program Services

2101 Agronomy Hall

Ames, Iowa 50011-1010

Re: Comments regarding Iowa's Nutrient Reduction Strategy

Iowa Rivers Revival appreciates the opportunity to submit comments regarding the Iowa Nutrient Reduction Strategy. IRR believes that this Strategy does not adequately address the huge impact agricultural practices contribute in contaminating Iowa's rivers and the rest of the Mississippi watershed's water supply. As written, this Strategy will fall short of protecting Iowa's waters. This Strategy requires revisions that include new, measured and accountable approaches to reducing agricultural chemicals in our waterways.

1. The current plan provides no accountability for farmers to implement conservation measures that significantly reduce the impact of non-point agriculture pollution. Instead, this plan maintains the status-quo by sanctioning only voluntary conservation measures by Iowa's agricultural industry to address water quality concerns. Nearly a century has now passed since government institutions have been involved with voluntary conservation efforts for non-point agriculture pollution and little progress has been made in protecting and restoring clean water to our rivers. The plan needs to incorporate new common sense conservation requirements on all farms to reduce soil erosion and protect water quality.

2. If this is the best plan that Iowa's environment, conservation, agriculture, government and university leaders can produce to protect Iowa's water ways, then the Environmental Protection Agency should oversee and manage our state's water quality on behalf of all residents and industries that reside within the Mississippi watershed.

3. The public comment period should be extended beyond the January 4, 2013 deadline to allow an opportunity for all citizens and stakeholders to better review this Strategy and provide their feedback and ideas to strengthen this plan so that the final plan will have a chance to make a positive impact on the future of Iowa's water quality.

Iowa Rivers Revival is the statewide river education and advocacy non-profit organization committed to protecting one of our most precious natural resources - our rivers and streams. IRR is working to engage individuals, organizations, communities and government leaders in river awareness, responsibility, and enjoyment in an effort to improve and enhance the condition of Iowa waterways - ensuring a quality, safe and lasting resource for future generations.

As river advocates, citizens and taxpayers who are impacted by the outcomes of this Strategy, we appreciate your thoughtful review of these comments and urge efforts to implement a plan that can truly improve and protect Iowa's rivers and water quality.

Sincerely,

Jerry Peckum

Board Chair

cc Environmental Protection Agency

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 2 of comment #251.

Timestamp 12/28/2012 3:28

**Name** Rosalyn Lehman

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Policy

Nonpoint Source

Point Source

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# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #252.

Timestamp 12/28/2012 4:34

**Name** Jolene Riessen

**City** Ida Grove

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Are you taking into consideration that pytaxe is being added into hog feed and this is cutting down on the amount of P in the hog manure?

Also is the watershed areas all identified or is there more areas going to be identified like the Maple River area?

I am very happy to see a science based approach to the nutrient management of our water and am also glad to see that there needs to be a combination of nutrient strategies to clean up the water. I think farmers will be able to embrace making little changes to control nutrient run off verses one sweeping rule that some farmers may find hard to work into their farm.

How often and how will measurements be made to see how progress is being made? Will the county soil conservation offices have a report card on individual farms near creeks and streams and rivers to see how they are doing with nutrient runoff? I know on our farm we use conservation tillage, cover crops, N stabilizer products and we will be working with some notill this spring to help us manage ntrients. Are you looking to go count by county on this or are you looking at just certain areas that historically have been having nutrient management problems?

Thank you for taking the first steps to fixing the problem instead of outside groups trying to tell farmers what to do. Work with us and show us better ways and we will follow!

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #253.

Timestamp 12/28/2012 5:44

**Name** Larry Gullett

**City** Center Junction

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I would like to make two comments related to the proposed Nutrient Reduction Strategy which was released for comment in the last few weeks.

1. Iowa needs numeric standards and goals related to reducing nutrient and bacteria in surface waters. The numeric standards must apply to wastewater treatment systems, urban runoff and agricultural/rural inputs. In addition, the plan should also address groundwater so we don't just relocate the problem from surface water to ground water.

2. The strategy is seriously flawed in it's failure to address social and cultural education and outreach in the implementation and planning phases of the project. In fact, the plan should be written with input from public meetings around the state to identify problems and obtain input/suggestions from the public on the best way to reduce nutrients/pollutants. It seems this inclusive process was omitted in development of the strategy. In such a large effort it will be imperative that all people understand the issues so they support moving forward with implementation programs. This is especially important when asking people to participate and support such large expenditures of public funds. If we fail to inform and educate, and make a strong effort to "listen" to the people, then the program will fail before it is even started.

Thank you

Larry Gullett

**Name** Dan Allred**City** Corydon**State** Iowa**Providing comment on the following sections:**

<input type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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I would like to take this time to express my personal interest in the nutrient reduction project. I believe we need to put in place practices to reduce lost nutrients. Im all about keeping the 800 and 900 dollar at ton fertilizer on my ground where it will do some good. It would benefit me economically to use less fertilizer for the same yield. But you have to remember we are trying to make a living off this land and we need to be making decisions based off sound research and testing of crop responses and yields from different amounts nutrients applied. You just cant simply cit back on fertilizer rates and expect the same results. As producers, we cant afford to have regulations pushed down our throat based off some desktop agenda in the government. We need sound nutrient recomendations based off of proven results in the past. It may be that we need to explore new nutrient placement technology and timing of application.

I think there is a way to grow crops with less applied nutrients but it needs to have some research to prove that it will still result in a crop yield that is still economically feaseable for a grower.

There are also conservation measures to be considered that can help reduce runoff and that should be considered as well. I think as producers, there should be some financial incentives offered to put these measures in place, especially where the land is being rented.

Thanks for allowing space for comments.

Dan Allred

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #255.

Timestamp 12/29/2012 7:36

**Name** Linda Schroeder

**City** Nevada

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I am appalled that the reversal of toxic (yes toxic, the dead zone attests to it) waste run off is such a low priority for the creators of this disaster. Voluntary only goes so far. The State of Iowa must start regulating as well as educating. Seems like withholding payments would be an effective incentive. Might also help save some of the 25% of grade A farm land Iowa used to have.

**Name** Richard Fischer**City** Bernard**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

I live on 40 acres in the Lytle Creek Watershed Project. This is part of the Mississippi River Basin Initiative.

After attending their information session on 14 November 2012, I was disappointed by the the voluntary nature of soil management fixes.

As I read parts of the Iowa Nutrient Reduction Strategy, I was also disappointed for the same reason: voluntary compliance.

One of the major problems with CAFOs and to a lesser degree with all livestock farming, is what to do with the manure. There is too much of it to spread over pasture and crop land. The practice of spreading it on snow and frozen fields still persists and much of it is place on erodible and highly erodible land or on land that is directly adjacent to streams. I watch one parcel of land that has manure spread on it between snows each winter and then watch as the creek floods the land most springs. I always wonder how much of that manure is washed down stream.

It is my observation over the past seven years of living in rural Iowa, that there is little enforcement or regulation of the amount of nitrogen being applied to fields, especially to soybeans, which probably do not need any and certainly not the large dosage from a manure spreader.

The watershed west of us recently had a large fish kill attributed to a rain event that caused an outdated manure holding tank to overflow. A fine was levied, which was a good thing, but there d id not seem any change or modification of the "faulty" holding tank and as far as I know the fine has not yet been paid.

I favor strong and effective regulation of the storage and the application of manure. I expect that there be immediate and stringent enforcement of any and all violations. Voluntary compliance will not increase the water quality of Iowa's surface waters nor of the Mississippi River Basin or the Gulf of Mexico. Offering a polluter tow or three violations before taking effective action and enforcement of regulations is the wrong approach. We have the studies, there are good models that show how to effectively, safely, and prudently store manurer and how and when to apply it appropriately. These best practices may increase the cost of farming, but they will also assure that farming will be done in a manner that will help the environment, improve our water, and have a positive effect on our air quality.

The application of chemical fertilizer needs to be greatly reduced. The best way to do so is through grass-based dairy and cattle farming. Reduce the size of all herds and allow them to forage. Move to a sustainable rather than a profit based agriculture. Most sustainable farming does make a profit, but more importantly it reduces the harm to the soil, water, and air in doing so.

My bottom line is strong effective regulations that are strictly enforced from the first violation through compliance. Hence, we need more DNR officers to do the enforcement and they need to be free from the influence of The Farm Bureau, Monsanto, and the livestock industry, and the Industrial Agricultural Industry. The Iowa Department of Natural Resources needs to coordinate with US EPA and comply with and Federal guidelines for waste management, both on the farm and in the cities.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #257.

Timestamp 12/30/2012 8:19

**Name** John Moellers

**City** Kellogg

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I'm writing in response to the Iowa Nutrient Reduction Strategy that was recently released by IDALS, the Iowa DNR, and ISU. I'm concerned that the strategy's recommendations for dealing with nonpoint sources consisted of: "... targeted voluntary conservation measures, in conjunction with research, development and demonstration of new approaches...". Voluntary conservation methods are mostly what we (Iowans) been doing in regards to nonpoint sources of nutrient pollution up to the release of this study. Producers of non-point sources currently have few financial reasons to implement the changes required to mitigate this problem. Obviously we need to do something different. Whether it be a tax break, increased fees, or inspections, something needs to be done to improve compliance with the various possible methods to reduce nutrient pollution.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #258.

Timestamp 12/30/2012 9:50

**Name** Jay Lynch

**City** Humboldt

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I raise Corn and Soybeans on my farm in Humboldt County. I support the nutrient strategy for Iowa. The weather is my biggest challenge every year on my farm. Nutrient Management needs to be flexible to change as the weather changes from farm to farm. I have used many best management practices over my farming career and are still using many of them today. I use strip till/ no till, terraces, waterways, filter strips on my farms. When I first started using many of these practices, I received assistance. This assistance was more than just financial, it included management ideas and past experiences. This voluntary choice to improve the environment and my farm works better than regulations. As I look at different practices to use. Some practices work best on different areas of a farm. And what works best on my farm doesn't always work best on different parts of the state. That is why I support this nutrient strategy.

Sincerely

Jay Lynch

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #259.

Timestamp 12/31/2012 9:41

**Name** Matt Siefker

**City** Eagle Grove

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The best solution to reduce the hypoxia zone in the gulf is for everyone to work together. Farmers should be allowed to choose which ways to help reduce nutrient runoff that best fit their operation. No operation is the same. No one has the same land. Farmers are more able to determine the best solution than someone working from behind a desk in Washington. Iowa already leads the nation in filter strips, waterways, and I believe CRP. We will continue to lead the country in keeping our water clean!

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #260.

Timestamp 12/31/2012 12:48

Name Patricia Fuller

City Council Bluffs

State Iowa

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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This Strategy was developed with very little to no input from stakeholders. Transparency was nonexistent. Several DNR staff submitted comments on the Strategy prior to the document's release to the general public. I am sure you have read their comments by now but just to reiterate, I quote them directly:

"Major fundamental flaws permeate the  Strategy while concrete ideas for implementation are not provided.

After review of the  Strategy it is clear that the development lacked diverse participation including and especially from nonpoint water quality professionals. This document reflects a narrow view not appropriate for a state-issued document. This is evidenced by entire paragraphs being copied from an Iowa Farm Bureau comment letter (without proper citation) submitted in response to the Raccoon River Master Plan, and all costs and benefits being based on production of a single commodity crop. This evidence calls into question the development of the entire document, as similar narrow-view and single-objective  talking points are a consistent theme.

Further, responses to some elements of the Stoner Memo simply echo its original language, reflecting a lack of serious consideration in the responses to some of the elements. The  Science Assessment evaluated a number of possible strategies that could be implemented to reduce nutrients in local and downstream waterbodies. However, the  Strategy could best be summarized in two words   Status Quo  as the document lacks novel or innovative concepts for implementation, lacks a commitment to any measurable load reductions, and lacks accountability in tracking and obtaining progress.

The  Strategy as written risks the perception of shielding the 3 percent of Iowans who farm for a living from being given the information needed to make sustainable land management decisions. This is unfair to farmers and the remaining 97 percent of Iowans who should all be served by, and have a vested interest in, the State of Iowa  s

Nutrient Strategy. By associating DNR with this document, as written and without major revisions and without including a more open, collaborative process, and by releasing it as a joint IDALS/DNR document, DNR runs the very real risk of sullyng our department  s reputation with the 97 percent of Iowans that are not farmers, as well as with progressive conservation farmers who are seriously committed to reducing their N and P contributions to streams and rivers. Some of Iowa  s best and brightest were used to help develop the science assessment piece of this document, including respected scientists, agronomists, engineers, and economists from Iowa State University. However, the  Strategy does not synthesize their research in an organized way to show a path forward."

Our contribution to the "dead zone" is need of a real solution, instead of the status quo.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #261.

Timestamp 12/31/2012 2:47

**Name** Mark River

**City** Carroll

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                               **Point Source**

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I believe we need high-tech solutions in order to solve the nutrient problem here in Iowa. One piece of technology that I think is very useful is the Wetland Builder software by Agren. In Carroll County we have used this software to help design a couple of wetlands on county-owned agricultural properties. It is a fast and economical way to do most of the design work from a computer before ever stepping foot in the field. With tight budgets and less staff in many state and federal conservation departments, this could be a way to make staff time more efficient & effective. I think making this software available statewide in NRCS offices would give conservationists another tool to effectively design wetlands (which are a critical BMP) to catch nutrient runoff from Iowa's agricultural lands.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #262.

Timestamp 12/31/2012 5:06

**Name** Erwin E. Klaas

**City** Ames

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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## Comments on Iowa Nutrient Reduction Strategy

I have served for 12 years as a County Soil and Water Conservation District Commissioner. During this time, I have seen continual funding cuts for conservation in both state and federal budgets. The Division of Soil Conservation in Iowa is operating on a budget that is equivalent to 1994 levels of funding. Technical staff has been reduced by more than a third. Our county now shares staff (both federal and state) with a neighboring county. As of this writing the 2012 Farm Bill has not been voted on by the U.S. Congress, and consequently critical federal conservation programs have expired. Voluntary incentives have not been sufficient to accomplish nutrient reductions, especially with a reduction in technical assistance to deliver existing programs.

The Iowa Nutrient Reduction Strategy is a strategy to maintain the status quo of soil erosion and water pollution. This is unacceptable. I recommend the following:

1. Establish regional water quality standards for agricultural nutrients and pesticides, especially nitrogen, phosphorous, and atrazine based on the concept of total maximum daily loads (TMDLs). These standards should be numeric, enforceable and fair for everyone.
2. Develop a certification program for farmers based on the principles developed by the Mississippi River Collaborative. Certification should be based on system-based whole farm conservation plans.
3. Re-organize County Soil and Water Districts according to watershed boundaries rather than political boundaries. Provide these commissions with adequate funding and staff do their job.
4. Provide County Soil and Water Districts with authority to administer landowner certifications.
5. Transfer administration of drainage districts to Soil and Water Districts.
6. Require all counties to inspect and enforce sanitary treatment for all rural residences.
7. Develop a code of land stewardship based on land ethics and long-term sustainability.
8. Immediately begin a long-term program to improve soil health using new research based practices such as the application of composted animal manure, green cover crops, and no-till.
9. Phase out corporate-owned concentrated animal confinements and replace with more humane and environmentally sound practices.
10. Initiate a state-wide farm protection plan that will protect the most fertile soil in the world from urban, commercial and industrial development.

**Name** mike delaney**City** des moines**State** iowa**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input checked="" type="checkbox"/>	<b>Point Source</b>

I would like to comment on the Iowa Nutrient Reduction plan.

The agricultural component of the Iowa response to the EPA request for a pollution reduction plan looks like something put together by chemical dealers and commodity groups. The plan calls for mandatory reduction of pollution from cities that accounts for about 10% of our nitrogen and phosphorus pollution, but only voluntary efforts on the part of the agricultural sector that accounts for 90% of the pollution. The plan is weak on measurement of changes that might result from any efforts and expresses minimal interest in whether Iowans will be able to swim safely or fish successfully in our rivers. One problem with an all-voluntary approach in the agricultural sector is that  good actors are punished and polluters are rewarded. If a farmer does everything recommended by the Iowa State University experts to reduce nutrient loss he or she loses money. The farmer who tears out past conservation practices, installs more tile, plows every square inch of his or her land and pours on excess nitrogen and phosphorus will be rewarded with greater short term profits.

I would like to recommend the following:

1. Iowa rivers and streams in Iowa should be fishable and swimmable.
2. The Iowa DNR or the EPA should enforce the Clean Water Act.
3. Violators of the Clean Water Act should be fined.
4. The Iowa DNR should figure out how much nitrogen and phosphorus is leaving the state.
5. The State of Iowa should seriously plan to comply with the Stoner letter request for a 45% reduction of nitrogen and phosphorus in our waters.
6. The State of Iowa should set nutrient standards for nitrogen and phosphorus at levels that will protect aquatic life, the health of Iowans who use our rivers for drinking water.
7. The Iowa governor and legislature should appropriate funds for the purpose of monitoring the amount of nitrogen and phosphorus leaving Iowa's HUC 8 and HUC 12 watersheds.
8. Watersheds that are contributing the most nitrogen and phosphorus should be targeted first for nutrient reduction.
9. The best of our cold water and warm water streams should be protected so that there is no further degradation of water quality nor loss of species diversity in Iowa.
10. Monitoring should be put in place to measure actual progress in the reduction of nutrients in watersheds where best management practices have been implemented.
11. The Iowa governor and legislature should budget funds for the DNR to review and enforce manure management plans.
12. Since elevated nitrogen is toxic to some forms of fresh water aquatic life affecting river health and fishing, biological assessment of river health should accompany chemical assessment.
13. The nitrogen tax rate should be increased and the revenue generated should be used to reduce nitrogen pollution.
14. Point sources need to be more strictly regulated due to the toxic impact of high levels chloride, ammonia and nitrogen on aquatic life down stream.
15. The assumption that Iowa land owners will voluntarily apply  best management practices on a scale that will produce measureable results we believe to be unfounded based on observations of past behavior.
16. Insurance subsidies should only go to farmers who embrace best management practices.
17. There should be a requirement that all streams be buffered.

Mike Delaney

1112 45th St. Des Moines, Iowa

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #264.

Timestamp 12/31/2012 11:30

**Name** Bob Hemesath

**City** Decorah

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I want to make a few general comments in favor of the Nutrient Reduction Strategy. I am support of voluntary nutrient and conservation practices. I utuilize all kinds of conservation practices including waterways, terraces, conservation tillage. I believe with the efforts of the nutrient reduction strategy we can utilize on a voluntary effort more of these practices.

We also utilize precision farming practices that accurately put nutrients and crop protection products where there are needed.

This strategy allows me as a producer to make more efforts to reduce the amounts of nutrients leaving my farm.

Thank you.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #265.

Timestamp 1/1/2013 7:01 PM

**Name** Jim Porterfield

**City** Martinsville

**State** Illinois

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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It is simply unprofessional that there is no mention, much less discussion, made in the Nitrogen Science Team's report of soil biology, humic and fluvic acids, foliar application of nutrients or nitrogen fixing azotobacter, balance of soil minerals beyond N&P or systems approaches using a combination of these practices.

I know there are farmers in Iowa that consistently produce over 200 bushel corn on less than 100 pounds of total applied N in C/C and have yield maps showing spots with 300+ bu/ac.

As an absentee Iowa land owner, and Watershed/Water Quality Specialist who has spent the last decade and a half working on nitrogen use efficiency and water quality, I will be mailing in 15 pages of comments.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #266.

Timestamp 1/1/2013 7:12 PM

**Name** Jim Porterfield

**City** Martinsville

**State** Kansas

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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It is simply unprofessional that there is no mention, much less discussion, made in the Nitrogen Science Team's report of soil biology, humic and fluvic acids, foliar application of nutrients or nitrogen fixing azotobacter, balance of soil minerals beyond N&P or systems approaches using a combination of these practices.

I know there are farmers in Iowa that consistently produce over 200 bushel corn on less than 100 pounds of total applied N in C/C and have yield maps showing spots with 300+ bu/ac.

As an absentee Iowa land owner, and Watershed/Water Quality Specialist who has spent the last decade and a half working on nitrogen use efficiency and water quality, I will be mailing in 15 pages of comments.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #267.

Timestamp 1/1/2013 7:50 PM

**Name** Mark Calmer

**City** Manson

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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My name is Mark Calmer. I live in Calhoun county and have a corn and soybean operation in Calhoun, Webster, and Pocahontas counties. I also own and operate an ag retail center, Manson Ag, Inc., and own and operate an ag drainage business, Wieston Ag, Inc.

For several years I have had many concerns about nutrient security. I believe every county should have two to three farmers and a county representative review committee to monitor run off, erosion, and nutrient security for the benefit of all.

Many little streams could be dammed for sediment and nutrient reduction at a minimal cost. This would create settlement basins that would be effective for erosion control, nutrient run off and beneficial to wild life.

Another severe problem is stream bank stabilization. I observe the loss of a foot of stream bank every year in the areas where I work. Rip rap would greatly improve that problem and there is ample availability to line the eroding areas.

I would be willing to serve on a committee to initiate a project like this. It is a shame to see our Iowa dirt wash away when it IS more managable.

**Name** Matthew Bormann**City****State****Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

I think the voluntary plan will work. On our own farm we are in year 2 of strip till for about half of our acres. The other half gets manure with conservation tillage. With new technologies such as, autosteer, GPS, and encapsulated urea nitrogen we have been able to cut back our nutrients and place them about 8" deep. At 8" that is right in place for the roots better utilize the nutrients. With a good tractor and autosteer you can plant right over these strips.

Also we have been installing more grassed waterways to filter surface runoff. There are many fields in this state that could use more water ways.

I feel where I live in Kossuth County if everybody would do a more timely job with placement of nutrients and have a better plan of what to put on in regards to crop yields and soil tests it would help.

Getting things back with tillage has been a recent fad in our area. Cutting back on tillage and better utilizing residue managing equipment with the planter would hold soil in place and cut the amount of down stream sediment and pollution during rainfall. Heavy tillage is big, especially with the amount of money people have made in recent years. More tillage does not equal better yields. Better management helps the environment and increases profits. Matthew Bormann

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #269.

Timestamp 1/2/2013 10:04 AM

Name Anonymous

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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I noted that the nutrient strategy document does not recommend a review of the DNR's manure management plan (MMP) program. While most programs for reducing non-point source pollution are voluntary, this program regulates nitrogen and phosphorus application of thousands of acres of farm ground in Iowa and therefore should be extremely relevant to the nutrient strategy.

The problem with the current MMP program is that it is outdated and results in over-application of nitrogen. The MMP program currently uses the outdated yield goal method for determining nitrogen application rates; this method is not supported by ISU and results in application rates significantly higher than what is recommended by ISU. I believe that the nutrient strategy should include plans to make the DNR's MMP regulations consistent with ISU nitrogen application recommendations.

Considering that the executive summary of the non-point source section of the nutrient strategy states that "For the nitrogen management practices that consider nitrogen rate, timing, or source, the rate of nitrogen application, and specifically, reducing the average application rate of nitrogen to the Maximum Return to Nitrogen Rate (MRTN) shows the greatest potential for nitrate-N reduction, putting the Department's MMP regulations in line with ISU recommendations seems like a good place to start on a non-point source nutrient strategy."

The implementation of ISU's current nitrogen application recommendations in MMPs would significantly reduce nitrogen application rates on manured fields, which, according to current research would reduce nitrate leaching into tile lines with no reduction in corn yields.

Name Mark Gibson

City Adair

State Iowa

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

Comments on Iowa Nutrient Reduction Strategy

To: Sec. Bill Northey, Iowa Department of Agriculture and Land Stewardship  
Charles Gipp, Director, Iowa Department of Natural Resources

Dear Secretary Northey,

Ecosystem Services Exchange, a venture focused on commercializing nutrient farming, appreciates this opportunity to comment on the Iowa Nutrient Reduction Strategy issued last month.

Nutrient pollution policies have been notoriously ineffective. Across the country, water quality regulation has focused on decreasing emissions from local sewer facilities, while purposely ignoring the real pollution sources (---often agriculture and other non-point sources immune from the Clean Water Act.) After billions of dollars of taxpayer funds are spent on sewer upgrades, little improvement in environmental quality is typically seen, and the regulatory cycle on these (largely) public facilities repeats itself & .again, with negligible environmental benefit. Breaking this cycle can be best accomplished by harnessing the State's expertise in agriculture and fostering emissions trading in water, as we have seen successfully implemented under the Clean Air Act. The potential cost savings that can be realized by redirecting mitigation investments to agriculture is non-trivial, as is the potential to increase farm income.

There are many constructive and precedent setting suggestions throughout the State's proposed Nutrients Strategy. The report's notion that Numeric criteria may not be the best approach for achieving reductions in nutrient loads, (page 6) is a critically important finding. The report's conclusion that a regulatory approach on nonpoint sources is not likely to achieve aggressive water quality outcomes (page 8) is similarly insightful. That Iowa is a national and global leader in the production of food and renewable fuels, so a goal of this strategy is to make Iowa an equal national and global leader in addressing the environmental and conservation needs associated with food and renewable fuels production& represents a formula for success, particularly if Iowa can demonstrate to the rest of the country how our agricultural industries can profit from innovative environmental compliance, while minimizing public/private compliance costs.

While this report is an impressive step forward, in order for the strategy to be successful, more impetus must be placed on encouraging and leveraging commercially driven solutions that materially improve environmental quality. The agricultural industry should be encouraged to compete in the environmental mitigation business, so that we do not continue to rely upon capital intensive end-of-pipe treatment and containment technologies that are ineffectual. A mix of efficient market-based, outcomes-oriented programs should be instituted which rely on private sector innovation over draconian command-and-control regulations.

The Strategy Threatens to Repeat History----With Questionable Outcomes

Across the country, municipal authorities and local governments operating drinking water and sewage facilities have been forced to attempt to clean up nutrient pollution that harms fish and fauna---even in cases where the local governments are not the primary cause of ambient water quality conditions. Since 2000, local governments have endured upwards of \$65 to \$80 billion in Federal Court Orders forcing new investment in capital intensive, centralized sewer treatment and containment facilities.1 To cite a few examples---- Kansas City is faced with a \$2.5 Billion order; Providence, Rhode Island has spent \$1 Billion on sewer containment; Ottumwa, Iowa (population 25,000) has already expended about half of their \$200 Million mitigation; St. Louis is enduring a \$4.7 Billion order.

In the Chesapeake where a population base across six states loads a cherished water body with nutrients, between 2001 and 2006 many of the 660 wastewater treatment plants here were directed to invest \$3 Billion in Biological Nutrient Reactors and other centralized, capital intensive nutrient mitigation schemes. The result: public utilities decreased their nutrient pollution by 40 to 60 percent,[1] with no discernible improvement in ambient water quality; and, yet another cycle of environmental litigation/enforcement threatens to force Maryland and Virginia local governments to expend another \$12 to \$24 Billion over the next five to 10 years.[2]

**Name** Mark Gibson**City** Adair**State** Iowa**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input checked="" type="checkbox"/>	<b>Point Source</b>

This pattern threatens Iowa.

Iowa's Nutrients Strategy anticipates over \$1.5 Billion in near term upgrades in wastewater and sewer collection investments, while more liabilities may be unfolding for public wastewater authorities. This investment will only reduce nutrient pollution loads by a pittance (4% reduction of all N loadings; 16% of P). Meanwhile, nonpoint sources (sic, agricultural)--- representing 80 percent of the nutrient loads--- will be mitigated with voluntary programs that will require \$100 Million to \$1 Billion per year in investments over decades.

Without improvements to the State's proposed strategy, the \$1.5 billion mandate facing local sewer authorities and industry will be followed by still more mandates for wastewater and sewer collection upgrades in the future. Taxpayers are headed towards subsidizing an unending spiral of bond-financed investments in capital intensive, end-of-pipe treatment and containment systems that will ultimately have a trivial effect on environmental water quality. We've got to find a better way.

Establish Commercial Solutions through Off-Sets and Water Quality Emissions Trading

The report provides precedent-setting scientific information on how specific agricultural based nutrient mitigation technologies and techniques have been proven to reduce nutrient pollution at a cost of 2X to 50X less than conventional, centralized capital intensive technologies. Yet the report fails to adequately address or layout the various paths that should be taken to minimize local government compliance costs by instituting all feasible pollution trading and offset mechanisms.

Under historic (federal) EPA nutrient policies no mechanisms have evolved that allow public utilities to materially minimize their environmental compliance costs by contracting with agriculture to reduce nutrient loading. Yet mitigating environmental impacts through off-set investments has been a standard operating procedure under the Clean Air Act for the private sector.

It is time to create off-set programs that foster least-cost market-driven solutions under the Clean Water Act that can minimize public and private costs. We have an opportunity to establish new markets and revenue streams for agriculture while simultaneously minimizing public environmental compliance costs. Similarly, an NPDES permittee should be allowed to minimize compliance costs through offsets and pollution reduction pooling among permittees. (i.e., pointsource to pointsource trading).

To establish such precedents, it is essential that we understand why such efforts have been met with marginal success in other States.[3] Many factors have plagued the prospects for using commercially-driven water quality trading:

Preoccupation with the creation of centralized command-and-control banks that would somehow monetize environmental investments and their effects. Preoccupation with a cap and trade style trading programs that do not treat water bodies (with or without TMDLS) equally.

Lack of measureable, proven non-point source mitigation techniques/technologies.

Trading ratios that dilute the effectiveness of NPS (agricultural) mitigation techniques/technologies, negates their economics and encourages condemnation of agricultural land.

Presumption that off-set or trading agreements cannot be consummated without a TMDL.

Legal threats concerning Clean Water Act compliance issues such as anti-backsliding.

Uncertainties created by exogenous affects, including flow (rainfall) rates and substrate, sunlight, diurnal trends, bioavailability and natural carry capacity.

Name Mark Gibson

City Adair

State Iowa

Providing comment on the following sections:

<input checked="" type="checkbox"/> Executive Summary	<input checked="" type="checkbox"/> Nonpoint Source
<input checked="" type="checkbox"/> Policy	<input checked="" type="checkbox"/> Point Source

These issues, notwithstanding unfunded mandates, are appropriately within the purview of the States, just as adjudication of non-point sources is purely the responsibility of the States.

Recommendations Summary

In order to meet nutrient pollution reduction targets at minimal risk and cost, the State should:

- Encourage and promote nonpoint source to pointsource, and pointsource to pointsource emissions trading and offset agreements, without creating centralized banks or trading bureaus.
- Allow emissions trading and offsets, under existing laws, utilizing modern verification techniques and avoiding trading ratios, or similar measures that encourage farm land condemnation.
- Immediately allow all NPDES permit holders to reopen and revise their permits in order to establish nonpoint source and pointsource to pointsource mitigations.
- Create a commercially based Industrial Advisory Panel to provide the State with ongoing information and expertise on least-cost environmental compliance solutions.
- Undertake multiple and diverse pilot projects, codifying environmental mitigation offsets in NPDES permits.
- Manage and arrest future need to regulate point sources.
- Avoid best practice mandates on agricultural producers. No minimum level of nutrients management practices should be regulated. Nutrient mitigation practices and programs should be voluntary or market-driven.

Thank you for your time and consideration.

Sincerely,

Mark Gibson

mark@ecosystemservicesexchange.com

Ecosystem Services Exchange

Adair, Iowa Denver, Colorado ST. Petersburg, FL Washington, DC

Footnotes

1. Testimony of Barbara Biggs, Government Affairs Officer, Metro Wastewater Reclamation District Denver, Colorado; Water Quality Chair, National Association of Clean Water Agencies, Subcommittee on Water Resources and Environment, House Transportation and Infrastructure Committee, U.S. House of Representatives, June 24, 2011. Proceedings from the Washington College Annual State of the



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **4** of comment #**270**.

**Timestamp** 1/2/2013 10:48 AM

**Name** Mark Gibson

**City** Adair

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Chester forum, 2012.

2. "States Working to Refine Cost Estimates for Tributary Strategies", Chesapeake Bay Journal, August 2004. □ Chesapeake Bay TMDL Watershed Implementation Plan: What Will it Cost to Meet Virginia's Goals? SENATE OF VIRGINIA, Senate Finance Committee Report, November 18, 2011.

3. □ Controlling Nutrient Loadings to U.S. Waterways: An Urban Perspective, National Association of Clean Water Agencies, March 2012 Report.

4. Letter to Denise Keehner, director of EPA Office of Wetlands, Oceans, and Watersheds, from NACWA Executive Director Ken Kirk, July 20, 2012. □ EPA Urged to Expand Water Quality Trading, Include Pollutants Other Than Nutrients brief.

**Name** Chris Hornback  
**City** Washington  
**State** District of Columbia

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input checked="" type="checkbox"/>	<b>Point Source</b>

January 2, 2013

Nutrient Reduction Strategy

ANR Program Services

2101 Agronomy Hall

Ames, IA 50011-1010

Re: Iowa Nutrient Reduction Strategy ☐ Comments

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to comment on the State of Iowa's Nutrient Reduction Strategy released in November 2012. NACWA represents more than 280 public wastewater treatment utilities across the country, including several in Iowa. Nutrient issues are a top priority for NACWA and its public clean water agency members. Nutrient-related impacts are arguably the top water quality challenge currently facing our nation's waters and NACWA is committed to working toward science-based and rational approaches that will help achieve water quality standards in a cost effective manner.

NACWA commends Iowa for taking a multi-faceted approach that seeks to address both point and nonpoint sources. NACWA's members in Iowa, and nationwide, recognize that wastewater treatment plants are an important part of any nutrient reduction effort and stand ready to do their fair share. Indeed, many of the gains in nutrient control made to date are because of the investments and efforts already made by publicly owned treatment works (POTWs). By crafting balanced nutrient management plans, states can ensure that the point source community, including POTWs, is not disproportionately burdened.

The Iowa Nutrient Reduction Strategy is being released into a national regulatory environment that is highly focused on how states will address, or are currently addressing, nutrient pollution. The U.S. Environmental Protection Agency (EPA) and national environmental groups have been paying special attention to mitigating nutrient pollution in some of the country's most important and complex water bodies, such as the Chesapeake Bay and Mississippi River Basin. This has, in turn, focused attention on the states that contribute to these national water systems. Recent efforts at the state

level provide promising examples of how the challenge of controlling nutrients, even where numeric nutrient criteria have not been developed, can be handled nationally.

While NACWA acknowledges the Iowa Strategy's approach to nonpoint sources is a good first step, it nevertheless underscores the limitations of the current authorities in the Clean Water Act to address all sources of nutrients. Without clear federal authority to regulate nonpoint sources, provisions in the Strategy address agricultural runoff in a voluntary manner. The accountability and verification measures highlighted for these practices remain vague. In the absence of permit tracking, as will be used for the point source community, the strategy should clearly identify the tracking and reporting methods for the nonpoint community. Additionally worrisome, the funding sources for agricultural water management programs noted in the strategy, are shrinking ☐ and NACWA is not confident that the Strategy does enough to address the reality of the available funding for the suggested agricultural practices, and how that will affect the nonpoint community's ☐ voluntary participation.

Within the constraints of the Clean Water Act, the Iowa Nutrient Reduction Strategy focuses on reducing nutrients from both nonpoint and point sources in ☐ a scientific, reasonable and cost effective manner. NACWA applauds the State's efforts to attempt to address both point and nonpoint sources of nitrogen in ways that more equitably distribute the responsibility for improving water quality by reducing the release of nitrogen and phosphorus. Recent nutrient reduction efforts in other parts of the country have disproportionately sought reductions from POTWs because those reductions are more certain and quantifiable. In an effort to make reductions and show progress, point sources are being pressed to remove nutrients to the limits of technology and still face further reductions through backstop provisions if nonpoint source reductions are not made. Iowa's Strategy, on the other hand, recognizes the relative contributions from the point and nonpoint source communities and offers a reasonable and clear path forward for the point source community. In addition, NACWA strongly agrees with the Strategy's authors that flexibility through watershed prioritization and opportunities for future water quality trading are important elements.

## Iowa Nutrient Reduction Strategy

Online comment submissions

Page 2 of comment #271.

Timestamp 1/2/2013 11:38 AM

**Name** Chris Hornback  
**City** Washington  
**State** District of Columbia

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input checked="" type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input checked="" type="checkbox"/>	Point Source

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Iowa's strategy clearly indicates how the technology-based nutrient requirements will be implemented within the clean water community, providing POTWs with greater certainty in terms of their long-term investments. Based on the National Pollutant Discharge Elimination System (NPDES) permit cycle, future POTW permits will specify technology based limits, guaranteed to not be more stringent than 10 mg/l total nitrogen (TN) and 1 mg/L total phosphorus (TP). Furthermore, these limits will not to be made more restrictive for a period of at least 10 years once the nutrient reduction process is installed. The proposed TN and TP limits are reasonable and achievable and also reflect the clean water community's relative contribution of nutrients to Iowa's waterbodies. By providing assurance to the POTWs that the biological nitrogen removal treatment (BNR) technology approved in the permit will be in compliance for a certain period of time, POTWs will have the confidence they need to make the investments necessary to meet their permit requirements. POTWs must have certainty that they will not be asked to do even more in the next permit cycle, before any concerted effort has been made to address other sources.

NACWA appreciates the opportunity to provide these comments. Please do not hesitate to contact me at [chornback@nacwa.org](mailto:chornback@nacwa.org) if you would like to discuss any of these comments further. NACWA appreciates Iowa's leadership on this issue and looks forward to continuing to voice the clean water community's perspective in the evolving national conversation surrounding nutrient reduction.

NACWA's comments will also be submitted via mail.

Sincerely,

Chris Hornback  
Senior Director, Regulatory Affairs

**Name** Denise Schwab**City** Belle Plaine**State** Iowa**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

First, the leadership and committee need to be commended for their work. The combination of both point and non-point sources and the science-based approach are both huge strengths to the strategy, as well as the voluntary approach.

I am both a farm wife, and work professionally with beef producers, so my comments come from both perspectives. We no longer have a cow herd, having lost our rented pasture to the CRP creek buffer program, but I still think like a cattle producer. While most of these strategies focus on corn and soybean production, I would like to add some comments from the livestock perspective, specifically ruminants.

According to an ISU study funded by the Coalition to Support Iowa Farmers, livestock and poultry production contributes nearly \$1.1 billion to household income and generates 43,000 jobs in Iowa. When meat processing is factored in, research shows a contribution of 80,000 jobs to the state with a total economic value of \$19.5 billion in Iowa. Iowa's history of leading in the livestock industry is based on our efficient system of producing feed to raise livestock, and recycling nutrients to grow more feed - a complete production system. I encourage the committee to consider the additional economic advantages to this livestock-crops-system approach as you move forward to implement this strategy.

Several of the nutrient reduction strategies can have a positive effect on growing, or at least maintaining, the cattle industry in Iowa. Growing cover crops not only protects the soil from erosion and utilizes unused nutrients, but it can also produce 1 to 3 tons/acre of winter and early spring grazing or stored feed if cattlemen are allowed to harvest the forage prior to the next grain crop. Grazing recycles the nutrients removed by the cover crop to be available for the following grain crop. Mechanical harvesting moves those nutrients to other fields that may have a greater need for additional nutrients. Cover crops also fit in the double-cropping growth-mindset that US Secretary of Agriculture Vilsack discussed at the December 6 Farm Journal Forum, where he spoke about the need for a new vision for US agriculture.

Buffer strips remove nutrients filtered through the root zone, reduce streambank erosion, but can also produce 1-3 tons/acre of forage for feed if producers are allowed to harvest. Harvest restrictions which delay first cutting have a significant negative impact on the quantity and quality of forage produced. While wildlife habitat is important, producing feed for the cattle industry is also economically important to Iowa. A significant amount of Iowa's pasture ground is along streambanks, where flash flooding and winding switchbacks make crop farming difficult. However, if farmers are forced to put buffers along all streambanks we will see a further reduction in the amount of pasture land, just like we saw when the CRP program accepted streamside buffers. However, if they can fence off the buffer strips along streams but still harvest them for hay, some producers may consider rotationally grazing more productive pasture land and haying along the streams.

Extended rotations, grazed pastures and perennial cover are all practices that can support the cattle industry in Iowa, and will likely be more quickly adopted and applied by livestock farms. Even wetlands may have application to providing water sources for pastures and rotationally grazed systems, if we encourage producers to look at new and different alternatives to utilize forages.

Several times the discussion on extended crop rotations discussed the need for livestock to utilize the forage from extended rotations. If properly incentivized, I feel the entire strategy can support and encourage cattle (and other ruminant) production to grow in Iowa rather than shrink. Changing the RMA rules to allow double cropping of winter annual cover crops, haying all or 2/3's of buffer strips, pasture or perennial forages on the steepest slopes, and no penalties to harvest forages are all possible scenarios to encourage rather than eliminate cattle production in Iowa.

These type of incentives also provide an opportunity for young and beginning producers to enter agriculture in Iowa. With an economic multiplier for livestock production of 1.6, the Iowa Nutrient Reduction Strategy can both protect our water quality AND grow the agriculture and livestock industries in Iowa.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #273.

Timestamp 1/2/2013 1:26 PM

**Name** Doug Gronau

**City** Vail

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I support the Iowa Nutrient Strategy. The reasons: it is the only strategy that is voluntary with cost share available; it prioritizes areas that are the most troublesome as far as nutrient problems; it is not a one size fits all concept, I know on my farm that situations are much different than in other parts of the state; mandatory standards are basically not enforceable because it would create a whole new bureaucracy and create standards that are not achievable because they would be statewide.

**Name** Edward McPartland**City** Johnston**State** Iowa**Providing comment on the following sections:**

<input type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

A CAR WITHOUT A MOTOR

I once had an automobile that was spacious and comfortable, but had a very poor engine that didn't run well. This plan reminds me of that car. It is an elaborate plan with many good solutions that is not going anywhere. The history of voluntary regulation is not encouraging with regard to action-oriented solutions. Although a few, close-knit industry associations have set standards for their trade group with some success, most voluntary regulations as a substitute for government regulations have been a prescription for inaction and seem to be designed as political cover for that inaction. The recent financial crisis was in part caused by the failure of some voluntary regulations and the lack of enforcement of involuntary regulations. Farmers are often known for their individualism and are probably not going to agree on enough land treatment to significantly reduce non-point pollution in Iowa waterways.

In most states, the water in rivers and lakes are part of the commons, a resource supposedly owned by society and managed for the benefit of everyone. In the nutrient reduction strategy for Iowa, the taxpayers and ratepayers will foot the bill to clean up point pollution of Iowa's waterways. However, since most of Iowa's waterways pollution is non-point, a program of inaction will allow a minority of landowners to continue to pollute a resource (the commons) that is needed and used by the rest of society. It is, in effect, an indirect subsidy to polluters who need not act or bear the cost of their own pollution. This problem will become more acute as water shortages develop as a result of drought conditions. Several years ago, the Des Moines Water Works had to stop taking water from the Raccoon river because the algae blooms were so bad, it was too difficult to purify the water. During the most recent drought, the director of the Des Moines Water Works commented that the water flow was so low that the treatment plant was mostly treating chemicals. There was also talk about possible restrictions on water use. If water shortages continue and restrictions are necessary, and if stream water is too polluted to treat, many more people will start paying attention to this problem and asking why there isn't a real solution in place.

Additionally, I find it difficult to conclude that this is a serious proposal to deal with non-point pollution when there appear to be no standards or benchmarks in place to even measure the problem. How much nitrogen and phosphorous should be in the water? I guess that we are not going to know or are not supposed to know. Perhaps ignorance is bliss, but it won't be if we run out of treatable water. The McDonough School of Business at Georgetown University cites a study by Jodi Short and Micheal Toffel entitled "Robust Enforcement Should Complement Voluntary Regulation." The idea seems to be that there should be several stages of regulation which might include standards and some backup regulations when voluntary measures fail. In other words, there should be some consequences for a complete lack of cooperation. There does need to be some flexibility and sophistication as different types of land and land owners may need different and varied solutions to accomplish significant results. However, in the absence of more substance in voluntary action part of the non-point program, the real title of the program may end up being the "Freedom to Pollute."

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #275.

Timestamp 1/2/2013 3:16 PM

**Name** Kevin Wilbeck

**City** Rippey

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**  **Nonpoint Source**  
 **Policy**  **Point Source**

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I have read the Summary and portions of the entire document. It appears that the same excuses used by the agriculture industry to support voluntary participation could also apply to the variety of wastewater facilities being mandated to participate. What happens if the reduction targets are not met? More waste water treatment plants?

I believe that Iowa's water quality problems stem mostly from our inability to find effective non-point source reduction participation. Acting as if agriculture isn't a major contributor won't do it. Acting as if Iowa is still filled with family farmers who participate in voluntary programs because they care about their local environment won't do it. Thumbing our nose at federal laws to the point where the EPA is threatening a DNR takeover won't do it. Waiting for the Gulf Coast fishing industry to get smart enough to sue Iowa won't do it.

God bless the bounty and economic contribution of the agriculture industry. But let us also recognize its REAL contribution to nutrient pollution so that an appreciable reversal of Iowa water quality can be achieved. This strategy falls short. We can do, and Iowans deserve, much better. Thanks for listening.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #276.

Timestamp 1/2/2013 5:03 PM

**Name** Nancy Miller  
**City** Lime Springs  
**State** Iowa

**Providing comment on the following sections:**

<input type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input checked="" type="checkbox"/>	<b>Point Source</b>

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I would like to believe I live in a state that is committed to being part of the solution not part of the problem. We all are aware that what we dump into our rivers and streams eventually will make its way on down our waterways. I would ask that you take a better, more detailed look at what each of us can do to help improve the health of the gulf, as well as our own waterways and those inbetween. Then after careful and genuine study make some real definite plans and changes to the way things are done, to actually insure better health of our waterways and hopefully for the gulf as well.

I find it shameful that we cannot even eat fish out of most of our rivers.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #277.

Timestamp 1/2/2013 7:32 PM

**Name** Nick Leibold  
**City** New Hampton  
**State** Iowa

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

Comment RE the Iowa Nutrient Reduction Strategy:

I am a farmer in Chickasaw County, and want to express my support for your nutrient reduction plan. I think it is important that the plan has a science based approach, and that it has voluntary participation for farmers, instead of mandatory regulations. Iowa has many different regions and soil types, and what works one place may not be the best plan for other places within the state. Nutrients are a necessary part of crop production in Iowa, and with the high costs of buying fertilizer, I think most farmers would prefer to not lose their nutrients, so it is natural that farmers would want to conserve their soil and nutrients.

I have participated in several NRCS programs (CSP and CRP) over the years in an effort to do my part in protecting our water and soil resources. The practices I use includes the following: installing terraces, grass waterways, grass filter strips along streams, GPS controlled spraying to reduce overlaps of chemicals and fertilizer, grid soil sampling followed by variable rate fertilizer applications to put the right amount of fertilizer in the right places to maximize not only return on investment but also reduce the chance of losing excess nutrients to the environment, spring and fall nitrate tests for corn, no till and reduced tillage, cover crops, split application of nitrogen and reducing fall application, and reducing overall nitrogen rates.

I have participated in numerous testing experiments thru the ISA On-Farm trials to help fine tune the management of nitrogen fertilizer, but it is important to remember that the variable weather we get in Iowa can have drastic effects on nitrogen management. There can be many factors involved with nutrient management, and varies from year to year.

In the future, I want to try strip tillage that includes fertilizer placement in bands, in the row where the crop will be planted, in order to improve the nutrient efficiency, and maybe reduce fertilizer rates. I also plan to include more cover crops on my farm to reduce the possibilities of soil eroding into streams. It is important that NRCS continues to get cost share funds to help producers like me to try new technologies and ideas. NRCS has been a valuable asset to my farm operation by providing technical and financial assistance in my efforts to reduce erosion and nutrient runoff.

In conclusion, I believe that the voluntary nutrient strategy that has been developed is the best route that Iowa has to go forward in efforts to protect Iowa's water and soil resources. Thank you for letting me comment on the proposal. I think farmers and other stakeholders would be well served with this strategy.

Sincerely,

Nick Leibold

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #278.

Timestamp 1/2/2013 8:26 PM

Name Tim Recker

City Arlington

State Iowa

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

Iowa's Nutrient Strategy Comments

December 30, 2012

The Land Improvement Contractors of Iowa applaud the efforts of the Nutrient Strategy committee. The Iowa LICA is a group of 400 contractors that put conservation programs and practices in place on Iowa's fertile landscape.

Iowa is the leader in food, fiber and fuel production. Iowa farmers and LICA contractors work together every day to implement conservation practices on Iowa's working ground. If Iowa wants to be leader in conservation, they need to invest in technology similar to how agriculture has invested in technology. This investment in conservation technology needs to accomplish two things; first it must allow a faster delivery of conservation plans and design. Farmers do not want to wait months for a design specification. Secondly, conservation technology needs to simplify the process in order to engage the private sector in conservation planning. We need software that the private sector can implement in days instead of months or years.

The nutrient strategy calls for increasing the delivery of conservation and non point source programs in a straightforward and flexible manner. Iowa farmers and contractors understand practices available for nutrient reduction but lack technical support for non cost share programs.

Fortunately, we have a home grown company that is on the cutting edge of conservation technology. Agren, located in Carroll, Iowa has been developing software for the last 6 years that speeds up and simplifies the process of conservation planning and design. What now takes hours and days to design can be done in minutes, and is simple enough to attract private businesses to begin providing services.

The Iowa Land Improvement Contractors Association has reviewed Agren's tools and support this technology. It is cutting edge technology that would speed delivery of conservation services and get more conservation practices implemented.

Currently government offices cannot keep pace with requests for conservation practices. Every day Iowa LICA members receive requests from Iowa farmers to build waterways, before having a proper design. Farmers are not willing to wait months or years for those designs. With this new software waterways can be developed in minutes. Along with the traditional paper designs for waterways, the Agren software can provide an electronic file that contractors can load in to their blade control systems and build waterways with very little additional assistance.

Putting new technology in the hands of existing staff is far more cost effective and efficient than hiring new staff. The combined agencies of IDALS, IDNR, and NRCS need to take advantage of Agren's software development by forging a public-private partnership with Agren to develop a full suite of conservation planning tools that will increase the rate of delivery and allow the private sector to offer conservation services.

Sincerely,

Tim Recker

President of Iowa Land Improvement Association

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #279.

Timestamp 1/2/2013 9:32 PM

**Name** Gary Zhorne

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

Considering what has gone on with the Chesapeake Bay project over the last 20 years its easy to see that we don't want to go down that road here in Iowa. It seems that the E.P.A. has been using a "shot in the dark" aproch in soulving the problems there. I have not herd or seen any results saying that they have achieved any solutions. We need science-based Nutrient Reduction Strategy as developed by I.D.L.S.using Iowa State University reasurch along with voluntary conservation practices. There is also a need to maintain agricurtlural production. In my part of the state water-ways and farmable tarraces seem to do a very good job of keeping our soils in place. Cover crops would also help keep N from leaching. Gary Zhorne

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #280.

Timestamp 1/3/2013 7:26 AM

**Name** Dan Chism  
**City** Emmetsburg  
**State** Iowa

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input checked="" type="checkbox"/>	<b>Point Source</b>

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My name is Dan Chism and I am a grain farmer from Emmetsburg, IA. I have also owned and operated a commercial truck wash in Emmetsburg.

In my farming operation, I use swine manure, chicken manure, and commercial fertilizer. I am trying to be the best steward of the land I can be, as are my friends and neighbors. However, there are always things we can improve on and I strongly believe that is what Iowa's Nutrient Reduction Strategy can allow us to do. I was just at a meeting a month ago in Des Moines and heard Iowa's Secretary of Ag, Bill Northey, and Matt Helmers from ISU speak on behalf of this program. Just in the one hour I sat in that program, I picked up some very valuable information I could take home to my own operation. Iowa and agriculture are trying to be proactive here.

In the presentation I attended the topic of city sewer plants came up. I believe the idea of trading credits with crop land farmers came up, and I think that is a great idea. When I ran my truckwash, which is now closed, we did a lot of livestock washouts and we used the city sewer for our discharge. We separated the solids on site and sent the liquid to the city's waste water treatment plant. That worked for about six months, then we started having problems with ammonia and BOD. The city did not want to spend the money to fix their sewer and I did not want to build a lagoon, so I closed my wash over a year ago. I believe this is a classic example of where a city could trade credits with a rowcrop farmer to reduce the burden of their discharge. I don't know exactly how that is done, but I think it is a great idea.

In closing, I strongly encourage you to please give Iowa's Nutrient Reduction Strategy a chance. We can all do things to improve leaching and runoff of our nutrients, and collectively that is what we are trying to do here.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #281.

Timestamp 1/3/2013 8:02 AM

**Name** Ryan Lemke

**City** West Des Moines

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I strongly support the entire nutrient reduction strategy as it is written.

Name Kellie Blair

City Dayton

State Iowa

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

- 
1. I am thankful that the State of Iowa has come together to help get this science-based study started before we are regulated on the topic with no good data to back it up. If we are not able to do this voluntarily, at least it is a warning of what the Government will come up with down the road.
  2. Voluntary efforts are difficult in this agriculture environment because prices right now are driving farmers to farm anything they can. Conservation is not in the mindset right now (unfortunately), but how do you keep this a voluntary effort?
  3. How are you going to keep environmental activist groups from trying to force the agriculture industry to do ALL of the listed best management practices? They seem to think we ought to be doing anything we can, even if it does not apply or even help (for example: no till in central Iowa soils is not an option for some rotations).
  4. How should farmers find the most efficient method of non-point source nutrient reduction? Will the goal focus be primarily on nutrient application or land management? How will it be decided whether or not implementations are adequate, and WHO decides whether or not implementations are adequate?
  5. I believe more education on how farmers affect the environment is necessary.
    - a.  I've already heard people talk about how  cities are the problem and if  this Hypoxia thing is really REAL.
    - b. How do you get farmers to believe this is also their issue?
  6. How would the program go about educating Iowans? Since this initial strategy is voluntary, what incentive does a person have to attend a seminar, meet with an expert, follow a recommendation, etc.? And again, who is in charge of education/setting a standard/deciding what works, and what doesn't?
  7. Attempt to train all of the fertilizer dealers and implement dealers so they at least have a decent understanding about the Nutrient Reduction Strategy and can try to relay that to their customers when developing nutrient and tillage programs.
  8. Train all the county Soil and Water Conservation Districts and county NRCS offices so they are well-versed on the Strategy and can make proper recommendations and utilize their resources towards the goal as efficiently as possible.
  9. Specific areas/watersheds/landform regions of the state would need to be prioritized first. Focus on those watershed areas that could benefit the most and concentrate the Nutrient Reduction Strategy efforts and funding there. However, even within these regions, farming and management practices can differ across a fence line. Setting a plan for each individual farmer/tenant isn't practical but would creating a blanket plan across a specific area be more practical, or not, since there can be such great variation?
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  12. How should progress be rewarded (incentive)? How could a recognition program be in place for those farmers meeting and exceeding the Nutrient Reduction Strategy recommendations?

## Iowa Nutrient Reduction Strategy

Online comment submissions

Page 2 of comment #282.

Timestamp 1/3/2013 8:26 AM

**Name** Kellie Blair

**City** Dayton

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                               **Point Source**

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13. Educate grain and livestock buyers so they are aware of the Nutrient Reduction Strategy and its recommendations. Investigate if they are willing to implement preferential treatment towards those producers following the Nutrient Reduction Strategy.

14. Educate land owners who rent out their farmland. Since much of the land in Iowa is rented out, what incentives do the tenants have to implement Nutrient Reduction Strategy recommendations, especially if they do not even know if they will be farming the land the next year? The landowners are going to have to be willing to demand this from their tenants, but also be willing to take some decreased rent or contribute to the conservation practices. Develop and make available example farm leases that apply reasonable Nutrient Reduction Strategy recommendations for that type of land.

15. How could we manage the cost of these improvements? Are non-point sources expected to voluntarily foot the bill for any management improvements/nutrient application reduction consequences? What are consumers willing to sacrifice in order to implement this strategy (higher food prices)?

16. How could the success rate of this strategy be measured? If all specific issues aren't addressed or managed, is the program a success or failure? How long would it even take for a noticeable difference/ability to measure progress?

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #283.

Timestamp 1/3/2013 8:57 AM

**Name** Janet Ferguson

**City** St. Louis

**State** Missouri

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Thank you for the opportunity to comment on this strategy, the Nutrient Reduction Strategy.

My comments will be general, in favor of this approach of reducing nutrients that reach the Gulf Waters in order to promote an ecological balance of marine life in the Gulf of Mexico.

I believe we must all work together, up and down the Mississippi River, to achieve this goal.

Please seek ways for more citizens to become involved in these issues! Thank you.

Janet Ferguson



**Name** Nancy Bohl Bormann**City** Lu Verne**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

## Comments/Questions/Issues with the Study:

1. We are thankful that the State of Iowa has come together to help get this science-based study started before we are regulated on the topic with no good data to back it up. If we are not able to do this voluntarily, at least it is a warning of what the Government will come up with down the road.
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5. Why is agriculture the only addressed source of non-point source pollution addressed in the report? By ISU's own admission there are other non-point sources that have not been addressed in the report. ISU cited erosion of stream banks containing legacy phosphorus buildup as one other major source. It appears that agriculture is being singled out. How can any significant reductions be achieved if ALL sources are not addressed and the burden of reduction be unfairly laid on just a few sources.
6. With regards to the land valuation that is to be taken out of production for buffer strips and wetlands, that land is being under-evaluated by the report and is lowering the cost of implementation. The report used ISU average cash rental rates as the cost to take land out of production. However, farmers and landlords will tell you that the ISU rental rates are low and do not reflect the going current rate for farmland rental. Plus on top of this low rental rate being used, the report failed to account for the lost profit potential on those acres taken out of production.
7. The report suggest that part of nitrate run off reductions could be achieved using the Iowa State University Extension Nitrogen rate calculator to determine the Maximum Return to Nitrogen(MRTN). It is unrealistic to expect farmers to reduce the nitrogen application rates to what amount to a rate for an average yield. After all average yields are set by the extremes, both high and low. Farmers have to apply fertilizer for the maximum crop yield possible in order to feed the world and be competitive in the market place.
8. The report appears to partially ignore point source pollution. Why does it affect only the 130 largest point source polluters? If we use this same logic for non point-source polluters then should this report only affect the 130 largest farmers in the state? Yet it seems that this report is intended to be a guide for every farmer in the state. Point source and non-point source polluters are not being held to the same standards. It is much easier for the point source polluters like municipalities to implement changes because they can bill their customers directly for the new costs incurred. Farmers cannot do that!
9. Regardless of which set of management practice changes would be adopted from the report to be used to reduce non-point phosphorus and nitrogen run off to the desired goals, the cost is staggering. There is no way that farmers can be expected to use any of the suggestions from this report if they are ultimately expected to bear the costs themselves totally. In a more average farm economy that has substantially lower and more normal profit margins, the costs of these new practices could actually be the difference between a loss or profit on a lot of operations with a rented land base. If the public feels that non-point phosphorus and nitrogen run off is a concern, then they will have to be willing to pay increased food costs at the grocery store.

## Comments/Questions/Issues on Strategy Implementation:

10. I believe more education on how farmers affect the environment is necessary.
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  - b. How do you get farmers to believe this is also their issue?

**Name** Nancy Bohl Bormann**City** Lu Verne**State** Iowa**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input checked="" type="checkbox"/>	<b>Point Source</b>

- 
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# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #285.

Timestamp 1/3/2013 12:11 PM

Name Vance Hjelm

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

Yes! Finally a science-based nutrient strategy for voluntary practices in Iowa that include all stakeholders in our effort to conserve soil and water quality and still maintain agricultural production! I've said for years that I don't understand why we aren't all in agreement about putting our heads TOGETHER and working on any problems, instead of always sniping at the so-called "others."

Our family has put soil conservation and water quality practices into effect such as taking out intakes and installing french drains, fencing around our swamps to keep cattle out, tiling to improve drainage and at the same time increase the absorption of the farmed land, and using minimum and no-till practices to decrease soil run-off. Even though we don't have much highly erodible land, the use of a cover crop in the fall is an option we are looking at for future use.

Thank you for your efforts to install a voluntary and science-based strategy for the reduction of nutrients lost in Iowa. Vance Hjelm

Name Samantha DeWitt

City Gladbrook

State Iowa

Providing comment on the following sections:

<input type="checkbox"/> Executive Summary	<input checked="" type="checkbox"/> Nonpoint Source
<input checked="" type="checkbox"/> Policy	<input type="checkbox"/> Point Source

## Comments/Questions/Issues with the Study:

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## Comments/Questions/Issues on Strategy Implementation:

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# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 2 of comment #286.

Timestamp 1/3/2013 1:06 PM

Name Samantha DeWitt

City Gladbrook

State Iowa

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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21. How could the  success rate of this strategy be measured? If all specific issues aren't addressed or managed, is the program a success or failure? How long would it even take for a noticeable difference/ability to measure progress?

**Name** Eric Jellum**City** Osage**State** Iowa**Providing comment on the following sections:**

<input type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

Can we come together to evaluate all of our concerns and compile a ranking of practices that most effectively and economically address as many objectives as possible? In much of the Corn Belt soil is being lost at a higher rate than it is being regenerated. It is critically important that we preserve our agricultural production capacity by promoting and providing financial incentives to protect our soils. Of course we cannot do that at the expensive of our downstream environment as we are doing now. So your efforts to evaluate cost-effective practices to reduce nutrient flow off our fields is critically important as well. In addition, the changing climate will likely make erosion, runoff, and flooding events more severe. The models being developed by the Iowa Flood Center to evaluate flood mitigation strategies and buffer the flow of water through our watersheds are comparable to what your group has done for nutrient flux reduction. A list of practices intended to reduce nutrient loss to the Gulf of Mexico should be compared to similar lists for protection of soils or flood mitigation or wildlife habitat enhancement so that the practices that cost-effectively address all of the concerns simultaneously when possible can be identified. For example, tillage practices and cropping systems that keep soil in place will not only maintain soil quality but will keep eroding soil from filling up streams and rivers. Wetlands could be designed better with flood control in mind. Better buffering of water quantity through the stream and river system would decrease the amount of resuspension of stream bank and bottom sediments that may have pronounced effects on phosphorus flow to the Gulf of Mexico. Wetlands might get a higher ranking than biofilters because they also settle sediment, mitigate flooding, and provide wildlife habitat in addition to denitrifying tile drainage. Cover crops, contour tillage, and perennial crops might get higher rankings than edge of field practices because they also help to keep soil in place and in good health. Some measures may impact only water quality but be so cost-effective that they would still rank high. Changing P fertilizer sources from DAP or MAP to TSP (or a comparable liquid fertilizer) would have pronounced impacts on water quality since most P fertilizer is fall applied, and the accompanying N is often ignored in producer's N fertilizer budgets. A concerted effort to change demand to this end should eventually effect the necessary supply side changes in the fertilizer industry. A campaign to convince producers and landowners that maintaining soil P levels in the optimum range is not mining the soil and convincing producers to apply P below the soil surface whenever possible should also have big impacts on water quality at very little cost. These behavior changes would cost farmers and taxpayers essentially nothing

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #288.

Timestamp 1/3/2013 1:29 PM

**Name** Curt Zingula

**City** Central City

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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It's crucial that conservation education be a foremost priority! Two of the best nutrient reduction strategies are tile outlet bio-filters and cover crops. With many farmers unfamiliar with bio-filters, it would be foolish to expect that thousands of 70, 80, and 90 year old absentee landowners will consider installing such.

Cover crops are also misunderstood. I noticed several of my neighbors tilling their ground bare in order to plant COVER crops. Going into winter, those crops were nothing but 2" hairs expected to protect the soil from melting snow and early spring rains.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #289.

Timestamp 1/3/2013 2:27 PM

**Name** Brad Johansen

**City** Decorah

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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To whom it may concern,

The following taken directly from the Executive Summary

The Iowa Nutrient Reduction Strategy is a science and technology--based approach to assess and reduce nutrients delivered to Iowa waterways and the Gulf of Mexico. The strategy outlines voluntary efforts to reduce nutrients in surface water from both point sources, such as wastewater treatment plants and industrial facilities, and nonpoint sources, including farm fields and urban areas, in a scientific, reasonable and cost effective manner.

Under know circumstances should this be voluntary. I believe good science does and should lead to good data driven decision making. I believe good science must be independently peer reviewed and free of political bias. If we know what the best practices are for each ecotype or watershed or even at a springshed level we should make it mandatory. Do not kid yourselves. The worst stewards are not volunteering to change there poor practices.

Thanks for your efforts,

Brad Johansen



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #290.

Timestamp 1/3/2013 3:06 PM

**Name** Dianne Grayu

**City** Washington

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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My understanding is that the number of small cities/towns with little or no sewage treatment is quite significant. According to your strategy and assessment, only the larger sewage plants make a significant contribution to the nitrogen and phosphorus in the water. I find it hard to believe that raw sewage from hundreds of small point sources would not be making a significant impact on the water. What are other states doing about small communities (population in the hundreds or less) that find sewage treatment "unaffordable"? How can we expect people on farms to make sacrifices to improve water quality while lots of small towns are contributing untreated or hardly treated sewage into the streams?

**Name** Mark Rasmussen**City** Ames**State** Iowa**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input checked="" type="checkbox"/>	<b>Point Source</b>

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The team behind the comprehensive science assessments offered in the new Iowa Nutrient Reduction Strategy should be congratulated. The scientific assessment portion of the strategy is an important first step, offering an excellent baseline and tool to address Iowa's nutrient pollution issues.

Nearly all of the practices evaluated have some history of research investment by the Leopold Center for Sustainable Agriculture, stemming from the Center's mission as specified in the 1987 Iowa Groundwater Protection Act. Notably, the current strategy includes joint consideration of point and nonpoint sources, the goal of prioritizing investments, recognition of the need for continued research, and the idea that market and evaluation mechanisms are needed to ensure widespread adoption of the necessary practices.

However, the strategy could be more explicit about how additional data can be incorporated into the tool. It is not clear how this will happen, or how users can be made aware of new data and related practices. For example, the Liebman et al. 2008 rotation research now offers water quality measures that were not available when the practices table was assembled.

A primary concern relates to the strategy's expectations for achieving significant water quality improvements. Encouraging responsible soil and water management is important, but if Iowa is truly intent on enhancing water quality, attention needs to be directed beyond the outward symptoms (too much N and P in the water) to the social and economic environment that creates them. After 25 years of Leopold Center experience in supplying modest amounts of funding for agricultural conservation research, a key lesson learned is that achieving the kinds of goals proposed in the plan is more about the relationships among people, science and the environment rather than merely summarizing the available science. Mustering the economic and social will to make changes is the real challenge. One can be hopeful that the necessary will can be found.

The Iowa Nutrient Reduction Strategy is a tool that has the potential to open the door for Iowans to start thinking and acting differently about water quality management. The Leopold Center experience shows that convening a variety of partners, stakeholders, and researchers around science-driven practices and a systems approach can lead to viable options and actions for change. Successful implementation can occur when citizens and businesses come together and agree to leverage limited resources to create something bigger and better, a collaborative effort uniquely suited to Iowa.

There is a reasonable expectation that Iowa's future will include agricultural systems that strengthen positive relationships among soil, water, and people. The Iowa Nutrient Reduction Strategy can be used to further that vision.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #292.

Timestamp 1/3/2013 4:09 PM

**Name** Matt Myers

**City** Conrad

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Most farmers are good conservationist. In my fifteen years of as an Agronomist and a Certified Crop Advisor, I have seen voluntary programs for nutrient management work with tremendous success. When it come down to the nutrient recommendations for corn, soybeans, or hay it still comes down to economics that being said □ the most economic efficient decision will be the most environmentally friendly . No farmer wants to spend more than is necessary to produce optimum yields. Furthermore what I believe that needs to happen is the Environmental community needs to be in tune with modern agriculture and educated on the farm and a much broader dialogue begin if we all want to succeed. Education of both parties needs to be the first step.

Name Gary Siegwarth

City Elkader

State Iowa

Providing comment on the following sections:

<input checked="" type="checkbox"/> Executive Summary	<input checked="" type="checkbox"/> Nonpoint Source
<input checked="" type="checkbox"/> Policy	<input type="checkbox"/> Point Source

Relying on voluntary conservation efforts won't work! Please do something more than voluntary efforts to protect our waters!

Please reconsider a tougher plan of action for cleaning up Iowa's valuable water resources. When the proposed plan to clean up Iowa's water resources offers language directly linked to Farm Bureau, then you know Iowa's future is being dictated by corporate agriculture. Profits, not conservation is at the top of their agenda. It seems embarrassing that those experts in the know, those out monitoring our water quality across the state appear to have little input and were not consulted in development of a plan to help clean up our waters. If this is the best we can do then its time to bring in the EPA to do it for us.

The slow destruction of the landscape and our water is a cultural flaw that runs deep, but is not irreversible. It would take courage at both the state and federal levels to correct, maybe even a conservation revolution of the people who, unfortunately, are generations out of touch with their actual connection to the land. Even fewer recognize the need for them to understand and comment on this strategy. The conservation revolution would have to begin by redefining land stewardship as giving something back to the land and redefining landowner rights as landowner responsibility

A large part of Iowa's problems also stem from the lack of courage by Farm Bill legislators to enforce existing conservation compliance or to tie conservation compliance to programs such as Federal Crop insurance. An example of how out of touch our legislative farm leaders are comes in the form of a quote at a recent Chuck Grassley town hall meeting. When a local farmer voiced concern with soil erosion, Senator Grassley responded: "You tell who ever told you that, that the problem of soil erosion ended 25 years ago when farmers were required to have a conservation plan as part of being in the farm program."

Now back to the Iowa landscape. If you drive across the Iowa landscape, it doesn't take a rocket scientist to evaluate the broad scale noneffectiveness of voluntary conservation efforts. Examples of voluntary efforts are on visual display for all to see in the form of smoldering tree piles, tiling machines, blanket fall tillage, manure spread on snow covered fields, and anhydrous ammonia tanks that dotted the countryside this past fall. A whole host of payment-based conservation programs and proven practices have been available for years. Where are all the stream filter strips and buffer strips along streams and rivers? Where are the shelter belts, field borders, and restored wetlands?

A few years back an Iowa State University Ag Economist told the joint Fish & Wildlife Society that we should not worry because as commodity prices climb higher farmers will not feel as pressured to till as much less productive and vulnerable land. What has happened instead is that more producers have gone road ditch to road ditch to till every acre possible. Even the smallest areas of vital habitat have been cleared at an unprecedented rate.

Streams and rivers are the ultimate measure of what happens on the land. Water quality has not improved. The gulf hypoxia zone continues to increase. Rivers are inundated with fine silts on the floodplains and excessive sand loads in the channel covers critical habitat of aquatic organisms like a barren flowing desert. Flooding has worsened due to continued alterations in the watersheds and that trend will become glaringly more evident when heavy rains return. The barometer of the streams and rivers are trying to tell us something and it seems that message is not what we want to hear. So we simply ignore the visual facts that things are not improving and will continue to get worse.

If a factory can't have a pipe dumping effluent into public waters than why should the business of agriculture? We don't offer industry billions of dollars in funding and then hope for the best in their voluntary efforts. Agriculture is a multi-trillion dollar industry that is degrading the common resources of the people and species we share the land with. Agriculture receives billions of dollars in Federal aid and subsidies and is required to give nothing back in return. Its time for industrialized agriculture to do its part by being mandated to do the right thing in its pursuit of maximum profits and guaranteed subsidies. A recent survey showed that nearly 75% of Iowa farmers are completely debt free. They bid up land to unprecedented prices and buy larger expensive equipment, while giving little back to the land or to the common resource from which their profits have been taken. Why should additional public funds have to be invested for them to clean up their act? Why should nutrient reduction be at the mercy of additional public funding when agricultural profits are soaring?

Any one of us could get a citation and be fined for the most simplistic and meaningless social violation of not having a life jacket along as we paddle down river in a canoe, yet the much larger ecological tragedy to the landscape, the water, the aquatic species, and the people goes ignored by legislators and unregulated because of strong political lobbying. Its time to put the industrialized agricultural model on a level and moral playing field by having the regulatory courage to stand up for what is right by forcing them to do what is right. Modern agriculture has already had the chance to do that voluntarily and has failed miserably.

I have provided some visuals to show first hand the impacts to water quality. These are from Iowa's largest spring, Big Spring, which show the water quality impairments that have made their way into an underground aquifer. Huge silt loads and organic material with very strong manure orders come out of the spring after heavy rainfalls and during spring snowmelt. Water samples during snowmelt show ecoli bacteria

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 2 of comment #293.

Timestamp 1/3/2013 4:13 PM

**Name** Gary Siegwarth

**City** Elkader

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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levels in excess of 3,000 organisms per liter. Nitrate levels have soared in recent years as additional acres of land going back into row crop production overwhelm any conservation efforts. Although a few landowners in the watershed do a great job and understand their connection in the watershed, most do not even realize the impacts or their connection to the spring. (I will be sending these pictures because they are a very good visual testimony to past voluntary efforts and this forum does not allow for attachments which tell the real story)

Gary Siegwarth

Elkader

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #294.

Timestamp 1/3/2013 4:56 PM

**Name** Hubert Hagemann

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

We support the Iowa's Nutrient Reduction Strategy because it is using scientific-based research to help

farmers and landowners voluntarily adopt practices to help improve the state's air and water. Farmers have already used practices that have considerably improve the situation from the past the air and water quality. This strategy will help them to do more for the state's air and water by developing practices that fit the needs of the situation rather than the one-size-fits-all that will be much more practical and cost effective.

Hubert Hagemann

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #295.

Timestamp 1/3/2013 6:58 PM

**Name** David M. Meyer

**City** Tipton

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I'm a land owner in Cedar co. The Rock Creek runs through my farm. I'm former associate soil and water consevation commissioner in Cedar co. I've coordinated water monitoring with IOWAWATER,Cedar co. snapshots. I know and I've seen what's going on.

As a landowner,kayaker and fisherman in my watershed, I support "edge of field" buffer strips as an important immeadiate step to reduce soil erosion and nutrient loads. I see every year rows of corn that fall into streams. I believe some sort of buffer strips should be mandatory. Allowing livestock unfettered access to streams is also a HUGE problem.

Thank you,

David M. Meyer

Feel free to call 563.357.0772

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #296.

Timestamp 1/3/2013 9:05 PM

**Name** Joe Thraenert

**City** Elma

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I believe that we need to ban together as Iowans and Upper Midwesterners, using common sense dialogue and scientific realism to protect our industry and the large contribution that it makes to the Iowa and U S economies. I am enrolled in the CSP Program and use no-till, minimum tillage, buffer strips, side dressing of UAN, etc. I do believe that ISU is antiquated with their recommendations for P & K, for the yields that we are raising and will continue to increase these yields. ISU is holding production agriculture back and needs to reassess, and work with the producers of Iowa and the Upper Midwest to move forward and be a profitable industry, as well to be strong into the future for the following generations.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #297.

Timestamp 1/3/2013 9:05 PM

**Name** Joe Thraenert

**City** Elma

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

---

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**Name** David Reis**City** Decorah**State** Iowa**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input checked="" type="checkbox"/>	<b>Point Source</b>

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I have lived in the Upper Iowa River Valley for most of my 63 years. Since the 1980's I have closely observed the area between Riceville and Decorah. The ditches, fence lines, small creeks, wet spots, have been drained and largely corn and hog farmed. The vast majority of habitat has been obliterated. The streams and rivers are seasonally flooded with poop, mounds of stinky foam. Farmers are paid over and over again to put in grass strips, they partake in conservation CRP abuse, crop insurance abuse, subsidy for bulldozer work, etc. etc. For all the little critters and for all rural residents, and the pollution and chemicals we rural residents have to endure, the current coalition of Ag. departments and services, DNR, soil conservation services...seems to be a joke and representing only a few. I fear for our future if organizations such as yours don't get serious and start being proactive for our dwindling environment.

3342 chimney rock road, decorah, iowa 52101

David Reis

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #299.

Timestamp 1/3/2013 10:23 PM

**Name** Robert De Haan

**City** Sioux Center

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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The nutrient reduction strategy does a very good job of summarizing what is currently known about nitrogen and phosphorous losses from agricultural landscapes. The recommendations for reducing these losses would almost certainly be effective if implemented.

The implementation strategy is clearly the weak link in the strategy. It relies primarily on education, and that will not be sufficient to bring about timely changes in today's profit-driven agricultural environment.

A combination of economic incentives and disincentives needs to be examined. It is possible that a well-designed policy could provide meaningful economic rewards to agricultural producers with minimal nutrient losses by transferring funds from those producers with the highest losses. A tax on fertilizer sales might also be used.

The proposed strategy could be strengthened by looking for additional ways to promote change. Agricultural practices that sequester carbon (perennial crops, cover crops) also generally do a good job of retaining nutrients. The state should explore the development of a well-organized market for carbon credits. This market could then be promoted domestically and internationally.

Perennial crops clearly reduce nutrient losses. Although there are a number of perennial forage crops available, there aren't any herbaceous perennial seed-producing crops well adapted to the state. A cooperative private-public research effort designed to develop such crops might be an effective long-term strategy and should be considered.

The current level of state support for agricultural conservation and nutrient retention is minimal. Supplemental state funding for the federal Conservation Security Program may be an effective use of funds, and should be explored.

If the state's nutrient reduction strategy is to have a timely impact, economic incentives and disincentives will need to be part of the package. Involving some of the state's top policy personnel in this strategy could substantially strengthen the proposed plan.

**Name** Mark S. Edwards**City** Boone**State** Iowa**Providing comment on the following sections:****Executive Summary****Nonpoint Source****Policy****Point Source**

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I have extensive files related to Iowa's water quality issues dating back for many decades including data, scientific studies, and media coverage. I retired from the Iowa DNR after thirty years of service as Trails Coordinator. I had a window cubicle in the central office facing the capitol in Des Moines. I have inside knowledge of the politically dominated, debauched Department. I have personal accounts including documentation of illegal activities not addressed by DNR staff until the former Governor; Tom Vilsack stepped in personally to enforce the law. Things have gotten much, much worse since Vilsack left.

I have spent a considerable amount of time on the rivers in Iowa searching for artifacts, paddling, fishing and developing the Water Trails Program for the DNR. With the recent shortage of water in the streams it has become difficult to walk on the bottom and not slide on the green slim produced by the lethal doses of nitrogen being dumped into them. Having lived directly by the Des Moines River for forty years I could describe the continuing loss of wildlife and water quality I have personally observed. I could easily go on for many pages with information and personal accounts of how insane we are to allow our water to reach this level of loss and lifelessness.

I could focus on the human-centered atrocities in costs both economically, physiologically, and psychologically to maintain our drinking water, livelihoods, recreational opportunities, health, ethics, morals and offenses to our senses. I could try and reason about the more-than-human devastation we have done to the world of other species. For example, the Lesser Scaup Duck, the most common diving duck in North America cannot even fly across our state without starving to death or losing so much body weight it cannot reproduce due to our sickening water quality. I could lament the continuing death of the fish, clams, frogs, birds, plants and aquatic habitats with the hope of stopping the killing.

I could talk about the science of Ecology which teaches us we cannot cover two-thirds of Iowa's 36 million acres in just two species and expect to sustain the soil, the lives of the people or the other species necessary for all life to continue. I could talk about sustainability in relationship to water quality and agriculture which is a joke as we have lost over half of our topsoil in the last fifty years with all our conservation practices in place and have the worse water quality ever. I could talk about the lack of education and understanding we all have in regards to how this world of water even works.

I could do this for many pages but I feel it would be a waste of my time and yours. Things have gotten so bad in state government I have no hope in Iowa's money/power-driven, human-centered, selfish political world of corporate control to even begin to formulate the correct questions let alone address the problems. I also have lost faith in our federal government doing anything with the recent farm bill and budget decisions within the EPA and USDA along with their previous staff reductions. I believe the pseudo-science now being taught at my alumni institution, Iowa State University will be but endorsements for corporate agriculture and the death of diversity by exchanging dead frog skins for dollars.

Therefore, I have little recourse but to say I am appalled, ashamed and yet motivated to fight this shallow, short-term thinking, death-determining delirious dream of voluntary compliance for the rest of my life. If you cannot be shamed into doing the right thing then you must be forced which is exactly what the EPA must do to the government of Iowa by enforcing the Clean Water Act as it was intended.

**Name** Steve Ballenger**City** Ankeny**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

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After reading the Nutrient Reduction Strategy, I am struck by the fact that voluntary conservation measures are recommended to continue as a viable way to solve Iowa's present and future water quality issues.

I moved to Iowa in 1989. I hunt, fish and have paddled hundreds of miles of Iowa streams and rivers. My passion for supporting water quality issues has come about as a result of seeing first hand the human and agricultural pollution in Iowa's rivers. I can see that many farmers have taken steps to reduce pollution and erosion into our rivers. There are many more who are doing nothing and have even begun planting even closer to rivers and streams.

I believe Iowa is way past the point where voluntary conservation measures will reverse the trend of highly polluted waterways. In my treks along Iowa rivers, I've seen examples like the farmer who plants right up to the waterline on the beautiful Yellow River for over a half mile. Cornstalks growing horizontally out over the river with twenty foot cliffs of highly erodible soil cascading off into the river. I've seen the same example north of Garber on the Turkey River of over a mile of cornstalks sliding into the river. I've stepped off rockbars on the Upper Iowa River into three feet of fine silt. I've seen the bubbling mucks and phosphorous blooms. I am not convinced that every farmer will do the right thing and many, succumbing to production greed, are making water quality worse in Iowa.

It is the many farmers who have no interest in voluntary conservation measures that need to be regulated now. They are polluting Iowa's rivers and waterways. The Iowa Farm Bureau would like us all to feel good with warm fuzzy messages of what this or that farmer is doing to conserve and be greener but I've seen mostly the opposite of that in my ground's eye view from the rivers. We treat rivers as sewers in Iowa. We've been doing it for over 100 years. If the Nutrient Reduction Strategy calls for more voluntary conservation measures, we will fall far short of our goals and business as usual will continue to proliferate.

If the Iowa Farm Bureau and the Iowa Department of Agriculture & Land Stewardship are to be considered responsible advocates of clean water then let's look at their deeds not their words.

In 2009, the IFB was invited to join the Iowa Water & Land Legacy campaign in order to pass an amendment change by popular vote to create the Natural Resources and Outdoor Recreation Trust Fund. The trust fund would begin to systematically address failing water treatment plants and even augment federal conservation enrollment programs for farmers. After initially showing interest, the IFB quickly turned against the idea and began its own campaign of lobbying against the constitutional amendment. The amendment was passed by over 63% of Iowa voters. IFB's role in fighting the amendment created much malcontent within its ranks by farmers who supported the amendment.

In 2011, the IFB attempted to push a bill through the Iowa Legislature essentially placing Iowa Department of Natural Resources water quality programs under control of IDALS. This also failed after calmer heads prevailed. IFB and IDALS wanted farmers and non-farmers alike to believe that we should put "the fox in charge of the hen house". Unbelievable! And in 2012, IFB again attempted to push a bill through the Iowa Legislature to make it illegal for the IDNR to purchase any private land - period! That would mean that if the Nature Conservancy, the Iowa Natural Heritage Foundation or any other nonprofit conservation organization had identified and purchased environmentally sensitive lands, they could not recoup their funds for a future project by selling the existing project to the IDNR for management and recreational use by Iowans.

IFB and IDALS are waging a war on the IDNR while governor Terry Brandstad can sit quietly on the sidelines (in the pocket of big farm interests) and direct them like puppets. The goal of IFB, IDALS and governor Brandstad is to weaken the IDNR to the point that they cannot make any enforcement decisions. They can then blame the IDNR for not making decisions and strip them of their manpower and authority. Meanwhile, the Environmental Protection Agency has mandated the IDNR to make strong enforcement decisions or face regulation.

As someone who has seen firsthand the magnitude of pollution and erosion in Iowa's rivers and streams, I welcome regulation by the EPA. Big farm interests are waging a war on the IDNR, Iowans and water quality. They are smiling and telling everyone how much progress they've made through voluntary conservation measures.

Let's make the IDNR stronger. Let's ask for EPA oversight. Let's work together and create a strong comprehensive plan for water quality and water security involving all Iowans.

Steve Ballenger

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 2 of comment #301.

Timestamp 1/4/2013 1:06 AM

**Name** Steve Ballenger

**City** Ankeny

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Ankeny, IA

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #302.

Timestamp 1/4/2013 7:52 AM

**Name** Iowa Farmers Union

**City** Ames

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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While the Iowa Nutrient Reduction Study addresses concerns that are paramount to Iowa Farmers Union doctrine, we endorse stronger enforcement of agricultural related Environmental Protection Agency, Iowa Department of Natural Resources and Iowa Department of Agriculture and Land Stewardship water quality standards in accordance with the Clean Water Act and increased funding toward those efforts in Iowa. We do not support voluntary conservation compliance, but strongly request that subsidies and supports be tied to conservation compliance measures and that payments not be made until compliance has been proven. Research and enforcement must be more aggressive in order to achieve necessary and immediate results.

**Name** Iowa Natural Heritage Foundation**City** Des Moines**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

Iowa Natural Heritage Foundation

Comments on Iowa's Nutrient Strategy

January 4, 2013

We agree with the stated goal: "Iowa is a national and global leader in the production of food and renewable fuels, so a goal of this strategy is to make Iowa an equal national and global leader in addressing the environmental and conservation needs associated with food and renewable fuels production."

We endorse the concept: "The strategy harnesses the collective initiative and capacity of Iowa agricultural organizations, ag businesses and farmers towards implementation of nonpoint source management practices to improve Iowa water and soil quality." We encourage this focus because it may be far more cost effective, and provide more timely progress, than government driven regulatory or incentive programs.

While these quotations suggest agriculture may use this strategy to lead, the state agency actions and omissions to date do not warrant a passing grade for this state document as drafted. We believe the Environmental Protection Agency should give this work the grade of "INCOMPLETE"

We urge EPA to defer approval of this initial study, and to delay the granting of any leniency or forbearance for Clean Water Act implementation in Iowa, until state capacity and commitment to vastly accelerate the voluntary clean-up of polluted runoff in Iowa has been proven.

We recommend that DNR and IDALS voluntarily do (or that EPA require) the following actions before approval of Iowa's nutrient strategy is allowed to further delay clean water compliance requirements:

- The Water Resource Coordinating Council must further develop the plan it is assigned to implement, and several more agencies must seriously contribute to the implementation.
- Private sector entities must publicly endorse and consent to their new roles and responsibilities described in the state strategy.
- The strategy must set higher nutrient reduction goals that acknowledge agriculture's pollution loads may have increased about 10%, because Iowa planted acres have increased by about 10% since the nutrient reduction goals were set in 2008.
- The strategy must define efforts to address the newly recognized high contributions of nutrient loads from in-channel stream bed and bank erosion, and flood scour erosion from cropland floodways.
- DNR and IDALS must fully utilize new LiDAR based conservation planning technologies, and also empower enhanced private sector services to use these technologies.
- The strategy must fix the striking inequity between farmer regulatory exemptions and urban requirements. Under the draft strategy, regulated municipal and industrial waste water treatment facilities would have average annual costs increase by \$114 million dollars when local facilities must renew their discharge permits. On the other hand, farmers still get voluntary programs that help pay to address their nutrient pollution loads, and individual farmers can still opt to totally ignore their pollution impacts. The tool of nutrient trading is especially unfair because it enables farmers to sell as a service the cleaning up of their own or their neighbor's pollution to a regulated city and industry, whose costs are passed on to their residents and customers. Nutrient trading should be used sparingly because it is a regressive income transfer scheme of mandatory fees on essential city services to then pay farmers and farmland owners who volunteer to manage responsibly. The strategy should prescribe a high threshold of voluntary water protection as a prerequisite for farmers selling environmental services through nutrient trading.

There are two ways to achieve a more equitable state nutrient strategy:

- 1) Iowa should require broad farmer conservation participation, such as requiring soil conservation and nutrient management plans for all farms; and/or
- 2) Iowa should reallocate resources or raise taxes so farmers take greater responsibility for voluntary water clean-up, and less of the clean-up burden falls on waste water utilities.

Here are policy examples for more fairly spreading clean water expenses:

1. The ag land property tax credit is reformed to become a farm conservation income tax credit.
2. The various commodity check-off funds (corn, soybean, pork, beef, dairy and poultry) are required to make substantial investments in annual implementation of the state nutrient strategy.
3. The fertilizer tax that supports the Groundwater Protection Fund is substantially increased.
4. A sale tax is charged for drainage materials and installation services to help fund watershed programs.
5. The Corn Promotion Board is required to collect check-off funds from the sale/purchase of corn stover used in biofuels production, with the proceeds paying for additional conservation planning and technical assistance where biomass markets have developed.
6. The Iowa Financial Incentives Program at IDALS is entirely targeted to watershed projects.
7. The underground storage tank Environmental Protection Charge is authorized to be distributed through the Road Use Tax Fund for enhanced water management practices installed in road ditches and right of ways.
8. The sales tax is increased to fill the trust fund revenues authorized by 63% of Iowa voters in the 2010 Iowa Water and Land Legacy referendum.

We sincerely hope agriculture will lead the way with policies and programs for timely implementation of very specific nutrient strategies. Now is the right time for the farm lobby and conservation community to work together to put far more resources into Iowa's water protection efforts. The state nutrient strategy is INCOMPETE, and must be opposed by the conservation community so it cannot become stalling strategy. We believe private sector farm and conservation leaders should work together to define a policy agenda that really will make Iowa a national and global conservation leader.

Mark C. Ackelson,  
President



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #304.

Timestamp 1/4/2013 8:18 AM

**Name** Jeremy

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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One of the suggestions in the assesment is to treat 70% of all streams with a filter strip. I work in the private lands field and have been trying to promote CRP filter strips. I have found that there is no way we will ever get close to even 50% buy in to filter strips. The profit margin for producers and cash rent are way to high compared to the payments CRP can offer. There has to be a change in the price of corn and beans or a way for Iowa to supplement CRP payments to ever get to 70% buy in.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #305.

Timestamp 1/4/2013 8:26 AM

**Name** Jim Pfeifer

**City** Waukee

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I believe Iowa's nutrient strategy will work to achieve the targeted load reductions through voluntary practices that allow farmers freedom to develop customized solutions that fit the individual needs of their farm and farm ground, thus avoiding expensive and often ineffective mandatory regulations.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #306.

Timestamp 1/4/2013 8:41 AM

**Name** Mark Dopp

**City** Washington

**State** District of Columbia

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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RE: Iowa Nutrient Reduction Strategy

Dear Secretary Northey and Director Gipp:

The American Meat Institute (AMI) is a national trade association. AMI members process 95 percent of all red meat products and 70 percent of all turkey products in the United States. AMI members own and operate several meat and turkey processing facilities in Iowa and are major contributors to the Iowa animal agriculture economy.

The AMI Environmental Committee commends the Iowa Department of Natural Resources (IDNR) and the Iowa Department of Agriculture and Land Stewardship (IDALS) for the development of the Iowa Nutrient Reduction Strategy (Strategy). The Strategy is a practical, cost efficient approach to effectively reduce the discharge of nitrogen and phosphorus into Iowa streams, thereby improving water quality in the State. This approach should also result in a significant reduction in the nutrient load in the Gulf of Mexico.

AMI supports the point source strategy of implementing technology based discharge limits on wastewater treatment facilities now and evaluating appropriate numeric water quality standards long term. This approach is more practical than the numeric in-stream water quality standards that have been implemented in other states. The Iowa point source nutrient reduction strategy will result in more immediate investment of resources in treatment facility improvements and, therefore, reduction in nutrient loads from wastewater treatment facilities. Moreover, time consuming and resource intensive legal and technical challenges regarding the reasonableness of numeric nutrient water quality standards should be avoided.

Some AMI members have already installed nitrogen removal processes at their Iowa wastewater treatment facilities. Those companies will now investigate phosphorus removal at their next NPDES permit renewal pursuant to the Strategy.

AMI also supports and applauds Iowa's efforts to define the impacts and costs of agricultural management and edge of field treatment practices. This information will be used by other Midwestern states and farmers as they develop similar strategies. It is vitally important that Iowa agriculture remain financially competitive with other states and nations in the meat protein markets. The nonpoint source strategy, including the assessment of nonpoint source management practices, provides a framework for developing economically efficient policies, and directing public funds and incentives to provide the greatest reduction in nutrient loads.

AMI looks forward to working with IDNR and IDALS as the Nutrient Reduction Strategy is implemented over the next several years.

Respectfully submitted,

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #307.

Timestamp 1/4/2013 9:10 AM

**Name** Ross Berglund

**City** Randall

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I believe Iowa's nutrient strategy will work to achieve the targeted load reductions through voluntary practices. As a local Certified Crop Advisor I've already been working with producers using cover crops to reduce runoff and reduce the amount of fertilizer needed. So far it is on a small scale but as we learn more the amount of cover crops should grow.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #308.

Timestamp 1/4/2013 9:27 AM

**Name** Scot Christiansen

**City** Edgewood

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Where are the teeth? This is not a "Plan", it is a set of nice ideas. The non-point source part of the Plan basically says:

"We are doing great. We will try our best to improve."

Do you really think this Plan will meet the goals of non-point nutrient reduction? Or are you just 'going through the motions' in order to keep the EPA off of Iowa's back?

Forcing Iowa's farmers to change their practices in order to reduce nutrient runoff would be painful, but how can we meet meaningful goals without enforced regulations? I am impressed to see lots of scientific information in this document. But it looks to me as if the authors are afraid to upset the people responsible for most of the problem - farmers. Yes, we all rely on the economic activity of farming, but why can't farmers follow the same rules as everybody else? Factories, automobiles, and power plants are all important to us too, but we accept the idea that they need to submit to government regulation in order to promote the public good. Why should farmers be exempt?

If you seriously think that voluntary adoption of best practices will get the job done, then let's see you take this idea seriously. How soon will voluntary activities reduce nitrogen runoff by 5%? 15%? 41%? What is the plan if these goals are not being achieved? Without addressing these questions, I can't believe that this is a real Plan.

Does Iowa want to lead the world in finding ways to sustainably produce food and fuel? Then our Plan has to have some teeth.

Thank you for your attention.

Sincerely,

Scot Christiansen

34782 Littleport Road

Edgewood, IA 52042

Name James Patrick

City Storm Lake

State Iowa

Providing comment on the following sections:

<input checked="" type="checkbox"/> Executive Summary	<input type="checkbox"/> Nonpoint Source
<input checked="" type="checkbox"/> Policy	<input checked="" type="checkbox"/> Point Source

I am the City Manager for the City of Storm Lake. I am concerned that the State is ready to accept this as  the best solution and move on. I understand why since we do not want the EPA solution. It is true that IF the EPA signs off on this plan and implementation program that this would be less of a burden on cities. BUT the IDAL  s representative questioned if EPA can be tolerant and/or the environmental groups will not try to push the time lines. With that said, there is a lot that can be cleaned up in the overall plan.

I am concerned that the DNR and IDALS are trying to get this through under the State radar. This plan was kept secret for a long time and now the State is giving us a month to read it and comment back before January 4, 2013. This does not feel right nor does it give the public an opportunity to truly understand the magnitude of the problem and the fiscal impact it will have on the State, Cities, and agricultural interests. DOT did a better job hearing the public and explaining transportation funding last winter. I understand why DNR wants to keep this in rule making and not legislative, but legislators are already asking questions as to what gives DNR the right to impose this policy since they have not been informed nor do they understand. Why does this have to be done so quickly and quietly? I would be interested in the time line they are working on.

DNR/EPA needs to know the background (naturally occurring) phosphorus and nitrate that will be there regardless of city or agricultural efforts. This has been and will continue to be a problem. That needs to be factored into the potential solutions and target goals.

I am in full agreement that cities can do a better job treating wastewater, but what about a cost benefit analysis? Where is that point of diminishing returns? Storm Lake is undertaking a \$10 million treatment plant upgrade and while we will be moving toward biological nutrient removal, more could have been planned if we would have known earlier or the time line was not so stringent. IDNR talked about treating to the ability of a city to pay if a city can't afford the 10/1 standard. I do not see that in the plan. It seems that if 80% of the phosphorus is from the stream banks (page 8 and 9 of the study), and is released in three events (IDAL  s presentation), that maybe there should be an effort to find a way to remedy that release to get more bang from the buck spent. Should the State control 35 feet either side of a stream or river and insure buffer strips are in place? Section 2.1 of the plan, page 2 under Phosphorus (last sentence on the page) states  Edge of Field practices through buffers or sedimentation basin/ponds show potential for dramatic reductions in phosphorus, 58% and 85% respectively. Section 2.2 page 29 and 30 states that a 35 foot buffer on all crop land has the potential to reduce elemental P loading by 3,090 tons/year, which is about 18% of the overall phosphorus load reduction. Page 29 states that buffers would also reduce nitrate-N load from shallow ground water. I would suggest that the cost/benefit would be much better.

There is over \$300 million available right now in the Mississippi River Basin initiative to incentivize farmers to use conservation methods to reduce nutrient loading. The problem is that farmers get more out of farming so many of them do not want to volunteer for conservation methods, in fact, they are plowing up buffer strips to put more of their land into production. This is compounded by the fact that there are many absentee land owners, many out of State, and the tenant is interested in making money  not conserving soil. In the proposed  Voluntary program being promoted, there is no accountability and no teeth. The IDAL  s presenter is right, it will be hard to herd 90,000 farmers and insure they are doing the right thing. To achieve 41% reduction from this voluntary program will not work (IDAL  s words). If it does not work, maybe something should change in the plan or maybe some of those funds could come to cities to upgrade the plants to remove 4% of the problem if agriculture can not do it. Page 11, Section 1.3 of the non-point study summarized that  EPA is not targeting agriculture. Why, because it is too hard and easy to regulate permit holders?

As the DNR looks at new technologies for city POTWs, is there technology available to manage streams and rivers? The report speaks of bioreactors for nitrates. There is sand/iron filing filters to remove phosphorus that works at 80% efficiency for storm water. A portion of the \$1.5 billion diverted from new treatment plants to install wetlands and new technology may be more beneficial. Please understand that I think cities should do a better job but state of the art technology to achieve small incremental improvements does not serve anyone and does not make a significant contribution to nutrient removal. This is the easy way out by applying pressure to permitted polluters and not adequately addressing the real problem. There needs to be meaningful change to agricultural practices beyond a voluntary program as well as improvements at city plants.

I am concerned about the cost to cities for new/upgraded BNR plants and then the added operational costs. In the case of Storm Lake, a BNR plant would help remove nitrates and phosphorus. Having had the best BNR plant in the country in Montana, I know that in winter the bugs need to be treated with care. With the high protein loading received by Hillshire, it is possible to significantly upset the plant. If a system is in compliance 99% of the time yet has one significant excursion, they could be in non-compliance for the better part of a year with the annual average limit or be forced to chemically treat at a very high cost/return. Is there an alternative to this? (DNR did not have an initial response to this).

Solids handling concerns me also. Since solids will increase with the use of alum or ferric polymers, the operational costs will also increase for solids handling. Will the DNR/IDALS change the land application regulations and rates to keep nutrient loading down so that we need to expand the area to be able to land apply solids? I would anticipate the need to expand the solids storage and handling capabilities which may not have been calculated in the annual operational budget.

This will limit the growth of cities since there is no head room. As cities expand, new technology will be required to stay within the permitted numbers.

Again, I think that this needs more thought and comment with more involvement from cities.

The following is an excerpt from  MURKY WATERS: Farm Pollution Stalls Cleanup of Iowa Streams executive summary pages 6 and 7. If you would like a copy of the complete report, let me know and I will forward an electronic copy. Again, this is not to say that cities are off the hook, we have a role to play but if we are going to fix the nutrient loading it has to be a holistic approach and we are not there yet.

It Doesn't Have To Be This Way

**Name** James Patrick**City** Storm Lake**State** Iowa**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input checked="" type="checkbox"/>	<b>Point Source</b>

Iowa's rivers and streams can be clean, but only if Iowans take concerted action to reduce the

nitrogen and phosphorus overload from agricultural operations. The good news is that experience and

science make it clear that concerted action does result in major improvements. Iowa's voluntary programs could work much better if they were revamped to be more effective and were provided with a larger and more secure source of funding. The governor and the legislature must act to implement the Iowa Land and Water Legacy amendment endorsed by 63 percent of Iowans in 2010. The state's citizens voted to tax themselves to provide funding to clean up their water. It is time for Iowa's politicians to follow through. The Department of Agriculture and Land Stewardship must revamp the way voluntary programs are implemented to increase accountability, target resources to the right places, monitor and report on the farming and conservation practices used by farmers and make use of highly trained professionals to advise producers and make programs work. Revamping the way conservation programs are implemented will produce better results more quickly. But even the most focused and best-managed voluntary programs will not be sufficient to solve the water quality problems associated with agricultural production if they remain entirely voluntary. More money will help, but even massive increases in funding will not overcome the inherent weaknesses of relying solely on voluntary action.

It is time to face facts — decades of working only with farmers who volunteer to reduce their polluted

runoff has not achieved any overall improvement in Iowa's streams and rivers. This report shows that

40 years of the voluntary approach have failed to improve nitrogen and phosphorus pollution. EWG's

2011 report, *Losing Ground*, similarly showed that 80 years of the voluntary approach had failed to

adequately reduce pollution from sediment flowing off farm fields. The state must put in place smart and narrowly targeted regulations that curb poor farming practices. Regulations should phase out particularly risky practices such as planting crops right up to stream banks or allowing livestock unmanaged access to streams. Landowners and managers should be expected to control the ephemeral gully erosion that creates a direct pipeline for mud, fertilizer and manure flowing into streams and rivers. Many, if not most, farmers would agree that these activities are simply bad business practice and bad for agriculture's brand.

Since the boom in corn and soybean prices, simply driving across Iowa provides compelling evidence

that voluntary programs must be buttressed with smart regulation to ensure that proper conservation

practices don't lapse. Conservation will have to become far more durable for there to be any hope of

cleaning up Iowa's streams and rivers.

Such regulations would establish a basic standard of care that comes along with the rights of land

ownership. Voluntary programs can then be used to support those landowners and managers who meet

these basic standards and want to do still more to clean up Iowa's rivers and streams. Precisely targeted regulation coupled with a strengthened voluntary program would set Iowa on a path toward cleaner water for our children and ourselves.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment **#310**.

**Timestamp** 1/4/2013 9:59 AM

**Name** Byron Gutshall

**City** Booneville

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I support the state nutrient strategy and have demonstrated voluntary practices will work. Iowa agriculture can lead the nation in production of food and renewable energy and set the standard for addressing environmental and conservation reform.

I believe Iowa's nutrient strategy will work to achieve the targeted load reductions through voluntary practices that allow farmers freedom to develop customized solutions that fit the individual needs of their farm and farm ground, thus avoiding expensive and often ineffective mandatory regulations.

I also believe continuing to implement grid sampling the soil and using variable rate technology. This allows to put back the appropriate amount of nutrients for optimal crop uptake and growth by placing the right amount of nutrients in the right areas.

I support the nutrient reduction strategy.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #311.

Timestamp 1/4/2013 10:04 AM

**Name** Victor Miller

**City** Oelwein

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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The summary does a nice job of presenting what is happening and the pro-active stance that Iowa is taking, the other sections get a great deal more detailed and in many respects without the summary would be unintelligible. I am fully supportive of the approach presented in the document as long as everyone concerned continues to let sound, non-emotional science guide the decision and implementation process. Much has been done by production agriculture ie filter strips, cover crops, grass waterway establishment, etc. to control runoff. Many of these practices have been done at the expense of the landowner. I would only caution everyone to not view this willingness to reach a solution by producers as an admission of guilt and therefore all of the costs should fall upon them. We need to have continued fact based scientific research in this area both to assess the methodology of implementation as well as monitoring issues to see if we have addressed the problem. One of the best aspects of this effort is the cooperation between the EPA, DNR, IDALS, the Governor and all of the stakeholders. We must continue in this vein to have a successful outcome. We all want a solution, we all have to live here and those of us who derive our living from the land most especially want sustainable practices, and a healthy environment in which to operate.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #312.

Timestamp 1/4/2013 10:50 AM

**Name** Leland Groves

**City** Newton

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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DNR has become a joke under Branstad, who I voted for. Voluntary compliance will never work, some will use it, some won't. Drive down the road and look at all the waterway clearing that is taking place, tiling direct to creeks and rivers. Will this impact nutrients flow in a positive or negative manner. Future generations deserve something better.

Name Sarah Fox

City Loveland

State Colorado

Providing comment on the following sections:

<input type="checkbox"/> Executive Summary	<input checked="" type="checkbox"/> Nonpoint Source
<input type="checkbox"/> Policy	<input type="checkbox"/> Point Source

The following comments are directed at Section 2 (specifically sections 2.1 and 2.2) of the Iowa Nutrient Reduction Strategy titled  Nonpoint Source Nutrient Reduction Science Assessment. Within this document, three main strategies were discussed to reduce nitrate loss from agricultural fields, and were basic nitrogen management, land use, and edge-of-field practices. Nitrogen management practices were further categorized into practices that focused on the efficient use of nitrogen, which included application timing, source, application rate, inclusion of a nitrification inhibitor, cover crops, and living mulch.

Enhanced efficiency fertilizers (EEFs) are products designed to increase nutrient availability and plant nutrient uptake while decreasing losses to the environment compared with a reference soluble fertilizer. Nitrification inhibitors are one type of enhanced efficiency fertilizers, but were the only EEFs included in this publication. Other sources considered EEFs in addition to nitrification inhibitors include: slow release fertilizers, controlled release fertilizers, and urease inhibitors. On page 5 in the nitrification inhibitor section, it is stated that  Due to limited data with use of nitrapyrin with other nitrogen fertilizers, or other products that slow nitrification, these were not included in this practice. While this may be true, there has been a large amount of yield data along with some environmental data collected using other EEFs that should be considered.

One such product that protects against all three N loss mechanisms is ESN by Agrium Advanced Technologies. ESN is a polymer coated urea product, and is considered a controlled release fertilizer. The polymer membrane allows water to diffuse into the granule, dissolving the nitrogen inside, becoming a water and urea solution. Moisture and temperature  the same growing conditions that favor plant growth and nutrient demand  release nitrogen from the polymer coating. Moisture creates the nitrogen solution inside the coating, which moves through the coating at a predictable rate, based on soil temperature.

Currently, a number of states have included ESN either into their recommended Best Management Practices, or are actively promoting its use as a better option to their standard practices. For example, the Minnesota Department of Agriculture has included the use of ESN throughout most of the state in their BMPs for Nitrogen Fertilizer Use in Minnesota publication (available at: <http://www.mda.state.mn.us/protecting/bmps/nitrogenbmps.aspx>). The use of ESN, either in the late fall or spring preplant, is an acceptable BMP right along with the use of fall anhydrous with nitrapyrin. Many of the areas in southwestern and south-central Minnesota are very similar to areas in northwestern and north-central Iowa, making this recommendation perfect for those areas.

Based on the literature review done for this report, including a nitrification inhibitor, specifically nitrapyrin, with fall applied anhydrous ammonia showed an average yield increase of 7% as compared to fall anhydrous ammonia alone. Furthermore, the average nitrate-N reduction including nitrapyrin was 9%. While these results may not seem very drastic, they are only looking at one application timing using one EEF. As was stated in this publication, benefits of anhydrous ammonia with nitrapyrin are limited to fall applications. However, ESN can be applied in the fall (where fall applications of anhydrous ammonia or urea are allowed), spring preplant, or as a side/top-dress application. Large yield benefits have occurred using ESN at any of these times. For example, work done by Dr. Jerry Hatfield with USDA-ARS in Ames, IA, compared spring applied ESN to spring applied ammonia from 2008 to 2010. In dry years, such as 2009, there was not a yield difference between ESN and anhydrous ammonia because very little N loss occurred. However, in wet years such as 2008 and 2010, the yield increase of using spring applied ESN over spring applied anhydrous ammonia was 27% and 17%, respectively. Other work done in Iowa by Dr. Randy Killorn (formerly with Iowa State University in Ames, IA) shows that ESN, applied either in the fall or spring, has a greater advantage over ammonia. A study conducted from 2006 to 2007 in Ames and Kanawha showed that ESN applied in the fall and spring increased yield 25 bu/ac and 5 bu/ac, respectively, over ammonia.

Additional research in states surrounding Iowa  Missouri, Nebraska, Illinois, and Wisconsin - has shown that, when conditions conducive to N loss exist, ESN has a substantial advantage over conventional fertilizers. In some cases, it has even outperformed side-dress applications of conventional fertilizers, the recognized best management practice.

Enhanced efficiency fertilizers are one tool that farmers can utilize to help increase their nutrient use efficiencies. Using EEFs, especially ESN, farmers have the ability to increase yields, lower N rates, and increase nutrient use efficiencies, which can decrease the potential for nutrient losses to the environment. We encourage you to consider enhanced efficiency fertilizers in addition to nitrapyrin in the Iowa Nutrient Reduction Strategy. As with any best management practice, EEFs must be used within the framework of a 4R Nutrient Management System (right source applied at the right rate, right time, and in the right place) in order to achieve the desired results.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #314.

Timestamp 1/4/2013 11:01 AM

**Name** Joel Nelson

**City** Carroll

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The proposed strategy makes sense for Iowa farmers and people of the Great State of Iowa. I support the voluntary approach and believe most producers will make the correct decisions that will support a healthy environment. The State of Iowa has tremendous resources in Certified Crop Advisors. These professionals can be utilized to promote farming practices that reduce fertilizer loads in streams and ponds. Through CCA's and cooperating producers we can deliver not only the most reliable and safe food supply in the world but also clean water! Do you really feel the "government" can manage this problem??? Think about that!

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #315.

Timestamp 1/4/2013 11:03 AM

**Name** Brian Lenz

**City** Onawa

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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In reference to the nutrient management practice and TDLM. It is good to remember that as agriculture has been and will continue to be very proactive in being good land stewards. Over the last decade the amount of grain raised per unit of fertilizer has continued to decline. This reduction has been due to better farm management, better fertilization practices, and improved plant genetics. While at the same time continuing to feed and clothe the worlds hungry. I am not prepared or willing to trade off the peace and security of the world for any perceived benefit that a mandated system would create.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #316.

Timestamp 1/4/2013 12:45 PM

**Name** Jon Maakestad

**City** Radcliffe

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I support the state nutrient strategy and have demonstrated voluntary practices will work. I plan to help producers and farmers increase their voluntary efforts, and to help improve the effectiveness of current programs. I believe Iowa's nutrient strategy will work to achieve the targeted load reductions through voluntary practices that allow farmers freedom to develop solutions that fit their individual farms. I believe Iowa agriculture can lead the nation in production of food and renewable energy, help feed the world's growing population, and set the standard for addressing environmental and conservation practices.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #317.

Timestamp 1/4/2013 1:40 PM

**Name** charles vigdal

**City** spirit lake

**State** iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Hello,

I am commenting because the health of the land and water in Iowa is very important to me. There are a couple things I'm concerned about. First, a lot of the solutions to these water quality problems are mostly voluntary. That is not enough. We have been operating that way for some time now. Things haven't improved much. Cleaning up the water and protecting our soil quality is GOOD FOR BUSINESS. This strategy needs more teeth if anything is going to change. Next, I don't believe that there is "non-point" source pollution anymore. If you have well planned water quality testing sites and access to watershed management information you can see exactly where the source is coming from. Please turn this dream of clean water in Iowa a reality and keep the science, ditch the politics.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #318.

Timestamp 1/4/2013 2:08 PM

Name Adam K. Wilke

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Agricultural subsidies and other monetary supports need to be tied to conservation compliance. Further, conservation compliance should not be voluntary--in the case of any federal, state, or local support--it needs to be mandatory. Compliance should also be stringently and adequately enforced. We as taxpayers demand not only inexpensive food stuffs, but also swim-able and fish-able waters for future generations. The Nutrient Reduction Strategy needs to provide a proper balance between production goals and economic incentives of private parties, and environmental health and other ecosystem services for public well-being.



**Name** Linda Kinman**City** Des Moines**State** Iowa**Providing comment on the following sections:**

<input checked="" type="checkbox"/> Executive Summary	<input checked="" type="checkbox"/> Nonpoint Source
<input checked="" type="checkbox"/> Policy	<input checked="" type="checkbox"/> Point Source

January 4, 2013

John Lawrence  
Iowa State University  
132 Curtiss  
Ames, IA 50011

Dean Lemke  
Iowa Department of Agriculture and Land Stewardship  
Wallace Building  
502 E. 9th Street  
Des Moines, Iowa 50319

Adam Schnieders  
Iowa Department of Natural Resources  
Wallace Building  
502 E. 9th Street  
Des Moines, Iowa 50319

RE: Nutrient Reduction Strategy Comments

Des Moines Water Works (DMWW) strongly supports a nutrient reduction plan for Iowa waters. The Nutrient Reduction Strategy has brought to light numeric values for nitrate and phosphorus contributions and necessary reduction levels by point sources and non-point sources. These values are based on Iowa State University's extensive research and literature review. This is the first time this comprehensive information has been brought to light. The strategy however:

- does not establish a numeric nutrient standard, The Nancy Stoner "Framework Memo," #8 states, "Develop work plan and schedule for numeric criteria (water quality standards) development"
- is void of any level of regulation for non-point source contributors
- lacks vision – (such as land use changes) – it is a reflection of where we are today with nothing new or innovative
- provides a lot of suggestions, but no specific action plans
- does not identify measurable outcomes – how is success or failure defined and measured
- lacks urgency, no timelines or goals have been articulated
- is not part of a comprehensive state water plan

The public has greatly benefited from the regulatory requirements of the point source community. Four decades later water policy needs to establish regulatory requirements for the non-point source community. Requirements that set standards to be met, options for meeting the standards, tools for determining compliance and the cost of non-compliance.

DMWW is a public drinking water utility owned by the citizens of Des Moines and governed by a Board of Trustees. Des Moines citizens have entrusted the utility with the protection of their infrastructure and to diligently operate the utility in a manner that provides safe drinking water to approximately 500,000 people in Central Iowa.

Primary water sources for DMWW are the Raccoon and Des Moines Rivers and the infiltration gallery that runs adjacent to the Raccoon River. Land use in the Raccoon and Des Moines River Watersheds is overwhelmingly agricultural. About 1.7 million of the 2.3 million acres in the Raccoon River watershed are cultivated for corn and soybeans. Much of the corn-soybean system requires constructed drainage (agricultural tile drainage) to maximize yields. Application of manure and commercial fertilizers are transported in run-off events and through tile drainage. All of these factors have resulted in various consequences for water quality.

Contaminants of concern for DMWW are nutrients, bacteria, algae blooms, cyanobacteria, and disinfection by-products, the bulk of which are a result of non-point source nutrients in the source waters. Nutrients in water are necessary for healthy watersheds. But in high concentrations they can adversely affect aquatic life and human health. For a drinking water utility, increasing nutrient loads cause difficult and costly challenges at the source, in the treatment process, and at the tap.

It is not our intent to tell people how to farm or what they can and cannot do on their land. But it is our intent, to rigorously advocate for establishing a comprehensive nutrient reduction plan by first setting numeric standards to aggressively reduce non-point source nutrient contributions in Iowa's surface and groundwater resources. In a 2007 report by the Center for Agricultural and Rural Development (CARD) and Department of Economics, Iowa State University, Conservation Practices in Iowa: Historical Investments, Water Quality, and Gaps, it states, "Water quality indicators we (CARD) focused on in this study are nitrogen and phosphorus. ... In the model outputs, stream flow was estimated to increase in all watersheds, indicating that the existing conservation practices allow faster movement of water." When 80-90% of land use in the watershed is agricultural, these findings raise concerns regarding placement and effectiveness of current conservation practices. And, it only makes sense that to improve water quality in a watershed your emphasis has to be where it will be the most effective and maximize the prudent use of tax payer money.

Also in the 2007 CARD report, Conservation Practices in Iowa: Historical Investments, Water Quality, and Gaps, "We (CARD) estimated that

Name Linda Kinman
City Des Moines
State Iowa

Providing comment on the following sections:

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the statewide cumulative annual cost was about \$435 million for 7 major conservation practices on the ground and accounted for part of 1997 -2004 data sets." (The breakdown of cost figures by conservation practice is expressed in Table 3.) In other words, at least \$435 million dollars of taxpayer money has been spent annually over the last 15-20 years for voluntary implementation of conservation practices to protect Iowa's water and soil resources.

Monitoring trends in the Des Moines and Raccoon River since 1974 show the increasing trend of nitrate-nitrogen loading and concentrations. (Graphs will be e-mailed with written comments)

All waters in Iowa are "public waters and public wealth" of its citizens and is for the beneficial use of all citizens. It is the policy of the State of Iowa to protect existing water uses and to protect and maintain the existing physical, biological and chemical integrity of all waters of the state.

