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

Sincerely,

Deb Schiel-Larson
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.
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.
If all actions are voluntary don't expect 100 percent participation. Or maybe not even 30 percent participation.
I do agree something does need to be 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.
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.
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.
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.
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.
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.
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.
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
I was just wondering if there is any proposed regulations for municipal areas. Any homeowner 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
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.
I am just a nurse, an in town gardener, and a 5th generation Iowan 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 Iowans expense (and now the rest of the world as we contribute to the oceans deadzones)

So Francis Thickes 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.
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
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 greenhouse 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 greenhouse 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 leak 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. 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 govt) 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 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,
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
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.
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.
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?
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.
Page 14, line 5, contains a mathematical error: The "4 percent" reduction in nutrients should be 41 (forty-one) percent.
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.)
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 thousenth) 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.
Has anyone reviewed Wisconsin's research and results?
Has anyone reviewed Wisconsin's research and results?
Has anyone reviewed Wisconsin's research and results?
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 fluorsilisic 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?
This is a test message for your webform, please disregard. We apologize for any inconvenience.
Secretary of Agriculture Northey,

This is a test message for your webform. We apologize for any inconvenience. Paul Ellender
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.
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) 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.
Secretary of Agriculture Northey,

Voluntary compliance has not worked to date. Must be incentives to comply.  Floyd Walter
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 your time and your work for our future in agriculture. Steve Peterson
Secretary of Agriculture Northey,

please accept that states are willing to implement their own measures to protect the environment. 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
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
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
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
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 environment 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
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
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
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
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 their land and water that feed their family and the rest of the world. Darren Luers
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
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
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
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
Secretary of Agriculture Northey,

As an Iowa farmer, I support science based, voluntary conservation practices as a state nutrient strategy. I currently use filter stips, 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
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
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
Secretary of Agriculture Northey,

Please add my voice to the record of one family who has been consistently, through over 40 years of agricultural "tiling 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
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
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
Providing comment on the following sections:

- Executive Summary [X]
- Policy [X]
- Nonpoint Source
- Point Source

Name: JIM FITKIN

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 its 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
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
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
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 and 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 city's sewer system to see how much they were contributing to the nutrient problem the government would not allow it because the correct politics where 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
Secretary of Agriculture Northey,

As usual, the radicals in the state are tying 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
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
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 livelihood depends on it. Adding more and more regulations is not needed for us to protect our land and water. Frank Klahs II
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 tiled 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 tiled, the wet spots simply move, so surface run-off during heavy rain events are not significantly abated.

All our land is not pattern-tiled 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 (tiled) 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
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
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
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 gold of educating producers would be more productive than federal mandates. Patrick Lynch
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.
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 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
Secretary of Agriculture Northey, 

I am a farmer who uses conservation practices voluntarily. In the past I applied for government 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 contractor 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
Nothing new here. Every person knows what needs to 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.
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
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
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
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
Secretary of Agriculture Nohyey,

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 Valley area have been applying conservation practices for decades trying to maintain 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 assess 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
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

Name  Steve Hanken
       City  Cedar Rapids
       State Iowa

Providing comment on the following sections:

X Executive Summary

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 continues, the worse the problem will get. Enforcement with fines and jail time will make the state of Iowa come into compliance 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 too long.
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.
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
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
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 know how the national government can make 1 rule that is the same for every farm. I am asking that support science-based state nutrient strategy and voluntary conservation practices.

Thank You. Gene Sievers
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
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
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 conversation. 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
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 there 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
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
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
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
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
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 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
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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.
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 recuce 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?
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
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
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 environment 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
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
Secretary of Agriculture Northey,

I support a voluntary conservation practice program based on an individuals given area. John La Fratte
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
Secretary of Agriculture Nortney,

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
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
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
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 a 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 works with theirs soils and land use practices. A one size-fits-all model that limit 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 through 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 Study explains the science behind it and the realistic results that can be achieve 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 chooses 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.
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
If Iowa agriculture does not step up and be responsible for it's part in reducing waterway pollution it will become more and more irrelevant in our state's economy. It will increasingly lose it's positive image and become disenfranchised from it's 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
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 efficiently. 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
Secretary of Agriculture Northey,

Science-based approach is better. Kevin Pruisner
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 of these practices have been done voluntarily. Farmers know their land and their situation better than any textbook 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
Secretary of Agriculture Northey,

I see many other farmers' farming practices as my son and I have a custom fertilizing business as well as have farm 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 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 past 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 government intervention. On our farm we use ridge-till and strip-till methods to save water and soil. Vincent Moye
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 Raccoon 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 occurring nature event.

Senior Chemist Gordon Brand at the Des Moines Water Works can provide information on this Nitrate removal procedure and situation.
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.
After reading the executive summary, and looking at the estimates for percentages of where the nitrogen and phosphorus are coming from, it 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.
Iowa Nutrient Reduction Strategy

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.
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
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.
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
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
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
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 product 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 airs, and a better outdoors for future generations.

