Secretary of Agriculture Northey,

We are doing our part to keep our streams clean by stacking our manure during the time the ground is frozen and applying when it can be incorporated in less than 24 hours. Just using common sense goes a long way. Matthew Beran
Secretary of Agriculture Northey,

I think farmers are already doing many things to reduce nutrient loss. I use conservation tillage, I have 3 different types of conservation reserve acres, and I apply nitrogen at several different times during the growing season. I use stabilizers and put on what the crop needs. It is too costly to over apply. We need a sound science proven based approach. It needs to be voluntary. We have proven time and again that we can change our farming practices to meet the current issues. We need to be able to maintain agricultural production and build on it to be able to feed the world. We need you to support and fund the Iowa Nutrient Reduction Strategy and the other state conservation cost share programs. Allen Kramer
Secretary of Agriculture Northey,

As a Marshall County resident and farmer, I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

Please fund the Iowa Nutrient Reduction Strategy, as well as the state’s other conservation cost-share programs. Iowa’s failure to adequately fund these programs in the past has delayed needed conservation projects.

We are currently incorporating no-till practices into our farming operation. In the future we intend to install water conservation sources for livestock and plant cover crops to save nutrients and reduce wind and water erosion.  Carol Tripp
Secretary of Agriculture Northey,

Hi, I'm writing you in support of the science based nutrient reduction strategy. It seems like everyone rushes to make quick changes and in the long run it was simply bad policy.

What we need is a commitment to conservation programs! It's a shame the marginal and highly erodible land is getting plowed up and planted and will still barely make a crop! Land like this is probably what's sending the most pollution down stream. Let's get this land back into cleaning our water ways! Jason Edwards
Secretary of Agriculture Northey,

I am sending this brief note to urge you to fund the Iowa Nutrient Reduction Strategy and other conservation practices. I have terraces, filter strips, and grass waterways on the farm I own and am therefore familiar with what can be done. I am confident that the science based approach we're proposing is the correct way toward reducing nutrient losses. Larry Verdoorn
Secretary of Agriculture Northey,

I urge you to support a science-based Iowa nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

Please support legislation that will adequately fund the Iowa Nutrient Reduction Strategy, as well as the state’s other conservation cost-share programs. Iowa’s failure to adequately fund these programs in the past has delayed needed conservation projects.

Thanks for your efforts in this matter.

Gary Bickmeier  Gary Bickmeier
Secretary of Agriculture Northey,

I urge you to adequately fund the Iowa Nutrient Reduction Strategy. So it can help use as Farmer's cut your Nutrient losses and still get good crop yields. I have started to use variable rate fertilizer on some of my farms to see if I can cut some of my nutrient loss. Clarence Larson
Secretary of Agriculture Northey,

Iowa needs to be proactive with a flexible, yet effective Nutrient Management Plan before the EPA sends us one. I believe the proposal from ISU, DNR and IDALS would be so and yet is based on sound science. The agricultural industry implements new technology faster than most industries based on the economic incentive to do so. With the voluntary conservation strategies proposed Iowa farmers would be quick to implement them hopefully foregoing any new regulation in the future.

I urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state’s other conservation cost-share programs to avoid any delay in their implementation.

Iowa farmers are becoming more efficient at what they do to feed a growing world population. On my farms I use no-till farming as well as terraces, grass waterways and field borders to conserve the soil for my son and grandsons. I urge you to approve a plan like this one that will make a difference in Iowa’s water quality without regulating us out of business. Mike Fara
Secretary of Agriculture Northey,

Please support a voluntary, logical, science-based nutrient reduction strategy that farmers can economically and effectively participate in to improve water quality in our state. As a farmer, I fear the imposition of an inflexible mandate that does not account for local dynamics and individual producer's livelihoods in an effort to implement conservation measures on farms across the state. I am concerned that the state will adopt a one-size-fits-all program as has been done in the Chesapeake Bay area, which is like trying to drive a square peg into a round hole; what works for one farm does not necessarily work on another farm. As a farmer, I truly want to do my part to better utilize our nutrient resources and maintain the integrity of our state's waters--I share the same water you do and I want it to be of the highest quality possible. However, greater farmer acceptance and participation will be gained through voluntary programs and fully funding conservation programs. On our own farm, we have been no-tilling since the late 1980's; utilize waterways, filterstrips, and tile; terraces; soil testing; paddock & rotational grazing systems; and just this year we are experimenting with cover crops. We have done so voluntarily and will continue to evaluate and implement practices that show positive results and are economical to implement on our operation. Also, programs like the low-interest loan program for conservation structures have been highly popular and well-received in our area. Please work to protect our independence and develop sound programs for farmers in our state. Christopher Nelson
Secretary of Agriculture Northey,

Please support volunteer efforts toward nutrient strategy. James Dannen
While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.
Earlier this month I attended the Shelby County Farm Bureau meeting. Our Regional Manager had invited Tom Buman, of Agren, to demonstrate new software his company developed. The software develops plans for conservation practices like waterways, wetlands, and ponds. In a matter of 20 minutes Buman completed two pond estimates upon the request of one of our board members. I have never seen anything quite like this software. Buman showed several options for each location and was able to show an aerial view of the structure and pond and calculate the cost of the pond in a matter of minutes.