The Nutrient Reduction Strategy should include:

Numeric Nutrient Standard -

DMWW can concur with the scientific findings that one standard does not fit across the state. Soils, weather patterns, farming practices, and monitoring data all vary. However, the Gulf Hypoxia Action Plan includes a numeric standard and the proposed Nutrient Reduction Strategy also sets numeric standards.

All point source entities are required to meet the same statewide numeric standards. Wastewater discharges can vary from one city to another (i.e. Cedar Rapids versus Iowa City) yet each must meet the same prescribed discharge standard. Nowhere does the standard prescribe approaches for meeting the standard.

Monitoring may not be available for every stream in Iowa, but many including the Raccoon and Des Moines Rivers have been monitored extensively. Numeric standards can be set and while work begins in one watershed, monitoring can be focused on streams where additional data is needed.

- The Gulf Hypoxia Action Plan set a numeric standard of 45% nutrient reduction of riverine nitrate and phosphorus load.
The proposed Strategy sets numeric standards for nitrates at 41% reduction from non-point sources and 4% from point sources.
Through data analysis the state can set numeric standards statewide or by HUC 8 and/or 12 watersheds.
Integrated solutions on a watershed scale, and involvement of all stakeholders in the decision making is critical.
All crop insurance, conservation and funding programs administered by the state should require a total system approach to planning.
All installation of agricultural tile drainage systems and drainage district upgrades and maintenance should be incorporated into a total watershed system approach.
Waste water and storm water entities should require a total system approach to planning.

It is difficult for the average individual to see how these drainage systems differ. Are they different? No, they both manage water. (Drainage system pictures will be e-mailed with written comments)

Wastewater Treatment Plant Discharge -----Agricultural Tile Drainage
Point source.....Non-point source
Regulated.....Non-regulated
Location is mapped.....Location is not mapped
Treated discharge.....Non-treated discharge
Permitted with discharge limits.....Non-permitted with no discharge limits
Potential contaminants discharged.....Potential contaminants discharged
Are the same for both - nitrates, phosphorus, microbial, and pharmaceuticals

Integrated solutions on a watershed scale, and involvement of all stakeholders in decision making is critical to meet prescribed standards. It is

**Name** Linda Kinman**City** Des Moines**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

common knowledge that successful watershed projects are locally driven. By providing a nutrient standard to a watershed community it identifies the end result needed, and allows local decisions on how it can be achieved. This process needs to bring a sense of community and stewardship back into the demeanor of every landowner – urban or rural.

#### Compliance and Enforcement –

Compliance and enforcement maximize results. An effective compliance and enforcement process ensures fair, consistent, timely, and expected enforcement of laws and regulations and applies them to everyone equally. Environmental laws are the foundation for protecting public health.

- A nutrient reduction plan must include legal requirements to be met by all entities equally. Rules and regulations are only the first step, but they are the foundation for protecting public health.

- Compliance is step two. Without compliance, rules and regulations will not achieve the desired results. Compliance compels the majority to change behavior.

Compliance and enforcement affirmatively promotes compliance and identifies and imposes legal consequences on the minority who voluntarily choose not to comply. In any regulatory situation some people will comply voluntarily, some will not comply, and some will comply only if they see that others are penalized for noncompliance. Many people ask, “Would community and industrial waste discharges be protective of human health if it had not been for the Cuyahoga River fire in 1969 and the regulations that followed?” Would voluntary, incentive based initiatives have brought the Cuyahoga River or any other water body back to life? The general consensus is no.

Point Sources are required to comply with permit limits. Non-point Sources are not required to comply with anything – implementation is all voluntary. This is not a level playing field. By taking a watershed approach both entities should expect some penalty if the watershed nutrient standard is not achieved. An example is that point sources might receive a notice of violation and be fined by a pre-determined amount set in rules. A non-point source example is that they receive a notice of violation and lose all or some portion of their agriculture land tax credit which again would be pre-determined in rules. Fines and forfeited taxes would be placed in an account dedicated to watershed improvement projects and awarded through a competitive grant application process.

To reduce nutrients (both commercial fertilizer and animal waste), the state must measure what is being applied and where. It was stated at the public meeting presenting the Strategy in Ames, December 19, 2012 that producer’s identities must be protected. However, there were comments that it is possible that the amount of fertilizer and manure applied could be reported by watershed. A Nutrient Management Plan could be developed by watershed and should require:

- Mapping of all commercial fertilizer and manure applications by watershed.

- Identification of nutrient loads (commercial fertilizer and manure) the watershed can support and still meet the nutrient reduction standard.

- Assume all land has generous amounts of phosphorus and the only time it can be applied is when soil tests determine a phosphorus deficiency. The Strategy states, “The soil test levels being maintained often exceed those recommended by Iowa State University, which explains the high proportion of soils testing high and very high in the state as suggested by soil test summaries (Mallarino et al).”

#### Funding –

Funding for point source technology is limited to rate payers, State Revolving Loan Funds (which must be paid back), and limited grants from USDA-Rural Development. Non-point sources have multiple cost-share programs (EQIP, CRP, etc.), and producer funding. Additional new money must be secured to assist both municipalities with infrastructure needs and increased cost share for agriculture. If not, the state will remain at status quo.

Market driven approaches are attractive, but non-point to point sources has not been overly successful when tried in other states across the country, while point source to point source has had some success. How will Iowa’s approach be different to generate success?

#### Other –

Agencies should prepare annual reports of nutrient reduction progress by watershed. Results should be measurable – and meaningful and available to the public.

Social scientists should be engaged to determine why conservation practices are not implemented across the landscape.

Market the long-term value of conservation practices, to water, soils and producer income. (What are the influences – absentee landlords, amount of rental land, increased prices of crops, etc.?)

The proposed Strategy lacks credibility due to the dramatic differences between compliance by regulatory means versus voluntary approaches.

We strongly encourage support for development of a comprehensive nutrient reduction plan including numeric standards. Standards that protect Iowa’s water resources, promote economic development, and enhance the quality of life necessary to attract workers and jobs to Iowa. To truly go down the road together, both point sources and non-point sources have to be on a level playing field that emphasizes responsibility and accountability. We need to find ways to manage nutrients effectively, efficiently, economically and fairly.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **4** of comment #**319**.

**Timestamp** 1/4/2013 2:23 PM

**Name** Linda Kinman

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Sincerely,

Linda Kinman  
Public Policy Analyst/Watershed Advocate  
Des Moines Water Works  
2201 George Flagg Parkway  
Des Moines, IA 50319

CC: Chuck Gipp, Director, Iowa Department of Natural Resources  
Bill Northey, Secretary of Agriculture, Iowa Depart. of Agriculture and Land Stewardship  
Karl Brooks, Administrator, U.S. Environmental Protection Agency  
Thomas Vilsack, Secretary of Agriculture, U.S. Department of Agriculture

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #320.

Timestamp 1/4/2013 2:37 PM

**Name** Dan Rickels

**City**

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I think this is the best way yet to accomplish our goal with this voluntary approach with real science figures and results without finger pointing and needless money spent! I am glad we are working on this together with all departments as well as farmers etc!

**Name** John H. Wills**City** Spirit Lake**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

All-in-all, no real surprises here. This really seems to be the same thing repackaged. Is there a way that we can incorporate more specific game plans? Right now, as it stands what are we to shoot for? Some cover crops and conservation tillage? There are no acres required... just suggestions.

To get real, perhaps we could specify, for example, in zone 103 (Des Moines Lobe of the Wisconsin Glacier) that 45 percent be seeded to cover crops each year and all conventional tillage be converted to conservation tillage plus all conservation tillage be converted to a no-till system. Those are firm "goals" for us to hang our hat. Then we can break it down even further to counties or even townships. Give us a goal to shoot for as small units of government. Right now it just shows us some suggestions as to what can be done. No goals, no money to back it up, no effort to achieve anything.

Without these goals everyone will point fingers at everyone else saying they should do it. I work for the Dickinson Soil and Water Conservation District and if my District knew that it was responsible for coming up with 4,500 acres of cover crops this next crop season, we would work for that. With this plan the way it is, all we know is that we should shoot for cover crops, conservation tillage, streamside buffers, and wetlands (among other things).

I like the ability to be flexible but my suggestion is this...don't give us a goal of a number of acres of buffer strips...instead give an SWCD a goal of reducing X number of lbs of phosphorus and X number of lbs of Nitrogen. Do this for every county. Or we could even give a goal to each HUC 12 watershed for a specific amount of a pollutant to be reduced. Let them figure it out, if they choose.

Voluntary is ok, but how do we succeed if we don't have a goal? Let small government bodies set the program based on what is an acceptable practice in their county. Let them set up programs that work for them. If they succeed that is great. If they don't succeed give them help...or take it away from them until they prove they can succeed.

That is my suggestion for now. After much thought, I really think this plan can succeed but it needs to have some changes made and specified and localized reductions brought to the local level for that to happen. It won't happen on its own by some miracle. It will take someone to go out and educate and  sell these things to the landowners.

**Name** Keith Dexter**City****State****Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

Secretary of Agriculture Northey,

I sincerely believe that using science to target the best approaches in the most practical areas makes the most sense when compared to one size fits all regulation from the federal government.

Nutrient Reduction strategies, implemented locally and voluntarily on the most vulnerable land and watersheds have been proven to work in the past in different areas across the state. Coordinating efforts statewide, while measuring progress and reporting to the public seems like the most reasonable way forward.

I believe that Iowa farmers, when presented a practical plan that makes scientific sense while still allowing for viable agricultural production will voluntarily choose the right path 95% of the time.

To emphasize, I believe the key to voluntary implementation is statewide local coordination. If someone local comes to me because I am in x watershed in x soil type using x farming method and explains that using y farming method will drastically reduce nutrient entry into our streams and the Gulf of Mexico, I am likely to implement a plan, working with this local expert. I am likely going to keep my food production levels high as well.

If a federal agent from the EPA comes to my farm and forces me to implement some plan that was developed in Washington DC by an expert who grew up in a different state and doesn't understand modern production practices, it is likely that food output from my farm will fall, along with the value of my land. It is also very questionable that the practice mandated by an un-accountable federal agency will reduce nutrients either. Keeping the power to reduce nutrients with the individual and the local expert will have better results every time.

On my farm, the most important practice I have implemented has been using a finishing disk that would be considered a secondary tillage tool in place of more aggressive tillage practices in the fall on highly erodible land. This practice levels stalks while sizing residue and shows a little bit of black soil on the surface allowing for much faster warm-up in the spring. The key is to not tear out the root-balls of the previous year's crop. This does an excellent job of keeping soil in place.

Many years, no tillage pass is needed in the spring, even when growing second year corn.

I have also been spreading dry phosphorus and potassium with variable rate technology for many years. Within the next five years, I plan on implementing technology that allows for variable nitrogen application during side-dressing. This puts more nitrogen where it is needed, closer to the point of crop utilization, while allowing me to save money by reducing application rates where the marginal cost exceeds my marginal return.

The key to making this strategy work is to keep the strategy voluntary, allowing for local innovation, while utilizing the state of Iowa's ability to coordinate and educate. Keith Dexter

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #323.

Timestamp 1/4/2013 3:44 PM

**Name** Daniel Rickels

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

Thank You for helping with this nutrient reducing strategy. What a great way with all departments working together instead of spending money and POINTING FINGERS! Everything has a cost, of which I don't think is part of EPA's agenda. We would like to hold an informational meeting here in Jones County to help inform more farmers about this voluntary approach, of which we are working on. I've built terraces and put in waterways [even though the field is non highly erodible] just because I know it helps with erosion etc. I've also counter farmed more than the last owner just because I know it is better for all. Daniel Rickels



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #324.

Timestamp 1/4/2013 4:07 PM

**Name** Carole Simmons

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The Nutrient Reduction Strategy fails to adequately address the scope of the problem. To quote the Des Moines Register, the "public was shut out from preparation of the plan, but ag interests weren't." If voluntary measures were adequate to deal with non-point-source pollution, we would have seen progress by now in cleaning up Iowa's waterways. Instead, things are growing worse, and the Dead Zone in the Gulf is growing.

I wholeheartedly agree with Richard Doak: "Iowa cannot muster the political will to clean up some of the nation's most polluted waters. This business-as-usual attitude shows that state leaders have no long-term vision for our future."

Perhaps it will take the EPA stepping in to see that adequate protections for our waters are enforced.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #325.

Timestamp 1/4/2013 5:08 PM

**Name** Andrew Jenkins

**City** West Branch

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I don't have time to pick this apart right now, but disproportionately relying on point source reductions to offset the non-point source contribution is poor policy. It's great the PS can be reduced by 66% and 75% through technological advances, but let's see some real effort to have the largest contributors do their part too.

**Name** John Paule**City** Prole**State** Iowa**Providing comment on the following sections:****Executive Summary****Nonpoint Source****Policy****Point Source**

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In the Nutrient Strategy much is said about innovative approaches and technology. I expect this is similar to other plans that have been previously developed to reduce nutrient and sediment moving into Iowa's streams, rivers, and lakes. However if Iowa is going to get serious about reducing the runoff of nutrients and sediment from agricultural land, then Iowa and Federal Conservation Agencies need to get serious about using available technology. Use of technology can result in efficiencies while improving overall quality without the need to add agency staff.

In the past few months I have been working with private and public entities including the US Fish & Wildlife Service (FWS) to restore a wetland on my property. All entities, especially The Fish & Wildlife Service, have been extremely helpful and eager to participate in the project. FWS has been to my farm several times to gather survey data that has been used in the development of a mutually agreeable option for such a project.

About three weeks ago I was introduced to software developed by a small company, Agren, based in Carroll, Iowa. After being introduced to the software, I mentioned to Stan Buman, Vice President at Agren, that I was working with several entities including FWS to develop a wetland on my property. Stan offered to set up an online meeting and show me how he could develop different options using their WetlandBuilder software. Even though I had been working with the other entities for several months I was very interested in Agren's technology. Stan set up an online meeting. In just a few minutes, he identified my farm and where I wanted a wetland restored. In another 15 minutes he provided me with the first option for a wetland. It gave me a great pictorial view of what FWS had proposed. In the course of about 30 minutes Stan provided me with several more options and enhancements using this software technology. I was impressed with the report produced including schematics and aerial photographs, charts and graphs detailing the entire project including estimated costs based on market data. Far more information than I had received to that point from any of the other project partner entities. In addition, we were able to edit certain information specific to known costs and implementation decisions online and tailor the report.

After creating the wetland option and report, Stan asked me if I had any interests in other conservation practices. I indicated I was interested in cleaning out an existing pond and making it bigger. Again in just 15 or 20 minutes Stan was able to provide me with several options. And after the pond, Stan provided me with a plan for a Water & Sediment Control Basin to stop a gully from cutting back into my neighbor's field as watershed from from the neighbor's field was being used to support the larger pond size in the plan.

Within 90 minutes Stan gave me several high quality estimates for a wetland, a pond, and a water & sediment control basin. In addition to the project overview and estimates, he provided me with an aerial photo of how the structures and pool areas would look on my farm.

This would be a great tool in the hands of a public entity like the Fish & Wildlife Service. After seeing the Agren software used on my farm, it is beyond me why every conservation office in Iowa does not have access to this very affordable technology. If Iowa is going to meet water quality objectives, this software tool is a proven, easy-to-use technology designed to improve government agency effectiveness and efficiency, reduce costs, speed execution, and improve quality. In a financial environment where dollars for additional staff to support land and farm owners are stressed, use of this technology could really help out.

If Iowa is going to get serious about reducing the nutrients and sediment in Iowa's surface waters we need to get serious about working with companies like Agren to develop even more software programs to help landowners.

**Name** John Paule**City** Prole**State** Iowa**Providing comment on the following sections:****Executive Summary****Nonpoint Source****Policy****Point Source**

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If Iowa is going to get serious about reducing the nutrients and sediment in Iowa's surface waters we need to get serious about working with companies like Agren to develop even more software programs to help landowners.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #328.

Timestamp 1/4/2013 9:01 PM

Name Nick Roethler

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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This strategy or plan is a good start and a further step towards achieving a reduction in nutrients. It also brings to light that this process will not be easy, but it can be done with a variety of methods. With that being said lowans should get together, support this plan and use it as a place to move forward and work towards cleaner water, reduced nutruent transport, and environmental benefits that this strategy proves can be achieved.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #329.

Timestamp 1/4/2013 10:17 PM

**Name** Jon Rosengren

**City** Algona

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #330.

Timestamp 1/5/2013 7:19 AM

**Name** Jay Gunderson

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**  **Nonpoint Source**  
 **Policy**  **Point Source**

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Secretary of Agriculture Northey,

I support a science-based state nutrient strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. I use a certified agronomist to make all nutrient application recommendations. My farms are soil sampled on a rotating basis so I have current information available for my agronomist to make nutrient application recommendations. All nutrient applications (NPK, micronutrients & macronutrients) are based on current samples for the crop that will be planted that year.

In recent years I have evolved away from fall applied nitrogen to an in season split application of nitrogen. I apply nitrogen at planting and a later side dress application. I have also incorporated late spring nitrate testing into my operation to help fine tune nitrogen rates for my corn crop.

Another practice I have implemented is applying micronutrients, based on soil tests, matched to crop nutrient needs, at planting. I also have added foliar feeding of nutrients to my operation.

While I am not sure anyone can predict what advantages new technologies will provide in nutrient management, I intend to incorporate them into my operation over time. Jay Gunderson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #331.

Timestamp 1/5/2013 7:28 AM

**Name** Barbara Beaumont

**City** North Liberty

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The Strategy has been criticized as being lop-sided in allocating resources and effort in proportion to the problem areas. Municipal and urban sources of pollution, which are estimated to contribute 12% of the phosphorus and 9% of the nitrogen in the water, are given strict prescriptions. Conversely, agriculture, which is estimated to contribute 70% of phosphorus and nitrogen loading, is left to be mitigated by voluntary efforts of farmers and absent of regulation.

SINCE AGRICULTURE IS THE MAIN CONTRIBUTOR TO POLLUTION, WHY IS IT NOT SUBJECT TO REGULATION?



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #332.

Timestamp 1/5/2013 10:53 PM

Name Randy Caviness

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

On my 4,000 acre farm we use GPS 2 1/2 acre grids for nutrient management, i have installed over 4 miles of terraces, several of which i paid for on my own with out cost share, We use no-till on all of our crop acres and have for over 20 years, many of our soil samples show greater then 5 % organtic matter that hasbeen built up over the last 20 years from under 3 % in the 1980's.

Organic matter helps retain soild nutrentents and promotes water infiltration during heavy rains. Along with better root development promoting better crops

We use contour buffer and filter strips along creeks and side hills along with grassed water ways.

I had a demonstration plot on my farm along with the Iowa learning Farm at ISU to deminstrate no till and other conservation practices.

I beleive Farmers are best suited to make the right choices on there own farms when it comes to soil and water issues. Randy Caviness

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #333.

Timestamp 1/6/2013 9:58 AM

**Name** Tom Hauschel

**City** Urbandale

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I believe Iowa's nutrient strategy will work to achieve the targeted load reductions through voluntary practices that allow farmers freedom to develop customized solutions that fit the individual needs of their farm and farm ground, thus avoiding expensive and often ineffective mandatory regulations.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #334.

Timestamp 1/6/2013 11:26 AM

**Name** Lyle Stacy

**City** Brighton

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Agriculture must be made to comply with conservation plans. I am seeing too much recreational tillage. Farm Bureau (Farm Bureau Insurance) has too much power and money, they use this power and lobbying abilities to regulate conservation for a small percent of the farmers! Conservation and crop insurance must be combined to make some farmers stop destroying organic matter and eroding soil.

Iowa State University and agricultural publications have done an excellent job promoting what the benefits of reduced tillage can do. We need to make landlords aware that they can demand conservation practice on their rented land. I made that stipulation on our rented land with our renter.

On my travels this winter southwest Iowa is to be complimented on their reduction of fall tillage. Southeast Iowa would receive a D- for their reduction of fall tillage.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #335.

Timestamp 1/6/2013 12:51 PM

Name Cheryl Hannah

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Regarding the Iowa Nutrient Strategy : The strategy is too weak as it pertains to agriculture runoff. It does not include specific goals with time frames. Any good strategy would have these specific goals laid out. The strategy is unacceptable and needs to be revisited, revised, and done the right way. Thank you.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #336.

Timestamp 1/6/2013 3:09 PM

**Name** Loren Lown

**City** Pleasant Hill

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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January 6, 2013

Recently, I downloaded a copy of the Iowa Nutrient Reduction Strategy and printed it out as I still do not like reading from a computer screen. What I read was a disappointment to me.

I now work in the conservation field in central Iowa but for years worked for the USDA in eastern Iowa. As a worker in the field at the time of the 1985 farm bill, it was obvious that 90% of the farmers were waiting until the last moment to implement the modest requirements necessary to retain their eligibility to receive benefits under the legislation.

You do not have rules for those who obey common sense laws - you have them to force compliance by those who would not do so otherwise. Pollution of our waterways is an affront to all citizens of the state. Those who do so  do so knowingly. An expectation that an individual will act against their best economic interest simply because it is the right thing to do  is unrealistic.

Proposing voluntary compliance with suggested methods to reduce soil and nutrient runoff from our agricultural land is either extremely wishful thinking or an effort to avoid and delay meaningful reform.

There are exceptional individuals farming in our state that are truly stewards of their land and there are many who are  corn-mining . The stewards are already reducing erosion and farming as if what they own or manage is a resource for the future and there are those who value only short-term profits. The later need rules to guide them, and to protect all citizens.

Voluntary participation will not work. A plan without teeth will waste years when true progress could be accomplished, result in the loss of many, many tons of topsoil, and place those who are responsible stewards at an economic disadvantage.

Loren Lown

325 Christie Lane

Pleasant Hill, Iowa 50327

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #337.

Timestamp 1/6/2013 4:28 PM

**Name** Roger Dahlstrom

**City** Goldfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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What assistance is there if a progressive family wants to participate? Des Register article said money was available since this is for the General Welfare of the Public.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #338.

Timestamp 1/6/2013 4:47 PM

**Name** Jon C Hunstock

**City** Ames

**State** Iowa

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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I attended your recent Nutrient Reduction Strategy presentation in Ames at ISU last month, have read the document, and discussed the contents with professionals in ecology and sustainability and I am underwhelmed at the contents of this report for the following reasons:

- The program is entirely voluntary for farmers. You have neither the carrot nor the stick to motivate farmers to participate. My guess would be that those who are the most likely not to participate in a voluntary program are the very people who are most likely not to employ good conservation practices. Think back to the Cuyahoga River when it caught on fire—maybe the Mississippi won't burn, and the Delta won't spontaneously combust but that doesn't mean that there isn't a serious problem that needs to be addressed in a timely manner. You need to determine how timely is timely enough.
- You need to define and quantify the goals and articulate the strategies and mechanisms required to achieve the desired quantifiable results.
- Where are the timetables—with real dates—for measuring progress toward the improvements desired?
- What would be the direct and indirect costs to individual farmers to implement your recommendations, including cost-benefit analysis?
- And what funds are going to be made available to assist farmers? Direct payments, low interest loans, ...?

You have a "feel good" document that fails by not clearly delineating the necessary goals and steps to achieving meaningful success. We need to have a substantive policy which you have failed to provide.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #339.

Timestamp 1/7/2013 10:13 AM

**Name** Mike Wilson

**City** Dubuque

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I boat on the Mississippi River from Bellvue, IA north to St. Paul, MN. Each year with the Spring thaw and rains, the river rises to near or above flood stage. The Turkey River enters the Mississippi near Cassville, WI. Each time I travel past this area, especially during flood seasons, I am disturbed by the amount of poluted water that flows from the Turkey. Just above the Turkey, the water is much clearer than below. I also travel by car in this area and have noticed that crop and livestock farmers are allowed to till the soil and/or graze animals right down to the river's edge. There is no grassy area along most of the Turkey that could catch chemical and manure runoff from these farms. I assume that this is just what you are trying to study. Travel there and take a look. It is not pretty.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #340.

Timestamp 1/7/2013 12:52 PM

**Name** Wray Childers

**City** Durango

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I agree that control of nitrogen,phosphorus,phosphates and all deleterious organic and inorganic compounds need to be controlled in our watersheds, streams and rivers.

The goal should be to avoid or minimize the release of any man-made deleterious materials into bodies of water.

A positive step in this direction would be to monitor and enforce the improper storage and release of deleterious materials within mapped special flood hazard areas (SFHA's). As one example, a wood processing facility located approximately one mile upstream from my house at Graf, Iowa stores thousands of logs, and thousands of tons of sawdust and wood chips and other deleterious materials within a mapped SFHA and has had regular release of these materials into the Little Maquoketa River that subsequently drains into the Mississippi River during at least four flood events since 2002. As of today, there are thousands of logs and an unknown number of tons of wood chips and sawdust within the Little Maquoketa and Mississippi River Floodways for miles from this one Point Source.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #341.

Timestamp 1/7/2013 1:50 PM

**Name** Dan Bratrud

**City** Osage

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I think the summary is a great document. It is beneficial to have the scientific documentation to back up the conservation practices that we promote for implementation on Iowa's farmland. It is good to know just how many of what practices we need implemented to reach that "magic number" of 45% reduction.

This document may give our legislators the information to justify additional funding for the conservation practices needed to reach the 45% reduction but I see nothing in the strategy about the social acceptance of the scenarios offered even if the funding is made available.

Another concern would be the time factor. If funding is available and one of the scenarios is socially acceptable, is the taxpaying public aware of the amount of time that it will take to recognize any benefits. It is safe to say that any one of the scenarios offered in the strategy would take a minimum of 10 years to implement. Beyond that there will likely be a 20-30 year lag time before these practices produce the benefits needed to accomplish the reduction. Are taxpayers willing to wait for 30-40 years to get results from millions, possibly billions of their dollars invested?

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #342.

Timestamp 1/8/2013 11:30 AM

**Name** Becky Wehrman-Andersen

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Thank you for the opportunity to comment on the Iowa Nutrient Reduction Strategy. I am a hazardous materials consultant and work frequently with contaminated sites and hazardous chemical management. Recently, I was assisting a client with stormwater management that is contaminated with very low levels of lead. I investigated options and came across a product that we are currently putting into place to remove the lead contamination. I am so pleased with the analytical data the company, Filtrexx International, developed and the potential for a cost-sensible, effective solution, that I now represent the company in the midwest.

Filtrexx offers solutions for the filtration removal of heavy metals, petroleum products, bacteria and excess nutrients. This filtration is completed through the use of locally sourced, screened mulch with an absorbant additive that is placed in erosion/silt management mesh that meets highly defined, compliant criteria. These products are further defined at [www.filtrexx.com](http://www.filtrexx.com) I would encourage all interested parties to evaluate the potential use of the NutriLoxx products in particular to help resolve the concerns identified in the Nutrient Reduction Strategy. I will be contacting each agency independently to provide additional data and information. Please contact me at [becky@filtrexx.com](mailto:becky@filtrexx.com) if you have questions or to implement the use of this product. Thank you for your interest.

Becky Wehrman-Andersen

Filtrexx, International

Des Moines, IA

[becky@filtrexx.com](mailto:becky@filtrexx.com)

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #343.

Timestamp 1/8/2013 1:33 PM

**Name** David E. Johnson

**City** Granger

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I have worked for many years in the mining industry. I am keenly aware of the environmental requirements and restrictions for this industry and the efforts taken meet and exceed them. At the end of the day polluted water is still polluted whether it comes from a mining facility or a agriculture operation. For the sake of a fragile ecosystem, public health and limited water resources, agricultural operations must adhere to the same environmental rules as the mining industry here in Iowa.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #344.

Timestamp 1/8/2013 2:01 PM

**Name** John Klein

**City** Carroll

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

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I will keep my comments brief.

For the amount of time it took to study the water quality problem in our state, I am greatly disappointed that the results of the study are so wishy-washy. I hope that had nothing to do with political pressure coming from career politicians or large agricultural organizations. They seem to be bedfellows.

With numerous studies outlining the severe water quality problems that Iowa has managed to maintain, it is small wonder that the EPA is breathing down our necks for doing very little to make a difference.

Perhaps it is time for a change in policy and actually DO SOMETHING about our environmental problems. What has been done has been largely due to the federal government actions, not the state. As those financial resources shrink, as they surely will, it will be up to the state to take some responsibility.

I hope the policy makers and the legislature have the courage to stand up to their lobbyists powerbrokers and serve the majority of the people and natural resources of Iowa.

Thank you for taking the time to hear my concern.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #345.

Timestamp 1/8/2013 5:30 PM

**Name** Grace H. Zimmerman

**City** Anamosa

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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As a farm wife, I sincerely believe the science-based research in nutrient reduction would be working far better than the passing of stronger regulations. The voluntary efforts are using methods to reduce both point and non-point sources. It is the combined effort of Iowa Secretary of Agriculture, Bill Northey and the Iowa Department of Natural Resources Director, Chuck Gipp, with the aid of a science assessment by Iowa State University. It has a three-fold purpose to work with cities to reduce nutrient discharges, protect natural resources and offers methods for farmers to maintain agricultural productivity. This Jones County farmer owner congratulates the groups whom have worked to achieve this Nutrient Reduction Strategy.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #346.

Timestamp 1/8/2013 8:46 PM

**Name** Peter Bixel

**City** Kanawha

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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My name is Peter Bixel and I farm in Iowa along with being the Team Leader for SciMax Solutions. You can learn more about us at [www.scimaxsolutions.com](http://www.scimaxsolutions.com).

Nitrogen management by a calculator is not the way to start. This is an easy out and way too simplistic. This takes all the science out of N management. A graph from Iowa State's website \*(attached below) illustrates the extensive variability that exists between optimum N rates and yield. The optimum N rate only intersects a few of the given data points - use of an average optimum N rate provides a recommendation that is incorrect for the vast majority of fields or points in a field. There are other alternatives that can be looked at rather than making things simple .

Historically, application of commercially available fertilizers have been made uniformly across farm fields. Today it is known that fertilizer need by crops varies across a field due to soil variability. While lime, P and K fertilizer are commonly variable rate applied, N fertilizers are still predominantly uniformly applied due to a lack of accepted methodologies to make such applications. An approach to variable rate apply N ( SciMax Nitrogen) has been under development in Iowa for the past 8 years that utilizes the Illinois Soil Nitrogen Test (ISNT) and other supporting agronomic information. Growers in the north-central part of the state have been using the approach on approximately 15,000 acres for 5 years. Approximately 30 lbs of N/a, or more, have been cut from the usual farm N rate used on these program acres. Our data suggests that further cuts can be made. The results that we have seen with our growers illustrates clearly that uniform rate applications of N make little sense and strongly suggest that a key to reducing excess N applications in Iowa, and for that matter the Corn Belt, is to variable rate apply N along with utilizing stabilizers on all acres.

Thank-you for your time and efforts.

Sincerely,

SciMax Solutions and VH Consulting, Inc.

Peter Bixel

\*<http://extension.agron.iastate.edu/soilfertility/nrate.aspx>

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #347.

Timestamp 1/9/2013 9:11 AM

**Name** Katie Elgin

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please continue to adequately fund the state nutrient reduction management strategy so we can continue to improve production practices and efficiency. Thanks. Katie Elgin



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #348.

Timestamp 1/9/2013 9:13 AM

**Name** Steve Peterson

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

As a 4th generation farmer in Webster County Iowa I please urge your support of a science-based state wide nutrient reduction strategy that recognizes the importance of all voluntary conservation practices in order to meet the growing need of agriculture in the future.

I also urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy as well as ALL other programs concerning conservation and cost-share programs. Failure to do so will only hurt these conservation practices as has happened in the past.

On my farm I have used cost-sharing to build and rebuild terraces and the installation of waterways to help reduce erosion and nutrient runoff on my farm in Webster County. Steve Peterson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #349.

Timestamp 1/9/2013 9:16 AM

Name Tim Niess

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I am writing to encourage your support of the Nutrient Reduction Strategy proposed by IDALS, DNR, and ISU. It is a voluntary approach to this problem, which is quite honestly the major point of contention with environmental groups. They see this as an opportunity to finally punish farmers for perceived crimes against humanity. The reality is that, unless farmers feel they are a valued partner, in a well funded plan that shares the cost among all stakeholders; even a mandatory approach will be less than successful. Mr. Beaman and his supporters say this is a priority issue, but it appears cleaner water takes a back seat to their lust for a public trial of modern agriculture.

This is a good plan, put together by credible experts, and deserves to be funded properly. Tim Niess

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #350.

Timestamp 1/9/2013 9:20 AM

Name David Brandt

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

As a 3rd generation farmer in southwest Iowa, I fully support the Iowa Nutrient Reduction Strategy and urge you to adequately fund this program as well as other current conservation cost-share programs.

Over the past 60+ years my family has been farming in this area, we have invested tens of thousands of dollars of our own money on soil conservation structures. We have utilized many voluntary cost-share programs for soil conservation as well, especially terrace and dam building and repair cost-share programs. Most recently in the past 2 years. It is vital for any soil conservation program to have adequate funding to achieve the result we all need for our futures.

I urge you to support the Iowa Nutrient Reduction Strategy and fund this and other conservation programs. David Brandt

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #351.

Timestamp 1/9/2013 9:24 AM

Name Derrick Black

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

The strategy is a science and technology based approach developed by the IDALS, the Iowa Department of Natural Resources, and Iowa State University to encourage the adoption of voluntary conservation practices that will have the greatest benefit for water quality in the state. It uses ISU research to determine which practices are most effective when applied to Iowa's unique landscapes. The strategy outlines these efforts in a scientific, reasonable and cost-effective manner.

Farmers are protectors of their land. They want to continue to be part of the solution, but they know that new regulations aren't the answer.

I support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

You the lawmakers need to assure that this program is adequately funded , as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

Buffer strips and tillage practices including no till and strip till has been an good start on the farmers side in protecting the water sources in this beautiful state. The future of water quality protection in Iowa is in your hands! Thank you for taking action!

Sincerely, Derrick Black

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #352.

Timestamp 1/9/2013 9:24 AM

**Name** Alan Ibbotson

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I writing you to let you know that I support the science based state nutrient reduction strategy and voluntary conservation practices.

I hope that you support funding Iowa Nutrient Reduction Strategy as well as other cost share programs for conservation for the state of Iowa.

On our farm we follow many conservation practices to insure that our farm will be viable for years to come. Alan Ibbotson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #353.

Timestamp 1/9/2013 9:44 AM

Name William Sutton

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

As technology has advanced, so has the means and motivation for farmers to use nutrient strategies that not only help the environment, but simultaneously create an economic benefit for the farmer. One example of this is Ag Leader's Optrix crop sensor. It allows real-time diagnosis of the corn plant's nitrogen needs via infrared reflection, and enables variable rate nitrogen application as the applicator moves through the field.

Applying only as-needed nutrients through the use of Optrix is an economically viable option for farmers today. Even though there are varying levels of support for the environment among farmers, all farmers care about their survival, and will adopt technology as it benefits the bottom line.

I have used the Optrix for the last two years and look forward to using it again in 2013.

Consideration of a baseline nutrient loss value is also very important to an overall strategy. Virgin prairie with a tile line beneath it will show nitrogen losses that also end up in the Gulf.

We need a strategy that will not limit crop production, yet minimizes losses from the ecosystem. A voluntary approach is the only way to reach that goal as it puts the responsibility solely on the producer.

If the voluntary approach and the reductions that come with it are not enough to appease the EPA, then a clearer picture of states rights need to be defined.

Bill William Sutton

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #354.

Timestamp 1/9/2013 9:55 AM

**Name** Jon Passow

**City** Clare

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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With current public sentiment opposed to farmer/agriculture government benefits, I would guess the bulk of expense is going to be shouldered by the individual operator. Every scenario depicts lower yields with higher costs, big surprise there! The American consumer is already complaining about rising food costs, taking more land out of row crop production and increasing costs on the remaining acres isn't going to lend itself to happy grocery shoppers. It also gives a competitive advantage to non-US growers.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #355.

Timestamp 1/9/2013 9:59 AM

Name R Curtis Zingula

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

There is very good reason for the Iowa Legislature to support funding the Iowa Nutrient Reduction Strategy. As identified by Iowa State University, two of the most effective means of reducing nutrient loading in streams is by tile outlet bio-filters and cover crops. However, because these are relatively new conservation procedures, they are not widely understood let alone commonly utilized.

We can approach these and other conservation techniques in two possible ways; either by regulation or "carrot on a stick" incentives to couple landowners and resource authorities such as the NRCS.

Regulations would be broad based and therefore lead Iowa down the road of embarrassing failure. Last summer I was told by an environmental activist that farmers should be required to install stream buffers. However, the run-off on my farm already enters Indian Creek via two grass waterways, thus bringing into question the value of paying me some \$14,000 dollars to enroll in CRP grass buffers.

Every farm needs to have its own conservation prescription due to variations in soils, topography and farming techniques. Farmers have shown a solid improvement in soil erosion losses while working with the government to implement new practices. I believe, based on what those farmers tell me and my own preferences, that farmers will strive to keep expensive fertilizers on their farms, especially if they receive advice and financial assistance from people they already work with and trust.

With the help of the Iowa Legislature, we can make Iowa a bench-mark leader in nutrient conservation. R Curtis Zingula



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #356.

Timestamp 1/9/2013 10:00 AM

Name Joe Ludley

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

The time is right this year with the anticipated surpluses, adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

Twenty five years ago, I built terraces on my farm and within 5 years, there were terraces on both the farms that joined my land. Terraces and no-til make HEL land quite farmable. On another farm after I started no-til a bordering resident said previously with heavy rains the runoff would go over the street and now it doesn't even fill the culvert.

Voluntary conservation practices will be implemented with a little of cost share stimulus

. Please give careful consideration to a science-based state nutrient reduction strategy. Joe Ludley

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #357.

Timestamp 1/9/2013 10:03 AM

Name Nate Kitzinger

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

As you know Iowa's farmers are some of the best in the world. We are in need of your immediate support to fund the Iowa Nutrient Reduction Strategy program. This is a science based program that allows farmers in all geographic regions of the state to succeed in managing nutrient loss and have a positive impact on the quality of our natural water systems in Iowa.

The recommendations laid out in this strategy are based on sound research and scientific results from Iowa State University. Who better to lead a program to help us than one of the leading land grant universities? The researchers at ISU understand our diverse landscape and have developed methods for mitigating nutrient loss, into our waterways, that are best for specific regions of the state. We need to have the opportunity to begin to implement these strategies on a voluntary base because we will be able to find the most efficient way to get that done. When a regulation comes from the federal level it will be too broad and far reaching to be effective for those who will be affected. As a farmer in North-central Iowa I know that the conservation methods that work on our mostly flat land are far different than the practices that would need to be implemented in fields that are nearer to either of the major rivers on our East or West borders.

The economic strength of individual farming operations should also come into play in regards to the voluntary implementation. While a farm with less capital to invest is certainly not excused, they should have the opportunity to step into the process; whereas a more well-to-do operation may choose to make many changes at the same time and move forward. Both scenarios likely have the same goal of reducing nutrient loss.

By supporting the Iowa Nutrient Reduction Strategy you give our Iowa farmers the opportunity to set an example for the Nation and be leaders in this important arena. The benefits and results of a program that is producer led and implemented program will always outweigh something that is mandated and forced upon us by a regulatory agency. Nate Kitzinger

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #358.

Timestamp 1/9/2013 10:06 AM

**Name** David Stoullil

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Please support and fund Iowa Nutrient Reduction Strategy. It depends on VOLUNTARY cooperation by area farmers to protect our local water supplies. It has been proven that voluntary cooperation has and will continue to work. We do not need any more regulations thrown at us!! These practices are based on scientific research that have been proven to work. Thank You David Stoullil

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #359.

Timestamp 1/9/2013 10:08 AM

Name Gary Klejch

City

State

Providing comment on the following sections:

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<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

I request your support of voluntary conservation practices using science-based state nutrient reduction strategies. Mandated approaches don't meet individual needs or improve results. Farmers know the way to grow crops with the least amount of nutrient waste by using timely application, no-till, terracing, and contour farming. Practices used vary by farm and soil types, so having set standards will not achieve the best results.

Please fund the Iowa Nutrient Reduction Strategy and the state's conservation cost-share programs. They are proven as effective and cost efficient. Gary Klejch

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #360.

Timestamp 1/9/2013 10:14 AM

Name Maurice Busch

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

In today's pursuit of higher yields, it becomes imperative that we find workable means to raise these high yielding crops and provide the crop the nutrients necessary. The complexity as yields and nutrient needs increase will require good stewardship and an environment that will allow us to feed a growing world. Legislation will need to carefully weigh sound science based nutrient information to allow an ever changing farming evolution. Funding to promote good conservation practices will be necessary to help make this all come together. As an example, our farm has made extensive use of filter strips along the streams going through our property. They seem to be one of the best programs that exist to protect our water quality. The only change, I would like to see a mid to late season haying allowed to provide a more moderate amount of cover so that water would be more apt to go across the filter strip instead of running along side of it. Good conservation measures and a careful amount of regulation to allow an adequate amount of fertility to raise high yields, be it from manure or other forms of fertilizer, will need to be balanced. Maurice Busch

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #361.

Timestamp 1/9/2013 10:18 AM

**Name** Russell Meade

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am a fifth generation farmer from Johnson County and I want to ask that you support with funding a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain our current agriculture production.

Our operation involves three families. We have been implementing voluntary conservation practices that best suit the lay of our land and our production. We use no-till, contours, water ways and buffer strips along creeks. We have a cow-calf and feedlot operation that supports rotational pastures and hay with in the operation. We need to avoid a one size fits all approach. Real experience with your farm can sometimes prove official guidance wrong, we have been told on a map in a NRCS office to plant straight up hills because the map did not accurately reflect the true lay of the land.

We need adequate funding for the current Iowa Nutrient Reduction Strategy and for voluntary conservation cost-share programs. Russell Meade

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #362.

Timestamp 1/9/2013 10:23 AM

**Name** Steve Boerhave

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I'm writing to ask you to please support Iowa Nutrient Reduction Strategy. By support I also mean to adequately fund it and other conservation cost-share programs.

I currently use ISU nutrient recommendation for applying the correct amount of nutrients to my soil. 1 reason is because to cost of commercial fertilizer can run \$250 per acre but using the correct rate of manure I can cut my cost to \$80 per acre. (why would anyone over apply and trough money away)

I also use filter strips, CRP, tree planting and other programs to improve the environment. Steve Boerhave

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #363.

Timestamp 1/9/2013 10:27 AM

**Name** Rob Evans

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

i am in support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I want to urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. Rob Evans



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #364.

Timestamp 1/9/2013 10:29 AM

**Name** Jesse Willis

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Please support a science based nutrient reduction strategy for our state. We all want are waters to be safe for everything and everyone. As you all know agriculture is the main thing keeping our states economy going. By keeping cost sharing monies available this would help insure cleaner waters. Farmers are using buffer strips and other conservational practices to help ensure cleaner waters. Jesse Willis

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #365.

Timestamp 1/9/2013 10:31 AM

**Name** Grace Zimmerman

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

The Nutrient Reduction Strategy was worked out by the Bill Northey of the Iowa Dept. of Agriculture and Land Stewardship and the Iowa Dept. of Natural Resources with an added assessment by Iowa State University. This workable plan offers strategies for farmers to reduce nutrient loss and the IDNR will be cooperating with industries to reduce nutrient discharges from point sources to Iowa streams.

A voluntary program is surely more effective than a government run program which is not really in "touch" with those involved. Remember, funding will benefit all citizens of Iowa.

Hi, Bruce, the former Onslow student from Mrs. Z. Grace Zimmerman

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #366.

Timestamp 1/9/2013 10:36 AM

**Name** Jeremy Hollingsworth

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I farm with my dad in Southeast Iowa. Between the two of us, we farm about 1700 acres. We both have off farm jobs in order to make ends meet. Keeping regulations on farms to a minimum is very important to ensure that our way of life can be sustained.

I am in favor of a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. I urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. If these programs are not adequately funded, much needed conservation practices may not be able to be installed on the land.

On our farm, we have installed tile outlet terraces, ponds, grassed waterways, and grassed filter strips to help protect the land and other natural resources. Many of our farm neighbors have done similar practices to help protect their land. As farmers, we want to do the right thing to protect our land because our farms are not only a source of income, but also our way of life and an investment for our future generations.

Again, I urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs.  
Jeremy Hollingsworth

**Name** Robert Ostwinkle**City****State****Providing comment on the following sections:****Executive Summary****Nonpoint Source****Policy****Point Source**

Secretary of Agriculture Northey,

I wright to you today and ask you to please keep the water quality and nutrient reduction strategy for Iowa on a voluntary basis. More regulations are not the right approach. There are millions of dollars of conservation practices and projects that can reduce runoff that remain unfunded. The funding for these projects should found and funded. A voluntary approach will always look for new and better practices and never stop improving, regulations on the otherhand will recieve the l'm in compliance and nothing more need be done. I was told at a recent meeting with legislatures that water quality over the years shows no improvement. In dubuque county and surrounding counties there were a number of water shed projects done to improve water quality in creeks and rivers. I believe that an improvement was made, I also believe that to say there in no water quality improvement is wrong. I believe they are cherry picking results, you should be sure tests on water and runoff are done fairly and junk science is not used to pass a regulatory agenda that takes away or flexibility to make our own decisions. I have not meet any farmer who wants to pass on dirty water or a lesser quality of water to their children or grandchildren. Something on water quality you can do something on is this, over several years we have been using flouresent bulbs. The bulbs were to be costs saving and better for the enviorment, as bulbs failed we saved them for recycle. My wife and I decided time to recyle these bulbs they have been out for several years we called around looking to recyle them. We had a hard time to find anyone who would take them, there should be all kinds of drop sites afterall they are common in every home. I found out that a business must recycle them but a homeowner can throw them in the landfill. These bulbs have mercury in them, why in the world are they discarded like that where is the mercury going" I would like your thoughts on the amount going in landfills and why this is OK. Robert Ostwinkle

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #368.

Timestamp 1/9/2013 10:53 AM

**Name** Paul Campbell

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am contacting you to encourage your support to fully fund the Iowa Nutrient Reduction Strategy. I know there is never enough money to go around but we have first hand seen the benefits of installing properly designed waterways and terraces on our farm.

There has been a lot of work done but there is more to do. Technology is always changing we need to keep up so we can pass the land on in better condition than when we started

Thanks for your time and future efforts on this matter. Paul Campbell

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #369.

Timestamp 1/9/2013 11:19 AM

Name Jeff Cuddeback

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am concerned that, eventually, the EPA will descend upon our state and decisions better made by Iowans who understand production agriculture will be superseded by those of bureaucrats in Washington, D.C. Therefore, I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. Farmers, including me, will willingly sign up for these programs. These programs, in addition to conservation tillage practices employed by the majority of farmers in my neighborhood, have become effective tools in reducing soil erosion and nutrient/chemical run-off. Jeff Cuddeback

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #370.

Timestamp 1/9/2013 11:32 AM

Name Bret Seipold

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support reducing nutrient levels on a voluntary basis that is based on sound science. That is how I farm. I don't put on any extra and don't want to lose production by not putting on enough. I maintain terraces and no-till to keep soil and nutrients in my fields.

Presently all N,P & K are spread over the top and I have done that for 21 years. Next year I want to try injecting NPK into the ground in the fall in one trip. I suggested that option to my co-op manager and he said that is a very good program. I will either try it on all or part of my acres next fall if the correct conditions exist. I should have even less nutrient loss and better crop utilization with this change.

I ask that the Iowa Nutrient Reduction Strategy and other state conservation cost-share programs receive adequate funding. Most years these programs have been well funded, but lately some conservation projects have been delayed while waiting for cost-share money. I have benefited from cost-share to build terraces and install drainage tile a few years ago and would like to have it available in the future if the need arises.

Using sound science to find the best way to utilize costly nutrients and keeping them out of the water helps everyone as we continue to find ways to feed an ever growing world population. The producers will voluntarily do their part! Bret Seipold

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #371.

Timestamp 1/9/2013 11:36 AM

**Name** Kurt Steward

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I believe that the introduction of the Nutrient Reduction Strategy is a great thing and I applause those for the idea.

Who not better to ask than the farmers that manage the land.

We as landowners and farmers find believe that it is a great practice to conserve the land we live on use to produce food for the world. We take great pride in doing so.

We have incorporated many conservation practices into our family farm and plan to continue. We have recently redone tiling projects, reshaped water ways, cleaned out terraces, and use buffer strips along water ways. We want the nutrients to stay on our land to improve our crops not see those products be washed away.

I hope you can support this project as I see it as a great cause for our environment and our economy by not bringing on unnecessary government regulations. Kurt Steward



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #372.

Timestamp 1/9/2013 11:45 AM

**Name** Randy Christensen

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Express your support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

Urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

Share voluntary conservation practices you've already implemented and those you hope to implement in the future to benefit your farm and the surrounding environment. Randy Christensen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #373.

Timestamp 1/9/2013 11:53 AM

Name Van Meek

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support the science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge you and other state lawmakers to fund the Iowa Nutrient Reduction Strategy adequately and also the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

I have enrolled in the CRP program, and installed ponds. In the future I plan to participate in the Little Lick Creek watershed project.

Thank you/ Van Meek

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #374.

Timestamp 1/9/2013 11:56 AM

Name Steven Thompson

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Conserving our resources is important to everyone. Finding the best ways to do that in farming while working to make a living has to be done on an individual basis because the soils, management skills, resources, and financial condition of every farm are different.

I have read the Iowa Nutrient Reduction strategy and believe it offers a good approach to achieve it's goals. Several conservation practices have been evaluated to determine the effect they have on nutrient loss. Research needs to continue to fine tune this information for different soil types and environmental conditions.

I have planted some cover crops for three years. I do it because I believe it will improve my farm. However, the limitations of time and money can make it hard to do as much as I would like to. Some limited financials incentives could help me do more or help someone else try something new.

Iowa's farmers have done many things to conserve their soils while they provide food for this state, nation, and world. If this plan will require greater efforts and costs from them, some cost share funding should be provided.

Thank you for your consideration. Steven Thompson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #375.

Timestamp 1/9/2013 11:57 AM

**Name** Frank Klahs II

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I support a science based nutrient reduction program that includes voluntary conservation practices. I own farmland and it provides my income so I do everything possible to conserve my agricultural business. I have filter strips on all land next to creeks. I don't till bean stubble. I do minimum tillage on the stalk ground as well. I apply a reasonable amount of fertilizer, pot ash and phosphates.

Farmers can do this voluntarily and that is best. More regulations will not fix the problems that certain individuals and groups have been talking about. Frank Klahs II

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #376.

Timestamp 1/9/2013 12:04 PM

**Name** Paul Gieselman

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I strongly support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge you to adequately fund all available conservation and Nutrient Reduction Strategy programs that are available.

My farm currently uses conservation buffer strips as well as a multitude of terraces and tiles. We performed expensive maintenance on some of these structures this fall. No funds were available to costshare this maintenance where in the past it was readily available. I have explored nitrogen reduction structures and silt capturing ponds for my future conservation practices. Paul Gieselman

**Name** Marian Riggs Gelb**City** Des Moines**State** Iowa**Providing comment on the following sections:** Executive Summary Nonpoint Source Policy Point Source

I am compelled to write to comment on the recently released Iowa Nutrient Reduction Strategy. Having been involved with an environmental non-profit organization which attempted to get information about and have input on the Strategy over the two years that it was being drafted, behind closed doors with a secrecy protocol more stringent than most national security issues, I had to laugh out loud when I read in November that it was jointly drafted by IDALS and DNR. As the Des Moines Register appropriately noted, the people at DNR responsible for implementing their part of this strategy had not seen the report, let alone had an opportunity to have input on its creation. So why was I surprised that an environmental advocacy organization would not be allowed to have input? Because that is not how public policy is supposed to be created in Iowa. We have a rich history of looking at issues from all perspectives with ALL of the stakeholders involved having an opportunity to have input in order to create policy that is a compromise and can be embraced by everyone involved. It is obvious, given the nearly direct quotes from the Farm Bureau policy statements that showed up in the Strategy, that only one stakeholder was allowed to have input into this proposal-that of the large, agri-business community.

As a result, this strategy maintains the business as usual scenario that has a stranglehold on Iowa and will not even begin to actually address or solve our water quality issues.

Science has demonstrated that more than 80% of our water quality problems are the result of run off from our agricultural lands. We have tried the all-voluntary approach for farm conservation programs to stem this problem. It has not worked. Our impaired waters list continues to grow, algae blooms are prevalent and people are leaving the state to recreate-taking their dollars with them-dollars that could go a long way towards boosting our rural economy.

The strategy fails to set any kind of long-term or short-term goals for water quality improvements or timetables by which these goals should be achieved. What kind of a Strategy doesn't have goals and metrics to measure them by? How will we know if the strategy is successful without these goals and these timetables?

Iowa State University participated in the preparation of this Strategy by reviewing the effectiveness of currently available conservation strategies and their impact on water quality. Pardon my cynicism, but Iowa State is firmly in the pocket of Farm Bureau and the other large commodity organizations that fund the majority of its research now that public funding is nearly non-existent. We all know that it is not prudent to bite the hand that feeds you, so any science out of Iowa State is suspect to begin with and filtered to support its funders before it is made available to the public. This is another topic for another time, but this kind of bias is shameful coming from a land grant institution (whose leadership has done nearly everything in its power to stifle or silence the Leopold Center on Sustainable Agriculture-whose findings and research could definitely help solve our water quality problems.) The impotency of Iowa State and its scientific findings are evidenced by that fact that their findings are reduced to suggestions not policy recommendations, and the Policy section of the strategy does not propose a combination of these practices that Iowa farmers should implement or, again, any kind of goals for implementation or timetables. IDALS says that is because there is not a one-size fits all solution for our landscape. I understand that, but there are only so many conservation strategies out there and I think we have a pretty good idea where those are and are not effective. IDALS' hesitation to actually make any real recommendations underscores the true intent of this two-year waste of time - the fewer changes the better for Iowa's agribusiness community and to hell with Iowa's citizens who own these waterways and have a right to expect that farmers do what they should to keep them clean.

We wouldn't let a manufacturing company on one of our rivers dump into the river without some oversight and its time that the public and Iowa's decision makers stood up to Goliath and let them know that we won't take it any longer! We want state government leaders to explain how they are going to establish accountability with this strategy and how they intend to measure whether or not it is being effective. Public money has gone into the creation of this plan and supports the conservation efforts that it suggests. We have a right to know whether our money is being well spent. My bet, with this plan, it is more money down the manure pit and continued poor water quality in Iowa.

With the Best of Intentions,

Marian Riggs Gelb

2300 Thornton Avenue

Des Moines, Iowa 50321

515-229-3712

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 2 of comment #377.

Timestamp 1/9/2013 12:08 PM

**Name** Marian Riggs Gelb

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #378.

Timestamp 1/9/2013 12:16 PM

**Name** Michael Turnis

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please support the Iowa nutrient reduction strategy, not only by funding, but the adoption of voluntary conservation practices to aid in the completion of these practices. Michael Turnis



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #379.

Timestamp 1/9/2013 12:19 PM

**Name** Walter Hommer

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices. As a supporter of Ag and a voter in your district I urge you as a state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy. In the past failure to properly fund these programs has delayed several conservation programs. Take time to think what's right and wrong. Walter Hommer

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**380**.

**Timestamp** 1/9/2013 12:50 PM

**Name** Mark Schwery

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I hope you lawmakers adequately fund the Iowa Nutrient Reduction Strategy, as well as the other state conservation programs. Failure to do so has really hurt these programs in the past. On our farm we have buffer strips on both sides of the creek for the past 12 years and it has really helped save soil and reduced run-off. These programs are good for us and the state. Thank you in advance. Mark Schwery

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #381.

Timestamp 1/9/2013 1:12 PM

Name Jason Russell

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

Soil erosion has dramatically been reduced in the last 20 years, this isn't by accident. Many farmers have voluntarily implemented their own nutrient reduction strategies to save money on inputs and improve soil health. On our farm we use precision technology to produce more crop with less nutrients. We also use reduced and minimal tillage with cover crops and grass waterways to all but eliminate soil leaving our farm. These and other items are becoming more common as other farmers see that they work. I urge you to consider expanding these and some new methods by showcasing the practices that work and help fund them. Forcing changes to occur rather than incentivising would be difficult and dictatorial. Science based methods will ensure we don't jeopardize productivity and profitability of farmers. Jason Russell

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #382.

Timestamp 1/9/2013 1:15 PM

**Name** Kyle Holthaus

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

Hi, my name is Kyle Holthaus , my family and I have a small farm.We raise vegetables ,sheep, chickens, and I manage a modern hog barn.

I take great pride in the conservation I do on my farm. I leave grass buffers on all of my fields as well as leaving waterways.

I want to ask that you support the voluntary nutrient reduction strategy.Science needs to be used in the best measure to move forward.This with fund cost share programs are the best for all, and will prevent a one size fits all ,which would not be good for my small farm. Kyle Holthaus

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**383**.

**Timestamp** 1/9/2013 1:34 PM

**Name** Joy Goins

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

As a livestock producer, I support a science-based nutrient reduction plan. There is no one more concerned about the environment than farmers. If lawmakers will adequately fund the program, farmers can place conservation practices that would protect water quality on their farms. Those practices would also benefit large areas of our nation. On our farm we already have built buffer strips, silt collection terraces, and are using cover crops to conserve the environment. If there were funds available, we would place more environment protecting practices in place on our farm.

Please support legislation implementing voluntary practices and funding for the implementation. Thank you for your continued support for agriculture. Joy Goins

**Name** Jennifer Gardner**City****State****Providing comment on the following sections:****Executive Summary****Nonpoint Source****Policy****Point Source**

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Secretary of Agriculture Northey,

I currently own, live and work on a Heritage Farm, which means it has been in my family name for over 150 years. A Gardner settled on the very land that I live on in 1843, even before Iowa was officially a state. Farmers live on the land because they love it. It is hard work and often times, for very little monetary profit, but farmers continue to do it because they love the land and they enjoy knowing that they are doing something that can be passed down from generation to generation.

With that in mind, farmers take care of the land based on science and research. They do not go off on a "theory", only to find it isn't workable, nor does it have the success rate it is advertised to have.

Many times, people that live in a city, on concrete and have no experience with the land, water, or weather, try to make policy to "help" out "dumb farmers".

Farmers work with the land, water and weather every single day, and they KNOW what works. To assume they do everything for money, and do not care about the land or natural resources, is to say every politician is bought by special interest groups and looks out only for their personal interest. I hope that is not correct.

Please support research based policy that will allow for voluntary conservation practices so that farmers can continue to provide safe food to the world, as well as preserving the land for future generations.

Thank you. Jennifer Gardner

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #385.

Timestamp 1/9/2013 1:57 PM

Name Jimmie Smith

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I very much support a science and technology based approach developed by the Iowa Department of Agriculture and Land Stewardship (IDALS), the Iowa Department of Natural Resources (DNR), and Iowa State University (ISU) to encourage the adoption of voluntary conservation practices that will have the greatest benefit for water quality in the state. It uses ISU research to determine which practices are most effective when applied to Iowa's unique landscapes. The strategy outlines these efforts in a scientific, reasonable, cost-effective manner using voluntary practices, and is supported by Farm Bureau members.

Please adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. Jimmie Smith

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #386.

Timestamp 1/9/2013 2:06 PM

Name Amy Echard

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

As you are well aware, the hills of Clayton County are beautiful; yet, those very same slopes cause great difficulties for farmers. We are one of those lucky farmers and hope to remain that way for quite some time. That is why I'm wondering how you perceive the budget item to adequately fund the Nutrient Reduction Strategy or the state's cost share programs for conservation"

Budgets are at the forefront of every discussion; however, the state's nutrient reduction strategy, in conjunction with a balanced voluntary cost share program, approach this conservation issue in a sound manner.

One example of this great program was on a farm located on the hills of Volga. We spent countless hours to coordinate with Cindy Mensen from the County FSA office and Pat Schaeffers from the NRCS office to propose adequate buffer strips and laid out planting contours that can be incorporated into the CRP program on a farm where slopes were an issue. By doing this we: 1) Effectively managed the water and nutrient run off to preserve its nature, 2) Were compensated for land that was taken out of production and effectively managed the crops that were planted, 3) Enhanced the longevity of the land and the surrounding environment.

I hope you are able to take the time review the funding of these projects, to ensure a balanced budgeting approach, that meets the conservation needs, without over regulations! Amy Echard



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #387.

Timestamp 1/9/2013 2:34 PM

**Name** Paula Ellis

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am writing you in regards to the nutrient reductions strategy. I support a science-based nutrient reduction strategy that recognizes the importance of conservation practices.

Please support and fund the Iowa Nutrient Reduction Strategy as well as other state conservation cost-share programs.

I believe in conservation practices. We have installed several terraces, buffer strips and grass waterways on our farms with conservation money. As of right now our county has a 5 year waiting list for state money funds to go towards a terrace project. It shouldn't be that long of a wait for a farmer wanting to protect there soil. I urge you to adequately fund the Nutrient Strategy and other conservation cost-share programs. Paula Ellis

**Name** Devon Murray**City****State****Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

Secretary of Agriculture Northey,

As a young farmer in North Iowa, I fully support a science-based state nutrient reduction strategy. For the future of Iowa's most recognized asset, farming, voluntary conservation practices are a necessity. I believe the use of conservation practices help farmers save money on inputs in the long run and increase their return on investment (crops). By adequately funding things such as Nutrient Reduction Strategy programs and other conservation based strategies, spreading knowledge and helping farmers implement strategies to reduce, specifically N and P contents through leaching and erosion would greatly benefit both the farmer and the environment.

On my farm, I have implemented no-till practice on acres that have a long steep slope to them. I maintain a corn and soybean crop rotation with conservation tillage, leaving more residue on top. I believe in timing anhydrous after the 50 degree mark in the fall to help reduce leaching and also have started going to more of split nitrogen application on my corn following corn acres, such as applying a little less in the fall and coming back in June with a sidedress bar and putting more liquid nitrogen on after corn is a few inches tall. I have and continue to up keep buffer strips on acres that border streams and rivers to help reduce erosion, as well as continue to build more waterways in places that need one to help alleviate erosion from the field to the ditches, streams, and etc. I plan to continue these practices and advance my approach to conservation practices to take my yields to the next level and do my part to help the environment.

Thank you for your time. Devon Murray

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #389.

Timestamp 1/9/2013 3:15 PM

**Name** Chris Green

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

Please support the state nutrient reduction strategy that was developed by Iowa Dept. of Ag, IDALS, Iowa DNR and ISU. I believe that the voluntary conservation practices will be easily adopted by Iowa farmers. Just look around at the practices that farmers have adopted without mandatory conservation practices. I currently no-till where I have erodible soils. I am looking into cover crops for 2013-2014.

Please support and fund this strategy plan and other conservation plans that are in need. Chris Green

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #390.

Timestamp 1/9/2013 3:19 PM

**Name** Norman Fleagle

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

It is important to maintain funding for the conservation programs to maintain control of excess run off of water and loss of soil. Most of the water runoff in Warren County goes to Red Rock lake and so farmers volunteering to maintain the conservation efforts is critical to water quality.

By keeping the control of water runoff, it keeps much of the nutrients in place instead of running off and requiring more to get crop yields.  
Norman Fleagle

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #391.

Timestamp 1/9/2013 3:29 PM

**Name** Clinton Rubey

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I am in favor of and believe in the encouragement of voluntary implementation of conservation practices that improve water quality. You will attract more bees with honey than you will with vinegar.

I have installed terracing and grass water ways on my land even when what needed doing did not qualify for government cost share. I have observed other land owners doing the same in order to protect their land.

Farm land owners realize land ownership is a long term investment and they know they must maintain the land to protect nature as well as their financial investment. Clinton Rubey

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #392.

Timestamp 1/9/2013 3:34 PM

**Name** Rex Waller

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

Fund the Iowa Nutrient Reduction Strategy, as well as other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

The largest wastewater treatment plants need special attention. Rex Waller

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #393.

Timestamp 1/9/2013 4:24 PM

**Name** Rodney Faris

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost share programs. Failure to adequately fund these programs in the past has delayed needed conservation projects.

We already have many conservation practices in place on our farm and would like to continue to put more in place. We would like to have adequate funding in order to do this.

Please support the Iowa Nutrient Reduction Strategy so all farmers can implement conservation practices. Rodney Faris

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #394.

Timestamp 1/9/2013 4:34 PM

**Name** Lenny Watts

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I would like to ask that you would support voluntary conservation practices. The nutrient Reduction Strategy should be science-based. I would like to have support on the cost share as well. In Iowa we have a lot of different soil types as well as slops. Using a one size fits all approach is not what we need for better water quality. Thank you for your support. Lenny Watts



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #395.

Timestamp 1/9/2013 4:42 PM

Name Waylon Brown

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

I am sending this message to express my support for a science-based state nutrient reduction strategy. I feel that this needs to recognize the importance of voluntary conservation practices and it also needs to maintain agricultural production.

In order for any program to succeed it needs to be adequately funded. I urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost share programs.

We have implemented many conservation practices voluntarily already some of them are as simple as no-till practices, and rebuilding the water ways in our fields. We have also taken advantage of the technology that is "at our finger tips" we use soil nutrient maps to see where we need to apply nutrients and where we do not. We are able to apply the nutrients in the soil where only the plants can reach it. Even the auto steer that we use helps with nutrient reduction because it eliminates overlap of product.

My family has operated a farming operation for five generations, we care about the land natural resources and wildlife that surrounds us.

The state of Iowa has the opportunity to be a leader and not a follower in these areas. Again I urge you to support a science based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.  
Waylon Brown

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #396.

Timestamp 1/9/2013 4:57 PM

Name Adam Hansen

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please support the Iowa Nutrient Reduction Strategy developed by ISU, IDALS, and the DNR. As producers, we should all be conscious of our soils and what we put in them. I support this plan and will continue to utilize the measures our farm already does. We spring apply our NH<sub>3</sub>, use no-till to conserve soil, nutrients, and water. We are also in the CSP program and use filter strips along our creeks. I've also been looking into strip-till to cut down on fertilizer usage.

Please allow funding for this project and the other conservation cost-share programs. More farmland cannot be made, so we must be able to protect what we have. Adam Hansen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #397.

Timestamp 1/9/2013 5:22 PM

**Name** Mark Keast

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Iowa State University. That is the first thing that pops into most folks minds when they have a agriculture/science question.

Science should be the guiding factor when planning conservation issues. When producers have guidance from a respected institution such as ISU, they usually happily participate.

Conservation practices vary region to region, even mile to mile. Mark Keast

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #398.

Timestamp 1/9/2013 5:24 PM

Name gary rayhons

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

The State of Iowa needs to adequately fund projects that benefit the state's air and water. We need a science-based nutrient reduction strategy that recognizes the important strides Iowans have made in voluntary conservation practices. Along with that, the importance of funding the state's cost share programs that benefit conservation. Past funding problems have greatly delayed much needed conservation projects in the past. As a commissioner for our county soil and water board I have watched the dollar amount spent on conservation funding drop over the years, with limited funding it makes it harder to fund much needed projects that benefit our state's great land. In closing, I ask you to adequately fund the Iowa nutrient reduction strategy and other conservation cost share programs that benefit our state. gary rayhons

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #399.

Timestamp 1/9/2013 5:41 PM

**Name** Derek Mullin

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I support a science based state nutrient reduction strategy. Research that is done will be able to guide conservation practices. Properly funding the nutrient reduction strategy is necessary to be successful. On our farm we voluntarily try to do what is right for conservation practices. This includes terraces, waterways, buffer strips, split nitrogen applications and cover crops just to name a few. Derek Mullin

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #400.

Timestamp 1/9/2013 5:54 PM

**Name** Larry Harrah

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Out of concern I write you today, I feel we can and need to do a better job of Nutrient Management in regards to off target contamination. With that said I also feel this needs to be researched to lengthy extents in order to come up with a plan that is the best for everyone (the Big Picture) that this subject affects. If hasty decisions are made with out proper research this will have equally negative affects that I feel don't need to happen. I feel the State should help fund extensive research that will give us the best answers to maximize crop growth but also minimize off target contamination and at this point I don't feel anyone has the right answers. Larry Harrah

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #401.

Timestamp 1/9/2013 6:09 PM

**Name** Tye Rinner

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I urge you to support a science based decision on the nutrient reduction strategy, not an emotional decision. If cost share programs exist, farmers just love to add more conservation plans to help the environment. I have seen this first hand in my own neighborhood. I have built terraces on my own farm and will build more as funds allow. I am also highly in favor of a volunteer based program as well because nobody like being forced to do things that will cost them money. Tye Rinner

Name Carol Miller

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

Secretary of Agriculture Northey,

As a farm wife, I have experienced the many changing weather events and how it affects the land and surrounding areas where we farmed over the years. The only certainty in the every changing weather events is uncertainty. Farms that had excellent high producing yields could be taken down to its knees [more or less] as millions of gallons of water flowed across it surface taking with it valuable top soil and depositing a sandy mixture of soils along with debris. Years ago our Skunk River farm was a learning experience and provided a wide range of learning opportunities that prompted us to enter into a conservation land exchange program. Conservationists are happy with their acquisition and so are we.

It is because of our experiences I encourage our lawmakers to adequately fund the Iowa Nutrient Reduction Strategy as well as the state's other conservation cost-sharing programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

One does not realize all the differences in farming first bottom, second bottom to highly erodible land until you experience it. While there are good opportunities for large harvest yields there is the potential to have multiple opportunities for replant and also crop failure all within the same crop season when you farm river bottoms.

Through the years we have participated in installing grassed waterways, terrace repairs and also filter strips next to several creeks. Conserving our land is the only way of farming it. Once your soil leaves the farm it belongs to someone else. Best Management Practices and Land stewardship is very important to every farmer and I fully support the opportunities to cost share expenses in different programs offered. I would also like to encourage Iowa to continue their cost share conservation programs and continue to increase the amount of available monies. Demand for funds has exceeded the availability of funds available by over \$100 million last year which demonstrates that Iowa farmers are willing to do more. However those cost sharing funds need to be guided by the Iowa Comprehensive Nutrient Strategy.

Iowa's farm land has hundreds of different soil types covering millions of acres of land with varying topographic levels from flat first bottom to highly erodible and as different corner to corner, east to west and north to south as imaginable. Neither farm is the same as the neighbors yet all greatly valued by their owners. As many Iowa farms are family owned, passed down to next generation or just recently purchased much can be learned from their owner who has walked the land, inspected each acre and invested in its maintenance and will tell you it's good dirt. Carol Miller



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #403.

Timestamp 1/9/2013 6:44 PM

**Name** Dan Shore

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Let's let the farmer do the conservative practices and leave the others out of it Dan Shore

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #404.

Timestamp 1/9/2013 6:47 PM

**Name** Bill Couser

**City** nevada

**State** iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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as a farmer-cattle feeder in this state, our family understands the words environment, sustainability and conservation. Every day we practice these words and many more on our farm. As a farmer why would i ever want to put something on my land that would run off. it has to do with economics and when we apply we want to use it all. we don't need more regulations and laws and will help even our neighbors to understand what this really should mean to us if it is kept voluntary and not mandatory. mandatory always brings a cost. our family will continue to spread the word and what we need to do.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #405.

Timestamp 1/9/2013 6:54 PM

**Name** Peter Wicks

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am a farmer in Dallas County, Iowa. With my own money and equipment I have built and installed many waterways and other conservation practices over the years to protect Iowa's waters. These were done voluntarily, not because some government agency was forcing it down my throat.

I urge you to support voluntary means like the Iowa Nutrient Reduction Strategy to help with water quality. Government "one size fits all" mandated practices only generate hostility. This is a well thought out and researched plan.

Please support funding for this program as well as other conservation cost-share programs. Peter Wicks

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #406.

Timestamp 1/9/2013 7:11 PM

**Name** Robert Holschlag

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I don't believe that we need more regulation on conservation practices. I do believe we have some great practices in place already. One being the CSP program another the CRP program , great voluntary programs. I am currently involved in both. That CSP program is the best program I've been involved with, it keeps fertilizer usage in line with yields or crop removal. It also addresses timing of nitrogen applications, manure credits, etc. I feel we have some very good programs to choose from. I would like to keep these programs my choice, and not be told what will work best on my farm. Robert Holschlag

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #407.

Timestamp 1/9/2013 7:26 PM

Name Dustin Sage

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

As a farmer I support a science based nutrient reduction strategy that uses voluntary conservation practices. Voluntary conservation practices have already shown us that they can be both effective and cheaper to implement than a "one size fits all" regulatory approach. By combining voluntary conservation practices with a science based approach I foresee an effective way that we can both reduce the impact we all have on the environment and still maintain the agricultural productivity of Iowa's farmers without more regulations.

Both as a newly elected Soil and Water District Commissioner and as a farmer I see a lot of voluntary conservation projects being done by the farm community, but I also see that the amount of projects that people would like to do exceeds the amount of money available for these projects. Failure to fund these programs in the past has delayed many of these projects that have the ability to help Iowa achieve the goals set forth in the Nutrient Reduction Strategy. I ask you to fund Iowa's Nutrient Strategy and other state cost-share programs so that we can continue the great work that we have done in cleaning up Iowa's waters.

On our farm we have done a number of conservation practices including: terraces, grass waterways and buffer strips. These practices have been very effective in controlling soil loss. At this point we are also looking into reduced tillage systems and nutrient placement / timing systems that will hopefully help our farming operation and help meet Iowa's Nutrient Strategy in the future. I believe this strategy can work better than any regulation that we put in place, if we fully fund it and give it a chance to succeed. Dustin Sage

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #408.

Timestamp 1/9/2013 7:42 PM

**Name** Maurice Johnson

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

As a land owner and farmer I've always been interested in land conservation practices. I've implemented conservation practices based on science to help maintain and improve our farms productivity.

We have used no-till soybeans for about 6 years,improved our waterways to handle rain runoff, installed grass buffers along several small creeks and around all our Karst sinkholes.Newer practices include using strip till on about 60% of our corn acres and split applying of our nitrogen based of off our crop consultants recommendations. We also incorporate all off our liquid hog waste.

New practices that we are looking at is cover crops to protect against water and wind erosion.

It's very important to fund programs and cost share programs to help farmers landowners to implement practices that might work on their farms to help protect the environment Maurice Johnson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #409.

Timestamp 1/9/2013 7:46 PM

Name Ash Kading

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

On our farms we have voluntarily built miles of grass waterways with our own funds to save soil and stop the erosive power of water. We have also used scrapers to haul eroded topsoil from low areas to thin sidehills and washouts. Every fall and spring with dry weather we spend weeks working on this soil conserving work. We plan to continue this soil conserving work in the future. We would prefer to continue to pay for it ourselves and have a lower state income tax rate.

We do not need any more regulations in this state. Landowners should be in sole control of what they do on their own land, and that means only voluntary programs and practices. Anything mandatory is not constitutional and would be an attack on private property rights. Iowa farmers and landowners are very intelligent people and are quite capable of determining themselves which practices are best suited for conserving the soil on their farms. Allow them to do that, and they will continue to make the land yield forth its bounty, creating the feedstuffs used in feeding this state, the nation and the world. Ash Kading

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #410.

Timestamp 1/9/2013 7:52 PM

**Name** James McCreary

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support the science based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices that farmers do and will continue to do. James McCreary



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #411.

Timestamp 1/9/2013 7:55 PM

**Name** James Hassebrock

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please support the Iowa Nutrient Reduction Strategy. This plan will show what Iowans can do. Iowans know that if nothing happens then more regulations are coming. One size that fits all will be costly and not work as well. James Hassebrock

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #412.

Timestamp 1/9/2013 7:56 PM

**Name** David Hommel

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Please lend your political support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. David Hommel

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #413.

Timestamp 1/9/2013 8:01 PM

**Name** Russell Kurth

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I strongly support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I make my farm management decisions based on sound science. That is the way we should implement the nutrient reduction strategy. Successfully implementing the program will take a lot of on farm research and a lot of information and education.

I urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. Russell Kurth

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #414.

Timestamp 1/9/2013 8:17 PM

**Name** Eric Monson

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. I urge you and other state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

Conservation is my number priority. I am 100% no-till with my farming practices. I utilize the government programs: CRP, CSP, etc. to protect the environment as much as I can. We want to protect our soils as that is our livelihood!

Thank you, Eric Monson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #415.

Timestamp 1/9/2013 8:26 PM

**Name** Stephen McGrew

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would like to urge you to support a science based state nutrient reduction strategy for Iowa. I feel that a voluntary approach will work better than people trying to do minimum legal requirements.

I feel that it will be necessary to help fund some of these practices like you have in the past.

On our farm, we have been implementing many conservation practices. These include, no-till, terraces, cover crops, nutrient VRT prescriptions, and auto boom shut offs. Stephen McGrew

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #416.

Timestamp 1/9/2013 8:32 PM

Name Brent Naeve

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I feel the Iowa Nutrient Reduction Strategy is good plan. Being science based is important, the reasearch has been done to show the outcomes meet the goals. I also think that being voluntary is important, we all are more likely to do more than what is asked when it is our option, rather than when required, we do the minimum only.

As a fifth generation Iowa farmer, I always work toward leaving the land I am responsible for, better then when I started. I use grass waterways, filter strips and residue management to limit soil and nutrient loss.

Please support this program with your vote and also funding. As always limited funding limits the results. Brent Naeve

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #417.

Timestamp 1/9/2013 8:56 PM

**Name** Michael Ugulini

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Please support nutrient reduction voluntary control. I as a farmer do the best possible to protect the ground I farm because it is my lively hood. If I don,t protect it it won.t be here for future generations to help feed the world. Thanks Mike Ugulini Michael Ugulini

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #418.

Timestamp 1/9/2013 8:59 PM

**Name** Larry Kinsinger

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

As the owner of farmland in Iowa, I have a desire to maintain the soils and water they are a part of this farm. I think most farm owners have the same concern as I do. The financially responsible thing to do is to maintain, to the best of our ability, the resources we are using. Therefore many farming practices are used on a voluntary basis without needing governing oversight.

I have installed terraces on my farm in order for the neighboring farm to build working terraces to protect both farms soil and water. I did not need the structures on my farm but in order for the neighboring farm to get them built, I needed to control the water through inlet structures on my side of the fence. While funding help was provided, the idea and implementation was based on our own desire to protect our assets. Larry Kinsinger



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #419.

Timestamp 1/9/2013 9:10 PM

**Name** Larry Kinsinger

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I apologize for the email on the nutrient reduction issue. The spell check did not work and I know I did not spell everything correctly. I think the email was sent without correction. Thank you for your time trying to understand what I meant to say. Larry Kinsinger

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #420.

Timestamp 1/9/2013 9:11 PM

**Name** Birgitta Meade

**City** Decorah

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Voluntary guidelines for industrial agriculture?? Get real. That's what got us in to this mess that poisoned our neighbors to the south. There need to be some teeth in these regulations because all the land stewards I once new were purged from farming by get rich quick crooks. Pleading with the polluters to be good boys has not worked so far. They don't care about fines. Polluters who steal the health of their neighbors are thieves. Thieves should be incarcerated to protect the public.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #421.

Timestamp 1/9/2013 9:12 PM

Name andy hora

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I am writing to urge you fund the Nutrient Reduction Strategy and to provide more funds for conservation cost share. We have built terraces, grassed water ways, and creek buffers. There is never enough cost share to complete the projects that we will do. We also no-till our land and have just started using cover crops. We have started the ball rolling in the right direction. We need your help to keep it going.  
Please fund these conservation programs. andy hora

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**422**.

**Timestamp** 1/9/2013 9:23 PM

**Name** Timothy Dillon

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

As a young Iowa farm family, I would like to take this opportunity to encourage you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs.

I believe that a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices is the best way to protect Iowa's environment and the next generation of Iowa's strong agriculture. Timothy Dillon

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #423.

Timestamp 1/9/2013 9:38 PM

**Name** Tim Runyon

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

We in southern Iowa do not have a lot of top soil to spare. I have put in lots of tile and terraces voluntarily. They help my land, increase value, increase profits and keep the soil in place. Most people will try to help themselves especially if the government puts in some funding to ease the financial burden. But these laws must be science-based and have some merit. Tim Runyon

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #424.

Timestamp 1/9/2013 9:45 PM

Name Tom Head

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

As many as you to take a position on reducing run off and nutrient management within the state. As with many requests of your actions, I encourage you to respond using science based logic and not the emotionally charged logic that some might suggest. Farmers and consultants know that is in their best interest to care for the land and act as good stewards. IDALs along with Iowa Farmers are best suited to identify practices, and watersheds to protect the waters of the state. To encourage these right actions, studies, and demonstrations requires funds for cost share and educational programs. Please keep this in mind as budget decisions are being made. tom

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #425.

Timestamp 1/9/2013 9:48 PM

**Name** Todd Blum

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing this email in support of the Iowa Nutrient Reduction Strategy, a science based plan that employs voluntary conservation practices with the need to maintain agricultural production.

I strongly urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

Conservation is a constant process. Farmers know if we take care of the land, the land will take care of us. Personally we use conservation practices such as no-till, buffer strips, headlands, waterways, terraces, crp, crop rotation, and planting on the contour. Todd Blum

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #426.

Timestamp 1/9/2013 10:01 PM

**Name** Paul McClain

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

i believ this is an excellent program and needs to be pushed on to further oints due to all the chemicals that farmers are using now days in making better crops. Therefore we need to keeps those chemicals out of our livestocks watering systems as well as our own water. Paul McClain



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #427.

Timestamp 1/9/2013 10:54 PM

**Name** Randy Heitz

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Today, I am writing to let you know that Iowa NEEDS a voluntary system to further enhance our states conservation resources.

Volunteerism works. It's been a standard means of accomplishing things in our state. School boards, fire departments, etc. I have volunteered to promote conservation practices on our land by installing a farm pond to catch run off water and also incorporates a dry hydrant for fire protection in rural Floyd County midway between Charles City and Rockford. I cooperated with Trees Forever, in putting land in a buffer strips around the pond. In addition, I planted over 3000 trees on both CRP and non-CRP ground to further restrict soil movement.

We don't need regulations. We need a voluntary system that is fully funded and scientifically based. Randy Heitz

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #428.

Timestamp 1/10/2013 4:31 AM

**Name** Larry Boeck

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

We need the support of voluntary conservation. Larry Boeck

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #429.

Timestamp 1/10/2013 5:11 AM

Name Brandon Beenken

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

There has been a lot of discussion on the Iowa Nutrient Reduction Strategy and as an Iowa farmer I am concerned. I feel that to have a program like this be successful it will need to be adequately funded. I know that with all the budget talks and cuts that putting more money into programs can be a challenge but here is one place that counts.

The strategy that lawmakers take needs to be science based with high importance placed on voluntary conservation practices. Maintaining agricultural production also needs to be considered for this program and its effects on other Iowa affairs.

Being an Iowa farmer I take pride in the conservation practices used on our farm to protect the soil for the today and the future.

Thank you for your consideration. Brandon Beenken

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #430.

Timestamp 1/10/2013 6:18 AM

Name David Irwin

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing today to encourage you to support science based state nutrient reduction. We also need to use this information to promote voluntary conservation practices that are based on this information. We do not need to further burden our economic strength by passing more laws based on emotion that only encourages more regulators hired and no results. Please put funding in place for cost-share programs to promote voluntary practices.

We as farmers are for the most part are stewards of the land. For example, I participate in the CSP program. With cost share, I have been no till farming for several years. I have buffer strips and have installed waterways. We install terraces and tile to slow water flow and keep the soil in place. Keeping soil in place keep nutrients in place.

Farmers are more than willing to participate in nutrient management. Research to reduce nutrient application without reducing yields will increase profit margins, and reduce water contamination. Providing information and cost share to help farmers implement these conservation programs will prove to have successful results. David Irwin

**Name** Keith Dexter**City****State****Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

Secretary of Agriculture Northey,

I sincerely believe that using science to target the best approaches in the most practical areas makes the most sense when compared to one size fits all regulation from the federal government.

Nutrient Reduction strategies, implemented locally and voluntarily on the most vulnerable land and watersheds have been proven to work in the past in different areas across the state. Coordinating efforts statewide, while measuring progress and reporting to the public seems like the most reasonable way forward.

I believe that Iowa farmers, when presented a practical plan that makes scientific sense while still allowing for viable agricultural production will voluntarily choose the right path 95% of the time. That is why I urge you to fund Secretary Northey's request to implement this strategy statewide.

To emphasize, I believe the key to voluntary implementation is statewide local coordination. If someone local comes to me because I am in x watershed in x soil type using x farming method and explains that using y farming method will drastically reduce nutrient entry into our streams and the Gulf of Mexico, I am likely to implement a plan, working with this local expert. I am likely going to keep my food production levels high as well.

If a federal agent from the EPA comes to my farm and forces me to implement some plan that was developed in Washington DC by an expert who grew up in a different state and doesn't understand modern production practices, it is likely that food output from my farm will fall, along with the value of my land. It is also very questionable that the practice mandated by an un-accountable federal agency will reduce nutrients either. Keeping the power to reduce nutrients with the individual and the local expert will have better results every time.

On my farm, the most important practice I have implemented has been using a finishing disk that would be considered a secondary tillage tool in place of more aggressive tillage practices in the fall on highly erodible land. This practice levels stalks while sizing residue and shows a little bit of black soil on the surface allowing for much faster warm-up in the spring. The key is to not tear out the root-balls of the previous year's crop. This does an excellent job of keeping soil in place. Many years, no tillage pass is needed in the spring, even when growing second year corn.

I have also been spreading dry phosphorus and potassium with variable rate technology for many years. Within the next five years, I plan on implementing technology that allows for variable nitrogen application during side-dressing. This puts more nitrogen where it is needed, closer to the point of crop utilization, while allowing me to save money by reducing application rates where the marginal cost exceeds my marginal return.

The key to making this strategy work is to keep the strategy voluntary, allowing for local innovation, while utilizing the state of Iowa's ability to coordinate and educate. Keith Dexter

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #432.

Timestamp 1/10/2013 6:45 AM

**Name** Aaron Fopma

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am a farmer in north central Iowa. I enjoy recreational use of water around me and am very interested in maintaining high water quality.

I support a strategy for nutrient reduction that is based on science and I support voluntary conservation practices that will benefit the environment and not reduce agricultural production.

I am asking you to fund the Iowa Nutrient Reduction Strategy. Aaron Fopma

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #433.

Timestamp 1/10/2013 7:13 AM

**Name** Douglas Caffrey

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

We need to keep the voluntary conservation practices for the need to maintain agricultural production. When these practices are law people always look for ways not to conform. I urge state lawmakers to fund the Iowa Nutrient Deduction Strategy and all other conservation cost-share programs. Douglas Caffrey

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #434.

Timestamp 1/10/2013 7:13 AM

**Name** Steve Hofmann

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

As a farmer and conservation contractor, I ask that you fund the conservation cost-share programs as well as the Strategy for Iowa Nutrient Reduction so any decisions can be made based on true scientific facts as opposed to emotional impulses. On all of my acres run-off is controlled by both terraces and tillage practices. Terraces are so costly, that without cost share, many that are needed would not be constructed. Most farmers want to know they are doing all they can to be good stewards of the soil and nutrients. Sound science and cost-share will help to ensure that. Steve Hofmann



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #435.

Timestamp 1/10/2013 7:28 AM

**Name** James Flinspach

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Please support and fund the Iowa Nutrient Reduction Strategy. There is a great need for a science-based state nutrient reduction strategy. This strategy recognizes the importance of voluntary conservation practices.

We have built several structures on our farms and would fund more of them if there was more cost-share money for these projects. I believe the carrot and the stick are much better incentives for these projects than the stick alone. James Flinspach

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #436.

Timestamp 1/10/2013 7:39 AM

**Name** Betty Anderson

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Iowa farmers need a science-based state nutrient reduction strategy. We want voluntary conservation practices

We don't need more regulations. We need more funding. Betty Anderson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #437.

Timestamp 1/10/2013 8:37 AM

**Name** Linda Herman

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please fund the science-based state nutrient reduction strategy that is based on voluntary conservation practices & need to maintain ag production. This program will put Iowa ahead of the curve, instead of bowing to EPA. Sec. Northey's work to provide a proactive plan is a good one.

We also need funding for the state's other conservation cost-share programs. As one of the Harrison County Soil and Water Conservation District's Commissioners I know we always have more people wanting to do conservation work than we have cost share dollars to help make it happen. Linda Herman

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #438.

Timestamp 1/10/2013 8:48 AM

**Name** Jason Dahl

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

As a 35+ year farmer, I urge you to support the Iowa Nutrient Reduction Strategy that has been developed by IDALS, the DNR and ISU.

This is a science based strategy for nutrient reduction and not a one size fits all plan that involves more unnecessary regulations such as have been forced on farmers on the east coast.

I also urge you to adequately fund this science based Iowa Nutrient Reduction Strategy.

We are already over-regulated with plans that have nothing based on good science. Jason Dahl

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #439.

Timestamp 1/10/2013 9:07 AM

Name Robert Ritscher

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

i am on the soil conservation board and very aware of working to save soil and nutrients soil [land] and nutrients are expensive the problem with is one size does not fit all the weather,soils,conditions are all variable mandates are rigid education plus voluntary works best no till is increasing does not work every where every year cover crops are starting to be used more in places they are very effective soil conservation has more poeple applying for costshare conservation practices than there are funds available Robert Ritscher

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #440.

Timestamp 1/10/2013 9:11 AM

Name Robert Casterton

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

I support the nutrient reduction strategy recently announced by Governor Branstad. Two key points are that solutions are based on scientific study and adopting solutions is voluntary. First, research and study with a science base will help develop solutions that work and last. Second, voluntary efforts with some incentives gives landowners a stake in the solution, and in my opinion, has a greater chance at being successful. On my farm, we have added waterways and filter strips over the last 15 years. Both have helped to significantly reduce erosion and runoff. We are also minimizing tillage, and have gone to applying nearly all of our nitrogen after the crop emerges, reducing loss and runoff from fall and early spring applications.

This initiative will require funding to implement, and I ask that you provide this funding. Robert Casterton

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #441.

Timestamp 1/10/2013 9:18 AM

Name Shelly Toppin

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Express your support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

Urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

Share voluntary conservation practices you've already implemented and those you hope to implement in the future to benefit your farm and the surrounding environment. Shelly Toppin

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #442.

Timestamp 1/10/2013 9:25 AM

**Name** Nicholas Podhajsky

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

It seems Iowa agriculture is constantly under attack from regulators regarding environmental issues. The science quickly becomes politicized, and the true nature of the discussion is lost.

The Nutrient Reduction Strategy is a science based approach to proactively address practices that Iowa farmers use in production agriculture, and evaluate the environmental impacts that result from those practices. It allows for voluntary participation, however, successful farmers are those that are good stewards of their resources and only spend money on usable fertilizer and productive tillage trips. The days of over fertilization and recreational tillage have passed.

I ask you to support the funding of the conservation budget, and in particular the Nutrient Reduction Strategy. Nicholas Podhajsky



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #443.

Timestamp 1/10/2013 9:30 AM

**Name** Steven Riesselman

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

In order to maintain the agricultural production in the state of Iowa, it is important to have voluntary conservation practices.

Adequate funding for the Iowa Nutrient Reduction Strategy, and the state's other conservation cost-share programs, will help to reach this goal.

I have farmed for over 40 years, using smart conservation practices such as; headlands, buffer strips, no till planting and CRP along waterways. I plan to continue these things, and I am willing to listen to any other suggestions to preserve our land for future farming generations. Steven Riesselman

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #444.

Timestamp 1/10/2013 9:33 AM

**Name** Skott Gent

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I just wanted to again voice my support for the use of science-based information when constructing Iowa's nutrient reduction strategy. I also urge you to make sure to fund this and other conservation cost-share programs.

Cost-share programs have helped me immensely in constructing numerous conservation practices on my farm, and if properly funded will continue to incentivise farmers to voluntarily do more to help clean up the State's waters. Skott Gent

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #445.

Timestamp 1/10/2013 9:41 AM

**Name** Richard Gansemer

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please support and fund the iowa nutrient reduction stragedy,as well as the states other conversation cost-share programs.Most of us farmers in the area already use mininum till,grassy waterways, and border strips along streams.We are already taking care of the soil.Thank you.  
Richard Gansemer

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #446.

Timestamp 1/10/2013 9:44 AM

**Name** Dena Morgan

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I would like to express my support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge you to adequately fund the Iowa Nutrient Reduction Strategy as well as the state's other conservation cost-share programs. In the past, failure to adequately fund these programs has delayed needed conservation projects.

On our own farm in the past three years, we have built more terraces, repaired terraces that were failing and seeded waterways. We have rebuilt ponds and repaired washouts in pastures, being mindful to reseed any areas where dirt work has been completed. We understand the importance of preserving the land and implementing these vital conservation practices.

I thank you for your consideration on this matter. Dena Morgan

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #447.

Timestamp 1/10/2013 10:14

**Name** Ron Kilburg

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I believe a science-based NRS should voluntary and be publicly promoted to agriculture to get buy in. The nutrient reduction strategy should have a cost benefit analysis done to it and the cost positive benefits should be publised . Those practices should be funded by conservation program dollars help with vouintary implimentation.

Farmers I know continue to impliment conservation

practices to into fit their spicific farming operation. We've implemented no-till,contuoring,crop-rotations,cover-crops ,settling basins ,filterstrips grid-sampled nutreint analysis recs. and will continue to implement new practices that fit our operation.

I believe we can obtain goals vountarilly, both state and national. Ron Kilburg

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #448.

Timestamp 1/10/2013 10:20

**Name** Gene Sievers

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing this letter to encourage you to support and fund the Iowa Nutrient Reduction Strategy, and other conservation cost-sharing programs. I feel that science based nutrient reduction should be voluntary through conservation practices that farmers use.

I already use conservation practices such as; reduced tillage, reduced chemical use, spring applied fertilizer, and other practices to reduce runoff. Many of my neighbors have change their ways also.

Please support the Nutrient Reduction Strategy. Thank you. Gene Sievers

**Name** Seth Wengert**City****State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

1- Why is Agriculture the only addressed source of non-point source pollution addressed in the report? By ISU's own admission there are other non-point sources that have not been addressed in the report. ISU cited erosion of stream banks containing legacy phosphorus buildup as one other major source. It appears that agriculture is being singled out. How can any significant reductions be achieved if ALL sources are not addressed and the burden of reduction be unfairly laid on just a few sources.

2- With regards to the valuation of land that is to be taken out of production for buffer strips and wetland, it is being under evaluated by the report and is lowering the cost of implementation. The report used ISU average cash rental rates as the cost to take land out of production. However farmers and landlord will tell you that the ISU rental rates are low and do not reflect the going current rate for farmland rental. Plus on top of this low rental rate being used, the report failed to account for the lost profit potential on those acres taken out of production.

3- The report suggest that part of nitrate run off reductions could be achieved using the Iowa State University Extension Nitrogen rate calculator to determine the Maximum Return to Nitrogen(MRTN). It is unrealistic to expect farmers to reduce the nitrogen application rates to what amount to a rate for an average yield. After all average yields are set by the extremes, both high and low. Farmers have to apply fertilizer for the maximum crop yield possible in order to feed the world and be competitive in the market place.

4- The report appears to partially ignore point source pollution. Why does it affect only the 130 largest point source polluters? If we use this same logic for non point-source polluters then should this report only affect the 130 largest farmers in the state? Yet it seems that this report is intended to be a guide for every farmer in the state. Point source and non-point source polluter are not being held to the same standards. It is much easier for the point source polluters like municipalities to implement changes because they can bill their customers directly for the new costs incurred. Farmers cannot do that!

5- Regardless of which set of management practice changes would be adopted from the report to be used to reduce non-point phosphorus and nitrogen run off to the desired goals, the cost is staggering. There is no way that farmers can be expected to use any of the suggestions from this report if they are ultimately expected to bear the costs themselves. In a more average farm economy that has substantially lower and more normal profit margins, the costs of these new practices could actually be the difference between a loss or profit on a lot of operations with a rented land base. If the public feels that non-point phosphorus and nitrogen run off is a concern then they will have to be willing to pay increased food costs at the grocery store.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #450.

Timestamp 1/10/2013 11:08

**Name** Barbara Prose

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**  **Nonpoint Source**  
 **Policy**  **Point Source**

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Secretary of Agriculture Northey,

You have a wonderful opportunity to help improve and maintain Iowa's water quality by adequately funding the Iowa Nutrient Reduction Strategy. By supporting this and other conservation cost-share programs you will be supporting a science-based state nutrient reduction strategy not ones that are emotionally based causing hardships on the people who own and have worked the land.

Farmers know their land and have some rather ingenious ideas - ideas not often thought of by someone sitting in an office. It is very important to have voluntary conservation practices that enlists the help of the farmer landowners.

Iowa needs to improve water quality plus maintain our agricultural production which brings millions in state revenues. I believe funding the Iowa Nutrient Reduction Strategy and cost-sharing programs are an economical way of doing both. Barbara Prose



**Name** Jerry Shepler**City****State****Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

I live on,own and operate a small 210A farm in NW Warren County. North River and 2 substancial creeks run through this farm that has been in my family since 1946.

Permanent pasture, cattle, buffer strips, ponds, contouring, reduced tillage and terraces have been part of the practices carried out through the decades of our ownership. Some practices (terraces) were helped by cost sharing and some because they were the right thing to do. We learned this through educational activities. The first conservation practice I can remember being advocated by ISU and conservation groups was contouring and strip crop farming. These practices were adopted voluntarily because educational efforts showed the benefits.

I urge water quality protection efforts continue to be voluntary, using education and cost sharing on qualified, approved projects.

Jerry Shepler

Norwalk, IA Jerry Shepler

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #452.

Timestamp 1/10/2013 11:38

Name Matt Siefker

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

It is very important for the future of Iowa that we take a science based approach to for our Nutrient Reduction Strategy. I support IDALS and the DNR conservation plan. Every farm operation is utilizes different management practices that best suite their operation and soil types. Individual farmers have far better knowledge of their land than someone sitting behind a desk in Washington! Some of the things that I do include filter strips along all waterways, IPM pest management, spring applied Nitrogen and incorporation of fall applied P & K. IOWA can do a much better job than the EPA! Matt Siefker

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #453.

Timestamp 1/10/2013 11:46

Name Al Schafbuch

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I farm in north west Benton Co. by Dysart. I started to use NO TILL in 1992 on land that is not highly erodible. I also use variable rate fertilizer and lime application.

I support a voluntary science biased state nutrient strategy that has cost share payment to get farmers started using the conservation practices needed to keep the fertilizer and soil on all farmer farms.

No till works great for keeping phosphors on my farm as it moves with the soil and I have very little soil moving. I have also stabilized the creek banks on my farms by sloping back the soil and getting grass to grow or by using old broken cement to stop erosion of stream banks.

There need to be some credit for the conservation practices that have been used for the last 10 years, as the water is getting cleaner each year. Al Schafbuch

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #454.

Timestamp 1/10/2013 11:47

**Name** Vincent Leners

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am asking that you support a voluntary, science and technology based approach to improving waster quality. Thank you Vincent Leners

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #455.

Timestamp 1/10/2013 12:49

**Name** Russell Miller

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Iowa farmers do a fantastic job of implementing conservation into their farming operations. I support a science-based state nutrient reduction strategy that will incorporate the use of voluntary conservation practices. I want to leave my farm in better shape than when I started farming.

Please make sure the Iowa Nutrient Reduction Strategy and all other conservation cost-share programs are adequately funded. These programs help us keep our land in top shape allowing us to lead the nation in production. In past years funding for conservation programs may have run short delaying some conservation projects.

We have put in miles of terraces on our farms using cost-share programs. These conservation practices have helped control erosion tremendously and we couldn't have done it without cost-share programs. We all need to work together to protect our land. Russell Miller

**Name** Matthew Bormann**City****State****Providing comment on the following sections:****Executive Summary****Nonpoint Source****Policy****Point Source**

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Secretary of Agriculture Northey,

I think the voluntary plan will work. On our farm we are in year 2 of strip till for about half of our acres. The other half gets manure with conservation tillage. With new technologies such as, auto steer, GPS, and encapsulated urea nitrogen we have been able to cut back our nutrients and place them about 8" deep. At 8" that is right in place for the roots better utilize the nutrients. With a good tractor and auto steer you can plant right over these strips.

Also we have been installing more grassed waterways to filter surface runoff. There are many fields in this state that could use more water ways.

I feel where I live in Kossuth County if everybody would do a timelier job with placement of nutrients and have a better plan of what to put on in regards to crop yields and soil tests it would help.

Getting things black with tillage has been a recent fad in our area. Cutting back on tillage and better utilizing residue managing equipment with the planter would hold soil in place and cut the amount of down stream sediment and pollution during rainfall. Heavy tillage is big, especially with the amount of money people have made in recent years. More tillage does not equal better yields. Better management helps the environment and increases profits.

Sincerely,

Matthew Bormann Matthew Bormann

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #457.

Timestamp 1/10/2013 2:02 PM

**Name** Dona Mae Matthiesen

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please fund the Iowa Nutrient Reduction Strategy along with the state's other conservation cost-share programs. We support voluntary conservation. Dona Mae Matthiesen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #458.

Timestamp 1/10/2013 2:08 PM

**Name** Jerald Crew

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

It's extremely important we support Iowa's voluntary plan to reduce nutrients leaving Iowa. We know best-not some bureaucrat from EPA!  
Jerald Crew



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #459.

Timestamp 1/10/2013 2:12 PM

**Name** Mark Bohner

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

This program is the 1st comprehensive study worked on by all people involved with water quality. Farmers will do the right thing, provided there is cost share money available. This program will also offer alternatives for different farming situations. One size does not fit all! Please fund this great program. Mark Bohner

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #460.

Timestamp 1/10/2013 2:24 PM

Name Jay Matthews

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

I would like to strongly support this science based voluntary approach for conservation practices. I believe this will encourage farmers to use more conservation practices by rewarding them for adopting the strategies that work on their farm and not being forced into doing things that may be a fit for some but won't work well for others. When this happens the full usefulness of the practice is never realized because the farmer sees it as a job to deal with, not something that is helping him on his operation. I hope that this initiative will be adequately funded when it is put in place. A lack of funding will spell doom for this initiative and, most likely, end up with the EPA telling us what we need to do and how much the state is going to spend to do it. I don't believe either of those will be good for our great state. I don't think it is a hard to argue that the Nutrient Reduction Strategy is a much better idea for our state than the EPA mandating things to us.

I know most of the farmers that I work with have embraced variable rate technology for their fertilizer applications to allow them to get the most from the fertilizer they apply by only applying the amount needed in different areas of the field. There are more and more each year that are also adding a nitrification inhibitor to their nitrogen applications. Not only is it good for the environment but it also protects the farmers investment in their fertilizer dollars.

Again I hope that this initiative gets implemented and gets the funding that it deserves to allow Iowa to continue to be a leader in feeding and fueling the world and continue to be a leader in protecting the great natural resources we are all lucky to have. Jay Matthews

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #461.

Timestamp 1/10/2013 2:25 PM

**Name** Dan Carpenter

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

The Iowa Nutrient Reduction Strategy is a good common sense program to voluntary conservation practices on Iowa's varying landscapes and soil types. The strategy considers point source and nonpoint source approach to addressing water quality and reduction of nutrients in the water.

Your support of the Iowa Nutrient Reduction Strategy is important to Iowa agriculture. Dan Carpenter

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #462.

Timestamp 1/10/2013 2:31 PM

**Name** Jerry Crew

**City** Webb

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I strongly support Iowa's voluntary strategy for nutrient reduction. Keep EPA away!

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #463.

Timestamp 1/10/2013 2:47 PM

**Name** Neal Keppy

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Please support a voluntary and science based approach for conservation practices. We as farmers don't need a top down system of regulators determining what is best in terms of conservation. Most farmers understand that it benefits everybody to have sustainable agriculture and a productive ecosystem in balance. We have miles and miles of grassed waterways and field borders to help keep soil and nutrients in place. We also use minimum tillage to keep soil stable. thank you for your time and effort on this project. Neal Keppy

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #464.

Timestamp 1/10/2013 3:17 PM

**Name** Bryan Mowrer

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I don't believe farmers are against regulations, I believe they are against regulations that aren't science based. We don't want to be misled on practices that don't work. I think there are farmers that would try some new things on their farms but are afraid of some of the costs involved. I know of farmers who have stopped at the local NRCS office and asked about funding that were put on a very long list. Why not use some of that state surplus to get that list caught up a little bit? I've been pleased with the waterways that have been installed on my farm. They look great but most of all they really do reduce erosion. I also believe those same waterways I've installed aren't the answer for those with flatter land. Each farm should have their own plan to reduce nutrients from getting into our streams. Bryan Mowrer

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #465.

Timestamp 1/10/2013 4:51 PM

**Name** Al Schafbuch

**City** Dysart

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I support a voluntary science biased state nutrient strategy that has cost share payment to get farmers started using the conservation practices needed to keep the fertilizer and soil on all farmers farms.

I farm in north west Benton Co. by Dysart. started to use NO TILL in 1992 on land that is not highly erodible. I also use variable rate fertilizer and lime application.

No till works great for keeping phosphors on my farm as it moves with the soil and I have very little soil moving. I have also stabilized the creek banks on my farms by sloping back the soil and getting grass to grow or by using old broken cement to stop erosion of stream banks.

There need to be some credit for the conservation practices that have been used for the last 10 years, as the water is getting cleaner each year.

Thank You

Al Schafbuch

509 Sherman St.

Dysart, IA. 52224

319-476-3727

schafbuch69@gmail.com

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #466.

Timestamp 1/10/2013 4:58 PM

**Name** Luke Schuldt

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I believe this program will work to help keep our waters clean. We as farmers in general already do what we can to keep our soils in place and out of rivers and streams. We will continue to implement new science based practices when applicable. Luke Schuldt



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #467.

Timestamp 1/10/2013 5:08 PM

Name Kipp Fehr

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing to garner your support to fund the Nutrient Reduction Strategy that is being proposed in our state. I feel that voluntary action on differant conservation efforts is a much better route than a one size fits all regulation. On my own farm, have reduced tillage on corn stalks and have ended tillage on soybean stubble. I also do not apply any nutrients on my farms that are in the Des Moines river flood plane in the fall. I have also cut back the amount of nitrogen applied and split apply what I do use. I encourage you to help Iowa farmers do their share to reduce the dead zone in the Gulf of Mexico. Also on the same line, farmers are not to blame for 100% of pollution going down our rivers. Soil eroision on creek and river banks is huge as well as city contribution to this problem. Kipp Fehr

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #468.

Timestamp 1/10/2013 5:11 PM

**Name** Ronald Miller

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I support the science based state nutrient reduction strategy that is voluntary because I want to protect my own property and others for my own personal benefits. No further force is needed because it would take money out of my pocket and big government only screws things up. I would like to urge my legislators and officials to fund the state nutrient reduction strategy along with other cost-share conservation programs so that we can stay on top of these issues without needing any further interference from big government. In fact, I have already lowered my nitrogen applications while implementing some organic crops into my operation to further reduce any possible environmental contamination. Please do whats right. Support the voluntary state nutrient reduction strategy and fund the conservation cost-share programs. Ronald Miller

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #469.

Timestamp 1/10/2013 5:12 PM

**Name** Alan McGaffin

**City** Sioux City

**State** Iowa

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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As a resident of Sioux City for nearly thirty years with relatives along the Mississippi River I have crossed the state on as many east-west roads as I can find. In the past several years I have witnessed the removal of many acres of shelterbelts and grass filter strips along creeks and rivers, all for the push of the almighty dollar. Whether the land is hilly and erosion prone or level to gently rolling, the relentless pressure to expand acres and feed the world goes on.

We hear that lost habitat has resulted in the reduction in game bird and other species of bird and animal but don't so easily see or care about the lost soil and the additions of nutrient poisons down stream and to the Gulf of Mexico. Ralph Rosenberg of the Iowa Environmental Council cites a 2011 survey from Iowa State University which found that 72% of Iowa's farmers had spent less than \$5000 on conservation efforts on their farm in the previous ten years. And the Iowa DNR really expects voluntary efforts will achieve its reduction goals?

Voluntary compliance from Iowa's farmers and ranchers will never work. It is insulting and incredible that the Iowa DNR would require cities but not rural lands to abide by the law. Require mandatory compliance of both or end all government subsidies and tax base sharing. Mandatory compliance will require inspections, aerial or otherwise. Own up to your responsibilities as the regulatory steward that our future generations need.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #470.

Timestamp 1/10/2013 5:15 PM

**Name** Rex Rhoten

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support science-based state nutrient reduction strategy. It acknowledges the importance of voluntary conservation practices.

Also, I urge you to adequately fund this strategy as well as other cost-share programs. Rex Rhoten

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #471.

Timestamp 1/10/2013 5:26 PM

**Name** Brad Black

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I strongly support a science-based state Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Please adequately fund these programs to avoid delaying much needed conservation projects. Brad Black

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #472.

Timestamp 1/10/2013 5:37 PM

Name Brad Fetters

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I urge you to support the nutrient strategy if it is based on science and it must include urban areas as well, farmers can't be held at fault when the urban centers have no restrictions on what they can put on yards to keep them lush. All actions must be kept on a voluntary basis or I believe there would be great resistance and cooperation.

So again I urge you to support and adequately fund conservation cost share programs to put Iowa on the front of the line in conservation practices.

I personally have used some of the practices to use on my farm with paddock fencing and structures to stop runoff.

Your support is greatly appreciated Brad Fetters

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #473.

Timestamp 1/10/2013 5:41 PM

**Name** Carl DeJong

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I would like to urge you to support a scienc based nurient reduction strategy for iowa I think it should be a voluntary program as that always works better than and is easier to implement than a mandatory program. you need to fully fund the nutrient reduction stragedy .it is also important to fund the conservation cost share programs Carl DeJong

**Name** Jeffrey Pape**City****State****Providing comment on the following sections:****Executive Summary****Nonpoint Source****Policy****Point Source**

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Secretary of Agriculture Northey,

I have been the Chair person for the Hewitt Creek Watershed Project for 7 years. We have done exactly what this project is talking about, our extremely diverse terrain, soil types, and types of livestock operations is a perfect test for this type of program. We have shown that you can get volunteers by giving them the correct amount of education towards the differences in their practices, and allowing them to make the right choices. We are stewards of the land and most of the farmers will always make the right choice to better their land.

You will never get all of the people in a voluntary type program, however you will get the ones that can make the biggest difference for you. The ones you don't get, likely are not following the rules already. This has been our experience, but we have approx. 75% of the farmers in our 23,000 acre watershed participating. Take note, this is with only small incentive payments to get them involved. Again once you educate them on how they can improve they make the right decision on their own. It is the nature of most farmers to want to do a better job always, and this includes Nutrient management. A one size fits all does not work, we have proved that even in our small watershed we need different issues addressed from one area to another. This type of program allows that flexibility.

I hope and pray you will support this voluntary method of conservation. This is how you WILL get the most bang for your money. We have shown we can install waterways, headlands, etc. cheaper and with less pushback from landowners. Nobody likes to be told what they have to do on their property, but give them the idea and an incentive and watch the projects grow!

We are completely no-till on our farm, we have a grade stabilization structure, headlands, water ways, Riparian buffer along a creek, and we do cover crops and love showing people how well all these practices work. We can prove the improvements benefits to anyone. So yes I believe in this system because I know it works, and believe others have seen the same based on Hewitt's success. Jeffrey Pape



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #475.

Timestamp 1/10/2013 5:43 PM

**Name** Michael Becker

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

We need a state nutrient reduction strategy, That knows how important voluntary conservation practices are!  
Lawmakers need to fund the Iowa Nutrient Reduction Strategy as well as other conservation programs.!

We started to apply anhydrous ammonia in the spring time and put in buffer strips in. Michael Becker

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #476.

Timestamp 1/10/2013 6:01 PM

**Name** Jon Zirkelbach

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would like to ask for your support for the Iowa Nutrient Reduction Strategy and allow farmers to voluntarily participate in conservation practices. I currently use reduced tillage, contour planting, maintain grass waterways, CRP buffer strips, and no-till planting which reduces runoff into our local water sources. With your support farmers would be allowed to make best practice decisions based on the needs of each individual farm. Someone sitting behind a desk and not working on the farm is the person who usually doesn't always see the best solution when it comes to the practices needed to maintain a high standard of farming while producing a high quality product at the same time. Jon Zirkelbach

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #477.

Timestamp 1/10/2013 6:15 PM

**Name** John Moritz

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Hype, over reaction, blowing out of proportion. Let us use science based knowledge and common sense to allow Iowa farmers to apply the practices that will help us reduce the loss of topsoil and nutrients.

We know what we need, but cost share to slow the loss of soil benefits all stake holders. We need you to fund those programs that benefit us all. John Moritz

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #478.

Timestamp 1/10/2013 6:21 PM

**Name** Kevin Krumwiede

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I think that proactive approach to science-based nutrient reduction is the best approach. When it is based on science, end results are hard to dispute. Keep in mind that it is easier to ask a farmer to do the right thing instead of telling the same farmer to do it your way.

One problem that has happened in the past was asking a farmer to participate in a program with the help of financial support then tell that same farmer, after he did his part, that the funds are not available.

Keep in mind that the majority of farmers want to do the right thing. I, for instance, have buffer strips along every drainage ditch I farm beside. I also take the time to split the application of nitrogen. Instead of one application, I make three. Kevin Krumwiede

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #479.

Timestamp 1/10/2013 6:33 PM

**Name** Dean Schoning

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

We are asking you to continue to support voluntary water plans. We also ask you to avoid making new regulations. Dean Schoning

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #480.

Timestamp 1/10/2013 6:45 PM

**Name** Michael Johnson

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am writing you express my support for voluntary conservation practices through the Iowa Nutrient Reduction Strategy. I believe that the land owners in Iowa are the people who are best able to understand what conservation practices work for their specific circumstances and soils. I believe that it is important that we follow through and continue to fund and support these practices and policies. Michael Johnson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #481.

Timestamp 1/10/2013 7:26 PM

**Name** Eric Sage

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Iowa farmers for some time now have worked to ensure that the nutrients they apply are fully used by their crops. It's a matter of economics. These nutrients cost too much to waste. Science-based reduction strategies and voluntary compliance are necessary components to the entire reduction process. Improving water quality is important to everyone. For this reason it is critical that we adequately fund the nutrient reduction strategy as well as other cost sharing programs for conservation. Farming is what makes Iowa's economy one of the strongest in the nation. Common sense solutions not draconian rule making will do the most to improve our water resources. Farmers stand ready to do their part.  
Eric Sage

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #482.

Timestamp 1/10/2013 7:39 PM

**Name** Shane Smith

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

We are asking you to support the Iowa nutrient strategy. I ask that you fully fund this. I already do conservation practices on my farms and will continue. Shane Smith



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #483.

Timestamp 1/10/2013 7:39 PM

**Name** Joe Golinghorst

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support this science-based nutrient reduction strategy plan and would strongly urge you to support it with me. This plan is proactive instead of reactive, but we need your help to adequately fund this nutrient plan. Joe Golinghorst

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #484.

Timestamp 1/10/2013 8:52 PM

**Name** Nicholas Burley

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I am writing to support a science-based nutrient reduction strategy. I also believe we should start with a voluntary program that uses cost-share arrangements with state and federal agencies

If you drive around Calhoun County you will now see grass buffers surrounding most drainage ditches and streams where ten years ago we farmed right up to the edge. This is a great example of farmers and conservation agencies working together voluntarily. Nicholas Burley

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #485.

Timestamp 1/10/2013 8:58 PM

**Name** David Kamm

**City** Decorah

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Iowa' failure to ensure clean water is a disgrace. As Paul Johnson recently told me, "We've known for 25 years what the problem is." While we may have made some progress during that time in point source pollution, our elected officials and state commissioners lack the political will to tackle nonpoint source (i.e. agricultural) pollution. Instead, we continue to compromise water quality, and by extension, public health for fear of inconveniencing those who think only of profit. Voluntary compliance for polluters has never worked, and thinking it will now be the most effective way to deal with nonpoint source polluters is not a "strategy," but a pipe dream. And that pipe is spewing nutrients directly into our water. The new plan is disappointing at best, and a sham a worst, since much of it fails to force polluters to take measures that would actually address the source of the problem. The fact that the EPA had to sue the state to do anything at all is absolutely embarrassing. In too many ways, our response appears to be the minimum required to avoid litigation. Shame on the state of Iowa for failing to be good stewards of our most valuable resource.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #486.

Timestamp 1/10/2013 9:12 PM

**Name** Kary Becker

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I realize the importance of soil conservation of our soil for future generations. I support a science-based nutrient reduction strategy and voluntary conservation practices.

I ask you to fund the Iowa Nutrient Reduction Strategy and also other conservation programs.

We have terraces, waterways, contour farming, no-till and grass strips along our creeks as some of the conservation measures on our farm.  
Kary Becker

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #487.