Sincerely,

Mark Langgin
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 reduce the hypoxia area in the Gulf of Mexico and meet the Environmental Protection Agency guidelines without regulation.

Thank you.

Ron Swanson
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
ptimmons@hotmail.com
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
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
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
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.
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 assessment are very effective and need to be used more widely. How will this strategy help insure that actual change is brought about?
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.
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
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
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 disappointment for most of us involved in farming operations.  

   Conservation practices are a matter of pride to most farm operators. 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
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
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, no-till, 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 no-till 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
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
Secretary of Agriculture Northey,

I support the science-based strategy to nutrient run-off. I feel that a lot 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 too costly and that we know it isn't a good practice to do so. Thanks Scott Hingtgen
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.
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
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
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. It 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 global population set to double in the next decade we need to work on sustainable practices already in place that can continue to allow us to feed the world.
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
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.
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
Secretary of Agriculture Northey,

Dear Secretary of Agriculture Bill Northey;

We grain farmers pay large sums of money to apply commercial fertilizer to our crop fields. If we have good and useful information as 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
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
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!
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.
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 contour 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 population in our area.

John Looney
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 that what is required by law.
Iowa Nutrient standards

Public comment

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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.

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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.

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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. Isenhart 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 --- CO2 + H2O –à C6H12O2 + O2 The importance of water in the process)

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

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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.
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?
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

Providing comment on the following sections:

- [ ] Executive Summary
- [X] Nonpoint Source
- [ ] Policy
- [ ] Point Source

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
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.
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 minimum to get by. If I believe in what needs to be accomplished, I will do everything possible to get the maximum benefit. Farmers are weighed down with tremendous regulations! Let us do the best for our livelihood and not add more burdensome bureaucracy. I feel the Nutrient Reduction Strategy is a good plan and needs a chance to work. Morey Hill
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
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.
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.
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
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 installation of an equalization basin to help keep dry and wet weather flows well below plant design, should not be penalized for their efforts, and thrown in as a major (with flows greater than 1 mgd.) 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.
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 whatever it takes to make sure the good soil and the chemicals we use stay in place. Denis Heatherington
Secretary of Agriculture Northey,

I would encourage doing science-based state nutrient strategies that use voluntary conservation practices. We use terraces, grass headlands, 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
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
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
Secretary of Agriculture Northey,
Secretary of Agriculture Bill Northey.
I have been no tilling for twenty years, installed buffer strips, and terraces. All 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
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
Secretary of Agriculture Northey,

Support Farm Bureau's suggested plan. Steve Kurth
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
I look around my part of the state[southeast ia.] and the vast majority of the farms practise very good conservation practices. 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 expense, 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 research regarding farmer accomplishments.
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.
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
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.
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
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.
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
I am so appreciative of the cooperative efforts of the dept of ag, dept of natural resources and Iowa State University to collaborate 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 bureaucratic 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 forward 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
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 operate. 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
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 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 farmers 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
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
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.
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
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 or 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.
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.
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 then what came in upstream??? It seems they are a very easy target.

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

Cara Matteson

Environmentalist & Geologist
The application of excess nutrients to farm ground not only polutes 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.
Sustainable development needs to be of utmost important regardless of cost. It not only affects Iowans 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.
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.
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.
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 Iowans 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
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.
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.
You can do better than this.
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.
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.
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
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
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://thewatchtowersearth.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 plains.

Thank you for your time.
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.
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.
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.
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
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.
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.
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
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.
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 flexiible 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.
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.
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.
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.
Dear People,

We are deeply concerned that 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
No transparency. Please pay attention to the DNR comments, not Iowa Farm Bureau!
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
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.
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.
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 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.
We must start over and come up with a better plan than this to stop the problem of contributing to the dead zone.
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
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.
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 voluntary 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.
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.
Winnebago County, Iowa
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 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.
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.
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.
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
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.
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
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.
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.
Iowans deserve better than a status quo strategy for contributing to the dead zone in the Gulf of Mexico.
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.
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.
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.
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
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 nitogen 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.
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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.
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.
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.
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
The committee needs to go back to the drawing board and do this the right having a science based outcome!
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 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.
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
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.
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!
Iowa Nutrient Reduction Strategy
Online comment submissions

Name      Joe Herring
City      Eldora
State      Iowa

Providing comment on the following sections:
- Executive Summary
- Policy
- Nonpoint Source
- Point Source

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.
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,
David L. Meeker, Ph.D., MBA
Senior Vice President, Scientific Services
National Renderers Association
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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Sincerely,

David L. Meeker, Ph.D., MBA
Senior Vice President, Scientific Services
National Renderers Association

801 N. Fairfax St., Suite 205
Alexandria, VA 22314
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.
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 Strategy

Page 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 Drops in the Bucket: Even Rare Boosts in Water Funding Evaporate with Inflation.) http://www.iowafiscal.org/2012research/120626-IFP-water-bgdl.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.
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.
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