In all of the years of working with USDA and IDALS employees, I have never been shown any method that can give so much information to a landowner so fast. If NRCS and IDALS ever even hopes to provide adequate technical assistance to Iowa farmers and landowners, they need to start using this technology across Iowa. This software could save countless hours of valuable time, for NRCS staff and landowners as well. It could be a very effective tool to help farmers protect Iowa's water.
Secretary of Agriculture Northey,

We need to do the voluntary nutrient management plan. We can not have the feds come in and force us to do a one size fits all plan!! Lets take the bull by the horns, and fund these programs, not doing so will cost farms and the state much more money in the long term. Dave DeJong
While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

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The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.
Secretary of Agriculture Northey,

I am writing to you in support of a nutrient reduction strategy that recognizes voluntary conservation practices. Adequate funding of this and the cost-share programs help to reduce the delay of needed conservation projects.

We take pride in implementing these types of conservation practices on our farm. We have installed terraces and grassed waterways. The cost share programs for the structures make it feasible for us to use such practices. We also use no till farming on critical acres of our farms. Most recently we are using more variable rate application of nutrients on our crop land to reduce wasteful and costly over application of crop nutrients. By doing this we apply only the nutrients that the crop will use in a particular growing season. All of these efforts reduce the excess that causes pollution of our natural resources. Matt Raasch
Secretary of Agriculture Northey,

The drought that farmers went through this last year shows how varying soil types need to be managed differently. These soil types varied across counties, roads, and even across the same field, that's why voluntary conservation practices fit for the need of nutrient reduction strategy. The best person to implement a plan for farmland is the one who knows that land the best. Our farm has a lot of sandy areas and we plant these fields with rye in the fall after corn silage is harvested. We want to protect the soil from wind and water erosion throughout the winter and the rye is utilized in the spring by cows grazing it off as they calve. Rye also adds organic material to the soil as it is tilled. Corn is planted after the rye is grazed and a lower rate of fertilizer is used. Nitrogen is the only fertilizer used and at a rate of 100 units per acre. This is an example of what we do now on a voluntary basis to help our soils. Nutrient Reduction Strategy needs to be funded fully as a proactive approach to conserve Iowa's greatest asset, its productive farmland.

Length: 1087  Your code has been sent!  Rob Cousins
Secretary of Agriculture Northey,

As a farmer I understand the need for conservation that keeps our soil nutrients available for healthy crop production. I believe that my abilities are measured by my capability to feed the world which requires me to maintain a productive environment where nutrients and soil are kept in place and leaching and erosion are reduced. I personally have used many practices such as terracing, grass waterways, conservation tillage, grass buffers, along with many others to hold my nutrients where they are needed for my efficient crop production.

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

I urge you as our state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy. Iowa’s failure to adequately fund conservation programs in the past has delayed the implementation of many more needed conservation projects. Thus, I also request that you provide funding for conservation practices that preserve our great Iowa assets.

Farmers know better! We have dedicated our lives to maintaining a healthy environment. Thus, as a farmer I would like to continue to be part of the solution, but I know that new regulations aren’t the answer.

Thank you for your support of Iowa! Klint Cork
Thank you for this opportunity to comment on the Iowa Nutrient Reduction Strategy.

As you well know, far too much nitrogen and phosphorous are applied to our soil in a stupid and unsustainable effort to turbo-charge it to grow more, more, MORE.

This toxic excess flows from agricultural land into Iowa's rivers and streams, triggering dangerous algae blooms, endangering public health and is a major cause of the tragic "dead zone" in the Gulf of Mexico. All because we place too much trust and power in Big Ag (whose only priority is profit, NOT public health) and not enough in Mother Nature (whose wiser priority is sustainable, self-regulating balance).

So why does the strategy proposed by the state do so little to address such grave problems? You and I both know that, next to clean air, clean water is absolutely essential for good health. So Iowans want our water protected -- and informed (and thus outraged) citizens want to know WHY your agency's strategy so unwisely fails to make any real effort to do so.

I'm glad that the state's proposed strategy at least recommends strict new rules for cities and industry, but in my opinion, it is imperative that we address and curb agriculture's irresponsibly high contributions to the excessive nutrients in our water. For example, an accompanying science assessment outlines the well-documented effectiveness of a number of conservation practices that farm businesses can implement immediately, but the state plan neglects to recommend a minimum standard of care for farmers to follow.