Timestamp 1/10/2013 9:19 PM

Name Ben Albright

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am encouraged that Iowa has chosen to address Iowa's water quality issues by creating a Nutrient Reduction Strategy. Water quality should be important to all Iowans.

As a farmer I do my best to manage my land and livestock to protect our water. We use buffer strips, waterways, notill, and just started experimenting with cover crops. Our feedlots all comply with DNR and EPA rules and regulations.

In the future I plan to do more notill and reduced tillage acres and continue to work with cover crops.

I believe the best way to achieve the state's goals are with voluntary programs. Regulations and rules create more problems and only encourage people to do the minimum required. The less the EPA is involved the better. The farmers know their land exponentially better than some EPA employee.

I also believe that any rules that are passed should be science based and site specific. A one size fits all approach will never work. There is too much variation across our state.

I do my best to protect my land and water. I want to leave it in better shape than when I started farming so future generations can enjoy it too.

To help myself and other farmers continue to protect Iowa's water and improve upon what we are already doing, I ask that you choose to fund Iowa's Nutrient Reduction Strategy and continue to fund current conservation and cost share programs such as EQIP.

Thank you for your diligent work on this important issue. Ben Albright

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #488.

Timestamp 1/10/2013 9:27 PM

Name Valerie Plagge

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please support the Iowa Nutrient Reduction Strategy, which outlines a science-based approach for reducing nutrient loads discharged from the state's largest wastewater treatment plants, in combination with targeted practices designed to reduce loads from nonpoint sources such as farm fields. This is the first time such an integrated approach involving both point sources and nonpoint sources has been attempted.

Iowa's farmers are continually making improvements to the environment through new and updated conservation practices. Farmers are always looking for the best-management for their farms. The Iowa Nutrient Reduction Strategy gives Iowa's farmers tools to make those decisions for their farms. Valerie Plagge

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #489.

Timestamp 1/10/2013 9:33 PM

**Name** John La Fratte

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I strongly support conservation praCTICES BE DONE A VOLUNTARY BASES. John La Fratte

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #490.

Timestamp 1/10/2013 9:54 PM

**Name** Ian Plagge

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would like to express my support for a voluntary nutrient reduction strategy. I think that fully funding a cost share type program that encourages science based practices to reduce nutrient loss is the right way to go about this issue. Some of the experts I have heard from have expressed concern that the target levels of reduction may not be achievable even if we completely stopped production agriculture. I would urge that until further research can be done to determine what can reasonably be achieved that any plan be a voluntary one that would not place added burdens on America's hard working farm families. Ian Plagge



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #491.

Timestamp 1/10/2013 10:02

Name Doug Adams

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

The plan for improving Iowa's water quality has been written. Now it is up to you to ensure that the Nutrient Reduction Strategy is fully funded to prove that Iowa's Farmers can make it work.

Every Iowa farmer that I know is doing the best that they can do on their farm conservation wise. Sure there is room for improvement, but new strategies take time to move into main stream agriculture. Voluntary conservation programs are the best way to get conservation on the ground.

On my farm I use no-till and strip-till to conserve soil and improve the efficiency of the fertilizer that I use to grow my crops. This fall I have tried for the first time growing cover crops. If it wasn't for IDALS state cost share program, I wouldn't have taken this first step in trying something new. I was able to get cost share for 62 acres of cover crops, but I went ahead and seeded cover crops on all of my bean stubble this past fall.

I hope to show my neighbors that cover crops do benefit my farm and our environment so that they will possibly try cover crops in the future. I have already talked to several farmers who are interested in trying some next year.

Science based, voluntary conservation practices will work if adequately funded. I will do my part, now can I count on your help" Let's show everyone what we Iowan's can do when we all work together. Doug Adams

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #492.

Timestamp 1/10/2013 10:06

Name J D Myers

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

To make this happen state lawmakers need to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

I've already implemented reduced tillage practices, planted buffer strips, enrolled in CRP and hope to implement more practices in the future to benefit my farm and the surrounding environment.

Thank you,

J.D. Myers J D Myers

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #493.

Timestamp 1/10/2013 10:12

**Name** Eugene Kenkel

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

We believe that voluntary conservation practices are very important in achieving our goals. Cost share programs have helped us realize some of our goals on our farm. We have previously rebuilt terraces and buffer strips, and just installed a grass waterway this past year. We are believers of no -tilling and have seen the benefits from it.

Costs of implementing conservation programs can be very costly - especially for farmers. It's a two way street, saving our lands is something we all have to work toward. Eugene Kenkel

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #494.

Timestamp 1/11/2013 4:30 AM

**Name** David Koopmans

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I would like you to support a science based state nutrient reduction strategy and also we need to keep our agricultural production up. Please also adequately fund the Nutrient Reduction Strategy and other cost share programs to help get needed conservation projects get going. I have put terraces in most of the land I farm and buy manure from another farmer so there is very little water that gets away. We as farmers are always looking for ways to make thing better if possible. David Koopmans

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #495.

Timestamp 1/11/2013 4:30 AM

**Name** Rodney Bortz

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I would urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

I recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

We don't need more laws and regulations. Rodney Bortz

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #496.

Timestamp 1/11/2013 4:31 AM

Name Daniel Rickels

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

This cooperation between all these groups and FARMERS is the best plan ever! We will get real science-based information in the field, without uncontrolled spending on practices that are questionable or flawed! There is a lot that I did not know about this nutrient reduction until I attended a meeting on it! We could use funding for some of these practices. Last year I finally got ok'd for cost share that I had been waiting for, for several years. There has been water running across and eroding a field of mine, coming off the hiway right-of-way. I paid out of my pocket to straighten out mess on their property-they were to busy till next year! I had a design from ascs to put in French Drain with tile all way to creek and seed new waterway, all was done except the seeding when ascs said they was out of money till next session! I said forget it I'm done. I waited for help with the DOT's water problem for years. I paid for it anyway, and my erosion is now handled! THIS will help with NUTRIENT REDUCTION! Daniel Rickels

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #497.

Timestamp 1/11/2013 4:31 AM

**Name** Dan Chism

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                               **Point Source**

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Secretary of Agriculture Northey,

My name is Dan Chism and I am a corn and soybean farmer from Emmetsburg, Iowa. I am also the owner of a commercial truckwash that is no longer in business.

I strongly urge you to use a minor portion of the states ending fund balance to fund Iowa's Nutrient Reduction Strategy and other conservation cost-share programs. In my mind, this is really the first time IDALS, DNR, ISU, and point and non point source polluters are all trying to work together to come up with a solution to try and reduce the amount of nitrates and phosphorus in our ground water.

As a steward of the land, I do everything I can to try and manage any and all leaching or runoff of my nutrients. However, this program goes a step further and addresses some things we are currently not doing or maybe we could do better.

Lastly, as a former owner of a commercial truck wash I can tell you from first hand experience that point source pollution from city sanitary sewers is a huge problem and only getting worse. We need to look into the possibility of trading nitrate and phosphorus credits between ag and municipalities.

I thank you for your attention on this matter and hope you will allow Iowa to be a leader in nutrient management. Dan Chism

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #498.

Timestamp 1/11/2013 6:22 AM

Name Brady Smith

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

If we don't take care of our farm ground, it will not take care of us. Bottom line. There are bad apples on every tree but trying to regulate all producers for their fantastic conservation strategies doesn't make sense.

It is important to have a science based nutrient reduction strategy that understands the dynamics of different geographies and management practices.

Please consider funding the IA Nutrient Reduction Strategy and more importantly, conservation cost share programs.

I no-till every acre I can along with contour farm our SW IA hill ground. Conservation is an imperative practice on our Heritage Farm. I am proud to be the 6th generation to care for the land, and plan want to leave this farm better than it was when I took over management practices.

Thanks a million for your time. Brady Smith



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #499.

Timestamp 1/11/2013 6:47 AM

**Name** Cindy Richardson

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would like to take the time to share how I think conservation practices should be voluntary and implemented by each state. It has always been a farmers thought how his water supply can stay clean, I know my grandparents always had grass strips around creeks, ponds and feed lots to help with run off. they never wanted to see bad chemicals or waste in that water, it was very valuable to them. My farm today uses a government cost share conservation program on all ground. We have cover crops and grass stripes and head lands this is a good thing, but some people I know see it as losing production, I think it is saving production do to less soil runoff. We need a voluntary program and still need to help find ways to keep agriculture production. Cindy Richardson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #500.

Timestamp 1/11/2013 7:17 AM

**Name** Larry Alliger

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am Larry Alliger. My family and I live on our farm near Gowrie Iowa. Recently, the state released a voluntary water management plan. The Nutrient Reduction Strategy is a science based plan recommended by IDALS and ISU.

Please approve this plan and pass the funding it requires.

Water is very important in our state and should be looked over by our state and not federal regulators in Washington. We use some contuer farming practices, use an integrated nutrient management plan, and many other practices to protect our water.

Please approve the Iowa Nutrient Reduction Strategy and fully fund this plan. Larry Alliger

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #501.

Timestamp 1/11/2013 7:45 AM

**Name** Brandon Vorthmann

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am writing to ask you to fund the Iowa Nutrient Reduction Strategy. It is important to have a science based program that recognizes voluntary conservation practices instead of a mandate from the EPA.

On my farm, I have already implemented practices to decrease nutrient runoff and conserve soil. Those practices include: reduced tillage systems and no-till, terraces, grass waterways, CRP filter strips, variable rate application of phosphorous and potassium, and GPS assisted application systems that prevent overlaps in application. In the future, I also hope to implement variable rate nitrogen application.

Please fund a program that recognizes these practices and encourages their continued and expanded use. Brandon Vorthmann

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #502.

Timestamp 1/11/2013 7:53 AM

Name Arlyn VanZante

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

As a concerned farmer I urge you to support a science based nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. Those who advocate an adversarial government mandate approach generally have little or no knowledge of agriculture or the conservation problems farmers face, plus the fact they do not even agree on what practices should be implemented. Today's farmers are intelligent enough to realize that it pays to conserve nutrients and top soil.

We need to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

I have added a mile of grassed waterways and added tile drainage all in an effort to reduce nutrient runoff all done voluntarily Arlyn VanZante

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #503.

Timestamp 1/11/2013 8:18 AM

Name Craig Stallman

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing to you today to urge your support for the voluntary nutrient reduction strategy put forth by IDALS and the DNR. We as farmers want to do the right thing, we are making great strides to conserve nutrients. What we don't need is the E.P.A coming in here and telling us the best way to handle this situation. The E.P.A's answer will be a one fits all solution that is not science-based.

With the surplus at the state level, I don't think it is too much to ask you to fund conservation programs. These programs are on a cost-share basis and would do much to help our situation.

No one is against clean water, help us to do a better job, this needs to be a voluntary program, with your help. Thanks for listening. Craig Stallman

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #504.

Timestamp 1/11/2013 8:32 AM

Name Richard Rickelman

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I strongly support the recently announced Iowa Nutrient Strategy. This is designed as a voluntary, targeted conservation program. This type of program will be more effective than a one-size-fits-all type that would result from more regulations. The Iowa Nutrient Strategy was developed by IDALS and IDNR with a science assessment by Iowa State University. This is a great example of different State agencies working together to develop a real world comprehensive assessment that shows what can work in various areas of our state. Iowa is a very diverse state, even some counties can have extreme diversities in soil types or topography. There are many cases of voluntary actions by farmers as individuals or working in groups to protect certain watersheds and having tremendous success that can be measured. On our own farm we have built several miles of terraces and have experimented with different cover crops without government help and some with. Bickering and pointing fingers and demanding more rules for the other guys is just more of the same thing we see in Washington. Let's make real progress by doing what works in different areas that is implemented by people with skin in the game. Richard Rickelman

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #505.

Timestamp 1/11/2013 8:36 AM

**Name** Denis Heatherington

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please fund the Iowa Nutrient Reduction Strategy as well as the states other conservation cost-share programs. Adequately funding these programs now will avoid more costly fixes in the future. Denis Heatherington

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #506.

Timestamp 1/11/2013 9:14 AM

**Name** Gregory Freshwater

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I strongly encourage you to support the plan to retain nutrients. As a pork producer I hear alot about the nutrient issue and run off from manure spreading and I feel that this would help make the publi more aware of the fact that we as farmers are trying to conserve our natural resources.  
Gregory Freshwater



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #507.

Timestamp 1/11/2013 9:14 AM

**Name** Roger Hawkins

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I think voluntary conservation and science is by far the best way to handle this problem. Roger Hawkins

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #508.

Timestamp 1/11/2013 9:16 AM

**Name** Joe Olson

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I want to express my support for state nutrient reduction strategies that are science based and recognize the importance of voluntary conservation practices. As regulations on nutrients and conservation will continue to increase in the future its important that the Iowa Nutrient Reduction Strategy is funded to ensure we are implementing sound conservation projects.

With the high value of farmland and concern over future overregulation farmers and landowners want to voluntarily implement conservation practices and funding to help the projects is important. Joe Olson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #509.

Timestamp 1/11/2013 9:18 AM

Name Jim Mitchell

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

Please accept my comments concerning the Iowa Nutrient Reduction Strategy. I think it is quite clear that that we as Iowa farmers need to be good stewards of the land. I think it is also goes without saying that Iowa's farmers want to do everything they can to reduce nutrient losses on their fields. It is not only an environmental benefit but also an economic benefit to eliminate runoff.

I urge you to adequately fund the Iowa Nutrient Reduction Strategy and other cost-share programs that help us reduce nutrient runoff. Much of this money is used by farmers to fix/enhance waterways in our fields that trap these precious nutrients and topsoil, build terraces to stop erosion, and add buffer strips along creeks and streams. Many of us use manure to build soil tilth and also reduce our cost of production. We are very aware of the sensitivity of our waterways and want to ensure runoff of these vital nutrients is minimized. Jim Mitchell

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #510.

Timestamp 1/11/2013 9:27 AM

**Name** Jacob Hackman

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am writing to you today to support the voluntary conservation practices that Iowa is doing today to help reduce nutrient reduction. I feel farmers know their land the best and what works in the different parts of Iowa. My family and I have over 100 acres in a CRP program, it is nice to see all the wildlife that is out in those fields. We are trying to do our best to maintain agricultural production. Thank you for your time.  
Jacob Hackman

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #511.

Timestamp 1/11/2013 9:28 AM

**Name** Keith Kroneman

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing to ask you to support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. On our farm we are using minium till, notill, grass waterways and grass strips along steams to help our farm and the enviroment. PLease help adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost share programs. Keith Kroneman

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #512.

Timestamp 1/11/2013 9:43 AM

**Name** Soo Greiman

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I would like to express my support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge you to fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. In the past, Iowa's failure to adequately fund these programs has delayed needed conservation projects.

As a part of a family farming operation I can assure you we have implemented a variety of conservation practices to benefit our farm and the surrounding environment including minimum tillage, crop rotation, construction of earthen berms and terracing. Soo Greiman

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #513.

Timestamp 1/11/2013 9:52 AM

Name Arvin Boote

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I believe that it is vitally important produce crops on our farms and maintain or build up our soils. We all have experienced what happens when the weather doesn't cooperate and we have poor yields. We need a combination of resources and methods to provide best management practices in protecting the environment and producing food, fiber and fuel for our world.

Please use the science-based methods and not pie in the sky thinking. Also, provide the funding necessary for cost share programs. Many farmers are waiting for funds to be available. I use contour farming on my own fields that helps to keep my soil and nutrients in place. I can't afford to have them be wasted. We need a variety of production methods because Iowa's farmland varies from county to county and field to field. A one size plan will only fail. Thank you for your attention to this important issue. Arvin Boote

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #514.

Timestamp 1/11/2013 10:10

**Name** Richard Kerr

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I support a science based nutrient reduction strategy that will recognize voluntary practices. We are still repairing and putting new waterways into use every year to help reduce runoff and stop erosion. I fertilize based upon crop removal and use technology to help place nutrients where they are most beneficial. I do not like to see my money run off the field.

Please fund the Iowa Nutrient Reduction Strategy adequately as well as other conservation cost share programs. Richard Kerr



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #515.

Timestamp 1/11/2013 10:13

**Name** Leon Kessel

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I encourage you to support the Iowa Nutrient Reduction Strategy and cost-share conservation programs. These programs are a great benefit to farmers as we try to preserve Iowa's rich soils and water quality through the stresses that recent weather conditions have placed on the state. Leon Kessel

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #516.

Timestamp 1/11/2013 10:17

**Name** Ronald Underwood

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

Considering the advances that modern production agriculture has made in a such a short and important time and how the demands on all of us have changed in regaurdes because of this, does it not seem it would be rediculos not to use good science based stategy to manage nutrient reduction" Being a livestock producer and grain farmer nutient mangement is an impostant part of our management scheme. That being said its important to us as well as all of the stake holders in this that decisions are based on good logic and not on emotion. Ronald Underwood

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #517.

Timestamp 1/11/2013 10:22

**Name** David Wrage

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I would ask that you please consider a voluntary program for nutrient reduction. I have been practicing this for several years and have found that I can better manage my farm and my production. I would also encourage you to make sure adequate funding is available to fund the Iowa Nutrient Reduction Strategy, along with all conservation cost share programs. Iowa farmers firmly believe in conservation practices to preserve our natural resources in addition to trying to reduce our input costs. David Wrage

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #518.

Timestamp 1/11/2013 10:32

**Name** Lori Heemstra

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

My husband and I have switched from conventional tillage to vertical tillage to help reduce soil erosion. And we have also added some CRP waterways. We have manure management plans according to the p-index and we always knife our manure into the ground in the fall. Lori Heemstra

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #519.

Timestamp 1/11/2013 10:34

Name Scott Tholen

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please support a state run science based nutrient reduction strategy that relies on voluntary conservation practices. On my own farm I have started using covercrops to help control erosion and build soil quality. One of the many benefits of this is the covercrops ability to scavenge extra nutrients in the soil which will prevent them from entering the rivers and streams. This was a voluntary action on my part with no farm program or state help. I just wanted to improve the ground I farm. Voluntary action like this is the cheapest and possibly the most effective way to improve soil and water quality while still being able to achieve maximum agricultural production.

Cost share programs funded through the state have also beneficial and will also help improve soil and water quality. The Iowa Nutrient Reduction Strategy should be adequately funded. The benefits gained through that system can be used as an example of success and reflected upon when encouraging a voluntary conservation system. Lead by example. Thank you for your time. Scott Tholen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #520.

Timestamp 1/11/2013 10:34

**Name** John Finley

**City** Elkader

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**  **Nonpoint Source**  
 **Policy**  **Point Source**

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General comment on the Iowa Nutrient Reduction Strategy, this is a very positive move by all parties involved to address an important issue up front before EPA writes laws. This is a very common sense approach that involves the correct parties in the state of Iowa to work on an important environmental issue important to all. Making more laws is not necessary these days we have more than enough on the books and having Washington D.C. EPA folks make rules for Iowa is not good business. Let the good people of Iowa work the nutrient reduction strategy and solve their own issues! John Finley, Elkader, Iowa

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #521.

Timestamp 1/11/2013 10:38

**Name** James Rodebush

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support a science based Nutrient strategy and encourage the adoption of voluntary conservation practices. Putting science and farming know who can solve the problem. Letting government and agencies set the regulations and tell others (farmers) what to do will create more problems than it will ever solve. James Rodebush

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #522.

Timestamp 1/11/2013 10:38

**Name** Russ Davis

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

Please support the measures adopted by IDALS, IDNR and Iowa State re: the nutrient management plan to conserve our states nutrient and soil resources. The plan they have put forth is scientifically supported and worthy of funding by the state. I am encouraged as I see more efforts being made by local farmers to conserve our nutrients, i.e.soil testing, cover crops, buffer strips, reduced tillage, precision fertilizer application, precision farming, high tech seed etc., all having a positive effect on our resources and the farmers bottom line.

Thank you! Russ Davis



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #523.

Timestamp 1/11/2013 10:40

Name Herbert Scott

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

As a farmer in the rolling hills of central Iowa, it is obvious to me that there is a tremendous variation in topography, soil type, drainage, viable tillage practices, crops/roughage needs for a given farm operation, etc.

Gumbo on the river bottom likely demands more tillage and has less erosion and nutrient loss potential than the Tama soil on the hills. A one-size-fits-all approach could be expected to thrust upon us if a science-based, flexible voluntary approach is not promulgated.

Please adequately fund the proposed Iowa Nutrient Reduction Strategy and the conservation cost-share programs that will provide the needed development of the multiple effective practices that farmers will readily adapt when they are demonstrated to be viable and effective on their operation.

We already utilize no-till, grassed waterways, headlands, crop rotation, GMO seeds and GPS fertilizer application as ways of maintaining needed food production with maximum utilization of nutrients and minimum loss of water and nutrients.

Help us to continue to move forward with the proposed Nutrient Reduction Strategy by adequately funding this well thought out strategy to facilitate a better future for all of us. Herbert Scott

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #524.

Timestamp 1/11/2013 10:49

Name Brian Lensch

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would like express how important it is to support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

We practice voluntary conservation in our own operating with buffer strips and grass waterways to control runoff. Farmers in our area are very conscience of the water we drink we all want to make sure the nutrients we use for our crops do not get away because that costs us money. I believe a government has a place to give farmers tools such as cost-sharing to help them make the decisions what is best for their farm and the environment. A broad brush approach by creating more regulations on farmers is not an effective way to control nutrient runoff.

I urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. Brian Lensch

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #525.

Timestamp 1/11/2013 10:54

Name Max Vandelune

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

I have watched four generations farm: My Grandfather,Dad,two Brothers, and Nephew. I have watched in the fifty years I have farmed the changes in the way we farm. The one thing that many non-farmers don't understand is farmers strong feeling that we want to leave the land and enviroment a better place for the generations to come. We are closer to the enviroment as farmers than just about anyone.

We have gone from heavy tillage to a no-til program. We have moved to modern technology such as GPS, grid soil testing, varible rate application, Seed that help us cut back on the chemicals, and the use of conservation structures such as the 20 plus miles of terraces we farm. ALL done voluntarily. Some conservation practices were cost shared and some on our own. Our next project is to move the inlet pipes next to the terraces so the modern wide equipment can be utilized.

I would ask you to support and fund a science-based state nutrient reduction strategy. Farmers are like a rope. They are better pulled ahead by leadership, education, peer examples, and voluntary cost share programs. They like the rope that is pulled not pushed by a mandated program. Thank you for your hard work in making a difference in peoples lives. Max Vandelune

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #526.

Timestamp 1/11/2013 10:56

**Name** Denise Crock

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. Denise Crock

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #527.

Timestamp 1/11/2013 10:59

Name Steven Langland

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

As a conservation farmer I am encouraging you to adequately fund any and all conservation programs and in particular the Nutrient Reduction Plan. The past delays in funding programs has delayed needed conservation programs in all parts of the state.

I am a third generation farmer who's roots in conservation efforts go back to my grandfather during the days of the CCC setting contour lines on this farm. My father and my late uncle continued to build on those efforts and now I and my retired father are continuing practices, esp as part of the Bear Creek Watershed project. We had done many projects over the years, but one in particular would help with nutrient run off and that would be putting in two retaining ponds and a diversion terrace below our present feeding area for our beef cows. The preliminary work has been done, but the future of the project is uncertain and may never be done without additional and consistent funding.

Almost all farmers are eager to participate in programs of conservation if there is adequate funding to participate on a voluntary basis, so let's please continue this effort now and into the future. We presently have enough rules and regulations, so any enforced mandates only complicate and frustrate matters.

I would invite anyone of you to contact me for more information and also if interested a personal tour of our farming operation. Steven Langland

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #528.

Timestamp 1/11/2013 11:05

**Name** Heath Greiner

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

We do not need more government in our lives especially in farming. Follow the ISU guidelines recommed practices and give it time and farmers will adapt when they see and understand the benefits of the practices. Maybe add rewards to following and showing prof of the practices. Its easier to pull than push cattle.. Same goes with people. Heath Greiner

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #529.

Timestamp 1/11/2013 11:09

**Name** Larry Foley

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I support the Iowa Nutrient Reduction Strategy and I am asking for your support also. As a farmer in north central Iowa, I believe the work IDALS, DNR, and ISU put into this program should be utilized. ISU has developed practices which I can follow to put in place conservation practices on my farm. These would be scientific, reasonable, and cost-effective. Again I support the strategy and hope you would too. Larry Foley

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #530.

Timestamp 1/11/2013 11:17

**Name** Gerald Morgan

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please fund the Iowa Nutrient Reduction Strategy and state's other conservation cost-share programs. We need voluntary conservation practices. Gerald Morgan



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #531.

Timestamp 1/11/2013 11:19

**Name** David Fordyce

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**  **Nonpoint Source**  
 **Policy**  **Point Source**

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Secretary of Agriculture Northey,

This is just a short note about nutrients and how we are trying to incorporate these nutrients in our soil to enhance our farms soil profile. Through many years and decades of work we are able to apply our nutrients from our dairy operation into the soil and use the benefit of our crop rotations to keep our soil alive. This program works for us...but I am not sure if would be good for others. They should have a right to choose. I would encourage you to continue to let this be a voluntary choice we have. David Fordyce

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #532.

Timestamp 1/11/2013 11:24

**Name** Stephen Pacha

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

As the proud owner of some of the most valuable farm land in the world, I do my utmost to preserve and protect that land and its value. What bureaucrat in Des Moines or Washington D. C. knows better than I do, how to do that" Stephen Pacha

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #533.

Timestamp 1/11/2013 11:32

**Name** Lynn Jenkind

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I have seen the specifics on what some farmers have done to reduce nutrient runoff and I have been impressed. I don't see how a voluntary program will address the problem sufficiently in the short term or the long term. I recall the state logo Iowa you make me smile. The policies and practices that have led to removing slews, draining wetlands, clearing every tree and bush from fields, drainage ditches along roadsides and tiling without any barriers to creeks and rivers does not make me smile. My quality of life has taken a big hit. The natural beauty driving along country roads is gone. Lakes and streams are not fit to swim in or fish. We all know how little land has been set aside for public use in Iowa. We should at least have some standards for keeping public lands and right of ways in Iowa protected and we should not be polluting other states or the gulf.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #534.

Timestamp 1/11/2013 11:35

**Name** Dennis Meints

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I am asking you to support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices. I feel we need to adequately fund the Iowa Nutrient Reduction Strategy and other conservation cost-share programs. Needed conservation projects will be kept on track with these funds.  
Thanks for your support. Dennis Meints

**Name** Gary Boswell**City****State****Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

Secretary of Agriculture Northey,

I would like to tell you that I strongly support the proposed Nutrient Reduction Strategy and urge you to support it as well. Science based strategies that can be implemented site-specifically are the most effective in helping reduce run-off into our lakes and streams. As farmers we know our individual fields, and how they react to weather events. We can most effectively determine the most beneficial efforts to improve nutrient run-off. I personally have been nearly 100% no-till for the last 17 years, even on the river bottoms. I also use field turn borders that my father used since the 1940's to prevent endrows not following a contour. Soil conservation is critical for our society to flourish into the future.

I would encourage more funds to be available for conservation practices in the future. There never seems to be enough money for structures. In particular, I would like to see some funds for stream bank erosion protection. I have witnessed on my farm the erosion of 70' of stream bank lost along the Middle Nodaway River. The buffer width of 66' seeded in 2001 was completely eaten away after 10 years and did nothing to stop an estimated 110,000 Tons of nutrient rich bottomland soil from entering our water ways. We need to focus on what works, not what feels good. Thank you. Gary Boswell

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #536.

Timestamp 1/11/2013 11:48

**Name** Dick Bishop

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Farmers need no more regulations of any kind, they are good stewards of the land now. Dick Bishop

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #537.

Timestamp 1/11/2013 12:10

**Name** Daniel Cramer

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I would like to add my voice in support of the Iowa Nutrient Reduction Strategy.

I am a farmer and grew up on a farm. I remember we used to plow soybean ground! Now corn ground is hardly plowed. I have a no-till drill. I have buffer strips. I have planted cover crops. I have seen the yellow side hills turn brown and the brown side hills turn black as the soil continues to improve.

It was called the "muddy Mississippi" before row crop farming had the present impact on the watershed. I was in New Orleans a year ago--the National Park Service guide explained that a big part of the problem is there is not enough silt coming down the river to replenish their wetlands.

Farmers do the right thing with the right tools and the right information. A voluntary, science based approach to dealing with water quality issues is a great way to produce our food, maintain our farming economy and water quality. Daniel Cramer

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #538.

Timestamp 1/11/2013 12:10

Name Clark BreDahl

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I hope you will support the implementation and funding of the Iowa Nutrient Reduction Strategy and other voluntary conservation cost-share programs during this session of the Iowa Legislature. This science-based, voluntary approach to soil and water conservation and pollution prevention has been used successfully by Iowa farmers for years.

On our own farm, it has allowed us to construct intake terraces, install waterways and implement nutrient management strategies on our cropland and implement rotational grazing with improved water distribution to better utilize our pastures.

Let's stick with programs proven to work and recognize that change comes faster and in bigger increments applying a carrot rather than a stick.

Thanks for your consideration. Clark BreDahl



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #539.

Timestamp 1/11/2013 12:41

**Name** Brian Rosburg

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

Please fund the nutrient reduction strategy. There is not a "one size fits all" strategy to solve this problem. With science and technology based research, IDALS, DNR, and ISU have found that voluntary conservation practices have the greatest benefit to water quality in Iowa. I am a Iowa Farmer, on my farm we have different strategies to make sure we are not contaminating the water and some I know that for some strategies it is very costly, that is why I also ask you to fund other conservation cost-share programs so us farmers can do the best we can to help. If I were to contaminate the water with the fertilizer or chemical that I purchased (at high prices) to benefit my crops, my farm would lose the money it paid. I apply what the crop needs in that crop production year to reduce the amounts lost. Contamination not only hurts water quality it hurts my profits. We strive to be stewards of the land and protect what we have been given on this earth so our future generations can enjoy it too. Thank You. Brian Rosburg

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #540.

Timestamp 1/11/2013 12:53

**Name** Jason Folsom

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support Iowa's nutrient reduction strategy. Farmers like myself want to be part of the solution when it comes to reducing pollution. I applaud a voluntary program and would be happy to participate in it. But we are going to need ample funding if we are going to implement these practices. All of the strategies in the world don't mean a thing if we can't implement them. We have the best farmers in the world. Please give us the opportunity to show it. Jason Folsom

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #541.

Timestamp 1/11/2013 1:01 PM

**Name** Mark Bausch

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I know the importance of having clean water in our state. I believe farmers have and are being conservative with field tillage and are making efforts to reduce water runoff. I also believe they are not over applying crop nutrients.

Please adopt the nutrient reduction strategy as written. Also, continue to fund cost-share conservation programs as well as this nutrient program.

I don't feel that it is necessary at this point to regulate commercial fertilizer use. Mark Bausch

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #542.

Timestamp 1/11/2013 1:06 PM

**Name** Norbert Kruse

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I strongly urge our State Lawmakers to support the Iowa Nutrient Reduction Strategy along with our State's other Conservation Cost-Share programs.

I am confident that the UNI, the Dept. of Agriculture & Land Stewardship, along with the DNR and our Iowans involved with Agriculture within our state can & will determine and implement practices that are best for the land that they live on and take care of.

Who could know better than the persons actually caring for the soil and waterways within our state" Norbert Kruse

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #543.

Timestamp 1/11/2013 1:13 PM

**Name** Steven Yaley

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would like to voice my support for a science based stat nutrient reduction strategy that recognizes the importance of voluntary conservation practices.

I urge you to adequately fund this program and other conservation cost share programs. Steven Yaley

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #544.

Timestamp 1/11/2013 1:34 PM

**Name** Raymond Foerster

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing in support of the Iowa Nutrient Reduction Strategy. I believe that a state specific, science based approach to properly manage nutrient application to cropland is the best way to meet the water quality mandates of Iowa. We, as producers, need to be able to use this science based approach to maintain production that keeps both crop and livestock farmers in business. Adequate funding of this project is extremely important. In the past inadequate funding has delayed needed conservation projects. Please support both the adoption and funding of the Iowa Nutrient Reduction Strategy.

, Raymond Foerster

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #545.

Timestamp 1/11/2013 2:06 PM

Name Kim Hicks

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

All Iowa farmers need to be good stewards of their own land, rented land and their neighbors land.

I think we all could work and help each other out by implementing nutrient reduction in regards to our soils.

I do think that the research is needed to take care of the environment, as well as helping the farmers maximize their yields.

There are WAY TOO many farmers coming here from out of state that do not give a hoot about the ground they are renting. They are in there ripping everything up, hurting the land and everyone around them. We need some sort of task force to scout these farms and not depend on whistleblowers. As long as these non-conservationist farmers (but still collect direct payments) are still out there much of this land does not stand a chance.

My family follows the conservation plans, no-tills, uses buffer/filter strips etc...

What more can we do "" Kim Hicks

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #546.

Timestamp 1/11/2013 2:08 PM

**Name** Joyce Brincks

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

My family supports a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I request your support to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. Joyce Brincks



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #547.

Timestamp 1/11/2013 2:11 PM

**Name** Randy Barnard

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Iowa's farmers have been involved with voluntary conservation practices for decades. It has been determined that erosion and chemical runoff can be reduced voluntarily. I live in Clarke County and we have experienced decreases in the pollution of West Lake due to voluntary practices in the past.

It is very important that these programs continue and are adequately funded at the state level.

Please help Iowa's farmers to continue to take care of and improve the natural resources we have been given. Randy Barnard

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #548.

Timestamp 1/11/2013 2:15 PM

**Name** Raymond Ransom

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I fully believe that a large majority of farmers have taken steps to use resources to the best use mainly due to economics . We have cut down on applications to become more efficient Raymond Ransom

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #549.

Timestamp 1/11/2013 2:42 PM

**Name** David Rydstrom

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I ask for your support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I would ure you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. David Rydstrom

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #550.

Timestamp 1/11/2013 2:48 PM

Name Kevin Frank

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I work in the agriculture retail working with many growers and their seed, chemical, fertility, and sometimes even talk some about different tillage practices.

I know for a fact that farmers want to do what is right and help the environment. Farmers know that anytime they are losing their soil they are also losing fertility, and given the chance to save their soil and farm in a way that is environmentally friendly they will.

However, farmers also sometimes need to be educated on how to do that, but once they know the facts they will do what is right.

I believe that if we make some programs available that growers will voluntarily change and farm in a way that is friendly to the environment.

So please support any possible voluntary Conservation, this would far out weigh any regulation, and farmers would receive it well. Kevin Frank

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #551.

Timestamp 1/11/2013 2:59 PM

**Name** Phyllis Vander Linden

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Please adequately fund the Iowa Nutrient Reduction Strategy so conservation projects can be accomplished. Voluntary conservation is the way to go . We do not need more government regulations!

We had waterways put in 40 years ago and they have served us well. Especially when we have a heavy rain.

Farmers care about their land and know best how to take care of it properly. Phyllis Vander Linden

Name Veronica Lack

City Iowa City

State Iowa

Providing comment on the following sections:

<input checked="" type="checkbox"/> Executive Summary	<input checked="" type="checkbox"/> Nonpoint Source
<input checked="" type="checkbox"/> Policy	<input checked="" type="checkbox"/> Point Source

I now live and farm downstream from an on-going point source pollution plume of anhydrous ammonia, atrazine and high lead that continues to endanger more lives by draining land in Mitchell County Iowa down a line of sinkholes. This pollution plume starts in a sensitive karst aquifer recharge area with no legal drainage outlet south of St Ansgar Iowa that was written about in the past by Robert Libra. It was later altered from a Wetland (where the Section 10 Cedar (W) Township used to be under water) since the water table there was above surface at places and perforated with sinkholes in that huge swale area. The Iowa DNR attorneys and Russ Tell and Paul Sweeney the then director of NRCS could not believe that Mitchell County would condone the building of these up-grade flood drainage channels through lines of sinkholes in this karsted area. But the plans were on Jim Hyde's, Mitchell Co Engineer's, office wall in 2006 and 2007.

In 2004 after we had had our well test results withheld from us for 12 years because I had complained about the semi loads of dead animals in between Dean Sponheim's and Bradley Johnson's farmsteads in 1993, I received two letters warning that the IDNR had known about our aquifer's being polluted so bad that no one not even animals should be drinking the water. The DNR sent along one of the polluters well drilling record, Bradley Johnson's, who had had the former Mitchell County Engineer out to dig ditches to the Echo Ave box culvert. This digging through the karsted limestone in the bedrock by Bill Groskurs the former Mitchell Co Engineer opened a sinkhole north of Bradley Johnson's house where the new ditch formed a Y. The land around that Y started draining back down that sinkhole and even Dean Kleckner's (the former head of the Farm Bureau's) land to the west of my farm was draining west down that sinkhole too. I complained as did Carl Christiansen and others downstream as the manure from the two feedlots at Brad Johnson's and his cattlelot to the north were washing down the two ditch extensions to the NW and SW and down the sinkhole. Unbeknownst to me the governments program to prevent high animal loss numbers paid for Bradley Johnson, the polluter, to have a new well, and Dale Adams the DNR agent that I had argued with to get a test done on my well did come back in December of 1993 and did do a test after the effluent washed through as he claimed, there was no polluting. If the DNR had given me a copy of that 1993 well test report I and Carl Christiansen and Ruth Morishe could have had a new well drilled then to protect our families and our animals would not have died or been docked when they did make it to market for miscellaneous masses and tumors. The Nitrates tested at 78 to 95ppm in 2004 and I didn't get the 1993 well test result until late 2009. Then this last fall I received the copies of the Ammonia Nitrogen as (N) test results done on the wells in that plume that had been tested downstream after I had filed the original complaint in 1993 and the second complaint in 2004. The Anhydrous Ammonia in the Olsen's well just downstream from me was highest at 12.2 and varied mostly by the time of the tests compared to when applications of Anhydrous Ammonia had been done on Section 10. (Both of the Olsen's died after cancers.)

Iowa's economy and the lives of it's people depend on protecting our natural resources. High quality water and topsoil are vanishing with the proliferation of unsustainable planting of corn on corn. Wetlands are being drained by ditches into the Upper Cedar Valley Group Aquifers in Mitchell County, Iowa, Cedar (W) Township, Sections 10 and 11 and other areas without legal drainage outlets.

Government agencies (the IDNR and Mitchell County's Sanitarian, L G Wagner) failed to provide test results from 1993 and later despite my complaints regarding the water quality. When IDNR's 1993 test result was finally provided in 2009 the levels were comparable to the test results for the Minnesota dairy farm family in the documentary film "Troubled Waters A Mississippi River Story". That family farm also suffered livestock death, causing them to drill a new well as they got their well test report given to them. This film illustrates some sustainable farming practices for applying Anhydrous Ammonia which was the biggest pollutant in our wells and the cause of the Dead Zones in the Gulf. We need Mandatory enforcement of the Clean Water Act as leaving it up to these polluters has killed my husband and neighbors and our animals downstream from them. Yet the polluters benefit yearly with incomes gained from draining their wetland down sinkholes into the drinking water of Iowan's downstream. My renters well downstream is now polluted with anhydrous ammonia and nitrates in Bremer County. And even the City of Iowa City's water that I now use tests positive for Anhydrous Ammonia. Why does the IDNR keep hiding this on-going point source pollution and protect those polluting our water? Everybody I know drinks some water even coffee that may be from a city or private well. We deserve to raise our children on water that doesn't have AG chemicals in it. It is easier to keep the man-made chemicals out of our aquifers than to filter them out. Des Moines Iowa installed multi-million dollar nitrate scrubbers to keep the total of the Anhydrous Ammonia and the Nitrates test below 10. It is getting harder and more expensive to keep those tests' total below 10 for the EPA. This was a factor in why the Zenia Rural Water system is going broke. Do public well utility's inform users of their anhydrous ammonia contamination? Not that I know of in Iowa City, the hygenic lab employee that first got me a copy of my \$160 group of tests on my kitchen faucet water, said they were glad I had kept trying to get some attention to this big issue.

I repeat we need Mandatory and strict enforcement of the Clean Water Act because the State of Iowa audited the IDNR and found in about 2009 that there was no enforcement of 16 of the Clean Water Act laws. The IDNR continues to allow this particular point source pollution to continue because of statements like Jon Tack's IDNR attorney, "I can't help you Veronica I'm related through my wife to Bruce Johnson" My reply was who is Bruce Johnson? And we all drink water, don't we?

Anhydrous Ammonia and CAFO pit manure should be banned from application on drained wetlands or areas with such minimal soil depths that allow for any applied chemicals to wash right down through the karsted limestone into our drinking water. The USDA-NRCS could add Anhydrous ammonia fertilizer to the ROSOL II evaluations NRCS does for the DNR manure management plans. Then a computer programmer could add criteria to the ROSOL II evaluations that checks for soil depths and sets buffer distances from sinkholes, swales, waterways, rivers and all streams (including intermittent and rising). This could make directions to keep not only the sustainable farmers on task in preserving their soil and water quality, but also help correct the polluters. This years Farm Bill needs to do away with direct payments and fund sustainability programs not line the pockets of the same people that dig ditches to sinkholes and pollute the ground water for the Iowan's downstream from them.

## Iowa Nutrient Reduction Strategy

Online comment submissions

Page 2 of comment #552.

Timestamp 1/11/2013 3:07 PM

**Name** Veronica Lack

**City** Iowa City

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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This domestic terrorism deserves jailtime, even though no one is held accountable when their actions cause deaths in this self-centered Iowa, even in on-going and wide pollution cases. So the pollution will get worse and if there is ever a Clean Chemical Act maybe AG chemicals will have to be tested safe for the environment they are dumped in now. And the Koch brothers and the big oil companies that produce Anhydrous Ammonia may go broke paying for the clean-up? LOL, not likely that anyone will clean it up and what will that do to property values? Man-made chemicals don't die off in the cold and dark of an aquifer like the biological manure fertilizer. They (Anhydrous Ammonia fertilizer and Atrazine) are showing up higher in the well tests while the bacteria tests go back to nil when the sinkholes are not taking on water.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #553.

Timestamp 1/11/2013 3:22 PM

**Name** Daniel Elliott

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

We farmers ask you to fund science-based state nutrient reduction strategy. Farmers want what is best not only for them, but also for the soil. Science-based strategies help everyone. But nobody wants to be told what they have to do. Please continue to fund a cost-share program. Thank you for your service to the state of Iowa. Daniel Elliott



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #554.

Timestamp 1/11/2013 3:27 PM

**Name** Charles S Helland

**City** Huxley

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Hi,

I am a Farmer in central Iowa and we are trying to help soil and water quality by using buffer strips, terraces, and no till planting soybeans in standing corn stalks.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #555.

Timestamp 1/11/2013 3:50 PM

**Name** Charlie Schafer

**City** Adair

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Congratulations to everyone involved in the creation of the Iowa Nutrient Reduction Strategy. Iowa has long been a worldwide leader in agricultural production with a sincere concern for our natural resources.

I am excited by your vision to create off-farm water quality benefits through on-farm conservation practices, in an effort to hold down future point-source-compliance costs and pay for environmental performance that is measurable and meaningful.

With the advancement of this bold strategy, you demonstrate a commitment to position Iowa as a leader in developing and implementing a market-based solution to finance, construct, maintain, and manage agronomic and structural conservation practice on working agricultural lands.

Our nation's current cost-share based conservation delivery system has served us well to this point, but the credit trading section you have included in your strategy indicates to me that you clearly recognize that innovative funding streams are necessary to incentivize private landowners to move to a new level of conservation stewardship.

We encourage you to provide the leadership required to develop an environmental credit trading program to efficiently and cost effectively improve water quality, reduce flooding, improve wildlife habitat, support our agricultural industry, and improve the quality of life for current and future generations of Iowans and our downstream neighbors.

Respectfully,

Charlie Schafer, President

Agri Drain Corporation

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #556.

Timestamp 1/11/2013 3:57 PM

Name Tyler Schildroth

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

It is imperative to fund The Iowa Nutrient Reduction Strategy because accurate data can not be collected without a solid, science based strategy. Remember, farmers are not the only individuals applying nitrogen. What about the individuals who apply nitrogen on their lawn, who don't know how to read a label" Do you think they always know how much to use, or think more is better" Hard data needs to be collected from run off of city streets, water treatment plants, and fields. That is why I believe a plan can not be implemented without data being collected through this strategy. Tyler Schildroth

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #557.

Timestamp 1/11/2013 4:14 PM

**Name** Jeff Goodell

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I would just like to let you know that I encourage your support for a science-based state nutrient reduction strategy. This strategy would entail voluntary conservation practices that we need to maintain agricultural production.

By supporting this strategy we need funding for these programs and other programs that support conservation practices. Jeff Goodell

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #558.

Timestamp 1/11/2013 4:16 PM

**Name** Daryl Haack

**City** Primghar

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I am a farmer and I am in favor of the Nutrient Reduction Strategy. I use no till and strip till on all of my crops on a voluntary basis because I believe I save soil and money and get comparable yields. I also use chemicals only when necessary and do not apply nitrogen until the soil temperature has dropped below 50 degrees and is forecast to stay there. I believe with some education and perhaps some initial cost share money more farmers would also use these practices.

Daryl Haack

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #559.

Timestamp 1/11/2013 4:39 PM

**Name** Lennon Brandt

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Farmers in Iowa are continuing to voluntarily improve their conservation practices. I began no-tilling soybeans in 1991 and now I also do fall strip-till for my corn. All of my fertilizer and manure are applied under the surface to protect its value as a nutrient and also prevent any run-off. So I along with other farmers do these practices for two reasons, increased profits and to protect the environment. Your support for a science-based Iowa nutrient reduction strategy will be more beneficial to Iowa than just more pages of regulations. Please fund Iowa's conservation efforts. Thank you, Lennon Brandt

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #560.

Timestamp 1/11/2013 4:40 PM

**Name** Brandon McHugh

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I just want to let you know that I would like to see the state move for a more science-based nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I want to urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

I currently use no till and minimum till where needed in my farming operation.

Thank you for listening. Brandon McHugh

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #561.

Timestamp 1/11/2013 4:40 PM

Name Alan Jensen

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I strongly suggest your support for a science-based state nutrient reduction strategy that includes voluntary conservation practices that we as farmers need to maintain top agriculture production while reducing N P pollution of our waters. I urge to read the scientific studies done by Iowa State University, Iowa Department of Agriculture, and the DNR. This plan is so important to reduce the hypoxia that is continually affecting more of the Gulf of Mexico every year. I was very impressed to find that this is a joint effort by all three entities to address a very important situation scientifically instead of finger pointing and mandating "one size fits all" type regulations.

I also urge you to support and adequately fund not only this program, but also other cost share conservation programs that would reduce nutrients leaving our soil through erosion and excess water run off. I like most farmers believe in saving our precious top soil as well as keeping our state's water sources from being polluted. When there are adequate funds available for conservation programs farmers will voluntarily apply these practices, decreasing the need for stricter regulations.

I am continually taking advantage as cost share programs such as CRP, water ways, filter strips, and whole-farm CSP programs. Without the cost share funds, some of these practices would not be affordable to me. Please consider supporting this nutrient reduction strategy. Alan Jensen



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #562.

Timestamp 1/11/2013 4:41 PM

**Name** Tim Palmer

**City** Truro

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                               **Point Source**

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Secretary Northey and Director Gipp,

The Iowa Nutrient Reduction Strategy is a huge step forward to address the environmental concerns of the state and the Mississippi Basin. However, not all of the problems with nutrient delivery to the Gulf of Mexico can be blamed on ag land or municipalities. The land that is controlled by easement or owned by county, state or federal governments for road and parks also contribute. It is not uncommon to see classic gullies formed along roadsides.

I believe it is very important that Iowa Department of Transportation and the county governments are involved to ensure that public lands are also included as we try to address the many ways that sediment is moving through our watercourses to the Mississippi River. Soil and Water Conservation Districts are uniquely positioned to work with county government to identify and help to develop practices and management that will help abate erosion and nutrient movement.

Respectfully,

Tim Palmer

Truro, Iowa

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #563.

Timestamp 1/11/2013 4:55 PM

**Name** Hans Schnekloth

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I think a science based voluntary nutrient protection plan is the only sustainable option. All other strategies will fall short. Thanks for your time.  
Hans Schnekloth

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #564.

Timestamp 1/11/2013 5:03 PM

**Name** Jon Bakehouse

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am encouraged to see that Iowa is putting together such a common sense nutrient reduction strategy, and I am eager to apply and improve our farming operation's reduction strategies already in place. I hope the money needed to kick this plan into action is readily available, and I trust that you will do everything in your power to see this strategy come to fruition. Thanks for all of your hard work. Jon Bakehouse

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #565.

Timestamp 1/11/2013 5:05 PM

Name Randy Caviness

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

My wife , 16 year old son and I operate a 4,000 acre Family Farm in south west Iowa. Over the years we have installed over 4 miles of terraces , in stalled buffer strips, filter strips and have been avid no till farmers for over 25 years. We have our fields grid sampled in 2 1/2 acre grids to insure proper nutrient application. Conservation and keeping our soil and nutrients on our farm is very very important to us.

We would like to ask for your support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

We urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. Randy Caviness

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #566.

Timestamp 1/11/2013 5:19 PM

Name Doug Lansink

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

As a lifelong family farmer I know the importance of good conservation practices. To maintain the vital productivity of our farms we must be vigil in keeping our soil and water recources in the best condition that we can. I want to urge you to help us by supporting the Iowa Nutrient Reduction Strataegy as well as other state cost- share programs . Without these programs some of the conservation measures needed would be to costly for any one farmer to shoulder alone. Please adequately fund these conservation programs to help maintain a good recourse for funds to provide good conservation projects in our great state. On our farm for example we seeded a rye cover crop on the acres that were harvested as silage last fall. That cover was well established going into winter and should protect the soil from any erosion next spring before the next crop can be seeded. That is just one example of good conservation practices we try to use on our farm . Thank you for your support.  
Doug Lansink

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #567.

Timestamp 1/11/2013 5:23 PM

**Name** Douglas Beckman

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

wish to encourage you to adapt the Iowa nutrient reduction strategy as proposed by idals, dnr and isu.

Science based voluntary conservation practices work. I use contours Douglas Beckman

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #568.

Timestamp 1/11/2013 5:39 PM

**Name** Betty Cruze

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I'm writing to express my views concerning the Iowa Nutrient Reduction Strategy.

I support the strategy of science-based nutrient reduction that recognizes the importance of voluntary conservation practices.

We need to fund this strategy along with conservation cost-sharing programs.

We have a small farm and do what we can to conserve our soil and water. Betty Cruze

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #569.

Timestamp 1/11/2013 5:40 PM

**Name** Douglas Beckman

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

.I wish to encourage you to adapt the Iowa nutrient reduction strategy proposed by idals, dnr and isu. Voluntary conservation practices based on science work. I use contours,terraces,grass waterways, and notill. Sometimes practices require funding help get practices in place. Please fund this project adequately. Douglas Beckman



**Name** Courtney P. Allen**City** Panora**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

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**COMMENTS**

There has been a quiet revolution in Iowa agriculture that started about 1995 and an explosion of large waterfowl that began about 1990. The revolution concerned the farmers changing from a practice as old as the state of Iowa, using the moldboard or chisel plow, to not using that plow at all. I believe that the revolution is just about complete. The explosion of resident Giant Canadian geese is equally amazing and potentially very damaging to the efforts of the Nutrient Strategy of lowering P and N. My comments concern those obvious facts.

It was gratifying to read in Table 2 (pg. 6) that no-till farming reduced P by 90% (17) and that chisel versus moldboard was 33 (49). Since P is associated with silt, and thus siltation, suggests that no-till reduces siltation by 90% (17) as well. I would expect that the Strategy group would mention the fact that our Iowa farmers have changed their method of farming over a period of time equal to the time it took to get farmers to use hybrid corn. Neither of these revolutionary changes was brought on by government regulations, only the farmer's interest in profits. Our experience at Lake Panorama when measuring nitrates, fecal bacteria and turbidity in the summer months of 2000-2003 was that N increased with turbidity and thus was apparently highly correlated, leading one to assume that like the P, much of the N was surface-related rather than perhaps from tiled water. This is suggestive that Table 1 should have a moldboard vs. no-till source study report by going back and reexamining the P data of the comparison.

As livestock production is moved to more confinement and less pasture, the fecal materials are better controlled and carefully utilized. The reduced pressure on the land formerly used as pasture, such as woodland and marsh, allowed other animals to use the grasses and multiply in numbers. The ones that probably impact the Nutrient Strategy are the waterfowl because they live and survive on the waterways of Iowa. The species that has literally exploded is the Giant Canadian Goose on many, if not all, of Iowa's waterways.

An interesting article appeared in the Ohio newspaper "The Plain Dealer" titled "Goose droppings might be raising bacterial levels in Northeast Ohio waterways" which was first printed in March 23, 2009 and updated in June 25, 2010. Fecal material has bacteria, and also P & N. The scientist studying this problem found that a Canadian Goose will defecate 10 times a day and excrete about a pound a day. On the Middle Raccoon River in 1990, the goose was sporadically spotted and probably was migrating. Hard to tell a migrating bird from a residential one in the spring and fall but the winter-only residents remain. I can believe that we have 25,000 residential geese on the Middle Raccoon from Carroll to Des Moines in January 2013 and could become 50,000 by the winter of 2014. If these numbers are correct, the geese this past year deposited over 9 million pound in or near the source of Des Moines drinking water. Next year it will be 18 million pounds needing 456 loaded tractor-trailers to move the load. This is a huge source of bacteria, and P and N.

Courtney P. Allen

One of the first trustees of the Panorama Rural Improvement Zone

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #571.

Timestamp 1/11/2013 5:47 PM

**Name** Eudene Lund

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please support the funding of the IDALS and DNR conservation program it will benefit everyone Eudene Lund

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #572.

Timestamp 1/11/2013 5:55 PM

**Name** Leon Vanden Bosch

**City** Rock Valley

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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There cannot be one size fits all. We use precision ag with everything we do, variable rate planting and fertilizer, automatic shutoffs with sprayer. We also only put on what we need with the use of Elevate, a program that shows what you need for every input you put on your ground. We use one pass tillage to leave as much residue on the ground to prevent erosion and to prevent fertilizer and chemicals from getting in the ground water. Something nobody talks about is the removal of bean stubble and corn stalks from your ground, there is a noticeable difference on how much water runs off the ground with a hard rain. To implement a standard rate of fertilizer with all type's of soil would be detrimental to trying to feed the world in which we live in, there is a major difference in the yeilds that are produced from 1 mile to the next. Farmers spend a lot of money and time to be good stewards of the land. One last thing regulations cost the government a lot of money and land up having very little value in what they are trying to accomplish. Thanks Leon

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #573.

Timestamp 1/11/2013 6:33 PM

**Name** Carl Palmquist

**City** Lawton

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I am a former Soil and Water District Commissioner very familiar with the PL 534 Little Sioux (and several other watershed projects) that have lost their luster with each turnover of "conservation administrative priorities". The 1940's agency staff advocated, designed, and provided assistance to introduce educate landowners and the general public to land based conservation improvements! Today's agency staff has not kept pace with the technological advancements utilized in current Iowa agricultural activities.

Controlled water management is the key to environmentally sound soil AND water utilization on every Iowa acre. Recent advancements in LIDAR x.y. and z position information coupled with software analysis greatly improves major project planning efforts. The potential alternatives generated make sense as they comparable projects are visually presented to select the most appropriate land improvement project retaining Iowa's major resource.

Agren in Carol, Iowa for topographic planning change proposals and Agrem in Anchor, Illinois for subsurface water management proposals are two examples of private firms that developed speedy but widely adaptable conservation planning tools. The experienced technician (public or private contractor) and modern technology can provide uniform cost projections serving both Iowa landowners and cost share agencies. Land improvement cost contrasts between adjacent districts within the same watershed will become transparent.

Most Iowa farm operators use recently developed technology to improve their level of productivity, precision, and reliability for many routine tasks. The nutrient and water standards Iowa farmers will be accountable to and the tools that advisory and/or regulatory agency staff require uniform evaluation standards. Current agency utilization of modern technology is outdated and inferior.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #574.

Timestamp 1/11/2013 7:00 PM

Name Sarah Black

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Our family has been practicing ridge till , no till, for 32 years this spring. We recycle oil, we have switch grass buffers along our dredge ditches. We compost animal,yard and house waste. We recycle about 95% of all metal, glass, aluminum and plastic that we use in our farm operation and our home.

As conservationists, we are in support of a science-based nutrient reduction strategy. We ask that you fund this strategy and other conservation cost share programs adequately so these programs can move forward.

We will continue to monitor our land and eliminate or reduce nutrient runoff by implementing conservation practices.

Thank you for funding a science based nutrient reduction strategy. Sarah Black

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #575.

Timestamp 1/11/2013 7:35 PM

**Name** Anthony Janssen

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Soil erosion control and water quality are very important on my farm. This is why I have switched to strip-till and deep banding fertilizer as a way to preserve both soil and water quality.

I would ask that any changes made to Nutrient Reduction Strategy be based on scientific proof and voluntarily implemented as needed. A one-size-fits-all regulation doesn't work as every farm is different in its needs.

Please fund these programs as they are necessary to preserve our land and water and keep unnecessary regulations from happening.

Anthony Janssen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #576.

Timestamp 1/11/2013 7:41 PM

Name Barb Schomaker

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

Please support the nutrient reduction strategy. This science-based state nutrient reduction strategy recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

As a farmer, I don't want prescribed regulation from EPA. Myself we have been no tilling for many years now. By no tilling, it not only holds the moisture longer but it keeps the dirt from blowing and washing plus it increases your organic matter over time. Conservation measures that work on some one else's farm may not even be necessary on my farm.

Farmers have proven that we are willing and able to do more voluntary conservation work if funding and sensible state and federal programs are available. Increased conservation funding will improve water quality, trim nutrient loss and reduce erosion, but we will need additional resources and a realistic timeframe to implement effective, targeted strategies in the future.

I am urging you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. Barb Schomaker

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #577.

Timestamp 1/11/2013 7:42 PM

**Name** Joy Reinert

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Farmers are very concerned and are conscious of the need for conservation practices. But we want those practices to be based on sound scientific-based strategies that support nutrient reduction practices. And we want them to be voluntary programs.

Please remember to adequately fund these nutrient reduction strategy programs. Lack of cost-share funding in the past has resulted in delays in conservation measures.

Everyone benefits from funded voluntary scientific-based conservation practices that benefit our farms and the environment. Joy Reinert



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #578.

Timestamp 1/11/2013 7:53 PM

**Name** Dustin Johnson

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I believe it is a huge win for Iowa and for Agriculture when the EPA LIKES something that we are doing. The Nutrient Reduction Strategy is a huge win for everyone and the Legislature would be foolish not to support it.

Farmers across the state participate in voluntary and self funded conservation practices every day and every year. But there is more that can be done. Some of these projects are very costly and cost sharing helps to make sure the project is done correctly and utilizes planning resources from the NRCS. Essentially helping plan and size structures and find best practices.

I hope that you will find a way to help fund the Strategy. Thank you for your time and service. Dustin Johnson

**Name** Russell Doorenbos**City** Boyden**State** Iowa**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

My response is driven by the phrase - "The goal is difficult, but achievable."  
"• No silver bullets; few, if any, win-win solutions."

I am following my Grandfather Vander Haar's vision of nutrient conservation and soil preservation that he practiced on his SW Minnesota farm. My Vander Haar cousins talk about his farm operation using a term "he wasn't much of a farmer". The same ugly term was used about my farm operation after my mother, a Vander Haar daughter, required the assistance of a legal representative. The lawyer and farm manager came over to our farm on two hours advanced notice and informed my wife and I that we may have to move, based on the information they had been given. After we opened up our books and talked about the tile problems that I could not solve as a tenant for the family trust, we were given permission to stay for one year, and only under the auspices of a farm manager. This year is 27 years since that day, and I confess that I have not been able to match the productive maximum that my immediate neighbors describe.

The success that I do enjoy includes mellow soil, less fertilizer, less pest control, and less herbicide cost.

To accomplish my production strategy, I engaged a soil quality consultant, beginning in 1977. I have used deep fall tillage, a small amount of conventional fertilizer as sidedress w/planter followed by the majority as sidedress w/cultivator application. Other ideas that I have tried but did not have immediate positive responses include: biological amendments, micronutrient packages, foliar sprays and discrete herbicide applications. These strategies have taken place in various combinations, not all at once. I wish that I could report that any idea worked well.

Initially, the hoop-house manure was very responsive in the block treatments that I laid out. After a couple of years, we discontinued the block treatments and spread it one area. Something has changed in the 15 years since we began to buy this dry manure; since there is a limited manure volume; the dry manure is applied to less than the field size. The last few years the yield monitor found less yield wherever the hoop-house manure was applied.

To complicate my management decisions, my STP values have always been in VH/H range and yet the corn leaves have yellow streaks which indicate a phosphorus deficiency in the plant. I have tried various treatments to increase the mobility of the soil phosphorus, with no success.

So, where am I at today? I feel disappointed because I could not wrap my decisions and research projects into a package that allowed me to match my neighbor's 'production success'. My neighbors are 'income' and 'yield' maximizers, hence, I have earned the reputation "he is not much of a farmer", which is a function of my failures to match their successes.

Back to the beginning phrase, I wonder, if the win-win box is very small, then, how many producers will be classified in the lose-lose box? Furthermore, I struggle to understand where the money to pay for the \$20,000 farm ground in my neighborhood, will come from in the future, before counting the extra cost for nutrient reduction, unless there is serious inflation. This initiative sounds great, but I believe the success of it will come with great anguish and pain.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #580.

Timestamp 1/11/2013 8:09 PM

**Name** Ray Dittmer

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing to voice my support of a science-based state nutrient reduction strategy. Iowa State University has done research specific to Iowa soils and conditions that would best conserve our resources. With this valuable information, farmers will voluntarily implement these practices. The land owners have the most at stake to protect their resources.

Please support these conservation efforts by providing adequate funding for these cost-share programs. Farmers, like other businesses, are willing to invest in their operation but they need some consistency in funding conservation efforts.

On our farm we practice minimum tillage, keep highly erodible fields in grass, rotate crops and dam up ditches to slow the water runoff. With adequate funding I would like to add more terraces to our property. Ray Dittmer

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #581.

Timestamp 1/11/2013 8:10 PM

**Name** Brent Renner

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing to express my support of the nutrient reduction strategy. Its important that our state remain a leader in science based efforts to improve our water quality. Please fund this program adequately so farmers like myself can continue to add filter strips, build terraces, and improve wetlands. Voluntary conservation projects like these are the best way to show we can maintain agriculture production and improve the environment we live in. Brent Renner

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #582.

Timestamp 1/11/2013 8:10 PM

Name Terence Murray

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. I also feel that we have passed up a great opportunity to find the true amount that agricultural practice can contribute to the reduction of nutrients to the watershed. When will we again see such a small amount of runoff from ag land for the entire mississippi river watershed again. If it is one of the next two years, we should be ready to study and document that event.

I would like to urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. The public and most farmers have shown support of the funding of these programs.

I have in the past participated in cost share programs for terraces and waterways on my own farm. I am very open to projects and practices that will keep fertilizer and soil on my own land where it can maintain my current productivity for years to come.

Some of the practices I use on my farm is planting soybeans in 15 inch rows because they canopy the soil much earlier than 30 inch rows protecting the soil from raindrop impact erosion. We also plant crosswise to side hills as much as possible to hold as much water as possible in the implement tracks. We minimum till corn into soybean stubble leaving residue undisturbed over winter to protect the soil in spring snow melt. Deep tillage is done only after corn when there is adequate residue to protect the soil.

These are only some of the practices we have adopted voluntarily because we feel they are the right thing to do to protect our farm while maintaining superior agricultural productivity.

I intend to put in filter strips along the two creeks that pass through my land when I finish repairing and stabilizing the banks as well as removing fallen trees and soil from the creeks that block and divert flow in the stream.

Voluntary programs are working. We need some time and patience as well money to get things done during the small windows of time when it's right to do things like reshaping and reseeding waterways for example.

Thank you for reading my letter. Terence Murray

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #583.

Timestamp 1/11/2013 8:38 PM

Name Andy Hinnah

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

The strategy is a science and technology based approach developed by the Iowa Department of Agriculture and Land Stewardship (IDALS), the Iowa Department of Natural Resources (DNR), and Iowa State University (ISU) to encourage the adoption of voluntary conservation practices that will have the greatest benefit for water quality in the state. It uses ISU research to determine which practices are most effective when applied to Iowa's unique landscapes. The strategy outlines these efforts in a scientific, reasonable and cost-effective manner, an approach supported by Farm Bureau members.

Some groups and individuals are already saying the Iowa Nutrient Reduction Strategy won't work. They believe voluntary conservation practices on farms do very little to protect water. They're calling for more regulation of farms, similar to the costly one-size-fits-all regulations imposed on farmers in the Chesapeake Bay area.

Farmers know better! They want to continue to be part of the solution, but they know that new regulations aren't the answer. Andy Hinnah

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #584.

Timestamp 1/11/2013 8:39 PM

**Name** Craig Recker

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Farmers are good stewards of the land especially with a little incentive from the state to help fund some of the conservation projects. I believe we could make a real difference voluntarily. I live in the Hewitt Creek water shed, which is a voluntary program that has made a real difference proven by results. Craig Recker

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #585.

Timestamp 1/11/2013 9:02 PM

**Name** George Baitinger

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I want to request your support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

Because of the concern regarding the potential for Iowa Water to impact the Gulf, I think we need to proactively implement practices that are both effective and economically viable, and that will not happen if we fail to act and adequately fund the Iowa nutrient reduction strategy. Further regulation of farms, similar to the costly one-size-fits-all regulations imposed on farmers in the Chesapeake Bay area, are not an acceptable alternative to those of us involved with production agriculture.

Thank you for your consideration of this very important request. George Baitinger



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #586.

Timestamp 1/11/2013 9:20 PM

**Name** Nick Larson

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I believe farmers want to maintain good water quality. They want the nutrients applied to their fields to stay there and benefit the crops. I also believe with the support of IDALS, DNR and research by ISU together in a scientific approach to making improvements is the best way to go. Cost-share programs along with farmers efforts will benefit the environment. Nick Larson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #587.

Timestamp 1/11/2013 9:42 PM

**Name** Ken Lane

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would like to take a minute to express support for the Nutrient Reduction Strategy. I feel it is important that lawmakers fund the Nutrient Reduction Strategy as well as other conservation cost-share programs. I feel that if we all work together we can achieve the goals that everyone wants to achieve. Ken Lane

**Name** Tim Recker**City****State****Providing comment on the following sections:****Executive Summary****Nonpoint Source****Policy****Point Source**

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Secretary of Agriculture Northey,

The Land Improvement Contractors of Iowa applaud the efforts of the Nutrient Strategy committee. The Iowa LICA is a group of 400 contractors that put conservation programs and practices in place on Iowa's fertile landscape.

Iowa is the leader in food, fiber and fuel production. Iowa farmers and LICA contractors work together every day to implement conservation practices on Iowa's working ground. If Iowa wants to be leader in conservation, they need to invest in technology similar to how agriculture has invested in technology. This investment in conservation technology needs to accomplish two things; first it must allow a faster delivery of conservation plans and design. Farmers do not want to wait months for a design specification. Secondly, conservation technology needs to simplify the process in order to engage the private sector in conservation planning. We need software that the private sector can implement in days instead of months or years.

The nutrient strategy calls for increasing the delivery of conservation and nonpoint source programs in a straightforward and flexible manner. Iowa farmers and contractors understand practices available for nutrient reduction but lack technical support for non cost share programs. Fortunately, we have a home grown company that is on the cutting edge of conservation technology. Agren, located in Carroll, Iowa has been developing software for the last 6 years that speeds up and simplifies the process of conservation planning and design. What now takes hours and days to design can be done in minutes, and is simple enough to attract private businesses to begin providing services.

The Iowa Land Improvement Contractors Association has reviewed Agren's tools and support this technology. It is cutting edge technology that would speed delivery of conservation services and get more conservation practices implemented.

Currently government offices cannot keep pace with requests for conservation practices. Every day Iowa LICA members receive requests from Iowa farmers to build waterways, before having a proper design. Farmers are not willing to wait months or years for those designs. With this new software waterways can be developed in minutes. Along with the traditional paper designs for waterways, the Agren software can provide an electronic file that contractors can load in to their blade control systems and build waterways with very little additional assistance.

Putting new technology in the hands of existing staff is far more cost effective and efficient than hiring new staff. The combined agencies of IDALS, IDNR, and NRCS need to take advantage of Agren's software development by forging a public-private partnership with Agren to develop a full suite of conservation planning tools that will increase the rate of delivery and allow the private sector to offer conservation services. Tim Recker

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #589.

Timestamp 1/12/2013 7:06 AM

**Name** Scott Heater

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

Soil conservation and nutrient reduction have been a major program at our farm for the last 20 years. As you drive by our home on Highway 61 just 4 miles south of Wapello, you can see that we take conservation practice seriously. We have planted over 10,000 trees to control soil erosion and have removed tiling that allowed direct drainage into the county drainage ditch that flows directly into the Iowa River just 1 mile from our home. These programs are all voluntary programs that we implemented working with our local NRCS and DNR offices. I feel very strongly that a voluntary program can and does work. The hardest part of this program will be educating farmers the value that these programs bring to their land. Scott Heater

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #590.

Timestamp 1/12/2013 7:31 AM

**Name** Brad Jesse

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

The best way to have better nutrient reduction is to offer voluntary conservation practices.

Agriculture needs to maintain current production level here in the U.S. and doesn't need to be strapped with regulations that are not voluntary and science-based.

Farmer will do these voluntary practices if offered. I have many buffer strips on my land to filter out nutrients that may be running off with rain water.

Again support voluntary conservation practices. Brad Jesse

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #591.

Timestamp 1/12/2013 7:40 AM

**Name** Randolph Kernen

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I encourage you to adopt a voluntary science based nutrient reduction strategy. Best practices vary from farm to farm and a one size fits all policy will not work.

Funding for these policies is key to their success. If not funded these policies just will not accomplish their goals. Randolph Kernen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #592.

Timestamp 1/12/2013 7:42 AM

**Name** Terry Naig

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I strongly urge you to provide funding for the nutrient reduction plan that the state of Iowa is proposing. By adequately funding the Iowa Nutrient Reduction Strategy and the related conservation programs and projects, Iowans will be able to voluntarily begin to reduce nutrient discharge rather than to be forced into practices not supported by science. Farmers are the first to be blamed for nutrient discharge when in fact many sources are involved. This plan is a great place to start but funding is critical. Terry Naig

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #593.

Timestamp 1/12/2013 7:44 AM

**Name** Carl Palmquist

**City** Lawton

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Last evening I submitted submitted my first comment. I realize that today is several hours beyond your designated extended response period, but reflective thought usually magnifies or at least focuses more clearly any proposal. Please consider these thoughts as well.

Each level of the "AGENCIES" and the wide range of education and/or training of their respective staff at the farm owner and/or operator contact zone fail to recognize their dialect and/or images have built in biases. This is not the place to amplify my personal experiences, but soil and water proposals that involve major land owner and/or agency recognition and financial support are most often proposed by the entry level NRCS technician. The many alternative design considerations and their relative cost/benefit ratio available with the Agren software ability to quickly consider those alternatives and the way each proposed project fits with both the watershed and individual cooperator conservation plan is a WIN-WIN situation. The parameters however need to be authorized by each agency and recognized by all AGENCIES!

Respectfully submitted after a long night of study and reflection.

Carl Palmquist



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #594.

Timestamp 1/12/2013 7:56 AM

**Name** Kurt Moffitt

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

The Department of Agriculture and Land Stewardship, the Iowa Department of Natural Resources, and Iowa State University have developed a Nutrient Reduction Strategy for the state of Iowa. This voluntary strategy is scientific, reasonable and cost-effective. I encourage your support of the funding needed to put the strategy in place. Implementing this plan on a voluntary basis will save Iowa farmers from increased regulations and mandates, and yet will improve and benefit for water quality in the state. Kurt Moffitt

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #595.

Timestamp 1/12/2013 8:16 AM

Name Joe Dierickx

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing to ask for your support of the Nutrient Reduction Strategy that the Secretary of Agriculture and many other interested parties have worked on and proposed. It is a well thought out well written document that should reduce nutrients going in our bodies of water and is science based in regards to the strategies it outlines for stakeholders to do.

As with any program, it needs to be funded properly so it can be effectively implemented. There are conservation cost share programs that will also help with nutrients flowing to our streams and rivers that need adequate funding. Use the unspent balance to help bridge this gap.

I put in grass strips and waterways to slow the flow of water off of my fields. I also do as much no-till farming as I can each year to build up the carbon in my soil which makes it more productive.

Please support this voluntary, science based approach to nutrient management. Joe Dierickx

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #596.

Timestamp 1/12/2013 8:29 AM

Name Randy Beichley

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I ask your support for voluntary science-based nutrient reduction strategy. Maintaining agricultural production is vital to Iowa's economic health. Voluntary conservation practices are important and need your support. I am likely to embrace a voluntary, science-based strategy, rather than being mandated certain practices.

Funding for the Iowa Nutrient Reduction Strategy and other conservation cost-share programs is extremely important. I recently heard that Iowa's lakes still show signs of sediment/run-off, despite current conservation practices. Our state's failure to adequately fund conservation cost-share programs may have contributed to this problem.

I personally no-till my row crop acres and see many benefits, including decreased water and soil-runoff. My father installed terraces that have been farmed for over 40 years, however improvements to those terraces are necessary, and would better serve my operation and the environment if upgraded. Adequately funding conservation cost-share programs will help facilitate these improvements and other conservation projects being implemented.

Continued soil testing will ensure proper nutrients are being applied. I raise hogs and apply manure and inject the lagoon effluent. I want to continue to raise crops and livestock and ask that you support science-based nutrient reduction strategy to keep my farm and Iowa's environment at its best. Randy Beichley

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #597.

Timestamp 1/12/2013 8:41 AM

**Name** Carol Raasch

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am writing in support of the VOLUNTARY program advanced by Governor Branstad that calls for a scientifically based nutrient reduction strategy. Iowans and, more specifically, the farmers who have tilled the soils of Iowa know what needs to be done to conserve their most valuable input - the land. We have constructed terraces, gone to minimal or no tillage, and grown buffers and waterways to implement best usage of our water supply, the chemicals we purchase, and to preserve the soil. I petition you to fight for the funding needed for this voluntary program so that we can CONTINUE to be working toward a solution that is in all our best interests. Thank you. Carol Raasch

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #598.

Timestamp 1/12/2013 9:07 AM

Name Ann Bushman

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Agriculture production is important to everyone, whether they are farmers or not. It is important because it feeds the people of the United States, as well as those over seas, and in using good conservation practices, it helps maintain the soils nutrients and ability to produce good food. Therefore, I recognize the importance of individuals voluntary conservation practices and support a science-based state nutrient reductino strategy.

Projects such as the Nutrient Reduction Strategy and other conservation cost-share programs need to be adequately fund and I would urge you to support this. It is these kinds of projects that allow you the opportunity to go home at night and have a healthy and wholesome meal to consume each and every day. Without such programs, our farmlands could become wastelands. It is important that we unstand how to take care of the land we work.

There are the simple projects of consumers composting waste to raising their own red worms to help turn over soil, to larger practices of CPR set aside to terracing and grass water ways. As new chemicals are brought to the market for raising produce, we are not always certain to the effect they will have on the land or the water. Funding programs like the Nutrient Reduction Strategy will enable us to have a better understanding and allow us to make better decisions about our environment and how to handle them in the future. Ann Bushman

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #599.

Timestamp 1/12/2013 9:37 AM

**Name** Keith Meitner

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I support voluntary conservation practices that are based on a sound science based nutrient reduction program.

We need to fund our states conservation programs to the fullest amount possible so that we can continue to keep our waters clean.

I have several grass waterways on my farm and I use no-till and strip-till practices in my farming operation.

Thank you for taking this important matter under consideration. Keith Meitner

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #600.

Timestamp 1/12/2013 10:03

Name Judy DeBord

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Iowa's farmers have a history of caring for the land and working together to solve problems to conserve and protect that land and the environment.

The Nutrient Reduction Strategy is key to keeping Iowa a national leader in conservation. The strategy is a science and technology based approach developed to encourage the adoption of voluntary conservation practices that will have the greatest benefit for water quality in the state, as well as down stream. It uses ISU research to determine which practices are most effective when applied to Iowa's unique landscapes.

I support a scientific, reasonable, and cost effective approach that allows farmers to make voluntary decisions and use of a combination of practices that will work best in our own individual area, instead of "standard" regulations that only work for some.

I ask state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

It is going to take all of us to make an impact and farmers want to continue to be part of the solution, because it is in our own best interest to implement practices that benefit our farms.

Please renew your effort to move forward together to better protect the water and land by funding the Nutrient Reduction Strategy approach, as well as, other programs that protect our land and environment in a reasonable way and encourages ag production. Judy DeBord

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #601.

Timestamp 1/12/2013 10:15

**Name** John Looney

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**  **Nonpoint Source**  
 **Policy**  **Point Source**

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Secretary of Agriculture Northey,

I am writing in support of a science-based state nutrient reduction plan that would be centered around voluntary practices with regards to maintain ag production in our state.

This can only be accomplished by funding Iowa Nutrient Reduction and other cost share programs.

On our operation we use contour farming, waterways, field borders, no-till, and filter strips along streams. These practices have helped tremendously in controlling nutrient run-off into our local streams and it is voluntary practices like these that will help Iowa lead the way for responsible nutrient reduction. John Looney



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #602.

Timestamp 1/12/2013 10:36

Name Elwood Johnsonjr

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support the science-based state nutrient reduction strategy. It is the result of a number of agencies ,DNR, ISU and others to cover all bases so it will be well thought out and workable.

It needs to be fully funded,The Nutrient Reduction Strategy, so we can stay ahead of the Federal way of doing things that are not science based or efficent and elimanates most local input.

Contrary to a lot of loud voices that say farmers do not care, I have 50 years of memory that goes back to when we plowed every thing because we did not have planters and cultivators that could operate in a lot of ground cover. There used to be dust storms in the Spring. In the Winter the snow would be black with the blown dirt.

That does not happen any more except in very extreme conditions. Farmers care for their soil because that topsoil is valuable to the farmers to make a living. We would not have 200bu corn per acre if we did not have good topsoil to grow in and the farmers know that and want to know better and efficent ways to farm to even get better yields

We put in a water way on our farm back in the 60's and it has been well maintained since. Farmers do care a lot. Elwood Johnsonjr

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #603.

Timestamp 1/12/2013 10:46

**Name** Steve Swenka

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

Please support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. Steve Swenka

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #604.

Timestamp 1/12/2013 11:05

Name Richard Schafer

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

The science based strategies to exercise conservation and clean water and air practices are good.

My concern is implementation. Those of us who subscribe to conservation will naturally employ new beneficial practices. Our farm employs no-till, strip till and buffer strips and is enrolled in CSP.

I have neighbors who have never conformed to their farm program based tillage agreements and have not been penalized.

I believe the answer to more acres in conservation practice is education based in FFA, community and state college ag curriculums and extension activities.

Education is key for increased voluntary participation. Richard Schafer

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #605.

Timestamp 1/12/2013 11:14

**Name** Leora Bandstra

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

My family and I are asking for your support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. We beg of you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. We cannot afford to delay needed conservation projects as we have in the past. On our farm we practice no till, edge of field buffers to protect our streams. We use soil samples so that only the needed nutrients are applied to our fields. We use GPS systems so that only the chemicals needed are applied and so there is no double coverage. We only apply N when soil is 50 degrees or cooling. We want the best for our country and will continue to upgrade needed systems. However, this is costly and so a good crop is needed to continue to grow in the direction needed. So please, once again, we need your support. Thank you for our time. Leora Bandstra

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #606.

Timestamp 1/12/2013 11:17

Name Landi McFarland

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

My family supports a science-based approach to encouraging voluntary conservation practices in Iowa. We feel these will have the greatest benefit to water quality in our state. This approach has been developed by the Iowa Department of Agriculture and Land Stewardship, Iowa Department of Natural Resources, and Iowa State University, and we think it is a far superior solution to one-size-fits-all regulations.

My family has been living off the land in Union county for 157 years, and we want to leave our land in better shape for the next generation of our family. We take part in voluntary conservation practices. We have taken part in cost-share programs in the past, and hope to continue to do so if lawmakers adequately fund the Iowa Nutrient Reduction Strategy and other conservation cost-share programs.

Farmers care about our land and water resources - after all, we are active environmentalists, not environmental activists! Please help support the Iowa Nutrient Reduction Strategy. Landi McFarland

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #607.

Timestamp 1/12/2013 11:43

**Name** Jerry Book

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I would like you to support state nutrient reduction strategy. Keep it voluntary. Remember each farm is different and the operator needs the flexibility to tailor the conservation practices to fit that farm.

Please make sure funding is there to help.

Our farm is a pasture farm, so we keep it that way with cows and hay production, no row crop. Jerry Book

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #608.

Timestamp 1/12/2013 11:46

Name Marcus Urelius

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I understand the need to reduce the nitrate and phosphorus runoff in the Mississippi river basin. However, I strongly believe that each farmers situation relating to nutrient conservation is different. Thus, any one size fits all practice imposed by the EPA would very likely be burdensome and inefficient.

Each tract of farmland is unique. We need to know that state funding will be available for us to enact the practices best suited to meet the common goal. I believe reaserch on ways to lighten the environmental footprint of production agriculture while maintaining production is also critical. Thus conservation and reserch programs should be properly funded if we are to avoid a federal takeover.

On my farm we employ buffer strips aroud drainage ditches and terraces to limit runoff into the river system, as well as CRP ground. Fall tillage is also limited to discing stalks, to leave a high residue ground cover through winter. N and P application is done in the spring ahead of the planter to eliminate winter runoff with the snowmelt. In the future I would like to move to summer side dress application to further reduce the time for the nutrients to leach out before used by plants.

I am willing to look at new conservation practices if they are proven effective by science. If a way can be found to meet the worlds food and energy needs, and reduce environmental impact, farmers will listen. Marcus Urelius

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #609.

Timestamp 1/12/2013 11:54

**Name** Lance Schiele

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

With EPA's every growing presence in this country it is important that lowans have a way to prove we are doing the right things. Water is important to all of us. I myself am a livestock feeder. I try to go above and beyond the laws and rules to look good for my neighbors. Please fund the Iowa Nutrient Reduction Strategy. Lance Schiele



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #610.

Timestamp 1/12/2013 12:31

**Name** Jerry Schoenthal

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

As I support less government run programs and more voluntary practices . I would strongly recommend that the state of Iowa adequately fund the nutrient reduction strategy .

Iowa farmers understand what needs to be done on their own farms to implement conservation practices to maintain agricultural production .

Cost - Share programs such as waterways,terraces,retention ponds,and set-a-side acres will need to be continued to make the nutrient reduction strategy program to work properly. Jerry Schoenthal

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #611.

Timestamp 1/12/2013 2:11 PM

**Name** Dallas Johnston

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I want to send a short note asking for your support of a science-based state nutrient reduction strategy. We need to use voluntary conservation practices. These programs need to be funded in order for them to be effective. I have been spending a lot of money the last few years trying to reduce erosion and improve water quality. These practices cost an incredible amount of money to implement and is not something that needs forced on us in agriculture. Helping with the cost is going to make it happen a lot faster than anything. Thanks for your continued support for those of us in production agriculture. Dallas Johnston

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #612.

Timestamp 1/12/2013 2:38 PM

**Name** Brian Klocke

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I feel the Iowa nutrient Reduction strategy is a very effective and cost efficient way of controlling excess nutrient from getting in our water sources. Why add more cost to a simple solution as a voluntary program that is being taught to farmers by IDALS and state universities. Brian Klocke

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #613.

Timestamp 1/12/2013 3:55 PM

**Name** Kevin Kelly

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

Greetings,

With the high crop prices and more land being taken out of the CRP and other programs that help to keep nutrients out of our water this is going to be a tricky problem.

I would like to see a 150 ft buffer along every stream in Iowa that would be planted to trees, grass or hay to help keep this runoff water out of our streams, but it sure is not the whole answer to the situation.

Is there a way to stop all nutrients from reaching surface water--probably not except for turning Iowa back into a grassland and I and you know that will not happen.

I think the best thing we can do is some studies of ways different ways to test if or what is possible.

Thank You

Kevin Kelly Kevin Kelly

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #614.

Timestamp 1/12/2013 6:15 PM

**Name** Chris Wynia

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I was to express my support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge you as a state lawmaker to adequately fund the Iowa Nutrient Reduction Strategy as well as the states other conservation cost-share programs. I believe Iowa's failure to adequately fund these programs in the past has delayed conservation projects.

I am already using a soil conservative practice as well as a manure management plan. These both benefit the state of Iowa. Chris Wynia

**Name** Alex Cahill**City** Davenport**State** Iowa**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

I would like to thank you for the opportunity to make comments to the Iowa Nutrient Reduction Strategy.

While the proposal begins to address the troubling problem of excessive nutrient runoff from Iowa's streets, farms, and sewage plants, it does not go nearly far enough to ensure the state's waters are safe enough for future use. Of particular concern is the lack of a firm requirement in this strategy as to how much nutrient runoff will be reduced through the course of the life of the proposal. Without firm limits on how much nutrient can be discharged into the state's waterways from point and non-point sources of runoff, there is effectively no way meaningful reductions in nitrogen and phosphorous runoff will be achieved.

The strategy focuses on increasing voluntary efforts among farmers to plant buffer strips and utilize more effective methods to keep rainwater from departing the soil. Further, the strategy assumes that simply through education and discussion farmers will voluntarily implement the varied strategies identified throughout the paper to mitigate runoff. However, such a concept of purely voluntary efforts through education and outreach will undoubtedly fail. For instance, the high price of corn and soybeans by no means will provide an impetus for farmers to increase the amount of land set aside for grasses or native plants. Instead, high market prices impel farmers to ensure that every available piece of land is utilized in order to maximize their gain. The pollution runoff is by no means all the fault of farmers as the market and education do indeed play a crucial role. But for the report to believe that at a time when farmers are increasingly tilling up native prairie and other vital ecosystems needed to mitigate pollution, that farmers will somehow voluntarily comply with the message and spirit of this report is absurd. Only when a firm limit set by the force of law and regulation will all farmers throughout Iowa be able to compete fairly in the market as well as have firm knowledge as to the guidelines required to improve the state's water.

It should also be noted that the voluntary nature of the report assumes that farmers do indeed have an incentive to utilize effective pollution reduction strategies. However, this assumption is cast into doubt if the authors of this strategy were to consider why such pollution reduction strategies are not already being utilized. Many of the concepts outlined such as buffer strips, crop rotation, setbacks, etc. are not recent developments in agriculture. Indeed, many of these practices have been in use for many years. It would be helpful for the author's of the Nutrient Reduction Strategy to explain to the public why this new strategy is somehow going to change anything, particularly considering that if the beneficial nutrient reduction strategies were indeed so feasible, why would farmers not already be doing them? It stretches the imagination to believe that through a little education and outreach any substantial reduction will occur.

Additionally, the report does not cite nor provide substantial evidence of any past states where voluntary efforts have made any difference in nutrient reduction. It would be useful if the report could provide the public with more information as to why the voluntary efforts outlined in this report would have a high likelihood of success. Instead, as demonstrated through many years since the creation of the EPA and other significant environmental legislation, only when government at all levels takes affirmative action to set meaningful limits to pollution does positive and significant reductions actually occur. The state of Iowa and the authors of the Nutrient Reduction Strategy would do well to heed the lessons of environmental history and mandate a standard and create an enforcement mechanism that will actually curb the tremendous problem of nitrogen and phosphorous pollution.

I would also like to comment on the way by which this report was created. Instead of canvassing the state and having discussions with various constituencies about the best way to solve Iowa's nutrient problem, the Committee instead barely allowed for any voices in the creation of this strategy, except for the present comment period. Such a method is surely not the best way for the state to go about crafting important policy proposals, especially when the proposal seeks to promote education and outreach as a core component of its strategy. The state can surely do better.

In sum, the current approach taken by the Iowa Nutrient Reduction Strategy will not make a substantial dent in the current water pollution. The strategy lacks a coherent method to ensure nutrient pollution is reduced and fails to provide the public with any assurances that the approach taken by the Strategy will actually address this substantial problem. I respectfully request and sincerely hope the Strategy is revised to focus more on the nutrient runoff from agriculture and that the Strategy create an enforceable mechanism and strict limits to solve this problem.

Thank you.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #616.

Timestamp 1/12/2013 8:42 PM

**Name** Todd James

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

We need a science based nutrient strategy plan and one that is not mandatory. It has been proven time and again that farmers will openly support regulations when presented to them this way. I would encourage you to fund all programs to meet these requirements.

Our operation voluntarily uses no-till, variable rate fertilizer prescriptions, contour farming and crop rotations to benefit the environment.

Thank you for time. Todd James

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #617.

Timestamp 1/12/2013 8:46 PM

**Name** Marvin Adolphson

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I believe a voluntary approach to conservation in Iowa is the way to go. We have so many streams and creeks with such a varied landscape that conservation must be tailored to these varied conditions. Therefore we need to fund the conservation programs and let the individual farms provide the conservation practices to the land. Let's keep and fund our current programs. Marvin Adolphson



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #618.

Timestamp 1/12/2013 9:16 PM

**Name** Mike Miller

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I have implemented many conservation practices on my farms. I no till and use terraces on my rolling ground. I have installed waterways where they are needed and have reduced the amount of fertilizer that I use to help protect the enviroment.

The current farm bill requires a conservation plan be followed. Many farmer do not follow their plans. I feel that instead of requesting funding for new programs we need to fund and enforce the programs that we currently have. Mike Miller

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #619.

Timestamp 1/12/2013 11:03

**Name** Chad Vanregenmorter

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am asking for support of a science based approach to nutrient reduction. Another important item to this is that it needs to be a voluntary practice to allow agriculture production.

Lets put common sense and economics to work, let people put there own style of conservation in place to make themselves better producers. And they will put into place what they feel is important and what they can afford themselves. Chad Vanregenmorter

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #620.

Timestamp 1/13/2013 6:28 AM

Name Jeff Reints

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I would ask you to support the Iowa Nutrient Reduction Strategy. this approach is science and technology based and has been developed by IDALS,DNR and Iowa State University. Other groups are calling for more regulation and costly red tape. On our farm we have already implemented many nutrient and conservation practices. We use striptill for our nutrient management of placing fertilizer where the corn crop will utilize it best. Also we use notill planting for soybeans and maintain soil erosion practices like terraces and grassed waterways. What we don't need is another set of ineffective and costly rules and regulations. We as farmers do care about our enviroment and continue to be the best stewards of the land Jeff Reints

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #621.

Timestamp 1/13/2013 9:27 AM

**Name** Lon Tweeten

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

As a farmer and a family that is concerned about making a living, producing crops and livestock to feed the world, and being very concerned with the way we received the land in our generation, and the way we leave the land (preserving the land for future generations and the environment). I believe that we need to base our decisions on nutrient management and conservation methods that are based scientific evidence that come from the University's I don't believe with the changing times that we need to become or listen to activists that are running on here-say and personal gains. Our goal in life is to be an active producer and preserve, yet better the ground for future generations. We want this to be a voluntary act

Thank you for your patients and consideration Lon Tweeten

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #622.

Timestamp 1/13/2013 9:50 AM

Name Louise Van Ersvelde

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Water quality is a very important issue for the State of Iowa. To achieve this goal a scientific and technology approach is the key to provide the best practices, procedures and improvements for best water quality. All producers should be stewards of the land for their future growth and for their next generations.

I continue to support the voluntary conservation practices by the producers that will provide water quality in the state. State funded programs are needed to achieve this goal with their continuous support for the future.

However, conservation programs, funding and education for the farmer is only the beginning in accomplishing the goals. The problem just doesn't lie at the farmers' door step by doing poor conservation practices or livestock production by farmers, the communities and industries along the watershed of our creeks and rivers are in fault, too. (In reference to the ongoing Little Bear Creek Watershed Study for information). The Poweshiek County commissioners consider Little Bear Creek Watershed as a priority watershed both because of its agricultural production and its connection to three Poweshiek towns. However, the funding for this project has been unavailable. Louise Van

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #623.

Timestamp 1/13/2013 11:08

Name David Nolte

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

We need your support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

We need funding for the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

I farm in Muscatine Co., doing so for the past 30+ years. I am using no-till, grass waterways, filter strips, grid sampling/with variable rate fertilizer, and split nitrogen application.

The soil is there to plant/produce a crop, we need to feed/fertilize, maintain pest control, and harvest. For this to happen, farmers will save that very important part of the puzzle-soil. Thank-you for time. David Nolte

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #624.

Timestamp 1/13/2013 11:18

**Name** Adam Hill

**City**

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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With the availability of nutrients differing with a wide range of ph levels, how can a blanket statement of 20ppm for a soil test of Phosphorus be acceptable? (If a soil tests at a ph level of over 8, are we not going to short that ground of available phoshorus at a level of 20ppm of P? (Different ph levels will make for different availability of different nutrients, so a blanket test level of 20ppm of P accross all soil types may be flawed in my opinion.) Thank you. Adam Hill

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #625.

Timestamp 1/13/2013 11:27

**Name** Brad Feckers

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am writing you today to support the science based voluntary nutrient reduction strategy. A good way to implement this is through voluntary conservation practices. Today's farmers are more environmentally conscious than ever before and still able to maintain high productivity on their land.

We need your help to make sure adequate funding is in place to make these programs effective. Sometimes in the past needed conservation projects were delayed because funds weren't available.

We have used many voluntary conservation programs on our acres and plan to use more in the future if cost share is available. We use grassed waterways, creek buffer strips, minimum tillage and best management practices for applying fertilizer. Our biggest project has been installing a grade stabilization structure. This would not have been economically feasible without the cost share.

Please consider these points with your support. Brad Feckers



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #626.

Timestamp 1/13/2013 11:59

Name Steven Lee

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing to urge you to support the Iowa Nutrient Reduction Strategy.

Voluntary science-based conservation plans work to reduce soil and nutrient runoff.

On my farm I use grass waterways, terraces, grass headlands, some contour farming, reduced tillage and on a large share of my acres, no-till. I apply my nitrogen fertilizer in the spring, not fall, and am looking into using cover crops.

I also urge you to fund the Iowa Nutrient Reduction Strategy and fund other conservation cost share plans. Farmers have plans for conservation work, but need help with financing large projects.

Thank You Steven Lee

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #627.

Timestamp 1/13/2013 12:38

**Name** Gregory Alber

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am in support of continuing with cost share programs for conservation and funding of the nutrient reduction strategy. I have used the conservation programs and I know my land is better and more productive now then when I took over the land from the last generation Gregory Alber

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #628.

Timestamp 1/13/2013 12:58

**Name** Dan Elliott

**City** Minden

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Recently heard a presentation about the nutrient reduction strategy. I am glad there has been attempts to use science to arrive at possible solutions. I believe a combination of the strategies farmers can use will help. Most importantly, this needs to be voluntary. Farmers should not be told this is what you have to do. We do not want to have to get a permit to farm. I also believe there is going to have to be some funds given to help farmers implement these strategies.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #629.

Timestamp 1/13/2013 1:05 PM

**Name** James L. Murphy

**City** Runnells

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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We live in an area where people are buying small parcels of land to build beautiful country homes. It is also an area where livestock farming has decreased and the remaining land is being controlled by farmers who are federally subsidized and generally disregard

common sense practices related to soil and water conservation and control of excessive runoff. Five beautiful homes have built nice

ponds downstream from a neighbor who who blatantly disregards soil and water conserving practices. The neighbor closest to the pollution spent thousands last fall to have his large pond dredged and the silt spread out along the banks.

There is no rationale to using public funds to supplement the income of deliberate polluters.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #630.

Timestamp 1/13/2013 2:08 PM

**Name** Joseph Bahe

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

please support the nutrient reduction strategy. we already do alot voluntarily to minimize adverse enviromental impacts on our land Joseph Bahe

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #631.

Timestamp 1/13/2013 2:26 PM

**Name** Donald Christopherson

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would like to take this chance to ask you to fully fund the Iowa Nutrient Reduction Strategy plan. When we work through a science based strategy we get a much more reliable result. Voluntary conservation practice are necessary and are very valuable to the state of Iowa as we try to maintain agricultural production.

Thank you for your time in studying this issue. Donald Christopherson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #632.

Timestamp 1/13/2013 4:11 PM

Name Christopher Ten Napel

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I wanted to write you about the nutrient reduction strategy. As a farmer I believe that this concept can be a huge benefit to Iowa and an example for other states to follow. There is no one out there that knows a farmer's field better than the farmers themselves. I do not believe that mandated practices from someone sitting behind a desk are the answer. With this science-based approach I believe that Iowa can be a leader and an example for many other states to follow in the coming years. I myself have already installed thousands of feet of grass waterways around several waterways in my fields. I did this not because I was made to, but because it is the right thing to do to help the environment. I am also switching to more no-till, to help conserve more soil, and nutrients. I believe with your support and help, Iowa can be a leader in voluntary environmental control. Christopher Ten Napel

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #633.

Timestamp 1/13/2013 4:22 PM

**Name** pat lynch

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

On our family farm conservation means longevity we understand that taking care of land, water and air is vital to our future. Please help us by funding the Nutrient Reduction Strategy its science based format along with current cost share programs and voluntary practices are what we need to continue our long term conservation goals. pat lynch



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #634.

Timestamp 1/13/2013 4:25 PM

**Name** Crystal Krapfl

**City** Ames

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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While I think a strategy that is formed in regard to improving water quality in the state is a great idea, it concerns me how most of the strategy is voluntary. I think the citizens and businesses that are polluting our rivers need to be held more accountable for the astounding damage they are causing. If politicians really want to improve water quality (which I think is vital for the future), they must implement changes that are mandatory, not voluntary. I understand that farming is essential to the economy, but I don't think that should or needs to come at the cost of healthy water. I think this strategy needs to be revised in a way that forces change, not encourages it. So, please revise it so the people polluting our rivers are held accountable and are required to make changes.

Thanks,

Crystal Krapfl

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #635.

Timestamp 1/13/2013 4:47 PM

Name S Vance Hjelm

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am in total support for a science-based state nutrient reduction strategy that will see the importance of voluntary conservation practices, plus still maintain our agricultural production. What I like the most about the Iowa Nutrient Reduction Strategy is that all the stakeholders for both point and non-point source problems are at the table to come up with practical solutions for Iowa's soils and people.

Our family has put into place many conservation practices voluntarily that include taking out above-ground intakes and replacing them with "french drains", using some minimum and no-till practices, replacing a farm pond for livestock watering in the pasture, and installing field tile that helps with absorption of our big-event rainfalls. One of the future practices we are looking at to incorporate in our farming practices may be using cover crops on the highly erodible ground.

I would urge you to fund the Iowa State Nutrient Reduction Strategy fully, along with the state's other conservation cost-share programs. In the past, our failure to adequately fund these programs has delayed many conservation projects. S Vance Hjelm

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #636.

Timestamp 1/13/2013 5:13 PM

**Name** Kate Bason

**City** St. Charles

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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As I read the the nutrient strategy document, I started to think I was reading a Farm Bureau document (and later discovered that this was largely accurate). After a year of subscribing to a Farm Bureau publication, I found their talking points so one-sided and incomplete that I unsubscribed. The nutrient strategy document is, likewise, one-sided and incomplete. A few examples:

-Nutrient rich soils cited as the source - if our soils were that nutrient rich, why add so much fertilizer? Let's be honest.

-Stream scouring mentioned as a source, while defending fall application of anhydrous. Please cite amounts and sources. As it's clear N & P impacts to the streams follow the farming application periods, this statement lacks credibility.

-A cost analysis that fails to include the costs of impaired waters or the benefits of diversified crops.

-No commitment to measurable goals, even including the statement that well-known "nutrient reduction practices" such application timing/rate, buffer strips, erosion controls, etc) are not a recommendation. Why not? These practices are anything but new.

-The focus and suggestion is that voluntary compliance works. It has been shown that common sense, meaningful regulations are necessary to level the playing field. Education and technical assistance have been around for years; voluntary compliance has not worked. Indeed, many more acres have been turned under to grow corn for ethanol, making the outdated erosion numbers cited in the strategy meaningless.

This list of shortcomings is only a few of many.

The nutrient strategy document needs to be pulled back and reworked with water quality experts, including DNR staff, involved through-out the process, particularly the nonpoint portion.

The strategy is incomplete and unlikely to succeed unless inclusive of all stakeholders and unless meaningful, measurable goals, timelines and assessment measures are included.

Thank-you for the opportunity to comment and may we act as responsible adults, taking this responsibility to clean up our shared waters very seriously.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #637.

Timestamp 1/13/2013 5:31 PM

**Name** Brent Bierbaum

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I am writing in support for Iowa's nutrient reduction strategy. Being a farmer, I know the importance of tailoring the practices to individual circumstances. One size does not fit all, and this is a good start to it. I also know the importance of reducing our fertilizer loss, not only for the health of the watersheds, but for our own financial wellbeing. Brent Bierbaum

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #638.

Timestamp 1/13/2013 5:43 PM

**Name** Ben Pullen

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am writing to state my support of the Nutrient Reduction Strategy and other conservation cost-share programs. I must say I think Iowa is taking the right approach by using science backed policy instead of emotional responses. I also believe we have to be we have to be cautious with environmental programs that we do not end up in a position where we have one size fits all programs that do not help anyone. I believe in this situation we have taken experts that know what they are doing have drafted policies that leave freedom for area differences, and allow people to voluntarily participate which will lead to better participation. Ben Pullen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #639.

Timestamp 1/13/2013 5:44 PM

**Name** Gary Zhorne

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

It is imperative that we use a science-based nutrient reduction strategy that recognizes the use of voluntary conservation practices and the dire need to maintain agricultural production. It is important that lawmakers adequately fund the Iowa Nutrient Reduction Strategy, as well as the other conservation cost-share programs. On our farm we are using water ways, farmable terraces and other common sense approaches to keep our soils in place. Cover crops could also help to keep our "N" from moving but I think we need a bit more research to find an economic crop to plant this far north. Please support this approach rather than having the E.P.A. come in with their smoke and mirrors they have been using for 20 years in the Chesapeake Bay area. Gary Zhorne

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #640.

Timestamp 1/13/2013 5:48 PM

Name Chris Prizler

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

As a member of a family farm, I would like to express my concern in supporting the funding of the Iowa Nutrient Reduction Strategy. I feel that as an Iowa farmer we need to stay on top of programs that protect water and soil quality. I feel that this program is key in staying ahead of regulations. If we can show improvement in EPA standards, we will steer clear of mandates that could be soon to come. I think everyone in the world is for clean water. Our farm is very conservation minded. We own dirt scrapers, dozers, and tiling machines. We have added many terraces, tile lines, grassed waterways and basins in the past years and intend to keep that stewardship going. I see my neighbors doing the same and with programs such as this, more will follow. Chris Prizler

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #641.

Timestamp 1/13/2013 6:18 PM

Name Robert Witt

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I wish to express support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need maintain agricultural production. I also urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. On my operation I have started with some terracing and tiling and hope to use some cover crops in the fall after the crop, to have feed for the cattle. Robert Witt



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #642.

Timestamp 1/13/2013 7:22 PM

**Name** Adam Gibson

**City**

**State**

**Providing comment on the following sections:**

Executive Summary     Nonpoint Source  
 Policy                       Point Source

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Secretary of Agriculture Northey,

I am writing to ask for your support of a science based, voluntary state wide nutrient reduction program. I believe a voluntary approach helps showcase the efforts of Iowa's farmers that have been striving to preserve the land we farm for future generations.

Also I am writing to ask for your support to adequately fund the Iowa Nutrient Reduction Strategy as well as other important state wide conservation cost-share programs. Without fully funding these programs, costly delays in conservation projects have occurred.

Thank you for your support. Adam Gibson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #643.

Timestamp 1/13/2013 7:45 PM

**Name** Perry Parker

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

Iowa farmers are recognized leaders in agriculture. One way Iowa farmers have become leaders is by voluntary conservation practices and reduced use of fertilizers.

In order to keep Iowa farmers as leaders I am asking you to fund the Iowa Nutrient Reduction Strategy, and the states other conservation cost-share programs. Iowa has failed to adequately fund these programs in the past.

Help us keep these programs voluntary. Perry Parker

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #644.

Timestamp 1/13/2013 7:50 PM

**Name** Mark Recker

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I want to strongly encourage you to recognize the need for funding Iowa's Nutrient Reduction Strategy. Implementing conservation projects is the surest way to positively impact the environment. Over the years I have employed terraces and buffer strips to reduce runoff and soil loss. Cost sharing these types of projects benefits farmers, consumers, and the environment. Mark Recker

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #645.

Timestamp 1/13/2013 8:14 PM

**Name** Kevin Sutcliffe

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I'm in support of a science based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices. On our farm we have many grass waterways that we have planted and bale hay off. These waterways could be planted to row crops, but we choose to voluntarily keep them in grass.

We also have over 100 acres in CRP ground. I urge state lawmakers to adequately fund the state's conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

In the future we plan on implementing more conservation practices to benefit our farm and the surrounding environment. Kevin Sutcliffe

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #646.

Timestamp 1/13/2013 8:43 PM

**Name** Joel Huber

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please support the science based nutrient reduction strategy. Funding for this program is needed to keep the EPA from making non-science based laws. Joel Huber

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #647.

Timestamp 1/13/2013 8:48 PM

**Name** Garry Zumbach

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I am asking you to support and fund the Iowa Nutrient Reduction Strategy. Farmers understand the need for conservation practices to improve water quality. With the help of ISU research, they can determine which practices are best for their farm. We use stream borders and field waterways to minimize runoff on our farm. I believe voluntary practices based on science and technology are the best approach to improve water quality. Garry Zumbach

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #648.

Timestamp 1/13/2013 8:48 PM

**Name** Kevin Sprung

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I strongly urge you join me in supporting the Iowa Nutrient Reduction Strategy as developed by IDALS, the Iowa DNR and ISU. This science based voluntary approach allows farmers to adopt conservation practices best suited to their farms. Because I am concerned about water quality on my farm, I have been planting grass hay strips along drainage ditches and waterways to help filter storm water runoff. It is important for us, our children and future generations that you maintain funding for all conservation programs in Iowa. Kevin Sprung

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #649.

Timestamp 1/13/2013 9:16 PM

Name Mark Vagts

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I solicit your support for the Iowa Nutrient Reduction Strategy. Funding is important to make this program work. Sound science is being provided and response will occur more favorably through education rather than regulation.

On our livestock farm, we have built terraces, some government supported, others by our own personal funding, to reduce soil loss. Half of our crop acres are planted to alfalfa. Of our remaining crop acres, we are increasing the amount of no till planting each year. We are currently no tilling corn into alfalfa, beans and rye, and approximately twenty five percent of our corn on corn acres. Rye is planted on the fall manure applied fields as a winter cover crop to reduce erosion and improve soil structure. Application of nitrogen is split between spring planting and a second application in late June for better plant utilization and to reduce leaching into the water system. It also allows us to reduce the total amount applied.

These practices are voluntary and have come from educational programs and seminars, and sound science; not because of regulation. Therefore I urge you to support the funding for the Iowa Nutrient Reduction Strategy and promote nutrient reduction in water through education and sound science, rather than government regulation. Mark Vagts



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #650.

Timestamp 1/13/2013 9:52 PM

Name Robert Siegle

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support a voluntary conservation effort on the part of farmers to benefit water quality in Iowa. Fertilizer prices are high, and full usage by the crop is important to us. Personally, I monitor my fertilizer uptake and application. I have begun fall cover crop planting. I have had CRP Filter Strips at possible runoff areas for many years, and have renewed NRCS contracts for the same. My family, grandchildren and I drink the local ground water. I have a vested interest. I believe that voluntary conservation practices on farms are doing much for water quality. Thank you for your consideration of this matter. Robert Siegle

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #651.

Timestamp 1/13/2013 10:20

**Name** Barry Anderson

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**  **Nonpoint Source**  
 **Policy**  **Point Source**

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Secretary of Agriculture Northey,

Today I would like to express my support for a science based state nutrient reduction strategy. To do this we would need voluntary conservation practices, as well as the need to maintain agricultural production.

I hope as lawmakers you understand the need to adequately fund the Iowa Nutrient Reduction Strategy, along with Iowa's other conservation cost share programs. Due to the failure to adequately fund these programs in the past there have been delays on needed conservation projects.

My father and I have added eight terraces to our ground to help with erosion, as well as using minimum tillage practices on our farm. I hope you will think about the definite need in this matter. Barry Anderson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #652.

Timestamp 1/13/2013 10:52

**Name** Leo Stephas

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

As a no til farmer for the past 25 years and using minimum tillage for 10 years before that I encourage you to support voluntary conservation practices rather than mandatory control. Too many mandatory rules and regulations are made on the basis of: I think, I feel therefore I know: rather than science-based decisions.

The Iowa Nutrient Reduction Strategy is good beginning based on sound science, and I urge that adequate funding be made available for this program and other conservation cost-share programs.

I feel that we are on the verge of awaking a voluntary conservation movement with the Iowa farmer becoming aware of the problems facing them with mandatory regulations. The Iowa Nutrient Reduction Strategy is a good beginning and needs to be continued. Leo Stephas

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #653.

Timestamp 1/13/2013 11:08

**Name** Brent Bronner

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I farm in Howard County and believe that a voluntary approach to conservation will improve our water quality and lower overall costs of government. We have maintained grass waterways and crop rotations which includes oats and hay on the Bronner farm for four generations and plan to leave the farm in better condition for the next generation.

Please fund the Iowa Nutrient Reduction Strategy and other cost-share programs. A science-based strategy and conservation practices will help maintain agricultural production for the future. Brent Bronner

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #654.

Timestamp 1/14/2013 4:30 AM

**Name** Adam Ebert

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

As the nutrient reduction strategy is forming, it's important to consider ways that will work. A strategy that is fact and science based will be the best perceived. Most farmers are great stewards of the land and par-take in voluntary conservation programs. A similar approach could be taken here as well, a cost- share program would work if properly funded. Adam Ebert

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #655.

Timestamp 1/14/2013 8:12 AM

**Name** Dan Dreeszen

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing to ask for your support for a science based nutrient reduction strategy that will get consistent participation from producers using a voluntary approach as it allows continued maximum crop production. The program must be well funded to work. Increased regulations will push all costs onto producers and most likely limit crop potential thereby hurting producers and a fragile ag economy. I have used a couple wetland programs and reduced tillage based on conservation research to improve water and soil quality and retention on my farm ground.  
Dan Dreeszen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #656.

Timestamp 1/14/2013 8:26 AM

Name Marilyn Platner

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

We support your nutrient reduction strategy using science to determine which voluntary conservation practices work best .

Our farm has been in the family since about 1920 and we have used many voluntary conservation practices over the years including properly farming HEL soils, leaving buffer strips along streams, reshaping and widening waterways not only on our farm but with approval of the landlords, rotating crops including not only corn and soybeans but also alfalfa, oats and rye.

We know best how to handle the tillage of the soils on our farm. A science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production is always the best approach! Marilyn Platner

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #657.

Timestamp 1/14/2013 8:27 AM

**Name** Dwight Hobson

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

As a SWCD commissioner, I can assure you that the voluntary approach Iowa has used to implement soil conservation is very effective. The demand for cost share outstrips our funding every year. The newer practices, cover crops, biofilters, etc. are in the beginning stages but seem to be effective and easily implemented. The Iowa Nutrient Reduction Strategy will continue the mission we are applying every day. Keep this voluntary! Think what could be accomplished with a bigger commitment. If we are truly committed to reducing our N and P that escapes, I'm sure you'll support legislation that implements the reduction. Thank you. Dwight Hobson



**Name** barbara harre**City** davenport**State** iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

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As I reviewed the report and recommendations, I was struck by how much science, research and study was involved to reach the conclusions. This is a very complicated subject that obviously cannot be addressed by simple black and white rules. As we should also be aware in Iowa, statistical averages are only that. They do not hold fast year in and year out. What worked in 2012 was different than what worked in 1993. I truly believe that the majority of Iowa agricultural workers are very interested in stewardship of their land and resources. That is evident by the significant improvements that have been made in land management over the past 50 years. No change or changes will have miraculous effects in a short period of time. Our land is a living and interactive system. I believe the plan being offered is well studied and thought out. I believe that Iowa farmers will respond positively to implement the practices esp. if given support. I was raised by a farmer who implemented tile systems, terraces, drop structures, natural stream controls, etc. I have implemented limited till practices, soil testing with directed amendments, planted a riparian buffer system with 7000 trees, incorporated rotational grazing, limited animal access to streams, and am exploring crop cover. I sincerely care about the land and environment and have done so long before it became popular to do so. Encouraging, supporting and working with our farmer neighbors will be a lot more effective than heavy handed tactics that are not balanced in their approach.

I applaud the effort that went into this project and would support moving forward with this.

**Name** David White  
**City** Charlottesville  
**State** Virginia

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input checked="" type="checkbox"/>	<b>Point Source</b>

January 14, 2013

The Honorable Bill Northey  
Iowa Secretary of Agriculture

The Honorable Charles Gipp  
Director, Iowa Department of Natural Resources

Dear Secretary Northey and Director Gipp:

I commend Iowa's leadership for proactively advancing efforts to reduce nutrient loss to Iowa's and the nation's waterways. It is absolutely critical for agriculture and other sectors to cooperate in developing a cost effective strategy on nutrient reduction. I believe your strategy, if designed and implemented correctly, will result in real and lasting reductions in nutrients in Iowa rivers and streams and, ultimately, to the Gulf of Mexico.

The science underpinning your strategy is impressive and provides a sound basis upon which to develop implementation actions that will provide dividends for the environment, for farmers, and for ratepayers in municipalities.

As you consider the specifics of building the program I believe there are four key steps for Iowa to lead the nation in this effort:

First, include clear, time-bounded goals. The overall strategy sets some ambitious, but achievable, objectives for both point and nonpoint sources, but clear goals, with reasonable timeframes, are vital to measuring progress and providing for adaptive management.

Second, reward agricultural producers and others who take action that results in reduction of nutrient loss to waterways. If someone takes action that results in offsite environmental improvements, for which they receive no economic or other benefit, the strategy should reward their efforts. Sound environmental actors should be rewarded for their actions just as we reward the production of other goods and services. Without linking an incentive to the implementation of practices that improve environmental outcomes there will be little reason to invest time and money in actions that result in improved water quality.

Third, foster cooperation between different sectors of the economy. If for example it is more cost effective to achieve reductions in nutrient loading through changes in agricultural practices than municipal or industrial sources, mechanisms should be set up to encourage those actions. Trading of environmental credits has been well documented to drive down the cost of achieving environmental goals. Increasing the choices available to achieve water quality outcomes lowers costs and reduces constraints on decision makers.

Fourth, seek simplicity. Too often nutrient reduction frameworks in other parts of the country are so complex that they have precluded trading or nutrient reduction actions from occurring. In other cases they have resulted in shifting nutrient loads from one watershed to another. Instead, Iowa can lead the country by adopting a common sense approach that rewards cost effective nutrient reduction actions without encumbering actors in unproductive and unnecessary red tape.

You have the opportunity to redefine how nutrient trading is done and cut through the confusion and clutter. Success will depend on a system that is practical, simple, and understandable by farmers; one that provides cost effective value to the 130 municipal and industrial facilities, and one that establishes clear time frames upon which to measure success.

Your strategy offers hope that, by fostering cooperation rather than confrontation you can achieve real and lasting progress in nutrient reduction.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 2 of comment #659.

Timestamp 1/14/2013 8:35 AM

**Name** David White

**City** Charlottesville

**State** Virginia

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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With every best wish,

Dave White

Former Chief, Natural Resources Conservation Service

1725 Mattox Ct.

Charlottesville, VA 22903

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #660.

Timestamp 1/14/2013 9:10 AM

**Name** Curtis Frazee

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would like to encourage you to support funding for the Iowa Nutrient Reduction Strategy, as well as conservation cost share programs. They benefit all lowans, not just farmers.

On our family farm we have used these types of funding over the years to construct new terraces to control sediment runoff, install grass waterways and filter strips, as well as construct a hoop building to feed cattle. This building replaced all of our open feedlots, eliminating all runoff that could have been a potential problem.

Please continue to support the funding for these programs, as they greatly benefit farmers and the general public.

Thank you for your consideration in this matter. Curtis Frazee

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #661.

Timestamp 1/14/2013 9:25 AM

**Name** Roger Pendleton

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing in regards to the Iowa Nutrient Reduction Strategy. As a farmer, I recognize first hand how the state needs to develop a plan based upon science. With solid science, farmers can utilize much of the information to voluntarily implement sound conservation practices.

Voluntary conservation practices have been a large part of my farming operation. Practices such as reduced tillage and no till have greatly helped our environment. We have even given greater grass setbacks next to creeks and waterways as a voluntary way to help.

So please fund the Nutrient Strategy. The benefits from it, can and will greatly aid us as a state and nation. Roger Pendleton

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #662.

Timestamp 1/14/2013 9:25 AM

**Name** Adam Gauger

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Lets make Iowa a leader in conservation by supporting the Iowa Nutrient Reduction Strategy. We need to fund a science based nutrient reduction strategy to avoid the one size fits all regulations. We all want to be part of a solution that is cost effective and will have the greatest benefit on water quality.

Please support funding the Iowa Nutrient Reduction Strategy.

Thank you for your time and service to our state. Adam Gauger

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #663.

Timestamp 1/14/2013 9:28 AM

**Name** Lynne Rosendahl

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

While I am all in favor of reducing nutrient impacts on our environment we need to be careful of how we go about it, and come up with something that is equitable for both farmers and taxpayers. In the last 20 years we have seen a significant increase in tracts of land that are turned into wetlands when only a part of the tract really fits the bill. We lost such a tract 3 yrs ago that only 1/2 of it shouldn't be farmed and the rest of it now just grows flowers. On my home farm I have several hills that I only grow hay on and use it to feed my cattle. A friend has a beef cow herd and is being forced to cut his numbers in half because the pastures that he had are being turned into wetlands and can't be used. Using the land for growing things other than growing row crops might be a better approach than just following the land. Lynne Rosendahl

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #664.

Timestamp 1/14/2013 9:41 AM

Name Tim Hibma

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I am writing to encourage you and our state leaders in the adequate funding of the proposed Iowa Nutrient Reduction Strategy. I believe through this strategy and the state's other cost-share programs, Iowa can lead the nation as an innovator in protecting our natural resources while continuing to feed the world through production agriculture.

By utilizing a science based approach and a voluntary program our state and its agricultural producers can craft programs and practices best suited for the state's vast and variable landscape while insuring we remain a leader in production agriculture.

Our family farm located in northwest Iowa operates on a variety and varying style of land. Ranging from nearly table top flat, gently rolling, to some with more slope than we would like, each farm is different and therefore requires we manage differently.

Through the use of terracing, waterways, CRP, buffer strips, no-till, and min-till practices we are able to manage our productive natural resources and protect them for further generations.

The soil and water of the state of Iowa are our most valuable assets, and through a science based approach can be protected and improved for a more productive, safe, and bright future. Tim Hibma



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #665.

Timestamp 1/14/2013 9:49 AM

Name Vicki Allen

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am sending to show my support for a science-based state nutrient reduction strategy that recognized the importance of voluntary conservation practices.

As a Soil and Water Conservation District commissioner in Union County for the past 4 years I have seen how well voluntary conservation programs work. We consistently have more applications for cost share than we have cost share dollars. We have many farmers in our county that are using the low interest loan program to help where cost share dollars fall short.

Farmers are willing to do what is right and keep the soil where it belongs but with the high price of land they also need to use every bit of the land to raise a crop. With technical support and guidance conservation programs can be put in place to protect the soil and let the farmer profit from his land.

Adequately funding the Iowa Nutrient Reduction Strategy as well as other conservation cost-share programs is a win win for everyone in the state of Iowa. Iowa has made a lot of progress in the last decade or so protecting our soil and water. We not only need cost share dollars to continue protecting our resource but we need the technicians and office staff to make sure the practices are appropriate for the land they are being placed on.

Thank you for your past and future support! Vicki Allen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #666.

Timestamp 1/14/2013 10:15

Name Rebecca Hosek

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy that will allow me to continue farming and following my conservation practices. I work closely with my NRCS in Tama county to make sure the tillage practices I use will result in the least amount of run off possible.

We need to make sure we adequately fund the Iowa Nutrient Reduction Strategy, along with the state's other conservation cost-share programs. I am involved in an EQUIP Contract right now that is allowing me to improve my farm ground at minimal cost to me. I am trying to implement a rotational grazeing practice for my cattle to maximise the use of what little pasture I have. These improvements are benefitting me as well as the environment, and I know in the long run my children will appreciate my efforts as well. Please support our rights as farmers to do what is best for our land. Thankyou for believing in us! Rebecca Hosek

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #667.

Timestamp 1/14/2013 10:25

Name Jay Hofland

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I would like to request your support for a science- based nutrient reduction strategy for Iowa. As a livestock producing farmer in Iowa, I work hard to implement sound management practices, and I take pride in my care for Iowa's environment while continuing to provide the food our state, country, and world needs. I have put in waterways, soil retention structures, and use my animals nutrients to their fullest potential to maximize their value while protecting the environment.

Please fund the Iowa Nutrient Reduction Strategy. This strategy along with other conservation measures will work to protect our environment. Iowa's failure to fund conservation programs has limited the ability of producers like myself to best protect Iowa's environment. Please work with livestock producers such as myself in a positive way to meet Iowa's nutrient management goals. Jay Hofland

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #668.

Timestamp 1/14/2013 10:32

Name Dale Farnham

City Ames

State Iowa

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

On Page 14, the top bullet point, there are some statistics quoted by The Fertilizer Institute. It says that there were 6.64 billion bushels of corn produced in 1980 using 3.9 pounds of nutrients per bushel produced. If I do the math, that equals 25.896 billion pounds of nutrients. In 2010, it says that there were 12.45 billion bushels of corn produced using 1.6 pounds of nutrients per bushel produced. That equals 19.92 billion pounds of nutrients. The statement then says that there was an 87.5% increase in production with 4% fewer nutrients. I agree with the increase in production number, but not the change in nutrients. My math says that the difference is 5.976 billion pounds of nutrients which would result in a reduction of 23.1% (5.976 divided by 25.896). Am I missing something, or is my math correct?

I also was disappointed to see the lack of any impact on N and P levels related to wildlife, in particular geese. Iowa has more than 250,000 acres (The World Almanac of the USA, 1996) of water, much of which is inhabited by waterfowl year-round now. Their direct discharge into these surface waters should not be ignored.

In addition, I'm disappointed that "stormwater" was not seriously considered either. Quoting the Executive Summary,

"No specific nutrient reductions have been targeted for municipal storm water discharges. Due to the intermittent nature of such discharges and their relatively small contribution to the statewide nutrient load this document does not address specific storm water reduction targets."

I have concerns that a significant amount of nitrogen and phosphorus applied in urban areas is not being utilized by turf and landscape plants. Quoting from a US EPA article on Polluted Runoff (Nonpoint Source Pollution),

"Researchers at Cornell University found that 60 percent of nitrogen applied to turf leached to ground water (Long Island Regional Planning Board, 1984). Shultz (1989) suggests that 50 percent of the nitrogen applications are leached out and not used by plants. A study completed by Exner and others (1991) showed that as much as 95 percent of nitrate applied in late August on an urban lawn was leached below the turf grass root zone."

In addition, the amount of fertilizer that is deposited on sidewalks and streets can be staggering at times. This results in a direct entry point for N and P into stormwater which is ultimately discharged into Iowa's rivers and streams.

I really feel these areas (wildlife and stormwater) should be addressed in the Nutrient Management Strategy.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #669.

Timestamp 1/14/2013 10:40

**Name** Brent Kuehnast

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

We own and operate a family farm in NC Iowa and encourage you to support the current science-based state Nutrient Reduction Strategy and to fund this and other such cost-share programs accordingly.

We believe in voluntary conservaton practices and have implemented a variety of them on our farm for many years. We are currently using GPS and VRT technolgy for better placement of commercial and manure programs. We use lower rates of chemicals in combination with mechanical practices for weed control. We are also doing more reduced tillage on our farm in both corn and beans.

We believe these practices prevent contamination by preventing runoff as well as reducing total lbs of products applied. In some cases we save money but more importantly protect our soils and water sources.

Thank you for your support of this initiative and its' funding. Brent Kuehnast

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #670.

Timestamp 1/14/2013 10:51

**Name** Jason Sallach

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please support a science based state nutrient reduction strategy and adequately fund it and other conservation cost share programs. Jason Sallach

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #671.

Timestamp 1/14/2013 10:53

**Name** John Fluit, Jr.

**City** Inwood

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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While not overly familiar with the whole Nutrient Reduction Strategy, I have a few simple comments.

I feel all environmental policy should be studied and approached on a cost/benefit basis. I would also like to strongly remind all parties involved that environmental policy is the biggest obstacle to young beginning livestock producers. Especially in livestock concentrated areas such as Lyon/Sioux County, Iowa. While most beginning producers can figure out a way to build or buy a livestock production facility, it is fast getting to the point of being impossible to get manure rights to any land in these areas let alone the astronomical figures land is bringing per acre.

Thank you for your consideration.

John Fluit, Jr.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #672.

Timestamp 1/14/2013 10:57

**Name** William Frazee

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

The Iowa Nutrient Reduction Strategy can be a very important part of Iowa's efforts to maintain and improve Iowa's agricultural production. It is a science based effort that recognizes the importance of Iowa's strong history of voluntary conservation practices.

We have done much in the state to reduce agricultural runoff in the state over the last many years. On our farm, we have installed terraces, waterways, gone to no-till farming, and eliminated our open cattle feedlot and replaced it with a hoop building.

I urge you to adequately fund the Iowa Nutrient Reduction Strategy, along with other cost-share programs. We need to keep Iowa moving forward by using these voluntary, science based practices instead of creating more mandatory regulation. William Frazee



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #673.

Timestamp 1/14/2013 11:14

**Name** Michelle Euken

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am writing to express my support a science-based state nutrient reduction strategy. One that recognizes the importance of voluntary conservation practives, and one that will also maintain agricultural production.

We need our state lawmakers to adequately fund the Iowa Nutrient Rudction Strategy. We also need our state lawmakers to fund other conservation cost-share programs. If Iowa fails to adequately fund these programs, it will delay crucial conservation projects, which we cannot afford to do.

Please support and adequately fund a science-based state nutrient reduction strategy! Michelle Euken

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #674.

Timestamp 1/14/2013 11:14

Name Terry Lewis

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Excess nutrients are a problem that leads to the degradation of our waters and ends up costing everyone in the long run. I do believe that the voluntary nutrient plan developed with Iowa State University deserves your consideration before passing legislation that requires increasing the present size of regulators and penalizes all farmers.

If either voluntary or mandated reduction is going to be successful the programs need to be funded. My wife and I have spent and continue to spend thousands of dollars on conservation practices. Without cost-share much less would get done. If I had my way not a drop of water or grain of soil would leave our farms.

I do hope that there is a mechanism built into the program that offers some monitoring to show the success of the program and the source of the problems. I would be interested in knowing what cities are doing to clean up their act. Thank you for your time and consideration.

Sincerely

Terry Lewis Terry Lewis

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #675.

Timestamp 1/14/2013 11:48

**Name** Lenard Orth

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

As a farmer, I rely on sound scientific practices to raise my crop. I appreciate that the main partners of the Iowa Nutrient Reduction Strategy, Iowa State University, IDALS, and the DNR are moving forward on similar principles to resolve the issues of Gulf of Mexico hypoxia. Together with Iowa's farmers, we can resolve this going forward.

In order to accomplish this, I am asking for your continued support and funding of the Iowa Nutrient Reduction Strategy. In addition to this, adequate funding for approved conservation practices is critical to implementation of this plan.

With the recent improvement of the state's financial condition, I ask that you keep the funding needs and importance of this task force in mind, so that they might continue to develop sound science practices which can be implemented on our farms. This will benefit our environment, without causing undue detriment to continued strong Iowa agricultural production. Lenard Orth

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**676**.

**Timestamp** 1/14/2013 12:11

**Name** Stacie Euken

**City**

**State**

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

As an agriculturalist, I recognize the need for conservation practices. Like most, I take the environment, our water sources, and water quality into account in all I do. When I have questions, I turn to research conducted by Iowa State University, the Iowa Department of Agriculture & Land Stewardship, and the Iowa Department of Natural Resources because I trust them to know what's best, not only for me, but for the world we live in.

I support science-based nutrient reduction strategies. It recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. I ask that you also support such cause by adequately funding the Iowa Nutrient Reduction Strategy, as well as Iowa's other conservation cost share programs. Failure to do so will only delay needed conservation projects.

Thank you for your time and consideration. Stacie Euken

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #677.

Timestamp 1/14/2013 12:22

**Name** Anthony Portz

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I would like to ask for your support for a science-based state nutrient reduction strategy to recognize the importance of voluntary conservation practices.

Production agriculture is extremely important to this nation and its economy as well as the health of our nations water supply. I myself implement many techniques by working with the county NRCS office to prevent erosion control and runoff. These practices help keep soil nutrients from entering our water supply increasing water quality.

I believe Iowa needs to be a front runner in funding the Nutrient Reduction Strategy Program as well as the states other conservation cost-share programs. These programs aid farmers with practices that improve our water quality.

Again, Thank You for your time. Anthony Portz

Name Veronica Lack

City Iowa City

State Iowa

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input checked="" type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input checked="" type="checkbox"/>	Point Source

I filed a discrimination charge in 2010 against Iowa's DNR for not giving me and others downstream our well test reports and not enforcing the Clean Water Act. They denied me for 16 years until 2009 and lying to me about those results for those 16 years so that the groups of Mitchell County Farmers could drain their land down sinkholes to grow corn on sinkhole prone karsted very limited soil depth aquifer recharge areas of Mitchell County Iowa. But with the help of a Sierra Club attorney I was able to get the test results for groups of contaminated wells later in 2012. The on-going documented pollution plume had continued into Floyd County as Ray Franna, former Osage NRCS worker, said in 2007, I should stop worrying about it since all the wells in the plume were contaminated down to the Floyd County border it was, as he said, Floyd County's problem now. My renters well in Bremer County is contaminated downstream and the water in Iowa City tests positive for it too. Why do we Iowan's have to pay with our health while the state agencies that are to protect our water and lives not enforcing the Clean Water Act against this known and documented point source pollution plume, just so this small group can profit? Mitchell County refused to answer court ordered subpoenas, because as their liability attorney claimed I would sue them if they did. Why is Mitchell County above the law and allowed to plan these sinkhole Flood drainage channels through lines of sinkholes? That is Point Source polluting and one way that I know of that directly channels Anhydrous Ammonia into our drinking water. Since I lost the case the IDNR said I had to file against the polluters who lied under oath that they were at my dining room table on 4/16/2003 (which they weren't) and that my dead husband had agreed for them to come back a year and apart after his death to dig a channel a mile long to dump into a National Wetland with 6 huge sinkholes to drain their land. Instead it was Dean Kleckner, the former head of Farm Bureau, in the police car on 4/16/2003, since I had charged him his contractors with digging through my north 80 west joint property line fence on 4/15/2003 and removing my topsoil and fence, to channel runoff water through sinkholes on Dean Kleckner's property across to mine. The Disposition of that trespass charge was Dean Kleckner had agreed to have Mayer's Digging Company replace my fence, and return my soil to its prior grade or field surface. The judge and jury in that Mitchell County courtroom that cost me \$47,000 in lawyer fees just to get into court were mostly from areas or owned land that did not have legal drainage outlets. The IDNR's lawyers had agreed that if I didn't file that suit on the suggestion of the IDNR and USDA-NRCS I could be charged with the flood damages and pollution of our aquifer if I didn't legally protest. I was up against a band of hornets with my son Adam's help we did prove in court that channel had not been their before and they formed a juantlet as we left the court room yelling that back at us, with the threat they were going to get this illegal practice "Grandfathered In". Seems hard to believe farmers could be so greedy to have my husbands body cremated without my permission before he was even seen by a doctor. They later said you can't prove he died because of the pollution because Gary was cremated. The worry that Gary was just in a coma when burned haunts me. But the greater haunt is I am dealing with the health effects of drinking that water and worry about all the others downstream that are now drinking the on-going and increasing polluting since this drainage ditching to sinkholes is now an allowed practice getting more unsustainable farmers to do it since it brings in Big Dollars. We cannot leave the protection of our drinking water up to the discretion of polluters. Look downstream to what it has done to the Gulf's Dead Zones. Watch the documentary film, "Troubled Waters: A Mississippi River Story". It shows some sustainable farming practices that could be part of the ways to limit the growth of this pollution because of the overuse and improper application of Anhydrous Ammonia on the Karsted, very limited soil depth, sensitive Recharge areas for our underground rivers (aquifers) that have been the source of good drinking water in the past for Iowan's. The last question Ursbatch, one of the polluters upstream asked me was, "Was why didn't I die from it? My Mayo oncologists are still working on figuring out why some survive it may be my chemotherapy for the cancer was that more adept at treating mine than Gary's or our immune systems were different in that I had never smoked? But Gary's high Potassium levels only went up when he drank more water as the Mayo oncologist had ordered, but the IDNR had withheld our well tests that Mayo now has copies of we did not know until after Gary was dead that our water was contaminated with Anhydrous Ammonia at levels 2 to 12.2 on the Ammonia Nitrogen as (N) well water tests and our Nitrate tests were at 78 to 95. Any way you total those two test results our wells were deadly. Please make an example of these lying farmers in Mitchell County and the Mitchell County Engineers (Bill Grokurs and Jim Hyde) who helped plan these connect the dots sinkhole drainage systems for farmers who had no legal drainage outlets.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #679.

Timestamp 1/14/2013 12:49

**Name** Cris Friedrichson

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

On my farm, we already have seeded waterways and practice both strip-tilling and no-tilling on ALL of our crop acres to reduce runoff to the South Skunk River and nearby creeks.

It is my understanding, that a lot of the nitrates and P&K found in the Mississippi River are from water treatment plants and residential citizens trying to achieve a "greener" lawn!!! Less than 10% of all that is from a farmers runoff!!!

So, please support the Nutrient Reduction Strategy and other conservation programs so that projects can be immediately implemented when necessary. Cris Friedrichson

**Name** Chris Wilbeck**City** Rippey**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

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**IMPACT OF CONFINEMENTS NOT EVEN ADDRESSED IN PLAN**

The Iowa nutrient reduction strategy falls short. Beyond a mere reference of confinements in the summary, the current and future negative impact on water quality from animal livestock confinements (CAFOs) is not even addressed or considered. This is a serious oversight, given that confinements produce millions of gallons of manure and are a significant nonpoint source of water pollution.

In particular, there is no mention of how to address the negative impact on water quality due to the unchecked growth of the number of confinements, the increased chance of over-application of manure due to overlapping manure plans, or the probability of significant water quality impairment when confinement construction is not limited in subwatersheds already defined as high priorities for the reduction of nitrates.

How can the nutrient reduction strategy succeed when CAFOs - a significant source of the problem - are not even considered or accounted for in the strategy?

**Increase in CAFOs:**

Last year, 14 applications for new construction or expansion of existing hog confinements (requiring manure management plans) were approved in Greene County alone. The county now has 69 hog confinements and more than 240,000 hogs (source DNR CAFO database). The N. Raccoon River - identified as already having a high nitrate problem - runs through the county. The new or expanded hog CAFOs are projected to produce approx. 10 million MORE gallons of manure per year, bringing the total annual hog manure production in Greene County to more than 50 million gallons. The nutrient reduction plan does not address the increase in the amount of manure produced by new or expanded hog confinements across the state. It is surely reasonable to assume that a portion of that additional manure will ultimately enter our waterways and the plan should address this likelihood.

**Over-Application of Manure:**



**Name** Chris Wilbeck**City** Rippey**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

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More confinements also mean the probability that over-application of manure may occur due to overlapping manure management plans (MMPs). The DNR currently has no mechanism in place to check for overlapping MMPs. In 2012, Prestage Farms was approved construction for PI312, a 4900-head hog confinement in Washington Township, Greene County. The MMP for PI312 overlapped with another CAFO's MMP, resulting in the potential for over-application of manure on the land in the plans. The DNR only became aware of this overlap when neighbors opposing the CAFO construction discovered it and notified the DNR. The nutrient reduction plan does not address measures to prevent such overlap and thus does not limit the increased potential for over-application of manure.

**Construction on Priority Subwatersheds:**

There are no measures currently in place to restrict confinement construction on subwatersheds that have already been identified as very high priorities for the reduction of nitrates. In 2012, Prestage Farms was approved construction for PI355, a 4900-head hog confinement in Washington Township, Greene County. This CAFO was built on land in Fanny's Branch of the N. Raccoon River. Fanny's Branch has received significant MRBI funds (NRCS) for nitrate reduction study and has also been identified in the Raccoon River Water Quality Master Plan (M&M Divide RCD for DNR 2012) as a very high priority subwatershed for targeting the reduction of nitrates. However, even though residents opposing the construction of the CAFO pointed this out to county and DNR officials, the information was not even taken into consideration when the permit application was reviewed and ultimately approved. While the nitrate reduction strategy mentions that priority subwatersheds will be identified, there is no indication in the plan regarding what restrictions will be placed on what types of activities in those watersheds. In particular, there should be acknowledgment that restrictions should include prohibiting or limiting CAFO construction, particularly given that concrete manure pits can crack and ultimately leak manure into the watershed.

**Summary:**

The nutrient reduction strategy needs to include measures to account for the impact of current and future hog confinements - a significant nonpoint

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **3** of comment #**680**.

**Timestamp** 1/14/2013 12:56

**Name** Chris Wilbeck

**City** Rippey

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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source of water pollution - or it will ultimately fail in making any significant progress in reducing nitrates in our water.

Chris Wilbeck

Greene County Iowa

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #681.

Timestamp 1/14/2013 1:05 PM

**Name** Chondra Rankin

**City** North Liberty

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #682.

Timestamp 1/14/2013 1:05 PM

**Name** Penelope Mazza

**City** FAIRFIELD

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I would like the state to consider an environmentally stronger nutrient reduction strategy which moves agriculture away from the intensive use of pesticides and toward a sustainable model of agriculture. The specific issues I see with the current and proposed strategy are:

It relies entirely on the same voluntary approaches for agriculture that have failed to clean up Iowa's water.

It puts the bulk of the financial burden on taxpayers, even though profitable farm businesses are responsible for the bulk of the problem.

It fails to set any common sense standards to restrict a handful of the most polluting farming practices.

The strategy outlines no timelines, interim goals or means of measuring annual progress toward reducing agricultural pollution.

It includes no explanation of how the plans will be implemented, how problems will be prioritized or who will make these decisions.

Iowa's waterways and drinking water quality should not continue to be put at risk to benefit one method of successful agriculture. Water will continue to become an increasingly precious natural resource and should be conserved/preserved for future generations.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #683.

Timestamp 1/14/2013 1:07 PM

**Name** Michael Henning

**City** Waterloo

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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•The Nutrient Reduction Strategy is a start however it:

Relies entirely on the same voluntary approaches for agriculture that have failed to clean up Iowa's water. It must have mandatory aspects that have financial impact to the farmer / landowner if not followed.

Puts the bulk of the financial burden on taxpayers, even though profitable farm businesses are responsible for the bulk of the problem.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #684.

Timestamp 1/14/2013 1:08 PM

**Name** Dennis Lansink

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I feel this is a perfect solution to our clean water system in iowa. I'm talking Iowa's Nutrient Reduction Strategy program. A common sense approach to keep our farms producing the grain needed to feed, fuel and fiber the ever growing demand for our world, now and in the future. A vote to fund this program is what Iowa's agriculture needs to make us a leader in crop production. Dennis Lansink

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #685.

Timestamp 1/14/2013 1:10 PM

Name David Seil

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

Loss of soil nutrients from my farm is an ongoing concern. Water quality and a clean environment are important to me because I hope to pass this farm to my children in a better condition than I started with. Also, because fertilizers are expensive, it makes good economic sense to retain as many nutrients as possible on the land.

Voluntary practices have historically been very effective on farms to reduce nutrient runoff. Some practices I employ are minimum tillage to keep soil in place, nutrient management to minimize the amount of nutrient available to leaching or erosion, and buffer strips to catch soil and nutrients before it can enter a stream. I think science based approaches are required, because I need to know a practice will work and, still, not hinder the crop's potential. I focus on solving the problem, and I demand predictable results.

I urge lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, and other cost share conservation programs. There is much we can do to continue to improve water quality here in Iowa. David Seil

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**686**.

**Timestamp** 1/14/2013 1:15 PM

**Name** Jenni Kothavale

**City** Clive

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Re: a Fight for cleaner waters in Iowa:

•While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

•History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

•The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

•Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

•The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

•The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

Respectfully submitted,

Jenni Kothavale



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #687.

Timestamp 1/14/2013 1:18 PM

**Name** Michael Blitz

**City** Farifield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Please make the people responsible for ruining our waterways pay for the damages they do the quality of our lives. Their profits need to cover their destruction. No more externalizing the costs to the taxpayers.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #688.

Timestamp 1/14/2013 1:20 PM

Name Laurie Calkins

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Polluted runoff from farmland is having serious effects on Iowa's drinking water. Excess nitrogen and phosphorous flowing from agricultural land into Iowa's rivers and streams trigger dangerous algae blooms, endanger public health and contribute to the notorious "dead zone" in the Gulf of Mexico. Isn't it time to start looking at what is happening to us and our children's health? Why does everything always benefit the corporations who want to make a big buck and not about what is right for our health and the health of the environment?

The state's proposed strategy falls short in many ways. History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem. It puts the bulk of the financial burden on taxpayers, even though profitable farm businesses are responsible for the bulk of the problem. It fails to set any common sense standards to restrict a handful of the most polluting farming practices. It includes no explanation of how the plans will be implemented, how problems will be prioritized or who will make these decisions.

Also, the strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

There is already so many diseases and cancers out there. PLEASE start thinking smarter about how to make our future safer!!

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #689.

Timestamp 1/14/2013 1:23 PM

**Name** Kerri Avery

**City** Salem

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem. The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy. The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #690.

Timestamp 1/14/2013 1:31 PM

**Name** Stacey Booth

**City** Waterloo

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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•While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

•The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #691.

Timestamp 1/14/2013 1:32 PM

**Name** Gary Dalecky

**City** Cedar Rapids

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow. The policy should make the big high profit farming operations to pay more to correct their damaging effects on the environment.

Gary Dalecky

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #692.

Timestamp 1/14/2013 1:44 PM

Name Sarah Wendt

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #693.

Timestamp 1/14/2013 1:56 PM

**Name** Patrick Stroud

**City** Norwalk

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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How is a voluntary system going to work when previous volunteer programs have NOT?

Why is the taxpayer on the hook instead of farm businesses for a problem that I and thousands of other suburban taxpayers do absolutely nothing to contribute to?

The plan as I understand it is incomplete. There are no standards, no timelines and no implementation plans included.

Is this the best that this state can do?

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #694.

Timestamp 1/14/2013 2:04 PM

**Name** Jon Koch

**City** Muscatine

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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\*There are numerous strategies outlined that non-point sources may implement, but there is no requirement for any of them to implement even minimal controls. As the largest contributing source there should be some minimal requirement to begin conservation efforts. A voluntary system has only been moderately successful for all previous conservation efforts. Without consistent implementation requirements, identifying sources of nutrient influence will be next to impossible.

\*Putting all requirements to point-sources alone burdens the taxpayer with the bill for the least reduction of pollution. I do believe point-sources should begin numerical limitations of nutrients, but the voluntary nature of non-point source conservation will not be enough to reach our goal of 40% reduction.

\*The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Industrial pretreatment programs expect no less from an industry that has been ordered to reduce its influence on the system. They are given milestones to achieve specified limits and must attain them to continue discharge. There is no strategy for even minimal controls to be set in place within a specified timeline with specific measureable goals. Farmers are committed stewards of the land and waters, but counting on voluntary work alone will not make the significant and consistent changes required.

\*There is little prioritization of the problem areas and who will implement the changes needed for non-point sources.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #695.

Timestamp 1/14/2013 2:04 PM

**Name** Renée Sluser

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

**Name** Andrew Davison**City****State****Providing comment on the following sections:****Executive Summary****Nonpoint Source****Policy****Point Source**

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Secretary of Agriculture Northey,

I believe it is very important the state of Iowa uses a science based state nutrient reduction strategy that takes in to account the importance of voluntary conservation practices. I think it is important that the state funds the Iowa Nutrient Reduction Strategy along with other conservation cost-share programs.

I grew up on a family farm that has practiced many conservation techniques in many different areas of our farming operation. I believe there are many other farmers out there practicing and implementing new conservation techniques to where we do not need on further government regulations. Here are just a few of the conservation practices that my family farm has done over the years.

1. We grid sample all of our row crop acres which allows us to variable rate our phosphorus and potassium over our fields so that the areas that need it most are getting higher amounts and the areas that have high test levels get less amounts. This not only cuts down our costs of fertilizer but it keeps us from over applying on the areas of the fields where we already have abundance of nutrients in the soil.
2. Our family farm also raises pigs. In order for us to apply manure in the fall and spring we have to have a manure management plan filed with the state/DNR. We have to file this plan so the DNR knows we are not over applying manure to our fields where are phosphorus levels are already high.
3. Our family farm uses a traditional tillage practice where we v-rip our corn stalks in the fall after we are done with harvest. Even though v-ripping may not sound like a conservation practice we are actually leaving our lighter soils/hill tops and not tilling these areas, while leaving the corn stalks standing to help preserve the soil from blowing.
4. We have planted over 100 evergreen trees in the past 4 years around my parents' house and our different hog confinements. Not only do these trees act as a great wind break but the grass we have planted around these trees helps hold the lighter soils in place from blowing. It also acts as great habitat for wildlife.
5. We currently side dress our nitrogen in the spring when the corn is roughly a foot tall, this allows us to use less nitrogen because we are giving it to the crop when it needs it most as opposed to applying it all in the fall after harvest and tillage.
6. One conservation practice that we are exploring more is variable rating our nitrogen. We currently do this with our phosphorus and potassium and we believe by doing this with our nitrogen it will not only cut costs but keep us from over applying nitrogen where the crop doesn't need any more.

As you can see our family farm is using many conservation practices. I know of many other farmers in our area that are doing the same. I don't believe it is necessary to have any more government regulations and laws when it comes to conservation practices. Andrew Davison

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #697.

Timestamp 1/14/2013 2:24 PM

**Name** David K. Moore

**City** Waterloo

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I am deeply concerned by the shortcomings of the proposed strategy, including the lack of common-sense standards to protect our waters, the use of voluntary standards that have failed to protect our waters in place of mandatory standards, the lack of time lines and detail on implementation of the proposed strategies.

The Strategy relies almost exclusively on voluntary measures instead of mandatory standards and regulations. These voluntary measures have failed to work in the past and have been shown in many other states to not work. The reliance on them shows either (a) a lack of understanding about what has and has not worked in Iowa and other states; (b) a lack of seriousness to propose plans that would address this serious set of problems; or both.

In addition, the proposed Strategy would place the financial burden not on the businesses that profit from their use of our waterways and practices that allow them to profit from dumping their nutrient problems on the rest of us, but on taxpayers. While taxpayers should reasonable share some of the financial burden, it is unreasonable to place the entire burden on taxpayers rather than having those who profit from the use of our waterways share in the financial burden.

There are some very reasonable, common-sense measures for some of the most harmful practices that would provide a great deal of the possible remedy for the nutrient problems we face. These are entirely lacking in the strategy, which dooms it to failure from the outset. These practices need to be meaningfully restricted if there is to be any hope of making progress on this issue.

There is a general lack of timelines or means of measuring progress (or lack thereof) in these proposals. There is also a lack of detail about how these measures will be implemented, what priorities will be pursued to implement these given limited resources to implement all of them immediately, and a lack of clarity about who will make decisions regarding priorities and timelines.

In brief, these proposals demonstrate a serious lack of good faith effort on the part of the administration, and the whole package needs to be sent back for reconsideration.

Thank you for your consideration.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #698.

Timestamp 1/14/2013 2:24 PM

**Name** Iowa Section American Water Works

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Monday, January 14, 2013

Iowa Department of Natural Resources

Chuck Gipp, Director

Wallace Building

502 E. 9th Street

Des Moines, IA 50319

RE: IOWA NUTRIENT REDUCTION STRATEGY

Director Gipp:

There are a number of groups within the State of Iowa that represent drinking water professionals. Many in the membership of those groups have one thing in common which is membership in the Iowa Section of the American Water Works Association (IA-AWWA). IA-AWWA is comprised of over 700 of Iowa's water professionals. Along with consultants and scientists, the group includes Iowa's drinking water utilities, from the largest in the state to the smallest.

I am the Director of Water Production for the Marshalltown Water Works, and also a representative of the IA-AWWA Water Utility Council. The Water Utility Council is the legislative committee of the Iowa Section AWWA.

We would like to offer our support to the newly proposed Iowa Nutrient Reduction Strategy. Our membership recognizes and respects the fact that nutrient reduction of Iowa's waters not only provides benefit to the people of Iowa, but to those of the entire nation. This effort, as proposed, includes all of the needed factors in the equation. The collaboration of point and non-point source contributors is an essential step in the right direction to provide the nutrient reductions that are necessary.

It is recognized that the goals of the plan are very ambitious; however, the direction that is being taken to involve professionals from the Iowa Department Agriculture, Iowa Department of Natural Resources, and researchers and scientists from Iowa State University demonstrates to our membership that the goals sought will continue to be science based which is of utmost importance. In today's world of increased public awareness, which brings the demands of accountability and verification with it, we respect the efforts that are being put in place to bring the right people to the table to effect the change that is needed. We appreciate that as those changes are implemented, consideration is also given to the investments of our rate payers that may be necessary. Science based standards are accountable, verifiable, and bring with them opportunities for innovative solutions. Solutions that will be necessary if Iowa is to meet the nutrient reductions required.

The Iowa Section AWWA Water Utility Council appreciates the opportunity to provide comment on this proposed plan, and is always willing to partner with the Department to find resolutions that our membership can support, and benefit our consumers, the people of Iowa.

Respectfully,

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 2 of comment #698.

Timestamp 1/14/2013 2:24 PM

**Name** Iowa Section American Water Works

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Tim Wilson

Iowa Section-American Water Works Association

Water Utility Council

Cc: Nutrient Reduction Strategy, online submission

Iowa Section AWWA Board of Directors

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #699.

Timestamp 1/14/2013 2:26 PM

**Name** Frank Cicciarelli

**City** Dubuque

**State** Iowa

**Providing comment on the following sections:**

<input type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input checked="" type="checkbox"/>	<b>Point Source</b>

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The Strategy as presented won't work. While point sources from cities accounts for only a small fraction of the overall N & P load it is the city citizens who are burdened with with penalty connected costly compliance. The plan for voluntary action on the part of nonpoint source landowners does not apply enough pressure to achieve the 45% reduction goal. I wonder if, eventually, there may be legal action by Iowa cities and/or the EPA.

We seem to be too insulated from our ethical responsibilities to the fishermen trying to "farm" the Gulf waters for their living. If they could reverse the flow of the Mississippi so that the poluted salty Gulf water came upstream and spread onto our farm fields so we could not grow corn & soy beans our action plan would be very different.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #700.

Timestamp 1/14/2013 2:27 PM

**Name** David K. Moore

**City** Waterloo

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I am deeply concerned by the shortcomings of the proposed strategy, including the lack of common-sense standards to protect our waters, the use of voluntary standards that have failed to protect our waters in place of mandatory standards, the lack of time lines and detail on implementation of the proposed strategies.

For agriculture, the Strategy relies almost exclusively on voluntary measures instead of mandatory standards and regulations. These voluntary measures have failed to work in the past and have been shown in many other states to not work. The reliance on them shows either (a) a lack of understanding about what has and has not worked in Iowa and other states; (b) a lack of seriousness to propose plans that would address this serious set of problems; or both.

In addition, the proposed Strategy would place the financial burden not on the businesses that profit from their use of our waterways and practices that allow them to profit from dumping their nutrient problems on the rest of us, but on taxpayers. While taxpayers should reasonable share some of the financial burden, it is unreasonable to place the entire burden on taxpayers rather than having those who profit from the use of our waterways share in the financial burden.

There are some very reasonable, common-sense measures for some of the most harmful agricultural practices that would provide a great deal of the possible remedy for the nutrient problems we face. These are entirely lacking in the strategy, which dooms it to failure from the outset. These practices need to be meaningfully restricted if there is to be any hope of making progress on this issue.

There is a general lack of timelines or means of measuring progress (or lack thereof) in these proposals. There is also a lack of detail about how these measures will be implemented, what priorities will be pursued to implement these given limited resources to implement all of them immediately, and a lack of clarity about who will make decisions regarding priorities and timelines.

In brief, these proposals demonstrate a serious lack of good faith effort on the part of the administration, and the whole package needs to be sent back for reconsideration.

Thank you for your consideration.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #701.

Timestamp 1/14/2013 2:33 PM

**Name** Clover Meade

**City** Decorah

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Voluntary measures have not worked so far!

There need to be a written plan with a timeline and consequences for slackers.

Why do the taxpayers have to pay for cleaning up the water when the people who create the problem aren't held accountable?



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #702.

Timestamp 1/14/2013 2:34 PM

**Name** Phil Klein

**City** Coralville

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

- 
- While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.
  - History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.
  - The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.
  - Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.
  - The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.
  - The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

**Name** Chris C Petersen**City** Clear Lake**State** Iowa**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

I am summerizing the plan overall as someone who has been involved in production agriculture all my life.

First of all a lot of farmers are true stewards of the land and the environment, but we need to do far more to get more farmers on board. Voluntary compliance falls far short to address what is going on, which are-

1)Iowa has lost 50% of its topsoil due to erosion. this alone should be unexceptable. This loss of soil is a national security issue(the ability to feed ourselves as a nation) and an economic issue starting with the best interest of the farmer- at the end of the day if you do not have enough dirt -you do not farm anymore and land has no value

2)Past experiance/ results dictates that voluluntary compliance has probably lessened pollution /runoff but has not kept ahead of the curve-we are still going backward. Proof of that is according to the latest documents Iowa has more impaired waterways than ever. So volutary compliance has failed and with proposed voluntary conservation of 23% how are any goals going to be achieved? Correlate that with probably a no go of mandatory conservation compliance in the farm bill tied to the subsidized 60% taxpayer writedowns in crop insurance we have an expanded problem....along with 70% of nitrates coming from agriculture!

3)Taxpayers, doing the right things have "annied" up billions in national and state iniatives over the years with unexceptable results- it's time the "bad actors" pay thru mandatory compliance and appropriate punishment. A lot of farmers have been unfairly treated (cost) for being good stewards while thier neighbors do nothing! We need to level the field by creating mandatory thresholds for all.

4)The volutary compliance argument is totally baseless- do we have "voluntary" speed limits, deer bagging limits, etc- we are a nation of laws. Negative results will continue with voluntary compliance when assessing the big picture. Half the farmers in Iowa spent "0" - this is a dishearting, while consumers pay higher utility rates to clean up the water and Iowa loses out in recreation spending.

5)Also, with the unchecked CAFO and acreage expansion this problem will only get worse. Throw in ongoing cronic soil erosion due to climate change, how much more damage, pollution and "voluntary compliance" compounded before Iowa wakes up?

6)Over the years agriculture has been exempt, but with agriculture changing and becoming more indutrialized with the blessing and protection by Farm Bureau and captured politicians, regulators /enforcers it's time for change. The game is buying time and keep doing what they're doing- making money, externalizing costs, and polluting.

7)Iowa is cetianly at a threshold here,a lot of citizens have lost faith and confidence in state government/DNR to execute a mandatory plan let alone a voluntary one with measurable results- taxpayer billions spent is not pocket change. It is time to live up to the Clean Water Act, have manadatory results on nutrient management,and stem soil loss (that carries nutrients).

Its has become very clear that if this state fails -

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #704.

Timestamp 1/14/2013 2:40 PM

**Name** Karyl Larson

**City** Iowa City

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #705.

Timestamp 1/14/2013 2:42 PM

**Name** Darcy Maulsby

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

My family farms in Calhoun County near Yetter, and I support a science-based, nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain a high-level of agricultural production.

I urge you to fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. My family has installed grass waterways on our land to prevent run-off and protect water quality. We are always looking for more ways to protect our precious soil and water resources that benefit not only our farm, but the surrounding environment.

I encourage you to fund the Iowa Nutrient Reduction Strategy. Thank you for your time and consideration.

Sincerely,

Darcy Maulsby Darcy Maulsby

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #706.

Timestamp 1/14/2013 2:42 PM

**Name** Jolene Riley

**City** Burnside

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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This problem is of a longstnding nature and has fallen on the deaf ears of those who could make a difference. It does not appear to be taken seriously until of a most critical nature. Please proceed post haste to protect ALL of us.

Thank you.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #707.

Timestamp 1/14/2013 2:43 PM

**Name** Vesna and Sonja Glavina

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I would like to note that the state's proposed strategy for reducing water pollution, while laudable in addressing water pollutions from cities and industry, is inadequate in addressing agriculture's contributions to the excessive nutrients in our water.

Relying on voluntary measures has a history of inefficacy. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

The strategy places the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

As it stands, this is a strategy for failure.

Thank you,

Vesna and Sonja Glavina

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #708.

Timestamp 1/14/2013 2:49 PM

**Name** Prescott Smith

**City** Fort Madison

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The strategies here, if that's what they are, are not feasible. They will not work. We must not rely on voluntary compliance of farmers. We see where this gets us in all other fields in which it has been tried. Industry has shown it will not police itself even to protect its own long term interests.

We need a program with research, data gathering, reporting, review and reaction to those who will not cooperate with real fines and seizures.

For the coming year, we know the persistent problems; end these now. Get hog confinement and chicken factories shut down along with corporate farms who are not complying with strict provisions set immediately.

As the droughts worsen, protecting our water becomes all the more important. Set effective controls now.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #709.

Timestamp 1/14/2013 3:07 PM

**Name** Luke Homan

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I would like to express my support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I ask that you adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to fund these programs in the past has delayed needed conservation projects.

Conservation practices are an important part of our farming practices. We have installed terraces and put in waterways to help prevent soil and nutrient loss. I hope we will have this opportunity to continue doing this in the future. I look forward to your support and thanks for what you do. Luke Homan



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #710.

Timestamp 1/14/2013 3:08 PM

**Name** Paul Talkington

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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This is no strategy for change but a license to continue current practices. It is far past time to get serious if we ever expect to make a difference. "Big Ag" will never do anything until forced. It is time for the legislature to actually represent the people instead of special interests with lots of money to finance campaigns. Necessary changes will not bankrupt anyone.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #711.

Timestamp 1/14/2013 3:13 PM

**Name** Travis Swehla

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

Also I urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

Voluntary conservation practices are better for our future than more regulations. Travis Swehla

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #712.

Timestamp 1/14/2013 3:17 PM

**Name** Doug Frey

**City** Cascade

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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It's January here in Iowa and farmers I know are spreading manure on frozen ground. "Where else I am going to put it?" they ask. Voluntary cooperation to reduce nutrient contamination of our waterways isn't a viable strategy. I'm wondering when we are going to get serious about runoff, erosion, and general degradation of the environment.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #713.

Timestamp 1/14/2013 3:23 PM

**Name** Eli Shepherd

**City**

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Recent research has proven that the voluntary approach has not resulted in any substantial decrease, certainly not to the recommended and essential levels, in nutrient runoff or agricultural pollution. Additionally it places no restrictions on some of the most polluting practices and the program is funded mainly by taxpayers, not those who are actually producing the bulk of the pollution.

We need specific timelines set for nutrient reduction and requirements of some sort in order to ensure they are met, the essential practices are implemented, and subsequently, enforced. This also brings up the need for a set method of tracking the actual nutrient reduction.

Voluntary measures are great and under most circumstances I'm all for them, but they just aren't producing the results that are so essential to the future of our land, waters, and people. Once we realize this is not just a water problem or a land problem but a human problem, then we will truly realize the necessity of requirements and enforcement. We need less pollution and not enough farmers are volunteering, we need to require these measures, for everyone's sake.

Thank you for your consideration, I appreciate your full consideration!

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #714.

Timestamp 1/14/2013 3:28 PM

**Name** Mark Morrissey

**City** Urbandale

**State** Iowa

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Thank you for the opportunity to comment on the Iowa Nutrient Reduction Strategy, (Strategy) released on November 19, 2012. United Services Association and its agricultural retail members congratulates the tremendous effort by the Iowa Department of Natural Resources, Iowa Department of Agriculture and Land Stewardship and Iowa State University. United Services Association supports the Strategy and encourages all Iowans, policy makers, farms, businesses and academia to embrace the draft and its implementation.

Cooperation from Point and Non- Point Sources:

This draft, for the first time, encompasses both point source and non-point source targeted reductions of both Nitrogen and Phosphorus. We are impressed that the urban and rural share common goals, despite differences in how the reductions are reached. While the Strategy focuses on 130 point source permits, the non-point sources are estimated to be around 90,000 farms. This difference requires executing cooperative, science based solutions from non-point sources as it is not practical to permit 90,000 farms.

Harnessing the collective rural effort:

Recently, many non-profit agriculture groups have been focusing on water quality generally and nutrient reduction specifically. The Strategy can become the road map for a coordinated effort from non-point sources and thus, for the first time, encourage similar goals and program objectives. This is critical to the success of the Strategy. Farms, rural agribusinesses and the organizations that represent them stand ready to implement the Strategy; we simply need to begin as soon as practical.

Consideration of multiple objectives; balancing water quality and food production:

Careful consideration should be placed with balancing water quality improvements with the production of food, fuel and fiber in Iowa. The Strategy balances those objectives by the well documented and thorough scientific assessment portion. We believe the scientific assessment is one of the strongest aspects of the Strategy and should be the basis for water quality improvement projects across the state.

Emphasis on Certified Crop Advisers:

The Strategy highlights a previous untapped resource, Certified Crop Advisers (CCAs). Iowa is home to over 1,000 CCAs who advise farmers on a myriad of soil quality and nutrient management issues. Many CCAs work directly with agriculture retailers to develop and implement field practices. The use of these trusted professionals will be critical in implementing the Strategy.

Sincerely,

Mark Morrissey

President, CEO United Services Association

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #715.

Timestamp 1/14/2013 3:41 PM

**Name** Casey Schomaker

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I feel that the state should fund the Iowa Nutrition Reduction Strategy. Farmers know what's best for their land. This will help benefit them in the future. Casey Schomaker

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #716.

Timestamp 1/14/2013 3:47 PM

Name Mike McGill

City

State Iowa

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

Thanks for your consideration.

Mike

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #717.

Timestamp 1/14/2013 3:53 PM

**Name** Joe Turner

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

The strategy is a science and technology based approach developed by the Iowa Department of Agriculture and Land Stewardship (IDALS), the Iowa Department of Natural Resources (DNR), and Iowa State University (ISU) to encourage the adoption of voluntary conservation practices that will have the greatest benefit for water quality in the state. It uses ISU research to determine which practices are most effective when applied to Iowa's unique landscapes. The strategy outlines these efforts in a scientific, reasonable and cost-effective manner. Joe Turner



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #718.

Timestamp 1/14/2013 4:08 PM

**Name** Rosemary Partridge

**City** Wall Lake

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I have lived for the past 35 years in the Raccoon River Watershed and on Carnarvon Creek that is the main water source for Iowa's most southerly glacier formed lake - Lake Blackhawk. The North Raccoon River drains an area of intense agricultural use. It is extremely impaired with silt run-off leading to algae growth, high bacterial counts, cyanobacteria, and other impairments. I routinely warn people to avoid body contact with the river as it leads to eye infections and worse. Blackhawk Lake is also an impaired water body and is right now undergoing a massive effort to reduce siltation and phosphorus pollution. This is a voluntary effort with extra money being targeted to land use practices. It is not the first time that this kind of an effort has been put forth. The effort will have good results no doubt but if the past is to teach us anything those land practices will gradually have their contracts run out and it is doubtful that they will be renewed. The price of grain and the price of land dictate more and more land being intensively farmed and thus voluntary practices just can not keep up. The land use practices that I witness on surrounding farmlands are enough to break a conservationists heart. Iowa land is a world treasure that with present land usage practices is more and more under threat. The voluntary agri-business written guide lines for non point nutrient reduction are not nearly enough to stem the tide of topsoil loss and water degradation. Voluntary measures won't do - certainly we need strong regulations to protect both land and water.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #719.

Timestamp 1/14/2013 4:20 PM

Name Jack Burrignt

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support the fact that there needs to be farmer compliance of the proposed Nutrient Reduction Strategy, but I am not sure that voluntary compliance will get the job done. They say that one size does not fit all, which is true, but when you go to the shoe store not everybody buys the same size shoe. There are different sizes for different people's feet. I think the same theory can apply to the conservation practices. The practices can be tailored to the various farms as not all farms across the state are the same. I am not really in favor of more government control of what the farmers can do, but I have seen too many instances when voluntary compliance did not work. Therefore I think that only voluntary compliance doesn't work there should be a backup plan to force compliance where there is evidence that the farmer has not taken steps to reduce nutrient runoff. I see too many examples of where farmers have taken out structures installed to reduce runoff or eliminate practices that were implemented to reduce nutrient runoff. Complete voluntary compliance will not work. Jack Burrignt

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #720.

Timestamp 1/14/2013 4:21 PM

**Name** Dr.Wesley F. Buchele, Agriculture

**City** 239 Parkridge Circle, Ames

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                               **Point Source**

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Between 1951 and 1955, I, Dr. Wesley F. Buchele, Agr. Eng. conducted research in cooperation with Prof. E. V. Collins and ARS., US Dept of Agr. Agricultural Engineer Walter G. Lovely. We developed the System and the Equipment for the Ridge-Till Sustainable System of Conservation Tillage. The theory of the system is the contoured ridge-rows (Every Row is a Contoured Terrace) will hold and infiltrate the rain water that falls on the land. Contoured ridges will in-pond two and one-half inches of water on the surface of the land and hold it while it infiltrates into the soil. The Acreage of Ridge-Till increased to about 6 million acres in Iowa and Minnesota before No-Till became popular. There are about our million acres of Ridge-Till farming yet today in Iowa and Minnesota.

In water run-off and erosion tests conducted by Lovely and Moldenhower, They found that the erosion from 6% slope from a plow based system of farming was 5 tons of soil and only one fourth of a ton of soil per acre when all rows run up and down the slope. Of course, the ridge rows are normally laid out on a one-half percent slope to the grassed water way instead on u and down the slope. The title of my thesis is Ridge Farming and Plant Rout Environmental. ISU Library. Telephone:515.292.2933 I have this is power-point.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #721.

Timestamp 1/14/2013 5:03 PM

**Name** Nancy Forrest

**City** Winterset

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Water quality in IA is unacceptable. Sediment levels, vulnerability to flooding, and recreational usability of our rivers and streams is still alarming. How can we expect that continuing to do more of the same thing with our land and the water that makes crop production possible but expecting different results will work for the water in Iowa, much less for the water that we send to the Gulf of Mexico?

Furthermore, the data cited in this report and the algorithm used to predict outcomes, does NOT include the installation of millions of miles of field tile, the function of riparian and wetland areas, or the retirement of millions of CRP acres fueled by the high prices of corn and soybeans. Nor is there data based upon alternative cropping rotations that involve crop years of legumes, native plants, cover cropping and green manure, and small grain crops. Therefore, the data are incomplete and the predictions unreliable.

Finally, to use smog as an analogy, who could argue that a sane response to the problem would be to leave improving air quality up to the VOLUNTARY efforts of the diverse industries which cause smog. Yet that's what this report advocates for the industry primarily responsible for the unrelenting reality of the Gulf dead zone. Water treatment systems, whether corporate, residential, or municipal are subject to legally regulated practice. Farms must also be regulated.

Farmers, for the most part, understand the need to "feed the factory." Without healthy soil, crops don't grow. However they, like any other consumer at the mercy of every other corporate advertising department, must sort the facts from the fiction while trying to make a living in a highly competitive world. Ethical farmers who have the integrity to do what's best will seek education and answers available from independent science. Not everyone has the time or the expertise to do that. Regulating farming water quality and soil conservation practice using knowledge garnered from independent science will make farming easier for the farmer while actually improving the water quality here in Iowa AND the water quality downstream. The results will be quickly observable and won't require debate or a lobby.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #722.

Timestamp 1/14/2013 5:10 PM

**Name** Brian Young

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

We need to fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed many needed conservation projects. Brian Young

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #723.

Timestamp 1/14/2013 5:11 PM

**Name** Ron Mussmann

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #724.

Timestamp 1/14/2013 5:13 PM

**Name** Allison Castle

**City** Muscatine

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

Polluted runoff from farmland is having serious effects on Iowa's drinking water please enact a strong policy for public health and the protection of our rivers and streams.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #725.

Timestamp 1/14/2013 5:20 PM

Name Lee Huntrods

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

10 years ago I purchased 43 acres of ground that had never been farmed. 50% of this ground could be farmed today with minimal input to bring the acres into production. Instead I have planted 6,000 trees and shrubs to bring back and expand the Burr Oak Savannah. This ground will act as a Green filter that allows the land to heal itself from sediment and chemical enchoachment; providing clean and adequate water for producers and consumers downstream from my farm. Yes this is a farm. I just chose to explore alternate agriculture. I am currently negotiating on two other properties to expand conservation.

Allow other nutrient strategies to work. Allow funding that will adequately provide benefits. The best time to plant a tree was yesterday. The best time to put your faith in the American farmer is today. Lee Huntrods



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #726.

Timestamp 1/14/2013 5:21 PM

**Name** Donald West

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I urge you to adequately fund the Iowa Nutrient Strategy and other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

Help us farmers become better stewards of the land while maintaining our agricultural production. Donald West

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #727.

Timestamp 1/14/2013 5:32 PM

**Name** Brian Feldpausch

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I want to express my support for the voluntary Nutrient Reduction Strategy in Iowa. The state needs a program that allows all groups to continue to implement voluntary strategies and science-based strategies to reduce pollution.

On our farm voluntary strategies have created buffers, improved water ways, and built manure management structures and animal housing facilities.

I also urge the state legislature to fully fund a voluntary implementation strategy. These do work. The NRCS's EQIP program is a great example of a voluntary program that has helped producers "do the right thing". Brian Feldpausch

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #728.

Timestamp 1/14/2013 5:32 PM

**Name** Jesse Singerman

**City** Iowa City

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Please do more to protect Iowa's waters and our watershed. Voluntary approaches do not work. Government needs to step in and regulate this issue in a way that restores our natural resource base. Property rights don't extend to polluting and destroying a resource we all need to live. Farmer's should pay for the clean up not taxpayers. They are the polluters. If that means higher costs for food so be it. I am willing to pay my share that way. No more free rides for large farming interests.

Iowa State government is failing in its duty to the state to deal with issues like this that only the government can deal with. This isn't a strategy it is a way to do nothing.

Jesse Singerman

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #729.

Timestamp 1/14/2013 5:35 PM

**Name** Steven Anderegg

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am writing you to day to urge the state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

This is an item that we are all working for and the farmers in this state will continue to work to ensure conservation for many years to come. On my own farm we have implemented grassed water ways and riparian buffers to ensure that no nutrients enter our water supplies as point source pollution.

With the states help we can continue to increase conservation efforts and protect our natural resource of productive farm soil. Steven Anderegg

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #730.

Timestamp 1/14/2013 5:39 PM

**Name** Michael Recker

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would like you urge you to consider supporting the Iowa Nutrient Reduction Strategy. This is an important topic that I believe needs to be a grass roots approach. As agriculture develops, it seems like there are more and more costly regulations. Trying to police rules and regulations could cost more than an incentive program that could work better for the farmers and for the environment.

On our own farm we are enrolled in the CSP program through FSA. This program allows us to voluntarily monitor our nitrogen use. The program also encourages us to use things like Auto-shut offs for sprayers, and Auto-steer to help more accurately apply fertilizer and chemicals. Michael Recker

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #731.

Timestamp 1/14/2013 6:24 PM

**Name** Aaron Schnepel

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I hope you will support the Iowa nutrient strategy. It will be the best way to approach this need farmers will do their best to continue to take the best care of our water possible. We will use whatever help and technology we can to keep doing our best on my farm we use terracing and farm ponds to keep our soil and nutrients home we don't want to lose any of our black gold. The strategy is the best way to continue this so please fund this Aaron Schnepel

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #732.

Timestamp 1/14/2013 6:32 PM

**Name** Greg Miller

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

---

Secretary of Agriculture Northey,

I support a science based state nutrient reduction strategy. Please adequately fund the Iowa Nutrient Reduction Strategy and other cost-share programs. Greg Miller

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #733.

Timestamp 1/14/2013 6:33 PM

Name Judith Gaul

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

Please support voluntary conservation practices such as the Hewitt Creek project, grass waterways, and checking soil needs. Farmers would rather have a voluntary rather than a forced law. We need scientific strategies and funding for an Iowa Nutrient reduction strategy. Maybe the Iowa Farm Bureau and other organizations such as the Corn Growers Association could send out information as to implement better practices. Some farmers already are using safe practices but a reminder doesn't hurt. Judith Gaul



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #734.

Timestamp 1/14/2013 6:51 PM

**Name** Jesse Green

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I support doing a science based state nutrient reduction strategy that emphasizes voluntary efforts to conserve nutrients and maintain ag production. Fund this strategy and the other conservation programs.

Our farm has over 40 acres of wetland acres seeded off and we have volunteered to do multiple waterways. There is always more to do and our farm will for sure continue to do everything we can in our conservation efforts. I know many other farms that think the same way we do.  
Jesse Green

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #735.

Timestamp 1/14/2013 6:57 PM

**Name** Ben Van Sickle

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I would like you as lawmakers to properly fund a program for the Iowa Nutrient Reduction Strategy. It is my responsibility as a farmer to properly care for the soil and water(that my family consumes each day). We as Iowa farmer want to stay on top of this Strategy, so there is no penalties in the future. I myself, work hard on conservation practices, such as sediment basins, grass waterways and minimized conventional tillage. We are always adapting new and also improved farming practices each day for soil and water quality. So please help by implementing funding programs to assure this matter will be controlled in the future. Thank you Ben Van Sickle

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #736.

Timestamp 1/14/2013 7:04 PM

**Name** Patsy Bronner

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy. I feel that voluntary conservation practices are effective and used by producers to protect their valuable soil. If cost-share programs are adequately funded it will encourage conservation programs to proceed without delay. We currently utilize grassed waterways, contour strips, minimum tillage, and crop rotation that includes hay and small-grain. These practices have significantly reduced erosion from water and wind on our farmland. Patsy Bronner

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #737.

Timestamp 1/14/2013 7:20 PM

**Name** Brady Hanson

**City** Castana

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I hope that when New POLICY is being made that they use some science based technichs because if they dont it is just another loophole that is open for someone in a power position to shove down people throats there is enough mistrust as it is,good science is good business

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #738.

Timestamp 1/14/2013 7:31 PM

**Name** Edwin Townsend

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Iowa needs a well funded nutrient reduction strategy coupled with adequately funded conservation cost -share program to reduce nutrient run off. On our family farm we use ,terraces,grass filter strips, crop rotation & reduced or no-till to accomplish this. Edwin Townsend

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #739.

Timestamp 1/14/2013 7:53 PM

**Name** Justin Faber

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would like you to support and fund a voluntary conservation program. I think that most farmers do conservation friendly practices on their own already. I am a member of our conservation board and on the local pheasants forever committee and the funding for these programs are important to the environment.

I know on our farm we use filter strips and also have put sensitive areas in CRP. We are also starting to use strip till to place the fertilizer in a more efficient location. Justin Faber

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #740.

Timestamp 1/14/2013 7:54 PM

**Name** Patrick Bosold

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

---

The state's proposed strategy recommends strict new rules for cities and industry, but it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

We have far too much evidence that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels. It is time to change this imbalance.

The state Plan includes an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, but the state plan recommends no minimum standard of care that farmers should follow.

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy. This needs to be a part of the final Plan.

The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #741.

Timestamp 1/14/2013 7:56 PM

**Name** Paul Pingel

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would like to share with you my support of developing a science and technology based method of an nutrient reduction plan. This is the most sound way of solving the problem. We cannot just accept a long list of regulations without having some sort of good scientific data behind them.

Thank You Paul Pingel



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #742.

Timestamp 1/14/2013 8:06 PM

**Name** Paul Gerlach

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am writing in regard to the nutrient reduction strategy. I feel it is very important for voluntary conservation practices and the need for funding to help implement these practices.

We have worked with the NRCS office to put in two tling basins and one total containment structure. These were able to be built with the help of cost share funding.

We also have plans to do streambank stabilization in the future. We feel we are voluntarily doing our part to benefit our farm and the surrounding environment. Paul Gerlach

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #743.

Timestamp 1/14/2013 8:08 PM

Name Robert Maass

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

---

Secretary of Agriculture Northey,

Since agriculture and agricultural businesses are the economic engines that have kept this state running, it is up to you, our state lawmakers and Secretary of Agriculture, to respect the scientific research that has gone into the nutrient reduction strategy and support it!

Experience is the best of teachers, and today's producers are the most conservation minded in history. But with higher taxes and more regulations business decisions must be made for the survival of the family farm.

Please support and adequately fund the Iowa Nutrient Reduction Strategy and other cost-share conservation projects.

Thank you. Robert Maass

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #744.

Timestamp 1/14/2013 8:24 PM

**Name** Troy Wheeler

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am a southern Iowa farmer that uses field border buffer strips and contour buffer strips to help control erosion and nutrient loss. I also support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I hope that lawmakers adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. Troy Wheeler

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #745.

Timestamp 1/14/2013 8:54 PM

**Name** Linda Schrader

**City** Chariton

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

---

While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #746.

Timestamp 1/14/2013 8:54 PM

Name David Pingel

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices. This science-based strategy is needed to maintain agricultural production in Iowa. The Iowa Nutrient Reduction Strategy needs to be adequately funded along with the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. These projects are needed to maintain a sustainable agricultural system in the state of Iowa. Not only for the current generation but for many generations to come.

My family farm has implemented numerous conservation practices. We have added buffer strips and grass waterways where needed. We have left some of our best land in pasture and hay that could easily be planted to row crop. Most of the land is near a creek so the grass filters any runoff including some from the surrounding roads. We have implemented these conservation practices to benefit the future of our farm. I would like to have the chance to one day let the next generation farm this land. My family has farmed in this area and some of this land for over a century. I hope my family is able to farm it for the next century.

These practices also need to be used in urban areas too. For instance, I lived in Ames Iowa for over 10 years. I know of several instances where lawns received enough fertilizer to produce more than 100 bushels of corn per acre. The lawns were way over fertilized but the owners wanted a green lawn. If there was a large rain all the excess fertilizer ran in the storm drain and eventually right in the river. I am not trying to pick on urban areas like Ames. However, I think EVERYONE needs to use sensible and sustainable conservation practices to help conserve soil and water.

Thank you for your time and efforts to help maintain agricultural production in the state of Iowa. I would like to reiterate my support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices. David Pingel

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #747.

Timestamp 1/14/2013 8:56 PM

**Name** Bob SyWassink

**City** Letts

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I appreciate all the time and efforts put into this study.

I have been and continue to be supportive of voluntary conservative methods in order to meet the goals stated. I am opposed to having big government making decisions of what is best for farming operations and how we feed and fuel the world.

I am somewhat concerned with the timing of the study and the above normal levels of rainfall during some or all of the study timeframe. In contrast with the last season with such a shortage of rainfall. Weather has such an impact on fertilizer plans which a farmer makes as he prepares his fields for the next crop.

I remember a couple of years ago talking with a farmer that planned to apply his N in the spring and was unable to because of the amount of rain and softness of the fields. His decision to spring apply N that year that he missed because of the rain, had a big negative impact on his yields.

Farmers want to grow their crops economically and in environmentally friendly fashion. Applying excess fertilizer cuts into his profits and is not wise. I already use or have tried most of the practices discussed or recommended such as no-till, spring applied nitrogen, variable rate fertilizer application, side dressing nitrogen, cover crops.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #748.

Timestamp 1/14/2013 9:08 PM

**Name** Gary Woodley

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I am urging you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

In order to help reduce leaching and erosion, I use grass waterways and reduced-till and no-till. Gary Woodley

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #749.

Timestamp 1/14/2013 9:12 PM

**Name** Denyce Rusch

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I am very concerned about the proposed strategy for controlling pollution from crop fields. I have worked as an IOWATER volunteer and greatly value Iowa's water quality. But also, our large scale farming practices have an impact not only in our own rivers and streams, but all the way into the Gulf of Mexico. We have a responsibility to our whole country to get this right. The current proposed strategy has great weaknesses that need to be addressed:

While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

It is vital that we put some teeth into this strategy, or we will continue to grow the Gulf dead zone, and Iowa taxpayers will pay for an inefficient policy. Please let us actually make some progress and show Iowans to be the concerned world citizens we are.

Thank you.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #750.

Timestamp 1/14/2013 9:29 PM

**Name** Paul Vaassen

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would ask that you would adequately fund the Iowa Nutrient Reduction Strategy and other conservation cost-share programs. It is important that we support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices.

We have had a conservation program on this farm for over 65 years. We contour, strip crop, rotate crops, and have pasture between the cropland and the creek that runs through the farm.

We firmly believe in conservation practices and the need to protect the environment. Paul Vaassen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #751.

Timestamp 1/14/2013 9:34 PM

**Name** Matthew Beran

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

We are doing our part to keep our streams clean by stacking our manure during the time the ground is frozen and applying when it can be incorporated in less than 24 hours. Just using common sense goes a long way. Matthew Beran

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #752.

Timestamp 1/14/2013 9:36 PM

**Name** Allen Kramer

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I think farmers are already doing many things to reduce nutrient loss. I use conservation tillage, I have 3 diferent types of conservation reserve acres, and I apply nitogen at several different times during the growing season. I use stabilizers and put on what the crop needs. It is to costly to over apply. We need a sound science proven based approach. It needs to be a voluntary. We have proven time and again that we can change our farming practices to meet the current issues. We need to be able to maintain agricultural production and build on it to be able to feed the world. We need you to support and fund the Iowa Nutrient Reduction Strategy and the other state conservation cost share programs.  
Allen Kramer

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #753.

Timestamp 1/14/2013 9:40 PM

**Name** Carol Tripp

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

As a Marshall County resident and farmer, I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

Please fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

We are currently incorporating no-till practices into our farming operation. In the future we intend to install water conservation sources for livestock and plant cover crops to save nutrients and reduce wind and water erosion. Carol Tripp

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #754.

Timestamp 1/14/2013 9:45 PM

**Name** Jason Edwards

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Hi, I'm writing you in support of the science based nutrient reduction strategy. It seems like everyone rushes to make quick changes and in the long run it was simply bad policy.

What we need is a commitment to conservation programs! It's a shame the marginal and highly erodible land is getting plowed up and planted and will still barely make a crop! Land like this is probably what's sending the most pollution down stream. Let's get this land back into cleaning our water ways! Jason Edwards

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #755.

Timestamp 1/14/2013 9:45 PM

**Name** Larry Verdoorn

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I am sending this brief note to urge you to fund the Ia Nutrient Reduction Strategy and other conservation practices. I have terraces, filter strips, and grass waterways on the farm I own and am therefore familiar with what can be done. I am confident that the science based approach we're proposing is the correct way toward reducing nutrient losses. Larry Verdoorn

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #756.

Timestamp 1/14/2013 9:52 PM

**Name** Gary Bickmeier

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I urge you to support a science-based Iowa nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

Please support legislation that will adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

Thanks for your efforts in this matter.

Gary Bickmeier Gary Bickmeier

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #757.

Timestamp 1/14/2013 9:59 PM

**Name** Clarence Larson

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I urge you to adequately fund the Iowa Nutrient Reduction Strategy. So it can help use as Farmer's cut your Nutrient losses and still get good crop yields. I have started to use variable rate fertilizer on some of my farms to see if I can cut some of my nutrient loss . Clarence Larson



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #758.

Timestamp 1/14/2013 10:20

Name Mike Fara

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Iowa needs to be proactive with a flexible, yet effective Nutrient Management Plan before the EPA sends us one. I believe the proposal from ISU, DNR and IDALS would be so and yet is based on sound science. The agricultural industry implements new technology faster than most industries based on the economic incentive to do so. With the voluntary conservation strategies proposed Iowa farmers would be quick to implement them hopefully foregoing any new regulation in the future.

I urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs to avoid any delay in their implementation.

Iowa farmers are becoming more efficient at what they do to feed a growing world population. On my farms I use no-till farming as well as terraces, grass waterways and field borders to conserve the soil for my son and grandsons. I urge you to approve a plan like this one that will make a difference in Iowa's water quality without regulating us out of business. Mike Fara

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #759.

Timestamp 1/14/2013 10:22

Name Christopher Nelson

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please support a voluntary, logical, science-based nutrient reduction strategy that farmers can economically and effectively participate in to improve water quality in our state. As a farmer, I fear the imposition of an inflexible mandate that does not account for local dynamics and individual producer's livelihoods in an effort to implement conservation measures on farms across the state. I am concerned that the state will adopt a one-size-fits-all program as has been done in the Chesapeake Bay area, which is like trying to drive a square peg into a round hole; what works for one farm does not necessarily work on another farm. As a farmer, I truly want to do my part to better utilize our nutrient resources and maintain the integrity of our state's waters--I share the same water you do and I want it to be of the highest quality possible. However, greater farmer acceptance and participation will be gained through voluntary programs and fully funding conservation programs. On our own farm, we have been no-tilling since the late 1980's; utilize waterways, filterstrips, and tile; terraces; soil testing; paddock & rotational grazing systems; and just this year we are experimenting with cover crops. We have done so voluntarily and will continue to evaluate and implement practices that show positive results and are economical to implement on our operation. Also, programs like the low-interest loan program for conservation structures have been highly popular and well-received in our area. Please work to protect our independence and develop sound programs for farmers in our state. Christopher Nelson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #760.

Timestamp 1/14/2013 10:38

**Name** James Dannen

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please support volunteer efforts toward nutrient strategy. James Dannen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #761.

Timestamp 1/14/2013 10:38

**Name** Shasta

**City** West Des Moines

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #762.

Timestamp 1/14/2013 10:42

**Name** Mike Fara

**City** Irwin

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Earlier this month I attended the Shelby County Farm Bureau meeting. Our Regional Manager had invited Tom Buman, of Agren, to demonstrate new software his company developed. The software develops plans for conservation practices like waterways, wetlands, and ponds. In a matter of 20 minutes Buman completed two pond estimates upon the request of one of our board members. I have never seen anything quite like this software. Buman showed several options for each location and was able to show an aerial view of the structure and pond and calculate the cost of the pond in a matter of minutes.

In all of the years of working with USDA and IDALS employees, I have never been shown any method that can give so much information to a landowner so fast. If NRCS and IDALS ever even hopes to provide adequate technical assistance to Iowa farmers and landowners, they need to start using this technology across Iowa. This software could save countless hours of valuable time, for NRCS staff and landowners as well. It could be a very effective tool to help farmers protect Iowa's water.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #763.

Timestamp 1/14/2013 10:44

**Name** Dave DeJong

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

We need to do the voluntary nutrient management plan.

We can not have the

feds come in and force us to do a one size fits all plan!! Lets take the bull by the horns, and fund these programs, not doing so will cost farms and the state much more money in the long term. Dave DeJong

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #764.

Timestamp 1/15/2013 2:14 AM

**Name** nita garvin

**City** West Des Moines

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

/

History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

/

The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #765.

Timestamp 1/15/2013 2:43 AM

**Name** Rachele Matteucci

**City** Pistoia (PT) - ITALY

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Policy**

**Nonpoint Source**

**Point Source**

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While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #766.

Timestamp 1/15/2013 3:12 AM

**Name** Silvia Hawkins

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #767.

Timestamp 1/15/2013 4:30 AM

Name Matt Raasch

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing to you in support of a nutrient reduction strategy that recognizes voluntary conservation practices. Adequate funding of this and the cost - share programs help to reduce the delay of needed conservation projects.

We take pride in implementing these types of conservation practices on our farm. We have installed terraces and grassed waterways. The cost share programs for the structures make it feasible for us to use such practices. We also use no till farming on critical acres of our farms. Most recently we are using more variable rate application of nutrients on our crop land to reduce wasteful and costly over application of crop nutrients. By doing this we apply only the nutrients that the crop will use in a particular growing season. All of these efforts reduce the excess that causes pollution of our natural resources. Matt Raasch

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #768.

Timestamp 1/15/2013 4:30 AM

Name Rob Cousins

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

The drought that farmers went through this last year shows how varying soil types need to be managed differently. These soil types varied across counties, roads, and even across the same field, that's why voluntary conservation practices fit for the need of nutrient reduction strategy. The best person to implement a plan for farmland is the one who knows that land the best. Our farm has a lot of sandy areas and we plant these fields with rye in the fall after corn silage is harvested. We want to protect the soil from wind and water erosion throughout the winter and the rye is utilized in the spring by cows grazing it off as they calve. Rye also adds organic material to the soil as it is tilled. Corn is planted after the rye is grazed and a lower rate of fertilizer is used. Nitrogen is the only fertilizer used and at a rate of 100 units per acre. This is an example of what we do now on a voluntary basis to help our soils. Nutrient Reduction Strategy needs to be funded fully as a proactive approach to conserve Iowa's greatest asset, its productive farmland.

Length : 1087 Your code has been sent! Rob Cousins

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #769.

Timestamp 1/15/2013 4:30 AM

Name Klint Cork

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

As a farmer I understand the need for conservation that keeps our soil nutrients available for healthy crop production. I believe that my abilities are measured by my capability to feed the world which requires me to maintain a productive environment where nutrients and soil are kept in place and leaching and erosion are reduced. I personally have used many practices such as terracing, grass waterways, conservation tillage, grass buffers, along with many others to hold my nutrients where they are needed for my efficient crop production.

I support the need for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge you as our state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy. Iowa's failure to adequately fund conservation programs in the past has delayed the implementation of many more needed conservation projects. Thus, I also request that you provide funding for conservation practices that preserve our great Iowa assets.

Farmers know better! We have dedicated our lives to maintaining a healthy environment. Thus, as a farmer I would like to continue to be part of the solution, but I know that new regulations aren't the answer.

Thank you for your support of Iowa! Klint Cork

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #770.

Timestamp 1/15/2013 4:40 AM

Name Beth Jones

City Monticello

State Iowa

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

Thank you for this opportunity to comment on the Iowa Nutrient Reduction Strategy.

As you well know, far too much nitrogen and phosphorous are applied to our soil in a stupid and unsustainable effort to turbo-charge it to grow more, more, MORE.

This toxic excess flows from agricultural land into Iowa's rivers and streams, triggering dangerous algae blooms, endangering public health and is a major cause of the tragic "dead zone" in the Gulf of Mexico. All because we place too much trust and power in Big Ag (whose only priority is profit, NOT public health) and not enough in Mother Nature (whose wiser priority is sustainable, self-regulating balance).

So why does the strategy proposed by the state do so little to address such grave problems? You and I both know that, next to clean air, clean water is absolutely essential for good health. So Iowans want our water protected -- and informed (and thus outraged) citizens want to know WHY your agency's strategy so unwisely fails to make any real effort to do so.

I'm glad that the state's proposed strategy at least recommends strict new rules for cities and industry, but in my opinion, it is imperative that we address and curb agriculture's irresponsibly high contributions to the excessive nutrients in our water. For example, an accompanying science assessment outlines the well-documented effectiveness of a number of conservation practices that farm businesses can implement immediately, but the state plan neglects to recommend a minimum standard of care for farmers to follow.

I also cannot support the strategy's continuing, seemingly cynical reliance on farmers taking voluntary measures, when 40 years of this approach has done precious little to fix this serious and growing problem. That you see fit to include it in the current, toothless strategy is troubling.

In addition, your strategy needlessly puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at every level.

In my opinion: THE POLLUTERS MUST PAY. Our farmers sign iron-clad contracts with Monsanto, Cargill and their ilk, which force them to apply excessive amounts of fertilizer to their crops. (Big Ag's other dangerous, but profit-boosting demands endanger us and other species, e. g. bees, but that's for another agency.) Monsanto and all the other  better-living-through-chemistry propagandists need to finally start paying back some of those handsome profits (ill-gotten gains) their reckless policies have poured into their bottomless pockets to help clean up the mess they and their selfish business tactics have made!

If a farmer doesn't follow Big Ag's profit-mongering contracts to the letter, he gets his pants sued off by big corporate lawyers --- even when the farmer is trying to protect his farm and others by using better, more sustainable practices. NO MORE  the makers of these fertilizers and pesticides ad nauseam should be sued instead, for forcing farmers to poison our soil, air and water and making the rest of us deal with the toxic consequences for our health!

In short, your agency's strategy as proposed takes baby steps to solve a giant and still growing problem. Please take it back to the drawing board and THINK BIG -- but not Big Ag! They've been allowed to use Iowans of all species as their guinea pigs for far too long. Dial  em back to realistic and environmentally responsible levels for once and let farmers TAKE CARE of our nation's breadbasket and the rich soil and water that fill it  the last thing we should do is continue to exploit these assets like slave labor!

Thanks for your time and consideration of my comments.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #771.

Timestamp 1/15/2013 5:52 AM

**Name** Lance Bell

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I would like to encourage you to fully fund the Nutrient Reduction Strategy that has been proposed. This along with other cost share measures for conservation will continue to keep Iowa agriculture at the forefront of trying to protect the environment.

We have continued to build what terraces we can afford even though cost share money has not been available. We have landlords that have done the same as they want to see improvement but don't want to wait and miss good opportunities for construction. Not all the projects can be built in one season which means we need a constant stream of funding. Lance Bell

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #772.

Timestamp 1/15/2013 6:41 AM

**Name** Kriss Haglund

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am writing to ask that you support a nutrient reduction strategy that is based on real science, not untested ideas, or theories, and that they are kept completely voluntary. Demand for our ag products remains high, and is only sure to increase. A plan that carelessly cuts our use of fertilizer will threaten our ability to meet these rising needs for food and fiber.

Please work to fully fund this strategy, and keep it voluntary.

I have worked to reduce the amount of applied nutrients by applying nitrogen in the spring, versus fall application, utilizing a more frequent and extensive soil testing plan, and maintaining and improving field borders and waterways. Driving around the country, it is obvious that many of my neighbors are doing the same. Please don't saddle us with more regulations. Thank You Kriss Haglund

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #773.

Timestamp 1/15/2013 6:51 AM

**Name** Dennis Gratz

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I am writing to you to ask you to support a science-based state nutrient reduction strategy.

I am a farmer in Van Buren Co. We have built many terraces and waterways in the past years to help improve the quality of water here in Iowa. We would like to do more, however the list of producers requesting conservation costshare funds far exceeds the availability of the funds. This results in huge delays to the water quality improvement that we could see if there were more funds available.

A voluntary, science based approach, that leverages producers dollars would be the best approach given the huge differences in terrain from one area of Iowa to another. I would greatly appreciate your support in advancing this program. Thank you. Dennis Gratz



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #774.

Timestamp 1/15/2013 7:30 AM

**Name** Elizabeth Bredeson

**City** West Des Moines

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I have read through the proposal and am dismayed that such an important issue (to Iowa and much of the nation affected by Iowa's practices) could seriously be deemed resolvable by voluntary practices.

Agriculture is an important business in Iowa. Voluntary measures will NOT level the playing field; we can not expect that businesses will make decisions that could negatively impact their profits, knowing that other businesses are NOT making those decisions. It simply hasn't happened in the past, nor will it happen in the future.

We need a strategy that outlines specific goals, steps and legislation needed to reach those goals, and a timetable with identified measurements. We need monitors who are not politically appointed nor aligned with industries.

The long-term health of our groundwater, our state's soil (a most valuable asset) and downstream states is far too important to be considered a "voluntary" issue.

Yes, there will be some pain and that pain should be distributed. Non-farming taxpayers in Iowa certainly should have a stake and some skin in the game, and so should farmers and agricultural companies who do business in Iowa.

Please review the proposal and revise to show a good faith effort at truly resolving an issue with long-term impacts. I hope the lessons from the dust bowl era and the current crises in water shortages across the United States serve as notice that we must take this seriously.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #775.

Timestamp 1/15/2013 7:56 AM

**Name** Lauren Van Wyk

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I read an article in the Farm Journal magazine yesterday that quoted Secretary Vilsack saying that farmers and there lobbies need a proactive message and to quit bickering about overregulation. Instead we should contribute to a new vision for agriculture. I think this voluntary aproach to using science and research to find ways to improve water quality in Iowa would be that proactive vision that he was talking about.

I encourage you to help and support this Nutrient Reduction Strategy in any way that is neccessary to make it possible to do the research, so that information can be shared with other farmers and put into practice. Lauren Van Wyk

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #776.

Timestamp 1/15/2013 7:56 AM

Name Mitchell Zumbach

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

As a producer and a supplier of crop inputs to agriculture I have experience on both sides of the fence. The voluntary practices that farmers have been using are based on the science and research from our Universities and Commodity Groups. They use the best input to return equation for their operation. Inputs such as fertilizer are too expensive to waste on land that does not require high rates.

The voluntary conservation practices that farmers already use are a good indication of self policing. No producer wants to see the soil washed down the streams and rivers. I myself have stream buffers that were placed long before conservation programs came into effect to cost share these projects. The education of farmers to use these on a voluntary basis is priceless. Mitchell Zumbach

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #777.

Timestamp 1/15/2013 8:22 AM

Name Ronald Goecke

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I write in support to adequately fund the Iowa Nutrient Reduction Strategy as well as the state's other conservation cost-share programs.

While some agricultural producers seem lax in implementing certain conservation practices, it is recognized that many voluntarily go ahead with the idea of conserving the soil and maintaining water quality.

I also have the mindset that promotes the above issues as I have installed terraces, built a pond (1981) with a silt pond presently under construction, and I am planning to install buffer strips in the near future. I have also been a no till farmer for several years.

Proper legislation to promote voluntary conservation practices that will include some funding would help the cause for nutrient reduction in our waterways. Ronald Goecke

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #778.

Timestamp 1/15/2013 8:29 AM

**Name** mark gjerde

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I as a Iowa farmer support a science base state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy , as well as the state's other conservation cost share programs mark gjerde

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #779.

Timestamp 1/15/2013 8:32 AM

**Name** Larry Rowley

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Iowa State University has the ability to produce science-based recommendations for a voluntary state nutrient reduction policy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

But the state has not fully funded the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. By not funding these conservation projects has delayed the desired results.

We borrowed money last year to build a needed pond to control runoff, cleaned out ponds, repaired waterways and built more terraces. Only part of the terraces were constructed with government funding. We VOLUNTARY use no-till, GPS variable fertilizing and continually are added terraces to control soil erosion. If Government funding is available, farmers will voluntarily install and use conservation measures to improve water quality. Larry Rowley

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #780.

Timestamp 1/15/2013 8:35 AM

Name David Van Rheenen

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I wish to express my support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge you as state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

Having won local awards for conservation activities in the past I know the importance of Buffer Strips, riparian strips, terraces and waterways. We are currently looking at new practices to be put into place on several fields this year and spent several hundred dollars of our own to maintain existing practices. Your vote will help us maintain a long standing tradition of conservation and sustainability. David Van Rheenen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #781.

Timestamp 1/15/2013 8:42 AM

**Name** David Ballou

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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To not take more definitive and proactive policies, especially in the face of the current drought and potential environmental change, is irresponsible.

The state's proposed strategy falls short in many ways:

It relies entirely on the same voluntary approaches for agriculture that have failed to clean up Iowa's water.

It puts the bulk of the financial burden on taxpayers, even though profitable farm businesses are responsible for the bulk of the problem.

It fails to set any common sense standards to restrict a handful of the most polluting farming practices.

The strategy outlines no timelines, interim goals or means of measuring annual progress toward reducing agricultural pollution.

It includes no explanation of how the plans will be implemented, how problems will be prioritized or who will make these decisions.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #782.

Timestamp 1/15/2013 8:47 AM

**Name** Heather Schachtner Kramer

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices. My Father, my Grandfather, and his Father before him all practice/practiced voluntary conservation efforts because they love/loved their land. We utilize a program that we have native grasses and flowers growing all around our farm. The pheasants love it, as do other birds and animals.

Please understand, as a land owner, we want to take care of it for future generations of our family to make a living from. Why would we want to hurt it" As farmers, we do not want to have to spend more per acre than necessary, so most are frugal with what they put on and when.

Please adequately fund the Iowa Nutrient Reduction Strategy as well as the state's other conversations cost-share programs. Heather Schachtner Kramer

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #783.

Timestamp 1/15/2013 8:51 AM

**Name** Mary Mcknight

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I strongly support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge you as a state lawmaker to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

As an independent producer I have implemented numerous cost share programs such as grass water ways, terraces and rotational grazing.  
Mary Mcknight

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #784.

Timestamp 1/15/2013 8:57 AM

**Name** Grant Dixon

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support the science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. I urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. I believe that these conservation practices are extremely important to the future generations of Iowa agriculture. Thank you. Grant Dixon

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #785.

Timestamp 1/15/2013 9:06 AM

**Name** Jessica Osterberg

**City** Newton

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #786.

Timestamp 1/15/2013 9:12 AM

**Name** David Meyer

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy. I feel a voluntary approach to conservation practices are important. While some of these conservation practices need to be taken on by the farmers themselves, funding for the more expensive practices are needed. I hope that the state lawmakers will keep that in mind as conservation projects are delayed from inadequate funds. David Meyer

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #787.

Timestamp 1/15/2013 9:21 AM

**Name** Eric Woodford

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am writing this in support of a science based nutrient reduction strategy for our state. In Iowa we place a high value on our natural resources and the private landowners here know that all will benefit from good stewardship. It needs to be voluntary and it needs to maintain production levels.

Please fund this strategy and other important cost share programs because our valuable resources are at stake and cannot be put on hold.

People are eager to make a change for the better all they need is the proper tools. Please help us get these tools. Eric Woodford

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #788.

Timestamp 1/15/2013 9:33 AM

**Name** Jason Franck

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support the science based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agriculture production.

Please adequately fund the Iowa Nutrient Reduction Strategy. Jason Franck

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #789.

Timestamp 1/15/2013 9:35 AM

**Name** Keith Weller

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

---

Secretary of Agriculture Northey,

Please continue to past legislation that just plain makes good sense for the best interests of agriculture in mind. Also keep the farmer involved with that decision process. Thanks. Keith Weller



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #790.

Timestamp 1/15/2013 9:38 AM

**Name** Jennifer Cash

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please support and adequately fund the Iowa Nutrient Reduction Strategy as well as the state's other conservation cost-share programs.

It is important that we support this science-based nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. Jennifer Cash

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #791.

Timestamp 1/15/2013 9:41 AM

**Name** Susan Retz

**City** Anita

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The strategy being recommended to protect Iowa's waters is a start, but while the state's proposed strategy recommends strict rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

The agriculture industry is the main polluter in Iowa, yet the state strategy puts little responsibility on the industry itself. The financial burden is on the taxpayers instead. In addition, relying on voluntary measures will likely be ineffective. (On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.)

Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

And finally, the strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

It's time to take real measures, rather than provide more talk to pacify the public opinion.

We all require clean water to support life itself. What is so difficult about requiring those who pollute our waters to be responsible for and held to stopping the damage?

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #792.

Timestamp 1/15/2013 9:45 AM

Name Matthew Willimack

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing today to ask for the legislations support for Iowa's Nutrient Strategy. As a grain farmer I sincerely support this science based nutrient reduction strategy. On our family farm we employ a multitude of conservation practices based on different topographies and soil types already and many of these practices will likely be part of this voluntary program. My point is we are already do things to conserve the land and this strategy will help measure the benefits of those current practices.

I urge you as lawmakers to adequately fund this program which is one time money that could come from our current budget surplus. Also using one time money to fund Iowa's Cost share programs that has lacked funding in the past. This too will help help fund conservation projects already planned that have been inadequately funded.

Please take time to consider these funding opportunities that will help keep our state's largest industry continue to be a leader in the world not only in production, but land stewardship. Matthew Willimack

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #793.

Timestamp 1/15/2013 9:51 AM

**Name** Roger Dreeszen

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I believe it is very important that rules and reg-

ulations be carefully thought out and enacted only after careful consideration and

investigation. This does appear to be the process

followed in this affair. I urge all involved in this

process to take into consideration all facts presented and to use common sense in arriving at

a solution! Roger Dreeszen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #794.

Timestamp 1/15/2013 9:56 AM

**Name** Brian Walshire

**City** Rowley

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Voluntary approaches will not work it is just a way to kick the can down the road and protect farmers and business from doing any meaning full reduction. No common sense standards will be used for the pollutants that are the most common from farming practices. The proposed strategy, which is really no strategy at all, could be better done by most Jr. High School science classes. The state plan lays out no timelines, interim goals or means of measuring progress. The financial burden is put on the taxpayers and expects us to contribute to farmers cost at all levels. This is no strategy and has already been shot down by the federal government as it should be. Maybe we should let a Jr. High class come up with a strategy... certainly would be money better spent. Sincerely, Brian Walshire

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #795.

Timestamp 1/15/2013 10:14

**Name** Randy Brincks

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I believe it is very important for a state nutrient reduction strategy and it to offer voluntary conservation practices that will help maintain agricultural production. I have taken advantage of several opportunities for my operation. I have completely eliminated any manure run-off from my cattle. I feel it is beneficial to me, as well as, the environment that I was able to secure funding to make this possible. I am also better managing my manure hauling practices and have buffer strips along water tributaries.

These practices are very important and I urge you to fund the Nutrient Reduction Strategy, as well as other conservation cost-share programs so that others can continue to improve the state's water quality. Randy Brincks

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #796.

Timestamp 1/15/2013 10:31

**Name** Anna Myers

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. Anna Myers

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #797.

Timestamp 1/15/2013 10:32

Name Kevin Schechinger

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I would like to see your support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. I believe farmers know better! They want to continue to be part of the solution, but they know that new regulations aren't the answer. I also would like to see a hard effort by all of our lawmakers to address this and other situations with no earmarks. Kevin Schechinger



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #798.

Timestamp 1/15/2013 10:33

Name Dan Hanrahan

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing to express my support for the state nutrient reduction strategy.

Historically, somewhere along the lines, instead of everyone raising their own food, someone raised food for someone else, and civilization followed. It increasingly seems civilization now demands for agriculture to follow it at times. Part of this is entirely understandable, but some of those demands are best summed up in C.S. Lewis' quote: "In a sort of ghastly simplicity we remove the organ and demand the function. We castrate and bid the geldings be fruitful."

As the world's population continues to grow, we have a moral obligation not only to grow food for those people, but to produce it as cheaply as we can do responsibly.

It is hard to say that our current system has failed us, when the current system has not been adequately funded. And while I fully understand the problems that exist across the board in funding, the funding for our conservation programs are relatively cheap compared to some funding request out there. Cheap not just in terms of cost, but also in terms of reward. What funds the legislature makes available, there is a list of private individuals willing to match those funds and further drive value.

Even with inadequate funding, both as producers and in our family business of doing earthwork, us and our neighbors yearly build conservation structures on our own dime. Just this year, for our own operation, we've installed a pond and five terraces, in addition to the one pond we've built on our own with cost share funding. Next year we have slated several more terraces to install for ourselves on our own dime.

Just like everywhere else, one's dollars can only go so far. Adequately funding the cost share programs would accelerate tremendously the work that will get done.

"When tillage begins, other arts follow. The farmers, therefore, are the founders of human civilization," so said Daniel Webster. I can only hope, should agriculture be able to continue to build on their own legacy of conservation, perhaps civilization will also follow that lead, one which places no expectation of government doing everything to solve the problem, rather, only their assistance. Dan Hanrahan

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #799.

Timestamp 1/15/2013 10:33

**Name** Sheri McCann

**City** Marshalltown

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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- While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.
- History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.
- The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.
- Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.
- The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.
- The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #800.

Timestamp 1/15/2013 10:45

**Name** John T. Torbert  
**City** West Des Moines  
**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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First of all, I congratulate the state agencies involved in the preparation of this document. It is obvious that it involved a huge effort to bring it to the point of publication.

Much has been made about the voluntary vs. regulatory approach to the issues involved. As Executive Director of the Iowa Drainage District Association, I want to go on record strongly in favor the voluntary approach. The world's population is growing and individuals who study these trends agree that Iowa will be expected to play a bigger and bigger role in feeding the world. The amount of land in the state is limited and that which if farmed is actually decreasing. The net result of this is that farmers will have to squeeze additional productivity out of the land that they have. Anything that erects regulatory barriers to the ability to raise crops and livestock will only serve to decrease productivity.

The IDDA believes that the non-regulatory approach recommended by this document is the correct one.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #801.

Timestamp 1/15/2013 10:47

Name Bradley Moeckly

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

Nutrient management in Iowa agriculture is critical for the healthy well-being of our state, as well as the economic impact that it has on those of us involved in agriculture. It is very important for us as farmers to have acute awareness of the impact that we are having on the environment and to voluntarily keep those around us informed of what we are doing. It is also important that we base these efforts on scientific studies, such as those from Iowa State University, and abstain from emotional responses. Personally, I go to great lengths to monitor soil fertility by soil testing every 5 acres of row crops. All manure is injected to prevent erosion. If we are to continue to make this state a leader in agriculture production, we MUST work together! Bradley Moeckly

**Name** Nate Kemperman**City** Ames**State** Iowa**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

First of all, a big thanks to all involved in writing and researching this document. It is critically important to our state and the entire Mississippi River Basin to make substantial improvements in reducing our runoff. I have 4 basic points after a brief introduction.

My life has been infused with conservation-mindedness since I can remember. My father worked for IDNR in forestry for many years and my mother had a master's in environmental education. Now, I help run a volunteer-based non-profit vegetable and fruit farm near Ames. We are buying our farm and expanding to 11 acres. At least 4 acres of that total will be committed to conservation, specifically related to easing runoff from neighboring conventional cropland. We believe in volunteerism and would do everything we could without government financial help. However, if timing and funds allow, we do hope to use EQIP to help with our field border project. Why? Public funds make sense because our conservation improvements benefit much beyond our farm. In fact, I believe the the primary benefit is beyond our farm. That is why all us farms, big or small, conventional or organic, grain/livestock/fruit-nut-vegetable, have an utmost responsibility to work towards maximizing conservation.

Point 1, then, concerning the Nutrient Reduction Strategy, is that farmers need more support, both financial and advisoral, for voluntary compliance to work. This should mainly come out of the public sector, for I distrust the impact of profit motive from the private sector. For example, Iowa State Extension should be mentioned more in the strategy and the service expanded. Perhaps also we need an Agro-ecology Department to help the farm sector in conservation expansion.

Point 2; I agree regulation is complicated and potentially burdensome, but there is smart regulation that is essential, because it helps us farmers do the right thing. Furthermore, judging by many of the local farms I see around, I believe that voluntary compliance with the goals of the Strategy will only get us so far and, if Strategy goals are not met within a certain few years, conservation compliance should become mandatory. This framework should be included in the Strategy. We need a better timeline with a sense of urgency and the threat of mandatory compliance and enforced penalties. I wish it wasn't so.

Point 3 is for the Strategy to outline better how we will monitor improvements in lessening nutrient runoff. We need to know how its going. I didn't get a clear idea of that from the 1st 2 sections. It is mentioned, but needs to be forefront and detailed.

My last point regards the awkward and confusing writing style in the 2nd section. This is especially the case on page 11 in "Challenges of Best Management Practice Adoption to Address Nonpoint Sources." It is very hard to follow. The argument is not clearly written. That section is important for it deals with fertilizer application rates, but the logic to arrive at the conclusion that application rates are an untouchable factor just doesn't add up. At best, it just confuses the point. It seems to me better application can improve the situation (at the end of the section, increased production rates with less fertilizer is touted) and, given the uncertainty of the weather and our changed landscape, it is one area we can effect. For instance, timing and amount of manure application is undeniably a critical consideration. Finally, perhaps we should consider that optimum production is not necessarily a sacred goal. Maxing production levels can bring lessing value to other parts of our lives, and I believe I'm understating that.

In tying this comment up, let me just add that I also strongly encourage the Strategy to take up the suggestions of the EPA letter to Gipp and Northey from Jan 9th. I found much in that letter that made good sense. Also, thanks for inviting comments and extending the comment period. I think the Strategy is a great idea and is off to a good start. I look forward to helping make its impact be as great as possible and evolve in a positive way.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #803.

Timestamp 1/15/2013 10:55

**Name** Gregory Bastian

**City**

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #804.

Timestamp 1/15/2013 11:21

**Name** Marilyn Wingert

**City** Spirit Lake,

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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It is unbelievable to me that we allow farmers to pollute field after field with poisonous fertilizers because after a rain, these horrible poisonous fertilizers seep into our public water sources and pollute our own individual farm wells. Isn't there something that can be used that will NOT poison field after field for miles and miles?.....Years ago the farmers used manure from cows, horses, or pigs to spread on their fields & my Grandpa told me that manure really makes the "corn grow tall"!

Probably nothing can be done to stop this "poisonous progress" that is practiced by the enlightened farmers of today's world, but I just keep hoping that somewhere, somehow and sometime this horrendous poisoning of our water supply will stop.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #805.

Timestamp 1/15/2013 11:21

**Name** Marilyn Wingert

**City** Spirit Lake,

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

---

It is unbelievable to me that we allow farmers to pollute field after field with poisonous fertilizers because after a rain, these horrible poisonous fertilizers seep into our public water sources and pollute our own individual farm wells. Isn't there something that can be used that will NOT poison field after field for miles and miles?.....Years ago the farmers used manure from cows, horses, or pigs to spread on their fields & my Grandpa told me that manure really makes the "corn grow tall"!

Probably nothing can be done to stop this "poisonous progress" that is practiced by the enlightened farmers of today's world, but I just keep hoping that somewhere, somehow and sometime this horrendous poisoning of our water supply will stop.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #806.

Timestamp 1/15/2013 11:22

**Name** Randy Dreher

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

As a farmer who voluntarily cares for the environment, I am in favor of funding the Iowa Nutrient Reduction Strategy as a means of protecting our water and natural resources. The science-based plan provides guidelines that help farmers do what is right for their own operation while meeting public desires to minimize environmental impacts. On my farm, I know the land and what practices work to help attain the goals set forth in this plan better than anyone else. That is why it is important to steer clear of rigid regulations that may not fit my situation/operation. Please provide the necessary funds to help make the Iowa Nutrient Reduction Strategy successful. Randy Dreher

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #807.

Timestamp 1/15/2013 11:25

**Name** Alison Wasielewski

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Iowa's water pollution involves so many problems. Factory Farming, Pesticides, Organic standards, Amoral Political representatives, and the weakness of human nature which typically puts individual self-interest above public and environmental health. All I can say is the pristine quality of our water supply should always be of primary importance.

WATER IS LIFE!

Alison Wasielewski

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #808.

Timestamp 1/15/2013 11:28

**Name** Steve Kunert

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support a science based state nutrient reduction strategy Steve Kunert

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #809.

Timestamp 1/15/2013 11:34

**Name** Alex Krueger

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

It is in every farmers best interest to reduce nutrient runoff on their farm. Some of the projects on the farm can become costly, so I think keeping a well funded cost share program in place will help as well as anything to encourage farmer to act. If only we could stop the 4" rains that come in twenty minutes then all our problems would be solved. Alex Krueger

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #810.

Timestamp 1/15/2013 11:49

**Name** Marilyn Wingert

**City** Spirit Lake,

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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How can we stop the pollution of our drinking water and farm wells? Why do farmers of today insist on using highly poisonous fertilizers that seep into the public water sources and private farm wells? My Grandpa told me the he used cow & pig manure on his fields because he said that it really makes the corn grow tall!

How can such an "enlightened farmer" in today's world live with himself when he spreads field after field with POISON in the form of fertilizer? You would have to be a bit "brain-dead" not to know that when the rains comes along, the water seeps into the ground taking particles of poisonous fertilizer with it into our water sources... Sooner or later we drink that poison....

How can this poisonous pollution be stopped?... Better yet, why isn't it stopped?

Well, I can make a wild guess maybe.... Could it be that the rich powerful fertilizer companies do a great job of convincing the farmers to keep spreading the fertilizer poisons so they can get rich????

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #811.

Timestamp 1/15/2013 11:54

Name Joe Ledger

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

I am contacting you in regards to the Iowa Nutrient Reduction strategy. The state of Iowa has made significant progress in soil and water conservation in recent years. Soil erosion is down 33% from 1982 and pesticide levels are declining in streams in the corn belt. I have voluntarily used no-till and minimum till practices along with other farmers to reduce soil erosion. I have installed miles of terraces and filter strips to reduce run-off like other farmers. In my operation I have installed tile-terraces, grassed waterways and filter strips along streams. In the last 2 years I have used cover crops to protect vulnerable soils on steeper slopes.

Therefore, I urge lawmakers to adequately fund the Iowa Nutrient Reduction Strategy as well as the states other conservation cost-share programs. Voluntary participation is more appealing than regulations by government Joe Ledger

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #812.

Timestamp 1/15/2013 11:54

Name Keith Johnson

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am asking you to support funding the Iowa Nutrient Reduction Strategy. I am a very typical farmer, we prefer to have incentives to do our best than rules and regulations to keep us from doing our worst. IDALS, the DNR and Iowa State University developed the Iowa Nutrient Reduction Strategy by using modern day science and technology.

I'm currently using no-till, inject hog manure and will be tiling and water way reconstruction hopefully this year. I believe these practices will help protect our water quality and reduce soil erosion. I believe funding the Iowa Nutrient Reduction Strategy will help farmers implement practices that work without having more regulations. Keith Johnson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #813.

Timestamp 1/15/2013 12:01

**Name** trina ridgway

**City** eldon

**State** iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #814.

Timestamp 1/15/2013 12:02

Name John Christensen

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing to urge you to support an Iowa Nutrient Reduction Strategy that not only controls and reduces nutrients that pass out of Iowa via rivers and streams but which will improve farming practices to benefit all aspect of soil and water management. Make it be  local to Iowa  , voluntary (with local oversight and incentives  you can  t refuse ), and with minimal involvement by the Feds above the county Farm Service Agency. I constructed a ten acre pond five years ago despite the negative efforts of the Army Corp of Engineers in Rock Island and the EPA in Kansas City and am totally  fed up with the bureaucrats above our local level. Local support was positive and helpful. John Christensen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #815.

Timestamp 1/15/2013 12:05

**Name** Kevin Stender

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I would like to express my support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary practices and the need to maintain agricultural production.

I also urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs.  
Kevin Stender

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #816.

Timestamp 1/15/2013 12:06

**Name** Mathew Thome

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I wanted to express my support for science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. I urge you to adequately fund conservation cost-share programs because inadequate funding has delayed needed conservation projects in the past. Mathew Thome

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #817.

Timestamp 1/15/2013 12:13

**Name** Dave Bolin

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I'm asking for your support of a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

Funding this voluntary program as well as conservation cost-share programs can help us protect our farms and the rest of the environment.  
Dave Bolin

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #818.

Timestamp 1/15/2013 12:17

**Name** Dennis Heemstra

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices. On our farm I have switched from conventional tillage to vertical tillage. This type of tillage reduces run-off and erosion. It leaves much more residue on the surface with only disturbing the top inch or two of soil. We have also added CRP waterways to a couple of our farms where water ran to a tile outlet. That should help nutrient run-off.

We also need to adequately fund the Iowa Nutrient Reduction Strategy and other state cost share conservation programs. Dennis Heemstra

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #819.

Timestamp 1/15/2013 12:18

**Name** Duane Ohnemus

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would like to urge your support of a voluntary, science based approach to the Iowa Nutrient Reduction Strategy. Farmers care about the environment because our business depends on it. A voluntary, well-funded program will work best. Duane Ohnemus

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #820.

Timestamp 1/15/2013 12:25

**Name** Mark E. Wagler

**City** Pulaski

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I am truly fearfull that all these herbicides are killing off our wildlife and contaminating the soil giving us higher cancer rates here !! The quail and small bird population is gone from these chemicals . Our 2 lower tier countys Davis , and Vanburen countys are plaqued with cancer too !!! Mark E. Wagler

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #821.

Timestamp 1/15/2013 12:36

**Name** Julia Babinat

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would like to take the time to encourage the adoption of the proposed voluntary conservation program. The Nutrient Reduction Strategy Fund and other cost share programs will allow farmers the opportunity to make a good fit for their farm. I myself am trying rye cover crops through EQUIP but is underfunded at this time for cost-share. Cost is an issue. Please help!

Julia Babinat Julia Babinat



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #822.

Timestamp 1/15/2013 12:42

**Name** Gary Langbein

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**  **Nonpoint Source**  
 **Policy**  **Point Source**

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Secretary of Agriculture Northey,

I think you guys know that farmers want to do the right thing for their farms and the environment. I have no-tilled my HEL farms for several years and have installed many terraces and waterways. I feel cost share is one of the best ways to "prod" farmers to start these practices. I also feel that the NRCS needs to be careful about how much fertilizer they make us put on these terraces and waterways. They usually recommend a very high amount. In short I want to stress the importance of cost share for nutrient reduction. Gary Langbein

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #823.

Timestamp 1/15/2013 1:03 PM

**Name** Kristy Trentz

**City** Dubuque

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Thank you Mr. Chuck Isenhart for your concerns and help with this very passionate topic for me. I am a kayaker and scuba diver and love the Oceans and every body of water. I believe it is so important for our survival to keep the waterways clean and safe for everyone and every living being. I had an experience last summer paddling from the Mississippi into the Catfish Creek and suddenly realized it was in feces! The smell was horrendous and I was astounded at this! I know farming runoff is a huge problem as well. Thank you again for all your help and efforts! I wish more understood the problem and how all bodies of water lead to the precious Oceans

Sincerely

Kristy M. Trentz

**Name** chris C Petersen**City** Clear Lake**State** Iowa**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

Being involved in production agriculture all my life it has become apparent voluntary nutrient management is failing society and has become a major issue of high importance in this state's future. We have got into this mess for various reasons that need immediate addressing. The framework proposed has been a failed policy except big money moving from taxpayers to others with unexceptable results. Some accountability is needed and more issues seem to just get left behind.

1) We need a balance struck between all citizens in this state. Voluntary compliance does not achieve that goal, just like voluntary speed limits on our roads do not.

2) A lot of farmers are true stewards of the land but some are not- this creates unfairness in the system. With 70% of nutrients coming from agriculture we need all farmers involved through mandatory compliance-period!

3) We again see in a just released document Iowans have more impaired waterways in this state than last year. Also, 1/2 of the farmers spent "0"- which challenges the integrity of voluntary compliance immediately.

4) Iowa has lost 50% of its topsoil over the last several decades. At what futuristic point does a farmer become "unsustainable" due to soil loss? This is a social / producer / economic issue and a national security issue as per retaining the ability to feed ourselves into the future as a nation. Also, when soil moves -so do nutrients- no one benefits...except for the agricultural industry who loves to sell massive amounts of crop production products.....

5) With chronic erosion and climate change events compounding the problem of nutrient retention it will only get worse. Also, with the unchecked expansion of acreage and under-regulated CAFO's voluntary compliance looks like a feeble attempt.

6) While good actor farmers have spent time and money, taxpayers have "annied" up billions over the years, this state is more polluted than ever and has nothing to brag about...regardless of what Farm Bureau says. Also, we need to realize a new farm bill will probably not have a mandatory compliance clause to all farmers receiving 60% taxpayer funded writedowns in crop insurance premiums...and some believe voluntary compliance achieves goals and solutions.?.hogwash- lipstick on a pig!!

7) Iowa should be ashamed of being 50 of 50 in water quality and getting worse. Iowa agriculture has become more intense and industrialized over time while Farm Bureau and others have captured enough politicians, state government and its oversight / regulatory / enforcement system ( example of Farm Bureau policy in these DNR / Iowa State proposed nutrient management documents) to make it irrelevant...while taxpayers pay higher taxes, higher utilities....and citizens suffer health impacts and less economic /recreational choices due to dirty water. The game of Farm Bureau and their friends is more of the same - status quo- suck the money out of a subsidized taxpayer funded system ( with NO mandatory requirements) while externalizing costs, making money, and polluting. How many more years of "voluntary" compliance before the people / voters of this state wake up??...enough is enough...

8) It's time we get serious, voluntary compliance is doomed to fail. Citizen faith, trust, and confidence with politicians and the DNR to execute a voluntary nutrient management plan- let alone a mandatory one is questionable. More of the same will not cut it anymore...especially when EPA is knocking on the door.

9) Above all the citizens of this state deserve along with the farmers who are doing the right things deserve a better outcome than what has been achieved and proposed. The economic future and human health deserves and depends on mandatory compliance with teeth ...just like speed limits

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #825.

Timestamp 1/15/2013 1:40 PM

**Name** Dan Harrison

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I hope you will support the science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. Dan Harrison

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #826.

Timestamp 1/15/2013 1:54 PM

**Name** Dean Berte

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please support voluntary efforts for conservation, we don't need more farm regulations.

I would support limiting lawn fertilizer in towns across the state knowing that much ends up in stormsewers. Dean Berte

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #827.

Timestamp 1/15/2013 1:54 PM

**Name** Liz Queathem

**City** Grinnell

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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"Voluntary regulation" is an oxymoron. Iowa will not have clean water, and take responsibility for reducing its contribution to the dead zone in the Gulf of Mexico, until it truly regulates agricultural pollution.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #828.

Timestamp 1/15/2013 2:00 PM

**Name** Kenneth Wade

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I urge you to support a voluntary science-based state nutrient reduction strategy. I would also urge Lawmakers to fund a Nutrient Reduction Strategy along with other conservation cost-share programs.

As a member of the Agriculture community I take the responsibility of voluntary conservation practices seriously. Just a couple of the steps I have taken; include buffer strips along streams (I have two on my property) that are fenced off to keep cattle out of the streams and, soil testing of pastures on an annual bases to apply only the amount of fertilizer required to maintain maximum nutrient value(s) for livestock production.

I feel voluntary participation to implement a Nutrient Reduction Strategy will be far more effective than more regulations. Kenneth Wade

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #829.

Timestamp 1/15/2013 2:14 PM

**Name** Vance Bauer

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would like to make some short comments on conservation. On our farm we have implemented buffer strips along ditch banks, have reduced nitrogen application to about half per bushell than when I began farming, are using gps to apply fertilizers and chemicals to prevent overlapping and application where nutrients are not needed, and have currently signed up for cover crops for the next two years. We are trying very hard to be as enviromental as possible and would encourage you to support our voluntary science based practices and to fund them appropriately. Thank you very much for your time Vance Bauer



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #830.

Timestamp 1/15/2013 2:15 PM

Name Rene Paine

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Dear State Officials,

In regard to the concern about water pollution from run-off, please consider the following:

While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

I ask that you take these things into consideration and come up with a more thought-out, conscientious plan. Thank you for your time and attention.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #831.

Timestamp 1/15/2013 2:37 PM

**Name** Steven Leazer

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

We already have enough regs to help with these issues already. I there's problems getting them implemented put some incentives to get them solved. Steven Leazer

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #832.

Timestamp 1/15/2013 2:50 PM

Name John Siefkas

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

It is very important to me that we do not allow more regulations on farms which could be very costly to farmers. I support the science-based state nutrient reduction strategy that recognizes the importance of VOLUNTARY conservation practices. And yes, we need to maintain a good strong and safe agricultural production.

I intend to pass my farm on to my children and why would I want to pass on something that I don't take care of to the fullest extent. I am careful to not allow topsoil to wash away because that is where the living is made. I drink rural water and I don't want my chemicals and fertilizers in the drinking water, and besides they are too expensive to just be negligent and allow them to wash away too.

I practice contour farming and keep my waterways in good condition as a buffer to stop top soil and its nutrients from escape. No government official or lawmaker in an office in the capital has any idea what my farm needs. I do! I farm it. More government regulations create more cost and more problems.

So please fund to some extent conservation cost-share programs to help farmers with conservation projects but do not add any more government regulations to the conservation program.

It might do well to look in other directions for some of the culprits of the runoff problem. Farmers as a general rule want to take care of their soil. However, there are many city dwellers who have free rein with herbicides and pesticides for their small plots of yards and driveways and overuse these chemicals just for cosmetic purposes which when multiplied by the millions of users can and does create a huge contribution of chemicals to the water sources. Let's regulate the usage of chemicals in the cities that easily run off of the concrete into the storm sewers.

John Siefkas

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #833.

Timestamp 1/15/2013 2:59 PM

Name Eddie West

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please do not allow the IPA to burden our farmers with untold numbers of federal regulations that will not only add to the cost of farming, but will put personal emotional burdens on them as well. Yes, we need to conserve our soil now more than ever, but we also need to be sensible about it. Good farming begins with good planning. Please do everything possible to promote Iowa Nutrient Reduction programs.

Also don't forget the use of uncontrolled chemicals in the small towns and cities by people who have no training and no education on their side effects. These thousands of users also contribute to the chemical levels in the streams and rivers.

At least farmers have more at stake in making use of conservation plans to protect their land. Eddie West

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #834.

Timestamp 1/15/2013 3:03 PM

**Name** Richard Rosenmeyer

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

You should fund the voluntary conservation strategy Richard Rosenmeyer

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #835.

Timestamp 1/15/2013 3:12 PM

Name Curtis Wilson

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would just like to say that a science based nutrient reduction strategy that is voluntary would be the most appropriate means of implement conservation practices for one not all farm ground and soils are the same so its hard to tell a person with flat ground he has to conture farm and farm in the hills cant be disk ripped so everyone has to develop their own plans according to the farm and the equipment he has because if you force people in to things its no different then enforcing a very high priced tax on to a lot of people that would be bankrupted by such measures and I now that most farmers will and do implement things that help but in their own way and time.

I also urge you to fund this program as well as other cost share programs because many farmers myself included will be way more inclined to install such practices when we can afford them. Right now my landlord has a budget of so much money every year so when there is a program to help it makes installing the practices go that much futher every year. For example with out state cost share waterways I would have alot of ditches erouding their way through my fields even though I contour farm and rotate crops these help but its only part of the puzzle to improving the farm Curtis Wilson

**Name** Dennis Keeney**City** Ames**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

Response to the proposed Iowa Nutrient Reduction Strategy

Dennis Keeney

Emeritus Professor, Iowa State Univ.

Former Director, Leopold Center of Agriculture

January 15, 2013

Iowa has over 36 million acres of land, and over 90% of this land is in agriculture. About 14 million acres are in corn, and 8.5 million acres in soybeans, with amounts varying depending on markets and weather. So on a given year, about 2/3 of Iowa's agricultural land is in annual row crops. As we know from decades of research and demonstrations, wind and water erosion from row crop lands is notoriously difficult to control. Soil erosion primarily by water, exceeds by several times the rate of reforming of the top soil, a trend that has continued since the state was first converted to annual agricultural crops. This eroded soil contains pesticides and phosphorus that causes algae growth and leads to rapid loss in surface water quality. The waters flowing through the soil contain nitrate that causes health issues with Iowa's drinking water and is directly linked to the increasing rates of hypoxia occurring in the Northern Gulf of Mexico.

A just released scientific study by a team headed by Dr. John Downing, a noted ecologist at Iowa State University, also showed that Iowa lakes are being filled with the eroded soil (sediment) at an accelerating rate despite the widespread soil conservation efforts. Alarming, the rate of accumulation is increasing, to more 4 times the rate in 1900. It now takes only about 4 years for an inch of sediment to accumulate, which is the equivalent of about 50 dump truck loads of soil each year in each lake in Iowa. (The study can be accessed at Iowa State University News Service and was published in the peer-reviewed journal PLOS ONE.)

Control of the runoff and leaching from Iowa's cropland has failed. It is not for lack of knowledge or well-meaning efforts. Indeed, this was the main reason the Leopold Center for Sustainable Agriculture was established by the Iowa General Assembly in 1987. The Center has in conjunction with many Iowa research and educational units sponsored leading research on nutrient reduction strategies including the Bear Creek Watershed (the poster for many erosion control studies in Iowa) and the nationally acclaimed Long-term study shows many benefits of longer rotations), another study published in the peer-reviewed Journal PLOS ONE.

There are many economic and social reasons for the failures of Iowa agriculture to protect its soil base and water resources. The huge number of moving parts mean focusing on one area is doomed to failure.

Let me recall the merry-go-round of activities over the last 35 years.

In 1989, the Iowa Fertilizer and Chemical Association stated common belief that soil erosion will be controlled because of the 1985 Food Security Act that requires cross compliance (that is, to receive Federal program benefits, or Federal crop insurance, soil erosion must be controlled); we all know how quickly this requirement disappeared and it was almost never enforced anyway. The sticks and carrots approach just did not work. The IFCA tried, and its heart was in the right place, but the elephant called non-point pollution proved impossible to reverse.

There were other attempts over the years. A 1999-2000 report by the Iowa Nutrient Management Task Force (originally formed in 1991) and involving Agriculture, University, and Government Officials called for reviewing available information. They point out that many Iowa streams cannot meet proposed EPA standards and called for reasonable standards. The report spent considerable time questioning the science of hypoxia. It identified sixteen Best Management Practices (BMPs) that can be effective in nutrient reduction. They called for educational programs, demonstration projects and technical assistance to implement these BMPs. Voluntary cooperation was emphasized.

In 2001 the Iowa Watershed Task Force issued a similar report. However, it was more watersheds based, included flood control, and charted a 10-year (to 2010) plan including identifying five watershed model watersheds to concentrate efforts and demonstrate success.

## Iowa Nutrient Reduction Strategy

Online comment submissions

Page 2 of comment #836.

Timestamp 1/15/2013 3:59 PM

**Name** Dennis Keeney

**City** Ames

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The current Iowa Nutrient Reduction Strategy is another good effort to put a finger in the dike but in the end will not result in any progress, it is like a broken record of old, playing the same tune time and time again. True, it is more technology based than ever, but it shows no indication that the farmer, the landowner (often absentee) will be part of the solution. Iowa agriculture becomes a data stream, not responsive to real needs, differences in goals, and even land uses.

I am as frustrated as most when it comes to providing real solutions. It is hard when each area of the state will need different strategies, and each farm will be different. And what might work in an average year will fail when torrential rains come at the wrong time. Several, including Dr. Rick Cruse, Iowa State, have found that the change in rainfall pattern is one of the reasons for accelerated erosion in recent years.

As long as Iowa continues its current path, the proffered technical strategies are doomed to do nothing, they won't really fail, they just won't make much difference and the trend will continue.

It is how we use the land that counts. And we all know that the greatly increased demand for grains, causing increased prices, is driving Iowa further in the wrong direction when it comes to significantly controlling non point source pollution. To make a real change means getting out of the system that has gotten the state into in the first place. Instead of continuously calling for the same old BMPs lets put our collective heads together and look for new solutions. The proposal by the Iowa Environmental Council calling for implementation by farmers of basic stewardship plans on erosive land by farmers working with conservation planners, and to encourage farmers to participate with cities and industries in watershed-based planning should be considered.

It is time to propose bold new plans to take the initiative and reverse the decline in water quality and increased soil erosion in Iowa.

Conservation is getting nowhere because it is incompatible with our Abrahamic concept of land. We abuse land because we regard it as a commodity belonging to us. When we see land as a community to which we belong, we may begin to use it with love and respect.

Aldo Leopold



**Name** John Laflen**City****State****Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

Secretary of Agriculture Northey,

Disclaimer: I retired from the USDA-ARS to a farm in Northern Iowa. I performed research in Iowa and other states related to soil erosion and runoff water quality. Much of this work is cited in the nutrient reduction strategies. I was a coauthor of a report in earlier work related to the Hypoxia work.

I am strongly in favor of voluntary practices to accomplish the nutrient reduction strategies to reach Hypoxia goals. The key is that we must have practices that pay for themselves, that make economic sense to individual farmers if farmers are to adopt them and we are to meet hypoxia reduction goals.

And, whatever practices are adopted must maintain the highest productivity possible. We need this production to meet national and international needs for food, fiber and energy.

We have demonstrated that farmers will voluntarily adopt systems that reduce soil erosion. This was demonstrated by the rapid and voluntary acceptance of conservation tillage. But, this was because the conservation tillage systems were more profitable than the earlier conventional systems. It made economic sense for the farmer to adopt conservation tillage system-it increased his income and profits.

And, farmers will voluntarily adopt practices that reduce nutrient losses if they make economic sense to the individual farmer. If the practices required to meet hypoxia goals do not make economic sense, they won't be adopted voluntarily.

In my view, we should do two things to insure voluntary adoption of erosion and nutrient loss reduction practices:

- (1) Develop practices that reduce soil erosion and nutrient loss that will meet our goals for Hypoxia reduction and that make economic sense to farmers considering adopting them.
- (2) For those cases where we have not been successful in meeting our goals for Hypoxia reduction through the development of profitable conservation systems, reimburse farmers for their costs of adoption of these unprofitable practices to control hypoxia.

I would encourage Iowa lawmakers to support cost sharing of needed but unprofitable conservation practices in critical areas. I would also encourage them to fully fund critical research in developing new practices that will control soil erosion and nutrient losses. John Laflen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #838.

Timestamp 1/15/2013 4:45 PM

**Name** Laurie Christen

**City** Decorah

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Please do some research on what effect all the field tile is having on the flooding and pollution. I have seen fields that used to be a little soggy in the spring - I dont know if they would have exactly been called wetlands- that have been tilled... tilled again... and some on the third time being tilled now, in say the last 20 years. I cant help but think that it is too much. Is anyone keeping track of the miles of plastic laid?

I hate it that my sons would like to move out of Iowa because the fishing has gotten so bad around here because of pollution, cutting the trees over the creeks so now the streams rivers are warmer, and the silt. Sad.

Is there anything that common citizens can do, aside from not spraying lawns with bug spray and fertilizer, and wasteful watering? I personally would like to see a rule that you cant use fresh water to irrigate lawns. Either grey water or collected rain water.

Thank you for taking comments, tho I think it could have been better advertised. I would not have known about it except to a letter to the Editor about the extension date.

Thank you.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #839.

Timestamp 1/15/2013 5:00 PM

**Name** Lynn Stamp

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

This such an important issue. Please support a science based nutrient reduction strategy that supports the importance of voluntary conservation practices. Producers would embrace voluntary options for this. More regulations are not the answer.

If the state nutrient reduction strategy and other cost-share conservation programs are not adequately funded, then delays follow and producers cannot get projects finished when they need to be finished.

Our farm has participated in the CRP program, waterway programs, and headland programs to help control nutrient runoff. Without the help of funding, these projects would have been very expensive and may not have been implemented or finished. Lynn Stamp

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**840**.

**Timestamp** 1/15/2013 5:41 PM

**Name** David Bruning

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I urge you to make the adequate funding of the Iowa Nutrient Reduction Strategy a top priority.

We must have a science-based strategy that recognizes the importance of maintaining agricultural production while utilizing voluntary conservation practices as much as possible in a cost-effective manner. A blanket based approach will not work.

I realize some people do not trust voluntary approaches, but as a farmer I realize the importance of protecting our precious resources, as well as the extra costs that may be incurred by ignoring conservation practices. David Bruning

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #841.

Timestamp 1/15/2013 6:09 PM

Name Justin Wellik

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would like to expres my support for a science based state nutrient reduction strategy recognizing the importance of voluntary conservaton practices and the need to maintain agricultural production. I would like to urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs.

There are many variables that need to be considered in conservation programs. Geography, farming practices, weather, etc. As other parts of the country have proven, there is no one-size-fits-all initiative that will benefit agricultural production in Iowa. Personally, being mindful of tillage practices and manure application requirements are two things that we are very mindful of on our farm. We are evaluating our conservation practices on a yearly basis and VOLUNTARILY making adjustments where we see fit, even if they may effect production. It's evident as you drive around, that our neighbors are doing the same, it is our priority to be good stewards of the land. Justin Wellik

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #842.

Timestamp 1/15/2013 6:18 PM

Name Benjamin Johnson

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please support funding the Iowa Nutrient Reduction Strategy. I think it's great that we are trying to take a proactive approach to EPA's criticism of our water quality and runoff potential by using this science based strategy. Funding this strategy will keep Iowa's and the entire Mississippi River watershed cleaner.

This strategy is voluntary and it needs to stay that way. Forcing a one size fits all type of rule will not work, everyone's farming operations are too diverse. There is a long list of conservation practices I have voluntarily implemented to help reduce nutrient runoff. Contour farming, terraces, no-till and minimum till, filter strips, and waterways are some that have been used on my farm. A recent improvement I have made is a low disturbance liquid manure injector that I invested in. I hope to add other conservation practices in the future as well. These are all working for me, but other places it may not, just as there are other practices that may not work on my farm either.

There has been a back log of approved conservation improvements not being completed due to lack of funding. These are from farmers that wish to improve their practices, but cannot because they are not able to afford it on their own. Using a small portion of the \$800 million ending fund balance for conservation improvements and this strategy is an excellent one time use for some of these funds.

Please adequately fund the Iowa Nutrient Reduction Strategy and support improving Iowa's watersheds! Benjamin Johnson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #843.

Timestamp 1/15/2013 6:21 PM

Name Brian Peck

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

As farmers in rural Dickinson County we support for a science-based state nutrient reduction strategy. It needs to recognize the importance of voluntary conservation practices and it needs to maintain agricultural production. This is something that is very valuable in our county.

We need you as state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy. Along with the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed many needed conservation projects.

We continue to practice conservation tillage and manure filtration practices for our livestock facilities. We are look out for new and more enviromentally friendly practices. Brian Peck

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #844.

Timestamp 1/15/2013 6:23 PM

**Name** Thad Nearmyer

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing to show my support for a science based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agriculture production.

I am urging you to vote to fully fund the Iowa Nutrient Reduction Strategy including the state's other conservation cost share programs. Iowa's failure to fund these program's in the past has delayed needed conservation projects.

Iowa's farmers understand the importance of nutrient conservation and voluntary programs will allow farmers to suit the program to their farm's soil type, rather than a one size fits all program that may not work for everyone. Thad Nearmyer



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #845.

Timestamp 1/15/2013 7:11 PM

Name Jeffrey Koch

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would like to voice my support again for the state's nutrient reduction strategy. We all care about water quality, but there is no one solution that can solve every issue. That is why voluntary conservation practices are important to allow producers to use what works on their farm. Too many times we have seen regulatory action have unintended consequences.

On our farm we've installed terraces, ponds, silt dams and waterways. I also use no-till on 100% of our acres, use crop rotations and rotational grazing. I can tell you it pains us more than anyone after a large rain to see evidence of erosion on our farm and immediately look for ways to correct it. When producing a crop, there will always be a risk, but I feel great strides are being made.

That is why it is important to fund the Nutrient Reduction Strategy and also help reduce backlog of conservation projects already identified in the cost share programs. I believe this strategy is so much more desirable than the heavy hand of the EPA coming into Iowa and telling the state what to do. Jeffrey Koch

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #846.

Timestamp 1/15/2013 7:22 PM

**Name** Gregory Jochum

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am in support of the science-based state nutrient reduction strategy for the State of Iowa. Having these programs that are voluntary will allow us as farmers to implement them as we need to and which ones that pertain to each farmer.

The Iowa Nutrient Reduction Strategy needs to be funded to help protect our most precious assets--our soil and water. Each farmer has his own ways of farming and each ones fertilizer needs, tillage practices cannot be put into a one size fits all program.

On my farming operation I already do variable rate fertilizer, split applying nitrogen and prescription plant corn hybrids. Taking care of the land is my responsibility and if taken care of properly it will benefit my farming operation for many years to come.

Thank you for taking the time to read this letter and I encourage you to support and fund this strategy. Gregory Jochum

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #847.

Timestamp 1/15/2013 7:23 PM

**Name** Danny Furlin Jr

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Many farmers are very aware of the need to protect our land and water. This is very evident as you drive across rural Iowa. There have been many terraces, ponds built and waterways seeded in the last five years with many farmers spending there own money without funds from government.

In my own operation, I have cleaned out a old pond and seeded down hillsides to alfalfa. I do this because I want to protect my land and the water that comes off of it.

So please fund the Nutrient Reduction Strategy so we can take conservation to the next level. Danny Furlin Jr

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #848.

Timestamp 1/15/2013 7:23 PM

Name Leland Meitner

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I strongly urge your support of the Iowa Nutrient Reduction Strategy. What better plan is there than this developed by Iowa Department of Agriculture and Land Stewardship, Iowa Department of Natural Resources, and Iowa State University, using science and technology based approach. By using Iowa State University research we know what works and what doesn't. By funding this program and other voluntary conservation practices it should have a big impact on water quality in the state. I myself have put in grass waterways. The neighbor saw the benefits of having the waterway and put one in himself on his farm next door. Its important to protect these valuable resources for production agriculture. So please adequately fund this program and others to protect our resources. Leland Meitner

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #849.

Timestamp 1/15/2013 7:32 PM

**Name** Kirk Anderson

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Lets be proactive on this issue. We don't need someone in DC making our decisions for us. Kirk Anderson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #850.

Timestamp 1/15/2013 7:52 PM

**Name** Wayne Kramer

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would like to let you know that I support the science based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge you to fund the Iowa Nutrient Reduction Strategy along with the states other conservation cost-share programs. Iowa's failure to fund these programs in the past has delayed needed conservation projects.

Through the Hewitt Creek Water Shed Project, I take a nitrate test on our corn to see if we are over applying nitrogen. I also currently plant cover crops in the fall to prevent soil erosion. We also have a manure management plan in place. Wayne Kramer

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #851.

Timestamp 1/15/2013 7:56 PM

Name Tim Kaldenberg

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I recently listened to an Iowa Nutrient Strategy presentation given by Matt Helmers at an Iowa State Extension meeting. His presentation gave the detailed assessment of what it will take to reduce Nitrogen and Phosphorus going out of Iowa. It was very evident that a one size fits all plan will not work well in Iowa due to our different soils and land use. It was amazing how much work had but put into this assessment and the suggestions of what we could do in Iowa to reduce Nitrogen and Phosphorous levels leaving our state.

I serve on a committee with several farmers in the Chesapeake Bay watershed. I have heard there troubles of regulations being put in place by the EPA. Many of the regulations did not make sense for everybody in the watershed. I would much rather people in Iowa had a plan, rather than those in Washington DC.

I encourage your support to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. I know in our county the waiting list for cost share is several years. I have used cost share dollars to help with the construction cost of building terraces on my own farm and have greatly appreciated the help. Without the cost share program landowners will not build as many or any erosion reducing structures.

Thank you for your support of the Iowa Nutrient Reduction Strategy. Tim Kaldenberg

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #852.

Timestamp 1/15/2013 8:10 PM

Name Beth McGrath

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing to encourage you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa is being pro-active in their response to address the issue at hand. Iowa farmers ARE good stewards of their land and this program put together by Iowa institutes allows us to show the nation this very fact. We want to take care of our resources now and in the future.

We have been no-till farming for many years and many comment on the lack of run-off on our farms. We soil test so as to not over fertilize. In my opinion, the forcing of farming practices would only create problems. I think Iowa farmers care about their farm and the future of the land enough to inform themselves and implement the best plan for each area and farm.

The Nutrient Strategy system seems to be a very excellent plan allowing farmers to pride themselves into good conservation plans.

Thank you for taking my comments into consideration. Beth McGrath



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #853.

Timestamp 1/15/2013 8:28 PM

**Name** Dave Unsen

**City** Dubuque

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I feel it is extremely important to protect our natural resources in order to promote quality of life standards. We need to preserve what clean waterways we have now and continue to restore waterways that have been damaged in the past through careless land use practices. There needs to be more educational programs to promote better conservation efforts, and assistance made available to parties interested in making changes to reverse poor conservation practices. Along with training and assistance there should be consequences for those who are reckless and irresponsible for their actions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #854.

Timestamp 1/15/2013 8:38 PM

**Name** Norlin Mommsen

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I urge you to adequately fund the Iowa Nutrient Strategy. Using science and not emotion is the only sound approach that should be used to address the nutrient issues that face Iowa agriculture today. This approach will assure us that the desired reductions can be achieved. The funding is the key to making this strategy work.

In agriculture we have a long history of using voluntary programs to protect the environment while maintaining productivity. This strategy needs to be continued. Norlin Mommsen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #855.

Timestamp 1/15/2013 8:43 PM

**Name** Chad Adams

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I strongly urge funding of conservation practices to keep farmers doing the right conservation practices on their farms. On our farm we buffer strips along our creek as do our neighbors for almost 1.75 miles. We have grass waterways where needed and headlands on our hilly ground for end rows to control erosion. We use minimum till for our corn and no-till our soybeans to conserve soil. Many farmers our using many voluntary practices on thier farms currently and will continue them in the future. Please help fund the Nutrient Reduction Strategy to help farmers maintain agricultural production in a cost effective way. Chad Adams

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**856**.

**Timestamp** 1/15/2013 9:08 PM

**Name** Kenneth Gard

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I urge you to support a science based state nutrient reduction strategy, that is properly funded. This would help farmers to voluntarily implement the conservation practices that are needed to help maintain the agricultural production that the World's population needs. I and my family own over 1000 acres that are properly terraced. We also have '638's where needed, if the neighbors agreed to them. These practices help to conserve water and nutrients. We also farm using no-till practices. In closing, I again urge you to support this program and the funding necessary to install the conservation practices needed to make the program work. Kenneth Gard

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #857.

Timestamp 1/15/2013 9:20 PM

**Name** Chad Means

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I want to know I and others support voluntary nutrient reduction, conservation practices to keep us safe. This will not overwhelm the family farm. Chad Means

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #858.

Timestamp 1/15/2013 9:34 PM

**Name** John Finneseth

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I am in support of having water control measures in place however they need to be done without infringing on the rights of farmers. We cannot blame all the problems on one set of people. As a farmer we have set of many conservation practices with buffer strips, management of chemicals, and good practices of where we put tile. I hope you will recognize that most farmers are good land stewards and they care about the environment. I also hope you recognize that if given to much power the government will start stepping on the rights of the farmer to make there own decisions about there land. John Finneseth

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #859.

Timestamp 1/15/2013 9:40 PM

**Name** robert shatek

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

have filter stripes and headlands in place on my own. would like to do more but need assistance with cost of land so high. more farmers would do the same. robert shatek

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #860.

Timestamp 1/15/2013 9:56 PM

**Name** Kevin Maloney

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am a farmer in Delaware county Iowa.I fully support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge state lawmakers to fully fund the Iowa Nutrient Reduction Strategy as well as the state's other conservation cost-share programs .Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

I have been envolved in wetland reserve programs in the past and look forward to participating in other conservation programs in the future.  
Kevin Maloney



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #861.

Timestamp 1/15/2013 10:04

**Name** Ryan Burns

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**  **Nonpoint Source**  
 **Policy**  **Point Source**

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Secretary of Agriculture Northey,

As an 4th generation Iowa farmer I believe it is very important to support science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

It is vital to adequately fund the Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these program in the past has delayed needed conservation projects.

I have implemented farming conservation practices on my own to insure I am a good steward of the land. Things like reducing tillage, adding and repairing waterways, and variable rate fertilizer application just to name a few. In the future I hope to reduce fertilizer to only what my crop needs and moving to an even less tillage to reduce erosion. Sustaining my way of life is important to me and my family. I hope to pass on the family farm ground to the next generation in the same or better condition. Ryan Burns

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #862.

Timestamp 1/15/2013 11:04

**Name** Jim Murdock

**City** Ames

**State** Iowa

**Providing comment on the following sections:**

Executive Summary       Nonpoint Source  
 Policy                               Point Source

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Reduction of nitrogen and phosphorus runoff is extremely important and urgent. Since the vast majority of the nitrogen and phosphorus that goes from Iowa through the Mississippi river to the dead zone comes from agricultural non-point sources, it is clearly inadequate to have a strictly voluntary policy for this source of nutrient pollution. As Also Leopold pointed out in The Sand County Almanac, under a volunteer system the majority of farmers will always take those actions that provide a financial benefit for themselves and avoid those that come with a cost. It has been objected that having requirements is not workable because the appropriate actions differ according to the type of soil and land formations present on each individual farm. But this only means that the requirements should not be so specific that a farmer is forced to do things that are not right for his or her land. Each farmer should be expected to have a plan to reduce nutrient runoff and to be able to show that the actions in the plan have been and are being carried out. The plan could be selected from a list of model plans for different circumstances, or the farmer could blend the model plans in special cases. As the EPA has said, numerical goals should be included. Experts have said that it is possible to devise regulations that are workable, and this is too important to leave to chance.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #863.

Timestamp 1/16/2013 4:30 AM

Name Mark Riesselman

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

Secretary of Agriculture Northey,

I am writing today in support of the IDALS and DNR conservation plan for the Iowa Nutrient Reduction Strategy. As you know this plan is designed to reduce waste nutrients in surface water from both point and nonpoint sources. This proposed plan or strategy uses scientific, reasonable and cost effective measures.

In my farming operation, we have already utilized policies that reduce waste runoff. We do not apply fertilizer in the fall and we only apply it if the field needs it. When we do apply fertilizer we only apply at the rate of what is called crop removal. Crop removal is the level of fertilizer that crop would use for a normal year. Crop removal takes into account the level that is already in the soil. We already utilize GPS to guide where it is applied. In the future, our farming operation will use GPS not only to guide application but vary the rate or amount applied. This will serve two purposes of keeping rates and cost down and reducing waste or runoff.

We have planted grass waterways in our fields and grass buffers along streams. This reduces the amount of waste that can get into the water source. Also, in areas that can be hayed has added income to us and benefitted the livestock producers in the area.

We need to evolve a plan that works for everyone; farmer, urbanite, and city. No one person or group is responsible for the problem in the gulf. Together we can reduce the nutrient load that is discharged into Iowa's rivers and ends up in the gulf. Many people are pointing their fingers at the farmer because he is an easy target. Cities contribute to the problem by their waste water plants. Individual city people contribute to the problem by the idea that fertilizing their lawn if little is all you need, use more is better, I can afford it.

The IDALS and DNR plan is the best plan so far so let's keep with it. Mark Riesselman

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #864.

Timestamp 1/16/2013 4:30 AM

Name Scott Osborn

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

I am asking for your support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I also hope that you will work to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

I have had the opportunity to work with farmers - that have made sincere efforts to conserve our soil and protect our water, and hope that you can provide the support to make this strategy work.

The future of water quality protection in Iowa is in your hands! Thank you for taking action!

Sincerely, Scott Osborn

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #865.

Timestamp 1/16/2013 7:15 AM

Name Jamie Waddingham

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support the need for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. The state needs to have a trial period with voluntary conservation implementation. If this does not work, mandated conservation practices should be implemented.

I urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. Again, funding is the key issue that does not get the support by lawmakers.

I know individuals that have implemented voluntary conservation practices. They are anticipating to implement more practices in the future to benefit their farm and the surrounding environment. Jamie Waddingham

**Name** Nolan Ford**City****State****Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

Secretary of Agriculture Northey,

I am a 3rd generation grain and livestock farmer in Cedar County, Iowa. Doing our part to maintain good water quality for our community has always been a priority of our farm.

I strongly feel that maintaining good water quality starts with employing farming practices which reduce water runoff and erosion of our precious top soil. I have basically been involved with tilling and planting row crops for 30 years. Our farming practices have changed markedly during that stretch of time. Today, we are basically 70 percent no-till and 30 percent conservation till.

We have installed 3 different terracing projects, 2 miles of filter strips along streams, and have reconstructed numerous waterways all in an effort to reduce and or filter any potential nutrient run-off. For at least one half of the past 20 years our operation has been involved in an EQUIP or state funded cost share project.

During that same span of time our crop residue and soil organic matter have steadily increased. This slows water runoff from our farms and increases nutrient tie up. Through the use of GPS soil testing, fertilizer application rates have been adjusted to insure that we are applying only what we need. Atrazine and other chemical application rates have been refined to reduce potential carry overs in the soil.

Here is the bottom line. When we take care of our top soil, we ensure a sustainable production system for years to come. When we apply nutrients and chemicals on a prescription basis, we use less and have more profit in the end. My goal is to have a 4th generation farming operation for my family down the road. Voluntary nutrient conservation practices will help to assure that this goal is met.

Getting in front of this issue on a voluntary basis only makes good sense. We may need a little help from our county NRCS offices. The good news is that that component of the infrastructure is already in place.

Sincerely,

Nolan Ford Nolan Ford

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #867.

Timestamp 1/16/2013 7:49 AM

**Name** Bonnie Vos

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

Please fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. Bonnie Vos

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #868.

Timestamp 1/16/2013 7:59 AM

**Name** Roy Koeppe

**City** Rolfe

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Water pollution already is rampant here in Iowa. This is far too permanent a situation to be essentially ignored.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #869.

Timestamp 1/16/2013 8:11 AM

**Name** David Larson

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am in favor of voluntary nutrient reduction in Iowa. If this is ever becomes mandatory then I hope the cost of compliance is shared by the State and EPA. Everyone wants clean water, farmers will do what we can if there is a problem. David Larson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #870.

Timestamp 1/16/2013 8:14 AM

Name Neil Johnson

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

This is a great chance to have a law here in Iowa that, to my understanding, is like no other state nutrient law. Iowa's law makes sense!! Using science makes sense.

On my own farm, I have gone through great lengths to keep my dirt, and my fertilizer on my farm. I have installed many terraces with drop inlets, one of which is nearly 1/2 mile long. I have installed 3 new drop inlets in the last year. On the 80 that my home is on, not one drop of rainfall does not go through a drop inlet or one of my three ponds. I use conservation tillage to keep from losing soil and nutrients.

What we farmers need is for the government to help fund our conservation practices and this new nutrient law. Once again, thank you for coming up with a GOOD new law that actually makes sense!! Neil Johnson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #871.

Timestamp 1/16/2013 8:15 AM

**Name** Leo Kluesner

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support the science-based state reduction strategy for the future of our state. Funding for the program not only needs to be supported by the state and also by the farmers working the land. Land owners need to take responsibility for their farms conservation practices. In the past, the government had a conservation program on tillage, crop rotation, buffer strips, and boarders. Where did that program go; down the river like the soil! Farmers not implementing conservation on their land need to be fined; not given a government check. In the past, I have seeded water-ways where need to be and rotated with hay and corn. In the fall we seed winter wheat on bare soil. Leo Kluesner

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #872.

Timestamp 1/16/2013 8:17 AM

**Name** Dr. Clark Porter

**City** Waterloo

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The scientific foundation of the nonpoint source nutrient reduction strategy, along with the preliminary economic analysis, is impressive. I manage my family's farm and I am aware of the general opinions among farmers and organizations like the Farm Bureau. They want the strategy to be voluntary. While I sympathize with them, a close reading will reveal that most of the strategies that are both effective and reliable involve the use of strategies that take land out of production or call for measures that reduce N runoff but do not return N to the field. I do not believe a purely voluntary system, one without penalties or incentives, will be effective. It would, in effect, penalize those who are most conscientious.

Penalties should be a last resort. I would urge the state to invest in potential incentive-based programs for N and P reduction. Some of the ideas you could pursue would be tax reductions for growers who implement strategies that have upfront costs or take land out of production, crop subsidies for those with low Nitrate runoff, inheritance tax relief for farmers who preserve the land for the future, and "Nitrogen Co-ops" that market cover crop seeds and provide services aimed at reduced N ("rescue nitrogen method").

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #873.

Timestamp 1/16/2013 8:40 AM

**Name** Kathryn Henderson

**City** Logan

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water. History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem

Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #874.

Timestamp 1/16/2013 8:47 AM

**Name** Chris D. Gilstrap

**City** Coralville

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I agree with the technology-based approach in the IDNR nutrient reduction strategy as a reasonable and cost-effective plan for point source stake holders.

The initial base limits of 10 mg/L of nitrogen and 1 mg/l of phosphorus should be cost-effectively achieved by most current treatment technology by most facilities.

I especially agree with how compliance will be determined. Monthly limits are necessary as a measurement tool for treatment performance. I support the IDNR approach of establishing compliance on an annual average rather than by monthly limits.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #875.

Timestamp 1/16/2013 9:22 AM

**Name** Adam White

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please continue to support agriculture in the great state of Iowa by supporting a science based state nutrient reduction strategy and voluntary conservation practices.

We need to fund the Nutrient Reduction strategy as well as all other conservation cost share programs, so we don't have any delays in needed conservation projects like we have seen in the past. Adam White

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #876.

Timestamp 1/16/2013 9:44 AM

**Name** Luke Cline

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

Adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Our failure as a state to adequately fund these programs in the past has delayed needed conservation projects. Luke Cline"



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #877.

Timestamp 1/16/2013 10:20

**Name** David Griesse

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

We would ask that you would support science-based nutrient reduction. Farmers need to have these programs funded so we can show the research that they work. Voluntary conservation practices that farmers are using help to reduce run off of nutrient. The support is necessary so a one size fits all doesn't come in to play. Thanks David Griesse

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #878.

Timestamp 1/16/2013 10:41

**Name** Sherman Needham

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I believe that Iowa has a good record of farmers putting conservation practices in-place on a voluntary bases.

With a renewed push this year for additional efforts to implement conservation practices and structures I would urge that we adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs.

I have implemented no till planting and the use of winter cover crops to reduce soil and nutrient loss. There is more that I would like to do as well. Sherman Needham

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #879.

Timestamp 1/16/2013 10:55

**Name** Dennis Kruger

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please support science based State nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agriculture production. Dennis Kruger

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #880.

Timestamp 1/16/2013 11:02

Name Blake Anderson

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

Land in Iowa is very valuable today. We need to protect the land through using voluntary conservation practices. These practices need to be supplemented through cost-share programs. The cost-share assists landowners to complete needed practices and accomplish more of such needed practices.

If Iowa fails to adequately fund cost share and other nutrient reduction programs, Iowa as a whole will hurt due to delaying needed conservation projects as well as washing high quality soils away.

On my family farm, my father and grandfather have implemented many voluntary conservation practices of grade stabilization structures and terraces. I hope to implement such projects in the future. Being a good steward of the land, I will go forth with planned conservation practices, but state cost-share will assist me in accomplishing more.

Please adequately fund the Iowa Nutrient Reduction Strategy and other conservation cost-share programs. Blake Anderson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #881.

Timestamp 1/16/2013 11:04

**Name** Kate Timmerman

**City** Cedar Rapids

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Many ag producers fail to apply their nutrients based on a nutrient management system. With actual current soil tests, real yield goals, and an educated and judicious application rate I think a great reduction in non-point sources of nutrients could be achieved. Because there are voluntary programs to assist ag producers with getting and using a nutrient management system, and have been for a while now, I suggest that the Nutrient Reduction Strategy seriously consider requiring a nutrient management system, based on scientific data, from every farmer who applies nutrients to their farm in Iowa. The voluntary system has been an option that many have chosen NOT to do, and it is not working.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #882.

Timestamp 1/16/2013 11:27

Name Ryan Woebbeking

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

We need a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

We need to adequately fund the Iowa Nutrient Reduction Strategy, without funding and research there is no guarantees that limiting nutrients or practices will even have an impact.

If there is any question to look into it would be... Does Field Tile reduce nutrient run-off" With proper funding and research these questions can be answered.

We as farmers aren't dumping or overloading our farms with fertilizer. Most farmers only put on what they have too, to raise a "good" crop. In fact many farmers such as myself use variable rate applications based on our soil sample results. Limiting nutrients will greatly effect the bottom line of Iowa's farmers. Ryan Woebbeking

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #883.

Timestamp 1/16/2013 11:37

**Name** Darwyn Bettin

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

In my area a voluntary solution to nutrient reduction is the favored system. No two farms, or hill sides, or waterways are the same. Therefore no one solution will be a good fit for all locations. A reduction plan that is based on science and has producer support will have a better long term chance of success.

Equally important is the funding for all of the state's conservation practices. In many areas there would be miles more terraces if the funding was there to meet the desire to build. The same holds true for other practices. Please fully fund the cost share programs in place.

I have built water ways and would build more, but I am on a waiting list for funds. I am exploring more no till practices on my farm now and hope to do more in the future. Darwyn Bettin

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #884.

Timestamp 1/16/2013 11:46

Name Mike VerSteeg

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I would ask your support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

Please adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

A voluntary program is much more preferred than more costly regulation. The voluntary practices I have implemented on my farm include no-till, strip-till, terraces, grass waterways, grid soil sampling and GPS fertilizer application, manure sampling. All these practices not only make sense for nutrient reduction, but also benefits my bottom line. Please act on voluntary measures to eliminate the threat of more regulations.

Please contact me if you would like to learn more about the practices I have implemented on my farm. Mike VerSteeg



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #885.

Timestamp 1/16/2013 12:30

**Name** ron Kilburg

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**  **Nonpoint Source**  
 **Policy**  **Point Source**

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Secretary of Agriculture Northey,

I urge our legislators not to impossible new regulations to improve our water quality. I believe water quality can be improved voluntary by using Iowa's science based, nutrient reduction strategy. The programs should be funded by current state and federal agencies that are in the strategies. Farmers continue to improve their management practices which improve water quality. ron Kilburg

**Name** Drake Larsen**City** Ames**State** Iowa**Providing comment on the following sections:****Executive Summary****Nonpoint Source****Policy****Point Source**

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I am writing in comment to the Iowa Nutrient Reduction Strategy draft, released November 2012. A state level strategy focused on Iowa's water quality is greatly needed. The partnership forged between IDALS, IDNR and ISU-CALS is to be commended for taking the first step. I am confident that this partnership provides the critical institutional support required to assemble the diversity of stakeholders that needs to be at the table for the task of improving water quality in Iowa.

The draft document provides a thorough overview of the current science regarding water quality management practices. However, with respect to non-point source nutrients—namely those of agricultural origin—an actionable strategy is profoundly lacking. Understanding that structured decision making is an iterative process, the strategy draft can serve as a tool kit moving forward. Now we need a step-wise plan for getting these and other changes implemented. We need leadership for getting boots on the ground.

The draft is described as being a science and technology based approach, and indeed it is. Regrettably land management is inherently more than that. The authors from ISU-CALS overlooked multiple disciplines at their disposal that could have provided invaluable insight into the creation of a tangible nutrient reduction strategy. For example, within CALS there are professors of rural sociology that have published on the adoption of agricultural practices, on the diffusion of innovations, and even on watershed work in Iowa; their work is not cited, nor is there a plan for facilitating the widespread adoption of the practices discussed. Likewise, there are professors of ecosystem management; their work is not cited, nor are the tenets they teach considered. Overall, the science regarding farmers and citizens was not included and these people are similarly ignored in the plan of action.

The draft calls for a voluntary approach for ameliorating corn and bean agriculture's negative impact on water quality. The draft does not explain how this is different than what has been done in the past; an approach that has created the problems we currently face. I recently asked an Iowa farmer his thoughts on a voluntary approach, his response, "You do what you've done, you get what you've gotten." More plainly, a long-time Iowa Soil and Water Conservation District commissioner told me, "Voluntary doesn't work."

In discussion surrounding this draft document "voluntary" is often cast as an alternative to "regulation". This is a black-and-white fallacy that seems to have infected the NRS document as well. Between these two philosophies there is a lot of room for the state of Iowa to play a larger role in provisioning clean water for its citizens. Passively relying on voluntary action is no plan at all. The prioritization of watersheds and watershed resources coordination, outlined in the draft, is all for naught if the science of targeting is not followed through to the field level.

No individual's comments will contain the perfect formula for solving our water quality issues, which is why moving forward this process needs to be open to a diverse array of ideas from the whole spectrum of stakeholders, Iowans. I suggest the next draft include bigger, state-scale ideas along the lines of:

- state support for marketing the products of extended crop rotations and alternative agricultures
- property tax incentives for stewards of water quality
- state-of-the-art remote sensing for the targeting of high pollution source areas
- mandatory minimum width riparian buffers along all waterways
- an anhydrous ammonia tariff to fund wetland restoration and construction
- full funding of all existing water quality programs such as REAP and the Iowa Water and Legacy Fund

Sincerely,  
Drake Larsen — Ames, Iowa

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #887.

Timestamp 1/16/2013 12:54

**Name** Diane Rosenberg

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I am greatly disturbed by the proposed Iowa Nutrient Reduction Strategy. It is deeply flawed and beholden to industrial agriculture special interests. Our environment and all the people who live in Iowa need you to do much, much better than this. Our waterways are some of the very worst in the nation. This strategy will do nothing to improve them or reverse the dead zone in the Gulf.

Specifically, here are all the reasons I am opposed to this version of the Nutrient Reduction Strategy. These exact words come from an email I recently received, but I agree with ALL of them:

- While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.
- History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.
- The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.
- Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.
- The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.
- The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

Please, go back to the drawing board and come up with a strategy that protects Iowa's water, not protects special industrial agricultural interests that this strategy clearly benefits. This is pathetic.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #888.

Timestamp 1/16/2013 1:02 PM

**Name** Mark Buskohl

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

Farmers want to do the right thing for water quality and have been doing it through conservation practices and soil saving strategies such as buffer strips, terraces, grass waterways, no-till and conservation tillage. As a livestock farmer I am

careful to use the manure that my livestock produce to fertilize my crops in a very sustainable way. Farmers will voluntarily to the practices for water quality because of science based facts, good economic sense(not using any more nutrients then the crop needs) and because we are stewards of our farms. Because we live on the land we know what will work and get results rather then someone from Washington D.C. Not every practice will solve every problem on every farm. Farmers need flexibility and yes some funding to cost- share some of the practices but we have made tremendous strides in the last years and will continue to do so. Iowa Nutrient Reduction Strategy is a sound plan. Please support it. Thank-you. Mark Buskohl

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #889.

Timestamp 1/16/2013 1:07 PM

**Name** Daniel Carter

**City** Ames

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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It is clear that this plan was designed to fail to address the problem. Polluters cannot be expected to voluntarily take actions to mitigate pollution when the alternative to continue the status quo. Perhaps a better "voluntary" option would be to tax farmers much more heavily, if they don't demonstrate actions and use that tax money to deal with the mess, or at least compensate those whose livelihoods and recreational opportunities are spoiled by nutrient pollution.

I am ashamed that this is the best approach that my state can put together.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #890.

Timestamp 1/16/2013 1:09 PM

Name Alyce Nieland

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

I am writing to you in regards to the Nutrient Reduction Strategy. I wanted to express my support of the current outlook on this topic, one of science-based and voluntary practices. Iowa State University has done numerous research and has the knowledge to recommend the best ways to reduce nutrient run-off. In today's society, we let emotions get in the way of what is truly best for ourselves and the environment. By sticking with science-based ideas and a voluntary program to implement them, I think we can solve problems associated with nutrient runoff.

I bring up voluntary practices because we do not need any more regulations telling farmers and other environmental enthusiasts how to do their jobs or what they should do. Putting more regulations into play will not help the issue but only make people more frustrated. We are farmers of the land for a reason. We love the land. If we don't take care of it, we will not be around down the road. We depend on the land like the land depends on us to take care of it.

I hope that you and your fellow lawmakers support funding of this Nutrient Reduction Strategy, along with other cost-share conservation programs that will help get better conservation practices in use. Alyce Nieland

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #891.

Timestamp 1/16/2013 1:15 PM

**Name** Robert Nath

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I very much support the practice of allowing conservation practices protecting our precious water to be regulated by farmers. Afterall, farmers are true stewards of the land!

We voluntarily use wise conservation practices already and do not want further regulations by some group or department that has no idea of the strong tradition and prout heritage of farming.

We support a water plan that lets us, farmers, be part of the solution. Robert Nath

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #892.

Timestamp 1/16/2013 1:31 PM

**Name** Harley Hassebroek

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

As farmers, we are good stewards of the land. It is our practice to do what is best for the land, animals and ourselves and we recognize the importance of conservation practices. But this should not be mandated by some authoritative group with no logic or common sense to modern farming techniques.

These programs need to be funded and supported with farmer input. Harley Hassebroek



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #893.

Timestamp 1/16/2013 1:38 PM

**Name** MaryLea Holcomb

**City** Adel

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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If voluntary compliance would work it should have been working already; all farmers have been able in the past to comply voluntarily with no impediments.

Since municipal treatment plants will be required to comply, then farmers should also be required to comply.

If farmers comply, THEN they could be eligible for subsidies such as crop insurance.

Thank you for considering my ideas to make our state a place where I can take my grandchildren into our rivers (as we once did with our children).

Sincerely, MaryLea Holcomb

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #894.

Timestamp 1/16/2013 1:38 PM

**Name** Sara Anderson

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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- The state's proposed strategy falls short in many ways:
- It relies entirely on the same voluntary approaches for agriculture that have failed to clean up Iowa's water.
- It puts the bulk of the financial burden on taxpayers, even though profitable farm businesses are responsible for the bulk of the problem.
- It fails to set any common sense standards to restrict a handful of the most polluting farming practices.
- The strategy outlines no timelines, interim goals or means of measuring annual progress toward reducing agricultural pollution.
- It includes no explanation of how the plans will be implemented, how problems will be prioritized or who will make these decisions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #895.

Timestamp 1/16/2013 1:42 PM

**Name** Stefan Gailans

**City** Ames

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I am very much concerned with the lack of input from social scientists in this strategy. As an agronomist, I find the science assessment for nonpoint source reduction of pollutants to be very thorough and a fine compendium of the vast knowledge and data that addresses water quality issues in agricultural production. However, how these many and diverse strategies are to be implemented in the varying Iowa landscape (varying in topography as well as world views and socioeconomic status) is not apparent in this strategy. This is the very reason I am dismayed at the lack of social science (much of which has been conducted at ISU) that is included in this strategy. The strategy is leaning on "voluntary actions" of landowners and farmers but does not address the likelihood of landowners and farmers to adopt any number of the different methods for improving water quality. While the voluntary action of landowners and farmers is essential to improving water quality, this strategy document does not address how more landowners and farmers can/will be recruited to also adopt any number of voluntary actions. It seems the Iowa Farm Bureau (long a proponent of voluntary action and opponent of any governmental regulation) has had an undue amount of influence on this strategy. Government regulation or incentivizing of conservation methods does not and should not be an "all or nothing" act. Realizing that conservation methods aimed at improving water quality differ across the farming system of Iowa is essential. Once this is realized, regulation and/or incentivizing of conservation methods appropriate for the situation and tailored to specific farming operations could certainly be successful.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #896.

Timestamp 1/16/2013 1:51 PM

**Name** Mark Meirick

**City** Protivin

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I believe in the voluntary strategy for developing plans for nutrient reduction. Overall I think that producers are doing well with current practices and will continue so in the future. With new guidelines and incentives, I believe we can reach reasonable goals for reducing nutrients into the environment.

Sincerely,

Mark Meirick

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #897.

Timestamp 1/16/2013 1:58 PM

Name Eric Nelson

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

As a long term no-till farmer, I realize better than most the difference that can be made voluntarily in controlling erosion. As an industry, we need to maintain our ability to be productive, without the intrusion of heavy handed government mandates that aren't science-based. Leaving field borders intact and no-tilling ground that isn't highly erodible (but in sensitive areas) can make a significant difference in keeping waters clean. I'm doing these things and have been for twenty years.

Conservation cost share programs are important here in Iowa and have also been effective in helping terrace and waterway sensitive areas. These programs need to be properly funded.

In conclusion, it is my belief that proper funding of existing programs and the implementation of the voluntary practices proposed will meet the nutrient reduction strategy goals. Eric Nelson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #898.

Timestamp 1/16/2013 1:59 PM

**Name** Jerrie J Noyes

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #899.

Timestamp 1/16/2013 2:00 PM

**Name** Frances Burmeister

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Although the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water. History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels. Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy. The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #900.

Timestamp 1/16/2013 2:01 PM

**Name** Gary Wacknov

**City** fairfield

**State** iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #901.

Timestamp 1/16/2013 2:08 PM

**Name** Pam Emmer

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

- 
- While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.  
Please take further action so Iowans can have safe drinking water

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #902.

Timestamp 1/16/2013 2:13 PM

**Name** Jeffrey Hedquist

**City** Libertyville

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The Iowa Nutrient Reduction Strategy is extremely disappointing. It does not set adequate standards for reduction of agriculture's contributions to the excessive nutrients in our water.

It asks for voluntary approaches for agriculture that have failed over 40 years (since only 30 percent of Iowa farmers participate in voluntary programs) to clean up Iowa's water.

It puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels. Hey, I'm a farmer, and I know this isn't fair.

The most polluting farming practices won't have any standards for restriction.

It sets no timelines, interim goals or means of measuring annual progress toward reducing agricultural pollution.

There are no details on how the plans will be implemented, how problems will be prioritized or who will make these decisions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #903.

Timestamp 1/16/2013 2:20 PM

**Name** Janis Holloway

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I urge you to support and fund the Iowa Nutrient Reduction Strategy and other conservation cost-share programs. Farmers do conservation practices to preserve the land and protect the water and will continue to do so but more regulations is not the answer. Thank You Janis Holloway

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #904.

Timestamp 1/16/2013 2:26 PM

Name MaryAnn Donlon

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

We have a long history of deep care for the land. The Iowa Nutrient Reduction Strategy continues those traditions and makes Iowa a leader in finding solutions to nutrient loading to the waters of our state and improving water quality. We in the farming community recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. We participate in the cost-share conservation programs, we have 10 year along our creeks, tree programs, waterways in our fields, manage our crop spraying, put on the amount of fertilizer needed, just to name a few. We have much more to do on our farms and with the addition of more land without adequate funding from these programs we will not be able to do these projects. I urge you to fund the Iowa Nutrient Reduction Strategy and Iowa's other conservation cost share programs. MaryAnn Donlon

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #905.

Timestamp 1/16/2013 2:30 PM

**Name** Thomas Eischen

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

i support the nutrient reduction strategy

I hope you can also support it Thomas Eischen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #906.

Timestamp 1/16/2013 2:31 PM

**Name** Jodi Frederick

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Our family would really like show our support for a science-based state nutrient reduction strategy that will recognize the importance of voluntary conservation practices and the need to maintain agricultural production. We encourage all state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy as well as the conservation cost share programs. The failure to fund these adequately in the past has delayed needed conservation projects. Our family farm uses conservation practices on our farm and we will continue to. Jodi Frederick

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #907.

Timestamp 1/16/2013 2:34 PM

**Name** Bill Blackmore

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

- History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.
- The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.
- Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.
- The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.
- The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #908.

Timestamp 1/16/2013 3:00 PM

Name Frank Mertz

City Webster

State Iowa

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

January 11, 2013

Mr. Chuck Gipp

Director Iowa Department of Natural Resources

Wallace State Office Building

502 East 9th Street

Des Moines, Iowa 50319

Mr. Bill Northey

Secretary Iowa Department of Agriculture and

Land Stewardship Wallace State Office Building

502 East 9th Street

Des Moines, Iowa 50319

RE: Iowa Nutrient Reduction Strategy □ Ducks Unlimited Comments

Dear Mr. Gipp and Mr. Northey:

Thank you for the opportunity to comment on Iowa Nutrient Reduction Strategy □ A science and technology-based framework to assess and reduce nutrients to Iowa waters and the Gulf of Mexico. Ducks Unlimited is a non-profit wetland conservation organization dedicated to conserving, restoring, and managing wetlands and associated habitats for North America's waterfowl, which also benefits other wildlife and people. Iowa DU has approximately 20,000 members located throughout the state who care deeply about the quality of water, conservation of our resources, and our quality of life. Since 1985, DU has invested more than \$17 million and conserved approximately 63,000 acres in Iowa.

DU appreciates the strategic, science and technology-based approach in the development of the Nutrient Reduction Strategy (NRS). Regarding the NRS, we recognize that there are many unknowns and data gaps that remain with this critical issue. We recommend that as the NRS moves forward, science and technology continue to play a key role in the development, expansion and implementation of each of the eight actions. We also encourage more specifics to be included in the action items as the NRS is refined. DU has also limited its comments to agricultural landscapes where we do most of our work, rather than focus on point sources.

We heartily endorse the use of protected, restored and enhanced wetlands as a key Best Management Practice (BMP)/tool for reducing nutrients and sediments. We also encourage the use of wetlands to slow stream/river flows to reduce in-stream erosion. However, we encourage a strong stance to protect all existing wetlands and guard against the destruction of wetlands or other negative impact to wetlands within the NRS. We support the use of mitigated wetlands as a nutrient reduction tool, but only after the application of □ avoid, minimize and mitigate sequencing, and only within the context of existing federal and state wetland and water laws. Existing wetlands should not be drained and/or impacted to be mitigated elsewhere as part of the NRS.

One excellent source of supplemental information on the positive impacts and contributions of wetlands and other BMPs is the Broughton Creek study, which examines the negative impacts caused by wetland drainage to the watershed and adjacent water bodies. The study provides recommendations on how wetlands can provide tangible and measurable improvements in reducing nutrient and sediment loadings.

For more information, see: YANG, W., X.WANG, S. GABOR, L. BOYCHUK, P. BADIOU. 2008. Water quantity and quality benefits from wetland conservation and restoration in Broughton's Creek Watershed. Research report submitted to Ducks Unlimited Canada. <http://www.ducks.ca/our-science/our-research/broughtons-creek/>



**Name** Frank Mertz**City** Webster**State** Iowa**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

In relation to Actions 1 & 2, we support the prioritization of watersheds, as well as the determination of watershed goals. We encourage public participation in both of these action items, as well as a robust process to ensure all stakeholders have input and understand how priorities and goals were developed. It will be critical that science-based accountability and verification be in place to accurately measure progress.

We also stress the importance of setting realistic/achievable goals with phased timelines to ensure meeting explicit numerical objectives and reporting meaningful progress. This will be essential to secure overall plan success.

For Action 4, DU supports voluntary programs to implement conservation programs and BMPs. However, without a high degree of implementation, we are concerned that lack of progress on reducing nutrients and sediments will increase the likelihood of regulatory measures. Therefore we recommend that this action expand strategies and actions to secure a high degree of landowner engagement and implementation, in addition to science-based verification systems.

For Action 6, we stress the importance of developing a science-based, peer reviewed accountability and verification system that accurately and critically evaluates both point and non-point based sources. Much more detail needs to be supplied, including appropriate benchmarks, criteria, measures, etc.

For Action 7, we applaud the NRS adaptive management approach as well as plans for an open and transparent reporting process. We would encourage the WRCC to secure public input in regards to the NRS evaluation and whether it should be reviewed and updated.

We also encourage the development of a public communication/outreach strategy to garner public support for the NRS. This will be critical to ensure long-term funding and resources.

In regards to funding the NRS, we suggest a much more detailed and exact plan/budget to ensure successful delivery and implementation of conservation practices and BMPs. Currently we do not have a five -year Farm Bill authorization and in all likelihoods the new Farm Bill will have reduced funding levels for conservation. Although state budgets are better now than in past years, that may change within the life span of the NRS. We encourage expansion of current state funding programs, including but not limited to REAP, Lake Restoration funding, Watershed Protection Fund, Farm Bill programs, etc. However we also recommend the NRS leaders, partners and stakeholders consider a funding mechanism for Iowa's Water and Land Legacy so that permanent long term funding can be secured for land and water conservation in the state.

In our 75 year history, Ducks Unlimited has learned that implementing landscape solutions is what yields success for any plan or strategy. Iowa can develop the best priorities, plans, accountability and verification systems, and have excellent communication and outreach - but if we fail to fund and implement on-the-ground and in-the-water conservation and BMPs, then the NRS will fail and our environment and economy will suffer.

We strongly recommend that the NRS and governing bodies utilize an active and robust wetland conservation program to reduce nutrients and sediments. We encourage the partnering with NGOs like Ducks Unlimited to put more and better wetlands/BMPs back on the landscape, utilizing a host of existing programs such the Wetland Reserve Program, Lake Restoration Program, Conservation Reserve Enhancement Program, REAP, as well as new programs developed and funded to specifically address Iowa's nutrient issues. We welcome the invitation to work with all of the partners and stakeholders in developing this further.

On behalf of Iowa Ducks Unlimited, thank you again for the opportunity to comment. We stand ready, and will continue to work with state, federal and private partners to ensure our wetlands, soil and water resources are conserved for all to enjoy and utilize. Feel free to contact me should you have any questions. Thank you.

Sincerely,

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **3** of comment #**908**.

**Timestamp** 1/16/2013 3:00 PM

**Name** Frank Mertz

**City** Webster

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Frank Mertz

State Chairman

Cc: DU  Rebecca Humphries

DU  Jon Kruse; Mike Shannon; Kurt Dyroff; Gildo Tori

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #909.

Timestamp 1/16/2013 3:01 PM

**Name** Radin Sneider

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

- 
- While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.
  - History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.
  - The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.
  - Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.
  - The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.
  - The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

Thank you

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #910.

Timestamp 1/16/2013 3:01 PM

**Name** Tim Broer

**City** Iowa Falls

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I would like to see mandatory buffer strips along all streams, creeks, rivers, and lakes in Iowa especially as long as there are CRP payments available like there are now. Buffer strips are simple yet effective. More education needs to be done on availability and practicality of using pumps along streams to water livestock. Then livestock won't have to go down creek banks to drink from a stream. I have seen pumps in Germany that cattle pump themselves with their nose. I would like to see a ban on lead fishing sinkers in Iowa. This should be simple because steel sinkers are readily available. The DNR has tried to encourage the use of steel but it isn't happening because lead is still readily available too.

**Name** R Hayne**City** Fairfield**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

To All the Organizations working on Water Pollution Strategies:

Below is the statement made by the Environmental Working Group...they have all the facts and say it better than I can myself.

HOWEVER, I do want to add the point that having lived in OH -working in Agriculture, lived in IN - growing up on a mixed small family farm, then moving to rural IA... in each state for around 20 yrs apiece...I can say that I have NEVER seen such filthy water as we have here in IA!! Never in all my years in those other states was it too dirty to swim in a pond or lake like it is here. Never did I hear of raw city sewage running into rivers! It is time to enforce the rules in place! It is time to fine those who cause the problems! It is time to shut down the businesses, municipal plants, farms or any other polluters to prevent further damage. It is not the responsibility of taxpayers to clean the water...it is the responsibility of the polluters themselves! It is that SIMPLE... This is important not only for Iowa, but for all those down stream from our state!

"While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

- History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.
- The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.
- Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.
- The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.
- The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions."

Please clean up our water!

R Hayne

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #912.

Timestamp 1/16/2013 3:11 PM

**Name** Seth McCaulley

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

With voluntary conservation our family has implemented buffer strips around our cattle lots and in areas that potentially would have high erosion.

Our farm isn't the same as every other farm and a cookie cutter approach of one size fits all conservation would be a disaster. Seth McCaulley

**Name** Suzy Friedman  
**City** Washington  
**State** District of Columbia

Providing comment on the following sections:

<input checked="" type="checkbox"/> Executive Summary	<input checked="" type="checkbox"/> Nonpoint Source
<input checked="" type="checkbox"/> Policy	<input type="checkbox"/> Point Source

Secretary Northey, Iowa Department of Land Stewardship  
 Director Gipp, Iowa Department of Natural Resources  
 Dr. Lawrence, Iowa State University  
 Nutrient Reduction Strategy  
 ANR Program Services  
 2101 Agronomy Hall  
 Ames, Iowa 50011-1010

January 16, 2013

Dear Secretary Northey, Director Gipp and Dr. Lawrence:

Environmental Defense Fund (EDF) appreciates the opportunity to provide our recommendations and comments on Iowa's draft Nutrient Reduction Strategy. Iowa, like all the Upper Mississippi River Basin states, faces significant challenges in delivering the agricultural nutrient reductions needed to achieve the goals laid out by the 2008 Gulf Hypoxia Action Plan. That plan seeks an ambitious but necessary goal of at least a 45% reduction in nitrogen and phosphorus loading to the Gulf of Mexico. In addition, achieving this goal will deliver significant reductions in nutrient loading that will benefit and protect Iowa's local water quality and drinking water supplies.

EDF applauds Iowa's leadership in being the first of the twelve Mississippi River states to advance a statewide nutrient reduction strategy, as called for under the Gulf Hypoxia Action Plan, and in taking a science-based, collaborative approach that focuses on all sources of nutrient loading. Iowa has a proud legacy as a leader in pioneering practices to address agricultural nutrient pollution, from wetlands sited and designed to trap and treat tile drainage water to adaptive nutrient management.

However, Iowa is unlikely to meet its nutrient reduction goals unless this conceptual strategy is quickly followed by action on-the-ground. Accordingly, we urge you to lay out a clear framework for implementing the Nutrient Reduction Strategy by:

1. Providing a robust strategy and time frames for developing watershed-scale plans that target the most effective practices to the acres that need them most to increase cost effectiveness and impact, set specific nutrient reduction goals, and establish baselines regarding nutrient loading and practice implementation;
2. Developing a clear process for documenting implementation;
3. Advancing innovations in research, demonstration, education and outreach; and
4. Developing a strategy to provide sufficient funding from all sources to implement the right practices in the right places at the watershed level.

While Iowa's Nutrient Reduction Strategy addresses both point sources and nonpoint sources, our comments below focus solely on the nonpoint source strategy, addressing each of the five categories of nonpoint source policy recommendations individually below.

#### I. Setting Priorities: Implementing the Iowa Nutrient Reduction Strategy at the Watershed-Scale

The EPA Recommended Elements of a State Framework for Managing Nitrogen and Phosphorus Pollution instructs states to prioritize 8 digit HUC watersheds on a statewide basis for nitrogen and phosphorus loading reductions in light of the best available scientific information and to prioritize implementation of watershed-scale nutrient reduction strategies in high priority 12-digit HUCs within the larger 8 digit HUCs. The Iowa draft Nutrient Reduction Strategy points to an existing priority watershed identification process that factors in nutrient delivery as well as other issues, including "sediment delivery and flooding" (Sec1.1 at 15). The draft plan provides that the major 8 digit HUCs will be identified within a year by the Water Resources Coordinating Council (WRCC) in consultation with the Watershed Planning Advisory Council. Given the urgency and magnitude of the environmental challenge of addressing nutrient pollution, the existence of ongoing Iowa watershed planning efforts, and the availability of scientific analysis, such as SPARROW, showing watershed nutrient contribution, we strongly suggest shortening this timeframe for major watershed selection to 2-3 months. The Nutrient Reduction Strategy indicates that after selecting the major target watersheds, the WRCC, in consultation with the Watershed Planning Advisory Council, will then select high priority 12-digit HUC subwatersheds within these major 8 digit HUC watersheds. It is unclear what the timeframe will be for 12-digit HUC selection. We strongly recommend identifying and announcing these high priority subwatersheds as expeditiously as possible and certainly within a year. We also recommend providing the public with a list of the selection criteria for the 8 digit HUCs and the high priority 12-digit HUC watersheds within them and providing an opportunity for public comment on watershed selection.

We strongly suggest providing time frames and expectations as well as setting clear roles and responsibilities for development of watershed-scale plans at the high priority 12-digit HUC level. There should be ample opportunity for public participation and comment in development of these watershed-scale plans. This will not only help ensure a broad range of perspectives and innovative thinking goes into the plans, it will also create a higher level of buy-in at the local level.

It is also critical that these watershed-scale plans make the best use of limited cost-share program dollars by targeting the right practices to the right places based upon the best available science and information. Specifically, in agricultural areas/watersheds, it is critical to focus on three key opportunities to increase nutrient reductions from agriculture: significantly improved impact from 1) investments in nutrient management planning and implementation, 2) investments in wetlands, buffers, and other filters in the agricultural landscape, and 3) innovative strategies to advance expanded technical assistance and leverage cost share program dollars. Our recent study, "Thinking Like a Watershed: Midwest agroecosystems and hypoxia in the Gulf of Mexico" (attached) demonstrates that employing a mix of in field nutrient management practices and wetlands, buffers and other filters in agricultural watersheds throughout the Upper Mississippi River Basin watershed would be a cost effective approach to reducing agriculture-related nutrient pollution to the Gulf of Mexico. Similarly, while not recommendations, the Iowa Nutrient Strategy scenarios demonstrate that implementing infield nutrient management practices and wetlands, buffers and other filtering practices at the watershed scale in high priority watersheds would be a successful and cost effective approach to meeting Iowa's nutrient reduction goals. It is critical that the strategy for developing watershed-scale plans ensures that this "thinking like a watershed" approach is taken; that watershed scale plans are developed at the local level in high priority HUC digit 12 watersheds that target precious resource dollars to implementing in field practices and filtering practices where they are needed most. For example, Iowa CREP wetlands are highly effective at reducing nitrogen loading from upstream watersheds typically comprising loadings from multiple farms. Not every farm has an appropriate site

**Name** Suzy Friedman  
**City** Washington  
**State** District of Columbia

**Providing comment on the following sections:**

<input checked="" type="checkbox"/> Executive Summary	<input checked="" type="checkbox"/> Nonpoint Source
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for an Iowa CREP wetland; their effectiveness hinges on constructing these wetlands in geographically appropriate locations where landowners are willing.

For agricultural watersheds or areas, the Nutrient Reduction Strategy further prioritizes: 1) focusing conservation programs; 2) combining in-field and off-field practices; 3) implementing small watershed pilot projects at the 12-digit HUC scale; and 4) exploring opportunities for nutrient trading and other innovative approaches. First, we agree that it is important to focus conservation program outreach and implementation. In addition, we believe it is important to analyze where the existing barriers are to enrollment and to prioritize addressing them. Second, we strongly support focusing on in-field and off-field practices. As the two-year analysis shows, a high level of implementation of both in field management and off-field filtration practices, such as treatment wetlands, is needed to meet nutrient reduction goals. Third, the Nutrient Reduction Strategy indicates that local stakeholders will, in conjunction with other partners, such as USDA, develop small watershed pilot projects (Sec 1.1 at 18). We strongly encourage providing further information. For example, will a request for proposals (RFP) be issued to and technical assistance funding provided to prompt and support local development of these watershed projects/plans? It is also unclear what the expectations are for these "pilot projects." We urge you to set a goal of developing watershed-scale plans/projects to address agricultural nonpoint pollution in all of the high-priority 12 digit HUC sub-watersheds in which this is a significant source of nutrient contribution. The term "pilot" should not be interpreted to mean that it is sufficient to pursue this approach in a few 12-digit HUC watersheds. We also urge you to provide local stakeholders with a framework for developing science-based suites of practices to address agricultural nonpoint pollution at the 12-digit HUC watershed scale, giving them a ready way to work with farmers to use the scientific information provided by the Plan and to get the right practices in the right places.

Finally, we strongly support Iowa's interest in exploring innovative approaches that can leverage conservation program investment. This is an exciting area and could provide a meaningful way to scale up implementation of some of the off-field practices, like treatment wetlands. As the Plan notes, these practices can entail relatively large upfront costs, but have low annual costs and long practice lives, resulting in low price per pound of nutrient removal. We strongly encourage Iowa not only to explore nutrient trading, but also to foster options for the agricultural community to help defray the initial up-front costs of treatment wetlands and other filtering practices through tax-deductible contributions to an entity designed to support IA CREP or other treatment wetland implementation. For example, upstream farmers who would benefit from installation of a CREP wetland by their downstream neighbor should have an easy way to financially contribute to this conservation work and to receive recognition for their stewardship. Such recognition could take a variety of forms, including helping farmers meet emerging supply chain criteria for soybeans and corn sourced in an environmentally sustainable way. State agencies should also favorably regard participation by upstream farmers in defraying the costs of wetland or other treatment installation when setting load allocations or other water quality expectations.

## II. Documenting Progress

Creating and implementing a strong framework for tracking, evaluating, and, in light of lessons learned, revising watershed scale approaches over time is essential to ensuring the success of Iowa's efforts to meet nutrient reduction goals. With regard to agricultural areas/watersheds, we urge Iowa to:

- Further develop baseline understanding of nutrient inputs and practice implementation. We urge you to work with the agricultural community, agency experts, and conservation organizations to develop a framework to balance public need to know with agricultural business confidentiality concerns;
- Identify existing and further develop new cost-effective metrics for real-time evaluation of practice effectiveness. For example, metrics for how practices involved in nutrient management are changing management of nutrients;
- Identify and develop metrics that are spatially relevant. For example, metrics for filtering practices should provide insight into how much flow from the upstream contributing watershed is being treated. An Iowa CREP wetland, for instance, typically treats agricultural drainage from several farms; and
- Dedicate a funding stream and staffing resources for verification of practice implementation, including compliance and fulfillment of practices included in cost share contracts to ensure those dollars are being used for real impact.

Improving the ability to document nutrient reductions and improvements in management and conservation practice implementation is essential. The public sector support for continued funding depends upon being able to document results, and agricultural community support and implementation is also dependent upon being able to make a clear, convincing case that these investments are producing results.

## III. Research and Technology

With respect to agricultural areas/watersheds, the Nutrient Reduction Strategy emphasizes the importance of developing "new technologies and creative solutions for nutrient reductions are needed to deliver and optimize implementation at full landscape scale" (Sec. 1.1 at 18). As we discuss more fully below under Funding, we recognize and agree that creative solutions are needed in order to get the suite of existing conservation tools implemented at a landscape scale. This is particularly true for filtering strategies, such as treatment wetlands, that provide dramatic nutrient reductions and are highly cost effective, but require a substantial initial upfront investment in construction costs and land retirement. While there is farmer interest in filtering tile drainage water (the Iowa CREP has a long wait list), rising costs – particularly rapidly escalating land costs – have constrained enrollment capacity. Currently, the Iowa CREP can only afford to enroll 2-3 wetlands a year. Fresh approaches are needed to leverage state and federal public investment. Such creative solutions could include participation by farmers who are upstream or otherwise within the contributing watershed to a planned wetland voluntarily contributing to help fund these practices through either tax deductible contributions to suitable 501(c)(3) charitable organizations or possibly as deductible business expenses provided to 501(c)(5) organizations.

We agree that research into new technologies can also be very helpful in reducing nutrient contribution from agricultural nonpoint sources. Further research offers the opportunity to more fully understand the strengths and challenges of potential new practices. For example, further research into directing tile into saturated buffers can provide valuable insights into appropriate siting criteria and can avoid unintended adverse consequences, such as practice failure. We agree that it is vitally important to dedicate sufficient funding to unbiased, peer-reviewed research of these potential new technologies. While we welcome and support such research efforts, we note that the existing mix of in field practices, including adaptive nutrient management, conservation tillage, and cover crops, and filtering practices, including wetlands designed and sited to treat tile drainage water, can, as demonstrated by the Nutrient Reduction Strategy scenarios, meet the nutrient reduction goals if they are implemented at the landscape scale.

Strengthen Outreach, Education and Collaboration



Name Suzy Friedman

City Washington

State District of Columbia

Providing comment on the following sections:

<input checked="" type="checkbox"/> Executive Summary	<input checked="" type="checkbox"/> Nonpoint Source
<input checked="" type="checkbox"/> Policy	<input type="checkbox"/> Point Source

We agree that implementation of the Nutrient Reduction Strategy will require stronger outreach, education and collaboration, including "identifying new and enhanced ways for the private sector to provide leadership, new technologies and services to reduce nutrient transport" (Sec. 1.1 at 18). It is critical that private sector leadership and agricultural community stewardship extend to addressing the financial issues involved in implementing in field practices and filtering strategies at the watershed scale. Outreach and education are of limited utility if there is not adequate opportunity to participate in cost share programs due to limited financial resources; this is, of course, a critical barrier to implementation with regard to filtering practices that while highly effective, often involve significant upfront costs in construction and land.

We strongly agree that certified crop advisors (CCAs) can be an important partner. The new educational program offered through the American Society of Agronomy on the 4 Rs and adaptive management is a key opportunity to increase the level of technical knowledge on this critical practice and a crucial opportunity to enlist CCA support in providing outreach to their clients. We recommend that Iowa make a priority of helping to promote such educational opportunities, such as by creating a rewards/acknowledgement program for CCAs who take priority courses in the 4 Rs and adaptive nutrient management and who use what they learn to help farmers improve management. Iowa should reach out directly to state and local CCA associations and to agricultural retail entities to engage their support, involve them in advancing solutions and to provide transparency.

#### Funding

Environmental Defense Fund believes that it is critical to advance water quality while maintaining the economic viability of agriculture. The Iowa Nutrient Reduction Strategy provides an important opportunity for agriculture to assume a greater leadership role in addressing nutrient runoff incidental to agricultural production. Given the magnitude of the nutrient reductions Iowa needs to make, the difficult economic times for the public sector at all levels, and today's high commodity prices and rapidly rising agricultural land values, it is critical that 1) maximum benefit be provided by each dollar invested in the nutrient reduction strategy; and 2) the private sector, particularly agriculture, contribute to leverage and further public sector investment. The draft Nutrient Reduction Strategy already provides for near term recommendations to the legislative and executive branches of state government regarding use of existing funding sources and, where applicable, reallocation of existing funding sources to fund implementation of the strategy (Sec. 1.1 at 19), but it is critical to grow the overall funding for implementation.

Sufficiently funding implementation of the Nutrient Reduction Strategy is the crux of the challenge of successfully reducing nutrient pollution. The draft Nutrient Reduction Strategy provides practice cost effectiveness data and scenarios that show that the nutrient reduction goal is achievable provided there is sufficient support and funding. While the scenarios were not intended as recommendations, they do provide helpful rough benchmarks as to likely total cost – \$1.2 to \$4 billion. This is an ambitious but achievable goal if a sufficiently ambitious and practical mix of strategies is employed to grow the total resources available to implement the Nutrient Reduction Strategy.

As discussed above, some of the most effective and cost effective practices in reducing nutrient delivery are filtering practices, particularly treatment wetlands, but often these practices entail significant upfront costs. Iowa and USDA Farm Service Agency have made a monumental contribution to the challenge of addressing row crop agriculture-related nutrient pollution in the UMRB through the Iowa CREP which seeks to construct wetlands situated to trap and treat row crop agricultural drainage water, cutting nitrogen/nitrate loads by roughly 50-90%. Iowa State University modeling predicts that if sufficiently implemented throughout the UMRB, these constructed treatment wetlands could cut nitrogen loading to the Mississippi River and Gulf of Mexico by 30% (Crumpton, W.G., G.A. Stenback, B.A. Miller, and M.J. Helmers. 2006. Potential Benefits of Wetland Filters for Tile Drainage Systems: Impact on Nitrate Loads to Mississippi River Subbasins). The scenarios in the draft Nutrient Reduction Strategy call for construction of approximately 4,000-12,000 IA CREP wetlands. These wetlands are also cost effective – cost per pound. However, given the significant initial construction costs (roughly \$3,000 per acre) and rapidly rising land Iowa cropland values, the pace of IA CREP enrollment has dropped to 2-3 wetlands per year. Since the Iowa CREP was launched in 2001, 66 IA CREP wetlands have been constructed. At the current pace, it would take over a thousand years to construct a sufficient number of these wetlands at landscape scale in Iowa. Given the proven track record of this filtering practice in dramatically cutting nutrient loads when sited properly, it is critical that sufficient funding be allocated by state, federal and private partners to ramp up the pace of implementation. We strongly suggest:

- Significantly increasing the state appropriation for IA CREP funding (we note that while the Nutrient Reduction Strategy accurately notes that Iowa CREP budget held steady in FY 12 and FY 13 at \$1,000,000 per year, this is a significant drop from \$1,500,000 funding level in FY11);
- Increasing the USDA incentives to better leverage state investment and to allow state funding to extend to many more wetlands per year;

and

- Providing innovative opportunities for private investment and donations to CREP funding, such as encouraging the agricultural community to make tax-deductible charitable contributions defraying the cost of wetland construction and land costs.

While an important practice, the treatment wetlands are an example of the larger funding challenge.

Like CREP, many NRCS cost share programs are oversubscribed. Additional funding is needed, for example, to meet the need for in field practices, like adaptive management and cover crops.

Finally, as discussed above, in light of the magnitude of this financial challenge, it is critical to try innovative new approaches to leverage public sector resources. We strongly encourage Iowa not only to explore nutrient trading, but also to create opportunities for:

- Tax-deductible business expenses for payments to 501(c)(5) agricultural or horticultural organizations for farmer or agricultural landowner funding that goes to pay for soil samples, etc;
- Tax-deductible contributions to 501(c)(3) organizations for constructed agricultural drainage water treatment wetlands or other wetlands, buffers or filtering practices that reduce nutrient loading.
- Supply chain or other private sector initiatives that recognize farmers and agricultural landowners not only for implementation of conservation on their lands but also for funding conservation. For example, a farmer may not have a suitable site for a treatment wetland on his or her land, but may he or she should be recognized if they chose to help fund construction of a neighbor's treatment wetland. Supply chain or other similar initiatives could, perhaps, be tied to the proposed farmer recognition program (Sec 1.1 at 19).
- Working with drainage districts to incorporate treatment technologies and beneficial design criteria into new, upgraded or replacement of aging drainage infrastructure.
- Direct nutrient trades as well as potentially other credit markets or initiatives for such co-benefits as flood storage, wildlife habitat and carbon storage.

We greatly appreciate this opportunity to provide our comments on Iowa's draft Nutrient Reduction Strategy. We would welcome an opportunity to discuss these recommendations and provide assistance to the state in achieving its water quality goals.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 4 of comment #913.

Timestamp 1/16/2013 3:14 PM

**Name** Suzy Friedman  
**City** Washington  
**State** District of Columbia

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input checked="" type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Sincerely,

Suzy Friedman, Director, Agricultural Sustainability  
Environmental Defense Fund  
1875 Connecticut Ave, NW, #600  
Washington, DC 20009  
sfriedman@edf.org, 202-492-1023

cc:

Ann Mills, USDA Deputy Under Secretary for Natural Resources  
Jason Weller, NRCS Chief  
Tom Christensen, NRCS Regional Conservationist for the Central Region  
Nancy Stoner, Assistant Administrator for Water, US EPA  
Susan Hedman, Regional Administrator for Region 5, US EPA

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #914.

Timestamp 1/16/2013 3:17 PM

**Name** Lohrainne Janell

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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1. While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

2. History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

3. The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

4. Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

5. The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

6. The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

I love kayaking and have a group of friends who like to kayak on Iowa's rivers. However, the rivers are really dirty. Some of my friends will not go on Iowa's rivers any more because of the chemical runoff.

Please do something that will actually clean up the rivers once and for all to make them safe for kayakers like myself and others.

Thanks.

Lohrainne Janell

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #915.

Timestamp 1/16/2013 3:20 PM

**Name** Robert C Simmons

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I'm the fifth generation owner of farm land in the Walnut Creek drainage north of Fairfield, in Jefferson County.

If I understand the proposed nutrient reduction strategy at all, it relies on the same voluntary participation assumptions that have failed for years to stop the pollution of Iowa's wells and streams. I believe it was Einstein who said that trying the same procedure over and over and expecting a different outcome, is a symptom of mental distress.

Your proposals put the cost of cleanup on the backs of Iowa taxpayers. It's the huge, profitable factory-style farms, particularly CAFO's, that are causing the problem. They should bear the cost of remediating the damage. In almost any other enterprise in the U.S., the polluter is assessed the cost of cleaning up.

The proposals appear to include no deadlines for implementation and no proposals for what to do until the (unstated) deadlines are met. In other words, the strategy appears to be not at all serious.

Please try again. It is so distressing to see our surface and well waters become the most polluted of any state.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #916.

Timestamp 1/16/2013 3:23 PM

**Name** Michael Borden

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Agriculture is a major contributor to our state's water pollution. Please focus on agriculture's role and responsibilities in your mandates.

•Voluntary measures are ineffective. There needs to be a clear protocol for protecting our precious waterways.

• The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

•The State plan needs to set minimum standards of care that farmers should follow with clear and strict timelines that are protective to the environment not the farmer.

The State plan needs to clearly define how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #917.

Timestamp 1/16/2013 3:30 PM

**Name** Bruce Nieman

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I hope we can count on you to support a science based approach to nutrient management. I would like to see a small amount of our budget surplus go into funding of the nutrient reduction strategy. If we give consistent longterm attention to this issue we will be successful. Bruce Nieman

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #918.

Timestamp 1/16/2013 3:41 PM

**Name** Kenneth Hogle

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am a fourth generation Grundy County farmer who takes the responsibility of caring for my farmland (and all land for that matter) very seriously. I strongly support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I currently have several miles of grassed waterways and filter strips on my own ground and that of landlords as well. These were all installed and maintained on a voluntary basis with government cost-share assistance. These programs have worked well.

Please fund the Iowa Nutrient Reductions Strategy as well as the other state cost-share conservation programs. Kenneth Hogle

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #919.

Timestamp 1/16/2013 3:50 PM

**Name** Nathan Sarver

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would like to express my support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I would like to urge lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

I have already enrolled acres in the buffer strip program several years ago. I have been adding grass waterways and several terraces on my own as well as refurbishing old ponds.

Thank you for your time and consideration. Nathan Sarver



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #920.

Timestamp 1/16/2013 3:57 PM

**Name** Caroline Hazelton

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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• The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #921.

Timestamp 1/16/2013 3:59 PM

**Name** Caroline Hazelon

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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• Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #922.

Timestamp 1/16/2013 4:10 PM

Name Patti Edge

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

This afternoon I would like to express my support and urge your support for funding the Iowa Nutrient Reduction Strategy.

A grass roots, local approach to managing nutrient movement and/or loss is necessary for an effective and efficient long term solution. Iowa's agriculturists have long been leaders in conservation, on a voluntary basis. Implementation of irrelevant regulations from a distance is inefficient and most likely ineffective.

As a third generation family farmer, few things are more important than the land with which we are blessed to make a living. Our family operation has many conservation practices in place, for instance: adequate waterways, buffer strips, no-till crop rotations or minimal tillage for maximum residue coverage. Many of these are voluntary, to protect our investment.

In short, voluntary conservation measures are prominent in Iowa agriculture. Study for any form of regulation is best served by those that are familiar with the "Iowa-scape", not far removed parties.

Again, I ask your support of funding for the Nutrient Reduction Strategy. Patti Edge

**Name** Susanna McCan MacGregor**City** Fairfield**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

Dear comment reviewers,

I believe that it is very important to reduce farm runoff into Iowa's waters and otherwise reduce the agricultural pollution load in Iowa. At this point, simply living in the midwest is considered a risk factor for cancer, because of agricultural pollution in the environment. This has personal meaning for me, because my 23-year-old daughter is being treated for cancer at the University of Iowa Hospitals and Clinics. Twice a week, I see the long rows of chemo delivery chairs lined up along the halls at our flagship hospital. Many of the many cancer patients appear to be Iowa farmers. I'm sure most of them are Iowans. In my youth, cancer was a very rare disease. We in Iowa need to reduce agricultural pollution for the sake of the health of our citizens and for the sake of environmental balance.

- While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.
- History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.
- The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels. Most of Iowa is now farmed by large corporations. I AM TIRED OF BIG CORPORATIONS MAKING THEIR MONEY OFF THE BACKS OF THE ENVIRONMENT, WITH PEOPLE'S HEALTH AS THE COLLATERAL DAMAGE, EXPENSES FOR ENVIRONMENTAL AND HEALTH COLLATERAL DAMAGE PASSED ON TO INDIVIDUALS AND THE GOVERNMENT--privatizing the profits and socializing the costs. IT IS ESPECIALLY GALLING WHEN CORPORATIONS FIGHT PAYING APPROPRIATE TAXES that could at least begin to compensate for the tragic collateral damage.
- Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow. WE NEED CLEAR, SPECIFIC STANDARDS THAT ARE ENFORCED, even if it costs the corporations a little more money.
- The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.
- The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

I deeply support farmers growing healthy food for people. I do NOT support subsidizing the greed of corporate "persons" on the backs of the government and the health of actual human "persons" because of weak regulation.

PLEASE, let's not leave it to the foxes to guard the hen houses!!

Thank you very much for your consideration.

Sincerely,  
Susanna McCan MacGregor  
641-469-3735

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #924.

Timestamp 1/16/2013 4:17 PM

**Name** susan arnold

**City** fairfield

**State** iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The state's proposed strategy falls short:

- It relies entirely on the same voluntary approaches for agriculture that have failed to clean up Iowa's water and thereby polluting the lives of everyone.
- It puts most of the financial burden on taxpayers, even though profitable farm businesses are causing most of the problems.
- It fails to set any common sense standards to restrict a handful of the most polluting farming practices.
- The strategy outlines no timelines, interim goals or means of measuring annual progress toward reducing agricultural pollution.
- It includes no explanation of how the plans will be implemented, how problems will be prioritized or who will make these decisions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #925.

Timestamp 1/16/2013 4:19 PM

**Name** Susan Arnold

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #926.

Timestamp 1/16/2013 4:20 PM

**Name** Michael Murphy

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The state's proposed strategy falls short:

- It relies entirely on the same voluntary approaches for agriculture that have failed to clean up Iowa's water and thereby polluting the lives of everyone.
- It puts most of the financial burden on taxpayers, even though profitable farm businesses are causing most of the problems.
- It fails to set any common sense standards to restrict a handful of the most polluting farming practices.
- The strategy outlines no timelines, interim goals or means of measuring annual progress toward reducing agricultural pollution.
- It includes no explanation of how the plans will be implemented, how problems will be prioritized or who will make these decisions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #927.

Timestamp 1/16/2013 4:45 PM

**Name** Paul Horsfall

**City** Dubuque

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I believe this plan is a good start. Atleast it is getting the attention of the Ag. community. Finally they admit to 85-90% of the problem in our watersheds.

However, I do have a problem with the term voluntary used in the non point source plan. The Ag. community is responsible for the majority of the nutrients we want to remove and other than plan reviews and reporting there is no way to force farmers to comply.

Without some type of enforcement or control,the plan is set to fail or our watersheds will remain as they are,or get worse with the high price of corn & beans.

90% of the hypoxia problem in the Gulf is due to non point sources and 10% is due to point sources. Wastewater plants in Iowa probably account for less than 1/2 of 1% of the nutrient problem in the Gulf. Forcing aprox. 170 wastewater plants in Iowa to spend over one billion dollars to clean up such a small amount of the problem is a hardship imposed on communities, while the majority of the pollution is from non point sources and will be voluntary. There must be a strategy to control and monitor the Ag. people in all the watersheds in Iowa and not just wastewater and industrial point sources.

The term "Voluntary" should be removed from the non point source plan.

Paul Horsfall

575 Sapphire Cr.

Dubuque Ia. 52001



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #928.

Timestamp 1/16/2013 5:09 PM

**Name** Lorraine

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

- History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.
- The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.
- Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.
- The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.
- The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #929.

Timestamp 1/16/2013 5:11 PM

**Name** Tim Peelen

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Let us keep our practices voluntary for conservation so that we can use the practice that is best suited for each particulare farm. If the government is serious about trying to reduce nutrient runoff then lets fund the program fully, so that we do the work properly that needs to be done.

On my operation we have put in 3 miles of grass waterways, over a mile of buffer strips , planted alfalfa on sandy spots to soak up nutrients.

We make sure all manure is knifed in when applied and only when the tempertuare is cool enough to prevent volitilazation. We leave as much residue on top of the soil as is practical for our operation. Tim Peelen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #930.

Timestamp 1/16/2013 5:16 PM

**Name** John Pearson

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I feel it is vital the Iowa Legislature fully fund the Iowa Nutrient Reduction Strategy. This voluntary plan is the first in the nation to be developed through cooperation between state government and higher education. The Iowa Department of Agriculture and Land Stewardship and the Iowa Department of Natural Resources developed the plan. Iowa State University helped by contributing a science assessment to the plan. It is my belief this voluntary plan will succeed in cleaning our surface waters and reduce nutrients flowing to the Gulf of Mexico. It is important that Iowans control this issue. We do not need the federal government handing down a one size fits all solution, which may be totally wrong for Iowa. Conservation is vital and necessary in this day and age. Iowa has the chance to lead the nation in this area. Please vote yes on this issue. John Pearson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #931.

Timestamp 1/16/2013 5:34 PM

**Name** Patricia Draznin

**City** fairfield

**State** iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The state's proposed strategy falls short:

- It relies entirely on the same voluntary approaches for agriculture that have failed to clean up Iowa's water and thereby polluting the lives of everyone.
- It puts most of the financial burden on taxpayers, even though profitable farm businesses are causing most of the problems.
- It fails to set any common sense standards to restrict a handful of the most polluting farming practices.
- The strategy outlines no timelines, interim goals or means of measuring annual progress toward reducing agricultural pollution.
- It includes no explanation of how the plans will be implemented, how problems will be prioritized or who will make these decisions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #932.

Timestamp 1/16/2013 5:35 PM

**Name** Dean Draznin

**City** fairfield

**State** iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

---

The state's proposed strategy falls short:

- It relies entirely on the same voluntary approaches for agriculture that have failed to clean up Iowa's water and thereby polluting the lives of everyone.
- It puts most of the financial burden on taxpayers, even though profitable farm businesses are causing most of the problems.
- It fails to set any common sense standards to restrict a handful of the most polluting farming practices.
- The strategy outlines no timelines, interim goals or means of measuring annual progress toward reducing agricultural pollution.
- It includes no explanation of how the plans will be implemented, how problems will be prioritized or who will make these decisions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #933.

Timestamp 1/16/2013 5:45 PM

**Name** Sharon Starr

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

- History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.
- The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.
- Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.
- The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.
- The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #934.

Timestamp 1/16/2013 5:56 PM

Name Steve Sonntag

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

As we embark on a new year and we look to the future of agriculture production and water quality I urge state lawmakers and other involved state leaders to adequately fund the Iowa Nutrient Reduction Strategy and other conservation cost-share programs to benefit our valuable farmers and our increasing level of agricultural production in Iowa. We need to protect our water and other natural resources and at the same time increase our level of production in order to keep up with the growing demand on Iowa farmers for food, fiber, and fuels that are a product of our great agricultural production system.

I think it is important for us to maintain voluntary conservation practices for our farmers in conjunction with science-based nutrient reduction strategies that will protect our natural resources and allow our farmers to continue producing at our prolific levels. Thank you for considering my input on this topic. Steve Sonntag

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #935.

Timestamp 1/16/2013 6:06 PM

**Name** Rodney Collins

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing to encourage you to support the voluntary conservation practices. I have been farming for over 20 years and the conservation practices that I use are very beneficial to the land, environment and my operations. Farmers know what needs to be done and when. When we involve the government to implement these plans it takes to long and the cost way to much.

Thanks for considering these practices. Rodney Collins



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #936.

Timestamp 1/16/2013 6:16 PM

Name Amy Glick

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

For many years our family farm has practiced no-till conservation and has seen many benefits. In most recent years we have been able to decrease the amount of nitrogen units applied and still able to increase our yeilds. We were able to do this by utilizing science based research provided to us by our fertilizer company.

By supporting this effort now, more farmers can learn and implement practices like these to continue to keep watersheds clean before the EPA steps in and requires it be done at a much higher costs and without our say in what effective and effiecient practices should be. Amy Glick

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #937.

Timestamp 1/16/2013 6:29 PM

**Name** toni labagh

**City** fairfield

**State** iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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It is time to step up and stop the further polluting of lowas waters by the large farms whose practices literally are poisoning our waters, and hold them accountable, placing the responsibility of clean-up where it belongs, on those who are doing the polluting!

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #938.

Timestamp 1/16/2013 6:42 PM

**Name** Suzanne Clifton

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Dear IDALS, IDNR, and ISU,

I believe the current policy and strategy are flawed and propose that you amend the policy and strategy to implement the points below. Those responsible must take responsibility and demonstrate leadership, intelligence, and fairness in regards to our water supply.

- While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.
- History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.
- The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.
- Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.
- The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.
- The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

Sincerely,  
Suzanne Clifton

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #939.

Timestamp 1/16/2013 6:45 PM

Name John Sander

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

A lot of time and money has been spent developing the Iowa Nutrient Reduction Strategy. While it is not perfect and will likely need some changes, it is a good starting point in addressing efforts to reduce P and N losses from urban and agriculture locations. Most of the recommended practices cost a lot of money and the State of Iowa should help with cost-share funds, since these practices would benefit all Iowans, not just farmers. We need funds not only for cost-share but to fund research on the best and most cost-effective ways to reduce soil erosion and nutrient runoff. On our farm, we have put in a lot of terraces, grass waterways, buffer strips and contour farming as well as no-till and cover crops-some with cost-share and some on our own. I hope you support the efforts to implement the nutrient reduction plan. Thank you. John Sander

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #940.

Timestamp 1/16/2013 6:48 PM

Name Polly Miller

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I strongly urge lawmakers to adopt the science-based nutrient reduction strategy. Iowa farmers are responsible businessmen & women who do not want to damage the ground from which they make their living - nor do they want to see legislation that will choke the common sense approach our lawmakers have used in the past. We do not want to go down the same road as some other states have gone down, by implementing restrictive regulations.

We will also need to adequately fund this program & other cost-share programs to encourage implementation & continuation. Nothing encourages a person to adopt something new, than a monetary cost-share program. Even in these lean times, this will be to the benefit of one our state agricultural industry.

Thank you. Polly Miller

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #941.

Timestamp 1/16/2013 7:02 PM

**Name** Benjamin Butcher

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

As an Iowa Livestock farmer I feel it is very important to have a "science-based" nutrient reduction plan. One that recognizes voluntary conservation practices to help keep agriculture production in this state. Iowa's economy is dependent on the ag sector, we must continue to help support it.

Conservation is a very important part of every Iowa farm. The state needs to continue to help farmers by cost sharing on conservation projects. Without this help for the state some major conservation projects will not be completed.

Our farm has done many voluntary conservation projects over the years including tiling, terracing, and containing cattle lot run off. We will continue to practice good conservation by implementing Maure Management Plans and reducing the amount of fertilizer to grow a bushel of corn. Benjamin Butcher

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #942.

Timestamp 1/16/2013 7:19 PM

**Name** Mike Coleman

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am young farmer that believes in conservation. I have done a lot of fertilizer research on my farm through the ON FARM NETWORK. I urge you to fund the nutrient reduction strategy, as well as other cost share programs. I believe that science based system is the best. Mike Coleman

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #943.

Timestamp 1/16/2013 7:20 PM

Name Rob Young

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

I believe a science-based nutrient reduction strategy should be implemented for the state of Iowa. Voluntary conservation practices are key to this strategies success. Iowa farmers know what is the best conservation practice for each of their farms. For example, terraces might work best on steep or rolling ground whereas buffer strips work well along creeks and rivers. Agriculture production must be maintained to keep the the local Iowa economy on it's feet!

State lawmakers should consider funding this strategy along with other conservation cost-share programs. Failure to fund these programs has delayed needed conservation projects in the past.

On our farm we utilize grass waterways, buffer strips, and predominantly terraces to control erosion and improve water quality. Iowa farmers are excellent stewards of the land and should be allowed the freedom to implement custom conservation plans that fit each of their farm's needs best. Rob Young



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #944.

Timestamp 1/16/2013 7:37 PM

**Name** Brian Krause

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would like to ask for your support with the science based nutrient reduction strategy. I would also urge lawmakers to adequately fund this strategy as well as other conservation cost share programs.

Thank-you for your help in this very important plan. Brian Krause

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #945.

Timestamp 1/16/2013 7:42 PM

**Name** Clover Calvet

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

- 
- The state's proposed strategy falls short in many ways:
  - It relies entirely on the same voluntary approaches for agriculture that have failed to clean up Iowa's water.
  - It puts the bulk of the financial burden on taxpayers, even though profitable farm businesses are responsible for the bulk of the problem.
  - It fails to set any common sense standards to restrict a handful of the most polluting farming practices.
  - The strategy outlines no timelines, interim goals or means of measuring annual progress toward reducing agricultural pollution.
  - It includes no explanation of how the plans will be implemented, how problems will be prioritized or who will make these decisions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #946.

Timestamp 1/16/2013 7:55 PM

**Name** Dean Ekstrand

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I fully support a science-based state nutrient reduction strategy. This should be a plan specific to Iowa and not imposed upon us by those not familiar with Iowa. It also should be composed of voluntary conservation practices and the strategy needs to maintain agricultural production.

We must adequately fund the Iowa Nutrient Reduction Strategy as well as other state conservation cost-share programs. In the past when these programs have not been fully funded, needed conservation projects have been delayed. Dean Ekstrand

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #947.

Timestamp 1/16/2013 7:56 PM

**Name** June Oliver

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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- The state's proposed strategy falls short in many ways:
- It relies entirely on the same voluntary approaches for agriculture that have failed to clean up Iowa's water.
- It puts the bulk of the financial burden on taxpayers, even though profitable farm businesses are responsible for the bulk of the problem.
- It fails to set any common sense standards to restrict a handful of the most polluting farming practices.
- The strategy outlines no timelines, interim goals or means of measuring annual progress toward reducing agricultural pollution.
- It includes no explanation of how the plans will be implemented, how problems will be prioritized or who will make these decisions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #948.

Timestamp 1/16/2013 8:00 PM

**Name** Valerie Barnard

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I believe that the states strategy falls short in many ways:

- It relies on the same voluntary approaches to agriculture that failed to work in the past and puts the burden on the taxpayers. It also fails to set any COMMON SENSE standards to restrict a handfull of the most polluting farming practices. There are no timelines, or means of measurinf interim progress toward reducing agricultural pollution. And lastly, it includes no explanation of how problems will be prioritized or who will make these decisons.

I am very concerned about this affecting our water and even the health of the Gulf of Mexico.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #949.

Timestamp 1/16/2013 8:05 PM

**Name** Mark Cutter

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input checked="" type="checkbox"/>	<b>Point Source</b>

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While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

- History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.
- The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.
- Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.
- The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.
- The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #950.

Timestamp 1/16/2013 8:14 PM

**Name** Alicia Johnson

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

My husband and myself find this strategy to be a very worth-while idea to fund. Voluntary conservation practices are a great way to help our environment and more are willing to comply when it is on a volunteer basis. Being forced or regulated to do so has never been found to be successful.

My husband owns his own tiling and dozers so he can help others in their conservation plans.

I feel it will be very beneficial to all to fund this Nutrient Reduction Strategy. Alicia Johnson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #951.

Timestamp 1/16/2013 8:18 PM

**Name** Matt Svoboda

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices along with the need to maintain agricultural production.

I appreciate the efforts of state lawmakers to adequately fund conservation cost-share programs for farmers and ranchers. Without these programs, some conservation projects would be financially unreachable.

As a landowner along the banks of the beautiful Wapsipinicon River, I take water conservation very seriously. With good management I plan on passing it to the next generation more improved than when it was purchased. Matt Svoboda



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #952.

Timestamp 1/16/2013 8:32 PM

**Name** Sherry Levesque

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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- Clearly, the old "solutions" have not worked and the new guidelines which mirror the old cannot be effective.

While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

- History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

- The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

Please - let's go for some practical, real solutions.

Sincerely,

Sherry Levesque

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #953.

Timestamp 1/16/2013 8:35 PM

**Name** Vincent Spain

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I encourage you to fund the Iowa Nutrient Reduction Strategy, also fund voluntary conservation practices. If the state budget is to tight take the funds from the DRN or Reap funds, they waste the money! Vincent Spain

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #954.

Timestamp 1/16/2013 8:38 PM

**Name** David Matt

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #955.

Timestamp 1/16/2013 8:51 PM

**Name** Joe Kafer

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

On our farming operation we practice notil and miniumtil. Our soil types are a sandy loam so in late May we side dress nitrogen on the corn plants because that is when the plants need it most. Its more beneficial then because the nitrogen has less of a chance of leaching into our water system. To prevent chemical run off we use buffer strips and water ways. We work with the soil conservation to keep up a good plan on our farms. I have also observed my neighbors practicing good voluntary conservation practices. Joe Kafer

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #956.

Timestamp 1/16/2013 8:55 PM

**Name** Kyle Brinkman

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

We need a science based state nutrient reduction strategy. I feel that this should be a voluntary conservation program. It is also important to maintain a high yield environment so that we can feed a hungary world. The state needs to adequately fund the Iowa Nutrient Reduction Strategy as well as the state's other conservation cost-share programs. My brother and I use N serve to stablize anhydrous. We also maintain 7 terraces that our father constructed in the 1960s. We continue to look for other ways to prevent nutrient runoff. Kyle Brinkman

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #957.

Timestamp 1/16/2013 9:07 PM

**Name** Paul Ackley

**City** Bedford

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                               **Point Source**

I am a farmer in Taylor County, southern tier, third county east of the Missouri River.

My wife and I started farming with my parents when I returned from the Army in Feb 1969.

I know a lot of good and experienced people put a lot of work into this strategy. The strategy should be simpler than it sounded when I when I watched the presentation on the internet. We started to plant some crops no-till in 1985 and went continuous no-till in the late '90's. We also raised some hay or seeded some down for grazing or hay about every year. We have installed several feet of terraces over the years. We worked with cover crops using rye in front of soybeans for almost 20 years. Starting in 2009 we have acheived 90 coverage with cover crops after the cash row crop is harvested both corn and soybeans. In this area gully erosion is the main constraint to continuous cropping.

It takes cover crops, crop rotation longer than flip/flop corn/soybeans and terraces to do the complete job. We have found cover crops to be especially profitable. They have reduced our time filling gullies and cleaning out terraces, reduced the amount of fertilizer needed, provided grazing for cattle. We have also found we can get in the field one or two days sooner in a wet year and in a dry year the cover saves moisture and keeps the soil temperature cooler. No-till planting is a no-brainer. It reduces time and fuel planting.

In this county I doubt that 30% of the acres are no-till planted, yet it is a proven practice. Tillage is a mindset. That needs to change. I feel that some of our beloved farm organizations have lead us astray in this state. I am ashamed of the attitude that some of them have taken, "prove that farmers are polluting and how much and then pay us to correct that." That's wrong-headed. I say "No-till plant and use cover crops and rotations and pay yourself." The problem is between our ears.

Our experience here would support Matt Liebman's research project results at ISU and Dick and Sharon Thompson's "On Farm Research" at Boone. We have three challenges as farmers: 1. Produce enough forever(environmentally benign at worst)Do No Harm.

2. Produce in a socially acceptable manner. 3. Profitable, it must be on its own to be sustainable.

Paul Ackley

712-621-1040

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #958.

Timestamp 1/16/2013 9:19 PM

**Name** Caroline, Rustin, Katharine, Sarah &

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Please strengthen our clean water controls, & require profitable farming corporations to clean up their acts, rather than requiring the citizens to pay for their pollution.

The strategy plan fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #959.

Timestamp 1/16/2013 9:20 PM

**Name** David Bredensteiner

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please support and adequately fund the Iowa Nutrient Reduction Strategy. I vastly prefer a science-based voluntary program that allows lowans to work on serious environmental problems while recognizing we need to support producers in our state. I am talking about supporting the producers of food, fiber, economic growth, and jobs. We already have enough efforts by the federal government and anti-animal agriculture groups to crush farmers and businesses with ever-expanding regulations. We don't need more. David Bredensteiner



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #960.

Timestamp 1/16/2013 9:24 PM

**Name** Ruth Moses

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #961.

Timestamp 1/16/2013 9:25 PM

**Name** Vernon Knaack

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

It is very important to base any nutrient management strategies on science and not the desires of environmental groups and public pressure. Most Iowa farmers have demonstrated that they are willing to work on reducing their environmental impact in regards to nutrient runoff.

Terraces, waterways, buffer strips, CRP, and no-till farming are all ways that runoff is reduced from current farming operations and those items are important tools to reduce nutrients into our waters. Our farm has adopted some of those, notably the terraces and waterways, but not every piece of ground we own needs every one of those items. Each farm has a different need in regards to protecting the environment and only the farmer who operates the land truly knows the best way to protect it. That is why one nutrient strategy for all farms is a unrealistic goal.

The funding of conservation cost-share programs is also critical to reducing nutrient run off as it encourages farmers to do the right thing with protecting the land and by funding them, the wait time is reduced.

I hope that you will think about these items when legislation is introduced for nutrient strategies and other farm related bills. Most farmers care about their land and do not need further regulations.

Thank you. Vernon Knaack

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #962.

Timestamp 1/16/2013 9:28 PM

**Name** Thomas Carson

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Nutrient reduction strategy should be based on science and achieved through voluntary conservation practices with an emphasis placed on maintaining production levels, but still achieving reduction goals. Increasing funding for cost share of conservation practices would be a good start to help achieve these goals.

I use terraces, minimum or no till, and other erosion control practices to try and alleviate the loss of my nutrients. Nutrients leaving my fields is a costly problem I would like to prevent. Thomas Carson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #963.

Timestamp 1/16/2013 9:41 PM

**Name** Kevin Sloan

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

Please adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. Kevin Sloan

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #964.

Timestamp 1/16/2013 9:59 PM

Name Bev Allen

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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We must take stronger action regarding the state's current proposal regarding excessive nutrients in our water. Many environmental groups have been working on this critical problem and it is very disappointing that their conclusions have not been taking more seriously.

Without stricter policies, the pollution of our water resources will continue and soon will be irreversible.

Some of their suggestions are noted below:

- While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.
- History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.
- The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.
- Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.
- The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.
- The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #965.

Timestamp 1/16/2013 10:25

**Name** fred rosenberg

**City** fairfield

**State** iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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i have several comments.

While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

i hope someone is listening!

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #966.

Timestamp 1/16/2013 10:36

**Name** David Royer

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy.

I voluntarily practice conservation measures on my farm such as grass waterways, terraces, ponds and seeding down steep grounds and no-til farming. David Royer

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #967.

Timestamp 1/16/2013 11:16

**Name** Marie Zenack

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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•The state's proposed strategy recommends strict new rules for cities and industry, but falls way short of addressing agriculture's contributions to the excessive nutrients in our water.

• Voluntary measures don't work. Everything falls back on taxpayers instead of farms who are causing the problems.

• In spite of the science assessment giving plenty of things farmers can do to decrease toxic run-off, the plan has no minimum standard of care for farmers to follow.

• There are no timelines, interim goals, or means of measuring progress.

•



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #968.

Timestamp 1/16/2013 11:27

**Name** Tim Kuehn

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing to express my belief in, and support of, voluntary conservation practices. I am asking you to support adequate funding of cost share programs and the Iowa Nutrient Reduction Strategy. A science based strategy, it is effective and helps protect waters and land. As a farm operator and food producer, it is important to me to do all that can be done to protect our increasingly limited natural resources. Thank you for your consideration. Tim Kuehn

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #969.

Timestamp 1/17/2013 4:30 AM

Name David Forbes

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

Please adequately fund the Iowa Nutrient Reduction Strategy and the state's other conservation cost share programs.

This is a science based program developed by the Iowa Dept of Agriculture and Land Stewardship and the Iowa Dept of Natural Resources along with Iowa State University. It is a voluntary conservation program like Iowa's other conservation cost share programs. Iowa has also been commended by the EPA for developing this program.

With those programs in place, we have voluntarily installed several miles of terraces on our land. In addition we switched to no-till practices on over 80% of our ground. With those practices we have greatly reduced soil erosion and nutrient runoff on our farm, all done voluntarily. David Forbes

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #970.

Timestamp 1/17/2013 6:16 AM

**Name** James Yenter

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

The nutrient reduction strategy is a science and technology based approach developed by the Iowa Department of Agriculture and Land Stewardship (IDALS), the Iowa Department of Natural Resources (DNR), and Iowa State University (ISU) to encourage the adoption of voluntary conservation practices that will have the greatest benefit for water quality in the state. It uses ISU research to determine which practices are most effective when applied to Iowa's unique landscapes. The strategy outlines these efforts in a scientific, reasonable and cost-effective manner, an approach supported by Farm Bureau members.

Some groups and individuals are already saying the Iowa Nutrient Reduction Strategy won't work. They believe voluntary conservation practices on farms do very little to protect water. They're calling for more regulation of farms, similar to the costly one-size-fits-all regulations imposed on farmers in the Chesapeake Bay area.

We know better! We want to continue to be part of the solution, but know that new regulations aren't the answer. James Yenter

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #971.

Timestamp 1/17/2013 6:25 AM

Name Richard Arthur

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing to express my support for state funding of the recent initiatives proposed for voluntary conservation efforts. I feel that a voluntary conservation program will have far better results and producer response. If given the chance to implement some of these procedures on my own farm I hope to be able to not only stop water erosion against our drainage ditch, but to hopefully buffer some of the nutrient loss and keep it out of the water system. To date we have implemented a grass buffer along 4 miles of exposed drainage ditch, changed our manure application practices, begun sidedressing a majority of our supplemental nitrogen, while reducing our overall nitrogen needs because of it. Tillage has been reduced, and crop protecting residue has been increased to aid in wind and water erosion control. These things are and will continue to be done voluntarily because of our desire to protect the environment. Let us continue to improve that environment without expanding the size of government and forcing unneeded regulation. Richard Arthur

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #972.

Timestamp 1/17/2013 6:42 AM

**Name** Jeffrey Moses

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Please take a comprehensive vision of the problem of groundwater pollution in your considerations.

Simple, quick fixes of problems with our natural resources usually fall short of their goals.

Water is, next to air, our most vital resource. In any consideration that involves assuring lasting purity of this resource, please focus on regulations that provide tangible targets/benchmarks, monitoring, penalties, and uncompromising standards.

Thank you,

Jeffrey Moses

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #973.

Timestamp 1/17/2013 6:53 AM

**Name** Lawrence Jacobson

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Farmers care about our natural resources and want to protect them for future generations. I urge you to fund the Nutrient Reduction Strategy, as well as conservation cost share programs. This will keep us at the forefront of using voluntary, science-based practices to improve water quality in our state. Lawrence Jacobson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #974.

Timestamp 1/17/2013 6:56 AM

Name Jay Gunderson

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

I support a science-based state nutrient strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. I use a certified agronomist to make all nutrient application recommendations. My farms are soil sampled on a rotating basis so I have current information available for my agronomist to make nutrient application recommendations. All nutrient recommendations (NPK, micronutrients & macronutrients) are based on current samples for the crop that will be planted that year.

In recent years I have evolved away from fall applied nitrogen to an in season split application of nitrogen. I apply nitrogen at planting and a later side dress application. I have also incorporated late spring nitrate testing into my operation to help fine tune nitrogen rates for my corn crop.

Another practice I have implemented is applying micronutrients, based on soil tests, matched to crop nutrient needs, at planting. I also have added foliar feeding of nutrients to my operation.

While I am not sure anyone can predict what advantages new technologies will provide in nutrient management, I intend to incorporate them into my operation over time.

I am asking that you pass legislation that will adequately fund the Iowa Nutrient Reduction strategy along with the state's other conservation cost share programs. Failure to adequately fund these programs will limit implementation of needed conservation programs. Jay Gunderson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #975.

Timestamp 1/17/2013 7:08 AM

Name Gary Twedt

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

These comments are in vocal support for the Iowa Nutrient Reduction Strategy recently developed and released by IDALS, ISU, and other important stakeholders. This strategy addresses the importance of cleaner water, while also recognizing that agricultural production is too varied and quite frankly too necessary to curtail severely by 'one size fits all' mandatory regulations that do not take into account the diverse nature of ag production practices.

Thousands of Iowa farmers like myself have already implemented conservation practices like contours, terraces, conservation tillage, buffer strips, and no-till farming. I personally have used all of these tools as well as implementing significant feedlot runoff controls on my farm. Farmers need to be recognized for what they have already done on the conservation front and encouraged to do more.

Please support this strategy by providing funding for the voluntary conservation practices necessary to adequately implement it. Let us show that we are serious about water quality without seriously hampering our ability to produce. Thank you for your time. Gary Twedt



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #976.

Timestamp 1/17/2013 7:20 AM

**Name** Michael Holst

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

has tremendously improved the water infiltration ability Michael Holst

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #977.

Timestamp 1/17/2013 7:23 AM

Name Jeff Gibson

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

Water quality, something everyone cares about whether they admit to it or not. Farmers have long done what they could to protect the great assest of clean water, most of the time without the help and funding from the government. The demands being placed on todays farmer increase on a daily basis and the help and backing those farmers receives continues to dwindle. It's time to fund a project that has science proven technology and results to help todays farmer continue to do what they have done for generations, keep the water in our rivers and streams as clean as possible. Help develop programs that work for Iowa and its situation and landscape. This can not be a one size fits all program. Stop the big blanketing regulations and develop programs that work and take into consideration the work that has already been done by farmers whose lives depend on the land and water.

Adequately funding the Iowa Nutrient Reduction Strategy as well as other state conservation programs should be the highest priority, to ensure our generation and those that follow the clean, clear water that we have always known. Jeff Gibson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #978.

Timestamp 1/17/2013 7:51 AM

**Name** Scott Hingtgen

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

As a livestock and grain farmer from Eastern Iowa I realize how important keeping clean water is to everyone beings so close to the Mississippi River, as well as several smaller tributaries. We need to support research done by IDALS, DNR and ISU. They have proposed a voluntary program that I feel will work with those of us in the farming community to keep our water clean and safe. The EPA's approach is to take over and make a one size fits all approach. I believe that we are doing a good job without them using their over reaching power to implement their policies. Scott Hingtgen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #979.

Timestamp 1/17/2013 8:14 AM

**Name** Stacy Maurer

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Agriculture contributes very significantly to the amount of pollution in our waterways. Agriculture is very profitable these days; those that are profiting should be required to implement strategies to mitigate or prevent their pollution.

Voluntary approaches don't work. They haven't for the last 40 years. We have worse water quality than ever. We can know who is polluting by locations of feedlots and CAFO's and tile drains. Those that are polluting should be required to clean up. There are documented strategies that work that farmers could follow but they are not required to do them.

Taxpayers should not shoulder the burden when most of the few farmers that are in business today have very large and very profitable operations, or else they wouldn't still be in business.

The state has laid out no timeline, no goals or monitoring. This is unacceptable if we are to make real progress to clean up our waters.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #980.

Timestamp 1/17/2013 8:15 AM

**Name** Rick Ryerse

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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5 years ago a Septic Plan was instituted for Jefferson County in Iowa. I supported this plan and I test my water which runs out of the septic field onto the land and eventually into the streams or ground water. CAFO manuer is "injected into the ground for crop land". The land to the north of my property and house has a stream which runs north to south thru conditute under the road. I am sure that this happens all over Iowa and eventually it enters streams and underground water systems.

No one in this State can explain why millions of gallons on manuer does not get absorbed into the soil and run off in the water and if their is a spill then major fish kills. I am sure other chemicals have the same effects. Yet my little effort of two people cleaing their waste water thru their Septic is regulated.

Its time for inforcement to have clean water in Iowa.

Rick Ryerse

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #981.

Timestamp 1/17/2013 8:45 AM

**Name** Kevin Jesse

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I commend Secretary Northey for his efforts on the Iowa Nutrient Reduction Strategy. I support this voluntary and science based path as opposed to the EPA's one size fits all. I urge you to fund the necessary measures needed to support broad implementation of this program.

Thank you for your consideration on this issue. Kevin Jesse

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #982.

Timestamp 1/17/2013 8:48 AM

**Name** Laura Foell

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

Having attending one of the Nutrient Strategy meetings that was held around the state which introduced the strategy, I am in favor of starting to implement it. The voluntary conservation practices need to be put into place if we are going to meet the goals set by the strategy.

Having used these practices for over 25 years on our operation, we understand how they can help the wind and soil erosion and the runoff situation. It is important however that these are voluntary-neighbors can see what these practices do and will be more likely to implement these if they do it voluntarily.

Funding should only be used to start up demonstration plots to encourage these practices. Laura Foell

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #983.

Timestamp 1/17/2013 8:51 AM

**Name** Jonathan Larson

**City** Grinnell

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I haven't studied the issue to be able to assess thoughtfully how the proposed strategy compares with other alternatives. I do wish to express my concern that the state and Iowa farmers be as cooperative as possible in efforts to restore health to the Gulf of Mexico. As consumers we suffer from the devastation of the marine ecosystem there. As Iowans we might be suffering from rivers and streams of less than ideal quality for recreation. As Americans we suffer because of the disruption to economic activity that is caused in the Gulf. And as humans we are failing in our responsibility to be stewards of the Earth. Given the current surplus in the Iowa state budget, I don't think this is a time for Iowans to worry about any negative impact on Iowa agriculture from steps taken to reduce run-off. In fact, looking seriously at this issue improves the sustainability of our own ecosystem and forces us to look more rigorously at how fertilizer etc is used, possibly saving money down the road.

I would feel more proud to be an Iowan to know that we are really doing what we can for this issue, and not looking to do simply something cheap.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #984.

Timestamp 1/17/2013 8:58 AM

**Name** Chris True

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

It is important to continue funding the Iowa Nutrient Redcution Strategy and other state conservation cost-share programs.

On my farm, I use terraces, waterways and new pond structures to lessen the effects of erosion on the environment.

Conservation practices are important to sustaining proper nurtrients in the soil which in turn will produce better crops and lessen the effects of the dead zone in the Gulf of Mexico. Chris True

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #985.

Timestamp 1/17/2013 9:08 AM

**Name** Cheryl Lundgren

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing to ask you to support and fund the Iowa nutrient reduction strategy. When such agencies as IDALS, ISU and DNR do the studies and support them that should speak volumes! We all know voluntary conservation practices work best, by funding state cost share programs it is a win, win situation for Iowa land and water! We have used the program on our farms and are working up the list again, state cost share gets the jobs done that wouldn't get done otherwise.

Thank you for listening to my concerns! Cheryl Lundgren

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #986.

Timestamp 1/17/2013 9:10 AM

Name Michael Jamison

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Water and soil conservation practices in the State of Iowa are in need of your help. As farmers, we realize that we need to protect our resources so that we can continue to meet the demands placed upon us to feed the world. As commodity and farm land prices continue to rise, every acre counts. Individually, we know how to protect each segment of ground we farm and we know we can get assistance thru the conservation offices in our areas to do them right, but here is where we need your help. We urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the State's other conservation cost-share programs. There are conservation projects out there needing this funding and waiting for assistance. Now is a critical time in agriculture to protect our soils, water, heritage, and livelihood. Without the conservation of these, what will we have left" Michael Jamison

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #987.

Timestamp 1/17/2013 9:13 AM

Name Stanley Mattes

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I contact you to voice my support of the Iowa Nutrient Reduction Strategy and encourage and ask for your support to fund this strategy.

The strategy is a SCIENCE and TECHNOLOGY BASED approach developed by the Iowa Department of Agriculture and Land Stewardship (IDALS), the Iowa Department of Natural Resources (DNR), and Iowa State University (ISU) to encourage the adoption of VOLUNTARY conservation practices that will have the greatest benefit for water quality in the state. It uses ISU research to determine which practices are most effective when applied to Iowa's unique landscapes. The strategy outlines these efforts in a scientific, reasonable and cost-effective manner, an approach supported by Farm Bureau members.

I stress that the strategy is science and technology based and that voluntary adoption is being recommended. I feel that voluntary involvement is more cost effective than mandated regulations. I feel voluntary efforts coupled with public funded incentives create more of a partnership environment to accomplish the goals of environmental protection.

As farmers, we realize the need to maintain agriculture production and value the importance of voluntary conservation measures. However, Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

Please support and fund the Iowa Nutrient Reduction Strategy. Stanley Mattes

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #988.

Timestamp 1/17/2013 9:18 AM

Name Neil Shaffer

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I encourage you to support increased state funding of soil and water conservation in Iowa. IDALS has done a good job of holding down cost through times of tight budgets, but in doing so it has reduced the number of watershed projects, state technicians, state secretaries and monies to implement the conservation programs here in Iowa. The only way we can leverage federal conservation dollars is through promotion and implementation. We cannot do this without adequate staff. There is a large back log of conservation practices farmers want to install but have so few staff at the state and county soil & water conservation district level it has slowed down implementation. Please support increased funding for IDALS, WIRB and IA DNR 319 watershed projects and the staff needed to implement them. Neil Shaffer

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #989.

Timestamp 1/17/2013 9:18 AM

**Name** Blake White

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I love farming and raising livestock, and I want to pass that love of agriculture production to my children. I know that is only possible if I seek out and implement responsible production practices. I also know that regulation is not the most effective or efficient way to get people to do something, but education is. If we fund the nutrient reduction strategy we will be educating people. This will, in the long run, have the most impact. Blake White

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #990.

Timestamp 1/17/2013 9:24 AM

**Name** Susan Knapp

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I urge to support and fund the necessary budget to implement voluntary conservation practices to reduce nutrient content in runoff water. Farmers will do practices to reduce runoff, but they will need help on some of the more expensive practices. This is a science based strategy, from our own Iowa State University and will work. Susan Knapp

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #991.

Timestamp 1/17/2013 9:34 AM

**Name** Virginia Rocha

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The state's proposed strategy falls short in many ways:

- It relies entirely on the same voluntary approaches for agriculture that have FAILED to clean up Iowa's water.
- It puts the bulk of the financial burden on taxpayers, even though FARM BUSINESSES ARE RESPONSIBLE FOR THE BULK OF THE PROBLEM.
- It fails to set any common sense standards to restrict a handful of the most polluting farming practices.
- The strategy outlines no timelines, interim goals or means of measuring annual progress toward reducing agricultural pollution.
- It includes no explanation of how the plans will be implemented, how problems will be prioritized or who will make these decisions.

Yes, the above comments were provided by the Environmental Working Group but they eloquently express my sentiments on this matter.

People. This water pollution cannot go on. You live here too.

Virginia Rocha



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #992.

Timestamp 1/17/2013 9:36 AM

**Name** Irene Lund

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support increased state funding of soil and water conservation in Iowa. Irene Lund

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #993.

Timestamp 1/17/2013 9:50 AM

**Name** Eric Fuhrmeister

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

Keeping Nutrients from washing off the land and into the waterways is very important from a cost stand point and clean water. The Iowa Department of Agriculture and Land Stewardship along with the Iowa Department of Natural Resources and Iowa State University have a plan. It is called the Iowa Nutrient Reduction Strategy. This plan will give farmer the flexibility to use different practices on their farms when needed. A multi use plan is far better than just one plan. Saving these nutrients means farmers spend less to replace them. It also helps keep the water cleaner. It helps lessen the Hypoxia problem in the Gulf of Mexico.

Today I am asking for your support of The Iowa Nutrient Reduction Strategy by voting to support it with funding.

Thank you for your help. Eric Fuhrmeister

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #994.

Timestamp 1/17/2013 9:53 AM

**Name** Craig Johnson  
**City** West Des Moines  
**State** Iowa

**Providing comment on the following sections:**

Executive Summary     Nonpoint Source  
 Policy                       Point Source

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My main point is that the communication process of whatever is adopted is key. Farmers

have to understand that doing nothing is NOT an option. This is voluntary right now, but with no action leading to now results, something else would follow that would not be voluntary.

I am a farmer. I believe this is the right approach. Something HAS to be done to protect water quality. We as a group are losing influence in Washington. The public is getting more removed from agriculture everyday. This is our shot at doing something that makes sense. The NON Optional approach may look a lot worse.

These points must be FORCEFULLY communicated to farmers!

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #995.

Timestamp 1/17/2013 9:54 AM

**Name** James Wess

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Farmers do a good job of using the correct nutrients to grow a crop. We don't need any mandates to protect the environment. Farmers do a good job of it voluntarily James Wess

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #996.

Timestamp 1/17/2013 10:01

**Name** Paul Hunter

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I'm writing to express my support for a voluntary, science based nutrient reduction strategy for the state of Iowa.

I know these strategies can work. I chair the Dry Run Watershed Improvement Association, a group of area farmers who have been working together to identify the issues that are affecting the watershed we live in, and implement practices to improve the quality of the water in Dry Run Creek.

There are many other groups like ours in the state. With proper funding we can continue our efforts to voluntarily improve the waters in our state. Paul Hunter

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #997.

Timestamp 1/17/2013 10:02

**Name** Mary Van Zante

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

No one cares more about the environment than farmers--their livelihood depends on it.

I urge you to adequately fund the Iowa Nutrient Reduction Strategy and other conservation cost-share programs. Adequate funding and farmer concerns will combine to make a voluntary program highly successful and provide a model for other states. Such programs will help eliminate mandates from the federal government--regulations we don't want or need and that are much less effective than state and local efforts to help agriculture move forward. Thank you! Mary Van Zante

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #998.

Timestamp 1/17/2013 10:06

Name joni spies

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

i wish to express my support for a nutrient reduction plan based on scientific strategies that take into account voluntary practices that will not jeopardize agriculture production levels.

We are currently enrolled in the CSP program and practice no-till methods. This has worked very well for maintenance of our soil and plan to continue these methods as well as adding cover crops in the fall.

Please remember to promptly fund conservation projects, as the funding is necessary for daily operation.

Thank you for your timely response to this request and please remember all that agriculture supports in this great nation -- America. joni spies

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #999.

Timestamp 1/17/2013 10:08

**Name** Joe Mather

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would like to notify you of my support for a science based state nutrient reduction strategy. This strategy should recongize the importance of voluntary conservation practices in balance with agricultural production practices. Please adequately fund the Iowa Nutrient Reduction Strategy, as well as other cost share programs. Joe Mather



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1000**.

**Timestamp** 1/17/2013 10:19

**Name** Eric Stall

**City**

**State**

**Providing comment on the following sections:**

<input checked="" type="checkbox"/> Executive Summary	<input type="checkbox"/> Nonpoint Source
<input checked="" type="checkbox"/> Policy	<input type="checkbox"/> Point Source

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Secretary of Agriculture Northey,

This is a straight forward thought out plan that we as a state can do, it's much better if we take this on than if the Feds do it , they the fed gov. Don't know all our efforts or our needs. We as farmers can do! Eric Stall

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1001**.

**Timestamp** 1/17/2013 10:22

**Name** Dean Whitehead

**City**

**State**

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

I am writing to encourage you to vote in favor of the Iowa Nutrient Reduction Strategy being proposed by ISU, IDALS and IFBF as they all deal and work to promote soil conservation and water quality. I am a farmer practicing soil conservation in all forms of good stewardship and feel it can be accomplished in earnest. Remember soil and water quality are our dollars invested now and in the future. I ask for your vote for voluntary not mandatory regulation. Thank you! Dean Whitehead, Panora, Iowa Dean Whitehead

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1002.

Timestamp 1/17/2013 10:30

**Name** Adam Drewelow

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would like to ask for your support for a science based state nutrient reduction plan. Farmers are stewards of the land and live off the land; therefore, we take care of it the best way we know how. We do not need a federal or state program with inadequate funding, as such with some of the current programs. Some practices we have done on our farm, include putting buffer strips in along the fields, and waterways in where needed. Adam Drewelow

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1003**.

**Timestamp** 1/17/2013 10:44

**Name** Roger Bumann

**City**

**State**

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

I'm completely in favor of science based state nutrient reduction strategy. Iowa farmers are well aware of good conservation practices. We know we have some of the best producing land in the Midwest and have to preserve it to produce enough food for the ever increasing world population.

I myself have miles of terraces, waterways, bufferstrips and headlands. Some of these practices I actually paid for out of my own pocket, I don't always believe in getting money from the government to put in some of these conservation practices.

So, I urge you to support the Iowa Nutrient Reduction Strategy and the other conservation programs. Failure to fund these programs in the past has delayed needed conservation projects. I'm also a commissioner on the local NRCS board and have seen some of the problems with funding.

Thank you for your time.

Roger A. Bumann

Ida Grove, Iowa Roger Bumann

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1004**.

**Timestamp** 1/17/2013 10:45

**Name** Vic Rathje

**City**

**State**

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

i'm sure there are good science based nutrient reduction studies & strategies to voluntarily reduce water pollution in the State of Iowa. WE need to adequately fund the Iowa Nutrient reduction Strategy so that we can do the Conservation measures necessary to curb water Pollution.

I have done Conservation Practices on our farmland in Clinton County (but live in Iowa County) with the NRCS & Iowa Dept of Agriculture cost sharing. There has not been enough State Funding in the past to do all the practices that needed to be done.

With pressure from the Federal Government to reduce Water Pollution, we need to act on this issue this year.

The voluntary approach with adequate funding & scientific researched projects, the State of Iowa can become a leader in Soil Conservation & reduction of Water pollution. Thank you. Vic Rathje

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1005.

Timestamp 1/17/2013 11:03

Name Chad Ingels

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

I am writing to support the implementation of the Iowa Nutrient Reduction Strategy. It is especially significant that the strategy has identified a voluntary approach as the best way to reduce impacts on water quality. As identified in the strategy, agriculture is an important non-point source of nitrogen and phosphorus losses. The science-based strategy identifies performance levels that can be expected with the different conservation practices.

I have worked with four farmer-led watershed groups that used performance measures to target watershed improvement. Each watershed was successful at attracting high levels of participation (50-75%) by using locally developed incentives based on performance.

These voluntary approaches are the best way to improve water quality but it takes state funding to create the initial incentives so that farmers will try out options. The Iowa Watershed Improvement Review Board is one important option, among others, that needs to be funded so that independent farmer-led watershed improvement associations have an avenue to create their own local incentives. Chad Ingels

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1006**.

**Timestamp** 1/17/2013 11:17

**Name** Peter Whitman

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Hi

I think that this is very important because land is what we farmers work with and on all day long and we pay more attention to what we put on the soil than people in town do. We worry about every part of the soil. People without an agriculture background don't care. A farmer is more likely to run a program that he knows will help him in the long run, then one first on to him. I think that if passed and helped you will see more farmers running these programs. I know I will !! Peter Whitman

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1007**.

**Timestamp** 1/17/2013 11:38

**Name** Larry A. Stone

**City** Elkader

**State** Iowa

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input checked="" type="checkbox"/>	<b>Point Source</b>

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Implementation strategy comment

The document glosses over several important things:

- 1) Most of the causes of the hypoxic zone come from unregulated agricultural sources  NOT from highly-regulated point sources.
- 2) The industrial, fossil fuel-dependent model of agriculture that we've encouraged farmers to use is destroying the natural capacity of our soil to act as a sponge to reduce runoff and retain nutrients. Alternative, perennial crops should be promoted as one long-term solution to the nutrient loss problem.
- 3) Decades of voluntary conservation efforts by some farmers have not addressed the problem. When commodity prices have risen, many farmers have chosen to put more land into production, resulting in more nutrient loads entering our rivers. Few farmers have elected to use their extra income to protect the land with better conservation practices.
- 4) There need to be runoff standards for agriculture and other nonpoint polluters to meet. But the way to meet those standards could be left up to individual landowners. It should not have to be a  one size fits all regulation  but regulations are needed.

Larry A. Stone

23312 295th St.

Elkader, IA 52043

lstone@alpinecom.net

January 17, 2013



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1008**.

**Timestamp** 1/17/2013 11:44

**Name** Robert Hays

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I want to urge you to adequately fund the Iowa Nutrient Reduction Strategy and the state's other conservation cost share programs. Proper funding in the past has delayed needed conservation projects. I also strongly support the science based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices. I feel that this is imperative to maintain agricultural production.

We have already implemented several practices that will help with conservation as well as our profitability. Among these practices that we have adopted are no till farming, reducing soil and nutrient erosion, the use of GPS, for the reduction of pesticide and fertilizer overlap, and split application of fertilizer in the effort to feed the plant what it needs closer to when it needs it. These program implementations will drastically reduce erosion, pesticide and fertilizer leaching into streams or water supplies. Robert Hays

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1009**.

**Timestamp** 1/17/2013 11:56

**Name** Charles Albrecht

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Voluntary Conservation works in my opinion. Our farm is notilled, we have grass strips, we farm on the contour and I don't believe we have any soil erosion leaving our farm. Yes, we have been compensated to accomplish these goals, but I would never take them out

I would ask you to please fund additional ways to preserve our land and keep our water clean. Please do not make mandatory regulations, as I believe farmers would then find a way around them and our goal would not be accomplished. We need to continue to keep agriculture growing in Iowa Charles Albrecht

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1010**.

**Timestamp** 1/17/2013 12:06

**Name** Peter Bardole

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

We as farmers do not need anymore regulations as we are trying hard to balance feeding an ever growing world in an evivomentaly sound way. I believe much of the time regulations get in the way of doing a better job maintaining the enviroment. We signed up for the CSP program and were penilized for splitting our fertilizer program to apply nutrients before both corn and soybeans instead of just before corn. To many times one size does not fit all.

We no-till our crops and only apply the nutrients need to grow one years crop any further regulations will only penilize our farm. We are always looking for better and more efficient ways to feed the world.

The funding of voluntary programs and farmer inovation I believe will get more done in a quicker time. Peter Bardole

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1011.

Timestamp 1/17/2013 12:11

**Name** Trudy Balcom

**City** Harpers Ferry

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I do not think there is enough funding or identification of specific actions needed to reduce non-point pollution in this policy document to create any meaningful change for Iowa rivers and streams and the Gulf of Mexico.

Yes, more watershed studies are needed, and ways to identify the amount and sources of nutrient loading in streams. But we already know that most of our waters are impaired. Why not fund incentives for stream buffers, or make them mandatory, or fine people who bulldoze borders. What about rewarding farmers who plant native prairie strips in their fields? ISU studies have shown this practice significantly reduces nutrients too, as well as increasing biodiversity. I don't see any carrots or sticks in this plan, just more of the same. We need to take action NOW! Our state and the Gulf have waited too long. This plan has the tracks of the Corn Growers Association and Monsanto, all over it, and smells like a 1,500 hog confinement manure pit.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1012.

Timestamp 1/17/2013 12:33

**Name** Linda Stoops

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

The Iowa Nutrient Reduction Strategy should be supported for the following reasons.

The strategy was developed by Iowa's own Dept. of Ag, Dept. of Natural Resources, and Iowa State University.

It was developed in Iowa to address the topographical diversity that exists within Iowa's borders. The strategy is based on scientific research that determines what has been an effective practice for each of the various Iowa landscapes.

The strategy is cost-effective and voluntary.

Agri-business in the state of Iowa supports this strategy for nutrient reduction.

Thanks for your support. Linda Stoops

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1013**.

**Timestamp** 1/17/2013 12:50

**Name** Chad Means

**City**

**State**

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

I like to say i support science-based voluntary conservation practices to controle nutrient reduction in our water ways. I thank you for you consideration on this matter. Chad Means

**Name** Michael Holst**City****State****Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

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Secretary of Agriculture Northey,

Let me try this again (operator error)

My desire to be more efficient and profitable along with building a more productive soil for future generations are what drive my voluntary conservation efforts.

I have virtually eliminated erosion utilizing a calcium-sulfate based soil amendment which improves both soil-bonding properties and water infiltration along with a rotary aeration vertical tillage tool that maintains soil structure while also improving water infiltration. The waterways we do maintain are there in the event of a heavy downpour. Where it is necessary, tile lines also help improve water infiltration and therefore reduce potential runoff. In the spring, I fertilize with a strip-till coulters system which allows me to be more efficient with my fertilizer use and also helps me build a healthier, more productive soil quicker.

I do these practices voluntarily because of market forces, because I'm trying to be the best farmer I can be and to provide a future for my family.

The reason this cost-share funding is critical is because some farmers farm ground that requires a much higher investment to put the various conservation practices in place. Without question, we have the knowledge to reduce nutrient runoff but to achieve this it will require education and investment. Michael Holst

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1015**.

**Timestamp** 1/17/2013 1:14 PM

**Name** Michael Sibbel

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy that is based on voluntary conservation practices. I have been no-til farming since the early 80's and I see how it has improved my land by keeping the soil in the field and not in the rivers and streams. While I have done this at my own cost, I can see the need for a well funded cost-share conservation program is needed for those who can't afford the up-dated equipment, or just need more enticement to implement conservation practices. Michael Sibbel



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1016**.

**Timestamp** 1/17/2013 1:20 PM

**Name** Cindy Bonnet

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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• History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

A mega dairy (Traditions Dairy, A.J. Bos owner) in Northwest IL polluted purple leachate into a stream leading into a state park. They applied 320,000 gallons on only 5 acres! The IL Pollution Control Board settled recently with Traditions agreeing to pay only \$1,000 of the over \$250,000 fines and abandoning the partially constructed project. (To read more go to [stopthemegadairy.org](http://stopthemegadairy.org).) Farmers like me were concerned that their groundwater would be contaminated by the millions of gallons of liquid waste generated by over 5,000 cows. Farmers cannot operate profitably if their water is contaminated. This self-regulated operation did not get an NPDES permit because they said they wouldn't discharge. Self-regulation doesn't work, especially in situations like this. Large industrial farms are a huge risk to clean air and water. It is time to keep a closer eye on them by the requiring information on where they are and how much waste they generate! Don't expect the public to have the resources and time to watch them!

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1017.

Timestamp 1/17/2013 1:31 PM

Name Larry Sailer

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would to share my thoughts on the IA Nutrient Reduction Strategy.

The plan that has been devised is a big increase in what we have done in the past. I think it is well thought out and will greatly increase the efforts of what has been done in the past.

The voluntary part, I think will multiply the plan by using farmer money and government funds together. It's a kind of skin in the game type of mentality. It should be the part that makes this effort the most successful.

On my own farm, the cost share projects have worked the best. The extra funds have enabled me to do projects that I couldn't do on my own. But yet with my own money involved, I want to make sure the project works.

I have read many letters to the editor. Most are critical of what has been done in the past, even saying that it has not worked. They mention how we have more endangered waters then ever before. I strongly disagree. I have been involved in farming for 60 years and have watched as the water has improved greatly. On my own farm, by using no-til, better technology and genetics, I see huge gains over the plow it black mentality we had before.

I see a lot more wild life than even just twenty years ago.

We must also remember the Dead Zone in the gulf is not a new problem. It was there before there were farmers in Iowa. If you think about the changes made by mankind to the rivers, the dikes and flood control, we have turned the Mississippi into a fire hose instead of the watering hose it used to be.

We do need funding to continue making the gains already accomplished to not be lost. New government money combined with voluntary money can do the job.

Thank you! Larry Sailer

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1018**.

**Timestamp** 1/17/2013 1:36 PM

**Name** John Schultz

**City** Urbandale

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Congratulations to the people who have drafted the Nutrient Reduction Strategy for Iowa. I think that anyone who reviews this document thoroughly must appreciate the effort of the people involved. It is based on science and not on pre-conceived ideas.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1019.

Timestamp 1/17/2013 1:48 PM

**Name** Gary D. Kruse

**City** Dubuque

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Policy

Nonpoint Source

Point Source

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It appears that agriculture is not being held as accountable as urban sources of pollution. While agriculture is estimated to account for 70% of the phosphorus and nitrogen, urban sources are much more highly regulated and agriculture is on a voluntary basis. Please hold agriculture as accountable as municipal and urban sources.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1020**.

**Timestamp** 1/17/2013 2:13 PM

**Name** Joseph Groszbach

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I farm in Clarke County Iowa,would like to comment on IOWA NUTRIENT REDUCTION STRATEGY. I support it, also would like to ask you to support and fund the effort when it comes up as legislation. The voluntary approach is better than A mandatory from the federal level.

Thank you Joseph Groszbach

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1021.

Timestamp 1/17/2013 2:13 PM

**Name** Jay Mathahs

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I urge the state lawmakers to sufficiently fund the Iowa Nutrient Reduction Strategy as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

Thank You for your consideration in this matter. Jay Mathahs

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1022.

Timestamp 1/17/2013 2:14 PM

**Name** Heidi Lack

**City**

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Adult bodies are about 57 percent H2O.

Baby bodies are about 75 percent H2O.

Adult bodies are about 2.6% nitrogen and 1% phosphorus. Too much is toxic/poisonous.

It is easier for us each to improve our water quality if there is a federal-state water quality law covering drinking water, recreational/outdoors-play water, industrial-use water, and waste water. The law needs to list specific analyte allowable measurement levels for the varied elements and chemicals (including nitrogen and phosphorus and their various combinations).

Eventually, non-drinking water sources may be our sources of backup drinking water, so trying gradually to improve water quality everywhere is needed.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1023**.

**Timestamp** 1/17/2013 2:33 PM

**Name** Scott Pierce

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I wanted to express my support for the Iowa Nutrient reduction strategy. The strategy is an approach that combines research, practicality, and is reasonable. Farmers understand the importance of nutrient loss because it hurts the environment, plus it reduces the nutrients in the soil available for plant uptake. By combining the various groups to help tackle this issue, some reasonable and effective changes can be made. The nutrient reduction strategy can be a benefit for farmers, agriculture, and the environment. Opponents who say that it will not help need to know that this is a science-based approach that could help farmers profitability by reducing nutrient loss. A strategy for reducing nutrient loss would be very well adopted due to helping farmers reduce fertilizer applied. Scott Pierce



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1024**.

**Timestamp** 1/17/2013 2:42 PM

**Name** Josh Lehs

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I strongly support a science-based nutrient reduction policy. Currently many farmers like myself are enrolled in programs to support conservation in farming. Please help to support the the Nutrient Reduction Strategy.

Without this support many conservation tasks would not be accomplished. Some examples are improved waterways, watershed programs, buffer strips, and fertilizer application methods.

In the past when funding was limited, most of these projects could not be accomplished without cost share funding. It is important to keep improving the land we have to the best of our ability. This is one way of helping that be a success.

Water quality is very important to everyone. Making a difference in conservation is one way of improving this. Josh Lehs

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1025**.

**Timestamp** 1/17/2013 2:50 PM

**Name** Esta Raasch

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I express support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I am urging state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

Voluntary conservation practices are already implemented and more will be implemented in the future to benefit farms and the surrounding environment.

Iowa agricultural people can do this!!! Esta Raasch

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1026.

Timestamp 1/17/2013 3:08 PM

Name Alex Durst

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

We need to support the science based Iowa Nutrient Reduction Strategy, as well as other conservation cost-share programs. These must be voluntary conservation practices, but we must maintain agricultural production. We as farmers know our land and what works out here in rural America. We are already using conservation practices for the betterment of our township, county, state, and country. We want to be as healthy as the next person, we are not going to do anything to risk our own health and welfare. Our wells are right here on our farms. We are the first ones to drink the water. What do think we are going to do" Science, real scientific unbiased facts and volunteerism for these programs are the way to impliment these programs. Give them funding and let the farmer take care of his land. He is the expert on it. Alex Durst

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1027**.

**Timestamp** 1/17/2013 3:09 PM

**Name** Stacy Boender

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I'm writing to ask for your support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I also ask that you adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

Our family strives to be good stewards of the land. We hope to one day pass our farm on to our children. Which is why we do the best we can with conservation practices. Stacy Boender

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1028**.

**Timestamp** 1/17/2013 3:18 PM

**Name** Daniel Winterhof

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am writing for your support to fund the Iowa Nutrient Reduction Strategy. I would VOLUNTEER to use ISU researched practices rather than "one size fits all" mandates that are expected to work the same across the entire state.

Thanks for your time. Daniel Winterhof

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1029**.

**Timestamp** 1/17/2013 3:20 PM

**Name** Melanie Guinn

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I would like to share my support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

Share voluntary conservation practices you've already implemented and those you hope to implement in the future to benefit your farm and the surrounding environment.

Our family currently has fenced the areas immediately adjacent to the creeks on our farm so that our cattle do not roam freely in the creek.

We cannot continue to implement regulations on our family farms. We need to be able to find a balance between regulations and sustainability of agriculture production.

As farmers, we are great stewards of this land and have been doing this without regulations for 5 generations.

I hope you will consider this information and support funding the Iowa Nutrient Reduction Strategy. Melanie Guinn

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1030**.

**Timestamp** 1/17/2013 3:22 PM

**Name** Kevin Prevo

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

It is in the best interest of Iowa farmer to keep the nutrient reduction strategy as voluntary. On our farm we are already complying with manure management plans and always do what is best for our ground and its longevity. I am the 5th generation to farm this land, so it is very important to my family. Kevin Prevo

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1031.

Timestamp 1/17/2013 3:32 PM

**Name** Alexander Gabis

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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To Whom It May Concern: Look, this state is nothing less than a disaster, ecologically speaking. It's becoming the Nauru of the Midwest -- a stripped, stark plain -- a dead-zone unsuitable for human habitation. Mile after mile of monoculture, commodity farming and the unlimited proliferation of putrid CAFOs prove beyond any doubt that the people of Iowa cannot be trusted to manage their own habitat. These "farmers," so-called, are poisoning and squandering the most precious resources this state has: its soil and its water. Someone had better step up to the plate here. I personally hate regulation; I hate the idea of a top-down, monolithic government telling communities how to behave, but unfortunately, Iowans have brought this on themselves. Specifically, the giant agribusiness interests have brought it on, along with the fools at the local level who so willingly partner with the likes of Tyson, Cargill, ADM and so forth. We are shooting ourselves in the foot. Hog farmers and corn growers are going to drive this state into an environmental oblivion from which it will not recover. We need to put some serious pressure on the agribusiness industry, for it is clearly they who are polluting our streams and rivers. Force must unfortunately be used; they don't respond to anything else. Voluntary compliance is a utopian vision, but the reality right now is that we need to hit these guys in the mouth. And for them their mouth is their pocket-book.

Al Gabis

Fairfield



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1032.

Timestamp 1/17/2013 3:47 PM

**Name** Don Paulson

**City** Letts

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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This plan is unacceptable. If voluntary practices and compliance worked a strategy wouldn't be needed. The concerns brought forward by the Environmental Protection Agency in their letter to Secretary Northey and Director Gipp as well as the concerns from the Iowa Chapter of the Sierra Club need to be answered implemented in any nutrient reduction plan.

Thank you for your time.

Don Paulson

Name Jon Freese

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support science-based state nutrient reduction strategy for a couple of reasons.

-I believe that most farmers try to improve all lands, not just the area they farm.

-It's to everyones advantage to have the crops use the nutrients and not let them into the water.

-This is one of the few times a situation has come up that the government may give the people a chance to fix it, as apposed to more regulations by the EPA, IDALS, DNR, NRCS, etc. No disrespect to my friends in those offices mentioned! I believe you folks have enough on your plates.

At risk of making this to long, I'll give one reason why the state lawmakers should fund the Iowa Nutrient Reduction Strategy:

Economics.

It's been my experience that most of the conservation practices that we've implemented on our farm have saved or made us money.

Some of the things we've (my Father and I) have implemented on our farm:

Cattle feed lots under roof. We now custom feed 600 head of cattle in two hoop style buildings. Zero water run off, unlike the old outside lots.

Applying our cattle manure in the ground as opposed to on top of the ground. We have added two manure pits (one on the down hill side of each barn). We now can use our liquid cattle manure in the same method as you would liquid hog manure. This is by far a more cost effective, time saving, and environmentally friendly way to use manure than the old manure spreader on top of the ground.

We have, in the last couple years, began to split shot our applications of nitrogen in our corn crops. Whether it be fall or spring applied manure, followed by a smaller rate of 28%; or making two applications of 28%. We have been using tissue samples of the corn to determine when and how much more nitrogen should be used for the second application. The key is to give the plant nutrients when it needs it. Don't put it all out there before you plant and hope there's some left for tassel time and kernel fill. Feed the plant nutrients when it needs it, you'll have better crops and less nutrients will end up wasted.

I think that the goals trying to be accomplished are very realistic and it should be fairly easy to get people involved. If for no other reasons than what I (one little farmer in the middle of Iowa) stated above.

Thank you! Jon Freese

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1034**.

**Timestamp** 1/17/2013 4:05 PM

**Name** Henrietta Borman-Grinter

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Whatever the solutions, it always comes down to financial support. Our Governor has a surplus of what, 20 Billion dollars. Couldn't some of this be allocated to make a dent in saving the Water of Iowa that pollutes all the way to the Gulf of Mexico. Ask the Governor for his input. Many thanks. HBG

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1035.

Timestamp 1/17/2013 4:19 PM

**Name** George Beardmore

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support voluntary conservation practices to improve water quality and believe they will work

if given adequate funding. I follow a nutrient management plan for the manure from our hogs

and have miles of terraces and am as concerned about water quality as anyone George Beardmore

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1036.

Timestamp 1/17/2013 4:24 PM

Name Gabrielle Roesch

City Ames

State Iowa

Providing comment on the following sections:

<input type="checkbox"/>	Executive Summary	<input checked="" type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

It is not enough to rely on farmers and limited conservation agency staff to ensure water quality improvements. The State or other institutions or organizations must fund both conservation practices and increased natural resource management staff to ensure adoption and compliance. This increased funding will support Iowa in realistically achieving meaningful non-point source pollution reduction despite current agricultural practices driven by high crop prices. Currently we have a voluntary system that has done little to reduce non-point source pollution into Iowa waterways, the Mississippi Watershed and the Gulf of Mexico.

I attended the December 19th public meeting in Ames and one of the strategy's contributors stated that a cultural shift is needed to successfully engage Iowans in adopting the needed water quality improvements and conservation practices. I agree that a cultural shift is indeed needed but I do not see how your strategy achieves this.

The strategy as currently outlined includes hypothetical adoption rates of conservation practices through voluntary compliance, yet the research team lacks adequate input from the field of social science--and farmers themselves--that would validate these scenarios. Use of current participatory conservation research would offer real-life examples of what the nutrient strategy plan lacks--a diversity of voices and perspectives--including farmers participating in field trials and voluntary conservation, non-profits developing extensive networks of public-private collaboration to address environmental concerns, and diverse stakeholders engaging in targeted projects creating watershed scale-improvements. Further, the strategy calls for additional agricultural conservation outreach and resources, but an awareness campaign is not enough to change the economic realities faced by farmers brought about by the high cost of corn. Finally, the strategy assumes that there is a way to do even more with currently limited financial resources allocated to support conservation and we have seen that this has not worked. The strategy needs to incorporate some voices of social scientists including sociologists, social psychologists and economists to give the strategy better tools for diffusing conservation practices across the landscape.

Our water quality will not improve for the benefit of all Iowans without the State of Iowa, farmers and Iowan institutions, taking responsibility for implementing meaningful and measurable conservation practices that actually improve water quality. Despite the messaging of some of the strategy's team members, Iowans do not all share an equal burden or responsibility for improving water quality. This must be facilitated by increased State funding to support cost-share programs and their administration, as well as a strategic outreach plan that uses the best social science research. The state may also have to look at providing some "stick" measures that punish farmers that continually ignore best management practices. Water quality is a public good that is managed by all of us in society but we do not all pollute it at the same rate. Those that do should have to pay more to improve the quality of that shared resource. That being said, since Iowan farmers are producing agricultural commodities, perhaps all of us need to pay to incentivize farmers to change practices.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1037**.

**Timestamp** 1/17/2013 4:31 PM

**Name** Matthew Emerson

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am writing to you in concern to the water quality concerns in Iowa. Many not related to agriculture, feel more regulations on farmers is the answer. Many of these people are not educated on what happens on farms. Farmers are not interested in losing their nutrients that they put on the ground to grow crops, and also they are not interested in losing the soil. With programs like the Nutrient Reduction Strategy in place, this helps farmers work with conservation efforts to enable them to enact conservation practices that are effective for their farm. Iowa is diverse in its landscape, not all of it can be treated the same. I urge you to support continued funding for the Iowa Nutrient Reduction Strategy.  
Matthew Emerson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1038**.

**Timestamp** 1/17/2013 4:36 PM

**Name** Joel Hoegh

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I believe that farmers want to reduce runoff from their farms. I am an earthmoving contractor along with being a farmer and I have never been as busy building terraces as I have in the last five years. I have been raising continuous corn on my lighter soils using no-till practices. The technology is available now to do so. We do not need more government control! We can do this without them to keep producing the cheapest and most abundant food supply in the world. Thank you for considering this. Joel Hoegh

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1039.

Timestamp 1/17/2013 4:56 PM

**Name** Richard Yoder

**City** Omaha

**State** Nebraska

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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My comments are general and emphasize the science used and strategies for impacting NPS pollution.

First, too much funding is going to earth science, not enough to the behavior, social, and decision sciences (BSDS). Major and significant resources need to be weaned away from earth and physical science and turned to BSDS.

Second, BSDS has more than one model of creating change among the populations which create NPS pollution. To effectively shift the culture to actually practice a prevention ethic, more models should be tried and evaluated until the right interventions are used in the right areas. Not all NPS polluters drive the same cars, go to the same churches, vote for the same party, raise their families in the same way. What rational person would expect all NPS polluters to respond to the same cues and incentives? The reasons NPS pollution occurs are as varied as the needed interventions.

Third, the measurement and goals of the strategy need to be more focused on absolute measures rather than relative measures. Simply doing better than has historically been done is not going to be doing enough to reduce risk to human health and the environment due to NPS pollution.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1040**.

**Timestamp** 1/17/2013 5:01 PM

**Name** Lynn Sackett

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Please be aware that I am in favor of funding the IA Nutrient Reduction Strategy. We need to be proactive, and voluntary, in our efforts to keep our waters and soils from becoming damaged or excessively saturated with fertilizers.

In our farming operations we have implemented many of the current conservation strategies including buffer strips, terracing, and GPS application of fertilizers. We need to be sure that we are using a science based approach to identifying sources of our soil and water contaminations and not just assuming it is only the agriculture activities that are contributing to the problem.

Thank you for your support. Lynn Sackett

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1041.

Timestamp 1/17/2013 5:11 PM

**Name** Ann Werner

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

The proposed voluntary nutrient reduction strategy is one of the most exciting conservation proposals to come along in years. It is science based, not another mandate based on theory. Iowa's food producers have been very diligent in improving the environment, and it is refreshing to have offered a science-based, voluntary program. As a grower of cattle and crops, I appreciate the relief from the threatening atmosphere of past programs.

Please insist that strategies are science based and also offer the necessary funding to implement these programs.

Thank you for all you do to encourage food production in our state. Ann Werner

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1042**.

**Timestamp** 1/17/2013 5:16 PM

**Name** John Fredrickson

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I am a farmer in Webster county. I would like you to support a science-based state nutrient reduction strategy. I know that it is important for all farmers to have a voluntary conservation practice, so that we can still maintain our crop production.

We need to have the full funding of the Iowa Nutrient Reduction Strategy along with the other state conservation programs. Without funding these projects there will be major delays.

I already have waterways and a terrace on our farm. Plus we do minimum tillage to save our soil and nutrients. These are all very expensive and needed to continue our ability to produce food for the world. John Fredrickson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1043**.

**Timestamp** 1/17/2013 5:18 PM

**Name** James Secor

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I support a science based nutrient reduction program and conservation practices that are voluntary.

These programs need to be adequately funded which has not happened in the past. I would hope with money in the budget that funding can be found this year. James Secor

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1044.

Timestamp 1/17/2013 5:20 PM

Name Guy Petersen

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

Secretary of Agriculture Northey,

I applaud Iowa Secretary of Agriculture Bill Northey, in cooperation with the DNR and ISU, for leading Iowa and mid-western agriculture in the right direction. This science based approach to reducing nutrient run-off is definitely the right direction to head for many reasons. Since Iowa and mid-western agriculture is so diverse, it would be impossible to implement a one size fits all approach that would be effective, let alone fair. Over the last 25 years, I have seeded many acres of grass waterways, headlands, and stream filter strips, and adopted no-till farming practices on almost all of my acres. I have reduced my nutrient applications via VRT fertilizer application and drastically cut my soil loss and nutrient runoff because of no-till. While it is in the best interest of EVERYONE to reduce nutrient runoff, I DO NOT believe that achieving that goal through costly and burdensome mandatory regulation is the correct approach. This problem did not develop overnight nor will it be solved by the stroke of a legislative pen. Somehow, we need to get the word out of the reductions that have already been achieved through voluntary efforts and continue to implement cost effective voluntary conservation practices that improve our water quality. Adequately funding the Nutrient Reduction Strategy as well as other conservation cost share programs would greatly improve our chances for success. Thank you for your consideration in this matter. Guy Petersen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1045.

Timestamp 1/17/2013 5:31 PM

Name Will Luers

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

Please support the Nutrient Reduction Strategy!

Our state needs a strategy with science-based conservation practices for farmers to voluntarily implement on their farms.

On our farm, we already utilize conservation practices such as no-tillage, zone-tillage, and reduced tillage practices. We also protect water quality through precise fertilizer application rates in crop zones, as well as multiple, precisely timed Nitrogen applications throughout the growing season that reduce Nitrogen loss.

Please adequately fund the Iowa Nutrient Reduction Strategy, and other cost-share programs relating to conservation. We farmers care about our land and environment because we rely on it to provide for our families for generations! Please team with us in making our operations even better! Will Luers

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1046.

Timestamp 1/17/2013 5:35 PM

Name Wayne Koehler

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing today to express my support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

My family has actively implemented voluntary conservation practices in our farming operation for many years. My parents were concerned about soil conservation in the 1970s and installed several terraces and grass waterways on our land. The addition of drainage tile has also reduced runoff and the soil erosion and nutrient loss that accompanies it. In later years I have adopted no-till farming practices that have made additional gains in soil and nutrient conservation. I have also conducted trials on my farms to study the impact of reducing the amount of fertilizers applied, and making applications at different times during the year instead of all at once before a crop is even planted. These trials have allowed me to make informed changes in the way I apply nutrients for crops. I use less nutrients per unit of production and by spacing out and using multiple applications I can reduce the amount of time that applied nutrients are susceptible to loss. I have also used GPS based grid soil sampling and variable rate application of fertilizers since 1997. We are now using actual harvest yield data captured during harvest to calculate actual nutrient removal and apply only what was removed.

Today's fertilizer expenses account for a significant percentage of today's crop production costs. Farmers do not want to spend any more than necessary to produce their crops. Farmers are voluntarily making adjustments to practices and inputs to control their cost of production. This voluntary approach is a win for profitability as well as a win for reducing impact to the environment.

In closing I would like to encourage you to support adequate funding of the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Wayne Koehler

**Name** Mary Fish**City** Fairfield**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

first of all, model used in Iowa's Nutrient Reduction Strategy has been used by big polluters to get out of cleaning up their acts. I don't see it supporting cleaner water in Iowa, and I don't like seeing it in this document.

The word funding is thrown around a lot in the document but it seems like funding is like not very thought out, considering the estimated costs. How does the cost breakdown compare to current use of the proposed funding sources. Where will it cut into those sources and take away funds from other programs? What programs will be minimized and how will this impact farmers and people in Iowa's towns and cities?

In addition to municipalities, industry contributes to aquatic pollution. Fertilizer plants, food processing and even food-based production of products like ethanol could be contributing a large percentage of the P and N, not to mention other toxics to Iowa's streams and rivers. Why aren't these addressed in the plan? Why aren't industries that take large amounts of water for their industrial processes, using as much as a smallish town, considered in this plan. Consumers are buying HE washers and low flush toilets to conserve precious water, while industry is going the other direction of using the most wasteful processes imaginable. Why is there no recognition of this or liability to big users for clean-up of contaminants from, or rectification of ejected waste water?

Likewise, most of the N and P leaching into Iowa's rivers from non-point sources comes from point sources - concentrated animal feeding operations - where animal waste is concentrated, collected, then sprayed or spread, untreated, on open, often barren fields. These fields are often tiled, and there is no or insufficient biofiltration to remediate the nutrient leached from the soil. Although it sounds good to say what nutrient runs off from Iowa's rich prairie soil is excess, its only excess because what binds it has been destroyed. What binds it is a deep root system rich in microbial life. When this is destroyed for the sake of a shallow rooted monocrop it has nothing to hold on to anymore. Its not excess, its lost. If it were excess, growers wouldn't be spraying anhydrous on their rich Iowa once-prairie soil. The other thing farmers like to do that sends nutrient downstream is punch out mature trees or wooded acreage to expand their tillable footprint. Trees are big mountains of nutrient. They are storehouses of it. If you want to reduce nutrient leaching increase the acreage of Iowa's native trees, especially between fields or pastures and waterways. Trees are also essential for purifying water and restoring springs and aquifers, moderating climate and lots of other things. Unfortunately, since spraying of glyphosate was ramped up many native trees have been stressed and doing poorly. We really cut our own throats with that one.

generally lacking in timeline or goals (especially for agricultural pollution) how long are we going to drag this out? If there is no mandatory compliance and producer X can trade water quality offsets with producer Y, aren't we just paying ourselves to shuffle papers here? How does the water quality actually get improved, can you envision the benchmarks, or a timeline? It seems that this document does little more than the one from 2008, and is equally pablum-atic in its will to make a difference. I cannot tell how the plan will be implemented, if there's any schedule for prioritizing projects - which there should be. Bigger polluters should clean up first, and should directly bear cost proportional to their profit margin. We should not end up with a scenario where corporations or their franchises (operating per their business model) who create the largest share of nutrient seepage, leakage, run-off, and the like, while reaping the largest profits, end up trading offsets and while continuing to send damaging pollutants into their community's waterways, or have it cleaned up at the expense of the community or are rewarded with funding from taxpayer-funded programs. I would like for the body that oversees distribution of funding and assessment of 'economy-of-scale' polluters' financial participation to be more effective than a proposal on a piece of paper. I would like them to inspire accountability, responsibility and best practices compliance with common sense solutions, favoring biomimicry over concrete and steel.

even though the report cites turbulence or erosion in rivers and streams as a cause of P pollution, inducing proper natural turbulence in waterways can help aerate and purify the water. Much of the problem in the gulf may be exacerbated by the Army Corps of Engineers locks and dams on the upper Mississippi river. I think tests should be conducted to see if re-introducing at least zones of natural turbulence in a locked and dammed waterway can reverse or compensate the nutrient overages. (Refer to the work of Victor Schauburger in Callum Coats title Living Energies)

I hope you got a kick out of this!



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1048**.

**Timestamp** 1/17/2013 6:11 PM

**Name** Matt Jackson

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Please help the farmers by supporting the Iowa nutrient Reduction Strategy . By giving it proper funding it will allow us as farmers to a good job with using good conservation practices. Matt Jackson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1049**.

**Timestamp** 1/17/2013 6:13 PM

**Name** Donald Kortenkamp

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am urging you to adequately fund the Iowa conservation practices. We need the environment for future farmers. In order to continue saving the environment, we need you to support the funding of the Iowa Nutrient Reduction Strategy.

As a farmer, we watch for run-off, use buffer strips, and leave prairie grass in areas. Please continue to use Science based data in determine nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.  
Donald Kortenkamp

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1050.

Timestamp 1/17/2013 6:28 PM

**Name** Drs. Ann and John Skopin

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The Iowa Nutrient Reduction Strategy is an insult to the intelligence of all Iowans! It relies on the same voluntary participation that has proven to be an abysmal failure in addressing the problem of massive pollution in the past. We taxpayers will bear the burden while farmers receive another handout courtesy of our pocketbooks. The plan lacks sensible minimum standards, timelines and measures of progress, and explanations of implementation procedures. Once again the quality of life of all taxpaying Iowans is mindlessly sacrificed for the sake of the profits of the already exceedingly profitable factory farms!!

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1051**.

**Timestamp** 1/17/2013 6:35 PM

**Name** Craig Corrin

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I strongly urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. Craig Corrin

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1052**.

**Timestamp** 1/17/2013 6:38 PM

**Name** Trevor Whipple

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Please support and fund the Iowa Nutrient Reduction Strategy. I am not excited about any more federal government mandates telling us how to farm and this is the only way I see to keep a voluntary strategy. I firmly believe that most farmers do all they can to protect the soil for the generations that follow in their foot steps. I would also like to see more common sense used when doing state funded conservation work. I have done several of these projects and if more common sense and less crap out of a book was used most of these projects could be done cheaper and farm better when finished. Trevor Whipple

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1053**.

**Timestamp** 1/17/2013 6:55 PM

**Name** Marianne McGregor, M.D.

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1054**.

**Timestamp** 1/17/2013 7:03 PM

**Name** Jeffrey Mordhorst

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I urge you to support the Nutrient Reduction Strategy program. My opinion is to regulate fertilizer like livestock producers are regulated. The only way it would be successful is to hold fertilizer retailer responsible for over application. Jeffrey Mordhorst

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1055**.

**Timestamp** 1/17/2013 7:06 PM

**Name** Mark Wilcox

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I think it is self-evident that Iowa farmers would be in support of this action and we're sure you are also. Not only is this a science-based initiative, but it is also voluntary. There is no need to go to mandatory measures right out of the chute. I think Iowa agricultural people are astute enough to realize that this method of dealing with pollution problems is far preferable to onerous, sometimes draconian mandatory measures that would surely come down the road. This makes sense and deserves your support.

Thanks for your time,

Mark Wilcox

Cherokee County Mark Wilcox



**Name** Ben Hollingshead**City****State****Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

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Secretary of Agriculture Northey,

I was encouraged to hear that Iowa is taking the initiative of a proactive approach to nutrient reduction. I believe that keeping ahead of the curve on issues like this keeps us at the forefront of the United States agricultural system. It is increasingly vital that we continue to be a leader of the pack and not falter or waiver on this issue. I only hope that the lessons of the Dust Bowl days are never forgotten and that people like my grandmother's stories still remind us and teach us that good conservation practices are paramount to ensuring our heritage for generations to come.

We must properly fund voluntary conservation programs. I believe that there are some very good programs that have been proposed and farmers are willing to do them but we must provide the funds for the catalyst to get the ball rolling. Things like cover crops are only beginning again to be realized in their importance and proper funding that program is a great way to kick start the use of cover crops on a commercial scale. We are only beginning to realize and understand the importance microbiological activity plays in the soils. These conservation practices in real world situations are helping us better understand them. My hope is that eventually farmers will see that these pilot conservation tools have merit in large scale commercial agriculture. Now, let me be very clear. No project will ever be a one size fits all program. This state has a very diverse landscape. Look at the differences in our 12 different major soil types in this state, all with different properties and characteristics. We have areas like our central Iowa Des Moines lobe soils comprised of Clarion Nicolet Webster that are almost completely flat with potholes and low lying areas and no more than we get east of State Center we get into the rolling rich soils of Tama-Muscatine-Downs to western Iowa and the Loess Hills of light silt steep slope soils. Each area each soil each farm has its own story to tell of what practice will work best to preserve it.

So please do not get buried by a bunch of political poppycock. This is important and it affects more than just a farmer wanting to put in a waterway. It involves every single one of us. Ben Hollingshead

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1057**.

**Timestamp** 1/17/2013 7:10 PM

**Name** Mike Kleitsch

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Hello. I understand that you are talking about Iowa's Nutrient Reduction Strategy. I would be in favor of it being science based and hopefully funded along with conservation cost share programs. I already have waterways, probably wider than needed but I make hay off them and it still slows the water runoff. I also use a rotation of corn, oats and hay on my farm ground which in turn limits my erosion if there is any. Thank you for time. Mike Kleitsch

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1058**.

**Timestamp** 1/17/2013 7:19 PM

**Name** Mark Loutsch

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I ask you to fund the Nutrient Reduction Strategy and Iowa's cost-share programs. I farm about 1000 acres with my two brothers and all of it is terraced to keep water from running off. Some are the ones my grandfather built in 1949 that we keep maintained. It is important to be science based. Farmers are willing to do proven practices from local areas. Mark Loutsch

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1059**.

**Timestamp** 1/17/2013 7:29 PM

**Name** Randy Wuebker

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

The need for farmers to be good stewards is higher than ever. Many farmers already do what they can when it comes to conservation practices, but the cost is so high. With adequate cost-share funding, much more could and would be done. Please fully fund all conservation programs.

Thank you for your time and consideration on this matter. Randy Wuebker

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1060**.

**Timestamp** 1/17/2013 7:32 PM

**Name** Bryan Kruse

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I strongly support a voluntary science based nutrient reduction strategy. The state must take responsibility and adequately fund it as needed. Voluntary conservation projects in the past have had great impact when properly funded.

On our farm we have built terraces and seeded filter strips along creeks to reduce runoff. We use variable rate fertilizer application to reduce the amount of nitrogen and other fertilizers we use on our land. This year we will use variable rate planting to optimize the fertilizer we have applied. We have done all of this voluntarily. Bryan Kruse

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1061.

Timestamp 1/17/2013 7:32 PM

**Name** Katherine Mittman

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Farmers are already choosing to work to make conservation practices a part of their farming plan.

From deciding to work with the CRP programs around the state to adding a cover crop to fields during the winter are conservation practices that farmers are already implementing.

We as farmers need you to support so that we can continue to grow crops to feed the Nation/World but also will help preserve the land for future generations. Katherine Mittman

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1062**.

**Timestamp** 1/17/2013 7:36 PM

**Name** Brett Sweeting

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I support science-based nutrient reduction, with 3rd party oversight. It seems like we jump the gun on policy and don't quite understand the impacts before we sign the bills.

If we fully fund the studies we would be able to get a better understanding on how Iowa really effects the other states instead of what they say we do.

If we could see how it would benefit us in the future, we would do it. Right now it seems like there is not much justifiable science to make the changes. I would not need a gov't agency to make the change.

Thank you for your time. Brett Sweeting

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1063**.

**Timestamp** 1/17/2013 7:40 PM

**Name** Richard and Lucinda Hall

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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We really need to protect our waters that nourish all of life. Please put in place stronger policies than are proposed, with mandatory checks on progress. Do it quickly and make it a high priority.

Thank You,

The Halls



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1064.

Timestamp 1/17/2013 7:42 PM

**Name** Nick Hermanson

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing in support of Iowa's Nutrient Reduction Strategy. I hope that you will consider adequately funding this program. Iowa's farmers, much like myself are already taking precautionary steps to improve our environmental impact and image.

On my farm, my family has implemented a strip till conservation tillage system farm wide, that till only 1/3 of the ground, leaving existing plant residue for erosion control. We have also planted buffer strips along all of our streams that border fields. We are currently in the process of building retention ponds to drain our tile lines into, that will provide irrigation water at a later date. With additional scientific research and conservation funding, we can all make progress in these areas. I believe a dollar spent on conservation efforts will far outweigh those spent on increased regulations. Nick Hermanson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1065.

Timestamp 1/17/2013 7:43 PM

**Name** Ronald Retleff

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I support a science based nutrient reduction strategy. I feel it is important that the implementation of conservation practices be voluntary. I know the land I farm best. I also understand that what I do on my farm has implications that exceed the boundaries of my land. Living and farming next to a river quickly makes you aware of the effects of a heavy rain, or fast melting snow pack, or just plain old high water. I have come to realize that if I want to pass my farm on to future generations I needed to implement some conservation practices. So I enrolled my most vulnerable ground into CP-33. Since establishment of my CRP I have already noticed a reduction in erosion. I also changed my tillage practices to reduce erosion from the wind and from the rain.

I urge you to adequately fund the Nutrient Reduction Strategy, as well as other cost sharing conservation programs Ronald Retleff

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1066**.

**Timestamp** 1/17/2013 7:49 PM

**Name** Darren Luers

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Thank you for the support on this issue. Conservation is something our family practices everyday. With funding of programs and voluntary practices. Farmers all over the state will be able to continue and maintain agricultural production at its best. Darren Luers

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1067**.

**Timestamp** 1/17/2013 7:50 PM

**Name** Shane DeBord

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

As an Iowa farmer, I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. Shane DeBord

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1068**.

**Timestamp** 1/17/2013 7:55 PM

**Name** Richard Warren

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

We put in terraces and use grass waterways. We limit the amount of chemicals and fertilizer we use. We work to control run off. Because there is more work to do, it is imperative that we keep the funding for conservation practices.

Thank you for your consideration of this issue! Richard Warren

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1069.

Timestamp 1/17/2013 7:59 PM

**Name** Frank Wintroub

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The policy that is being considered is not strong enough on most levels to significantly improve the protection of Iowas water.

Leaving to much of the responsibility for clean up or proper behavior to protect the water is left to voluntary efforts.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1070**.

**Timestamp** 1/17/2013 8:03 PM

**Name** Nate Kemperman

**City** Ames

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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This is an addition to my first comments, sent on the 15th of January.

I just wanted to make clear that in the last of my points, I wrote "2nd section", meaning actually Section 1. My basic feelings are still the same though - please make the language clearer as the writing style made it hard for me to follow. And please be consistent throughout the document. For example, what exactly is the role of application reduction in the non-point source strategy and what is the basis of that position?

Thank you again for making this strategy happen,

Nate Kemperman

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1071.

Timestamp 1/17/2013 8:07 PM

**Name** John L. Hanson

**City** Marion

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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The Iowa Nutrient Reduction Strategy is too weak on nonpoint source pollution. After 40 years of non-compliance with the Clean Water Act, Iowa must take more concrete steps to clean our waters. Our reliance on continued voluntary efforts is mistaken and doomed. Also, our Nutrient Strategy is at odds with state supported efforts to increase the availability of synthetic fertilizer by subsidizing two large factories. All pollution contributors must be held accountable, only then can we expect an improvement.

-jh



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1072.

Timestamp 1/17/2013 8:31 PM

**Name** Elizabeth Quarles

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

- History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.
- The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.
- Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.
- The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.
- The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1073**.

**Timestamp** 1/17/2013 8:34 PM

**Name** Adam Hill

**City**

**State**

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

I urge you to adequately fund the Iowa Nutrient Reduction Strategy. Iowa's failure to fully fund these programs in the past has delayed needed conservation projects. I no-till most of the land I farm and have also built terraces and put in tile. Please fully fund the Iowa Nutrient Reduction Strategy. Adam Hill

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1074**.

**Timestamp** 1/17/2013 8:36 PM

**Name** Tim Diamond

**City**

**State**

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

I know we have discussed this topic when we met at Johnny Ray's a month ago, but it's very important that we get an Iowa nutrient reduction strategy in place. I feel if we don't do something on the state level we will be going down the wrong road. The people on the federal level don't understand what it takes to grow a crop and they think we are just out here wasting chemicals and fertilizer. Most of us are utilizing everything we put on our land, have bufferstrips and waterways where needed, and use minimal or no till practices. I hope you will strongly consider adequately funding the nutrient strategy reduction. Tim Diamond

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1075.

Timestamp 1/17/2013 8:46 PM

**Name** Linda Jensen

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. I would urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.  
Linda Jensen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1076**.

**Timestamp** 1/17/2013 8:46 PM

**Name** Bill Beers

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I would like to take this opportunity to express my support for a science-based state nutrient reduction strategy. I would hope that this plan would recognize the importance of voluntary conservation practices and the need to maintain agricultural production.

Please adequately fund the Iowa Nutrient Reduction Strategy as well as the states other conservation cost-share programs. In the past, failure to fund these programs has delayed implementation of these vary conservation practices.

On our farm we have already implemented water control practices that slow water as it leaves our land so that soil and nutrients have a chance to settle. In the future we would like to expand these practices to protect our environment further. Bill Beers

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1077**.

**Timestamp** 1/17/2013 8:57 PM

**Name** Ryan Gaffney

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Overall I think it is a good idea. It would be more beneficial to catch the nutrient load discharge before it ends up in our rivers and streams instead of reducing the rates of chemical being applied to farm fields. Ryan Gaffney

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1078**.

**Timestamp** 1/17/2013 9:05 PM

**Name** Bret Hays

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I strongly encourage you to support the nutrient reduction strategy as well as continued funding for the state's other conservation cost share programs. Despite popular belief farmers care about the environment. If we fail to take care of our land, it will not continue to be productive for future generations. As a father of three, and fourth generation farmer, nothing would make me happier than to pass the operation onto a fifth generation and further. That to me is the goal of every farmer. Bret Hays

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1079**.

**Timestamp** 1/17/2013 9:17 PM

**Name** Corey Malichky

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

My name is Corey and I have a wife and two young children I am involved in a small family farm operation and also custom feed hogs. All the farmers that I know do more for the environment than all the loud whiny environmentalist put together. Please stick to the facts and use only valid science, like what was used to construct Nutrient Reduction Strategy. Please support this plan and fund it along with the other conservation programs, our soil is the most valuable thing Iowa has. Corey Malichky



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1080**.

**Timestamp** 1/17/2013 9:17 PM

**Name** David Scott

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I would like to ask you to support and fund the Iowa Nutrient Reduction Strategy. This is a plan created with real science and in our home state not Washington DC. The EPA is going to force us to do something so lets be pro active and use a plan that is reasonable.

We are 100% no-till, Have miles of terraces and grassed waterways on our land, we seed cover crops on highly erodeable ground in late August each year. We are striving to do our part already and don't feel that we need the EPA beating us up.

Thankyou David Scott

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1081**.

**Timestamp** 1/17/2013 9:23 PM

**Name** Matthew Fitzpatrick

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I support a state nutrient reduction strategy that would be implemented through voluntary conservation practices. I want to encourage you to support the Iowa Nutrient Reduction Strategy by adequately funding this and other cost-share conservation programs. I believe this strategy would be great for sustaining the future of Iowa agriculture. Thank you for your time. Matthew Fitzpatrick

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1082**.

**Timestamp** 1/17/2013 9:31 PM

**Name** Rick Weymiller

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I actually applaude the efforts of the state of Iowa for the pursuance of a nutrient reduction plan that actually uses Science. It is not a knee jerk reaction that caused the great Cheasapeake Bay fiasco.

I am a firm beleiver that the carrot works bstter than a stick .

With the help of the NRCS we have improved our feedlots with retention walls and drain fields. I have also planted a nutrient retention strip along the river nest to outr house. Rick Weymiller

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1083**.

**Timestamp** 1/17/2013 9:33 PM

**Name** Randy Greufe

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am curenly a strip tiller this leaves a lot of residue on top with only disturbing a small portion to keep the soil from blowing. We need to take a science base approach to this so we get it done right. This will happen with the science based approach!! Randy Greufe

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1084.

Timestamp 1/17/2013 9:36 PM

**Name** Clayton Reints

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing in support of adequate funding for a nutrient reduction strategy. Voluntary conservation practices are a critical part of maintaining agricultural production in Iowa and insufficient funds hinder agriculture in Iowa. Iowa farmers are open to participating in conservation practices that are beneficial to their land and their operations. Iowa farmers are leaders in conservation. As a member of multi-generation farm, I have witness the impact of conservation efforts. We participate in conservational practices because they benefit our farming operation. We are able to conserve our soil and create a quality of life throughout the water and wildlife. We are eager to contiue in conservation efforts but additional funding will help aid in the preservation of Iowa farm land and life. Clayton Reints

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1085.

Timestamp 1/17/2013 9:36 PM

Name Richard Roorda

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing today to lend my support to the Iowa Nutrient Reduction Strategy and to encourage you to both support and fund same.

This program was developed by a broad range of stakeholders including IDALS, DNR and ISU and is a science-based program of voluntary conservation practices that will have a great benefit on water quality in this state. I am in disagreement with those who claim the INRS will not work and more regulations are needed. My opinion is that there are practices that would work here in Jasper county that wouldn't be applicable in other areas of the state due to differences in things like soils and topography.

I realize that there will likely be a problem with funding (state cost-share) but the demand for assistance in the past outstripping the supply of funds has kept many projects from completion.

On my own farm I have been gradually reshaping and grading waterways, installing tile drainage, seeding some buffer strips along minor creeks and this fall I seeded 20 acres of cereal rye on the corn acres I harvested as silage. I would like to continue these projects and more in the future.

Again, please support and fund the Iowa Nutrient Reduction Strategy. Richard Roorda

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1086**.

**Timestamp** 1/17/2013 9:37 PM

**Name** Joseph Rotta

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Bill Northey had the vision to put Iowa in a great position to conserve some of the best soils in the world. Terraces waterways filterstrips and no-till are some of the practices that I have implemented in the past. Cover crops are an idea that was researched in the NRS that look like they might be advantageous to me in the future. I urge you to fund the Nutrient Reduction Strategy. Thanks for listening. Joseph Rotta

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1087.

Timestamp 1/17/2013 9:43 PM

Name "Jack" John S Engstrom

City Fairfield

State Iowa

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

I commend that-part-of the-state's-proposed-strategy that recommends strict new rules for cities and industry,

BUT I am unimpressed and very disappointed with the measures it proposes to address AGRICULTURE's contributions to the excessive nutrients in our water.

- The strategy relies entirely on the same voluntary approaches for agriculture that have failed to clean up Iowa's water. Relying on voluntary measures is not effective enough. Decades of relying on this voluntary approach has done little to fix the problem
- The strategy fails to set any common sense standards to restrict a handful of the most polluting farming practices.
- The strategy puts the bulk of the financial burden on taxpayers, even though profitable farm businesses are responsible for the bulk of the problem.
- The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.
- Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses CAN implement immediately, the state plan recommends NO MINIMUM of care that farmers SHOULD follow.
- The strategy fails to specify how pollution-control-plans will be implemented, how problems will be prioritized or who will make these decisions.

I submit that "more teeth" needs to be put into AGRICULTURE's reduction of nutrient-discharge in order to have a real (rather than merely purported) strategy that could-actually-achieve the stated goals, and would eliminate Iowa's share of Gulf-of-Mexico's apoxia.

Yours,

"Jack" John S. Engstrom, Vice President of the Iowa Sierra Club's Leopold-Group.  
engstrom@lisco.com, 641/ 469-5243  
mail: P.O. Box 1704, Fairfield, Iowa 52556-0029  
411 E. Hempstead Ave basement, Fairfield 52556-2954



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1088**.

**Timestamp** 1/17/2013 9:50 PM

**Name** Robert Vanwyk

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

Decisions on best practices on any given parcel of land are best made by the farmer who literally has his boots on the ground ;not a lawmaker and not a faceless bureaucrat. Please let us make our own science backed decisions on conservation practices..It would definately help it theIowa Nutrient Reduction Strategy as well as other voluntary conservation policies are fully funded. Thank you.  
Robert Vanwyk

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1089**.

**Timestamp** 1/17/2013 9:55 PM

**Name** Andy Jackson

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I would like to take a minute to urge you to support a science based nutrient reduction strategy.

While I support a clean responsible environment, we must also maintain Iowa's productivity and thriving ag industry. Runoff from urban lawns and golf courses should also be included. Andy Jackson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1090.

Timestamp 1/17/2013 9:59 PM

Name Beth Butcher

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Today I am writing to you to ask for your assistance in supporting the Iowa Nutrient Reduction Strategy. I feel this will help tremendously with the water quality and other conservation practices. Much research has been done on these practices. I believe this would be the most cost effective and useful method for the farmers here in Iowa. We don't need more regulations forced on us. We want what is best for our farms and our environment; we want to help with the solution also.

As farmers, we have implemented conservation measures by building terraces and adding water ways to help reduce soil erosion. We are working at helping maintain our environment.

Again, I am asking you to help fund this strategy. Thanks for your help. Beth Butcher

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1091**.

**Timestamp** 1/17/2013 10:02

**Name** James Holz

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I am a young farmer in the changing times of Agriculture. I believe water conservation / quality is one of the most important issues in the future of Agriculture in the United States. Because of its importance, I have used cover crops and filter strips that combat soil erosion, improve water quality, and soil health. That is why the adoption and adequate funding of the Iowa Nutrient Reduction Strategy is imperative to Iowa's agriculture success. However, this strategy should be science based by researchers that understand Iowa's landscape and farmer practices (ie Iowa State University) Many critics of this program say this should be regulated instead of a voluntary program. I disagree with these critics; voluntary programs are the best option. Farmers and government working together will find the most practical and beneficial practices.

James Holz James Holz

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1092**.

**Timestamp** 1/17/2013 10:04

**Name** Mark Schuelke

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I urge you to support the Iowa Nutrient Reduction Strategy movement. New ideas can only become common practice in a short period of time by spreading the WORD. That is what these conservation programs do! Mark Schuelke

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1093**.

**Timestamp** 1/17/2013 10:10

**Name** John Hanson

**City**

**State**

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

As a farmer and member of the Ag Business community I wish to express my support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I would like to urge my state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Past history in Iowa has shown that failure to adequately fund these programs has delayed needed conservation projects.

Our farm is 100% no-till and we have used cost share money various times to stop erosion and improve water quality on our farms. John Hanson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1094**.

**Timestamp** 1/17/2013 10:14

**Name** Ross Kooiker

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Please support the Iowa Nutrient Reduction Strategy.

No one knows the fields of Iowa better than the farmers that are cropping them.

Technology is constantly improving and making soil conservation efforts easier to do while helping to improve yields.

In the past few years we have reduced our tillage greatly. We now use no tillage for any bean acres and have started to do some no till corn. The no till corn shows promise but we are being cautious as there is lots of money on the line on every acre.

Adopting one size fits all regulations would be very costly for Iowa's farmers both in equipment and yield losses. Ross Kooiker

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1095**.

**Timestamp** 1/17/2013 10:26

**Name** Brady Hanson

**City** Castana

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Please set policy based science and use that criteria when making decisions on coonservation pratices



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1096**.

**Timestamp** 1/17/2013 10:31

**Name** Keith Henry

**City**

**State**

**Providing comment on the following sections:**

<input checked="" type="checkbox"/> <b>Executive Summary</b>	<input type="checkbox"/> <b>Nonpoint Source</b>
<input checked="" type="checkbox"/> <b>Policy</b>	<input type="checkbox"/> <b>Point Source</b>

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Secretary of Agriculture Northey,

I would appreciate your attention on the matter of nutrient reduction strategy. Many operations are approaching this in a variety of ways because each situation is unique and needs to be handled in different ways. Many of the solutions can be very costly to implement so the need for state funding or cost sharing programs is needed to accomplish these goals. There is some simple technics like a practice that I am utilizing this fall and winter season, such as seeding several acres to winter wheat to achieve a ground cover crop to protect from wind and water erosion and to build some organic matter in the soil profile.

Thank You for your time. Keith Henry

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1097**.

**Timestamp** 1/17/2013 10:33

**Name** Michael Mcenany

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Nutrient management is important for the state of Iowa, however we can't take a one size fits all approach because of how the soil types vary across the state. A one sized fits all solution is not the answer. Therefore, we need funding for conservation cost share programs as well as funding for nutrient reduction strategies. This will allow us, Iowas farmers to better maximize yield without being wasteful when it comes to nutrient usage. Michael Mcenany

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1098**.

**Timestamp** 1/17/2013 10:36

**Name** David Skubal

**City**

**State**

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

We already use riparian buffers, terrace, grass waterways and no-till with great success. These kinds of issues are handled better on a state level rather than the EPA level.

ISU can deliver the technical support for helping to reduce runoff, let's use them! David Skubal

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1099**.

**Timestamp** 1/17/2013 10:40

**Name** Klark Telleen

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I am writing to express my support for the science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I encourage you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

I currently use conservation practices, such as contour stripping and crop rotation with forages, on my farm operation. I hope to continue to implement these conservation practices in the future to benefit my farm and the surrounding environment.

Your support of the Iowa Nutrient Reduction Strategy would benefit all Iowa residents and encourage Iowa farmers to use more conservation practices. Klark Telleen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1100**.

**Timestamp** 1/17/2013 10:44

**Name** David Wohlford

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am writing in support of the Iowa Nutrient Reduction Strategy. This plan was drawn up by and based on research from Iowa State University, IDALS and the DNR. These institutions understand Iowa agriculture, soils and weather. They also work to help farmers reduce soil loss and prevent nutrient loss.

There are many ways to reduce nutrient loss. In our operation we have many acres of grass waterways to slow runoff and filter the water. We also use buffer strips along some streams to slow bank erosion. But, the efforts we make in our operation may not be right for other farmers. Therefore, the programs need to be voluntary to give farmers the flexibility to make them fit their operation.

Many practices to control nutrient loss can be costly to implement. Therefore, funding for programs to address nutrient loss is needed. In the past inadequate funding has delayed needed conservation practices.

I support and ask you to support the science-based nutrient management plan for the state of Iowa. It also needs to be voluntary and properly funded. David Wohlford

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1101**.

**Timestamp** 1/17/2013 10:44

**Name** Todd Thomas

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Science-based state nutrient reduction strategies need to recognize the importance of voluntary conservation cost share programs. The failure to fund these programs in the past has delayed needed conservation projects. These programs need to be funded fully to support Iowa's clean waters and to help keep the environment clean. Todd Thomas

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1102**.

**Timestamp** 1/17/2013 10:50

**Name** David Klindt

**City**

**State**

**Providing comment on the following sections:**

<input checked="" type="checkbox"/> <b>Executive Summary</b>	<input type="checkbox"/> <b>Nonpoint Source</b>
<input checked="" type="checkbox"/> <b>Policy</b>	<input type="checkbox"/> <b>Point Source</b>

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Secretary of Agriculture Northey,

Hello, my name is David Klindt and I farm with my family in Bettendorf raising corn, beans, alfalfa hay and cattle. I am writing today because I feel it is very important to fund the states conservation cost-share programs along with a nutrient reduction strategy. Having two young kids at home it is very important to protect our soil and water for future generations. We practice many conservation practices already such as crop rotation, maintaining waterways that the grass can be harvested for cattle feed and no-till. Agriculture production is one of the most important things in Iowa and I feel this would be money very well spent. Thanks for your time David Klindt

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1103**.

**Timestamp** 1/17/2013 10:52

**Name** Timothy Keegan

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I think it is well known there is need to evaluate and set up processes to mitigate nutrient loss through run off. That is why the task force was set up with the Iowa Department of Agriculture and Land Stewardship, the Iowa Department of Natural Resources, and the Iowa State University College of Agriculture and Life Sciences. Keep in mind, these are the experts in this issue and have experience on several different levels. What they have come up with is a science based voluntary process. As a young farmer that is actively involved in managing 3rd generation farm ground as well as actively renting new, I am very interested in reducing the nutrient loss. Not only does it not make sense from an environmental standpoint, it makes sense economically. That is why I am convinced a voluntary nutrient reduction model will work. The cost of fertilizer does not allow for any loss. We cannot afford to be doing practices that are not conserving our nutrients because the replacement cost makes us uncompetitive in the long term. On our operation, we already are using variable rate nitrogen application with different types of nitrogen as well as gride soil testing on phosphorus application. In addition, we have buffer strips along creeks and water sources and utilize 100% no-till on our corn/soy rotation. I urge you to help fund the continued support for this type of approach. From a young producer standpoint, I understand the importance of this issue and hope that you do to. Timothy Keegan



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1104**.

**Timestamp** 1/17/2013 10:56

**Name** David Rydberg

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I urge you to support the Iowa Nutrient Reduction Strategy. As a farmer I understand the value of conservation first hand. We do not need more regulations, we need a science based approach that will do the most good with the least cost. Please help us by adequately funding the Strategy and other conservation cost share programs. David Rydberg

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1105**.

**Timestamp** 1/17/2013 11:05

**Name** Vincent Willey

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I urge you to fund conservation cost share programs. I have a 280 acre farm in the loess hills and I have cost shared a number of programs since 1955 when the farm was purchased and it is a much more productive farm today than in 1955. Please restrain from more rules and regulations that in many cases have no common sense. We have a large planet to feed and please do not strangle that production with sometimes science lacking rules and regulations Vincent Willey

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1106**.

**Timestamp** 1/18/2013 2:14 AM

**Name** carol olicker

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Policy**

**Nonpoint Source**

**Point Source**

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I strongly concur with Jack Engstrom's comments

Clearly, voluntary enforcement is a farce; it is actually a transparent non-enforcement policy

please read Jack Engstrom's points again.

And again.

And again.

He represents the thinking of thousands and thousands of Iowa voters.

We are not stupid.

We see that the government is being bought and paid for by the profiteers who are polluting our land and water and air for their own personal gain.

Our only recourse will be to vote you out of office ASAP if you continue to represent the profits of the few over the public good of the many.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1107**.

**Timestamp** 1/18/2013 2:16 AM

**Name** carol olicker

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I just wrote to reiterate Jack Engstrom's comments but I neglected to fill in my city and state, so I am doing it this time.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1108**.

**Timestamp** 1/18/2013 4:30 AM

**Name** Dale Escher

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Conservation practices are an expense to the land owner that is a long term benefit the waterways of the state. Cost sharing and a well planned science-based practice will assist the land owner to establish a program that will benefit the farm and the environment.

A voluntary program helps the land owner keep a positive attitude as to how he can contribute to protecting the land now and in the future.  
Dale Escher

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1109**.

**Timestamp** 1/18/2013 4:30 AM

**Name** Jeffrey Chown

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am sending this message to express my support for the Iowa Nutrient Reduction Strategy, a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

My fellow farmers and I believe voluntary conservation practices are the best way to protect water. We want to continue to be part of the solution, and support using ISU research to determine which practices are most effective when applied to Iowa's diverse landscapes. New costly one-size-fits-all regulations are not the answer.

I also ask you to support the adequate funding of the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Past failures to adequately fund these programs have delayed needed conservation projects.

Thank you for your service to the people of our great state, and for your work on behalf of Iowa's farmers and their stewardship of our natural resources. Jeffrey Chown

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1110.

Timestamp 1/18/2013 4:30 AM

**Name** Sam Kenkel

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

through out the past 20 years farmers as a whole have been using less fertilizer, utilizing less ground for production and still growing more of a crop. what does this say for us" it says we are using our resources more wisely. as this nutrient reduction strategy is assesed and viewed from every angle the need for a scientific based examination that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production is extremely important. another important issue is that funds for the iowa nutrient reduction strategy as well as the state's other conservation cost-share programs. failure to adequately fund these programs in the past have delayed much needed conservation projects. Sam Kenkel

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1111**.

**Timestamp** 1/18/2013 4:30 AM

**Name** David McKechnie

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I would like to urge you to support Iowa's Nutrient Reduction Strategy and other cost-share conservation programs. I have used No-till, waterways and grass headlands for over twenty years. Funding for these voluntary conservation programs that are science based help get farmers to try them. Next year I plan on using cover crops on my more eriodable ground to help reduce nutrient losses. David McKechnie



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1112**.

**Timestamp** 1/18/2013 5:15 AM

**Name** Mara Winningham

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I have seen first hand the damage caused by agricultural run-off. Streams where children once played are now off limits, choked with algae and foul smelling. This is where self regulation has gotten us.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1113**.

**Timestamp** 1/18/2013 5:56 AM

**Name** Robert Donahoo

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am in favor of the states nutrient reduction study. It makes alot of sense to fund a project of this great of inportance to stay ahead of any further regulations that might come from the EPA that might hurt our strong agg in Iowa. Robert Donahoo

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1114.

Timestamp 1/18/2013 6:47 AM

**Name** Mike Freiburger

**City** Dubuque

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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How come soil quality or better soil health was not addressed? good ways to increase the reduction is by maintaining nutrient and sediment on landscape.

There is no time line in how the reductions are to be achieve. or what will be achieve in a certain time frame>

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1115.

Timestamp 1/18/2013 6:57 AM

Name Merle Witt

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

We as farmers value the land and want to keep it and leave it in a better state than it was when we started to farm. Our current voluntary conservation practices will benefit our farms and surrounding environment. Keep government out of it. Farmers do a good job today or they would not be farming or raising livestock anymore. The industry has weeded out the farmers who didn't care and didn't do things right.

Again, I can not stress too much, support and fund the Iowa Nutrient Strategy plan. Thank you. Merle Witt

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1116**.

**Timestamp** 1/18/2013 7:03 AM

**Name** Joel Thorson

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I urge you to fund the Nutrient Reduction Strategy as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

As a former county conservation award recipient I feel that farmers are the best stewards for the land they operate. Having voluntary conservation practices is a must for the future of our water quality and soil. Helping farmers with their voluntary practices with cost share programs is a must. Joel Thorson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1117.

Timestamp 1/18/2013 7:09 AM

Name Troy Watne

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I am writing this in support of Iowa nutrient reduction strategy. This is a very important conservation piece but i feel it needs to be based on sound scientific research and also the ability to be a voluntary program and give farmers the chance to implement things that will work for their farming operations. Currently on our farm we do buffer strips along the Iowa river and creeks that flow to the Iowa river, we also implement some no till on land that is erodible to help control run off and soil erosion. We also started applying our nitrogen in the spring instead of fall and also in split applications to help in nitrate losses. Please keep this a voluntary program. I think we are doing a good job. Let us continue to help in this effort. Troy Watne

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1118**.

**Timestamp** 1/18/2013 7:09 AM

**Name** MARK MCGILL

**City** UDELL

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I WOULD ENCOURAGE YOU TO SUPPORT THE PROGRAM FOR NONPOINT SOURCE NUTRIENT REDUCTION BECAUSE I AS LONG AS OTHER FARMERS ARE ALREADY APPLYING PRACTICES TO REDUCE THE RUN OFF FILLED WITH NUTRIENTS. I HAVE ALL WATERWAYS SEEDDED 300 FEET ON EACH SIDE AND BUILT SEVERAL WATERSHED TO HELP ALSO. THANKS FOR YOUR SUPPORT WITH THIS PROGRAM. THANK YOU MARK

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1119**.

**Timestamp** 1/18/2013 7:13 AM

**Name** tim enderson

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I would like to comment on why I support the Nutrient Reduction Strategy:

1. Cleaner water for our next generation, can't go wrong in letting the Ia DNR, ISU college of AG, run the show. Other states come to us for the latest.
2. Let the word out on what type of practices work best in different areas. Communicate I guess.
3. Most of all please adequately fund this program, To be the best doesn't come without a price tag! tim enderson



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1120**.

**Timestamp** 1/18/2013 7:14 AM

**Name** Brian Klemme

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am writing to support the science based nutrient reduction strategy. On our farm we are already utilizing conservation practices such as grass waterways and buffer strips. We even install and maintain them at our own expense on ground that we rent. Given the chance I think most Iowa farmers will voluntarily comply with guidelines. Brian Klemme

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1121.

Timestamp 1/18/2013 7:21 AM

**Name** James Krull

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

We as farmer keep looking for ways to keep expences down with the price of fertilizer where it is no farmer will double the rate they use just for for the fun of it .

Equipment is being developed to put lesser amounts on poor soils and a larger amount on soil that will use more though growing crops , this is done with the use of GPS Equipment I also use injection Equipment to put it in the ground very close to where the crop will grow .

We keep testing use rates along with yields to minamize use the best we can .

The amount of nutrients applied per Bu. grown today is less than 10 years ago on my farm.

I will be looking every year to use less per bu. when I see it works , are freedom to use what works is what is making USA Farms as good as they are !!

Please Vote to keep that ability in the Farmers hands and not be regulated by another partys idea of what will work.

Thank you

Jim Krull , IA. Farmer James Krull

**Name** The Nature Conservancy**City** Des Moines**State** Iowa**Providing comment on the following sections:** Executive Summary Nonpoint Source Policy Point Source

Chuck Gipp, Iowa Department of Natural Resources

Bill Northey, Iowa Department of Agricultural and Land Stewardship

Nutrient Reduction Strategy

ANR Program Services

2101 Agronomy Hall

Ames, Iowa 50011-1010

Secretary Northey and Director Gipp:

Thank you for the opportunity to provide comments on the Iowa Nutrient Reduction Strategy Plan (hereafter "the Plan"). We commend Iowa's efforts to develop a comprehensive framework to address the state's contribution to the hypoxia issue in the Gulf of Mexico and to work to clean up Iowa's waterways.

The Nature Conservancy's mission is to conserve the lands and waters on which all life depends. We are a global nonprofit organization with a very local presence, having successfully worked in Iowa for the past 50 years engaging private landowners and local communities to conserve and steward Iowa's natural resources. Our vision in Iowa is to have healthy lands and waters and sustainable agricultural systems that support biodiversity and provide for the needs of people in Iowa and the world. The Nature Conservancy is a pragmatic organization that is grounded in science. For more than a decade, we have been actively working with partner organizations, stakeholders and private landowners throughout the Mississippi River basin to address altered hydrology and water quality issues that affect the upper basin as well as the Gulf of Mexico. In Iowa, this work includes our on the ground efforts to implement on-farm practices in the Boone River watershed to address soil health, water quality, and aquatic biodiversity and our work in the Cedar River basin focused on restoring altered hydrology and reconnecting the river to its floodplain, both of which benefit water quality. The Nature Conservancy's watershed work along with that of our partners in numerous other watersheds provides insight into what is working and what still needs to be accomplished. The lessons learned from these established watershed-based projects provide a foundation for scaling up to the state level.

The Nature Conservancy recognizes and applauds the ambitious goal set forth to reduce nitrogen and phosphorus by 45%. However, we feel the draft Plan needs improvement in order to provide a comprehensive framework to achieving this large-scale vision for Iowa's freshwater resources. To accomplish the objectives set forth in the Plan, change must occur much more quickly and to greater extent than previously achieved. This will require targeting of practices in priority watersheds to realize the greatest impacts, monitoring and measuring our progress, increasing traditional funding and creating new funding sources, improving our delivery of technical assistance and a better understanding the social barriers to adoption of best management practices. Success is going to be heavily dependent on federal farm programs so we need to influence the farm bill as well as the delivery of the resulting federal farm programs in Iowa. The objectives can be achieved but business as usual will not get us there - a long-term coordinated effort between all stakeholders including farmers, municipalities, businesses and citizens is essential. The Nature Conservancy respectfully submits the following recommendations and comments and would welcome participating in further development of the Plan.

1. The Plan should include a list of the priority watersheds and develop clear time-bound outcomes with interim milestones. The Nature Conservancy acknowledges that a 45% reduction in nutrients cannot happen overnight. Identifying priority watersheds will ensure limited resources are spent in those watersheds that contribute substantially to the problem. The draft strategy also does not clearly identify outcomes or provide milestones for non-point source reductions. Iowa State University completed an extensive scientific assessment of best management practices which provides an excellent platform to identify short and long-term outcomes. Interim milestones allow for effective evaluation of tangible progress. The science assessment evaluated combinations of practices and estimated costs associated with these practice combinations which illuminates the magnitude of the problem and solutions. The Plan, however, only identified these practice combinations as examples, not recommendations. We believe the Plan should recommend the practice combinations specific to each priority watershed that cumulatively contribute to reducing the State's nitrogen and phosphorus contributions to the Gulf by 45%. Providing recommendations for priority watersheds in combination with milestones will substantially strengthen the plan and capture the significant value of the science assessment.

2. We encourage an analysis of the multiple benefits of practice combinations. The Plan does not consider additional benefits beyond nutrient reduction. The best management practices and land use changes identified in the Plan provide additional benefits including flood risk reduction, improved wildlife habitat, drought mitigation, increased recreational and hunting opportunities, increased grazing and haying opportunities, and soil health improvements. A cost-benefit analysis that looks at these additional benefits would provide a more robust assessment of practices. Cover crops provide a good illustration. Cover crops can reduce nitrogen and phosphorus run off by 30% or more but also improve soil health, decrease soil erosion, and increase water infiltration (especially important during drought years). In fact, deep-

Name The Nature Conservancy

City Des Moines

State Iowa

Providing comment on the following sections:

<input checked="" type="checkbox"/> Executive Summary	<input checked="" type="checkbox"/> Nonpoint Source
<input checked="" type="checkbox"/> Policy	<input checked="" type="checkbox"/> Point Source

rooted cover crops may increase subsoil water holding capacity from 1.7 inches to 4.2 inches. These additional benefits may outweigh the cost from reduced corn yields providing an overall positive benefit to the producer.

The plan also encourages market-based approaches such as water quality trading credits. Credit trading has been effective in other parts of the country when there are regulatory caps on nutrient losses. But in Iowa, there may not be enough regulated point sources in a watershed to make credit-trading and other market solutions viable. However, there may be market-based opportunities to address nutrient reductions in watersheds if other societal benefits are also considered  including flood risk reduction, soil health, recreational opportunities and wildlife habitat improvements.

3. Watershed level goals should be established in the Plan while specific practices are tailored to individual farms. The Plan assesses in-field and edge of field best management practices, but there is no mention of  watershed scale  practices such as retirement and restoration of frequently flooded agricultural land and integrated management frameworks (i.e. watershed management authorities). While the Plan describes the contribution of land use changes to the nutrient problem, there needs to be a discussion of the systematic solutions needed for land use changes to occur. Indeed the science assessment found that the most effective nutrient reduction practices were land use change practices. This requires looking at the watershed level, not just at the farm level. This does not mean implementation has to be mandatory at the farm level, but it does require analyzing new ways to provide incentives to groups of landowners at the right scale (such as at the drainage district scale) to solve the broad-scale water quality problems. This systematic approach can be best achieved with limited funds by implementing practices and land use changes that provide multiple benefits  in other words, adopting an integrated watershed management framework.

4. We encourage an analysis of the social barriers to widespread adoption of best management practices. The proposed solutions (pilot projects, improved efficiencies, outreach and collaboration, increased public awareness and recognition and relying on existing funding sources) do not appear to be vastly different than the tools and approaches used over the last 20 years. The Nature Conservancy encourages a thorough analysis of the social barriers and triggers that are affecting the broad scale adoption of best management practices evaluated in the science assessment. If Iowa is going to be successful at reducing nitrogen and phosphorus loads with a voluntary framework, additional tools beyond financial incentives and cost-share programs are needed to compete with high commodity prices.

5. The Plan should establish baselines and commit to measuring and reporting annual loads such that we can evaluate our progress toward 45% reduction. Quantitative load estimates are being developed by the DNR's Geologic and Water Survey, USGS and University of Iowa for various monitored locations and can provide a platform for improving reduction goals and monitoring. We encourage the State of Iowa to implement an adaptive management framework, by setting interim goals, documenting the assumptions made with those goals, and evaluating on a regular basis as we move forward with implementation.

6. We suggest the Plan include a more thorough analysis of implementation costs as well as explicit funding opportunities and approaches. The Plan gives little mention to the magnitude of the funding disparity to implement at the scale needed to achieve a 45% reduction in nutrient loading. The cost analysis indicates between \$1.2 and \$4 billion is needed for initial implementation of the practices. The Plan specifies that initially Iowa will rely on existing funding sources (or reallocation of existing funding sources) to implement the strategy; however, at the same time the Plan recognizes that these funds are often limited and oversubscribed. Indeed, since 2002, state funding for water quality programs has dropped by 22%. It is not enough to be satisfied with  the pace of implementation being subject to available funding. The Plan should include strategies for ramping up and at least doubling current funding for voluntary conservation incentives from the legislature over the next 10 years and prioritize how those funds will be spent.

With dwindling public sector resources, we need to look to the private sector to share the financial burdens. Agribusinesses and other businesses within the agronomic supply chain already are contributing to programs that address water quality problems. Coca Cola, Inc. has invested in water quality programs in the Upper Cedar watershed, supporting an 80 acre wetland restoration at the Brownville Wildlife Area near Osage, Iowa which captures water draining from 1,595 acres of cropland. Clean water and continued availability of corn syrup are not mutually exclusive for businesses like Coca Cola, Inc. In the Raccoon and Des Moines watersheds, Agriculture's Clean Water Alliance provides another example of the agricultural retail industry investing in water quality improvement solutions. These examples as well as polling data and the 2010 voter-approved establishment of Iowa's Natural Resources Trust Fund illustrate the people of Iowa care significantly about clean water and are willing to spend additional resources to address the problems. This Plan has an opportunity to shape and guide the creation of new investment opportunities and we encourage the State of Iowa to establish a framework to facilitate and encourage private investment into conservation practices.

Efficiency is identified as one means of maximizing benefits and The Nature Conservancy encourages improving the effective use of limited resources. The state's capacity to deliver programs and to provide technical assistance to farmers is at an all-time low. We are pleased to see the call for an expanded and enhanced public-sector initiative to assist farmers and a call for new and enhanced private-sector roles. Our experience in the Boone River watershed indicates that the private sector can work closely with the public agencies to provide enhanced delivery of programs.

7. We recommend the Plan explore opportunities for the State to influence federal policies that are counter to achieving water quality improvement. The US farm bill legislation provides a significant influence on the farming practices and we encourage the State of Iowa to support coupling conservation compliance to federally supported crop insurance and other federal support.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **3** of comment #**1122**.

**Timestamp** 1/18/2013 7:21 AM

**Name** The Nature Conservancy

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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The Plan is a first to bring together point-source and non-point source reduction into one document and Iowa is leading the Midwest in preparing a statewide strategic plan. The Nature Conservancy recognizes this document as a first step to developing a comprehensive plan. Establishing concrete objectives and goals, prioritizing watersheds, identifying funding sources and strategies to meet these goals are critical. The Plan establishes the Water Resources Coordinating Council (WRCC) as the entity that will operationalize the Plan and we encourage a more transparent and open dialogue with the citizens of Iowa as the WRCC establishes watershed priorities and develops specific objectives. The Nature Conservancy looks forward to working with the State and with stakeholders to address these pressing issues affecting the quality of Iowa's freshwater resources and the Gulf of Mexico.

Sincerely,

Jan Glendenning

Iowa State Director

The Nature Conservancy

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1123**.

**Timestamp** 1/18/2013 7:24 AM

**Name** Kevin Green

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I have made the commitment on our farm that cover crops and terraces will be a permanent practice. Cost share programs have been helpful in implementing these practices, but much more is needed. I would invite you to our farm for a first hand look at manure application, cover crops and terraces at work. Kevin Green

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1124**.

**Timestamp** 1/18/2013 7:26 AM

**Name** Jeff Westrum

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I urge you to support Iowa's Nutrient Reduction Strategy. I believe this is an important issue. I don't like seeing our excess nutrients end up in the gulf of Mexico. Having conservation programs in place help give initiative and ideas to what we as farmers can do to help. Terraces and waterways are some of the things we have to do to reduce nutrient runoff. But there is always more that all of us can do, and with the state funding it is more likely that they get done. I thank you for taking the time to read this and hope you can make it happen. Thanks Jeff Westrum

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1125.

Timestamp 1/18/2013 7:31 AM

**Name** Bryan Reed

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I strongly support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

On my farm I have implemented many voluntary conservation practices to protect our soil and water which include no-till planting, waterways, constructing terraces and ponds, variable rate fertilizer application, cover crops, crop rotations including hay and pasture, and moving my cattle feedlot into a covered hoop barn. In the future I would like to build more terraces and ponds which would be much easier with full funding of the state cost share program. I would also be interested in any new conservation practices that would protect the soil and water with implementing and funding of the Iowa Nutrient Reduction Strategy. Bryan Reed



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1126**.

**Timestamp** 1/18/2013 7:34 AM

**Name** Mason Loftus

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I would like to express my support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge you to vote to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. Mason Loftus

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1127**.

**Timestamp** 1/18/2013 7:36 AM

**Name** Darren Stadtmueller

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I am writing in support of the nutrient management strategy currently proposed by Secretary of Agriculture Bill Northey and the Iowa DNR.

This science based voluntary program will provide the flexibility that producers need to stay economically competitive while still helping the environment by reducing runoff. On my farm we are already using many of the practices promoted with this plan, such as strip-till and no-till tillage practices and banding of fertilizer. We also have established buffer strips near creeks and streams. Promoting these strategies and providing funding to assist producers in the implementation of conservation efforts is crucial. A top down one size fits all strategy developed in Washington DC will hamstring producers and endanger the United States role as the leading food and fiber producer in the world.

Please lend your support to the Northey/DNR plan. Darren Stadtmueller

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1128.

Timestamp 1/18/2013 7:45 AM

Name Steva Haeflinger

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

Voluntary conservation strategy is a move in the right direction!

The strategy is a science and technology based approach developed by the Iowa Department of Agriculture and Land Stewardship (IDALS), the Iowa Department of Natural Resources (DNR), and Iowa State University (ISU) to encourage the adoption of voluntary conservation practices that will have the greatest benefit for water quality in the state. It uses ISU research to determine which practices are most effective when applied to Iowa's unique landscapes. The strategy outlines these efforts in a scientific, reasonable and cost-effective manner, an approach supported by Farm Bureau members.

Some groups and individuals are already saying the Iowa Nutrient Reduction Strategy won't work. They believe voluntary conservation practices on farms do very little to protect water. They're calling for more regulation of farms, similar to the costly one-size-fits-all regulations imposed on farmers in the Chesapeake Bay area.

Farmers know better! We want to continue to be part of the solution, but know that new regulations aren't the answer. New regulations only stifle growth of our economy and encourage lawbreakers to find loop holes. Farmers are not bad people and want to maintain the profitability of our operations in a way that does not hurt the long term goals of passing on quality to our children. Steva Haeflinger

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1129**.

**Timestamp** 1/18/2013 7:53 AM

**Name** Calvin Rozenboom

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Citizens of Iowa expect and deserve modern conservation measures be adopted by those engaged in agriculture. I fully support the proposed science-based nutrient reduction strategy that recognizes the importance of voluntary conservation practices. Education and research are much more effective than one size fits all regulation.

Farmers in Iowa have proven over the last few decades that they are committed to conservation demonstrating the need for continued commitment for adequate funding from our legislators. We can successfully meet the expectations of all of Iowa if we work together.

The future water quality of Iowa and this nation is in our hands. Please consider how action on your part can deliver results Calvin Rozenboom

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1130.

Timestamp 1/18/2013 7:57 AM

**Name** Douglas Nolte

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Express your support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

Urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

Share voluntary conservation practices you've already implemented and those you hope to implement in the future to benefit your farm and the surrounding environment.

Make sure this program changes with different yield

goals in the future. We try to increase yields, those nutrients may need to increase. I do not want this to restrict our ability to change yield goals in the future. Douglas Nolte

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1131.

Timestamp 1/18/2013 8:00 AM

Name Justin Lain

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

No one knows Iowa agriculture better than Iowa farmers. It is important for Iowans to take conservation serious as the land is the backbone of our economy.

By using a science based approach to nutrient reduction it will best serve Iowa's farmers and protect our land and water. We can use conservation and other farming practices to show that we can meet guidelines while not harming our farming economy. My family uses contour no-till farming with terraces as well as split applied nitrogen practices. These practices need to be encouraged to farmers around the state.

Please fund the Iowa Nutrient Reduction Strategy to help farmers implement this program to help Iowa's economy. We simply can't afford to be pushed into new rules and regulations made by Washington. We can use Iowa based research and practices to control our own future with your funding. Justin Lain

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1132**.

**Timestamp** 1/18/2013 8:05 AM

**Name** Sue Brozik

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I believe that it is vitally important that we recognize the need for science based voluntary conservation practices. We as farmers know our land better than anyone and we know the best and appropriate places on said farm to implement the most efficient conservation practices to benefit everyone. It is for this reason that the state's other conservation cost-sharing programs need to be adequately funded. Voluntary conservation practices are the backbone of maintaining our state's agricultural production.

Thank you for supporting our state's farming families. Sue Brozik

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1133**.

**Timestamp** 1/18/2013 8:15 AM

**Name** Rodney Koch

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

The conservation cost share programs need to be funded to protect the land that we farm. I protect the land by ontill the ground that I farm and save the soil. Rodney Koch



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1134**.

**Timestamp** 1/18/2013 8:31 AM

**Name** Peter Seehusen

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Please continue to support programs that research and develop conservation practices. Along with supporting conservation practices PLEASE do not make any practices/programs mandatory or regulated by any state or federal agency. Urge farmers to volunteer for certain practices. No one knows their land and operation than the farmer or rancher themselves. Thank you for your service! Peter Seehusen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1135**.

**Timestamp** 1/18/2013 8:35 AM

**Name** Brian Rohrig

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

As the need for food and fuel grows, I'm not sure agriculture will be able to reduce the amount of nutrients applied to the soil that are removed from the soil in our quest to feed and fuel the world.

However, if demand for food and fuel starts to wane, I would support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

If it is necessary to reduce nutrients applied per acre, I also urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Brian Rohrig

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1136**.

**Timestamp** 1/18/2013 8:36 AM

**Name** Craig Sage

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I support the proposed science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. It is important for the Iowa Nutrient Reduction Strategy to be adequately funded, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. Over the last several years, we have added waterways to benefit our farm and the surrounding environment. We hope to do more in the future. Craig Sage

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1137.

Timestamp 1/18/2013 8:37 AM

**Name** Jacque Hough

**City**

**State**

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

We in rural Iowa would like to see lawmakers support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

The Iowa Nutrient Reduction Strategy needs to be fully funded along with Iowa's other conservation cost-share programs. Our failure to appropriately fund these programs in the past has stood in the way of paying for needed conservation projects, and sometimes put the farmer in additional financial stress trying to pay for more on his own.

We, as Iowa farmers, are proud of our land and the ability to care for it the best way possible. With the ever tightening economic troubles we aren't always able to do as much as we would like. That in turn is why we need to fund the conservation cost-share programs along with studies and future conservation practices.

On our farm we have added terraces, waterways, ponds, planted trees/shrubs, tile, buffer strips above ponds and ditches. We have kept fence lines in and use the area for wildlife habitat. Would like to plant some more trees but with the drought we have put this off. Jacque Hough

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1138**.

**Timestamp** 1/18/2013 8:43 AM

**Name** Larry Besch

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I support the need science-based state nutrient reduction strategy and the need to continue the conservation practices already used by farmers.

There are rules and regulation already that are already used by farmers to ensure safe and sound use of a natural nutrient. Larry Besch

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1139**.

**Timestamp** 1/18/2013 8:50 AM

**Name** Ronnie Gruenhagen

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I encourage you to support the Iowa Nutrient Reduction Strategy, because it allows me to use the approach for my farm's requirements and needs to achieve the best water and air quality. Ronnie Gruenhagen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1140**.

**Timestamp** 1/18/2013 8:56 AM

**Name** Lee Ellickson

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I think we need to keep our farming practices contour minded so we save runoff . I think we need to look at the future of this frac sand mining as the fact they get with in 5 ft of the water levels at times . I belive this would have to biggest impact on water quality . As they are trying to get into Allamakee county to mine this sand. Lee Ellickson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1141.

Timestamp 1/18/2013 9:13 AM

Name Jody Martens

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

My family and I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. It uses ISU research to determine which practices are most effective when applied to Iowa's unique landscapes. The strategy outlines these efforts in a scientific, reasonable and cost-effective manner.

We urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. We've already taken highly erodible crop lands and turned them into pasture for our cattle, in part due to the cost sharing programs that allowed us to make the transition without a large financial burden.

The costly one-size-fits-all regulations imposed on farmers in the Chesapeake Bay area, would be detrimental to our small family run livestock operation. We're young farmers that try to be environmentally conscious and would like to grow our operation if we're able to do so without the heavy restrictions of government regulation.

Please enforce the laws that are on the books for the operations that are in violation of these laws, but please don't add costs to our business when we are already doing the right things. Jody Martens



**Name** Kevin Condon**City** Des Moines**State** Iowa**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input checked="" type="checkbox"/>	<b>Point Source</b>

January 18, 2013

The Honorable Bill Northey  
Iowa Secretary of AgricultureThe Honorable Charles Gipp  
Director, Iowa Department of Natural ResourcesWallace State Office Building  
Des Moines, IA 50319

Dear Secretary Northey and Director Gipp:

The 1,400 members of the Iowa Association of Business and Industry (ABI) care deeply about the environment as business and community leaders who have chosen Iowa as the place to call home. As traditional "point sources" ABI members have been watching with interest the developments surrounding the Nutrient Reduction Strategy (the strategy) that has been crafted by the two state departments you lead. ABI appreciates the efforts made by the Iowa Department of Natural Resources (DNR) and the Iowa Department of Agriculture and Land Stewardship (IDALS) to come together to develop one strategy to address the impacts that point and nonpoint sources have on the nutrient loads to Iowa waterways. ABI believes that accessible and safe water is a benefit to all Iowans and makes Iowa a more attractive place to live and do business.

On December 3rd, ABI President Mike Ralston wrote to you requesting an extension of the public comment period for the nutrient strategy as our members believed it was too aggressive at 45 days and overlapped the observance of three separate holidays. We appreciate the final determination to extend the deadline in order to allow for a more adequate review of the strategy documents. As with any effort of this magnitude, we understand that you have to start somewhere. After careful analysis of the strategy it seems clear to ABI that more work is needed to refine the contents and clarify certain aspects that will impact point sources significantly. I will do my best to outline ABI's initial comments on the plan and trust that the DNR and IDALS will seek further input and collaboration with industry members as the process continues in the lead up to implementation.

#### Recognition of the "Point of Diminishing Returns" Concept

In economics, the point of diminishing returns is, according to Merriam-Webster's Dictionary, "a rate of yield that beyond a certain point fails to increase in proportion to additional investments of labor or capital." The strategy put forth calls for point sources to incur an involuntary cost of \$1.533 billion dollars in capital infrastructure and technologies with an annual operating cost of \$114 million dollars. Iowa's employers and their employees along with every taxpayer served by municipal facilities are going to be asked to invest a great deal of resources in order to achieve their proportion (4% - Nitrogen, 16% - Phosphorous) of the 45% nutrient reduction goal outlined in the strategy. There must be an acknowledgement by DNR and IDALS that point sources are quickly approaching a scenario where additional "improvements" to treatment facilities will simply not be justified under any economic or environmental formula.

#### Place Emphasis on Regulatory Certainty for Point Sources

ABI members can appreciate the strategy's effort to create as much regulatory certainty as possible with such an expansive goal. Any assurances that DNR and IDALS are able to afford point sources during the implementation of the strategy will benefit the people and places where nutrient reductions are aimed. While the point source side focuses on ten year windows of regulatory certainty and twenty year windows of technology design life, the final strategy must consider "off ramps" for point sources when those windows close unexpectedly. Current legal, economic and political winds are tragically unpredictable and considerations need to be made about how any future developments may impact the feasibility calculations the DNR will utilize when issuing National Pollutant Discharge Elimination System (NPDES) permits.

To that end, NPDES permit expiration should be the only qualifying event for implementation of the nutrient strategy. Currently, NPDES permits may be amended prior to the five year renewal cycle for various reasons. When point sources are planning for production expansions that will increase nutrient loads, the imposition of nutrient limits is appropriate from a design and planning perspective. However, permits are routinely opened for a variety of minor issues, including changes in chemical additives or other minor production changes. Addressing the nutrient reduction strategy through NPDES permits should wait until the permit expires so that promised regulatory certainty and planning can be realized.

#### Further Revisions to Draft Nutrient Permit Requirements Language

ABI received a draft document from the DNR that was not available during the initial release of the strategy. The document was draft permit language that will be used to implement the nutrient reduction strategy in NPDES permits and was intended to provide some additional clarifications to questions surrounding the proposed nutrient reduction feasibility review process. This draft permit language describes how the permit holder will be required to study treatment technologies that would achieve significant reductions in the amounts of total nitrogen and total phosphorus discharged with a goal of achieving annual average mass limits equivalent to concentrations of 10 mg/L total nitrogen (TN) and 1 mg/L total phosphorus (TP) for plants treating typical domestic strength sewage. This language should be modified to also address plants treating wastewater with total nitrogen and/or total phosphorus concentrations greater than typical domestic strength sewage. In this case, the evaluation should include projected reductions in nutrient loads achievable with the application of economically and technically feasible treatment technology. A target percent reduction in nutrient loads could be included.

Similarly, the permit requirement language should be modified to allow for a "no action" outcome for facilities that find that their effluent is already at or below the proposed TN and TP limits. For facilities withdrawing surface water, ABI asks that discharges such as once-through cooling water be exempted from the limits, and that other discharges would be subject to the limit on a net-addition basis to account for existing concentrations in surface water.

Also, a discussion of timing would help affected facilities to understand the time frame that might be acceptable to DNR. We appreciate the flexibility provided for facilities to work with DNR to develop an implementation schedule, but guidelines on the timing would help facilities with planning. For example, if new construction is required, a facility could expect that new limits would not take effect until the NPDES permit

Name Kevin Condon

City Des Moines

State Iowa

Providing comment on the following sections:

<input checked="" type="checkbox"/> Executive Summary	<input type="checkbox"/> Nonpoint Source
<input checked="" type="checkbox"/> Policy	<input checked="" type="checkbox"/> Point Source

renewal cycle that follows the first permit implementing the nutrient strategy. While ABI recognizes the unprecedented nature of this strategy, a measured approach needs to be underscored so as not to create a competitive disadvantage for Iowa industry.

#### Opportunity to Review Revised Nutrient Strategy

There will likely be significant changes to the draft strategy based on public comment. Therefore, ABI requests the opportunity to review and further comment on the revised draft strategy prior to final publication and implementation.

For example, ABI requests that the departments justify the inclusion of the industrial facilities not originally named in the strategy upon its initial release in November 2012. As of January 8, 2013, the online documents hosted by Iowa State University still had yet to reflect the inclusion of these facilities. The strategy doesn't clearly provide point sources the rationale used by DNR to include these facilities. Explaining this in the strategy would help clarify what formula or definition is being used to evaluate point sources.

Further guidance is also needed regarding what steps will be required of facilities following the initial discovery of nutrient concentrations above the threshold limits of 10 mg/L TN and 1 mg/L TP. ABI would appreciate clarification on who is responsible and qualified to perform nutrient level testing of point source discharge waters. It is unclear if DNR anticipates allowing facilities to perform testing using their own resources or if an independent contractor or third party will be required to perform the tests during the various stages of the strategy, should the nutrient threshold be surpassed at an individual facility.

Questions have also surfaced around the possibility of a retesting period following the initial discovery that a facility's effluent is above the established TP and/or TN threshold. There appears to be no indication of how DNR plans to approach situations where the nutrient threshold is breached by a narrow margin and might be found later to have been an anomaly based on follow-up testing. That is, the process that is put in place following the initial detection of the nutrient threshold should be one of verification followed by mitigation. Allowing point sources a reasonable period of time to swiftly correct marginally higher levels of nutrient load before retesting would be a positive development. ABI believes that there will be instances where the point source can more efficiently achieve compliance with the strategy if afforded an opportunity to adapt their internal treatment processes to meet the threshold before a verification testing would occur.

Another area of concern that should be addressed in a revised strategy document is whether point sources not listed in the strategy could be impacted as "indirect dischargers" if the point source is connected to a Publicly Owned Treatment Works (POTW) facility. According to the strategy, it is expected that most major municipal wastewater treatment facilities (>1 MGD AWW Flow) can economically meet technology-based TN limits of 10 mg/L and TP limits of 1 mg/L on an annual average basis with biological nutrient removal (BNR) technology. Industrial facilities that discharge to these POTWs may be affected by the strategy as indirect dischargers even though they are not on the point source list included with the strategy. Further clarification should be provided by DNR regarding whether it will take any action toward these indirect dischargers, or if it will be up to the POTW to determine whether changes to pretreatment limits will be required of facilities that discharge to their treatment plant.

#### Only Require Monitoring Upon NPDES Permit Renewal

To date, there are 148 point source facilities listed in the strategy. The State of Iowa currently has many more NPDES permit holders. It would be important for ABI members to have a better understanding of DNR's intended approach to the NPDES permit holders and other point sources that are not specifically named in the current strategy. ABI would like to know if there will be nutrient data collection requirements for all NPDES permit holders that could result in additional industrial facilities being required to implement the nutrient strategy.

The draft strategy listed 28 industries with biological treatment for process waste as those industries that would be required to implement the strategy. After the draft strategy was released, DNR added 18 industries to the list that are "major" under NPDES rules. However, it is unlikely that these additional industries have operations that result in significant nutrient loads. One interpretation of the draft would mean that the strategy requires each permitted facility to conduct a feasibility study during their permit renewal process. In the event significant nutrient loads are discovered during the feasibility study, the nutrient strategy requirements would then become applicable. Therefore, ABI again requests that DNR only require nutrient monitoring for these additional facilities at the time of their NPDES renewal following expiration.

#### Exploration of "Nutrient Marketplace" Warranted

ABI members were encouraged to learn some time ago that a process was underway and a partnership had been established by IDALS and DNR to produce a nutrient reduction strategy. ABI has long held the belief that any serious effort to remove nitrogen and phosphorous from Iowa waterways would require both point and nonpoint sources to be involved as proportional contributors to present day nutrient loads. While ABI will continue to review this strategy and its further development and implementation we must also recognize the potential opportunity that lies before this state. The strategy briefly mentions on page 17 "credit trading" under the section discussing the effectiveness of point source permitting. ABI members would welcome a deeper discussion about what a market based approach would look like.

To be clear, ABI is not endorsing the "credit trading" idea but we are intrigued by the prospect and willing to discuss how industrial point sources could contribute to that effort. Other states have unsuccessfully attempted similar approaches and without further development and input from the business community we would be concerned the Iowa strategy would suffer the same fate.

Topics for further consideration may include:

- Creating a system that allows public utilities to reduce their environmental compliance costs by contracting with agriculture to reduce nutrient loading.
- NPDES permit holder being allowed to minimize compliance costs through offsets and pollution reduction pooling among permit holders (point source to point source trading).
- Encouragement and promotion of trading and offset agreements without creating centralized "banks" or trading bureaus.
- Establishment of a mechanism for ABI and other point sources to monitor and comment on the nonpoint source nutrient reduction progress. Because nonpoint sources will not be bound by permits or regulatory requirements to reduce nutrient loads and because funding for nonpoint source nutrient reductions can vary significantly, ABI is concerned that nonpoint source reductions might not occur as outlined in the strategy.
- Transparency in the activities of the Water Resources Coordinating Council and Watershed Planning Advisory Council that will provide the State with ongoing information and expertise on cost effective nutrient reduction solutions.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **3** of comment #**1142**.

**Timestamp** 1/18/2013 9:15 AM

**Name** Kevin Condon

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input checked="" type="checkbox"/>	<b>Point Source</b>

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Again, thank you for your consideration of these initial comments on the nutrient reduction strategy. Although ABI had a designated representative involved in the strategy development, ABI members at large were not allowed to review the strategy until it was released publicly on November 19, 2012. We will continue to analyze the strategy and look forward to additional opportunities to provide input on the various sections of the plan that must undergo revision and further development. ABI stands ready to continue to contribute to the discussion of how point and nonpoint sources may successfully achieve the goal of nutrient reduction in Iowa.

Respectfully,

Kevin Condon  
Director, Government Relations

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1143**.

**Timestamp** 1/18/2013 9:22 AM

**Name** Randall Nelson

**City**

**State**

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

I am writing to encourage you to support funding for the Nutrient Reduction Strategy program. The voluntary practices that the Strategy will advance are much preferred to ones mandated by the federal government. As a farmer, I am concerned that a one size fits all, top down approach will in effect become a permit to farm. The choice of practices advanced by the Nutrient Reduction Strategy just make more sense. We have been long time participants with the NRCS and the FSA in building soil saving terraces, waterways, drop inlets with catch basins and no tilling the land. I believe that most farmers will, if presented the facts in a non threatening way, will adapt those practices that fit their farms and existing structures.

Iowa farmers are very creative and early adaptors of technology. We are the envy of the world, as we have some of the best soils and are leaders in advancing new technology. My fear is that any alternative to the Nutrient Reduction Strategy will impede new technology and freeze Iowa agriculture in time. Iowa has a billion dollar surplus due to better State fiscal management and due to a vibrant agricultural sector. We need to get in front of this perceived problem and lead our way out, rather than be led from the rear by the Federal government. It is clear to me that the State of Iowa must remain a leader in soil stewardship and the Nutrient Reduction Strategy is the best way to help Iowa farmers retain the soil and improve water quality. Please support funding for the Nutrient Reduction Strategy and other conservation practices. Randall Nelson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1144.

Timestamp 1/18/2013 9:28 AM

**Name** Edward Yarkosky

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

We need to support voluntary conservation practices that will help nutrient reduction strategy based on real science based research.

We need to fund this strategy with conservation cost share programs. If we don't keep these programs up we will fall behind and end up trying to push unnecessary laws later down the road.

I my own farm I us a rotational program and try to keep my hill groung seeded down. I know that there are many things that we can do and research will help farmers make good decisions. Edward Yarkosky

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1145.

Timestamp 1/18/2013 9:29 AM

**Name** Jonathan Brown

**City** Dubuque

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The Iowa Nutrient Strategy is in real practical terms the first time the non-point (ag) and point source (Cities) communities have produced a document that with reasonable clarity identifies and agrees on the sources of the nutrients of concern. This is in itself a major breakthrough and the effort should be noted.

There are some real issues related to the fact that the point sources will be required to reach limits whereas the non-point sources the reaching of the goals is on a volunteer basis. I understand that in reality this approach may be driven by the fact that the Clean Water Act has no real authority over non-point sources. For the point sources to support this approach it would be helpful to have some assurance that if this strategy does move forward and if the overall goals are not reached that the point sources will not be required to do more. The point sources could spend millions, if not billions, remove all traces of nutrients and the real issue of nutrient loading to the Gulf from Iowa would not have been addressed.

An important consideration is that the standards proposed for point sources are quite reasonable in the major scope of things. By reasonable I mean that they are able to be reached using biological means without a heroic effort to remove that last bit of nitrogen and phosphorous. My reading indicates that the limits for point sources would be no more stringent than 10 mg/L for nitrogen and 1 mg/L for phosphorous and possibly less stringent.

Overall I support the Strategy with some reservations, mainly the non-numeric and volunteer approach for non-points. However with that said it is the opinion of most in the industry that nutrient limits will someday be imposed on the point sources and that the levels set under the Iowa Nutrient Strategy at least provide reasonable and achievable limits over an extended period of time to reach those limits. As stated above some assurance that point sources will not be asked to reduce nutrient levels to even lower and more expensive levels not be required if the reduction goals are not met by the non-point community.

Jonathan Brown

790 Caledonia Place

Dubuque, Iowa 52001

Name Eric Sytsma

City Oskaloosa

State Iowa

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

Drake Larsen said it better than I can, but I agree completely.

"I am writing in comment to the Iowa Nutrient Reduction Strategy draft, released November 2012. A state level strategy focused on Iowa's water quality is greatly needed. The partnership forged between IDALS, IDNR and ISU-CALS is to be commended for taking the first step. I am confident that this partnership provides the critical institutional support required to assemble the diversity of stakeholders that needs to be at the table for the task of improving water quality in Iowa.

The draft document provides a thorough overview of the current science regarding water quality management practices. However, with respect to non-point source nutrients—namely those of agricultural origin—an actionable strategy is profoundly lacking. Understanding that structured decision making is an iterative process, the strategy draft can serve as a tool kit moving forward. Now we need a step-wise plan for getting these and other changes implemented. We need leadership for getting boots on the ground.

The draft is described as being a science and technology based approach, and indeed it is. Regrettably land management is inherently more than that. The authors from ISU-CALS overlooked multiple disciplines at their disposal that could have provided invaluable insight into the creation of a tangible nutrient reduction strategy. For example, within CALS there are professors of rural sociology that have published on the adoption of agricultural practices, on the diffusion of innovations, and even on watershed work in Iowa; their work is not cited, nor is there a plan for facilitating the widespread adoption of the practices discussed. Likewise, there are professors of ecosystem management; their work is not included in the draft nor are the tenets they teach even considered. Overall, the science regarding farmers and citizens was not included and these people are similarly ignored in the strategy.

The draft calls for a voluntary approach for ameliorating corn and bean agriculture's negative impact on water quality. The draft does not explain how this is different than what has been done in the past; an approach that has created the problems we currently face. I recently asked an Iowa farmer his thoughts on a voluntary approach, his response, "You do what you've done, you get what you've gotten." More plainly, a long-time Iowa Soil and Water Conservation District commissioner told me, "Voluntary doesn't work."

In discussion surrounding this draft document "voluntary" is often cast as an alternative to "regulation". This is a black-and-white fallacy that seems to have infected the NRS document as well. Between these two philosophies there is a lot of room for the state of Iowa to play a larger role in provisioning clean water for its citizens. Passively relying on voluntary action is no plan. The prioritization of watersheds and watershed resources coordination, outlined in the draft, is all for naught if the science of targeting is not followed through to the field level.

No individual's comments will contain the perfect formula for solving our water quality issues, which is why moving forward this process needs to be open to a diverse array of ideas from the whole spectrum of stakeholders, Iowans. I suggest the next draft include bigger, state-scale ideas along the lines of:

- state support for marketing the products of extended crop rotations and alternative agricultures
- property tax incentives for stewards of water quality
- state-of-the-art remote sensing for the targeting of high pollution source areas
- mandatory minimum width riparian buffers along all waterways
- an anhydrous ammonia tariff to fund wetland restoration and construction
- full funding of all existing water quality programs such as REAP and the Iowa Water and Legacy Fund"

Sincerely,

Eric Sytsma

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1147**.

**Timestamp** 1/18/2013 9:40 AM

**Name** Lindsey Larson

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I am writing to urge your support for a science-based state nutrient reduction strategy that focuses on voluntary conservation practices. I believe almost all producers have a conservation ethic instilled in them as farmers from a very early point in their careers. I have used many conservation practices over my career, including grassed waterways, buffer strips, terraces, hay ground and no-till planting. I have done these things because it is and will be the right thing to do for the present and future productivity of the land we care for. The other reason I have used these practices is because I believe I know best what will work on the ground I farm not some one who works under the guise of regulations that are the same for every farmer regardless of the land they are operating. Lindsey Larson



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1148**.

**Timestamp** 1/18/2013 9:43 AM

**Name** Tom Cheney

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I am a fourth generation farmer that strongly believes in passing on the family farm. My main concern is protecting the soil and water quality so that the next generation can farm. I am currently using buffer strips along rivers and streams, and a vertical tillage program that leaves a high amount of residue on the grounds surface. I also use a hay rotation and fall cover crops to conserve soil erosion.

Farmers and land owners are very concerned with land stewardship and need to have programs available to use such as cost-share, and the Iowa Nutrient Reduction Strategy. Please protect farmers against expensive blanket regulations with funding for voluntary conservation programs.

Sincerely,

Tom Cheney Tom Cheney

**Name** John Cook**City** Carroll**State** Iowa**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Externalized costs are being unfairly passed along to me and to all Iowans and to some of those beyond our state's borders. Inadequate laws and inadequate enforcement of existing laws allows some farm owners to avoid responsibility for controlling pollution that travels beyond their property.

Water pollution is an externality that has real costs. I'm on rural water, and the additional cost of treating polluted water shows up on my bill. Nutrient runoff from farm fields increases treatment costs everywhere downstream, whether it's Dedham, Coon Rapids, or Des Moines. Water pollution reduces the recreational value of our streams and rivers, and it continues on downstream through the Missouri and Mississippi watershed all the way to the Gulf where it causes real economic harm to fishery resources.

Nonpoint source water pollution comes both from livestock operations and row crops. There needs to be stronger permitting standards and strict enforcement to stop runoff from CAFOs and manure spills. Don't allow manure to be spread on frozen ground or soybean fields. There also needs to be better enforcement of conservation measures such as stream buffers, grassed waterways, and keeping cattle out of waterways. Voluntary measures are not enough. There may be things the state could do to provide a carrot as well as a stick to encourage good practices, perhaps through property tax adjustments. Increase tax on ag land, then forgive the increase when the approved practices are used. Also, tax the portion of farm land at a lower rate that is in conservation practices, not row crops.

Implementing effective policies will require much more effort by the state than it has demonstrated yet -- more funding and more staff for the DNR. Those funds should come from those contributing to the pollution via property taxes on ag land and permit fees for CAFOs.

Thank you for considering my input.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1150**.

**Timestamp** 1/18/2013 9:47 AM

**Name** Richard Paul

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I would like to express my support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. Richard Paul

**Name** John Dunn, Director, City of Ames**City** Ames**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

On behalf of the City of Ames, please find below comments on the draft Iowa Nutrient Reduction Strategy:

1. The State of Iowa should be commended for taking action to ensure that science-based nutrient standards are adopted within the state; and for proposing an approach for point sources that appropriately balances the cost with the benefit. The draft Strategy for the first time merges point sources and non-point sources into a single environmental strategy, and the State is to be applauded for doing so. We also appreciate that the strategy was developed specifically to fit within existing statutes without the need for additional rules or statutes; another area for which the State should be commended.

2. Municipal systems are already facing the combined impacts of changing stream designations, increased wet weather modifications, and aging infrastructure. Adding nutrient standards will be an exceptional increase to the burden of unfunded mandates forced upon local utilities. The ability of Iowa's sewer rate payers to continue to absorb large dollar increases is limited. The focus on point source nutrient reduction comes at an estimated \$1 billion in capital outlay by municipal wastewater systems that in many cases are already struggling to finance other infrastructure needs.

The City of Ames has just completed a long-range capital plan for its Water Pollution Control Facility; which in part, included a conceptual plan to modify the facility to achieve the nitrogen and phosphorus standards included in the Strategy. That evaluation yielded a cost estimate of \$22.4 million of capital costs (in 2012 dollars) plus an annual operating expense of \$1.4 million. To put the cost in perspective, the Ames Sewer Utility had annual revenues in FY 2011/12 of \$6.4 million. Implementation of the nutrient strategy will necessitate an estimated 55% sewer rate increase; 33% increase to cover the debt service, and an additional 22% increase to fund the annual operating and maintenance expense.

Before the state proceeds with enacting the point source nutrient reduction strategy as proposed, we recommend that the State affirmatively declare that nutrient reduction is the best possible use of these funds, and publicly acknowledge that the investment in nutrients may come at the expense of other improvements to the state's wastewater infrastructure. We also recommend that the efforts to secure funding for nutrient reduction projects be expanded in the Strategy document to include point sources as well as non-point sources.

3. We would like to express concern about the Strategy's ability to achieve the overall target for a 45% reduction in nitrogen and phosphorus loading. The strategy seems very heavily weighted towards addressing point sources through the imposition of mandatory limitations and timelines, while the non-point source approach relies entirely on voluntary implementation. Iowa's largest communities are going to spend an exceptional amount of money over the next 20 years to achieve a comparatively small reduction in the total nutrient loading to Iowa's rivers and streams. In comparison, it appears there is a substantial amount of money proposed to be spent on further research on the non-point sources, with very little assurance of any meaningful reduction in the much larger contribution of nutrients coming from non-point sources.

At the December 14 public meeting in Ames, a comment was made that for the non-point source community to achieve the targeted reductions will require a very high rate of adoption of a full suite of best management practices. The presenter went on to say, "This will not be easy, but is it not impossible. What was missing from the remarks was whether the State believes that it is \*reasonable\* to assume such a very high adoption rate for non-point sources without any mandatory requirements. The State clearly felt that relying on voluntary adoption by the point source community was not a viable approach, and it is counter-intuitive to assume that the non-point community would be more prone to voluntary adoption.

We noted wording in the draft Strategy that contemplates additional future tightening of nutrient standards for point source discharges. We have a concern that if the non point source strategy is not effective in achieving the targeted nutrient reductions, focus will again return to the point sources. We strongly believe that, once this strategy is adopted, no further future nutrient removal burden be placed on Iowa's wastewater agencies unless and until the non-point source community achieves the nutrient reductions set out in the draft Strategy.

4. As the strategy moves from a conceptual plan to real-world actions, we strongly urge the State to consider municipal stormwater discharges as a de minimus source for nutrient loadings. These are comparatively much smaller contributors, and would face an exorbitant expense to try to capture and control nutrients. A more cost-effective approach for municipal stormwater would be to legislatively grant cities

**Name** John Dunn, Director, City of Ames**City** Ames**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

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the local authority to regulate the application of fertilizer within their corporate limits.

5. The 10-year moratorium on imposing more stringent nutrient limitations once a point source constructs its Biological Nutrient Removal (BNR) system is an important element of the proposed strategy, and absolutely needs to be a part of the final point source approach. Because of the cost of achieving these standards, most communities will need to utilize some form of debt financing to afford the capital improvements. The typical term for revenue abated General Obligation bonds is 12 years, and the term for a Clean Water State Revolving Fund loan is 20 years. Utilities need an opportunity to pay off their initial investment before being forced to take on additional debt. In its comment letter dated January 9, 2013, US EPA recommends that an exception to the moratorium be included in the strategy. The issue of federal deference to the Iowa moratorium is still unresolved, and we would encourage the State to continue to zealously preserve the State's right in conversations with the US EPA.

6. During informal conversations with our consultants, an Iowa DNR staff person suggested that communities like Ames that have proactively evaluated the impact of nutrient removal improvements could be placed on an accelerated construction schedule, simply because they won't require as much time to evaluate necessary improvements. We believe quite strongly that there should be no penalty for communities like Ames who have started their evaluation into nutrient reduction alternatives ahead of the mandatory timelines proposed in the strategy. To do so would send a message to communities that your best strategy is to drag your feet for as long as possible, which is counter to the goals of environmental protection and water quality improvement.

7. The US EPA raised concerns in its comment letter that the approach being recommended by Iowa does not reflect EPA's current thinking about numeric criteria development and implementation. This is concerning because it raises the specter of a utility spending millions to comply with a state requirement, only to have an even more stringent federal requirement imposed soon thereafter. We urge the State to work with stakeholders and the US EPA to confirm a nutrient reduction strategy that is acceptable to EPA before any facility undertakes such an exceptional capital investment.

With the above qualifications we offer our support for the proposed plan. Thank you for the opportunity to provide our comments and observations. We look forward to an opportunity for additional discussions as the strategy moves forward.

John R. Dunn, PE, MBA

Director, Water and Pollution Control Department

City of Ames

515-239-5150

jdunn@cityofames.org

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1152.

Timestamp 1/18/2013 9:50 AM

Name Jeffrey Hinnah

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Jeff and I as farmers encourage you to please continue with a voluntary approach of conservation practices that are knowledgeable and innovative for solutions to reduce nutrient flow without affecting Iowa's economy and agricultural production. As Iowa farmers we have a strong history of good conservation practices and are doing many currently. And who best knows what works on Iowa's soil and unique landscape then farmers. We know you already agree with us on this point.

But what we do need your support on is to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. There can be no delay in Iowa taking control of this situation before the federal government does! Jeffrey Hinnah

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1153**.

**Timestamp** 1/18/2013 9:51 AM

**Name** Aaron Mefferd

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I believe that the farmers are trying to do their best to try and limit the nutrient runoff. Some are taking conservation methods, while others are using variable rate for fertilizer usage to not over do it on areas that don't need as much as others. Some farmers are leaving more trash on the ground to help filter the water and nutrients to stay in the ground and not get into the ground water. We don't believe that the state needs to come in with more regulations as today's farmers are trying their best with different tactics to reduce the amount of nutrient runoff as they can.

The American farmer is aware of what needs to be done and is trying their best to help solve the situation. Aaron Mefferd

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1154**.

**Timestamp** 1/18/2013 9:52 AM

**Name** LaVerne Neal

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I would like to express my support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation programs. LaVerne Neal



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1155.

Timestamp 1/18/2013 9:55 AM

**Name** Jerry Peckumn

**City** Jefferson

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Iowa rivers are badly polluted from runoff and the drainage tiles. Much could be done with better nutrient management, tillage management, and targeting funding to permanent perennial cover on fragile parts of the landscape. Better protection of green belts and in stream restoration would also help. Relying on voluntary conservation has not helped, we must hold the source of pollution accountable. There has to be some standards that must be met and bad practices stopped.

The EPA should be involved managing Iowa's water. Our goals should be rivers that are healthy for are life.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1156.

Timestamp 1/18/2013 10:02

**Name** Leroy Lippert

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I would urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost share programs.

Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. Leroy Lippert

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1157**.

**Timestamp** 1/18/2013 10:03

**Name** Ronald Davidson

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I have had a life long dream of farming the family farm and thankfully it is a reality. I would like to think that with science-based strategies for nutrient reduction that the future is as bright for my young children. Fully funding the Iowa Nutrient Reduction Strategy is a step closer to making that possible. Ronald Davidson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1158**.

**Timestamp** 1/18/2013 10:04

**Name** Erik Oberbroeckling

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

My family operates a row crop farm in Northeastern Iowa. I would like to encourage you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Along with that, I would like to see a science based reduction strategy that encourages voluntary conservation practices. Thanks for your consideration in this matter. Erik Oberbroeckling

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1159**.

**Timestamp** 1/18/2013 10:07

**Name** Kurt Alvine

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I urge you to make conservation a priority this session by adequately funding the states nutrient reduction strategy as well as the states other conservation cost share programs.

Thank you for all you do for Iowa. Kurt Alvine

**Name** Practical Farmers of Iowa**City** Ames**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

Practical Farmers of Iowa (PFI) has been a leader in farmers teaching farmers practical strategies to improve their financial security and environmental stewardship. Our farmer-to-farmer strategy works because we have an open, supportive and creative culture at our events, on our list serves and in our research and demonstration efforts.

Farmers coming to learn from PFI often commit to make a change, a change that might be uncomfortable and that definitely is not business as usual. Most farmers begin with on-farm research to learn how a new practice fits into their farming system. Then as they demonstrate change on their farms, they have the opportunity to share their changes with neighbors and other farmers. Iowans attending PFI events, including Farminars, in 2012 numbered more than 5,000. Nearly 2,000 pay their hard-earned dollars to be part of our organization.

There are 90,000 farmers in Iowa. The majority of these farmers are going to need market solutions, policy changes and more to meet the 45 percent nutrient reduction goal. The Strategy's authors need to take a hard look at the Science Assessment and realize that a corn and soybean duo-crop production system is inherently leaky. The Strategy's authors must commit to actually changing the duo-crop system so that it is less polluting. Do not rely on edge of field practices alone. To accomplish these landscape changes a mix of state policy changes, market solutions and much more will need to be used to change the cropping system.

The Strategy's authors need to take leadership and actually suggest goals, timelines and indicators of success based on the strategies they can employ. Below we have provided an example strategic plan with a goal, strategies, objectives and most importantly yearly work plans with measurable outcomes to ensure successful execution and accomplishment of the overall goal. We recommend that these types of activities be carried out because they work at changing the duo-crop system at the scale appropriate to achieve landscape-scale results. The Science Assessment confirms that these landscape level changes are critical to reach the 45 percent reduction goal. We recommend the Strategy's authors rework the current version of the Iowa Nutrient Reduction Strategy and emphasize strategic planning in the final draft. A final strategic plan should be given a comment period also so that the actual work to be conducted can be scrutinized by the public stakeholders.

Goal: Decrease Iowa's Nutrient Loading to the Gulf of Mexico 45% at the end of 2017

Strategy 1. Use the strong private/public ag sector relationship to create a market for small grains/perennial forages in Iowa

Objective 1. Current buyers (5) of corn and soybeans commit to modest increases in their purchases of Iowa grown small grains/perennial forages which become substitutes for corn and soybeans

Year 1. Make Trade Deals in Iowa---provide economic analysis resources to 5 end-users who commit to including small grains/perennial forages in their business model; Example: feed mills substitute small grains/perennial forages in the standard hog ration

Year 2. 1% of Iowa acres sold as small grains/perennial forages (In 2012 was 0.4%)

Year 3. 10% of Iowa acres sold as small grains/perennial forages

Year 4. Maintain 30% of landscape as small grains/perennial forages through mature markets

Strategy 2. Use creative incentives to increase acres of cover crops

Objective 1. Corn and soybean seed companies increase use of cover crops on seed production acres

Year 1. Create marketing materials for seed companies; Ex: □ Seed Company Q doesn't farm naked in Iowa anymore; by 2017 all our companies corn and soybean seed acres will be covered with cover crops.

Year 2. 5% coverage of seed acres with cover crops

Year 3. 25% coverage of seed acres with cover crops

Year 4. Maintain 50% of seed acres with cover crops

Strategy 3. Use tax policy changes to incentivize farmers growing third crops/cover crops/perennial forages

Objective 1. Landowners receive tax credits when adding a cover crop; greater tax credit when adding a third crop and even greater with perennial forages

Year 1. Work with 5 county supervisors to change tax incentives to reduce offsite soil erosion clean-up bills; use money for tax credits

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 2 of comment #1160.

Timestamp 1/18/2013 10:10

**Name** Practical Farmers of Iowa

**City** Ames

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

Year 2. Work with 10 new county supervisors

Year 3. Work with 25 new county supervisors

Year 4. Work with 40 new county supervisors

Strategy 4. Use tax policy changes to incentivize written farm-conservation management plans (including soil, water, and habitat components)

Objective 1. Landowners receive tax credits when developing a written conservation plan and implementing it; greater tax credit when adding perennial land cover (including cover crops)

Year 1. Work with 10 county conservation districts & county supervisors to create conservation tax law program rates

Year 2. Work with 25 county conservation districts & county supervisors...

Year 3. Work with 50 county conservation districts & county supervisors...

Year 4. Work with all county conservation districts & county supervisors...

Thank you for your consideration. We look forward to hearing back from you with reaction to our comments.

Thank you PFI Policy Committee and the Research and Policy Director,

Nathan Anderson

Rick Hartmann

Fred Kirschenmann

Jeff Klinge

Laura Krouse

Jerry Peckumn

Ann Robinson

Dan Specht

Francis Thicke

Sarah Carlson

Drake Larsen

Please note: These comments were submitted from the PFI Policy Committee and not the organization as a whole. Practical Farmers of Iowa includes a complete cross section of Iowa farmers—large and small, conventional and organic, two-year rotations and seven-year rotations, grass-based systems and more. It is highly likely PFI members not on the Policy Committee would have different opinions—we have encouraged all members to submit comments on their own.

Name John North
City Cedar Rapids
State Iowa

Providing comment on the following sections:

- Executive Summary
Nonpoint Source
Policy
Point Source

Iowa Association of Water Agencies

January 17, 2013

Dean Lemke
Iowa Department of Agriculture and Land Stewardship
Wallace Building
502 E. 9th Street
Des Moines, Iowa 50319

John Lawrence
Iowa State University
132 Curtiss
Ames, IA 50011

Adam Schnieders
Iowa Department of Natural Resources
Wallace Building
502 E. 9th Street
Des Moines, Iowa 50319

RE: Iowa Nutrient Reduction Strategy

Gentlemen:

This is to provide the Iowa Association of Water Agencies (IAWA) comments regarding the Iowa Nutrient Reduction Strategy (Strategy). IAWA's membership is comprised of municipal and rural drinking water utilities that serve a population of 10,000 or more. Collectively, our member utilities provide drinking water to approximately 1.2 million Iowans.

IAWA and its member utilities recognize both the need for and the benefits that will be realized with the reduction of nutrient loadings to Iowa waters. The targeted 45% reductions of nitrogen (N) and phosphorous (P), if achieved, will not only reduce nutrient loadings to the Gulf of Mexico but will also greatly enhance the quality of the state's water resources and their beneficial uses for all Iowans. Consequently, IAWA generally supports the Iowa Nutrient Reduction Strategy. Although supportive, IAWA does have some reservations and comments regarding the proposed Iowa Nutrient Reduction Strategy and its implementation.

IAWA commends and is generally supportive of the Strategy based on the following considerations:

- IAWA recognizes the need for and benefits to be realized from the implementation of the Iowa Nutrient Reduction Strategy. IAWA considers the Strategy to be a "small, first-step in the right direction" of enhancing and protecting Iowa's water resources.
The Strategy and accompanying documents provide a good overview of the nature and scope of the current nutrient loading challenges in Iowa as well as the challenges we will face in the efforts to achieve meaningful reductions from both point and non- point sources.
IAWA commends the stated commitment to develop an integrated plan that is based on sound science and attempts to incorporate factors such as best available technologies and cost-benefit analyses.

IAWA would also offer the following observations and concerns as well as suggestions that we believe will strengthen and facilitate a better understanding of the need and benefits of the Iowa Nutrient Reduction Strategy:

- IAWA notes that the Strategy document has just a few limited references to the local water quality benefits that will be realized with the reduction of nutrient loadings. We believe that the Strategy document should include additional discussion regarding enhanced water quality and its benefits for drinking water sources, recreational and aquatic habitats. The Strategy should stress that these "local" benefits will also provide an enhanced quality of life and economic benefits to all Iowans. IAWA offers to provide a representative to serve on the Science Advisory Panel or other stakeholder group organized for future discussions, establishing goals and setting timelines.
Based on the contribution of nutrients, the Iowa Nutrient Reduction Strategy would appear to require point sources (large municipal and industrial NPDES holders) to provide a disproportionate percentage of the stated nutrient reduction goals. The targeted reductions goals are fairly explicit and will be extremely expensive to achieve. These costs will be borne directly by the municipal utility rate payers and the affected industries. We believe the Strategy should more fully recognize the burden that will be borne by industrial and municipal point sources.
Similarly, the Iowa Nutrient Reduction Strategy is somewhat vague regarding the extent of the nutrient loading reductions needed to be achieved by non-point sources and the proposed plan of action in the event that the proposed voluntary actions fail to achieve the targeted reductions.
Per the Strategy document, the current respective contribution by point and non-point sources of nutrient loadings to Iowa waters is as follows:

Nitrogen Phosphorus



# Iowa Nutrient Reduction Strategy

Online comment submissions

Timestamp 1/18/2013 10:11

**Name** John North  
**City** Cedar Rapids  
**State** Iowa

Providing comment on the following sections:

<input checked="" type="checkbox"/> Executive Summary	<input checked="" type="checkbox"/> Nonpoint Source
<input checked="" type="checkbox"/> Policy	<input checked="" type="checkbox"/> Point Source

Estimated Total Tons per Year-All Sources 275,000 tons/yr 13,563 Tons/Yr  
Point Sources (Municipal and Industrial) 8% 20%  
Non-Point (Agriculture) 92% 80%

\*\*\*\*\*

The document also indicates that full implementation of the Strategy will achieve the following approximate reductions of the nutrient loadings from point sources:

Point Sources Contribution	Current	Targeted	Projected	Overall Reduction
Nitrogen	8%	66.7%	5.4%	
Phosphorus	20%	75.0%	15%	

\*\*\*\*\*

The above exercise illustrates that targeted reduction goals for point sources would only provide a small percentage of the overall 45% reduction goals for both nitrogen and phosphorous. In fact, elimination of all nutrient loadings from point sources would only provide for an overall reduction of 8% for nitrogen and 20% for phosphorous. The math and economics of the nutrient loadings dictate that the preponderance of the needed reductions to fill "the gap" will have to come from non-point sources. Unfortunately, the Strategy document does not fully address the mechanisms or timelines for achieving the reductions needed from non-point sources.

We hope that these comments and suggestions will be helpful. Thank you for your consideration.

Sincerely,

(Unable to insert electronic signature)  
Signed copies will be sent to all recipients

John North  
Executive Director, on Behalf of the Board of Directors  
Iowa Association of Water Agencies

Cc: IAWA Board of Directors and Member Utilities

Mr. Chuck Gipp, Director,  
Iowa Department of Natural Resources

Mr. Bill Northey, Secretary of Agriculture  
Iowa Department of Agriculture and Land Stewardship

Iowa Association of Water Agencies  
2201 George Flagg Parkway, Des Moines, Iowa 50321  
319-377-3104 jnorth7304@aol.com

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1162.

Timestamp 1/18/2013 10:11

**Name** Rose Danaher

**City** Homestead

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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First of all, I would like to commend the nutrient reduction strategy partners for their hard work to improve water quality for Iowans and our downstream neighbors. I believe the strategy is an excellent start and something that will be beneficial to all Iowans.

I think there should be a greater discussion about voluntary conservation practices for Iowa farmers and how effective they are. Today's programs have a lot of success and there are good things happening on Iowa farms every day, but they aren't all inclusive and they haven't been enough to prevent bacteria contamination and extreme soil and nutrient losses. The strategy seems to infer that Iowa agriculture will make widespread changes in cropping practices as a result of the new plan. This hasn't happened in the past, and I can't see the changes being made on the land because it was put on a piece of paper. How are we going to reach out to the landowners and get these reductions accomplished?

I would like to see the strategy have a greater focus on watershed-based projects, which is a proven plan that works. In smaller watersheds (HUC12), conservation practices and water monitoring can be targeted to show reductions. We can learn from this. Are the models correct? Do these practices really have a significant impact on water quality? These are questions we need to answer, but the only way to do it is to get more practices on the ground and monitor (quantify!) the changes in water quality.

In the plan I saw only one reference to the potential impacts of failing or non-existing rural septic systems. Some county sanitarians have estimated that 50% or more of rural septic systems are not up to code and have an impact on local water quality. While not a truly non-point source problem, it usually gets thrown into NPS planning and should be addressed.

Education for landowners, homeowners and citizens who drink, play, farm and live alongside Iowa's waterways is essential. Each surface intake, waterway, old basement or barn drain, and storm sewer is a straight pipe for pollutants to enter our streams and rivers. Without further education on the impacts to water quality, I'm afraid we won't see the improvements that we hope for.

Thank you for taking the time to consider my comments, I hope the revised proposal will address some of these issues in depth and come up with a concrete and implementable plan to improve Iowa's water quality.

**Name** Tom Hebert, transmitting on behalf of**City** Washington**State** District of Columbia**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input checked="" type="checkbox"/>	<b>Point Source</b>

January 18, 2013

The Honorable Bill Northey, Secretary

Iowa Department of Agriculture

c/o

Nutrient Reduction Strategy

ANR Program Services

2101 Agronomy Hall

Ames, Iowa 50011-1010.

Re: Comments on the Draft Iowa Nutrient Reduction Strategy

Dear Secretary Northey,

The undersigned national and state agricultural organizations and businesses strongly support profitable, sound and effective nutrient management that successfully protects ground and surface water quality. We are committed to applying the best possible science and economics to the goal of achieving optimal production and nutrient use efficiencies while meeting environmental needs and responsibilities. We find the draft Iowa Nutrient Reduction Strategy (Strategy) to be perhaps the most comprehensive state effort ever to address the complicated interplay of the multiple challenges that must be addressed to achieve this goal. The undersigned also are strong supporters of state-led efforts to protect water quality by working with agriculture and municipal and industrial dischargers. It is only at the state level and below where the full and proper range of considerations and understanding can be brought to bear to create sustainable and effective programs. We commend Iowa for fully stepping up to this challenge. We welcome and appreciate this chance to offer these comments.

We strongly support the basic premise of the Strategy: water quality and nutrient load reduction goals must be pursued in the context of the best scientific, technical and economic considerations possible. Only then can we be confident that we are pursuing achievable and practical objectives. The fact is, as this Strategy demonstrates, major agricultural nutrient load reductions and significant water quality improvements can be achieved in Iowa. But these reductions and improvements are most definitely not unlimited, something that the Strategy also clearly demonstrates. Farmers and ranchers can embrace strategies that set aggressive goals and require significant changes in the way they operate or in how their operations affect the landscape. But this is only possible if these strategies are fully grounded in good science and economics that dictate achievable goals and with clear evidence that practical, reasonable work and sacrifices will actually help the environment. We strongly encourage Iowa to continue to rely on this basic premise to guide its subsequent efforts to finalize and then implement this strategy.

We also believe that a major strength of the Strategy is that it was developed through a "bottom-up" rather than "top-down" approach and reflects an extensive dialogue between the agricultural and municipal wastewater interests. This approach should help Iowa avoid counterproductive and fruitless finger pointing and will allow the state and these parties to get down to the hard and practical work of pursuing achievable nutrient load reductions that can really help water quality.

The undersigned organizations have come to the conclusion that, in the case of agriculture, achieving the goals and objectives outlined above will involve efforts under three broad categories of nutrient management: increasing and optimizing nutrient use efficiency on farms and ranches in the crop production season, retaining nutrients on farms and ranches that are not used in a growing season, and capturing those nutrients that do leave the farm through the use of green infrastructure downstream. We note that the Strategy clearly recognizes the role and importance of measures in all three of these categories and support the Strategy's work to properly understand their benefits and costs.

The Strategy briefly addresses important gaps in data and research that made it necessary for the scientists and economists involved to adopt certain critical assumptions to allow analytical conclusions to be reached. We wish to emphasize that there is a considerable body of knowledge regarding nutrient management practices capable of increasing nutrient use efficiencies without sacrificing yields and that these studies have important implications for the load reductions possible through incorporating suites of these practices into an on-farm nutrient management system. We encourage you to build on your existing scientific analysis to consider additional available nutrient management

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 2 of comment #1163.

Timestamp 1/18/2013 10:13

**Name** Tom Hebert, transmitting on behalf of

**City** Washington

**State** District of Columbia

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input checked="" type="checkbox"/>	<b>Point Source</b>

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practices. The final Strategy should include further discussion of these existing data gaps, their implications for additional nutrient loss reductions, and identification of needed research. We are ready to work with you to assemble the best science and adaptive approaches so that you could review the science and take it into account in the final Strategy. We believe advancing nutrient efficiencies without sacrificing yields should be prominently incorporated in the final assessment and implementation plans.

Thank you once again for this opportunity to comment on the Strategy. As we state above, the Strategy is among the most authoritative state efforts ever to comprehensively identify and chart a responsible and achievable course of action that will substantially reduce nutrient loads and protect water quality. Clearly, an enormous amount of high quality effort has gone into its development. We look forward to Iowa's responsible and innovative use of this work to help farmers and ranchers profitably optimize nutrient use and management to protect water quality, and achieve optimal yields and harvests. This effort is fully consistent with and advances US agriculture's commitment to providing a growing world with the agricultural products they demand and need.

Sincerely,

Agricultural Retailers Association

American Farm Bureau Federation

CropLife America

GROWMARK

National Cattlemen's Beef Association

National Corn Growers Association

National Council of Farmer Cooperatives

National Pork Producers Council

National Turkey Federation

PotashCorp

The Fertilizer Institute

United Egg Producers

U.S. Poultry and Egg Association

Wyoming Ag Business Association

**Name** John Gotz**City** Ankeny**State** Iowa**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input checked="" type="checkbox"/>	<b>Point Source</b>

I have great issue with the idea throughout the document that voluntary compliance is going to solve our problems in both point source and nonpoint source pollution. There exist this great idea that the market is self correcting and all issues will eventually work themselves out if we only let them. That only works if the problem is a cost to business in the first place. Businesses in America has always found a way to exploit the environment for their own purposes and leave the cost of reconstruction and cleanup to the public sector. So as long as there is no significant cost to business there is no concern to change their ways, no voluntary compliance. Altruism in business is only present if it yields significant profits to the bottom line.

History repeatedly shows us that business will take the path to greatest profit, ie Massey energy and the Upper Big Branch Mine, BP's Deep Water Horizon, Bernie Madhoff's ponzi scheme, The recent Housing Scandal. I could fill pages with examples but you get the point. Business does not take the path to the greatest good of the people and/or the environment.

The thought that somehow Iowa farmers are voluntarily going to reduce contaminant runoff from their farms is unrealistic. In This age of high crop prices farmers are plowing to the very edges of their fields; putting in more efficient drainage systems; taking out all unnecessary fence rows; clear cutting every plowable inch of land and some that are not so plowable; increasing the yield per acre by planting closer together and fertilizing heavier; planting back to back years with corn and fertilizing more. Ag support business fertilizing fields while strong winds scatter their spray over adjacent acreages and waterways. This increases pollutants into our waterways. If farmers were self policing we would not be having this conversation they would have already taken care of their own nonpoint pollution and not be doing what is listed above. Granted there are farmers who have cleaned up their pollution and they are to be commended, but they are the minority. I'm not trying to put the Iowa family farmer down, they have had a tough go of it, until ethanol drove prices up.

Government is the voice of the people, established to make sure the greatest good for the people is done. Nonpoint pollution is not getting better as we can see through the action of farmers already and is getting worse as Iowa's annual rainfall amounts drop as the decades march by. It will also get worse in the future as more countries seek food to feed their citizens, brought on by natural disasters from climate change. Farmers will try to plant even more to meet demands and maximize profits, making the pollution problem worse. It is time to rein in this problem, regulating runoff and enforce codes. No one wants more regulation but when the problem fails to fix itself it becomes necessary. The critique of capitalism is that it does not take into effect the cost to the environment and therefore will never create a corrective for the problem. Voluntary compliance does not work.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1165**.

**Timestamp** 1/18/2013 10:20

**Name** Thomas Jackson

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

conservation of our state soil and water resources has been and always will be of paramount importance on my farm. The amount of rainfall that falls from the sky cannot be controlled but the soil water runoff from my farm can be controled thru careful conservation and best management practices. Practices such as notill planting ,grass waterways, and terrace construction have helped keep soil in place and conserve water on my farm. But these measures cost money and need careful management to be sucesssful. A science based and voluntary farmer aproach are the best way to reach the most farms . A broad based and one size fits all approach to soil and water management would be extremely expensive and costly to the farmers and taxpayers of our great state. I urge you to carefully consider more funding for costshare and voluntary conservation management of our state's soil and and water resources, in my opinion it's the best approach. Thomas Jackson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1166**.

**Timestamp** 1/18/2013 10:23

**Name** Ann Hatfield Merritt

**City** Creston

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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"The nutrient reduction strategy needs to account for the unchecked growth of hog confinements - a significant nonpoint source of water pollution - or it will ultimately fail in making any

significant progress in reducing nitrates in our water." These hog confinements pollute the air, pollute the water, and cause poverty in our rural communities. The stench is everywhere.

**Name** John Hall Hall & Associates**City** Washington**State** District of Columbia**Providing comment on the following sections:**

<input type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input checked="" type="checkbox"/>	<b>Point Source</b>

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WASHINGTON, DC 20006

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Web site: <http://www.hall-associates.com>  
E-mail: [jhall@hall-associates.com](mailto:jhall@hall-associates.com)

January 18, 2013  
Nutrient Reduction Strategy  
ANR Program Services  
2101 Agronomy Hall  
Ames, IA 50011-1010

RE: Comments on Proposed Iowa Nutrient Reduction Strategy

Dear Sir or Madam:

The following comments are submitted on behalf of the City of Council Bluffs and the Des Moines Metropolitan Wastewater Reclamation Authority.

Due to concerns, in particular, over the need to lower nutrient levels contributing to Gulf of Mexico hypoxia and make progress on addressing nutrient levels for in-state waters, DNR, in conjunction with others, developed the above referenced point and non-point nutrient load control strategy. The draft policy is premised on the assumption that Iowa will use a technology-based approach to initially reduce nutrient loadings from most municipal point sources and later adopt site-specific numeric nutrient criteria to protect state waters. Moreover, the ultimate water quality issues regarding impacts of TN and TP will be assessed over time under an "adaptive management" approach.

#### Federal Regulatory Issues Require Resolution Prior to Strategy Adoption

While our various organizations are supportive of developing an Iowa nutrient load control strategy that results in fairly apportioning responsibility for Gulf related impacts and begins progress on addressing in-state nutrient issues in a cost-effective and sustainable manner, we have a number of serious concerns associated with resolving the federal-state interface for this policy. In particular, the intended results of the state's proposal can only work if they are deemed consistent with and sufficient to meet compliance requirements under the Clean Water Act. The strategy presumes it is appropriate to set technology-based requirements for nutrients, as a federal requirement for pollutants "not regulated" under an applicable effluent guideline (in this case secondary treatment). As discussed below, it is not apparent that this position is correct (federal law regulates "secondary treatment" which does not include nutrient removal) or that EPA will defer any more restrictive requirements it deems necessary at the time of permitting.

The success of the proposed strategy is dependent on its legal sufficiency at the time of permitting. Moreover, the cost-effectiveness of the approach is dependent on (1) control of the nutrient that is actually limiting plant growth and (2) ensuring that facilities not causing or significantly contributing to excessive plant growth in downstream waters are not unduly regulated. However, in the past year, EPA has informed other states and permittees that:

1. Adaptive management is not an acceptable substitute for the immediate imposition of stringent nutrient reduction requirements if downstream waters are considered nutrient impaired. (See, EPA Region I permitting of nutrient requirements for the Great Bay Estuary that rejected "adaptive management," despite admitted uncertainties on the impact of point sources on the system and setting "limits of technology" for TN reduction, even though the municipal impact on algal growth was negligible – final/draft permits and statements of bases for Exeter, Newmarket and Dover, NH may be found on the EPA's website at – [http://www.epa.gov/region1/npdes/permits\\_listing\\_nh.html](http://www.epa.gov/region1/npdes/permits_listing_nh.html)).
2. Federal law does not require the adoption of nutrient technology-based limits for municipalities. (See, e.g., EPA's recent response denying the petition for rulemaking from NRDC seeking such action on a federal level which indicated that nutrient reduction requirements must be water quality based - attached). This the state and federal "authority" for imposing case by case technology-based limitations is inapplicable. Such requirements must be based, if at all, on water quality-based authority.
3. States that fail to adopt nutrient criteria must implement nutrient limits at the time of permitting using a state's existing narrative standard; technology-based approaches will not be deemed sufficient to comply with the Act (See, e.g., EPA letters to Colorado, Illinois and actions of EPA Region I in Massachusetts and New Hampshire; EPA response to Congressman Coffman – dated July 24, 2012 - attached)

The recent comments filed by EPA Region VII verify that these are issues that must be addressed to avoid duplicative and wasteful municipal expenditures. For example, EPA has indicated that while the agency "applauds" DNR for engaging in the study as a "great start," EPA recommends that a more restrictive approach be taken to setting technology-based limits, that no schedules of compliance be allowed and that there will be exceptions to the 10 year moratorium if "water quality-based" limits are set. (EPA comments at 3) Following this advice would negate the basic purpose of the DNR strategy and place municipal entities at risk for far more restrictive limitations. More importantly, EPA indicates that the Iowa strategy does not reflect EPA's latest thinking about numeric criteria development and implementation. While it is uncertain precisely what EPA means by this statement, it is certainly possible that EPA will press for statewide criteria to be developed using methods employed in other states (e.g., EPA in Florida).

When a state has not adopted numeric criteria, EPA typically utilizes other approved criteria (including "Gold Book") as the basis for applying a state's narrative standard. We would note that recent EPA actions have proposed or approved stream nutrient criteria in the following ranges:

Colorado: TN ~ 2.1 mg/l; TP~0.11 mg/l



**Name** John Hall Hall & Associates**City** Washington**State** District of Columbia**Providing comment on the following sections:**

<input type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input checked="" type="checkbox"/>	<b>Point Source</b>

Florida: TN~ 1.7-0.7 mg/l; TP~0.46-0.06 mg/l  
Wisconsin: TN – not regulated; TP~ 0.07 mg/l

There is little doubt that broad based implementation of such standards in Iowa would put rivers and streams on the impaired waters list for decades to come, given the robust agricultural economy of the state. Such action would have severe economic ramifications for point source contributors because of EPA's insistence that such sources be stringently regulated, even if the point source controls will not produce any demonstrable ecological changes (see, e.g., Great Bay nitrogen limitations). Moreover, at the time of permitting EPA will point to actions approved in other states as an indication of proper narrative criteria interpretation. Id.

Given these well-known EPA positions, already being implemented in other states it is apparent the Iowa nutrient strategy needs to be amended (and expanded) to better conform to the federal program requirements or there will no assurances that radically different (and more restrictive) requirements will not be imposed at the time of permitting or that the ten year moratorium on more restrictive requirements will be respected by EPA. Moreover, based on EPA's comments, it is apparent that a central weakness of the strategy is that it is classifying the approach as a state/federal technology-based limitation, rather than a form of water quality-based limit intended to address, at a minimum, Gulf of Mexico concerns. Finally, since both TN and TP are being regulated pursuant to the draft policy, there will be an expectation that both pollutants need to be regulated to preclude in-state impacts from occurring. EPA's Rivers and Streams Nutrient Criteria development documents noted that such an approach is not a cost-effective way to address nutrient impairments, where they exist. A focus on the limiting nutrient, once identified, is typically sufficient to ensure excessive plant growth does not occur.

The group believes that the following issues need to be addressed to significantly improve the viability of this approach and make it more cost-effective:

- Fair apportionment of Gulf of Mexico point source load reduction responsibilities needs to be identified by DNR and approved by EPA. As point sources, in general, are about 8% of the "problem" (a very minor component), a specific state point source load reduction requirement should be identified so that the technology-based TN reduction goals may be implemented as necessary (and sufficient) to achieve the point source share. Once point source discharges are below this target, the remaining point source share should be considered "de minimus." This should prevent EPA from arbitrarily demanding a greater point source reduction at a later date (as has occurred in other watersheds – e.g., Chesapeake Bay).
- Setting GOM-based load targets and classifying the technology-based limits to water quality-based limits may resolve EPA concern regarding schedules of compliance since such schedules are clearly allowed for new water quality-based limitations.
- The policy should not set specific TN concentration levels to be achieved by all point sources, but, as noted above, set a statewide, point source load reduction target/allocation for Gulf of Mexico purposes, within which a range of limitations are considered. This will allow a point-point trading program and likely avoid construction at many facilities that are less than 3 MGD. This allows for Gulf of Mexico-related TN reductions to be focused on the most cost effective locations and could account for in state load losses prior to TN loads reaching the major tributaries (Des Moines, Mississippi and Missouri).
- Stormwater reductions from municipal and commercial entities should be specifically excluded by this policy. These loadings are extremely minor in comparison to agricultural sources and TN control, in particular, it's difficult and very expensive to obtain in stormwater. The cost per pound removed is expected to be prohibitive and therefore not be a good expenditure of municipal resources. (See attached graphic comparing stormwater cost reductions versus other sources) A single load cap would also allow municipal entities to make appropriate tradeoffs between stormwater versus POTW loads – the latter being far more cost effective to address, should EPA press this issue at a later date.
- For in-state nutrient impact considerations, DNR should specify that only the limiting nutrient will be addressed, which will be presumed to be TP unless information indicates otherwise. This is an approach that has been used by most other states, including Minnesota and Wisconsin. A 1 mg/l "preliminary" water quality-based limit could apply to streams identified as impaired, target absent other information sufficient to generate the final limit to be achieved.
- To address the concern over narrative criteria compliance at the time of permitting, DNR will have to develop some type of guidance to implement the existing narrative criteria at the time of permitting. Such guidance could identify the stressor-response "impairment" thresholds (e.g., chl a levels, secchi depth, minimum DO violations due to excessive algal swings) that will be used for narrative criteria implementation (that will control the application of the federal regulation at the time of permitting). This guidance would also be helpful in identifying waters that are considered nutrient impaired for future TMDL purposes.

Our group, in conjunction with other municipal stakeholders, would look forward to meeting with DNR to discuss how the proposed nutrient reduction strategy may be better tailored to meet federal program requirements and ensure that a cost-effective nutrient reduction program can be implemented in the near future.

Sincerely,  
/s/

John C. Hall

Enclosures

cc: Greg Reeder, Council Bluffs  
Royce Hammit, Des Moines WRA  
Adam Schnieders, DNR

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **3** of comment #**1167**.

**Timestamp** 1/18/2013 10:26

**Name** John Hall Hall & Associates

**City** Washington

**State** District of Columbia

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Attachment

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1168.

Timestamp 1/18/2013 10:27

**Name** Larry Happel

**City** Pella

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**  **Nonpoint Source**  
 **Policy**  **Point Source**

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Fertilizer runoff and other sources of water pollution have been recognized for some time. Yet there seems to be little urgency in the Iowa Nutrient Reduction Strategy. It is simply more of the same. Voluntary approaches have been tried for a generation, with only modest impact. There is no reason to believe that new forms of these same strategies will produce more dramatic results. Words like "voluntary" and "pragmatic" can perhaps best be translated as anything that won't cost polluters money. When weighing how much money should be required to implement mandatory aggressive strategies, perhaps one should ask how much money one would be willing to spend to ensure that a family member not develop cancer from a poisoned water supply. Iowans have been blessed with some of the most fertile and valuable resources on the planet. It is already immoral to not conserve the resources God has given us. It should also be illegal. The proposed Nutrient Reduction Strategy falls far short of what this crisis demands.

Thank you for the opportunity to comment and for taking the time to listen!

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1169.

Timestamp 1/18/2013 10:32

**Name** michele mckee

**City** fairfield

**State** iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Water and air are two of our basic elements in life that can't be manufactured or reproduced and will eventually be the basis of cultures which will survive or fade away. China is prime example of not enough water and polluted air and a huge population. Wars will eventually be fought over water. Big Ag and shortsighted thinking that pollution

problems and water shortages and destroyed ecosystems can be fixed "later" are selfish and

misguided. The time to act is NOW and that includes real regulation. Money penalties don't

fix the problem. Already in Fairfield, Ia we all drink bottled water or have RO systems in

our homes and restaurants because of polluted chemical runoffs from years of farmers' chemicals. Now we have CAFO's with more pollution. This is all for money with no thought to

life quality and largely unknown harm done in the future. How about protecting the people, not the profits?

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1170.

Timestamp 1/18/2013 10:33

**Name** Stuart C. Schmitz

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

January 18, 2013

Nutrient Reduction Strategy  
ANR Program Services  
2101 Agronomy Hall  
Ames, Iowa 50011-1010

RE: Iowa Nutrient Reduction Strategy – Comments from the Iowa Department of Public Health

Dear Sirs:

The Iowa Department of Public Health appreciates the opportunity to provide our comments regarding the Iowa Nutrient Reduction Strategy prepared by the Iowa Department of Agriculture and Land Stewardship, the Iowa Department of Natural Resources, and Iowa State University College of Agriculture and Life Sciences. Although the strategy was developed in response to the 2008 Gulf Hypoxia Action Plan, the Iowa Department of Public Health recognizes the important public health implications associated with implementation of the strategy – and, as a result, strongly support further development and implementation of the strategy.

Reducing the nutrient loading to streams, rivers, and lakes in Iowa will have positive health benefits for citizens of Iowa. The following are included in the health benefits of reducing nutrient loading to surface water in Iowa.

- A reduction in nitrogen loading will have positive benefits to both public and private drinking water supplies within Iowa by reducing human exposure to nitrates and nitrites.
- A reduction in nutrient loading is also anticipated to reduce the potential for the development of algal blooms in surface water bodies and the release of toxins from these blooms that can have adverse impacts to human and animal health.
- The methods employed in reducing nutrient loading will also help control sediment runoff into surface water which is anticipated to lower the levels of bacteria within streams and lakes that can cause adverse health impacts.

After a review of the nutrient reduction strategy, the Iowa Department of Public Health wishes to also provide the following comments. These comments have been discussed during several meetings of the Water Resource Coordinating Council, of which the Iowa Department of Public Health is a member, but the department wishes to state to also show our concern.

- One of the greatest needs of the nutrient reduction strategy is the development of the methodology to determine current nutrient loading levels and measurement of any progress in reduction of these levels. Subsequent drafts of the strategy need to address this methodology.
- The nutrient reduction strategy places a heavy burden upon the Water Resources Coordinating Council in the implementation of the recommendations of the strategy, including prioritization of watersheds, and the determination of watershed goals. The Iowa Department of Public Health recognizes with other members of the Water Resources Coordinating Council that these activities need to be taking a priority in the activities of the council. As has been discussed in meetings of the Water Resources Coordinating Council, the Iowa Department of Public Health emphasizes the importance of having broad involvement from the Council members in commenting on the prioritization of watersheds and goals for these priority watersheds.

Thank you for the opportunity to provide these comments.

Sincerely,

Stuart C. Schmitz, M.S., P.E.  
Environmental Toxicologist  
Environmental Health Division

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1171.

Timestamp 1/18/2013 10:38

**Name** Norman Van Zante

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Because this seems very straight-forward, I assume we can count on your support for maintaining a voluntary program. That has worked well in the past, and the last thing farmers need is more federal legislation. We understand the importance of caring for the environment and will do it in a responsible manner supported by the State of Iowa. Your support will be appreciated. Norman Van Zante

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1172**.

**Timestamp** 1/18/2013 10:38

**Name** Michael Hejlik

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Please support the IDALS and DNR science based conservation plan. Farmers working with Iowa State University, IDALS, and DNR is the logical approach to implement conservation practices, both proven practices and experimental practices. The state needs to fund cost-share programs and conservation in general, in order to gain positive results and to share those results with all of agriculture. Michael Hejlik

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1173**.

**Timestamp** 1/18/2013 10:38

**Name** Kevin M. Griggs

**City** Boone

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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As chairman of the Boone Soil and Water Conservation District, I offer the following comments regarding the Iowa Nutrient Reduction Strategy.

The efforts to study and understand the problems associated with nutrient pollution in Iowa's waterways is greatly appreciated. There is no doubt that a sincere and genuine effort has been made to solve and reverse the state's water quality issues.

While I find the Iowa Nutrient Reduction Strategy generally informative and accurate, I believe it lacks two vital components that will ultimately affect its success. First is a system of numerical criteria for goal setting and measuring actual pollutant levels. The second is more controversial but absolutely necessary. Iowa must incorporate an enforcement system that effectively holds polluters accountable for their actions. We've long tried a complex incentive-based system of conservation, but with only limited success. Meaningful improvement will require an enforcement effort.

I hope all involved with the Strategy will reconsider these two deficiencies and amend the document accordingly.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1174**.

**Timestamp** 1/18/2013 10:41

**Name** Steven Pierce

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I was reading about the voluntary nutrient reduction strategy and am greatly in favor of it. I believe that funding would be very well spent on this and other conservation programs rather than mandates. A blanket set of mandates are never a good idea because every farm and situation is different. A farm that has a creek running through it would have a greatly different strategy than one that is 6 miles from the nearest stream.

The thought of government mandates scare me because this could mean that officials who don't know the factors that affect each piece of land, such as soil type, ground slope, and many others. Using scientific research and smart practices this problem will be well on its way to being solved. Funding these beneficial programs is definitely the way to go rather than through government mandates. Steven Pierce

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1175.

Timestamp 1/18/2013 10:53

Name Bob Wells

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

This response is in support of a voluntary, sensible, science based nutrient reduction strategy for Iowa. This type of strategy will allow Iowa's producers to respond on a farm by farm basis and implement those conservation practices best suited to meet the overall objective of a particular farm and contribute to the programs overall success.

Most Iowa producers follow good conservation practices and enhance the value of their farm land by implementing and participating in programs that have the overall goal of reducing soil and nutrient runoff into our streams and rivers. As producers make these individual commitments to reducing soil erosion and nutrient run off, it should become a priority of Iowa citizens and their elected representatives, to fully fund those cost share practices that contribute to the overall good of the state.

All Iowa citizens will benefit through better funding of these programs, especially when a program benefit could be a reduction in municipal and rural water treatment cost. Bob Wells

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1176**.

**Timestamp** 1/18/2013 10:55

**Name** Tom Oswald

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

Considering the importance to all Iowans that we maintain both economically and environmentally sustainable agriculture, I urge you to fund and support the Nutrient Reduction Strategy.

No doubt, pro-actively dealing with the issue of nutrient management in state is better than heavy regulation from Washington D.C. Tom Oswald

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1177.

Timestamp 1/18/2013 10:58

Name Jerry Anderson

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I am asking for your support of a science based nutrient reduction strategy that is also based on voluntary participation.

I have the best vantage point to determine which additional conservation practices that will work in my operation. My main focus is keeping soil in my field. Keeping soil and the nutrients attached where it belongs is the key to improved water quality. My goal for soil loss has been and will remain zero. With the continued use of rational grazing, maintenance of waterways and proper placement of filter strips I will get closer to this goal.

Farmers across this state share my views and will implement additional practices as they fully understand retention of one their most valuable assets- soil is critical. A Nutrient Reduction Strategy that is adequately funded along with improved funding of conservation cost share dollars will greatly help with water quality improvement through additional conservation projects. Matching a tax payer dollar with that of a farmer would be wise investment for our citizens, environment and our world.

I am asking for your continued support on this important matter and I appreciate your efforts for those individuals you represent.

Sincerely,

Jerry Anderson

. Jerry Anderson

Name Angie Carter

City Ames

State Iowa

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input checked="" type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

At the public information meeting on Dec 19th in Ames, IA, Gipp encouraged Iowans to all do more and acknowledge that we each share responsibility for Iowa's water. While this is true--we each could do more to conserve and improve water quality, and it is a responsibility of every citizen--there is a gross power imbalance in our state's approach to improving Iowa's impaired waterways. The most nutrient loading, or let's call it what it is--pollution, to our water comes from agricultural practices that encourage erosion and run-off on our farmland.

Our water quality will not improve without the state of Iowa taking responsibility for meaningful and measurable conservation practices. Iowans do not all share an equal burden or responsibility for improving water quality. This must be facilitated by increased state funding to support cost-share programs and their administration, as well as a strategic outreach plan that uses the best social science research. In addition, voluntary compliance must be abandoned as our fallback approach to environmental improvements. This has not worked, not ever, and surely won't work with limited funding, staff, and lack of social science. We need people on the ground to work with landowners and farmers in addition to people in policy to create changes that not only encourage, but require conservation.

This plan lacks the needed science, funding, and approach to consider clean water as a public good, something all Iowans should be able to access and expect from our state. This plan seems to expect farmers themselves, as individuals, to engage in needed changes in order to improve water quality in IA for all. This is an undue burden and a failure of our state to assume its role in ensuring clean water for all. That the state has failed to create policies, staff, and quality improvements, or to fund needed programs and staff to engage in research, outreach, compliance, and regulation of our water, shows gross neglect.

One of the strategy's contributors stated at the Dec 19 public meeting in Ames that a cultural shift is needed to successfully engage Iowans in adopting the needed water quality improvements and conservation practices. We agree that such a cultural shift is paramount to change. However, the proposed strategy lacks the means for such a culture of conservation to take root. The strategy, as currently outlined, includes hypothetical adoption rates of conservation practices through voluntary compliance, yet the research team lacks adequate input from the field of social science and farmers themselves that would validate these scenarios.

The plan mentions a suite of practices that somehow farmers are expected to adopt. Magic? Divine intervention? Social science would be an appropriate tool for creating recommendations for needed behavioral changes in agricultural practices, yet this plan lacks any mention of social science. In fact, there is one economist on the research team but no other social scientists. In a state where there are key agency, university, and non-profit stakeholders engaging in active changes on the ground on a watershed scale, why was this knowledge not applied to this plan? For example, citizen stakeholder groups and the IDNR are engaging in watershed scale conservation in the Cedar-Iowa River Valleys. Might this work not be a model for change? These voices are absent from this plan. If this plan is meant to be a means for our state to make big, landscape scale changes, we need social scientists and the examples of real-life scenarios working in our state. What lessons have been learned from these and how can they be applied? Use of this current participatory conservation research would offer real-life examples of what the nutrient strategy plan lacks--a diversity of voices and perspectives--including farmers participating in field trials and voluntary conservation, non-profits developing extensive networks of public-private collaboration to address environmental concerns, and diverse stakeholders engaging in targeted projects creating watershed scale-improvements.

Still, it is not enough to rely on farmers and limited conservation agency staff to ensure water quality improvements. If it were, then these changes would have already taken place. It's not for want of information or money that farmers are not making needed conservation changes. Many of the large-scale farmers have money enough this year to make improvements and most farmers are already associated with networks and organizations that share conservation information. The state must fund both conservation practices and increased natural resource management staff to ensure adoption and compliance. This increased funding from the state will support Iowa in realistically achieving meaningful non-point source pollution reduction, despite current agricultural practices driven by high crop prices.

Further, the strategy calls for additional agricultural conservation outreach and resources, but an awareness campaign is not enough to change the economic realities faced by farmers. Wetlands are mentioned as a specific practice to help us reach our water quality goals, yet the CREP wetlands team is very small and lacks the staff capacity and funding to engage the needed acres in what would make impactful changes. Other wetlands are not popular in IA--in fact, with the current corn prices, farmers are draining and taking acres out of federal farm programs at an increasing rate to compete with the markets. The state seems out of touch with the reality of our current farming practices.

Finally, the strategy assumes that there is a way to do even more with currently limited financial resources allocated to support conservation. At the rate that confinements are being proposed and built, and that conservation acres are being removed from federal farm programs, how are 11 or 13 more staff supposed to be enough to create the needed materials and outreach, much less engage in the relationship building and networking needed for landscape level changes, or the regulation and compliance work that is needed to ensure the changes are maintained?

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 2 of comment #1178.

Timestamp 1/18/2013 10:58

**Name** Angie Carter

**City** Ames

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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**Name** Todd Ontl**City** Ames**State** Iowa**Providing comment on the following sections:**

<input type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input checked="" type="checkbox"/>	<b>Point Source</b>

The Iowa Nutrient Reduction Strategy aims to reduce nutrient inputs to the Gulf of Mexico by 45%. As the report states, the vast majority of these nutrients in flowing into Iowa's water come from agricultural (non-point) sources, whereas only a minor portion come from point sources such as municipal wastewater treatment plants (8% of nitrogen, 20% of phosphorus). As such, it stands to reason that any strategy that aims to effectively reduce nutrient inputs to Iowa's surface waters need to focus on new and aggressive approaches that lead to measurable reductions in non-point contributions to nutrient pollution. This approach necessitates solid goals in nutrient levels in order for improvements to water quality to be sustained over the long term.

The strategy summarizes research conducted at Iowa State University that shows the effectiveness of conservation practices currently in use by many of Iowa's farmers in reducing nutrient contributions to local lakes and streams. These conservation practices are relatively simple and effective, an important consideration for implementing broadly across Iowa's extensive agricultural lands with limited state budgets. However, in order to have significant reductions in nutrient concentrations in our waters, many more farmers would to implement these practices across much greater proportions of our state's agricultural landscapes.

Simply stated, the path forward to an effective nutrient reduction strategy for the state hinges on the widespread adoption of conservation practices by Iowa's farmers. The current plan fails to present any meaningful approach to doing so. The strategy presented represents a continuation of the current voluntary implementation approach, an approach which has been unsuccessful in improving the state's water quality and reducing our contributions to the problem of Gulf of Mexico hypoxia. Furthermore, the strategy does not set any goals for water quality improvements to even achieve. Solid limits for nitrogen and phosphorus concentrations in Iowa's surface waters must be determined in order to provide metrics for achieving nutrient reduction that are meaningful and can be sustained. In order to achieve the goals of improving water quality, we need to go beyond crossing our fingers and hoping farmers "do the right thing" for our lands and waters. The document does not outline any actionable plan for widespread adoption of conservation practices. At a minimum, we need to provide funding to state programs that help farmers to implement these practices, and staff the agencies and programs that ensure compliance if state or federal funds are to be use in cost-share approaches. In order for a plan to have substantive impacts on water quality, it should provide:

- support for programs identifying high-potential source areas for nutrient run-off for targeting conservation practices
- tax credits for landowners who are exceptional stewards of the land
- support for practices such as cover crops and extended crop rotations that reduce fertilizer inputs
- required minimum-width riparian buffers along all waterways
- full funding of all existing water quality programs (Iowa Water and Legacy Fund, REAP)
- additional programs to fund wetland restoration and construction for nutrient removal

In order to be successful, a nutrient reduction plan must have at minimum two components: 1) meaningful targets for water quality improvements, and 2) an actual strategy for enabling Iowa's farmers to adopt the conservation practices we already know are effective for solving the problem.

Sincerely,  
Todd A Ontl  
Ames, IA

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1180**.

**Timestamp** 1/18/2013 11:11

**Name** Jon McClure

**City**

**State**

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

I am writing you today in regards to the Nutrient Reduction Strategy. I believe that a science-based state nutrient reduction strategy that recognizes voluntary conservation practices and need to maintain agricultural production will be the best fit for your state.

I would urge you to adequately fund this strategy as well as the other conservation cost-share programs. Failure to fund these programs have delayed projects in the past and will delay needed conservation projects in the future.

We as farmers know what projects work on our farms. A voluntary based approach is the best way to encourage conservation practices and improvements to our land to provide the greatest benefit for our water quality in the state. Jon McClure



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1181.

Timestamp 1/18/2013 11:11

Name Chuck Walters

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I am writing in support of the Iowa Nutrient Reduction Strategy. The strategy is based on science and technology that is sound for my land and my business. It will enable us to use the conservation practices best adapted for my farming operation and the land.

There is not a "one size fits all" conservation program that can work for prairie potholes, timber soils, high production soils in Grundy county, hills of southern lowan, or for river bottom grounds that make up the Iowa landscape. Farmers know and understand this; we want to save our soils, improve water quality, and improve the overall environment while making a living off the land. We use the research provided from the scientists in this state and support the programs that help farmers incorporate the conservation practices that work for our state. This research is what the Strategy is based on. By funding the Iowa Nutrient Reduction Strategy and other conservation practices, farmers will continue to VOLUNTARILY adapt sound conservation practices, without have to create regulations to FORCE people to do the same practices.

As a farmer and a landowner, I care about Iowa's land and environment. It is not only where I am raising my children; it is a great part of the legacy that I can leave to my children. Not only do I want the best for my children, I want to only to do the best for the land that I have as well. Programs like the strategy will allow me to continue to save the soil while improving the water quality throughout the state. That is why I feel that supporting the Strategy is the right step for Iowa. Chuck Walters

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1182.

Timestamp 1/18/2013 11:11

**Name** Catherine Scott

**City** Ames

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**  **Nonpoint Source**  
 **Policy**  **Point Source**

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Transparency is important in the implementation of the strategy and the sharing of data.

I would suggest cooperation on a watershed basis to reduce nutrients. Everyone taking small steps together in an environment of cooperation could have a large impact. One idea is to have a competition among watersheds to see which one can make the biggest reduction. This idea was used in communities in Kansas to reduce electric consumption. Alliances between recreational water users and farmers could be helpful.

Quantitative data is a must. Current levels and any reduction by methods tried needs to be shared. A computer program could be developed to enter and evaluate data. Monitoring equipment should be made available. If certified crop advisers play a big role then give them more training and tools to make changes easier to do for farmers.

Market solutions were mentioned but I did not hear a good example of one. Would cost benefit ratios for different strategies be one?

Look for a large producer/owner for a demonstration project. Awards and recognition for nutrient reduction is a good idea.

If cover crops are removed by Roundup I am not in favor of that. If cover crops do not involve chemical spraying I think they have a lot of potential.

There needs to be a time limit on voluntary compliance. With good records and quantitative measures progress can be documented. If progress is nonexistent or too slow then compliance should be made mandatory.

I am concerned that so much money will need to be spent on point source reduction when that is a smaller part of the problem.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1183**.

**Timestamp** 1/18/2013 11:15

**Name** Robert Carmichael

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

Please fully fund the Iowa Nutrient Reduction Strategy.

The first in the nation strategy was developed by IDALS, IDNR and ISU in a scientific, reasonable and cost-effective manner. Under the plan, IDALS and IDNR will have specific areas of responsibility to reach ambitious nutrient reduction targets. This plan will help clean our water and reduce excess nutrients reaching the Gulf of Mexico.

The EPA has commended these agencies on their work and the science-based design. They believe this plan will yield measurable nutrient pollution reductions. Robert Carmichael

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1184**.

**Timestamp** 1/18/2013 11:16

**Name** Stephanie Dykshorn

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

As your constituents, I ask that you support measures to fund conservation cost-share programs, particularly the Iowa Nutrient Reduction Strategy. These programs directly affect many of the people you represent and many of us voluntarily implement conservation practices already. Please adequately fund INRS as it is science based and recognizes the practices we already, voluntarily do. Stephanie Dykshorn

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1185.

Timestamp 1/18/2013 11:24

**Name** Richard Dietz

**City** Ames

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                               **Point Source**

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I feel that this strategy falls short of what is needed to address major contributors to Iowa's poor water quality. This strategy fails to set specific goals for nutrient reduction, and timetables to achieve those goals. It fails to state how those who would choose not to participate would be held accountable.

If we're to achieve meaningful and measurable progress we cannot continue to rely on the voluntary adoption of practices that are known to reduce the pollution of our rivers and streams. If we expect to achieve the state goal of 45 % reduction there will need to be a high adoption rate of many different Nitrogen and Phosphorous reduction practices. There will need to be measurable goals, and tracking of progress towards those goals. Iowa will need to get serious and fund the conservation programs that are already in place, while considering the costs of doing nothing - and the benefits of measurable improvements. This will not happen, and has not happened, with voluntary compliance.

There does not have to be a "one size fits all" plan. We have the knowledge and technology to address the problem on all types of soils and landscapes - the sort of information that is contained in this assessment.

When the Clean Water Act became law, point sources were said to be contributing 85% of the pollution to our waters. Today nonpoint sources are considered to be contributing 85%. This change came about because of the implementation of standards, regulations and deadlines. It's time that farmers join other businesses, industries, and municipalities in helping to meet our water quality goals.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1186**.

**Timestamp** 1/18/2013 11:26

**Name** David Rock

**City**

**State**

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

I am writing to voice my support for the □ Iowa Nutrient Reduction Strategy . I believe that this is a reasonable approach to an issue that affects all lowans. I like that is voluntary as no two situations are the same. Solutions that work in one part of the state might not be practical in another. The voluntary part will allow us to implement practices that will work best on our individual farms. It is important that any plan we adopt be based on science and not on emotion.

Our farming operation is located in North Central Iowa and we do not have any rivers flowing through our property. All of the drainage ditches that run through our farms are back sloped away from the ditch; therefore we are not as concerned with water erosion as we are with wind erosion. To help stop this we have used reduced tillage for many years. We are constantly looking for practices that fit our operation that will allow us to reduce tillage even more.

I will conclude by urging you to adequately fund the □ Iowa nutrient Reduction Strategy plan and also to increase funding to close the remainder of the Ag drainage wells in North Central Iowa. David Rock

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1187**.

**Timestamp** 1/18/2013 11:33

**Name** Reagan Osborne

**City** Jefferson

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Policy**

**Nonpoint Source**

**Point Source**

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The nutrient reduction strategy needs to account for the unchecked growth of hog confinements - a significant nonpoint source of water pollution - or it will ultimately fail in making any significant progress in reducing nitrates in our water.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1188.

Timestamp 1/18/2013 11:40

Name Howard Anderson

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

Please support and adequately fund the Iowa Nutrient Reduction Strategy as well as the state's conservation cost-share programs. If we are going to continue producing high quality, high demand products such as corn, beans, and cattle, we need to take care of the God given land. State cost share money assists landowners in accomplishing more conservation practices with their same input. It lessens the burden of the landowner with a benefit of all Iowans.

On our family farm, I have implemented thousands of dollars worth of terraces conserving our ground. I utilized the cost share programs offered through the State allowing me to completely terrace the farm. I have a few projects in mind that need to be done and hope there will be cost share money in the future to ensure that I will be able to accomplish them fully and completely within in my budget.

Again, I ask that you adequately fund the Iowa Nutrient Reduction Strategy and the state's conservation cost-share programs to ensure timely completion of conservation practices. Howard Anderson



**Name** Veronica Lack**City** Iowa City**State** Iowa**Providing comment on the following sections:**

<input checked="" type="checkbox"/> Executive Summary	<input checked="" type="checkbox"/> Nonpoint Source
<input checked="" type="checkbox"/> Policy	<input checked="" type="checkbox"/> Point Source

By allowing Mitchell County Iowa's Point Source pollution to continue for some farmers others in Mitchell County had high animal loss numbers and the farmers and families downstream had to suffer the health effects and loss of life. This channeling of the huge swale area of and around Section 10 Cedar (W) Township to outlet directly down sinkholes is a travesty that continues to affect lives downstream. It also encourages the other unsustainable farmers to do the same when they see the new equipment and shops and houses the polluters are building and the Big Corn dollars fund the polluters purchase these pasture/wetland with no legal drainage outlet parcels. So now this is not the only on-going plume. But this plume is documented and is draining down through Floyd, Butler, and Bremer County. More wells are now affected in Mitchell County as in 2012 I received well test results on wells that were drilled at the IDNR suggestion in 2004 and they had to be drilled again to deeper aquifers after the 2008 floods.

Anhydrous Ammonia fertilizer is contaminating deeper and deeper aquifers in this one known and documented plume.

In February of 2007 I filed a Discrimination Charge #08-1022 on Farm Program Benefits against the USDA-NRCS for Mitchell County's NRCS's part in planning the illegal flood channels through lines of sinkholes and then illegally digging through my farm to dump down a line of sinkholes in a National Wetland. This ditching to sinkholes initially polluted the Upper 100 foot or so of the Cedar Valley Group Aquifers and all the wells using it downstream from Bradley Johnson's ditches to the sinkhole north of his and his dad's farmstead.

The IDNR took the side of the polluters in 1993 when I complained and withheld my well tests from me and is still suppressing the knowledge of this on-going pollution plume. Our government agencies decided to pay for the polluters to get new wells under the Program to Prevent High Animal Loss Numbers from Nitrate Contaminated Wells in 1993 they paid for Bradley Johnson to get a new safe well. However we downstream were not even given our well test reports. The DNR's Dale Adam's and Mitchell County Sanitarian continued to test my well and the others downstream as I was still concerned about all the runoff being directed by more shaped waterways to those sinkholes.

Most of that karsted aquifer recharge area south of Saint Ansgar that Robert Libra wrote about years ago is now drained down sinkholes or tiled in such a way it doesn't drain or outlet above ground. As tile needs slope to drain and that area has very limited soil depths sustainable farmers could not tile, but unsustainable farmers do and have even dug through the karsted bedrock to lay tile.

We need restrictions on Anhydrous Ammonia fertilizer application even more than the other biological fertilizer as this manmade fertilizer when introduced by Point Source channeling or tile outleting directly into our drinking water it doesn't die off in the cold and dark like biological fertilizer tends to do in our aquifers. Instead it builds up and even drops to deeper aquifers as the well tests have proven. We only have limited ground water and presently it is not being replaced by 1/2 inch almost weekly rains. When aquifers recharge now its with less frequent but larger rains. This particular contaminated plume broke through into the next deeper aquifer after the 2 - 2008 floods. When waterways and ditches are dug directing water to these sinkhole drains the force of this speeded up water hit the floor of our aquifer and broke it through to the next lower aquifer.

We are not enforcing our drainage laws in Iowa, as proved by the suit the IDNR said I had to file in 2005, after the polluters had gotten the IDNR to charge me with BLOCKAGE OF WATER in 2004. After I had filed that civil suit the group of farmers with no legal drainage outlet ripped out a 1/4 mile of my north 80 fence and brought heavy equipment in and dug away 42 acres of my farm to channel over roads to drain their over 2200 acres down into a National Wetland with six big sinkholes. They got surveys done for their Proposed Ditch surveys done by NRCS employees without ever asking permission and just trespassing on my farm. Unfortunately my health issues from our contaminated well (after my husband died in 1/2004 from the effects) took me to the Mayo Clinic for frequent care or appointments. In court in 2007 one of the bulldozer operators Mark Wagner who had trespassed said when asked if he had done a survey or asked permission of me to do the work he had done on my farm, he said, "No, she's a woman and doesn't know anything."

Later in 2010 I filed a Discrimination Charge CP # 07-10-59302 against the State of Iowa/Department of Natural Resources to try to get the Iowa DNR to effectively notify other well owners in the known on-going plume of contamination and accurately warn them and I also was asking for the Anti-Degradation laws, part of the Clean Water Act to be enforced and this particular plume stopped.

Point Source pollution is Profitable for the few in this Mitchell County Cedar (W) Township but it cut the property I owned in half and two of my family are dead because of it, being downstream from this on-going pollution plume killed my dreams of a happy farm life.

My renters downstream in Bremer County, who care for foster children have their well tested for the safety of those children and found their well tests positive for ammonia nitrogen as (N) this test result when added to their Nitrate test result totals over 15 and Des Moines's well tests total are below 10 as the EPA says below 10 is drinkable but Des Moines Iowa had to install multi-million dollar nitrate scrubbers to get the test

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 2 of comment #1189.

Timestamp 1/18/2013 11:41

**Name** Veronica Lack

**City** Iowa City

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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results below 10.

We need mandatory and strict enforcement of the Clean Water Act by the IDNR, it is their job, why aren't they doing it against the farmers that have now polluted the water downstream in Iowa City, Iowa, my drinking water in Iowa City now tests positive for anhydrous ammonia fertilizer or Ammonia Nitrogen as (N).

We need to stop dumping Anhydrous Ammonia down sinkholes and tile drains into our drinking water. It is not cheaply or easily removed from our drinking water and is building up since more people pollute after seeing others make so much money that it causes them to look the other way when animals and people die downstream.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1190.

Timestamp 1/18/2013 11:42

Name Kyler Oswald

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

I believe that it is very important for something to start being done to address the issue we have with water contamination. At this point it is not completely out of hand and we need to start addressing it now before it gets to the point where it is out of reach. That being said keeping the involvement in this fight against the nutrient contamination voluntary rather than mandatory is also very important. Farmers are naturally conservationist and will want to keep the ground and water healthy so to speak. That being said there needs to be proven ways to do so. So the more ISU provides scientific research supporting these practices and the more farmers interact and test these practices the better this program will be for not only the farmers but also the ground/water. I think that good point to start is to somehow get farmers to put more buffer strips back in. Along waterways and elsewhere in the fields where high erosion occurs, so many of these waterways and buffer strips have been taken out in recent years due to the high dollar crops. It's more economical for them to farm the ground. But it might be doing more harm than good. Bottom line when it comes to my opinion, something needs to be done and the nutrient reduction strategy is a great start but it needs to stay voluntary. Kyler Oswald

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1191.

Timestamp 1/18/2013 11:42

**Name** Tom Frantzen

**City** New Hampton Iowa

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Farmers would like to have the public trust when it comes to being good stewards of the environment but both the history of agriculture and what is going on at the present do not support this trust. If farmers are the original environmentalists please explain the Dust Bowl a catastrophe caused entirely by agriculture and greed. If the public wishes to see if today's farmers are doing a good job of being land stewards all they have to do is to take a trip across Iowa, especially on rural roads. Huge hog operations in Northeast Iowa are actively destroying wetlands, bulldozing woodlands and converting permanent pasture lands to intensive cropping. And they are doing this right to the edge of the streams. I have farmed in this same place for 40 years and I have never seen such a relentless assault on the environment. Voluntary guidelines are a joke. What matters in the world of huge corporate farms is obliterating anything in the road of their huge planters. Their destruction of fragile wetlands and woods will result in the worst soil erosion you can imagine and that disaster is coming. From where I stand and what I see as I drive across rural Iowa greedy farmers are doing anything for short term gain. This is no different than in the past and history will be repeated.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1192.

Timestamp 1/18/2013 11:48

Name Andrew Hill

City

State

Providing comment on the following sections:

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I am writing you to ask you to support the proposed Nutrient Reduction Strategy.

Iowa has a great wealth of soil and climate that allow us to be extremely important and the production of the world's food, fiber, and energy. Many different methods of farming have been used throughout Iowa's history. We have learned over time that different practices need to be used depending on soil type and slope, location north or south, and what is raised on the land. We have developed a host of practices that can be viewed as tools in a toolbox. These tools can be implemented any many combinations to achieve many desired goals such as productivity, profitability, and stewardship.

The strategy that has been proposed to help in reducing Iowa's share in the nutrient load in the Mississippi has many well thought out features. These include the science based options that can be used on our land. These additional tools for our toolbox can be used where appropriate. This strategy also allows new tools to be added as new ones are developed.

Please look at the methodology used in developing this Nutrient Reduction Strategy. I believe that you will find that its broad, science based practices can offer great opportunities when applied independently to the diverse geography of Iowa.

Please support the proposed Nutrient Reduction Strategy. Andrew Hill

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1193**.

**Timestamp** 1/18/2013 11:51

**Name** Travis Cox

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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I read the Executive Summary.

Please just do \*something significant\* to improve Iowa's waterways.

As a sustainability professor, an avid canoer, and a father, I know that something has to be done.

This seems like a first step. Take it!

And please don't let Agribusiness water this down (if you will forgive the pun).

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1194**.

**Timestamp** 1/18/2013 12:03

**Name** Barbara Dickins

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I have just read Jack Engstrom's informed opinion of the conservation practices that have brought us to a time of degradation of natural resources. I hope that someone will listen to his wisdom and put in place a plan to rectify the currently dangerous conditions.

**Name** Roger L. White**City** Cedar Falls**State** Iowa**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

The most repeated phrase in the explanation and in the policy is that it a "science and technology-based framework" to address the nutrient pollution of Iowa's lakes, streams and rivers. In itself, it is commendable that the Strategy is based on science and technology. However, the result still spells failure for Iowa and Iowans. That means failure to attain the overall motivating goal--reduction of the dead zone in the Gulf of Mexico.

Iowans have known for many years that we have a huge number of impaired bodies of water and the number and severity are increasing and not decreasing. Since that is not new knowledge, it is apparent that "voluntary action" by the state and its polluters has not and will not fix the problem now. More drastic action is required.

The Strategy fails to list goals for improvements either short or long-term. Without goals or benchmarks, it will not be possible to judge progress toward achieving the goals. Every educator understands that.

The Strategy relies on direct requirements on "point source" polluters like city waste water systems or industries, however for the largest contributors to the nitrogen and phosphorus pollution, there are only voluntary "suggestions." As noted above, voluntary actions have not resulted in improvements in the past and there is nothing in the Strategy to give one confidence that doing the same thing over again will yield a different result.

While the Strategy references conservation research, there is no direct connection in the document as to how the research will be applied to improve soil and water conservation and reduce nutrient pollution from "non-point" (agricultural) sources. Apparently, research results will add to the "suggestions" available to voluntarily approach the problem. This relates directly to the lack of goals or benchmarks and voluntary action noted above.

The Governor and several legislators continually talk about greater accountability for teachers and schools, but the accountability in this Strategy is lacking or invisible. Without accountability measures for the state agencies and for the individual sources of nutrient pollution, success will be accidental (if it occurs). More likely, the citizens of Iowa as well as those all the length of the Mississippi River will be subjected for the foreseeable future to continual nutrient pollution of our most essential and precious resource--clean water. And the dead zone in the Gulf of Mexico will continue to be a nasty and embarrassing legacy.

The state should immediately revise the draft Strategy to include the missing elements. Absent that, the US Environmental Protection Agency (EPA) should reject the proposed Strategy and return it for improvements. Finally, if the state and the EPA adopt this weak, watered-down Strategy, state and constituent organizational leaders who endorse it must explain how this will be different, and then they must be held accountable when this approach fails to clean up the pollution in our water.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1196**.

**Timestamp** 1/18/2013 12:15

**Name** Brian Borcharding

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am asking for your support of the nutrient strategy for Iowa. The impact has been seen in other states that have such plans implemented already. If not implemented properly, growers could see negative impact on production costs and several other variables. There needs to be a comprehensive plan implemented that would include research into areas such as soil types and their cation exchange capacities so that a "one size fits all" plan does not get implemented. Brian Borcharding

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1197**.

**Timestamp** 1/18/2013 12:22

**Name** Aaron Schroeder

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

let the farmers prove to you they can get it done ob their own. WHAT can be accomplished by asking nicely will amaze you! Aaron Schroeder

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1198**.

**Timestamp** 1/18/2013 12:24

**Name** Tom Wind

**City** Jamaica

**State** Iowa

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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I applaud the evaluation, study and proposals by IDALS, IDNR and ISU on this important environmental issue. As a farm landowner in Iowa, it is important to me to pass my farm on to the next generation in better shape than what my parents left for me. Because of this goal, I incorporate CRP, buffer strips, many waterways and my tenant uses no till operations. I have done the relatively easy things and there is not much more that I can do without making significant investments, increasing my operating costs and ultimately reducing my profits. Herein lays the problem with the voluntary strategy proposed by the Nutrient Reduction Strategy: why would any farmer or landowner voluntarily do these things if they increased their costs and reduced their income, especially if they were in a competitive cash rent situation? If they did, they would be at a competitive disadvantage. To be fair, everyone needs to be forced to use the nutrient reduction strategies developed for their watershed.

Most of us farm landowners are now millionaires and are now in better financial shape to make these investments than we have ever been. We should not be expecting ordinary tax payers to pay for the improvements for addressing this nutrient pollution problem.

I am 61 years old. Unfortunately I doubt that I will live long enough to see the day that this voluntary strategy will make a significant difference in our streams, rivers, lakes and the Gulf. The proposed strategies must be mandated to make any significant progress in nutrient pollution reduction.

Thank you for the opportunity to submit comments.

Tom Wind

515-386-3405

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1199**.

**Timestamp** 1/18/2013 12:26

**Name** brian galloway

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                               **Point Source**

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Secretary of Agriculture Northey,

I would like to express my support for a science based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I would urge state lawmakers to adequately fund the Iowa nutrient reduction strategy, as well as the state's other conservation cost share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

Many of the conservation practices we have implemented include waterways, buffer strips, terraces and tiling. Through the natural filtration of the soil we believe these are best practices for our farm and the surrounding environment. brian galloway

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1200**.

**Timestamp** 1/18/2013 12:26

**Name** Tim Schulte

**City**

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**  **Nonpoint Source**  
 **Policy**  **Point Source**

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Lots of good ideas have been around and promoted for a long time.

While there might be some practices that, with a little promotion, might catch on voluntarily, relying on volunteer participation is basically making all this research and hard work more difficult if not entirely moot.

While current abusive practices may have evolved out of innocent tradition, it is embarrassing that for so long now we have knowingly allowed lowans and Iowa based business to continue to contaminate our neighbors and life downstream. It's morally reprehensible to allow this to go on.

While best practices should be promoted, at the same time state wide, or ideally watershed-wide, regulation should be crafted so that watershed quality is protected from the temptation of more profitable short-term malpractices.

Most regulations should be watershed wide, stiff penalties should be set in place to deter deviants, enforcement should be funded and vigorous.

It is not ethical to continue polluting our long-neglected downstream neighbors, and it's not fair to those lowans who strive to be good business stewards to let unregulated market forces compell them to act contrary to best practices.

Relying on voluntary participation is a dangerous and immoral continuation of policy inaction.

I wish I had an easier suggestion, but that would have been implemented long ago.

Thanks for you time and effort

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1201.

Timestamp 1/18/2013 12:30

**Name** Jeff Tindle

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

Thank you for supporting agriculture!

I am writing you today to ask you to please support a science-based state nutrient reduction strategy. We have a chance to lead the nation in voluntary nutrient reduction with secretary Northey's plan.

A vital piece of that plan is to employ necessary conservation practices. Many of these projects are ready to be completed they are just waiting on cost share funding.

Please support Secretary Northey's plan and fund conservation cost share programs.

Thank you! Jeff Tindle

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1202**.

**Timestamp** 1/18/2013 12:30

**Name** Mike Fortin

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

Please help Iowa protect our lands by funding the nutrient reduction strategy and other conservation cost share programs. Mike Fortin

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1203**.

**Timestamp** 1/18/2013 12:36

**Name** Harry Ahrenholtz

**City** Jefferson

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                               **Point Source**

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Agriculture's Clean Water Alliance (ACWA) supports the nutrient management strategy that has been proposed for adoption in Iowa. Since its formation, our organization has been actively monitoring the waters of the Racoon and Des Moines River watersheds on a voluntary basis for over 12 years. The knowledge gained from our initial monitoring work led to a variety of pilot initiatives and demonstration projects aimed at improving water quality. ACWA members have invested nearly \$2 million in this pursuit since its formation. There have been measurable successes. Key conclusions from this effort have proven that there is no one size fits all solution and that informed producers want to adopt those practices that can impact improved water quality. We believe a science based approach for producers to implement the most effective practices specific to their farms can be the most powerful resource to achieve water quality improvement on a broad scale.

Harry Ahrenholtz, President



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1204.

Timestamp 1/18/2013 12:37

**Name** Steve Sandbothe

**City**

**State**

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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Secretary of Agriculture Northey,

I would like to ask that you fund the Iowa Nutrient Reduction Strategy as well as the state's other conservation cost share programs.

Living near the Mississippi I understand the need, and the desire by producers to do what is right and this strategy is ideal. Steve Sandbothe

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1205**.

**Timestamp** 1/18/2013 12:39

**Name** Mendy Stender

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I feel that the state of Iowa needs to have a better science-based state nutrient reduction strategy program. The voluntary conservation practices and maintaining agricultural production are very important for the farmers to have.

I feel the state needs to be doing a better job at funding the state Nutrient Reduction strategy and other conservation cost-share programs. In the past the state has not adequately funded these programs, which has hurt and delayed our conservation programs. The state need to get the conservation practices back on schedule to help the farmers with their farm grounds. So we can keep the crops growing yearly to support our family's. Mendy Stender

**Name** Thomas A. Evans**City** Granville**State** Ohio**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

January 18, 2013

Mr. Chuck Gipp

Director, Iowa Department of Natural Resources

Wallace State Office Building

502 East 9th Street

Des Moines, Iowa 50319

Mr. Bill Northey

Secretary Iowa Department of Agriculture and Land Stewardship

Wallace State Office Building

502 East 9th Street

Des Moines, Iowa 50319

Dear Mr. Gipp and Mr. Northey:

Thank you for the opportunity to comment on the draft Iowa Nutrient Reduction Strategy released on November 19, 2012, made possible by the extension of the comment period from January 4th to January 18th. I am also grateful for the opportunity to view a December 21st public meeting webinar, available because of a poorly timed snowstorm. Besides the webinar I have reviewed documents related to my greatest concerns about the Strategy: Executive Summary and Section 1: Policy Considerations and Strategy and Section 2: Nonpoint Source Nutrient Reduction Science Assessment.

I am a former chemistry professor, retired after a 40-year career of teaching and research at a liberal arts college in central Ohio. I grew up in Iowa, living in various communities in the state—Clinton, Knoxville, Cedar Falls, Spencer, Mason City and Des Moines—and graduated from Grinnell College. My love for the state was encouraged by my father's commitments to his hometown, Linn Grove, IA and his knowledge of the state, developed from his perspective as an economic forecaster for what was then the Northwestern Bell Telephone Company. Although I have an appointment as a Visiting Scholar at the Ohio State University, I have devoted significant time since retirement to a variety of environmental and sustainable agricultural issues, activities that have included a number of visits to Iowa, including attending a Mississippi River Basin Commission meeting held in Des Moines a few years ago. I have met a number of wonderful people in and out of Iowa state government with strong and effective commitments to Iowa's environment and a sustainable future for its agriculture. One of my expectations of the draft Strategy was that these individuals, and others like them, deeply committed to improving the quality of Iowa's streams, rivers and lakes, would be inspired by the strategies set forth. The document fails this test, which is why I am taking the time to comment. Much of the detail in the strategy policy discussion seems to be designed to describe non-point source issues as impossibly complex. There is not enough detail or evidence of real commitment to support claims of aspiring to national leadership. It is not enough to say funds are scarce/diminishing. A more powerful strategy would have acknowledged the need to pass a sales tax increase to fully fund the Natural Resources & Outdoor Recreation Trust Fund, a trust fund that a majority of Iowans supports and take aggressive action now.

The Science Assessment contains important information to guide policy makers. It is broad in scope, adequately detailed and appropriately referenced. However, I have been unable to find a citation to a Baker and Helmers paper, the basis for a paragraph in the policy discussion and a slide in the webinar that was also included in the webinar. The paragraph from NRS-1:

Note...this paragraph had to be copied as a picture from the online document and cannot be pasted into this document. The paragraph begins "According to Baker and Helmers..." and ends "When that happens some nutrients are certain to be lost." I find it interesting to have encountered this difficulties when trying to understand statements that are so central to the policy strategy.

Without reading the whole paper I am forced to accept the implication that since nutrients are naturally going to come out of soil, Gee, there's nothing we can do! where the we is farmers. This is simply not true as the various scenarios show. If there were a simple solution Iowa or if its recent history reflected a more aggressive commitment, the state's water quality problems would be much more manageable. Strategies important to going forward now need not be perfect. Much of the policy discussion seems an effort to avoid doing anything.

Name Thomas A. Evans

City Granville

State Ohio

Providing comment on the following sections:

<input checked="" type="checkbox"/> Executive Summary	<input checked="" type="checkbox"/> Nonpoint Source
<input checked="" type="checkbox"/> Policy	<input type="checkbox"/> Point Source

I have lived in Licking County, Ohio since 1968. Licking County is the home of the Croton Egg Farm, a CAFO founded in 1980 with a remarkably bad environmental and animal care history. A group that included Jack DeCoster, whose participation was initially hidden because he was banned from operating in Iowa, eventually replaced the original ownership. Recently DeCoster and his group were replaced by an ownership group that includes individuals from Sioux County, Iowa. Now permitted to house more than 7 million hens, the egg CAFO seems to be a more responsible operation today. However, the environmental and animal care violations of the past happened and they happened despite the fact that the headquarters of the Ohio Department of Agriculture is also in Licking County and the state's land grant school, Ohio State, is less than an hour's drive from the egg CAFO, neither organization able to influence the decisions of owners/managers controlling the quality of the operation. Their failure should not be interpreted as an excuse to abandon regulatory efforts or research. The Strategy offers the promise of a new era of cooperation without any evidence of a dramatic change in attitudes that block N and P reduction efforts or benchmarks for attitude adjustment efforts. The values of those who operate facilities, from the smallest farm to the largest CAFO determine the success of any strategy informed by science and technology.

Neighboring states whose approaches informed aspects of the Strategy do not include Ohio. I draw your attention to Ohio's Clean Lakes Initiative, <http://www2.ohiodnr.com/cleanlakes/> a belated effort established in July 2012 to bring under control the eutrophication of Lake Erie and Grand Lake St. Marys. Grand Lake St. Marys is more than 3 times larger than West Lake Okoboji but much shallower, ranging from 5 to 7 feet deep, but still an important recreational resource in Ohio. Millions of dollars have been spent adding alum to precipitate dissolved phosphate in Grand Lake St. Marys and a manure management regime has been put in place, part of an overall strategy for improving water quality in the lake. <http://ohiodnr.com/tabid/22790/default.aspx> The Grand Lake St. Marys watershed was designated a watershed in distress in 2010. Since then rule making has included the following provision:

By December 15, 2012 farm owners/operators or person(s) responsible for producing, applying, or receiving in excess of 350 tons and/or 100,000 gallons of manure on an annual basis shall develop and operate in conformance with a nutrient management plan. This plan must address the method, amount, form, placement, cropping system and timing of all nutrient applications.

It is difficult to predict the effectiveness of this regulation. After ten years there will be information about management plans and practices but the adoption of improved methods is not guaranteed. How many farmers will ship their manure to another watershed? How many farmers will adjust their load so it falls below 350 tons or 100,000 gallons? However, this is an example of unnecessary regulation according to the Strategy even though it's basically a voluntary approach to gathering information about what is going on. Some aggressive rules are required in Iowa just to obtain data and perform the research that the Strategy identifies as desirable. Water quality in Iowa will get worse before it gets better. Waiting until we can predict the weather or the price of corn and beans should not be considered an option.

A number of citizen groups have advocated initiatives to improve the water quality in Lake Erie and Grand Lake St. Marys over the years. I was amused to see a slide of a burning Cuyahoga River, which flows through Cleveland into Lake Erie at the beginning of the webinar presentation. However, water quality is not a laughing matter and it is taking too much of citizens' advocacy efforts for what is being accomplished in Ohio or Iowa. Biology, the presence of the Iowa Lakeside Laboratory, and effective citizen groups in Dickenson County assures that most of the Iowa Great Lakes will avoid the fate of Grand Lake St. Marys, which will probably remain compromised for several decades. A Spencer High School classmate has made many trips to Des Moines to urge action that will protect the environmental and recreational values of the lakes. While attention should be paid to approaches and accomplishments in protection of the Iowa Great Lakes, duplication of this kind of citizen involvement across the state does not seem feasible. The scientific assessment offers a range of options but there is so little actual detail in the policy discussion of the Strategy in contrast to the USEPA comments on the draft Strategy that it is easy to conclude that nothing is feasible and that policy makers really don't care, expecting that some sort of minimal effort over the next several years will satisfy their constituencies and somehow get past the Basin Task Force and the US EPA.

The cartoonist Ding Darling is important to the conservation history of Iowa and the nation. His first conservation cartoon appeared in the Sioux City Journal in the 1920's in response to packing plant pollution problems in the Floyd River. At the time there were two options being considered, straighten the river so that the detritus moved down river faster or protect the river from the detritus. The decision was made to straighten the river. Straightening rivers is not an option for protecting the Gulf of Mexico from Iowa nutrients. Were Ding Darling to draw a cartoon response to this draft Strategy it would not be kind.

I have developed a particular interest in the state nature preserves of Ohio and Iowa, drawn to them initially by the severe funding cuts suffered by the Ohio Division of Natural Areas and Preserves. My wife and I have visited many state nature preserves in Iowa and Ohio. The natural features they contain and the values and commitments of those who created and maintain them and bring the special qualities of these preserves to the attention of visitors have impressed us. The draft Strategy makes clear to these people that what they value in Iowa's streams, rivers and lakes is not valued by powerful forces in the state who are prepared to block any significant progress. This is the 21st century. It is unacceptable to just say, we need more time and data as a reason for avoiding serious commitment to improve water quality. This Strategy needs to address seriously why needed data are not available now. This is not a new problem.

Northeast Iowa is known for its beautiful bluffs and their limestone cliffs. The limestone layers were created several million years ago, sometimes interspersed with loose material when conditions were not right for forming solid rock. I conclude from reading this draft Strategy that conditions are not right for really solving Iowa's water quality problems. Water quality across the state will get worse. Some future group will be charged with developing a new strategy. Hopefully, conditions will be better.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **3** of comment #**1206**.

**Timestamp** 1/18/2013 12:40

**Name** Thomas A. Evans

**City** Granville

**State** Ohio

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Sincerely yours,

Thomas A. Evans

226 South Main Street

Granville, Ohio 43023

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1207**.

**Timestamp** 1/18/2013 12:41

**Name** Donald Swanson

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

As a sixth-generation farmer in Wapello County, caring for our land and preserving it for future generations is our top priority. That is why we support the nutrient reduction strategy and voluntary conservation.

We have implemented many conservation practices to protect the water quality for ourselves and our livestock and to enrich the land for it to continue to take care of us for many more generations.

The conservation practices that we have voluntarily implemented include the use of cover crops, building terraces, leaving grass waterways and controlling manure run off with a catch basin. We know how important these and other conservation practices are in maintaining the viability of our farming operation.

Please support the nutrient reduction strategy and do not add more costly regulations.

Thank you. Donald Swanson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1208**.

**Timestamp** 1/18/2013 12:44

**Name** Brian Hoffman

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

As a farmer and land owner who already practices voluntary conservation practices, I urge you to continue to support funding for those programs. Without funding, delays for these projects would turn back the clock for conservation instead of allowing us to move forward and saving and improving our valuable farmland. Brian Hoffman

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1209**.

**Timestamp** 1/18/2013 12:45

**Name** laurie mcknight

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I would like to express my support for the Iowa Nutrient Reduction Strategy. It is a voluntary science based-program that needs to be adequately funded. For the most part farmers have always done their share when cost-share funds were made available. laurie mcknight



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1210**.

**Timestamp** 1/18/2013 12:49

**Name** Kevin S. Vinchattle

**City** Urbandale

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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These comments are submitted on behalf of the Iowa Poultry Association.

The Iowa Poultry Association is supportive of the Iowa Nutrient Reduction Strategy.

Iowa's natural resources are of utmost importance to the people of Iowa. It is these resources that sustain our lives and our livelihoods. No one knows better than we here in Iowa how to go about protection efforts.

The current strategy is the result of a comprehensive collaborative effort. We believe it is focused on efforts that can be controlled versus arbitrarily set numeric standards.

The men and women involved in feeding a hungry world will do everything they can to protect natural resources. It is these same resources that fuel their food-producing (farming) operations. The key to assisting agriculture is to provide the flexibility to respond. Prescriptive approaches that lack flexibility will not work.

Again, we are supportive of this strategy.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1211**.

**Timestamp** 1/18/2013 12:52

**Name** Andy Gonseth

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

With our every growing population in this country, there is more requirement for farmers to grow more food to feed the needed supply for growth. But as farmers agricultural production grows, the need for conservation projects, and the funding needed to implement these programs, needs to continue, and grow in the funding to support such needed programs. As a farmer myself, i ask you to fund the Iowa Nutrient Reduction Strategy, that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production in the state of Iowa. Andy Gonseth

**Name** Jodi Enos-Berlage**City** Ridgeway**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

As a scientist, educator, member of a local watershed improvement association, lead researcher on a collaborative watershed monitoring project, daughter of beef farmers, co-owner of a small livestock farm, and spouse of a 20-year Farm Bureau member with dairy interests, I offer the following comments to the developers of the Iowa Nutrient Reduction Plan:

1. The science assessment is impressive and will serve as an invaluable starting resource for Iowa and other Midwestern states to improve water quality. In particular, the tools that the science assessment provides will make development of a nutrient reduction strategy possible. However, the science assessment is missing a critical component, specifically a section devoted to the social science aspect of this project. A large amount of research exists on why humans make the decisions that they do, and the types of incentives and disincentives that are effective in influencing these decisions. Given that success of the strategy will be completely dependent on human decision-making, much of it at the level of individuals, it is essential to include this data in the science assessment and use it to help shape the policy/strategy section.

2. The strategy outlined for point source pollutants is for the most part clearly articulated, with specific goals and mechanisms to achieve them, both in terms of structure and expected financial support. However, the details provided primarily target municipality-based nutrient reduction, with relatively little attention to that which is industry-based. In addition, timelines for point source nutrient reduction are lacking. These elements should be included.

3. The strategy outlined for non point source pollution is severely lacking in multiple essential elements if it is to be called a "strategy". In particular, the following issues deserve attention:

a. The strategy needs specificity in terms of goals, mechanisms to achieve goals, implementation plans, and timelines. Although the document does indicate that higher contributing watersheds will be prioritized, it is not clear what will happen in these watersheds as a result of them being targeted. In fact, the writing is so nebulous that it is difficult to discern what the document is actually trying to communicate. A strategy is defined as a method or plan chosen to bring about a desired future. This document, as currently written, lacks both a plan and a method.

b. The background information seems defensive and partial, collectively damaging the credibility and science-based nature of the document. For example, the document focuses only on the problems with establishing numeric criteria (and not potential benefits), the challenges of adopting best management practices (rather than the new opportunities provided by the science assessment), and the progress that has been made in Iowa conservation (rather than acknowledging that past efforts, while valuable, have been insufficient, or exploring why this is the case, e.g., is it possible that increased corn/soybean acreage or tilled acreage negate those conservation efforts in terms of the total nutrient output?). The problem is not so much what is included in the background information, rather, what is missing. This approach does a disservice to all stakeholders, suggests a biased viewpoint, and ultimately will inhibit development of an effective solution.

c. The "strategy" appears to be based primarily on attempts to expand current practices, yet evidence that current practices can i) achieve the desired goal, or ii) be realistically expanded, is not included. Nutrient reduction watershed projects (on a more local scale) have been ongoing in the state for a long time. What is the evidence that they have been successful (in terms of percentage of landowners involved, practices implemented, and improvements in water quality)? If successful models do exist, what is the evidence that they are expandable (in terms of increased numbers of willing landowners and financial resources)? These elements are critical for convincing Iowans that the plan has a chance of working. If such evidence does not exist, the strategy needs serious revision.

d. As outlined, the overall strategy will require tremendous financial resources, yet the sources specified are entirely inadequate. Although the document clearly indicates expected increased contributions from municipality residents (and rural residents who purchase properties needing septic upgrades), there is no comparable expectation stated for industries, agricultural producers, or Iowa taxpayers. Everyone benefits from improved water quality and should be expected to help support this effort. However, the request for public support would be greatly strengthened by explicit, concurrent requests for industries and agricultural producers to make a larger conservation/nutrient reduction investment in their own operations, especially in the midst of a historic agriculture economic boom that has given producers the financial ability to make unprecedented investments in land and equipment. In fact, if the strategy does not include such expectations for the businesses that profit while adding to the nutrient load, it is hard to imagine how it will ever win taxpayer support.

e. The strategy, as currently written, is severely lacking in innovation. This omission is by far the biggest disappointment and the reason that both farmers and scientists have privately stated to me that it will never work. In fact, comments from several farmers inspired many of the points below. Specifically, an innovative strategy would be one that:

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 2 of comment #1212.

Timestamp 1/18/2013 1:00 PM

**Name** Jodi Enos-Berlage

**City** Ridgeway

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

- 
- Uses substantial incentives to engage all landowners in a watershed.
  
  - Involves policies that offer a  middle ground between a voluntary vs. mandated strategy (recognizing that both have advantages and drawbacks). Such policies, which preserve freedom of choice but create incentives/disincentives that promote positive choices, exist and can be found in social science research.
  
  - Has local control and leadership, chosen from and by watershed landowners
  
  - Offers both flexibility and responsibility to individual landowners
  
  - Levels the financial playing field between farmers who are willing to make nutrient reduction investments and those that are not
  
  - Establishes a local nutrient reduction goal, a timeline to achieve that goal, and financial opportunities for those willing to adopt practices before the end of that timeline
  
  - Establishes a  plan B that will be implemented in case goals are not met by the timeline; landowners most affected by plan B would be those that had not yet engaged
  
  - Fairly addresses the responsibilities of absentee landowners/renters
  
  - Offers watershed-scale planning, authority, and resources, recognizing that some of the most effective nutrient reduction strategies in a watershed (and costs) will not be distributed equally along property lines
  
  - Consistently and regularly discloses (to all Iowans in an accessible form) the progress of all watershed projects in the state, highlighting those watersheds that have made the most progress, and the least

In summary, I want to emphasize that the substantial time and thought that went into these comments was driven by real concern for the future of water resources in Iowa (and other states). I sincerely hope that the developers of the Iowa Nutrient Reduction Strategy take the necessary time to carefully review all of the public comments, consult additional resources, and revise the strategy accordingly. To rush forward with this plan (and costs), whose policies have not been supported (at least privately) by any of the stakeholders I have engaged with, would be a mistake. With the inclusion of a social science element, the science assessment is ready to move forward. The policy section, on the other hand, is in need of much additional work. The State of Iowa can do much better. The tools are available to create a plan, an innovative plan, that Iowa leaders, agriculture producers, and citizens can all be confident of and proud of. I look forward to seeing a revised document that incorporates the public review. Thank you for the opportunity to comment on the strategy.

Sincerely,

Jodi Enos-Berlage

Ridgeway, IA

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1213.

Timestamp 1/18/2013 1:03 PM

**Name** Gary Johnson

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please adequately fund the Iowa Nutrient Reduction Strategy as well as the state's other conservation cost-share programs. Gary Johnson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1214.

Timestamp 1/18/2013 1:04 PM

**Name** Teresa Schulte

**City** Iowa City

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Thus far what I've seen of the Nutrient Reduction Strategy is incredibly lacking and pandering to corporate interests. As an alum of Iowa State, I'm saddened to see the university connected with this. Why was there no transparency and why did the Farm Bureau write it? At this point the Farm Bureau represents big corporate farms much more than the 'little guys' and corporations look at the bottom line and making a profit, not what is good for the environment. Where are the specific practices that need to be followed to reduce nutrient runoff and soil erosion? Quit with the vague ideas and get practical! Also, these strategies need to be mandatory, voluntary practices will not work, corporations will claim they can't voluntarily do them because it'll hurt their profits and then the little farmers can't do them as it will cost them and, since the big farms aren't doing them, they'll be run out of business. I remember learning about soil conservation practices way back in the 1970's-early '80's and I cannot believe that we are STILL having these discussions about what our lack of action is doing to the Gulf of Mexico! We must take responsibility for our pollution and save our soil, that means real action with real consequences for inaction and this includes EVERYONE, big corporations, small farmers, city people putting sprays on their lawns, all of us. Please act and think of the land, Earth before money!

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1215.

Timestamp 1/18/2013 1:05 PM

**Name** Duane Vos

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                               **Point Source**

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Secretary of Agriculture Northey,

We all know volunteers can make a difference, and there is no exception when it comes to conservation practices in Iowa. Voluntary conservation practices along with maintaining agricultural production can be achieved by supporting a science-based state nutrient reduction strategy.

Iowa's conservation cost-share programs along with the Iowa Nutrient Reduction Strategy must be funded, or risk being delaying needed conservation projects. I ask as lawmakers, you support this funding.

As families, friends, neighbors all in the same agricultural community, we need to share our current conservation practices, future planned practices such that our farms and surrounding environment reap the benefit. Duane Vos

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1216**.

**Timestamp** 1/18/2013 1:07 PM

**Name** David Prose

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Please help us protect iowa's environment by funding the nutrient reduction strategy and other conservation cost-share programs. David Prose



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1217**.

**Timestamp** 1/18/2013 1:08 PM

**Name** Derek Von Ahsen

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

My name is Derek Von Ahsen. I am writing today to let you know that I, as a farmer in Iowa, am in full support of the Nutrient Reduction Strategy. This is one project I believe will help all farmers and the environment at the same time. I also believe by stepping up and working at this now, we will save ourselves a lot of future headaches and frustration. This will not happen without your support. We need you as leaders to step up and fund these programs.

Myself as a farmer am trying to do my best on my own with these practices. I am a firm believer in no-till, buffer strips, and other practices that will benefit not only us but our children as well. Please stand up and help us help our future. Thank you Derek Von Ahsen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1218**.

**Timestamp** 1/18/2013 1:08 PM

**Name** Douglas Boland

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

We all want clean water and I have been voluntarily working to improve the water ways on my farm, using no-till whenever possible and seeding steeper slopes, to retain my soil and nutrients, and insure any water leaving my farm is as clean as possible.

Your support for a science based nutrient reduction program and funding for conservation projects, on a voluntary basis will be greatly appreciated. Douglas Boland

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1219.

Timestamp 1/18/2013 1:10 PM

Name Heath Gieselman

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing today to encourage you to support the Iowa Nutrient Reduction Strategy. This type of approach is the most effective way to implement sound conservation practices and reduce runoff related to agriculture. I feel the implementation of strict regulations would not only hurt our agriculture economy and production but also be impractical to implement due to the high cost of enforcement and the resulting bureaucratic quagmire.

It is important that you act to fund this strategy and other conservation practices. Funding should include cost-sharing with agriculture producers to expedite the implementation of conservation techniques. Funding should also include continued research of conservation methods which can be used to improve the nutrient reductions strategy in Iowa. I feel the research should focus on evaluating the performance of conservation methods such that a □ Best Practices guide can be developed and implemented. Perhaps this guide can be based upon the 8 major landform regions in Iowa and a quantitative performance index of various conservation practices can be determined to assist in reaching the goals that have been set forth by government agencies. These steps have already been started in the Iowa Nutrient Reduction Strategy and should continue to be developed with further funding.

On our farm we value the use of conservation practices. We use such techniques such as variable rate fertilizer spreading, reduced tillage practice, and split nitrogen applications to minimize our nitrogen inputs. We also have established riparian buffer strips, long term tree plantings, and erosion control structures such as permanent waterways and terraces or berms. As Iowa farmers we feel it is our duty to care for the land in a way that it will continue to produce food and feed the world and I feel that the majority of producers in the agriculture industry share this goal with us.

Feel free to contact me with questions or comments. Heath Gieselman

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1220**.

**Timestamp** 1/18/2013 1:10 PM

**Name** Jeremy Atwood

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Farm Bureau is asking its' members to write our elected officials asking their support of the Iowa Nutrient Reduction Strategy and it's funding. I am not very familiar with this plan or how much it costs. I would just ask for common sense when looking at something like this and how much it costs. Conservation of our land and water is key to preserving our resources for generations to come. Cost share programs can provide the needed incentive for some farmers to go above and beyond what they are already doing for conservation. Jeremy Atwood

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1221.

Timestamp 1/18/2013 1:12 PM

Name Chad Hafkey

City

State

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support the Nutrient Reduction Strategy due to voluntary implementation of science based conservation practices. They may be applied where deemed appropriate by each operator allowing agricultural production to maintain the current output trends. This strategy demonstrates the producer's desire to care for soil and water while establishing credibility of modern agricultural practices and adding validity to conservation efforts.

Success for the strategy and the state's other conservation cost share programs is highly reliant on the funding levels. Failure to adequately fund programs in the past has impeded the progress desired by operators on conservation practices that benefit their farm and the surrounding environment. I encourage you to provide the funding necessary for a successful participation rate in the strategy. This is crucial for it to be effective in its role of nutrient reduction and hopefully maintaining a voluntary basis.

I have been fortunate for the opportunity to utilize the state's cost share programs involving reshaping and establishing eroded waterways as well as installation of tile to protect the waterways. The cost share was absolutely impactive in helping persuade landowners of rented farms that fell in the same watershed as the farms we own to participate in the efforts to protect soil and water. These efforts have been noticed and appreciated by many in the community from compliments I have received for these actions. Chad Hafkey

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1222**.

**Timestamp** 1/18/2013 1:15 PM

**Name** Chasen Stevenson

**City**

**State**

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

I am a third generation farmer operating in the Marion county area. My father, brother, and I have row crops as well as a cow calf herd. At this point our farm implements a variety of conservation practices, voluntarily, that is aimed at keeping the rich Iowa soil where it belongs and keeps nutrients where the crops can use them. Terraces, waterways, buffer strips, and headlands are a few examples of what we already do.

In my situation having a science based nutrient reduction strategy that is voluntary really makes since. I like to look at how different practices have worked in different areas. And I believe this is the feeling of most farmers out there. One practice that I am very interested in is cover crops. If there was a way to cost share some of these practices that will make it more economically feasible for producers those options should be looked at.

I feel the farmers and ranchers of Iowa when given the chance, and the means in which to do it, will voluntarily use more conservation practices. This won't happen overnight, but with science and research the farmer and ranchers of this state will make a difference. Chasen Stevenson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1223**.

**Timestamp** 1/18/2013 1:18 PM

**Name** Emily Wuebker

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I encourage you to support the science-based state nutrient reduction strategy. It recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. I urge you to adequately fund Iowa Nutrient Reduction Strategy, as well as other conservation cost-share programs. If Iowa's failure to fund these programs in the past has delayed needed conservation project. Emily Wuebker

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1224**.

**Timestamp** 1/18/2013 1:19 PM

**Name** Sara Adrian

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am writing to you today in support of the Iowa Nutrient Reduction Strategy and am asking that you adequately fund the program, as well as other conservation cost-share programs. The strategy is a science and technology-based approach developed by the Iowa Department of Agriculture and Land Stewardship (IDALS), the Iowa Department of Natural Resources (DNR), and Iowa State University (ISU) to encourage the adoption of voluntary conservation practices that will have the greatest benefit for water quality in the state. It uses ISU research to determine which practices are most effective when applied to Iowa's unique landscapes. The strategy outlines these efforts in a scientific, reasonable and cost-effective manner.

My husband and I are constantly looking for ways to improve and protect our environment and water, but a program such as the one imposed on farmers in the Chesapeake Bay area would not be smart. How we farm and where we farm in Southeast Iowa is much different than someone who farms in Northeast Iowa, therefore a one-size-fits-all regulation could do more harm than good.

Again, I am asking for adequate funding of the Iowa Nutrient Reduction Strategy and other conservation programs. Failure to sufficiently fund similar programs in the past has delayed needed conservation projects. Sara Adrian



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1225.

Timestamp 1/18/2013 1:24 PM

**Name** Cale Plowman

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Please fund the Iowa Nutrient Reduction Strategy so farms like mine can voluntarily maintain and improve our conservation practices. Cale Plowman

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1226**.

**Timestamp** 1/18/2013 1:27 PM

**Name** Scott Sieren

**City**

**State**

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

I'm contacting you today to express my support for continuing voluntary conservation practices as

as a viable solution for nutrient reductions in our state. On our own farm we maintain a wide variety of conservation practices that include grass waterways, field borders and contour strips as well as terraces. Many of these practices have been installed voluntarily or funded with cost-share conservation program dollars.

I urge you to continue to fund these programs as well as the Iowa Nutrient Reduction Strategy. We can continue to do what's best for our state on a volunteer basis at the state and local level.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 2 of comment #1226.

Timestamp 1/18/2013 1:27 PM

**Name** Scott Sieren

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **3** of comment #**1226**.

**Timestamp** 1/18/2013 1:27 PM

**Name** Scott Sieren

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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. Scott Sieren

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1227**.

**Timestamp** 1/18/2013 1:33 PM

**Name** Peter Alexander

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

With the budget surplus that the governor has boosted about, please fund the nutrient reduction strategy fully. Has a cattlemen and a farmer, I already practice voluntary practices. One reason just common sense and the other because my children have come home from school and told me how I pollute the world. So practicing measures has two meanings for me to prove to my children that I do care about the world and the other is to prove to the teachers that they are full of it.

Please fund this project that other dads can prove to their kids that they care about the world. Peter Alexander

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1228**.

**Timestamp** 1/18/2013 1:38 PM

**Name** James Dane

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I want to add my voice to the widespread acclaim for the Iowa Nutrient Reduction Strategy.

Voluntary conservation practices work. I've been using them widely on my farm since the 1985 Farm Bill. It is much better to bring farmers along willingly than to set up strict rules and harsh penalties.

In addition to planting every acre using no-till farming methods, I have field buffers along every stream and creek on my farm. I also have buffer strips that break up my long slopes to reduce the speed of water and soil erosion. Further I have strategically placed strips of Conservation Reserve Program lands that take my most erosive soils out of continuous row-crop production.

But I know I can do better as I learn better ways to control erosion and reduce nutrient run-off.

I urge the Iowa Legislature to fully fund the Iowa Nutrient Reduction Strategy. Other states are watching us to see how the leading agricultural state treats its greatest resources--with respect and science-based strategies or with rules, regulations, and penalties.

I believe we are fortunate to put together the resources of IDALS, the DNR, and ISU to develop a comprehensive strategy to reduce nutrient loss.

Let this process work.

Thank you. James Dane

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1229.

Timestamp 1/18/2013 1:39 PM

**Name** Roger Maddux

**City** Ames

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The proposed Iowa Nutrient Reduction Strategy, according to the document itself and according to the explanations of the strategy provided at the informational meeting in Ames, is predicated on the idea that Iowa farmers, if asked, will do much, much more to reduce water pollution than they have done during the past thirty years, and will do so at their own expense, since public funds are in short supply. The strategy contains no timetables, no clear goals, no significant funding, no real implementation plan, no accountability, and no reason for Iowans to believe that most farmers will not continue to respond to the current strong economic incentives that have been driving row crop production up and water quality down. In fact, all Iowans familiar with agriculture will realize that all production farmers will do far, far less to control pollution. They will all tear up all the fence rows, plow up all the CRP, farm all the pastures, and dump absolutely incredibly huge amounts of fertilizers on their land to increase production as much as possible, thereby drastically increasing water pollution in Iowa, in the Mississippi, in the Gulf, and the world.

As a political means of keeping the EPA off Iowa's back and postponing serious action on water quality for at least a few years, this strategy, if it were adopted, might be successful. As a means of actually cleaning up Iowa's dirty water, it will most definitely and obviously fail. Requiring towns and cities to take action cannot succeed as long as action by agriculture, which is the major source of the nutrient problem, continues to be completely voluntary. The primary blame for water pollution lies squarely on farmers. They are the ones who create the vast majority of the nutrient and sediment pollution, and this strategy is designed to encourage them to keep doing it. After all, requested action by farmers is "only voluntary", so the message to them is, "you really don't need to worry about doing anything about water pollution".

Like many other Iowans, I've been going out of state every year to enjoy outdoor recreation in clean water. I would like to be able to enjoy clean water where I live. Like a few other Iowa landowners, I've been converting formerly row cropped land to prairies and wetlands, partly for the sake of water quality. But as was pointed out in a recent ISU report, many Iowa landowners and operators are doing little or no farm conservation at all. This strategy is not only inadequate, but is also unfair to conservation-minded landowners and operators, to urban Iowans, and to all the citizens of Iowa who help to support agriculture through our taxes and who also want cleaner water.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1230**.

**Timestamp** 1/18/2013 1:45 PM

**Name** Brent Koller

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am asking for your support for the Iowa Nutrient Reduction Strategy. This is a science-based program that voluntarily implements conservation practices on our important agricultural land. A failure to fund this program will delay the needed conservation projects. This investment is needed for today and future generations of Iowans. Brent Koller



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1231.

Timestamp 1/18/2013 1:48 PM

**Name** Ed Ulich

**City** Solon

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Such an attempt needs to be all inclusive if it is going to be effective. This includes nonfarm reduction particularly municipal waste and industrial pollution.

From an agricultural standpoint, I feel we have been effective on our farm and we need to be since our run off goes into the pristine Lake MacBride. We have done multiple programs including stream bank protection, terraces, grassed waterways, filter strips, ponds, wet land creation, wildlife cover, side dress fertilizing, tree planting, no till since 1978, and using cover crops. We are apparently doing the right things since we won the American Soybean Association's National Award for Conservation last year. This is the environment we live in too and the water we drink.

There seems to be evidence that cover crops do even more good than we realize. If managed properly they protect the soil from erosion, recapture left over nutrients from the previous crop to be mineralized for the next crop, improve the soil structure and its ability to hold water, air and nutrients. This attempt ought to go beyond nutrient reduction to nutrient management.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1232**.

**Timestamp** 1/18/2013 1:52 PM

**Name** Rodney Swales

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Gentleman the state of Iowa will be looking at the Iowa Nutrient reduction strategy plan as a way to continue to improve the quality of Iowa's water in Iowa by encouraging the use of best management practices for soil conservation and nutrient plans was developed by the Iowa Department of land stewardship Iowa Department of Natural Resources and Iowa State University. The plan uses very sound science and technology ideas. Iowa farmers have made great advancement over the years to help to help conserve soil and reduce the use of manure or chemical based nutrients in Iowa. This plan will help us to continue or work is improving our water Quality thank-you Rodney Swales Rodney Swales

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1233.

Timestamp 1/18/2013 1:53 PM

**Name** Jane Alexander

**City** Jefferson

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The strategy for non point source pollution (farm runoff) is doomed to failure because it is merely status quo. All voluntary programs have failed to curb pollution up to now and there is no evidence they will not continue to fail.

The strategy fails to define goals for clean water. This is not surprising since it was written by the Farm Bureau who want to pretend farm pollution doesn't exist.

The strategy doesn't say where the funding will come from or put a value on the benefits of clean water.

The strategy makes no mention of the unchecked growth of CAFOs in Iowa which dump huge amounts of pathogenic slurry into our soil and water even in sub watersheds already defined as high priorities for nitrate reduction.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1234**.

**Timestamp** 1/18/2013 1:58 PM

**Name** Lynn Olsen

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I have farmed for 40 years now and have always complied with conservation practices to protect the water. I have done so by building terraces to protect run off into the creeks also using some buffer strips. I want to continue to be part of the solution to this problem.

I would urge you to support a science based state nutrient reduction strategy that recognizes the importance of voluntary conservation.

New regulations in our fine state is NOT the answer.

Thank you. Lynn Olsen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1235.

Timestamp 1/18/2013 1:58 PM

**Name** Tim Harden  
**City** Cedar Rapids  
**State** Iowa

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input checked="" type="checkbox"/>	Point Source

January 18, 2013

VIA ELECTRONIC SUBMISSION:

Mr. Chuck Gipp, Director  
Iowa Department of Natural Resources  
Wallace State Office Building  
502 East 9th Street  
Des Moines, Iowa 50319

Mr. Bill Northey, Secretary of Agriculture  
Iowa Department of Agriculture and Land Stewardship  
Wallace State Office Building  
502 East 9th Street  
Des Moines, Iowa 50319

Re: Iowa Nutrient Strategy Public Input  
Interstate Power and Light Company

Dear Mr. Gipp and Mr. Northey:

Interstate Power and Light Company (IPL) is an Iowa-based electric and gas public utility engaged primarily in the generation and distribution of electric energy and the distribution and transportation of natural gas in selected markets of Iowa and Southern Minnesota. IPL supplies electric service to over 500,000 customers and natural gas service to over 200,000 customers.

The Iowa Department of Natural Resources (IDNR) and Iowa Department of Agriculture and Land Stewardship (IDALS), in conjunction with Iowa State University, have requested public input on the draft of the Iowa Nutrient Reduction Strategy (draft strategy) released November 19, 2012. The purpose of the draft strategy is to detail Iowa's state-level plan for reducing nutrients, per response to the 2008 Gulf Hypoxia Action Plan.

IPL commends the collaborative effort utilized in composing the draft strategy and appreciates the opportunity to provide comment. IPL is supportive of the long-term reduction goals outlined in the draft strategy, but feels the draft strategy could benefit from additional clarity regarding near-term goals, measurability and detailed implementation requirements for industrial point-sources.

IPL has the following suggestions for improving the clarity, structure and scope of the draft strategy.

1. Provide a clear application and consistent language for all stakeholders. The Preparation and Presentation section of the draft strategy states that the strategy outlines voluntary efforts. However, the draft strategy goes on to detail point-source requirements that are linked to National Pollutant Discharge Elimination System (NPDES) permits. NPDES permits are mandated under the Clean Water Act for certain affected sources, including steam electric power plants. IPL understands such efforts may include data collection requirements, which could be imbedded into facility NPDES permits, and therefore could be interpreted as compliance requirements. This may create confusion for point-sources and seems to imply that the voluntary aspect of the draft strategy is only applicable to non-point sources. Additionally, in the

**Name** Tim Harden**City** Cedar Rapids**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

Point Source Policy section (p.2) the draft strategy states  & will require implementation & goes on to detail targeted reductions of 2/3 total nitrogen (TN) and 3/4 total phosphorus (TP) from levels currently discharged. These statements would seem to contradict requirements detailed in Section 3 for point-source facilities at or below the 10mg/l TN and 1mg/l TP thresholds. Further clarity and consistency is desired here.

2. Categorize point-sources and utilize a consistent outline. IPL feels the draft strategy could provide greater clarity through categorically grouping point-sources and utilizing a standardized strategic outline to provide nutrient reduction goals, implementation and measurability details. One approach could be to group Publicly Owned Treatment Works (POTWs) separate from all other point sources. This would allow a more target-specific strategy to be developed and tailored to each group of point sources. Currently, the draft strategy seems to provide a  one size fits all approach. The draft strategy clearly outlines the three tiers of removal and the technology based and Water Quality-Based limits for POTWs. That same structure and clarity is absent for industrial point sources, especially in the Implementation Plan Detail section.

3. IDNR and IDALS should consider adding  no action and  net-addition language. IPL feels the strategy language should incorporate a  no action requirement for facilities with effluent at or below the proposed TN and TP limits. Additionally, the strategy should consider inclusion of net-addition language for facilities withdrawing surface water, such as once-through cooling water. Those facility  s discharges should be subject to the limit on a net-addition basis, to account for existing concentrations present in the surface water.

4. Feasibility study implementation. IPL feels further development of the feasibility study requirement is necessary for providing a clear understanding of its purpose. In the draft strategy it is unclear who conducts the feasibility study, when the study does or doesn't need to be conducted, how the feasibility study differs from antidegradation, and if there are mandatory requirements resulting from the feasibility study.

5. Provide a means to account for measurability. IPL would encourage the development and inclusion of a measurability section. Since the NPDES permits are issued on a five year rotation it  s possible that process changes could allow a point-source to reach their reduction goal prior to the next permit renewal. Including a measurability detail that offered an incentive for reaching the reduction goal may yield favorable results more efficiently.

6. Exploration of credit trading. Page 17 of the draft strategy mentions  credit trading under the section discussing the effectiveness of point source permitting. IPL is very supportive of the concept of a trading program and is open to further discussions in developing such a program.

IPL would encourage IDNR and IDALS to further involve point-source stakeholder input while developing a final strategy. IPL supports the creation of a stakeholder committee organization to assist in this process and would offer a representative if a stakeholder group is created.

IPL appreciates the opportunity to provide this input. If you have further questions, please contact me at (319) 786-4172.

Respectfully Submitted,

Tim A. Harden

Environmental Specialist II

Alliant Energy Corporate Services, Inc.

on behalf of Interstate Power and Light Company

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1236.

Timestamp 1/18/2013 2:02 PM

**Name** Chris Perdue

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Iowa farmers care about the land and water quality. They raise their families on farms and want to protect the quality of the water for future generations.

A science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices is needed at this time. I urge you to adequately fund the Iowa Nutrient Reduction Strategy. This reasonable and cost-effective strategy is a science and technology based approach used to encourage the adoption of voluntary conservation practices that will have the greatest benefit for water quality in the state. Chris Perdue

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1237**.

**Timestamp** 1/18/2013 2:06 PM

**Name** Stacy Young

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Secretary of Agriculture Northey,

I support the nutrient reduction strategy that has been talked about but only on a voluntary basis and I also think there should be a longer period for comments because we have only just started to hear about the program. Many of the meetings that will be happening throughout the state have not even occurred yet. Please also be mindful of the fact that when developing these new strategies that there is enough money to fund them adequately. We developed a waterway 2 years ago with a conservation program that was done with NRCS and we thank for helping us with that program. Let me know if I can be of any assistance. Stacy Young



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1238.

Timestamp 1/18/2013 2:07 PM

**Name** Eric & Stacie Johnson

**City** Cedar Rapids

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

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Voluntary reduction strategies, especially in rural Iowa, have been encouraged the early 1930s in Iowa through Soil and Water Conservation Districts. For argument sake, let's say 1940 - that means for SEVENTY-TWO YEARS we've funded and worked with farmers to reduce non-point source pollution! It is a sad state of affairs that we (Iowans) haven't figured out solutions that are both economical and environmentally safe during the course of 72 years! There are many things that can be done to reduce the amount of non-point source pollution in Iowa.

NUMBER ONE) DNR - get serious about enforcement! Regulatory agencies are not suppose to be anyone's friend - they are suppose to uphold the law. (The DNR reminds me of a parent that wants to be their child's "friend" - no good comes out of that parent / child relationship!) Start enforcing - there is no excuse any longer when it comes to the Clean Water Act. The Manchester Field Office had a grand total of two NPDES inspections during 2012 - TWO. Why? If I was a contractor or city - I know my chances of getting a visit by the DNR in the Manchester Field Office territory are pretty much nill with that inspection record.

2) The Department of Natural Resources should walk the walk. DNR owned land should actually incorporate water quality practices - either new projects or retrofits - that capture and infiltrate stormwater runoff. Any state park we visit is an example of what not to do - as the parking lots / roadways drain right into the body of water. Pleasant Creek in Palo is a great example of that as is Palisades near Mt. Vernon to name two.

3) Get serious about infiltration based practices- we have all this land, but "nowhere for rain to go." Field tile is fine - but daylight the tile into something that soaks up the runoff and cleans it up before releasing it to the closest body of water. The tile, like urban areas and storm drains, SHOULD NOT BE ALLOWED TO BE OUTLETED DIRECTLY INTO A BODY OF WATER, weather it is a creek, stream or river, under any circumstances - while its the easiest thing to do, it is just plain short-sighted and does not take into account the pollution that is being carried via the tile.

4) All cities in Iowa should have a basic stormwater ordinance that requires the infiltration of at least the one inch rain, as well as an erosion and sediment control guidelines for construction sites. ALL cities, not just NPDES permitted cities.

5) NO BUILDING IN THE 100 year FLOOD PLAIN on all USGS "blue line" streams and rivers in Iowa. Not only does that help reduce flooding, it will also keep pollutants away from the immediate drainage area of a body of water.

This is a start that will go a long way to reduce the nutrients, as well as the biologically pollutants that plague Iowa waterways.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1239.

Timestamp 1/18/2013 2:11 PM

Name Eric Euken

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

I would like to encourage you to support the voluntary Iowa Nutrient Reduction Strategy. With Iowa's many different soils and topography, not to mention the many different types of farms and farming practices, we need a flexible set of science based standards for conservation. A large "one size fits all" standard may work for a handful of farms but neglect many others.

It is my belief that farmers will act appropriately in terms of conservation because in the both the long and short run it will benefit them and everyone else in many ways.

In order for all of this to work and to begin the process it does need adequate funding. With that funding in place it will encourage the larger practices that otherwise can not be feasible.

On my farm alone, I have built and maintained waterways, put in additional windbreaks, and have implemented the use of a hoop building to limit nutrient runoff. I hope to do more in the way of grass buffer strips and building ponds in the future. Eric Euken

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1240**.

**Timestamp** 1/18/2013 2:13 PM

**Name** Mark Ogden

**City**

**State**

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

I am taking this opportunity to urge you to voice support for the Iowa Nutrient Reduction Strategy, and more importantly support funding for this important effort.

The Iowa Nutrient Reduction Strategy built around a science and technology based framework developed by teamwork from the Iowa Department of Agriculture and Land Stewardship, the Iowa DNR, and ISU College of Agriculture and Life Sciences. The goal is to assess and reduce nutrients to Iowa waters and the Gulf of Mexico, from both point and non-point sources in a cost effective manner backed by science and reason.

I personally support this effort, and know firsthand, the importance of voluntary conservation practices to support and maintain production on our farm. I installed a pond structure, with prairie, grass strip and riparian features to protect waters draining into the Clear Creek watershed that ultimately drain to the Iowa River and Mississippi. This was a voluntary, cost share effort that is already showing benefits, while maintaining the farms production viability. Continued funding of these programs is vital.

I look forward to your support on this issue. Mark Ogden

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1241**.

**Timestamp** 1/18/2013 2:14 PM

**Name** Elizabeth Garst

**City** Coon Rapids

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I am an Iowa farmer, and have utilized many conservation practices on a voluntary basis. However, I know that a voluntary approach is not sufficient, since we have been trying that method for decades, even as nutrient levels in water have increased. I see that some of my neighbors are bad actors. Iowa should make certain practices mandatory ... specifically we need buffers along streams and prohibition of anhydrous ammonia in the fall until soil temperature is below 50 degrees.

I agree that many practices are not universally appropriate (unlike the above), so it is also important that we move towards a results-based system, which includes extensive water testing at the field level.

The State of Iowa should establish numeric standards for nutrients.

The State of Iowa should adequately fund DNR manure management inspectors .... we need at least 20, not 2.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1242.

Timestamp 1/18/2013 2:16 PM

**Name** Clark Gaff

**City** Ames

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Relying on voluntary measures to reduce nutrient runoff has not worked in the past 40 or so years and it will not work in the future. The strategy as written is bad policy-it lacks timelines, benchmarks, and incentives for farmers to reduce pollution. DNR Pollution experts were not used to help write the strategy. Studies have been done by them to identify degraded waterways and it is generally known what needs to be done to reduce runoff. The studies suggested in your strategy are probably just a stalling tactic by the Farm Bureau. New technologies may be helpful but they can be developed along the way as needed. No need to delay cleaning our waterways any longer. The policy was written without oversight or input from the public and with too much input and oversight of the Farm Bureau. Farmers are not the only ones affected by polluted waters. We all need clean water to survive. The main point I want to make is that farmers have not voluntarily cleaned up their act and there is no reason to believe they will now. Our water is some of the most polluted in the nation and this is what you and the farm bureau come up with? We need stringent regulations and consequences for not following them.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1243**.

**Timestamp** 1/18/2013 2:18 PM

**Name** Tanner Rowe

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I would like you to know I support the voluntary conservation practices and science-based state nutrient reduction strategies. Also the need to maintain agricultural production.

I encourage you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's many other conservation cost share programs. The failure to fund these programs will delay many needed conservation projects.

I have used these programs to build terraces and buffer-strips on many of our farms. Without these programs it is not cost effective for us to do such projects. Tanner Rowe

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1244**.

**Timestamp** 1/18/2013 2:19 PM

**Name** Nathan Thoreson

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I strongly urge you to fund the Iowa Nutrient Reduction Strategy and other cost-share programs. In the past, the failure to fund programs such as these has delayed much needed conservation projects. Funding this program will not only make our state's environment better, but will maintain our proud heritage as a leader in agriculture production. Nathan Thoreson

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1245.

Timestamp 1/18/2013 2:24 PM

**Name** Rodney Sothman

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I support the conservation practices the farmers do on a volunteer basis. Most farmers try to do conservation practices but it cost a lot to do such a thing.

We need to keep our conservation going so we have good land to farm in the future. Rodney Sothman



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1246**.

**Timestamp** 1/18/2013 2:31 PM

**Name** Joseph Elmquist

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I would like to express my support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices. When something is science-based, there should be a greater voluntary response than if we are told to make drastic changes to our operation with no real evidence that what we are asked to change will improve the situation. I believe this is the best way to maintain agricultural production.

State lawmakers should adequately fund the Iowa Nutrient Reduction Strategy, as well as other state conservation cost-share programs.  
Joseph Elmquist

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1247.

Timestamp 1/18/2013 2:32 PM

**Name** Daniel Christensen

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

Voluntary conservation practices are very important and need to be maintained in ag production.

We, as agricultural professionals, need our legislative leaders to make sure there are enough funds for these voluntary conservation programs. Delaying the projects helps no one.

Thank you for taking the time to read my note. Daniel Christensen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1248**.

**Timestamp** 1/18/2013 2:34 PM

**Name** Dale Boelman

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

As a livestock farmer I feel we need to base the Iowa Nutrient Reduction Strategy using science based facts. I personally use grass strips and inject my manure Dale Boelman

**Name** Kevin Kirlin**City** West Des Moines**State** Iowa**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input checked="" type="checkbox"/>	<b>Point Source</b>

I am commenting on the policy considerations and strategy outlined in the Iowa Nutrient Reduction Strategy. I will begin with a brief description of my personal background.

I was born in Harrison County, grew up in Shelby County, was educated in Story and Johnson Counties, and have lived in central Iowa for most of the past 28 years. I am the descendant of farmers who emigrated to western Iowa in the latter half of the 19th Century and broke the prairie to grow crops and livestock. My grandfathers and my father were farmers. I still have uncles, aunts and cousins who run grain and livestock operations in western Iowa. As a child, I learned from my family about the efforts made during and after the Great Depression to terrace land and limit soil loss. As a university student and adult I have canoed rivers in central and northeast Iowa for recreation. As a parent and an adult scout leader I have taken children to Iowa parks, lakes and on Iowa rivers. I have had numerous opportunities to observe the conditions of Iowa waters, to explain to scouts and other children why lake beaches are closed due to high levels of fecal contamination and what precautions they should take to limit their exposure to infection and exposure to high levels of nitrogen, phosphorus, insecticide and herbicide runoff from farms.

I was an undergraduate university student when clean water standards were established by federal law more than 40 years ago. Since then, Iowa lakes and rivers have become increasingly contaminated by livestock waste, nitrogen and phosphorus runoff from farms, while many point sources of water pollution have been mitigated. In 2008 the EPA adopted the Gulf Hypoxia Action Plan. Each year since then the EPA has prepared annual operating plans identifying specific actions being taken by seven states in the Mississippi watershed, including Iowa, and federal agencies to implement the GHAP. For Iowa these actions included funding and implementation of watershed protection programs, the ISU Wetlands Nutrients and Water Management research initiative and agricultural producer education and outreach programs. In March 2011 the EPA recommended that states incorporate certain elements into statewide nutrient pollution management programs, including:

1. Development of programs to measure nitrogen and phosphorus pollution (N&P loads) contamination is all major Iowa watersheds, identifying major watersheds which collectively account for 80+ percent of the N&P loads delivered to the Mississippi watershed, and identifying priority sub-watersheds for N&P load reduction.
2. Establishing numerical goals for N&P load reduction goals based upon the best available physical, chemical, biological and treatment/control information from local, state and federal monitoring sources.
3. Ensuring effectiveness of point source permits.
4. Develop watershed-scale plans in agricultural areas to reduce N&P loads in partnership with Federal and State Agricultural partners, NGOs, private sector partners, landowners, and other stakeholders.
5. Identify how the State will use state, county and local government tools to assure N&P load reduction from communities not covered by municipal storm sewer systems.
6. Identify where and how each of the tools identified in sections 3, 4 and 5 will be used within targeted/priority sub-watersheds to assure reductions will occur; verify that load reduction practices are in place; establish baseline N&P loads in each targeted/priority sub-watershed, conduct ongoing sampling and analysis to provide regular seasonal measurement of N&P loads leaving the watershed, and monitor implementation of best management practices.
7. Annually report to the public on state websites the status of specific state programs and actions to reduce N&P loads in each targeted/priority sub-watershed, in an interactive process affording the public an opportunity for comment and feedback, for the purpose of improving implementation and collaboration to achieve N&P load reductions.
8. Develop a work plan and phased schedule for N&P criteria development for Iowa lakes and rivers containing interim milestones including, but not limited to, data collection and analysis, as well as N&P criteria proposal and adoption consistent with the Clean Water Act, for at least one class of Iowa waters within 3 - 5 years, and completion of criteria development in accordance with a "robust, state-specific workplan and phased schedule."

**Name** Kevin Kirlin**City** West Des Moines**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

The proposed Iowa Nutrient Reduction Strategy is Iowa's response to the GHAP and EPA's March 2011 recommendations. Thus, the proposed strategy must be measured against the criteria set forth in those documents. Contrary to the claims set forth in the executive summary of the proposed strategy it is not a new beginning in the State's efforts to assess and reduce N&P loads in Iowa waters. Instead it summarizes the history of minimally funded state conservation programs, incorporates the ISU study of point and nonpoint pollution sources, followed by vague and conclusory responses to the March 2011 EPA recommendations.

The proposed strategy says the Iowa Water Resources Coordinating Council (WRCC) will prioritize watersheds on a statewide basis and determine watershed goals "based upon a set of mutually agreed-to indicators" such as "soil and water indicators, crop performance indicators, economic indicators and social/cultural indicators." No timeline is provided or even discussed. There is no analysis of, or even any reference to, the best available physical, chemical, biological and treatment/control information available from local, state and federal monitoring sources.

Regarding point source pollution, and relying upon the ISU study, the proposed strategy notes that modification of existing wastewater treatment facilities has the potential to reduce their nitrogen discharge by 66% and phosphorus discharge by 75% and that, if this effort were fully successful, it would reduce nitrogen loads in Iowa waters by 4% and phosphorus discharge in Iowa waters by 16%. There is no discussion whatsoever of how or when these goals would be reached. The proposed strategy summarizes existing state regulation of animal feedlots, but contains no account of the numerous breaches of animal waste treatment facilities or resulting pollution of Iowa waters, contains no analysis of the efficacy of existing regulations, nor any process or timetable for evaluating or modifying these regulations. The proposed strategy states that state agencies will work to develop an "environmental credit trading program" in response to nine-year-old federal legislation in effect for the last nine years calling for states to develop a market for water pollution reduction credits. Once again, no discussion of timetable or process.

Regarding non-point pollution sources, the proposed study states a numerical goal of 41% N load reduction and 29% P load reduction. Based upon the prior statement that the maximum potential point source N&P load reduction would reduce overall N&P loads in Iowa waters by 4 and 16% respectively, it appears that the proposed strategy, if fully successful, would result in overall N&P load reductions in Iowa waters of 45%, or less than half of existing N&P loads in Iowa waters. There is no discussion of any basis, medical, scientific or otherwise, for the N&P load reduction goals set for non-point pollution sources, or why non-point pollution source reduction goals should be far lower than point pollution source goals, or why the overall N&P load reduction goals should be less than half the existing N&P loads in Iowa waters. In contrast to the discussion of the cost of point source compliance, there is no analysis or estimates of the financial costs required for agricultural producers or the State required to achieve even the modest goal established for non-point sources.

Regarding so-called minor pollution sources, the proposed strategy notes that Iowa has more than 300,000 private sewage disposal systems. Beyond a summary of existing state and local regulation and funding, no goals, timetables or funding estimates are provided with regard to minor POTWs.

Regarding accountability and verification measures, the State proposes to convene technical work groups beginning in 2013 "to define the process for providing a regular nutrient load estimate...based upon the ambient water quality data network." The State proposes to develop new and expanded frameworks to track progress beyond the existing ambient water quality monitoring networks. The State proposes to "encourage" expansion of geographic coverage and frequency of statistical surveys regarding adoption of nutrient reduction practices by agricultural producers. The State will "seek to develop new frameworks...to characterize farmer and landowner adoption of new technologies and practices that reduce nutrient transport to water from nonpoint sources." The WRCC will establish and refine a "public-private reporting system that documents current nutrient management and conservation system application within watersheds." This prompts one to wonder what the WRCC has been doing in the more than four years since it was created with regard to any of these matters. Once again, no discussion of time tables or fiscal analysis; no specifics as to how the WRCC will accomplish these objectives.

Regarding annual reporting goals, the State proposes a new DNR inventory of management practices, and annual reports by WRCC. Once again, no fiscal analysis or specifics as to how the WRCC will accomplish these objectives.

Regarding development of a 3 - 5 year state-wide plan with detailed phases for data collection and analysis, development of N&P criteria, development of N&P load reduction proposals, and implementation consistent with the Clean Water Act, the State promises that the DNR will review ISU research results regarding protection of Iowa lake aquatics communities, and the DNR will evaluate a site-specific nutrient stressor-response approach for stream nutrient goals as part of its existing triennial water quality standards review process. The State throws in a flow chart describing that process. No fiscal analysis or timetable for interim goals or an overall plan is discussed.

In summary, the proposed nutrient reduction strategy is a collection of mostly vague aspirational goals without discussion of, or commitment

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **3** of comment #**1249**.

**Timestamp** 1/18/2013 2:34 PM

**Name** Kevin Kirlin

**City** West Des Moines

**State** Iowa

**Providing comment on the following sections:**

<input checked="" type="checkbox"/> Executive Summary	<input checked="" type="checkbox"/> Nonpoint Source
<input checked="" type="checkbox"/> Policy	<input checked="" type="checkbox"/> Point Source

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to, any interim or overall detailed goals or timetables, lacking any technical or fiscal analysis regarding the implementation of any such strategy. Fiscal analysis of legislative bills in Iowa has been required for decades. Yet a document which purports to establish state-level policy on a highly complex issue such as water quality, which affects a public resource vital to our economy and our individual health and welfare, which requires the involvement of governmental agencies at multiple levels, private businesses, and public consumers over an extended period of time, lacks any such analysis.

We now know that the proposed strategy is the product of a process in which the Iowa DNR and Department of Agriculture outsourced the development of this policy to agricultural and commercial trade groups in violation of Iowa law regarding open records and agency action, while qualified public employees with technical expertise were deliberately kept out of the process. As a result of that process the proposed strategy represents the interests of those trade groups and not the interests of the overall public.

In light of the improper delegation of governmental functions to private trade groups, the lack of any meaningful technical or fiscal analysis by qualified and impartial persons or organizations, and the wholesale lack of responsiveness to the GHAP and the criteria set forth by the EPA in its March 2011 memo, I respectfully request that the agency set aside the proposed strategy and establish a task force including representatives of agricultural producers, private industry, local government, environmental organizations, individuals with scientific and technical expertise in wastewater treatment, soil nutrient treatment methods, with the goal of producing, within 12 months, a proposed nutrient reduction strategy for Iowa which is consistent with the Clean Water Act and responsive to the GHAP and EPA recommendations, and with adequate budget and staff to prepare fiscal and technical analyses necessary for the Iowa legislature and the public to evaluate the task force's recommendations in 2014.

Respectfully,

Kevin M. Kirlin

5104 Brookview Drive

West Des Moines, IA 50265

Email: kevin.kirlin@gmail.com

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1250**.

**Timestamp** 1/18/2013 2:37 PM

**Name** Brydon Kaster

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am writing to encourage you to support a science based nutrient reduction strategy for the state, that includes voluntary conservation practices and allows for farmers to maintain productivity. We need be sure that any program implemented is adequately funded as well as implemented in a timely manner. I think that these are resonable goals for this project. Brydon Kaster

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1251**.

**Timestamp** 1/18/2013 2:40 PM

**Name** Gary Stickler Jr

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

It is very important to support these conservation projects and research for farmers. Iowa and the present population are not the only affected parties hurt by nutrient runoff. The ever growing dead zone in the gulf is affecting fishermen and other water based industry. Sediment runoff continues to fill the Mississippi as well. What future do our children have in these areas if it continues. Even at home continued nonconservation will render our land useless. Please help support funding to continue funding and science based research so future generations can continue our way of life. Gary Stickler Jr



**Name** Francis Thicke**City** Fairfield**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

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The science assessment of nonpoint source practices in the Nutrient Reduction Strategy (NRS) is comprehensive. However, it reveals that major changes in Iowa's agricultural practices will be required to achieve the goals of the NRS. What is lacking in the NRS is a plausible strategy for how farmers will become motivated to make those changes.

The practices listed in the NRS are not new. Farmers have had the opportunity to adopt them for years, but for the most part they have not. The reason they haven't is that the practices cost money and/or time to implement. Farmers, individually, have no economic motivation to adopt them, and the public cannot afford to pay for them.

In 2012 USDA provided Iowa landowners \$33 million in conservation funding, the latest of decades of annual conservation funding that has not shown real gains in water quality. To the contrary, the Hypoxia Zone in the Gulf of Mexico has grown larger over the decades of state and federal funding of water quality programs and projects. Moreover, anyone driving around Iowa in recent years has seen firsthand that a lot of new tile drainage has been installed across Iowa, which will likely increase the loss of nitrogen to the Gulf faster than water quality projects can make gains. The proposed \$2.4 million state allocation to implement the NRS may sound like a lot to legislators and the public, but it is a drop in the bucket of funding that would be required if the public were to fund the NRS to a level that would have a chance of achieving its goals.

A water quality strategy that could work would be to require every farm to develop and implement a farm conservation plan which would include a combination of practices from the science assessment of the NRS, which together would meet the water quality goals for that farm, and which on the aggregate would meet the water quality goals for the State of Iowa. Motivation for farmers to develop and implement their conservation plans could be through coupling conservation plans to federal subsidy programs (obviously the state cannot control that) or through direct regulatory requirements at the state or federal level.

The voluntary strategy put forth in the NRS simply defies the odds of working. As one ISU scientist -- who contributed to the science assessment of the NRS -- recently told me, "There is no scientific evidence that the NRS strategy will work."

At best, the proposed voluntary approach espoused in the NRS represents a naïve belief that farmers will now suddenly make major changes in their farming practices -- which will cost them money -- in the face of decades of evidence to the contrary. At worst, the NRS strategy could be seen to be a calculated ploy to try to buy another five years of business-as-usual agriculture under the guise of a new strategy.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1253**.

**Timestamp** 1/18/2013 2:52 PM

**Name** Kathy Rohrig

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I urge you to fund the Iowa Nutrient Reduction Strategy.

What sets this plan apart it is science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. it is not the cookie cutter, every state is the same approach, that EPA wants to happen.

I think the voluntary portion is key. Farmers are making good conservation choices and don't want to bludgeoned with overwhelming and often unnecessary regulations.

Thank you in advance for your support. Kathy Rohrig

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1254**.

**Timestamp** 1/18/2013 2:53 PM

**Name** Eugene Shelton

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. A science-based nutrient reduction strategy is the most effective way to improve Iowa's conservation. I highly recommend that you support a science-based state nutrient reduction strategy. Eugene Shelton

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1255**.

**Timestamp** 1/18/2013 3:04 PM

**Name** Todd Boss

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Dear Sirs I am writing today to encourage your support of the Iowa nutrient reduction strategy. As you know most Iowa farmers do an excellent job of Nutrient conservation on their farms, adoption and funding of the Iowa nutrient strategy would give further incentive to producers to voluntarily implement more of these conservation practices without further statewide regulations. For example some of the voluntary practices I have implemented on my farm include crop rotation, use of green manure, use of the late spring nitrate test before sidedressing, buffer strips, and incorporating manure. Failure to support this initiative may result in more regulations in an already over regulated industry. Thanks Todd Boss

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1256**.

**Timestamp** 1/18/2013 3:05 PM

**Name** Kathleen Swenka

**City**

**State**

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

It is vital agricultural production is maintain to continue feeding our growing population. Food does not come from the grocery stores or local markets in comes from the backs of the dedicated farmers working for little pay.

Please keep conservation practices voluntary. Farmers have enough to deal with, last year's drought caused major issues raising livestock and raising a healthy and safe crop. There is a high probabilty we will experience another drought this year.

We reseed all of our water ways and creek banks after the 2008 floods washed them out. We spent months cleaning up debre left behind and moving down trees.

Our future goal is to hand over the farm to our sons, so they may experience the proudness feeding the world. For this reason soil production is vital.

Farmers understand their ground and resources needed to raise a healthy and safe crop better then any politican ever will. We have alot invested emotionally, physically and financially.

Thank-you

Kathy Swenka Kathleen Swenka

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1257.

Timestamp 1/18/2013 3:14 PM

**Name** John Pohlman

**City** Ames

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Water is one of our State's most valuable natural resources, all care should be given to its cleanliness and value.

A) The strategy needs to have specific goals to reduce the levels of nitrogen and phosphorous on our lakes and rivers. Will one percent improvement be good enough or will fifty percent improvement be enough?

B)The strategy mandates cleanliness requirements for some but lets others do improvements voluntarily. This is inherently unfair for all lowans. If agriculture is causing part of the nutrient overload, then agriculture needs to be part of the solution. Leaders may need to provide incentives.

lowan can fix our water problems and if we don't implement a good plan to do do so, the federal government take charge of our strategy. I do not think that is a proper answer to our state's water issues.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1258**.

**Timestamp** 1/18/2013 3:14 PM

**Name** Donna Buell

**City** Spirit Lake

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Please stop insulting our intelligence. Voluntary measures to be implemented by farmers have not worked for decades. And there is no basis for believing that they will now.

A workable water quality strategy would be to require every farm to develop and implement a farm conservation plan. The plan would include a combination of practices from the science assessment of the NRS. Motivation for farmers to develop and implement their conservation plans could be through coupling them to subsidy programs or through direct regulatory requirements.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1259.

Timestamp 1/18/2013 3:16 PM

**Name** Joe Helfenberger

**City** Ottumwa

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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While we think it is very important to move in the direction of nutrient reduction, it needs to be done with affordability in mind. The amount of time given each community to achieve point source reduction must take into consideration the community's ability to pay and the amount of money currently being spent on improvement of water quality. Iowa and other states affected along the Mississippi River basin need federal financial assistance to achieve compliance with nutrient standards.

Since the largest impact on nutrient reduction in the Mississippi River basin will come from non-point sources, there needs to be immediate emphasis on this approach. However, this approach absolutely needs federal financial help to be successful. Agricultural production is one of the few remaining areas that the United States is competitive with the rest of the world. There needs to be financial incentives for the agricultural producers to improve water quality.

A long-term plan to phase in improvements in both of these programs will be more successful than stringent requirements implemented over a short period of time. It would be extremely helpful to have a group representing the municipalities and a group representing agricultural interest meet regularly with the Iowa DNR to foster a team effort for long-term, effective reduction of pollution in our waterways.

I would be happy to be a part of a team that would begin to build a working network of people dedicated to achieving pollution reduction.

Joe Helfenberger

City of Ottumwa Administrator

(641) 683-0600

helfenberger@ci.ottumwa.ia.us



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1260**.

**Timestamp** 1/18/2013 3:24 PM

**Name** Kerry Gruenhagen

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I am writing you today to urge you to support the Iowa Nutrient Reduction Strategy as opposed to a one size fits all strategy by bureaucrats in DC. Every farm has different terrain, and different soil types that should be addressed separately to be truly effective.

Thank you for your time, and support. Kerry Gruenhagen

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1261.

Timestamp 1/18/2013 3:24 PM

**Name** Stacie Johnson

**City** Cedar Rapids

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Policy

Nonpoint Source

Point Source

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<http://www.americanrivers.org/newsroom/resources/permitting-green-infrastructure.html>

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1262**.

**Timestamp** 1/18/2013 3:36 PM

**Name** Russel Glade

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                               **Point Source**

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Secretary of Agriculture Northey,

I was very happy to see Iowa as a leader in developing a science-based strategy for reducing the amount of nutrients leaving the state in the water in our streams & rivers. In my farming operation, I have been using strategies similar to those recommended. I have not used full width tillage for over five years now, first with complete no-till, and now with strip-till ahead of the corn and no-till for the soybeans. I have also started a three-year program to put a cover crop on some of my fields in the fall. We will see how this affects our soils and the following year's crop. I put the majority of the nitrogen for my corn crop on in early summer, when the crop needs it most and will quickly take it out of the soil before it can be lost. My phosphorus and potassium fertilizers are now injected into the soil, where they are much less prone to being carried away by erosion.

I urge you as leaders and legislators to fund the Iowa Nutrient Reduction Strategy. We cannot let this initiative languish for lack of funding, causing the Federal EPA to come in at some later point and impose restrictions that will impair our ability to farm in an effective manner.

If you have any desire to use my experiences and knowledge in any way, I am always happy to share and promote the benefits of reduced tillage and proper nutrient management.

Thanks for your time. Russel Glade

**Name** Iowa League of Cities and Iowa**City** Des Moines**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

Comments Iowa League of Cities and Iowa Association of Municipal Utilities Iowa Nutrient Reduction Strategy 1/18/13

The Iowa League of Cities (League) which represents over 800 cities in Iowa of all sizes, wishes to comment on Iowa's proposed strategy for nutrient reduction aimed at helping achieve the goal set by the 2008 Gulf Hypoxia Action Plan to reduce nitrogen and phosphorus entering the Gulf of Mexico by 45 percent. These comments are also supported by the Iowa Association of Municipal Utilities.

The comments below are broken up into discussion of the point source strategy and the nonpoint source strategy. The League appreciates the work of the Iowa Department of Agriculture and Land Stewardship (IDALS) and particularly the Iowa Department of Natural Resources (DNR) in crafting this policy, and was pleased to have a stakeholder role in the outcome. The League also appreciates the additional time given by the extension of the comment period by two weeks, which was used to gather more input and to reach out to members who will be affected by the new strategy. The League has done its best during the comment period to educate its members and receive feedback on this complex and impactful proposed nutrient reduction strategy. The League hopes to continue to work with the Departments to ensure fair and affordable implementation of the State's nutrient reduction strategy.

#### Point Source Strategy

##### Cost/Affordability

A top concern of cities will be the affordability of implementation of the nutrient reduction strategy to achieve the goal of a 4 percent reduction in total nitrogen and a 16 percent reduction in total phosphorus discharged into Iowa waters by point sources. Each of the 102 major municipal facilities, targeted directly by the strategy, is uniquely situated and will be affected differently by the proposed nutrient strategy. Initial study phase of the strategy allows each municipality two years to complete a study that determines a preferred approach for meeting biological nutrient removal and another three years to negotiate construction timelines with DNR and plan necessary rate adjustments. Affordability will vary for actual on-the-ground implementation. Where one city may be able to upgrade an existing plant such as an activated sludge plant with less cost, another city with an aerated lagoon may struggle to fund infrastructure upgrades, and yet another may be unable to find funding to undertake the nutrient reduction feasibility study required to begin the point source process. It is important to note, that many cities have undertaken projects prior to this proposed strategy, which have required debt servicing and increased usage fees from users, so the ability of their citizens to absorb these costs will vary from community to community.

According to DNR estimates over the next 10 years, cities will be asked to invest at least \$1.5 billion and continue to incur operational costs of an estimated \$38 million per year (which may have omitted additional costs due to increased cost of solids handling and storage). This is no small investment for cities, and ultimately, no small impact to the 1.6 million ratepayers who will foot the bill. The strategy also points to smaller communities (not in the 102) having to evaluate nitrogen and phosphorus through the State's antidegradation process, which could also add unknown/unquantified costs to those communities. It will be important for cities to individually evaluate affordability and to potentially utilize Iowa's Disadvantaged Community Law and rules if necessary, when costs are unreasonable for their community. The League would like examples of how affordability for various cities will be determined, and clarification on whether additional costs due to solids handling and storage may be incurred, as well as what costs may affect cities outside of the 102 through the antidegradation process.

Cities understand that DNR has recognized state law prohibiting increasingly restrictive nitrogen and phosphorus limits for 10 years after completion of the construction process; however, most loans for infrastructure recognizing the "useful life" of the facility normally have terms of 20 years. Under the existing scenario, a city could be required to upgrade its facility again at additional cost (even if the city is still paying off a loan for previous upgrades) after just 10 years. The League urges DNR to carefully assess and address forcing any additional upgrades in any case such as this through the strategy, and look at total costs of the initial project and additional costs that may be required as a whole, instead of as individual projects-- particularly when the city has addressed the options in its initial study.

##### Benefits

The technology-based approach suggested in the strategy is preferable to alternatives, such as setting numeric water quality standards, for several reasons. First, cities will benefit from the "home rule" aspects of the proposed point source strategy. As mentioned above, each city is uniquely situated, and a one-size-fits-all approach would not be effective nor desirable. The flexibilities included in the strategy for cities to help determine the preferred and most affordable technology that best fits their community's needs are key to making the strategy function. The inclusion of annual versus daily limits will also enable cities to efficiently meet requirements throughout the year in a more cost-effective manner, and is an important part of the strategy. The League also understands "based on the strategy proposal" and supports that specific stormwater reduction targets will not be set. Stormwater loading is extremely minor in comparison to agricultural sources and nitrogen control, in particular is difficult and very expensive to obtain in stormwater. (The League would like clarification on the interface between the strategy and stormwater permits.) Overall, the proposed technology based approach, is preferable to the imposition of stringent and unrealistic numeric criteria, that would not have a sufficient scientific basis or consideration of serious economic impacts.

**Name** Iowa League of Cities and Iowa**City** Des Moines**State** Iowa**Providing comment on the following sections:** Executive Summary Nonpoint Source Policy Point Source

#### Funding (Federal/State)

It is unclear how this point source strategy can be implemented without adequate funding from the state and federal level. If this is a federal goal, the State should aggressively seek federal funding to help implement the strategy. The only option that exists for cities for financing upgrades is the State Revolving Loan Fund. The State has not allocated any additional grants or funding sources to help lower the cost of this strategy to communities, nor are there any identified federal resources. The full cost for achieving the strategy goals, will ultimately fall on ratepayers in these cities. More specifics on obtaining additional funding or funding sources for planning and technological upgrades should be an integral part of the strategy, particularly because municipal ratepayers may be commercial or industrial partners that could be adversely impacted by significant rate increases associated with nutrient controls and choose to locate operations outside the State of Iowa.

#### DNR Response to EPA Comments

The League has concerns about the impact of EPA's recent comments (January 9, 2013 letter from Karl Brooks) on Iowa's proposed strategy, and would like clarification on several points from DNR in light of these comments. First, EPA directs the DNR to revise strategy language to clarify that schedules of compliance will not be used for meeting technology-based effluent limits. It is the League's understanding that schedules of compliance will not be used to enforce the point source strategy. Instead, construction schedules will be worked on by cities with DNR and enforceable at the state level by DNR. Second, EPA states: "Unless impracticable within the meaning of 40 CFR 122.45(d), monthly and short-term permit limits, based upon annual limits, would be required in National Pollutant Discharge Elimination System permits. This seems to fly in the face of the annual limit in the strategy. Clarification on how this will be implemented while maintaining the annual limit is needed. Finally, EPA states that clarification should be included that there may be exceptions to the 10-year moratorium where water-quality based nutrient effluent limits could be added to permits, per the regulations, if a Total Maximum Daily Load with nutrient wasteload allocations is established, or if nutrient criteria are promulgated by IDNR. The League is concerned with this statement, and would like DNR to explain how they will respond to this comment, or what changes to the strategy might be made. The League strongly supports the 10-year moratorium.

#### Non-point Source Strategy

Cities contribute an estimated 8 percent of total nitrogen and 20 percent of total phosphorous entering Iowa waterways, while non-point sources contribute 92 percent of total nitrogen and 80 percent of total phosphorous. This is a stark difference, and one that cannot be ignored. It is vital for nonpoint source contributors to participate in the reduction strategy to achieve the proposed 41 percent reduction in nitrogen and a 29 percent reduction in total phosphorous. While cities will be forced to complete studies, finance technology upgrades, maintain new technology and do it all on a construction schedule built into their NPDES permits, the non-point source strategy is a voluntary approach with few measureable standards and a less clear implementation strategy. Some additional clarity is necessary, including development of nonpoint source milestones, field monitoring of practices installed by landowners/farmers, and transparent reporting on milestone progress with strong oversight by the WRCC in close partnership with key contributors IDALS and DNR.

#### Education to Individual landowner/farmer Level

It is unclear from the strategy how education on the nutrient reduction strategy and the Nonpoint Source Science Assessment will reach 90,000 individual farmers or landowners, some of whom are out-of-state. Will IDALS do this? Will farm stakeholder groups? How will grassroots participation be encouraged and measured? How will individual farmers determine which practices can achieve the best/most cost effective results for their land? Clearly, this cannot be done by leaders of some farm stakeholder groups or crop specialists, alone. This complex strategy must not only be understood, but also embraced by individuals in order to achieve significant reductions. The strategy should outline how this educational effort will be systematically achieved, measured, and implemented.

#### Additional Goals: Increase Oversight and Transparency

The nonpoint strategy mentions a long term goal for nutrient reductions, but the League believes additional, more specific goals to increase oversight and transparency should be included. A goal for establishing baseline conditions of existing land practices must be set and attained before the use of the Nonpoint Source Science Assessment will be effective. For measurement and reporting to be transparent and understandable a baseline must first exist. An aggressive goal for accomplishing this baseline assessment and establishment should be set in the strategy.

Methods for measurement of changes to the baseline and clear criteria for reporting must also be spelled out in the strategy. It is of paramount importance that reporting and measurement of nonpoint source progress must be robust and transparent. Reports should include changes to land practices and corresponding nutrient reductions or additions. Verifiable load reductions should be included in the strategy as well as a schedule and method for reporting, so it is clear when reports can be expected. Who will report this information? To whom? Will it be posted

**Name** Iowa League of Cities and Iowa**City** Des Moines**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

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for the public to examine?

A process to connect critical watershed assessments with available funding options and programs should be included in the strategy. Only then can resources be used most efficiently. Although it will take the participation of all non-point sources in the strategy, resources for nonpoint source nutrient strategy implementation should be targeted in such a way to achieve the greatest nutrient reduction for the dollar. How will current funding options or oversight, that are typically allocated or managed on a county or regional level, be re-focused on critical watersheds? IDALS has requested funding to start the process. Water Resources Coordinating Council (WRCC) is to have a significant role in the prioritization of watersheds where the most significant load reductions can be achieved. The intersection of funding and the most bang for the buck on the nonpoint source side is not addressed in the strategy at that level, it is only discussed for specific farm practices. A connection between funding and priority setting to achieve load reductions should be included in the strategy.

#### Role of WRCC

The strategy outlines a significant and important role for the WRCC in implementation of the non-point source strategy. In order to carry out the duties outlined, including watershed prioritization, setting baselines and reporting data and progress, the WRCC will need significant technical support, strong leadership and adequate funding.

#### Other

##### Working with Other States

Iowa's strategy should not be formulated or executed in a vacuum. Iowa should work with other states that also impact the outcome of the goal to reduce Gulf hypoxia, and be at the forefront of strategies that may be implemented on a multi-state basis. This is critical because many Iowa municipalities are home to food processing, bio-tech, and other ag-based industrial ratepayers that have facilities located elsewhere in this region and other states should not gain a competitive cost advantage while Iowa pursues this strategy. In addition, although it is not addressed in the strategy, if nutrient trading on a state or interstate level is discussed, the League would like to be part of this discussion working cooperatively with nonpoint sources on cost effectively reducing nutrient loads.

In summary, the League of Cities and the Iowa Association of Municipal Utilities respectfully request clarification on the following issues:

#### A. Point Source Strategy

##### 1. Cost/Affordability

- a. How will affordability be evaluated or determined? Would DNR provide examples?
- b. Would DNR consider extending the timeline for additional facility upgrades after nutrient controls are installed?
- c. Have costs for additional solids handling and storage been considered? If not, what are those estimated costs?
- d. What are estimated/potential costs for cities outside of the 102 major municipals affected by the nutrient reduction strategy through the implementation of Iowa's antidegradation policy?
- e. Would DNR clarify that stormwater limits will not be set for nutrients, and describe more clearly how MS4 permits factor in to the strategy?
- f. Will DNR and other Nutrient Strategy partners support a system of grants or other public funding options to supplement ratepayer contributions to implement the point source strategy?
- g. Is the League's understanding that schedules of compliance will not be used to enforce the point source strategy. Instead, construction schedules will be worked on by cities with DNR and enforceable at the state level by DNR correct?
- h. Would DNR clarify how short term limits will be implemented while maintaining the annual limit?
- i. How will DNR respond to EPA's comment on the 10-year moratorium? What changes to the strategy might be made? What circumstances could result in a city not falling under the 10-year moratorium?

#### B. Nonpoint source strategy

##### 1. Additional Goals: Oversight/Transparency

- a. How will education about the nonpoint source strategy to the individual farmer/landowner level be accomplished and measured?

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **4** of comment #**1263**.

**Timestamp** 1/18/2013 3:40 PM

**Name** Iowa League of Cities and Iowa

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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b. How will WRCC ensure nonpoint source practices are documented, adopted, managed, and maintained?

c. Would IDALS add clarity and specificity to the reporting process in the strategy? How will reporting on nonpoint source implementation be transparent and who will be accountable for the reporting?

d. How soon can a baseline be determined? Would IDALS include this in the strategy?

e. Would IDALS include in the strategy a process to connect critical watershed assessments with available funding options and programs?

f. Does WRCC have sufficient resources and authority to lead and implement the strategy?

2. Regional Impacts

a. How will Iowa (and EPA) ensure that no other states gain a competitive cost advantage as a result of pursuing this strategy?

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1264**.

**Timestamp** 1/18/2013 3:41 PM

**Name** Dawn Driscoll

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Please support a science-based state nutrient reduction strategy and recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. Dawn Driscoll



**Name** Richard Francisco**City****State****Providing comment on the following sections:****Executive Summary****Nonpoint Source****Policy****Point Source**

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Secretary of Agriculture Northey,

I am more fortunate than many since my position on the Iowa Natural Resources Commission allowed me to be briefed and question the IDNR, IDALS and ISU staff who lead the teams who wrote the proposed plan. Iowa leads the nation in having the science background to write this plan. This knowledge has shown that practices that work in some of the state's soils don't in others. This is because the problems vary around the state. In southern Iowa's drift plain soils, where we farm, nitrogen is not a problem but phosphorus is, so solutions are different.

We are also still learning what works and what doesn't work. It is important that the program be voluntary and even better incentivized. In many cases producers as well as the professionals have come up with new ideas that work better than the known ideas. An example would be designing buffer strips to the contours in the drainage. Using a "fixed" width often leaves portions with no runoff buffered while areas where most of the runoff occurs is inadequately buffered. This was observed by producers trying to work with the current fixed buffer width riparian CRP program. Requiring practices at this stage of our knowledge of what works and how well will be an inadequate feel good requirement that will fail and also lose producer support which is strong in Iowa.

Adequate funding is essential to increase the practices placed on the land and the science data collection necessary to measure its success. Most producers are interested in maintaining their soil since they realize it is the largest single investment on their farm. My own farm has a riparian CRP buffer, a wetland/wildlife CRP and a Grassland CRP program that are helping to correct a previous owner's unknowing mismanagement. Which is another reason the plan must have adequate funding in the Education section. Most producers need to know what practices they need to use to protect their soil. Which will also protect the downstream users and the Gulf.

Thank you for taking the time to read my opinion and supporting the voluntary science based plan created by the professionals and producers closest and most knowledgeable about the problem. Richard Francisco

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1266**.

**Timestamp** 1/18/2013 3:51 PM

**Name** Darrell Haack

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Please adequately fund the Iowa Nutrient Reduction Strategy and other cost share conservation practices. It is important to look at this as a scientific study for the importance of agriculture. Some of the things I have implemented for my farm has been soil sampling to reduce the amount of fertilizer where it doesn't need it, and have also went 100% no-till to prevent soil erosion. I am also considering seeding cover crops in the future as well. This is all to benefit my farm and the environment as well. Darrell Haack

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1267.

Timestamp 1/18/2013 3:52 PM

**Name** Keith Braun

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I totally support the I.D.A.L.S. Strategy of voluntary conservation practices and the need to maintain agriculture production. Keith Braun

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1268.

Timestamp 1/18/2013 3:53 PM

**Name** Tricia McKenney

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I believe Iowa should support, as I do, a science-based state nutrient reduction strategy. Relying on facts is always better than relying on emotion.

Voluntary conservation practices are flexible enough to get the best results on a farm to farm basis and consider individual topography needs.

When fully funded, voluntary conservation practices have been proven to be widely accepted and adopted by farmers. On our own farm we have terraces and field borders. We practice no-till planting, soil-sampling on grids, injecting nutrients to reduce run-off, and use structures to contain animal waste to keep it from contaminating soil and water. We have used state cost share and EQUIP funds to help implement these practices. Tricia McKenney

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1269**.

**Timestamp** 1/18/2013 3:57 PM

**Name** Donald Armstrong

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Please adequately fund the Iowa Nutrient Reduction Strategy, as well as the State's other conservation cost-share programs. Donald Armstrong

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1270**.

**Timestamp** 1/18/2013 3:58 PM

**Name** James Boyer

**City**

**State**

**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

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Secretary of Agriculture Northey,

I am writing to you today to express my support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

Though we do already use conservation practices on our operation, such as injecting our hog manure on our fields, and conservation tillage. I believe that we have a responsibility to lessen the impact that production agriculture has on our environment. I am looking forward to working with IDNR & IDALS to achieve this plan. James Boyer

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1271.

Timestamp 1/18/2013 4:00 PM

**Name** Clarence Miller

**City**

**State**

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Secretary of Agriculture Northey,

I am writing in support of the Iowa Nutrient Reduction Strategy and feel that this program should be funded. We work with several groups to continue volunteer conservation practices and will continue to do so without the EPA and other "big guys" making mandates.

Farmers take care of their land, the water and the air. It is in our best interest to do so also. Clarence Miller

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1272.

Timestamp 1/18/2013 4:02 PM

Name Ben Koellner

City

State

Providing comment on the following sections:

<input checked="" type="checkbox"/>	Executive Summary	<input type="checkbox"/>	Nonpoint Source
<input checked="" type="checkbox"/>	Policy	<input type="checkbox"/>	Point Source

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Secretary of Agriculture Northey,

I am asking for your support of the Iowa Nutrient Reduction Strategy.

The strategy is a science and technology based approach developed by the Iowa Department of Agriculture and Land Stewardship (IDALS), the Iowa Department of Natural Resources (DNR), and Iowa State University (ISU) to encourage the adoption of voluntary conservation practices that will have the greatest benefit for water quality in the state. It uses ISU research to determine which practices are most effective when applied to Iowa's unique landscapes. The strategy outlines these efforts in a scientific, reasonable and cost-effective manner, an approach supported by Farm Bureau members.

Some groups and individuals are already saying the Iowa Nutrient Reduction Strategy won't work. They believe voluntary conservation practices on farms do very little to protect water. They're calling for more regulation of farms, similar to the costly one-size-fits-all regulations imposed on farmers in the Chesapeake Bay area.

Farmers such as myself know better! We want to continue to be part of the solution, but we know that new regulations aren't the answer.  
Ben Koellner



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1273.

Timestamp 1/18/2013 4:05 PM

**Name** James R. Rasmussen on Behalf of

**City** Ankeny

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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January 17, 2013

Nutrient Reduction Strategy

ANR Program Services

2101 Agronomy Hall

Ames, Iowa 50011-1010

Director Chuck Gipp

Iowa Department of Natural Resources

Secretary Bill Northey

Iowa Department of Agriculture and Land Stewardship

Wallace State Office Building

502 East 9th Street

Des Moines, IA 50319-0034

RE: Iowa Nutrient Reduction Strategy

Dear Director Gipp and Secretary Northey:

The Iowa Water Environment Association (IAWEA) is an organization of professionals committed to the education and advancement of water quality and water pollution control techniques. The 600 plus members consist of educators, operators, engineers, regulators, municipal officials, manufacturers and equipment suppliers, contractors, and students. The Iowa Water Environment Association is an affiliate of the Water Environment Federation (WEF), an international not-for-profit organization dedicated to the preservation and enhancement of water quality throughout the world.

IAWEA supports the Iowa Nutrient Reduction Strategy concepts. Although the point source strategy will result in significant increases in costs of wastewater treatment for our major treatment facilities with relatively minor impacts on the total annual Iowa nitrogen loads, IAWEA recognizes the importance of working with nonpoint sources in reducing the total nutrient loads from all sources.

Some wastewater treatment facilities in Iowa have already installed nutrient reduction processes. Other are planning and constructing plant modifications for nutrient removal. Some have designed plants that include the ability to modify their plants for installation of nutrient removal processes.

Our members are concerned that the nonpoint source strategy is implemented and significant reductions in nutrient loads from nonpoint sources are achieved. As the strategy clearly illustrates, the point source contribution to Iowa's annual nitrogen and phosphorus load to the Gulf of Mexico is relatively insignificant as compared to the nonpoint source load. We are concerned that after expenditure of about \$1.0 billion dollars in wastewater treatment facility improvements, there will not be a significant reduction in total nutrient loads unless the nonpoint source loads are reduced.

We encourage the Iowa Department of Agriculture and Land Stewardship (IDALS) to aggressively lead the Water Resources Coordinating

**Name** James R. Rasmussen on Behalf of**City** Ankeny**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

Council (WRCC) in developing policies and incentives for implementing the nonpoint source practices for reducing nutrient loads. The Iowa Science Assessment of Nonpoint Sources is an excellent tool and reference for developing policies for targeting any public funds toward the most cost effective projects. We commend IDALS for basing the implementation strategy on economically efficient policies and directing public funds and incentives to areas and projects that provide the greatest reductions in nutrient loads at the least cost.

We request that the strategy include a requirement for the WRCC to develop a schedule with specific nutrient reduction goals within one year and update the schedule annually.

We encourage IDNR to investigate the feasibility for a nutrient credit trading program whereby one nutrient discharge source can purchase credits from another source that implements nutrient reduction practices in lieu of constructing expensive treatment plant modifications for achieving extremely stringent nutrient discharge limits.

It is critical that a good scientific based nutrient load monitoring program be developed by IDNR in 2013 and that adequate resources are allocated to in-stream water quality monitoring and documentation of agricultural land management practices. It is essential that we start with good baseline nutrient load data and that we accurately monitor our progress with nutrient load reduction as we implement the strategy.

We encourage IDALS and IDNR management to work with the WRCC in evaluating the question of whom ultimately should bear the costs of nutrient reduction strategy implementation. We realize that implementation of several of the nonpoint source strategy practices will increase the operating costs for farmers. This may ultimately result in higher food prices. Some of the practices such as wetlands will result in benefits to sportsmen due to increase in wildlife habitat. Therefore, it seems appropriate that State and Federal public funds be allocated for financing a portion of the nonpoint source implementation. For example, perhaps the Farm Bill could include provisions for funding nutrient reduction activities. Likewise, it is appropriate to allocate public funds for financing a portion of the point source costs.

We encourage the WRCC to routinely, at least annually, review and update the nutrient reduction strategy. This is a dynamic process and the document must be updated to reflect policy developments and new technical information.

Because the Nutrient Strategy compels WRCC and State of Iowa development of new nutrient control options and land management practices in partnership with all sources involved in this effort, it is imperative that legal mandates are clear that will allow the State and its agencies authority to make financial commitments for distribution of public funds that may be very different than current procedures. Drainage districts, school districts, sewer districts and 28E agreement organizations are a few examples of authorities that have legal authority to tax, sell bonds, develop budgets and have boards where the membership is scripted.

We encourage IDNR and IDALS to work cooperatively on the nutrient issue. Both agencies have talented staff. We encourage you, as leaders of your departments, to promote a cooperative working relationship between your staff in an effort to achieve the nutrient reduction strategy goal of 45% reduction in Iowa's nutrient load to the Gulf of Mexico.

In summary, we request the following revisions to the draft Nutrient Reduction Strategy and implementation details:

1.IDALS should aggressively direct the WRCC to develop policies and incentives for implementing practices that reduce nonpoint source loads.

2.IDNR should investigate a nutrient credit trading program.

3.IDNR must review the methods used for estimating the base nutrient loads and develop a good scientific based in-stream water quality monitoring program in 2013. Adequate resources must be allocated to the monitoring program.

4.Add a requirement for WRCC to develop a schedule with specific nutrient mass reduction goals within one year and update the schedule annually.

## Iowa Nutrient Reduction Strategy

Online comment submissions

Page **3** of comment #**1273**.

**Timestamp** 1/18/2013 4:05 PM

**Name** James R. Rasmussen on Behalf of

**City** Ankeny

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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5.WRCC should evaluate the question of who should ultimately bear the costs of nonpoint source and point source nutrient load reduction and develop a plan for requesting public funds and financial incentives for implementation of nutrient reduction practices.

6.WRCC should review and update the Nutrient Reduction Strategy annually.

7.IDNR and IDALS staff should work cooperatively on the nutrient issues.

We look forward to assisting IDNR and IDALS in the implementation of the nutrient reduction strategy. IAWEA members have assisted IDNR on past projects with state wide special stream and effluent monitoring programs. We realize the importance of good data in the decision making process and we will assist IDNR staff in this effort if possible.

Sincerely,

IOWA WATER ENVIRONMENT ASSOCIATION

James R. Rasmussen, P.E.

President

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1274**.

**Timestamp** 1/18/2013 4:11 PM

**Name** Lyle Krueger

**City** Cedar Falls

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Our primary concerns are:

1. That a strategy is developed that EPA will approve that will allow DNR to retain primacy over the NPDES program. Is losing primacy a risk?
2. That there be reasonable timetables for incorporating changes. Preserve/observe a 10 year moratorium policy.
3. Related to number 2 above, funding is a big issue for the smaller major municipal point sources. It's commendable that the strategy is intended to achieve the most "bang for the buck." Cedar Falls is completing a major construction project (\$19 million) and adding a BNR system to a fixed film trickling filter plant would cost the city an additional \$18 million at a minimum, by current engineering estimates and essentially double our debt load. Can there be a top down approach to removing the necessary nutrient loadings? Can the desired total mass reductions be accomplished by focusing on the biggest five or 10 POTWs as opposed to trying to squeeze drastically smaller amounts of nutrients from all 102 of the major municipals?

Thank you for considering this input. I don't envy your job of having to work through all of this.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1275**.

**Timestamp** 1/18/2013 4:12 PM

**Name** David Carter

**City** Ames

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Agriculture in our state occupies a premier place in the economy and in the ecology. Depending on volunteers to provide conservation of water resources at their own expense is like depending on volunteers to provide our tax revenues. The state government should first provide funding for enforcement, research and assistance. Secondly, provide education on the true and long term consequence of conservation versus short term exploitation of our fundamental resource, water. The draft plan is an insult to educated citizens and a clear concession to short term economic gain by corporate agriculture interests.

**Name** Roger Wolf**City** Ankeny**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

Comments on Iowa Nutrient Reduction Strategy

By the Iowa Soybean Association

To: Terry E. Branstad, Iowa Governor  
Bill Northey, Iowa Department of Agriculture and Land Stewardship  
Charles Gipp, Director, Iowa Department of Natural Resources

Dear Governor Branstad, Secretary Northey, and Director Gipp,

The Iowa Soybean Association (ISA) appreciates this opportunity to comment on the "Iowa Nutrient Reduction Strategy (INRS)" issued in November 2012.

The ISA expands opportunities and delivers results for Iowa soybean farmers and their customers. We create and implement strategic and innovative programs in the areas of renewable fuels, environmental stewardship, production and research, international marketing, agricultural awareness, transportation and soy foods. As one of the primary stakeholders that is affected and also is responsible for engaging in its implementation, we take the INRS very seriously.

The ISA is enthusiastic about the future for Iowa and beyond our borders to do this business right. We have been a leader and an advocate for redefining farmer leadership on nutrient and water quality issues for decades and stand ready to assist in the future.

We support development and implementation of a robust and unified INRS as a priority for ensuring a future that has Strong Soils and Safe Water. We are pleased to see the inclusion of both point source and nonpoint source communities in a comprehensive strategy along with the science assessment accounting for the costs and performance of various practices. Our view is that the Water Resources Coordinating Council makes logical sense to be the governing entity to oversee the multi-faceted operational planning and implementation of the INRS. We believe the INRS has the correct approach. Iowans have never had access to a strategy such as this.

ISA supports locally-based watershed management strategies to solve water management challenges. As an industry, we expect to increase efficiency and effectiveness of our management, while also deploying strategies and practices that will avoid, trap, treat and capture nutrients that would otherwise be lost from the landscape system.

While the INRS science assessment is a good first step, there are significant limitations that are understandable and apparent given the current state of land use and management data researchers have access to. Coupled with this is the fact that cost-effective measures perform differently across different watersheds. For the strategy to work, stakeholders in priority watersheds/landforms must gain a good knowledge of their watersheds before adopting any control policies. Targeting different pollutants will mean different land use options. As the strategy is communicated to the public this will be important for stakeholders to understand. Many stakeholders don't understand the complexity of the landscape and the fact that not all practices will yield improvements as others is an important distinction and challenge. The INRS has the foundation to support dissemination of this information. Future strategies will need to build the research and science base to support accountability measures and management capacity. We must get better at prioritizing strategies at multiple scales, locally and at the state level.

**Recommendations**

- Focus first on communications and education as stakeholders across Iowa need to understand the strategy and engage on developing operational plans.
- Continue implementation and alignment of programs and projects, leveraging the investments of public and private support.
- Continue use of the Water Resources Coordinating Council and Watershed Planning Advisory Council as a way to develop, coordinate and review implementation strategies.
- Find ways to improve collection and analysis of land use and management data, improving both accountability for measuring progress and also management optimization.
- Avoid best practice mandates on farmers. Nutrient mitigation practices and programs should be voluntary and market-driven and customized to suit the conditions and opportunities the watershed/landscape provides.
- We urge legislature funding to support coordination and implementation of the INRS.

Thank you for your time and consideration.

Sincerely,

Roger R Wolf, Director of Environmental Programs and Services, Iowa Soybean Association, Tel: 515-334-1051, email [rwolf@iasoybeans.com](mailto:rwolf@iasoybeans.com)

**Name** Jennifer McIvor**City** Urbandale**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

January 18, 2013

Mr. Chuck Gipp, Director  
Iowa Department of Natural Resources  
Wallace State Office Building  
502 East 9th Street  
Des Moines, Iowa 50319

Mr. Bill Northey, Secretary  
Iowa Department of Agriculture and Land Stewardship  
Wallace State Office Building  
502 East 9th Street  
Des Moines, Iowa 50319

Submitted via website.

Re: Comments of MidAmerican Energy Company on the Iowa Nutrient Reduction Strategy

Dear Mr. Gipp and Mr. Northey:

Headquartered in Des Moines, Iowa, MidAmerican Energy Company ("MidAmerican") provides natural gas and electric service to 729,844 customers in a 10,600-square mile area in Iowa, Illinois, South Dakota and Nebraska. As part of the company's diverse electric generation portfolio, MidAmerican operates six electric generating stations with National Pollutant Discharge Elimination System ("NPDES") wastewater permits in Iowa. MidAmerican believes responsible environmental management is good business. It benefits our customers and improves the quality of the environment in which we live. MidAmerican supports the goal of reducing nutrient loading to Iowa's lakes and streams and applauds the efforts of your agencies to develop a comprehensive strategy that addresses both point and nonpoint discharges of nutrients. MidAmerican appreciates the opportunity to submit comments on the Iowa Nutrient Reduction Strategy ("NRS"). This strategy has the potential to affect operations at a number of MidAmerican's permitted facilities and we respectfully submit the following comments:

#### Section 1 Policy Considerations and Strategy

The NRS refers to a U.S. Environmental Protection Agency ("EPA") document entitled "Working in Partnership with States to Address Phosphorus and Nitrogen Pollution through Use of a framework for State Nutrient Reductions" used in development of the strategy. While this document includes eight elements of a state framework, it appears many of the elements were only partially incorporated into Iowa's strategy. MidAmerican encourages your agencies to accept the EPA's offer of assistance to develop a more robust nutrient reduction strategy and to afford additional periods for public review and comment as this strategy takes shape.

Many of the elements within the EPA strategy framework depend on prioritizing watersheds, including the following:

- Setting load reduction goals – Measurable, numeric reduction goals should be tailored to each watershed, focusing on those with the heaviest loading.
- Ensuring effectiveness of point source permits – Reduction should be based both on the prioritization of watersheds and should then target the heaviest loads.
- Agricultural areas – Without prioritizing watersheds/sub-watersheds, it is difficult to determine the best locations for pilot projects, demonstration projects, or getting the best return on investment.

Rather than prioritizing watersheds as part of the strategy development, the Iowa strategy currently defers the prioritization process to some point in the future without identifying a timeline or process to complete this prioritization. MidAmerican believes that a more efficient nutrient reduction strategy can be implemented by first prioritizing watersheds with the highest nutrient loads and then working with point and nonpoint discharges within those watersheds to achieve nutrient reductions. An appropriate starting point would be Iowa's 2004 nutrient budget, which was developed by your two departments.

Finally, the document refers to the strategy as an outline of voluntary efforts to reduce nutrients. MidAmerican believes the characterization of the strategy as wholly voluntary is inappropriate, especially as applied to point sources. The draft strategy contemplates incorporating total nitrogen ("TN") and total phosphorus ("TP") effluent limits into NPDES permits for point sources. Once limits are incorporated into NPDES permits, the voluntary nature of the strategy ends and the nutrient reduction strategy becomes enforceable in point-source discharge wastewater permits.

MidAmerican encourages IDNR and IDALS to take advantage of the stakeholder group framework in developing of the final version of the NRS. MidAmerican believes that the use of this open and transparent framework will allow for greater buy-in and possibility of success for the final strategy.

#### Section 2: Non-Point Sources

MidAmerican believes that a successful approach to reducing nutrient loading in Iowa waters will take a reasonable, realistic, and balanced approach. MidAmerican also understands that IDNR and IDALS do not legislate, but must work within legislative direction.

In a recently released Iowa State University report entitled "Historic Water Quality Conditions in Iowa Natural Lakes," the analysis concluded

**Name** Jennifer McIvor**City** Urbandale**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

that the rate of sediment accumulation in Iowa lakes is accelerating. (Heathcote, A. J., Filstrup, C. T., & Downing, J. A. (2012). Historic Water Quality Conditions in Iowa Natural Lakes. Iowa State University, Department of Ecology, Evolution, and Organismal Biology, Ames, Iowa.) The report found that the time period this accumulation began accelerating coincides with the start of industrial agriculture in the 1940s-1950s. It is clear that existing conservation voluntary programs to treat agricultural runoff are not reducing nutrient runoff. Rather than relying on the status quo and extending current policies, MidAmerican encourages IDNR and IDALS to work to develop new ways to approach the problem.

The participation rates required in the combination scenarios within the report are unrealistic at best (e.g. "60% Acreage with Cover Crop"). Many of these scenarios require participation rates of 50% or greater on agricultural land statewide. With 2011 estimated total acreage in production at 30.7 million acres. Under one scenario of the NRS, 60% of this acreage means that at least 18.42 million acres need to use best management practices as identified in the strategy. U.S. Department of Agriculture data indicates that current acreage enrolled in all conservation practices in Iowa is approximately 1.6 million acres, or 5.2%. It is clear that current practices are not achieving a demonstrable impact and it is unclear from the strategy how continuing current practices will achieve greater participation rates. As currently drafted, the strategy places the burden on point-source discharges to achieve discrete nutrient reductions but continues with voluntary measures for nonpoint sources when these measures have not been shown to achieve significantly measurable reductions.

The lack of specific, clear, and measurable goals or recommendations for non-point sources is also a significant omission. To achieve the nutrient reduction goals identified in the strategy, the strategy needs to identify an implementation plan as well as a metric to gauge progress towards these goals. Without these measures, it is difficult to understand how the nonpoint science assessment can be regarded as a strategy at all.

### Section 3: Point Source Discharges

The draft strategy is unclear about the timing necessary to modify NPDES permits to incorporate the nutrient reduction targets. MidAmerican requests that any new monitoring or feasibility requirements be included in a NPDES permit only at the end of each five year permit cycle. A permit renewal should be the only factor used to incorporate nutrient requirements into wastewater permits; the nutrient strategy alone should not be used to open a permit for modification outside the normal five-year renewal schedule. For those facilities which need to complete a feasibility study, the strategy should clarify the schedule and scope of such studies, including whether a third-party consultant is required to conduct the study.

It is also unclear how the Iowa Department of Natural Resources intends to implement the NRS for point source dischargers without biological treatment, and whether there are mechanisms by which a facility can demonstrate it should not be subject to the NRS. MidAmerican requests that facilities without biological treatment should only be required to monitor for the presence and concentration of nutrients in wastewater streams. If concentrations above the NRS effluent target are not found, the facilities should be allowed to discontinue monitoring and a feasibility study should not be required. Additionally, MidAmerican believes that surface water withdrawn for processes such as once-through cooling water, where no contact is made with other process flows, should be exempted from monitoring and the proposed limits. MidAmerican also asks that other discharges at a facility, which are sourced from surface water, be subject to the limit on a net-addition basis to account for existing concentrations in surface water.

Finally, MidAmerican has received a copy of an expanded industrial facilities list that includes five MidAmerican facilities as "major" dischargers. An error was noted in this draft list: Louisa Generating Station (NPDES Permit #: 5800105) was listed as an industrial facility with an activated sludge treatment system. Louisa no longer utilizes an activated sludge wastewater treatment system for domestic sewage treatment. The facility now has a mound septic system with no discharge, and the previous outfall has been eliminated as reflected in the permit issued April 12, 2012. This change should be reflected in the list of major dischargers used for the NRS.

MidAmerican appreciates the opportunity to comment on the draft Iowa Nutrient Reduction Strategy.

Respectfully submitted,

Jennifer McIvor  
Director, Environmental Programs, Compliance and Permitting  
MidAmerican Energy Company  
4299 NW Urbandale Drive  
Urbandale, Iowa 50322  
(712) 352-5434  
e-mail: jmcivor@midamerican.com



**Name** Trees Forever**City** Marion**State** Iowa**Providing comment on the following sections:**

<input type="checkbox"/>	<b>Executive Summary</b>	<input checked="" type="checkbox"/>	<b>Nonpoint Source</b>
<input checked="" type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

Trees Forever would like to thank the Nutrient Reduction Strategy Team for undertaking such a monumental task in developing the Iowa Nutrient Reduction Strategy and for positioning Iowa as a national leader in improving water quality and reducing nutrient pollution.

As the science assessment conducted for the strategy shows, buffers provide significant reductions in both phosphorous (58%) and nitrogen (91%), and while it should be noted that N reductions specifically are limited to the volume of water in actual contact with the root zone of the buffer, relatively recent and on-going research into the design of saturated buffers is showing considerable progress in delivering even higher volumes of tile water for treatment. This will make buffers an even more attractive option for reducing both N and P. Of course buffers provide many other benefits as well, from increased carbon sequestration to mitigate global warming, to enhanced wildlife habitat, the benefits are many.

What makes buffers work so well is perennials. Grasses, flowers, trees and shrubs provide the living cover and root systems to hold soil in place throughout the year, even in the early spring when precipitation rises and downpours can occur. The perennial influence can be seen in other practices that show significant reductions in N and P. Cover crops & living mulches (31% - 41% less N), energy crops (72% less N and 34% less P), CRP (85% less N and 75% less P), grazing (85% less N and 59% less P), all these perennial options can provide the reductions needed to achieve water quality goals. While it will take more than just getting more perennials on the ground, virtually nothing else provides the most benefits for dollar expended than focusing on perennial options and buffers specifically.

Given how well perennials work to achieve the reductions called for, we strongly encourage the Water Resources Coordinating Council to prioritize practices that use perennials for further research funding and implementation. Certainly, challenges exist to wider adoption of perennial options on the landscape, but with coordinated funding we can overcome some obstacles to getting perennials on the landscape.

Trees Forever is entering its 15th year of working with the agriculture community establishing buffers to achieve multiple benefits. Surveys conducted in 2008 asked landowners to self-report on how well their buffers were functioning and improving water quality. 96% of respondents replied that their buffer was effective in controlling erosion and protecting water quality and 95% replied that their buffer was working as hoped. This feedback shows us that not only do buffers work (as the science has shown), but that landowners recognize how well buffers work on their farm and the value they provide in improving water quality.

We look forward to working with stakeholders, landowners, agency staff, and other partners in implementing the Nutrient Reduction Strategy in Iowa and achieving the water quality goals established. To achieve the nutrient reductions specified within a voluntary framework, additional funding must be a priority to support the implementation of this plan and the practices outlined. Technical assistance on planning, design, establishment, and maintenance will also need to be increased congruent with the demand. Trees Forever, along with a host of other organizations working with landowners on landscape decisions, stand ready and welcome the opportunity to get started. Iowa's farmers are innovative, caring, and willing to roll up their sleeves to get the job done; we look forward to assisting them in this voluntary endeavor.

**Name** Jeff Jensen**City** Lone Rock**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

My comments, praise, criticism, and suggestions are all within the context of truly wanting to see improved water quality for improved health and quality of life. To achieve this, perennials need to be at the top of the prioritization list given the multiple benefits they can provide and the documented effectiveness at reducing nutrient loading. Furthermore, perennial crops strategically placed on the landscape fit within a market based approach favored by the nutrient reduction plan.

First the praise,

- Thanks to members of the science assessment team working to document and organize the various practices and modeling use in the state.
- The strategy recognizes that more information and further research is needed.
- Recognition that targeting will be required to make significant reductions.
- Flexibility for pilot projects to demonstrate new technologies.
- Seeks to establish Iowa as a national leader in addressing nutrient loading and improving water quality.

Now the criticism,

- The whole secretive process leading up to the release of the strategy was disappointing. As a citizen I value transparency throughout government. It did not seem warranted and should not have been handled in such a way.
- Although addressed in the strategy itself as an area that needs more research, the economic analysis not providing any sort of benefit for the simple value of clean water was disappointing, as was the fact that some of the scenarios that called for perennials (buffers, land retirement, energy crops) received no credit for ancillary benefits. The reason for this concern is that it may skew the viability of these practices in being established.

General Comments,

- While it is understandable why you included corn yield reductions for practices in the analysis, in some cases it is probably not appropriate. The strategy states that the current corn/soybean rotation is "leaky" directly attributing to the problem.
- While nutrient trading has the potential to improve water quality at a lower cost compared to point source measures, the development of such a program will be challenging; property rights will be involved, contracts will need to be uniquely structured, proper baselines established, monitoring for performance developed, verification of reductions conducted, and other issues not foreseen. This does not mean that such a program should not be considered it's merely meant to point out the very real challenges of such a system. Alternatively, Iowa already has a mechanism in place that looks similar to what a potential water quality trading program might achieve. The recent changes allowing for the State Revolving Fund to fund non-point source projects are an excellent first step to getting practices installed for long-term service.

Suggestions,

- Practices that establish perennials on the landscape will give us the most bang for the buck, thus research and demonstration projects that facilitate greater perennial use should receive the highest prioritization. This includes such things as deriving monetary values for diverse ecosystem services and allowing for such services to be stacked for maximum return to the landowner.
- Additional research and demonstration should be prioritized for saturated buffers to increase water volume of tile water contacting the root zone for treatment.
- Marketing assistance and value added funding for perennial crops should receive priority status since small investments in fledgling industries could have significant payoffs down the road (hazelnuts, aronia berry, etc).

In closing, and as a taxpayer who will inevitably be asked to support some of these practices, I want to see my dollars spent on practices and solutions that provide the most benefits for dollars expended. Perennials provide an excellent return on investment when all the benefits are tallied up. Further targeting perennials to the most environmentally sensitive acres will provide even more bang for the buck.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1280**.

**Timestamp** 1/18/2013 4:47 PM

**Name** Richard Miller

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I'm asking you to support the funding of the Iowa Nutrient Reduction Strategy as well as other conservation cost-share programs . I think that as in the past the farmers of Iowa will step up to the challenge to keep our land and waters safe for this generation and those of the future and it can be done voluntarily NOT by mandates Richard Miller

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1281.

Timestamp 1/18/2013 4:48 PM

Name Steve Veysey

City Ames

State Iowa

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

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I have served previously on the DNR Water Quality Standards TAC (1999-2003), and the Governors Water Quality Task Force (2002-2003). I have not been actively involved in WQS issues for several years. My comments will be brief.

The proposed Nutrient Reduction Strategy is strong on science and technology and (as usual) weak on effective policy and implementation. Meaningful water quality improvements will not be achieved because the plan:

(1) Relies on voluntary implementation of best management practices (BMPs). This is a continuation of the oxymoronic "voluntary compliance" approach that continues to be advocated by all sectors of agribusiness. This continues to be a smokescreen behind which agribusinesses can continue to use practices that degrade water quality in virtually every watershed in Iowa.

(2) Requires "market-driven" solutions for agricultural non-point source pollution. This will result in BMPs not being implemented unless there is economic benefit to the agribusiness. Market driven solutions are also part of the recent implementation of Tier 2 antidegradation reviews for "point sources" but with a very distinct difference. The degree to which facilities are required to incur costs to approach Tier 2 protection (no reduction in higher levels of water quality) does in fact use a cost-benefit metric, but within the cost determination the preservation of "water quality" is seen as a benefit to the public.

The current political landscape dictates that the nutrient reduction strategy be based overwhelmingly on voluntary implementation of BMPs. This will not work. The political landscape must be cultivated to require mandatory reporting of BMP implementation, even if the implementation itself remains voluntary. Under the Clean Water Act, this approach could be required NOW, in all watersheds with 303D-listed waters, if we had the gumption to buck agribusiness interests. At the very heart of the TMDL concept is notification to polluters in a watershed and (for point sources) a specific allocation of pollution load. It is mandatory for point sources to discharge no more than their allocation, and to monitor and report progress. We certainly have the GIS and internet savvy to create a mandatory reporting portal for all businesses and residents in a 303D impaired watershed. Even if non-point source polluters are not required to implement BMPs to reduce the level of their pollution, they must at least be required to report their non-compliance.

The only reason we do not have mandatory reporting is because it would show once and for all that the "voluntary compliance" approach is very heavy on the "voluntary", and very light on the "compliance".

I could expound at much greater length about the flaws in this Strategy, however I would be just another voice to be ignored advocating implementation policies not always "voluntary" or "market-driven".

Why should I even bother?

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1282.

Timestamp 1/18/2013 4:49 PM

**Name** Kaye DeLange

**City** eddyville

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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January 18, 2013

Secretary Bill Northey

Iowa Department of Agriculture and Land Stewardship

Director Chuck Gipp

Iowa Department of Natural Resources

Wallace State Office Building

502 East 9th Street

Des Moines, Iowa 50319-0034

RE: Iowa Nutrient Reduction Strategy

Dear Secretary Northey and Director Gipp:

Cargill, Incorporated is an international producer and marketer of food, agricultural, financial and industrial products and services. Cargill businesses work with commodity growers and livestock producers throughout Iowa. The company employs 4,000 people in over 25 Iowa communities and has invested over \$150 million in its Iowa operations in just the last two years.

Cargill supports the framework developed in the Iowa Nutrient Reduction Strategy as developed by the Iowa Department of Natural Resources and the Iowa Department of Agriculture and Land Stewardship. As developed, the point and nonpoint source policies are practical, cost effective approaches to reducing the nutrient levels in Iowa waterways.

Two Cargill facilities in Iowa use biological treatment to process waste. We continually work to make our nutrient removal systems more efficient. Evaluating technology-based discharge limits for existing facilities like ours is more practical than numeric in-stream water quality standards.

Given Cargill's breadth of relationships with Iowa commodity and livestock producers, the company is supportive of the nonpoint source strategy. The assessment of nonpoint source management practices will enable the development of an efficient means to direct public funds and incentives to effectively provide for the greatest reduction in nutrient loads. Iowa producers will remain competitive in grain and livestock markets with efficient and effective practices to minimize nutrient loading in Iowa waterways.

Respectfully submitted,

Kaye DeLange

Facility Manager

Cargill Corn Milling North America

Eddyville, Iowa

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 2 of comment #1282.

Timestamp 1/18/2013 4:49 PM

**Name** Kaye DeLange

**City** eddyville

**State** Iowa

**Providing comment on the following sections:**

Executive Summary  Nonpoint Source  
 Policy  Point Source

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**Name** Cindy Hildebrand**City** Ames**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

When I started reading this strategy, I found it hard to believe that it was proposing to continue the all-voluntary approach to agricultural pollution that has failed to protect Iowa water for so many years. But when I attended the informational meeting about the strategy in Ames, I learned that was indeed the case. Meeting attendees were assured by members of the presiding panel that if Iowa farmers were asked, they would do far more water protection than they have ever done before, and would do it at their own expense, since little public funding is available.

Below are ten of the reasons why that assurance is so deeply unrealistic.

- 1) High crop prices and high land prices, which are a strong incentive to rowcrop as intensively as possible.
- 2) Very high rents and a high percentage of Iowa cropland being rented, which means that a lot of Iowa land is being farmed by operators who do not own the land they farm and have a strong economic incentive to rowcrop every possible acre for the highest possible return.
- 3) The likelihood that the next Farm Bill will not only have less funding for conservation programs, but will also terminate current conservation compliance requirements.
- 4) Widespread ongoing installation of new conventional tile, largely because the payback period for new tile has shrunk to just a few years. Adding more tile increases yields, but it can also increase water pollution.
- 5) A new strong incentive to rowcrop marginal land, an incentive that is being caused by the combination of new higher official CSR ratings for lighter soils and county tax policies that are based on CSR ratings. The result is that in many hilly counties, landowners are being told that they will have to pay higher rowcrop-level taxes on a lot of sloping land that is currently in pasture and woodland. Many of those landowners are now converting or will convert that hilly land to rowcrops, with very bad consequences for soil, water, and wildlife.
- 6) New cellulosic ethanol plants that pay farmers for their corn cobs and stover. Even if the stover removal doesn't cause more water pollution, and it may do so in the future, the ethanol plants are an added incentive to grow more corn, which is hard on soil and water. In addition, there was a report at one ethanol-plant meeting that the cellulosic ethanol plants will enable continuous-corn operations to be significantly more profitable, which means there is another incentive for producers to move to continuous corn.
- 7) Widespread expansion of rowcropped acres through the conversion of CRP land and other land in perennial vegetation.
- 8) The tendency, which can be seen by anyone who drives rural roads, to expand the boundaries of existing rowcropped fields closer to road ditches, into the edges of waterways, etc. I see it in my area and friends in other rural parts of Iowa are seeing it too.
- 9) The fact that farming, as Iowans are often reminded, is a huge industry. Farmers are like other business people who have varied levels of concern about the environment. While some farmers have conservation as a primary focus, the majority of farmers are largely focused, like other business people, on the bottom line.

I grew up in the Detroit area before the Clean Water Act was passed, when local rivers were horribly polluted. If the Clean Water Act had told manufacturers that installing pollution control equipment was optional, some manufacturers would certainly have installed it, but the majority would not, and rivers would still be catching on fire. That is the basic economic reality of pollution control, which the Clean Water Act recognizes but this strategy does not.

10) The failure of the voluntary-only approach to farm conservation to work during the many years it has been used, which is why Iowa's water is so bad now. And according to a 2011 ISU survey, as recently reported in the DES MOINES REGISTER, 72% of Iowa farmers spent less than \$5,000 on conservation on land they own in the decade prior to the survey. Half spent nothing. One third said that even if more money and technical assistance were available, they would not implement more conservation practices.

## Iowa Nutrient Reduction Strategy

Online comment submissions

Page **2** of comment #**1283**.

**Timestamp** 1/18/2013 4:58 PM

**Name** Cindy Hildebrand

**City** Ames

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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At the Ames informational meeting, attendees were told that as part of the effort to persuade Iowa farmers to do more water protection, market-based strategies would be used. When the panel was asked for an example of a market-based strategy, the only example provided was actually based on wetland regulation.

In addition, it was reported in the news that when a group of Iowa farmers were told about the strategy at one meeting, there were repeated references by the speaker to the big danger of the EPA stepping in and requiring regulations on agriculture if the strategy did not work. The threat of regulation seemed to be invoked far more than any other reason to control water pollution. The reason most water pollution plans and laws across the country in the past several decades have involved regulations and/or economic incentives is because regulations and economic incentives have been shown to work. This strategy has neither.

Of the significant deficiencies in this strategy, perhaps the most disturbing is that there are no timetables, deadlines, or short-term and long-term water-quality goals for Iowa lakes and rivers. If this strategy were put into action, it is easy to foresee someone pointing, fifteen years from now, to a quarter-percent decrease in nitrate pollution in some tiny Iowa watershed and calling it clear evidence that the strategy is successful. In fact, it is hard not to suspect that the strategy might have been written with that in mind.

I have been a conservation volunteer working on water quality in Iowa for more than thirty years. I have been a rural landowner for almost twenty-five years, and my spouse and I are doing conservation work on every acre we own. For us and for many other Iowans who care deeply about clean water and are acting accordingly, this proposed strategy, which should be a reason for hope, is turning out to be yet another reason to feel frustrated and angry.

Given current political realities, the State of Iowa may well decide to adopt this strategy. If that happens, the EPA should not accept it.



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1284.

Timestamp 1/18/2013 5:10 PM

**Name** Linda D. Appelgate

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

2835 46th Street

Des Moines, Iowa 50310

January 18, 2013

Mr. Bill Northey, Secretary

Iowa Department of Agriculture and Land Stewardship

Mr. Chuck Gipp, Director

Iowa Department of Natural Resources

C/o ANR Program Services

2101 Agronomy Hall

Iowa State University

Ames, Iowa 50011- 1010

Dear Mr. Northey and Mr. Gipp;

Thank you for the opportunity to comment on the Iowa Nutrient Reduction Strategy and for extending the comment period to January 18, 2013. My comments concern the non- point source aspects of the strategy.

While I appreciate a science-based approach to reducing nutrients in our waters, the science you reference addresses only technologies of what works on the landscape. That is only half the story. Where is the equally important science of who, what, where, when, why, and how landowners will voluntarily adopt these technologies? If a voluntary approach is to work, that is an equally important body of science missing in this strategy.

How many research dollars have been devoted to the science necessary to determine if farmers will voluntarily adopt conservation practices on a scale sufficient to make a measurable difference in our water?

Perhaps the science needed to understand whether voluntary landowner adoption will work to reduce nutrients and under what conditions is not addressed because the science we have is not reassuring. Two recent examples:

1. Iowa State University's own 2011 Iowa Farm and Rural Life poll shows that of the 1,276 farmers who responded, 77% had not visited their USDA service center (the site of all local, state, and federal soil conservation programs in each Iowa county) for the past two years. Additionally, when asked, if more funding and technical assistance were available, I would implement more conservation on the land I farm, 70% said either strongly disagree, disagree, or uncertain.

2. An Iowa State University study published January 9, 2013 titled "Watershed Sediment Losses to Lakes Accelerating Despite Agricultural Soil Conservation Efforts" studied Iowa's soil erosion over the past 150 years. Analyzing sediment core samples from 32 natural lakes, researchers showed that in 1900 it took 23 years for an inch of sediment to accumulate; today it takes only four years. ISU professor, John Downing, one of the study authors, said that in spite of spending \$250 billion over the decades to prevent soil erosion the study shows the amount of sediment washing downstream is growing rather than shrinking.

From personal experience, from 1987 to 1999 I served as an appointee of Iowa Governor Branstad to the State Soil Conservation Committee in the Iowa Department of Agriculture and Land Stewardship, including four years as chair. During those twelve years, I worked with countless farmers and soil conservationists. Almost to a person, conservation farmers and conservation professionals privately said, voluntary doesn't work with enough landowners. At the time, it was heresy to say those words publicly but their truth was painfully obvious on the landscape

## Iowa Nutrient Reduction Strategy

Online comment submissions

Page 2 of comment #1284.

Timestamp 1/18/2013 5:10 PM

**Name** Linda D. Appelgate

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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and in our water. Those words are equally true today.

I also worked as a resource conservationist and RC&D (resource conservation and development) coordinator for the USDA Natural Resources Conservation Service in Iowa from 2004 - 2011. Again, conservation professionals almost universally said (generally upon retiring) □ voluntary doesn't work with enough landowners.

Perhaps there is credible, science-based data showing that voluntarily adoption of conservation practices will work at a scale sufficient to reduce nutrients in our waters. If so, that data needs to be included in this strategy.

If such voluntary adoption data does not exist, we need to be honest about it and spend the time and money to determine if any exclusively voluntary program would work on a broad scale to reduce nutrients in our waters. If the answer is no, then we must work together to determine what regulatory policies and programs would be most reasonable and effective in protecting our waters and reducing nutrients in combination with voluntary programs.

Taxpayers investing millions of dollars in conservation need to know their dollars are going where they are most effective as documented by specific milestones and measurable effects on our water.

The proposed nutrient reduction document is, sadly, not a strategy. It is only the outline of a vision cynically set up for failure by recommending only voluntary adoption of conservation practices. It contains no specifics for implementation, no timelines, and no milestones or measures of success □ and no data to show that landowners are inclined to adopt conservation practices on any scale that would show measurable reduction in nutrients.

I sincerely hope that someday Iowa will have an effective plan for nutrient reduction in our waters. We desperately need it. Hundreds of farmers, scientists, policy makers, agency professionals, and concerned citizens are ready to assist in creating and implementing such a plan.

Sincerely,

Linda D. Appelgate

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1285**.

**Timestamp** 1/18/2013 5:14 PM

**Name** Gary Runyon D.V.M.

**City** Allerton

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Policy**

**Nonpoint Source**

**Point Source**

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I am writing in support of the nutrient strategy program developed by the state of Iowa. It is to be designed by state groups who will also enforce the program. It is local(Iowa)science based, well researched and flexible. It will help reduce the amount of N carried in our water and the amount of P removed if our soil washes. Spring time applications of N along with buffer strips, wetlands and bioreactors all are in use and do help. Most farmers are already doing less tillage (minimum till and no till) and we are starting to use more cover crops in the fall and winter. One problem with cover crops is that Federal Crop insurance programs currently prohibit cover crops if you want to insure your next summer's main crop. This needs to be changed.

I also read recently that the Brazos River in Texas flows into the Gulf of Mexico below the Mississippi Delta and its water stays on top of the salty water in the Gulf. This could be part of the cause of Gulf hypoxia.

Gary Runyon D.V.M.

2239 Highway S40

Allerton, IA 50008

641-870-0244

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1286**.

**Timestamp** 1/18/2013 5:15 PM

**Name** Kevin Ross

**City** Minden

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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January 9, 2013

Nutrient Reduction Strategy

ANR Program Services

2101 Agronomy Hall

Ames, IA 50011-1010

Dear Sir or Madam:

As a corn and beef producer from southwest Iowa, I support the voluntary and science-based approach of the nutrient reduction strategy. As a family farmer with two young sons, I care deeply about the soil and water resources that the next generation of Iowans will inherit, and it is important that the strategy is implemented successfully.

Because I raise crops and livestock, nutrient management is a daily concern for me. I know that some parts of my farm need different nutrient management practices than others. The same is true for the State of Iowa. The weather, soil, terrain, crops, and livestock can vary greatly across the state. This is why the voluntary approach is important because it allows farmers to use science and ingenuity to deal with varying conditions. Top down regulations do not guarantee success and only stifle the ingenuity of farmers.

I appreciate the great work that went into the science assessment. It shows that systems of in-field and edge-of-field practices are needed which regulations simply cannot duplicate. The assessment also shows that the effectiveness and costs of conservation practices vary widely and asking farmers to implement them will require financial and technical assistance.

The strategy is a roadmap, not turn-by-turn directions, and I appreciate the opportunity to provide input as the strategy develops. The State of Iowa will need to provide resources in order for the strategy to succeed, and I look forward to participating in future programs to address nutrient reduction.

Sincerely,

Kevin Ross

Minden, Iowa

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1287.

Timestamp 1/18/2013 7:11 PM

Name Dave Elias

City Iowa City

State Iowa

Providing comment on the following sections:

Executive Summary

Nonpoint Source

Policy

Point Source

January 18, 2013

Adam Schnieders, DNR

Dustin VandeHoef, IDALS

John Lawrence, Iowa State University

Nutrient Reduction Strategy

ANR Program Services,

2101 Agronomy Hall,

Ames, Iowa 50011-1010

Re: Comments on Iowa Nutrient Reduction Strategy

Dear Sirs:

The City of Iowa City Wastewater Division supports the effort to improve water quality conditions in our community, the state, and on a national level. The City has endeavored to practice responsible stewardship related to water quality by investing a tremendous amount of money in the past 25 years. Mandated requirements, routine maintenance, and voluntary projects have been carried out that have helped us to meet compliance issues and further demonstrate, promote, and enhance the water environment within our control. Infrastructure investment by the Wastewater Division alone has amounted to nearly \$150,000,000 for a municipality of around 60,000 people. Besides that, annual operations and projects carried out by other city divisions would show an even larger investment and commitment to the water environment. The City and citizens of the community have made these efforts at a cost, although the results are not perfect and we see more could be done.

The City of Iowa City Wastewater Division must operate within limited financial and operational means, so it is imperative to us that our efforts go towards reasonable, equitable, cost effective and productive projects. The Executive Summary of the Iowa Nutrient Reduction Strategy states in the first paragraph:  it is designed to reduce nutrients in surface water &  in a scientific, reasonable, and cost-effective manner. The proposed Iowa Nutrient Reduction Strategy is not entirely in line with those principles for all parties that will be impacted by the  strategy .

The strategy does not correlate well with current EPA approaches to point source control of nutrients. The Iowa strategy must conform to the same use of terms and practices such as  water quality based, technology based, numeric nutrient criteria, nutrient limits, and narrative criteria . Without such conformance, no point source project approved by DNR will provide protection from further federal regulatory action and liability. This could result in projects being duplicated, costs wasted, fines levied for activities that were carried out in good faith but are interpreted by EPA to not meet the  letter of the law . It would not be reasonable or productive.

The Nutrient Control Strategy indicates that mandatory regulatory permits will be used to obtain the targeted reductions for point sources. The reduction target of 4% for nitrogen, for example, out the point source contribution of 8% is a small amount overall. However, the goal of achieving small reductions is not evenly spread to all point sources across the state. Only the 130 so-called  major sources would bear the burden, leaving many hundreds of other communities out of the effort simply because they would only achieve a  small result. Some small and some large communities have made conscientious decisions to provide facilities above and beyond their current needs and regulatory requirements. Their past efforts and investment would not be acknowledged while those communities who have made conscious decisions to avoid progressive steps toward contributing to water quality improvements would continue to be ignored. In Iowa, the economy, the culture and the use of natural resources are not really separated by urban and rural residences or businesses. No one in Iowa really lives more than 30 minutes from a cornfield and no one in Iowa really lives more than 30 minutes from a city. It is not particularly cost effective to achieve small reductions in nutrients. It is particularly not equitable to not ask everyone to try.

**Name** Dave Elias**City** Iowa City**State** Iowa**Providing comment on the following sections:** **Executive Summary** **Nonpoint Source** **Policy** **Point Source**

The Nutrient Reduction Strategy cannot achieve its stated goals in the non-point source area either. It acknowledges that the largest contribution of nutrients comes from wide spread agricultural activities. The strategy expects to produce a 41% reduction in nitrogen, out of the 92% contribution from Ag, by voluntary practices. This approach does not acknowledge the lessons in progress toward water quality in the state from the 1972 Clean Water Act. Point source municipalities and industries did not build extensive treatment facilities voluntarily over the last 40 years. Yet today, there are Iowa municipalities and industries that seek to avoid even mandated regulatory compliance. In agricultural businesses, the same Iowa culture and practical avoidance results in water quality decisions being deferred or declined.

The evident agriculture approach is for bottom line profits, as in all business, rather than water quality. If water quality was a cost of doing business in agriculture, just as it has become a cost of living expense in municipalities, then there could be a more realistic expectation of change. The following excerpt from the Cedar Rapids Gazette on January 9, 2013 indicates the prevailing actions of the agriculture industry:

More ag drainage tile has been installed in Iowa during the past two years than in any other comparable period. (ISU Extension field agronomist)

Dips in combine yield monitor data showed exactly which of his Buchanan County fields were most in need of more tile. Quasqueton Farmer.

Farmers have money to spend, but land prices are so high they are investing in tile. Dense tiling can cost as much as \$1,000 per acre, but farmers quickly recoup their investment through the increased value and productivity of their land. Although almost all Iowa cropland has already been tiled, many farmers are installing more of the plastic drainage tubes in a practice known as pattern tiling (Tiling Contractor, past president of the Iowa Land Improvement Contractors Association)

<http://thegazette.com/2013/01/09/iowa-farms-with-good-drainage-systems-did-well-in-drou...> 1/9/2013

The use of voluntary approaches for implementing statewide Best Management Practices has not worked for water quality improvements so far. It is not a reasonable, equitable, or productive approach to expect this to change now.

The Iowa City Wastewater Division would like to see a successful Nutrient Reduction Strategy adopted for Iowa and the entire Midwest. For such a strategy to be successful it must be modified to include the following, at least:

1. Agreement with and conformance to federal EPA language, practice, legal acknowledgments and protections for point source contributors.
2. Application of the strategy in an equitable and reasonable manner to all contributors in the state.
3. Conformance of requirements for implementation and compliance to point source and non-point source contributors alike major and minor, urban and rural.

This could enable real progress to be seen in water quality improvements in the state of Iowa at least.

Sincerely,

Dave Elias

Wastewater Division Superintendent

City of Iowa City

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1288**.

**Timestamp** 1/18/2013 7:12 PM

**Name** Danielle Van Ryswyk

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

Please support the science-based state nutrient reduction strategy. Adequate funding this program and other conservation cost share programs is important to Iowa. Danielle Van Ryswyk

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1289.

Timestamp 1/18/2013 7:40 PM

**Name** Greg Vitale

**City** Ames

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Iowa waters are polluted and our water resources are marginalized. As a result, so are our outdoor recreational opportunities and the many businesses that could serve Iowans and regionally. Look no further than down the hill from the capital at the development along the greenbelt trails in downtown Des Moines which goes well beyond outdoor recreation.

The economic prospects of a community are related to the number of young professional with college degrees. These young professionals have many choices and often prefer areas with more recreational and enticing outdoor opportunities. Iowa and its communities are poorer for the way we under invest in our environment, including protecting our water resources.

Having consistently underestimated what is needed to make our dam made lakes more than expensive silt traps, we now commonly close beaches during parts of the summer due to the potential for diseases. This has been the situation with Hickory Grove in Story County the past two years where a triathlon was unable to swim. The same could be said for Big Creek and Saylorville.

The proposed voluntary standards for the rural multi-point sources of pollution is not realistic after decades of under investing in protecting the dam made lakes, water resources, and more generally, our parks and the environment. It is likely that the proposed voluntary standards are more likely to make the situation worse, just as relying on voluntary taxes would make a deficit worse.

Our economic future is inexorably tied to our investments, including our environmental investments and specifically our water resources which the state recklessly wastes and virtually gives this valuable asset away as if it were a disposal shopping bag of little import. Iowans and more generally, our neighbors downstream, deserve better. A meaningful proposal needs actual enforceable standards that will address the dire state of Iowa's many polluted lakes, rivers and other waters, based on science and the pivotal place water has in our lives and in economic development.

Gregory Vitale, Economist, American Canoe Association Instructor and Iowa Water Volunteer,

2510 Pierce Ave, Ames, IA 50010



# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1290**.

**Timestamp** 1/18/2013 9:12 PM

**Name** Dale Patrick

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Agriculture should be put under strict limits, enforced by law. Why should cities be restricted and agriculture put on their conscience?

Name christine ziebold

City Iowa City

State Iowa

Providing comment on the following sections:

<input checked="" type="checkbox"/> Executive Summary	<input checked="" type="checkbox"/> Nonpoint Source
<input checked="" type="checkbox"/> Policy	<input checked="" type="checkbox"/> Point Source

am writing as a pediatric infectious disease specialist, former assistant professor at University of Iowa, mother of a young boy and outdoor enthusiast. We moved from Minnesota to Iowa City in 2006. I have become aghast at the effects of Iowa's agribusiness operations on Iowa's natural resources, including fauna, flora and human health.

I find many Iowans unaware of how deeply disturbed their landscapes and ecosystems are, and how immense the problem of the "dead zone" in the Gulf of Mexico has become over the past 2 decades due to Iowa's ever increasing nutrient load flowing down the Mississippi River. It is especially the waste of 19.3 million swine, 3.98 million cattle, and 69.2 million poultry in the language of its business "produced annually", which dwarfs the domestic sewage of its mere 3 million humans, besides huge amounts of nitrogen and phosphorus from fertilizers.

The best kept secret may be that nutrient reduction at the source, here in Iowa, to help the far away macro-environment of the Gulf will also help the micro-environment of human bodies here in Iowa, where nitrates cause negative health effects; The Iowa Women's Health study showed elevated risk for ovarian, uterine, bladder and rectal cancers. Nitrates were classified as probable carcinogen (2A) only recently. Because nitrate levels have been so consistently elevated in our drinking water supplies, Iowans have earned the infamous distinction as the National Cancer Institute's preferred population to test associations of nitrate exposure and cancer.

Drastic and speedy changes in polluter behavior are needed. To continue business as usual and delay, as IDNR's "Iowa Nutrient Reduction Strategy" proposes, is therefore unethical. How delay tactics have helped interests of non-regulation has been convincingly demonstrated for the chemical industry; this so far toothless plan may be the test case for the delay game played by agribusiness interests, which are so thoroughly intertwined in Iowa political power, and thus the politically appointed leaders of regulatory agencies. The plan bears the mark of IDNR director Chuck Gipp's whose lack of qualification in conservation and his agro-economic interest are reflected in his voting record since 1995 and in sharp conflict with the IDNR mission.

IDNR's "Iowa Nutrient Reduction Strategy" is unacceptable.

I am concerned that the plan

- will not change the "poor or very poor" quality of 80 % of the monitored sites every summer, barring our family from recreational water use, and regularly expose us to temporary nutrient excess in overly chlorinated, nitrate spiked, and poorly tasting drinking water.
- moves even more costs to taxpayers, who already pay for Iowa's water conservation programs.
- furthers the farm sector's unwillingness to "own their load" and is part of a delay game.
- effectively guarantees continued profitability of unsustainable agribusinesses
- contradicts IDNR's mission to "conserve and enhance Iowa's natural resources and to ensure a legacy for future generations".

I have the following suggestions:

1. Polluters must pay.

- a. Agro-businesses (high spatial density of row crops and CAFOs) are clearly responsible for the bulk of the problem, as documented by IDNR, so the financial burden of agricultural pollution should absolutely not be shouldered by taxpayers.
- b. All farm businesses must start to treat manure like cities treat sewage, if they wish to discharge. All CAFO's should be required to get permits. Permit fees should be substantially increased to serve as a reasonable collateral for the potential damage inflicted by nutrient spillage. Part of the fee should go into a fund for emergency clean ups. If an applicant demonstrates that farm business insurance covers for spills, upfront permit fee could be lowered. Penalties should be levied for any nutrient discharge, spillage or runoff into waterways, and permits should be suspended until the root cause has been remedied. Thus the permitting process, now considered burdensome by CAFO owners/operators, could be greatly simplified.
- c. The State Revolving Fund, financed by sewer revenues, must no longer be used to address agro business pollution (presently Category VII-A. and B).
- d. Agro-business water pollution should no longer be considered a non-point source. Why it was and is largely exempt from the Clean Water Act is a (political) mystery. Clearly identifiable groups of farm owners are responsible in different waterway regions, and when in doubt they should be held responsible collectively.
- e. Since less than 10 % of nitrogen fertilizer is applied to non-agricultural grass its discontinuation would have negligible impact on the Gulf's hypoxia. However lawn fertilizer use by private citizens could be taxed with a "Gulf Hypoxia fee" or fertilizer sale could be completely prohibited, especially in Iowa's lawn-obsessed and prairie-deprived urban areas. Precedence for such rules and ordinances exist in multiple other, more environmentally conscientious states.

2. Mandate decreased water pollution by all nutrient users. Voluntary measures to clean up Iowa's water over the last 40 years since passage of the Clean water Act have completely failed and thus can no longer pass as sane proposals. Water clean-up and pollution prevention must become an IDNR #1 priority.

- a. Farm businesses must reduce water pollution by a MINIMUM of 45% (N) and 29%(P) by 2015, as part of the Gulf Hypoxia Taskforce target that IA agreed to.
  - b. Every future IDNR Agency Performance Plan must address water in all its core functions (enforcement, regulation, resource management).
3. Mandate minimum standard of care for nutrient users.
- a. Mandate numeric standards for nitrogen and phosphorus. An increasing number of extreme weather events means increased nutrient run off and needs to be taken into account.
  - b. Recommend all the conservation land use practices and edge of field practices for farmers that the science assessment outlined as minimum standards.
  - c. Use agricultural densities as a decision making tool in permitting.
  - d. Consider reductions in lawn fertilizer use in municipalities by 50% within 3 years.
  - e. Ban detergent phosphorus use, as 16 other states have.

f. Recommend storm water fee assessment based on the storm water runoff generated by impervious and pervious areas aka equivalent hydraulic area, as done in numerous other states (incl City of Minneapolis), in anticipation of EPA storm water regulations 2014.

g. Encourage municipalities to educate about and incentivize rain gardens. The Iowa Water and Land Legacy constitutional amendment from 2010 remains an unfunded mandate; if funded money could be used for this purpose.

4. Specify implementation of the plan. IDNR must prioritize the polluters, and the scenarios for nutrient reduction, and explain how it arrives at the prioritization, who will make decisions.

a. Publish how many (medium and large) sized CAFO's Iowa has for hogs, cattle and layers on IDNR's AFO website, including their ownership. I found wide variations in estimates how many medium and large CAFO's Iowa has at any given point in time (up to 8000). The present lack of data transparency does not serve the public, nor researchers. The IDNR website currently only publishes maps of AFO's, no

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 2 of comment #1291.

Timestamp 1/18/2013 9:36 PM

**Name** christine ziebold

**City** Iowa City

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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numbers . EPA publishes only Iowa's permitted ~ 1000 CAFO's , which is a fraction of the number of AFO's. EPA uses herd size, animal weight and manure handling system criteria, that are not published by USDA census to this detail to understand how it arrives at such a low # The last USDA Statistical service bulletin estimates tables of hog, cattle and layer AFO's >1000 head alone add up to 4,634. A lay person cannot reasonably calculate the numbers of medium and large CAFO's. There is a general belief, that IA's CAFO's are family owned, unable to afford upgrades, so facts to confirm or refute this are needed .

b. Set aggressive interim goals for nutrient reduction

c. Establish a semi-annual timeline for the reduction plan, since the target in 2015 is less than 2 years away.

d. Measure progress semi-annually, not annually as suggested, and post it on the IDNR website.

The lack of key components of quality improvement in the Iowa Nutrient Reduction Strategy document, but their existence in other IDNR documents (Planning for Water Quality Iowa's nonpoint source management plan from July 2012 for example ) is odd. It appears as if staff suggestions of these steps were edited or censored by top leadership. This (political) censorship would not unprecedented, as it has been reported from other states, but it should be made public.

Sincerely,

Christine Ziebold MD PhD MPH

PS: In the interest of transparency consider posting comments that other people have submitted, as is the custom with dockets of most regulatory agencies.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1292**.

**Timestamp** 1/18/2013 10:18

**Name** James Rubis

**City** Fairfield

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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I own a farm in Jefferson County in the Big Cedar Creek watershed. I see close hand that voluntary practices do NOT successfully control erosion/pollution problems. Mark S. Edwards, a 30 year Iowa DNR expertly summed up the situation in a letter to the D.M. Register. I expect he submitted comments. Just a couple of his lines:

" I...have inside knowlege of the budget-deprived, politcally-dominated mission of 'conserving and enhancing our natural resources.'..... These voluntary strategies will do little to slow the expanding debt of pollution.....Two thirds of Iowa's 39 million acres are drowned in chemicals for just two annual plants, corn and soybeans.....The deadly decision of voluntary compliace as floated by the water quality strategy is killing our world. "

Please go back to the drawing board with a new plan. lowans have poisoned the water of Iowa and the world for to long. The record shows we will not fix it ourselves. Regulations and restrictions MUST be put into place to stop the damage.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1293**.

**Timestamp** 1/18/2013 10:27

**Name** Duane Bodermann

**City**

**State**

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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Secretary of Agriculture Northey,

I would like to encourage you to continue to fund conservation cost share programs. It has been helpful in terracing and waterways we have done on our farm. If it were not for the cost share it would be difficult to do those projects. Duane Bodermann

**Name** Sally Gran

**City** Nevada

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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I grew up playing in East Indian Creek, and still live nearby. Last year, we tested the creek for E. Coli and Fecal coliforms. It ranked at 3,300 colonies per 100 ml--far, far above safe levels for even recreating. Our creek is full of toxins from human and animal waste, and along with those toxins--a boatload of nitrogen and phosphorus. A waterway that should be a community resource has become a community hazard. Where might the excess excrement come from?

-Several farmers upstream allow their livestock to wallow in the creek, or have inadequate buffer or riparian areas to prevent runoff during rainstorms.

-Additionally, most of the houses in our area have outdated septic systems that overflow directly into the creek.

Iowa farmers work hard to feed the world, but in the meantime, we have starved fishermen in the gulf of their own source of food and livelihood. And, back in Iowa, we have starved our own little creek of much aquatic life.

To be effective, the Nutrient Reduction Strategy must include:

1. A timeline with firm objectives (to show whether or not the voluntary adoption has been successful in incrementally reducing nutrient pollution)
2. The opportunity for objectives to be met voluntarily, with incentives
3. Disincentives, penalties, or taxes that will be enacted if objectives on the timeline are not met voluntarily

Additionally, the following practices should be a part of the plan:

For rural residents:

-Update their septic systems, with financial assistance to those who need it, and tax incentives to all

For farmers:

-Practice better manure management, including installing riparian areas, shade trees, waterers, and fences around creeks to deter cattle from depositing excrement in or close to waterways

-Apply synthetic nitrogen fertilizers only in the spring

-Avoid over-applying synthetic fertilizers

-Plant cover crops to absorb excess nutrients, and build fertility (which would also improve and preserve our greatest resource-- our topsoil)

-Establish grass waterways, and buffer areas to reduce nutrient runoff from fields and pastures

For Legislators:

-Utilize some of Iowa's budget surplus to fund this plan, and enable it to be effective

One final note:

Iowa's nutrient reduction strategy needs to take into account the well-being of all of Iowa's citizens, not just those with the greatest wealth and lobbying power. I was very concerned to learn that parts of this strategy were lifted directly from text created by a political lobbying organization that tends to represent the interests of large agricultural businesses. Yes, it is critical to involve farmers and residents of a rural areas in the creation of this strategy. But, as a farmer, a rural Iowa resident, and a believer in a democracy in which citizens have equal rights, I do not feel that my interests are always represented by the aforementioned political organization, and the extreme viewpoint that farmers should never be restricted. Farmers are just like other people--we can be easily tempted to act in economic self-interest, rather than for the greater good.

## Iowa Nutrient Reduction Strategy

Online comment submissions

Page **2** of comment #**1294**.

**Timestamp** 1/18/2013 10:31

**Name** Sally Gran

**City** Nevada

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**       **Nonpoint Source**  
 **Policy**                       **Point Source**

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Our water is a resource we cannot afford to sacrifice in order to satisfy political allies. We cannot allow our water to be poisoned simply because it might be politically advantageous to delay real action. It is the job of government to ensure safety and order. Please take the steps that are necessary to give teeth to this plan. Add a timeline, make it voluntary at first (with incentives), but if it is not effective, there must be disincentives.

Thank you for considering public comment while making public policy!

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1295.

Timestamp 1/18/2013 11:09

**Name** Robert Brammer

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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Count me for required practices, not just voluntary, to reduce excessive nutrients.

Count me for measurable targets and results, so in the future we have bench marks to determine if action and practices have made sufficient progress.

Count me overall for a strategy that swiftly and seriously makes progress on the nutrient overload that is harming our own waters and the Gulf of Mexico, progress that means solving this problem for good for decades to come and generations to come.

###



**Name** Jane Shuttleworth**City** Okoboji**State** Iowa**Providing comment on the following sections:**

<input checked="" type="checkbox"/>	<b>Executive Summary</b>	<input type="checkbox"/>	<b>Nonpoint Source</b>
<input type="checkbox"/>	<b>Policy</b>	<input type="checkbox"/>	<b>Point Source</b>

Thank you for the opportunity to comment on the Iowa Nutrient Reduction Strategy.

The purpose of the Iowa Nutrient Reduction Strategy is to assess and reduce nutrients to Iowa waters and into the Gulf of Mexico where excess nutrient loading has created chronic hypoxia □ dangerously low oxygen levels □ in a zone reputedly over 3000 square miles and growing.

The federal Clean Water Act provides a framework for states to address this problem. One tool of the CWA is the TMDL (Total Daily Maximum Load) program, in which states are required to identify impaired water bodies that do not meet their designated uses. Once identified as impaired, scientists prepare a TDML report with analysis of pollutant sources for each impaired water body and plan to restore them to their designated use. Since early 2000, Iowa has prepared TMDLs for over hundred water bodies, but after studying the Executive Summary I did not find any mention or reference of Iowa's TDML (Total Daily Maximum Load) programs.

Shouldn't the TMDL program be part of the nutrient reduction strategy?

My second comment regards the Report's lack of support for adoption of numeric nutrient criteria to set expectations and benchmarks for evaluating progress on nutrient reduction.

I understand that Iowa and other states are hesitant to set criteria for pollutants that are hard to measure, such as sediments and nutrients □ yet they are our greatest water quality problem and we need benchmarks so we can measure progress. Other states have adopted nutrient criteria □ we can learn from their experience. In November of 2012, for example, the US EPA formally approved the Florida Department of Environmental Protection's adoption of numeric nutrient standards pertaining to streams, spring vents, lakes, and south Florida estuaries. They have developed a hierarchical approach that gives preference to local, site specific information that best translates narrative information into numeric values. Why can't Iowa do the same? In fact, Iowa should be a leader in showing how this can be done!

Page 7 of the Report states point source waste water treatment dischargers would be the primary target of nutrient criterion rather than non-point source, but the Report does not explain why this has to be so, especially when nonpoint sources account for 92% of the total nitrogen and 80% of the total phosphorus entering Iowa streams annually (page 7,) compared to point source discharges □ specifically sewage treatment plants □ that account for approximately 8% of the total nitrogen and 20% of the total phosphorous entering Iowa's streams and rivers annually.

Why can't we use our American ingenuity to come up with creative solutions that will benefit agriculture and point sources alike, such as a cap and trade of pollutants on a say a HUC 9 watershed basis between both entities to a solution? We certainly have the knowledge, technology and expertise to cure this problem. Where I live in the Iowa Great Lakes the immediate economic and ecological benefits to protecting and improving water quality are understood and we have demonstrated willingness to commit resources and creative thinking to solve water quality problems as exemplified by our Dickinson County Water Quality Commission. We could serve as test models/starting points for adoption of nutrient criterion on a watershed basis in which point and non-point source pollution sources collaborate together to reduce nutrients instead of framing it as point vs non-point accountability war.

And speaking of lakes, Iowa has already developed its own nutrient criteria for lakes, they just need to be adopted. Why is there no mention in the Report that these standards exist? Why can't at least Iowa's lake nutrient standards be adopted to set a plan of action in motion?

Finally, I wonder why this report did not have a more robust public comment and outreach component on this very important issue for all Iowans. In 2009 public meetings were held in 7 communities in all parts of the state to receive input on proposed new rules on Iowa water quality standards. Isn't this as important?

Sincerely,

Jane Shuttleworth

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page 1 of comment #1297.

Timestamp 1/18/2013 11:46

**Name** Teresa Reed

**City** Tipton

**State** Iowa

**Providing comment on the following sections:**

Executive Summary

Nonpoint Source

Policy

Point Source

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The voluntary portion of this proposal strikes me as the triumph of hope over experience. We've been offering these voluntary solutions to farmers for the entire length of time that the dead zone has been forming. Since the hypoxic area is not shrinking, voluntary efforts have clearly not met the need.

Therefore, I believe that starting with a regulation requiring a Nutrient Management Plan (following NRCS standard 590) is fair for both manure application and commercial fertilizer application. It makes economic sense; if a producer is overapplying nutrients, he/she is throwing money away. This would be an easy way to plug a leak of nutrients. The existing CCAs and agronomists could write the plans and be certified to check them. They could also report before and after nutrient application, which would be a quantifiable way to measure the difference in nutrient application.

An NMP is not a "one size fits all" approach - each is tailored to the farm's individual needs based on soil tests and economic benefit. This is one example of a broad regulation that is quite unique in the details, and can be applied to every farm that applies manure or commercial fertilizer.

This is only a starting point; producers still need to apply a range of solutions including cover crops, no till, buffer strips, etc. This is where the voluntary portion is quite valid. Conservation practices work together in a way that makes the whole greater than the parts, but it needs to start with not overapplying nutrients.

I know that "regulation" is a dirty word, and throwing it around makes one quite unpopular. However, this is one that will benefit farmers and the environment alike.

# Iowa Nutrient Reduction Strategy

Online comment submissions

Page **1** of comment #**1298**.

**Timestamp** 1/19/2013 12:08

**Name** Ruthanne Harstad

**City** Des Moines

**State** Iowa

**Providing comment on the following sections:**

**Executive Summary**

**Nonpoint Source**

**Policy**

**Point Source**

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As an Iowan born in the state who has traveled widely but remained an Iowa resident by choice, one of my biggest disappointments is Iowa's egregious concern for its lands and waters. Each year, I see more runoff far too many places, learn of more and more manure spills, and am alarmed by the increasing corporate agricultural industry taking over policy decisions. The citizens need clean water for recreation, drinking, and health.

The industry should not set policy, and much more regulation is needed, appropriate to farming types and terrain. Voluntary compliance is NOT enough!

Also, holding private meetings, not public, is unethical. The EPA is even ashamed of and reprimanding Iowa; what an image to present to the nation. Tourism suffers because so much of Iowa stinks now, and few, if any, lakes, streams, and rivers are attractive.

Ruthanne Harstad, Des Moines