I also cannot support the strategy's continuing, seemingly cynical reliance on farmers taking voluntary measures, when 40 years of this approach has done precious little to fix this serious and growing problem. That you see fit to include it in the current, toothless strategy is troubling.

In addition, your strategy needlessly puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at every level.

In my opinion: THE POLLUTERS MUST PAY. Our farmers sign iron-clad contracts with Monsanto, Cargill and their ilk, which force them to apply excessive amounts of fertilizer to their crops. (Big Ag's other dangerous, but profit-boosting demands endanger us and other species, e. g. bees, but that's for another agency.) Monsanto and all the other better-living-through-chemistry propagandists need to finally start paying back some of those handsome profits (ill-gotten gains) their reckless policies have poured into their bottomless pockets to help clean up the mess they and their selfish business tactics have made!

If a farmer doesn't follow Big Ag's profitmongering contracts to the letter, he gets his pants sued off by big corporate lawyers --- even when the farmer is trying to protect his farm and others by using better, more sustainable practices. NO MORE the makers of these fertilizers and pesticides ad nauseam should be sued instead, for forcing farmers to poison our soil, air and water and making the rest of us deal with the toxic consequences for our health!

In short, your agency's strategy as proposed takes baby steps to solve a giant and still growing problem. Please take it back to the drawing board and THINK BIG -- but not Big Ag! They've been allowed to use Iowans of all species as their guinea pigs for far too long. Dial em back to realistic and environmentally responsible levels for once and let farmers TAKE CARE of our nation's breadbasket and the rich soil and water that fill it the last thing we should do is continue to exploit these assets like slave labor!

Thanks for your time and consideration of my comments.
Secretary of Agriculture Northey,

I would like to encourage you to fully fund the Nutrient Reduction Strategy that has been proposed. This along with other cost share measures for conservation will continue to keep Iowa agriculture at the forefront of trying to protect the environment.

We have continued to build what terraces we can afford even though cost share money has not been available. We have landlords that have done the same as they want to see improvement but don't want to wait and miss good opportunities for construction. Not all the projects can be built in one season which means we need a constant stream of funding. Lance Bell
Secretary of Agriculture Northey,

I am writing to ask that you support a nutrient reduction strategy that is based on real science, not untested ideas, or theories, and that they are kept completely voluntary. Demand for our ag products remains high, and is only sure to increase. A plan that carelessly cuts our use of fertilizer will threaten our ability to meet these rising needs for food and fiber. Please work to fully fund this strategy, and keep it voluntary.

I have worked to reduce the amount of applied nutrients by applying nitrogen in the spring, versus fall application, utilizing a more frequent and extensive soil testing plan, and maintaining and improving field borders and waterways. Driving around the country, it is obvious that many of my neighbors are doing the same. Please don’t saddle us with more regulations. Thank You  Kriss Haglund
Secretary of Agriculture Northey,

I am writing to you to ask you to support a science-based state nutrient reduction strategy.

I am a farmer in Van Buren Co. We have built many terraces and waterways in the past years to help improve the quality of water here in Iowa. We would like to do more, however the list of producers requesting conservation costshare funds far exceeds the availability of the funds. This results in huge delays to the water quality improvement that we could see if there were more funds available.

A voluntary, science based approach, that leverages producers dollars would be the best approach given the huge differences in terrain from one area of Iowa to another. I would greatly appreciate your support in advancing this program. Thank you. Dennis Gratz
I have read through the proposal and am dismayed that such an important issue (to Iowa and much of the nation affected by Iowa's practices) could seriously be deemed resolvable by voluntary practices.

Agriculture is an important business in Iowa. Voluntary measures will NOT level the playing field: we can not expect that businesses will make decisions that could negatively impact their profits, knowing that other businesses are NOT making those decisions. It simply hasn't happened in the past, nor will it happen in the future.

We need a strategy that outlines specific goals, steps and legislation needed to reach those goals, and a timetable with identified measurements. We need monitors who are not politically appointed nor aligned with industries.

The long-term health of our groundwater, our state's soil (a most valuable asset) and downstream states is far too important to be considered a "voluntary" issue.

Yes, there will be some pain and that pain should be distributed. Non-farming taxpayers in Iowa certainly should have a stake and some skin in the game, and so should farmers and agricultural companies who do business in Iowa.

Please review the proposal and revise to show a good faith effort at truly resolving an issue with long-term impacts. I hope the lessons from the dust bowl era and the current crises in water shortages across the United States serve as notice that we must take this seriously.
Secretary of Agriculture Northey,

I read an article in the Farm Journal magazine yesterday that quoted Secretary Vilsack saying that farmers and their lobbies need a proactive message and to quit bickering about overregulation. Instead we should contribute to a new vision for agriculture. I think this voluntary approach to using science and research to find ways to improve water quality in Iowa would be that proactive vision that he was talking about. I encourage you to help and support this Nutrient Reduction Strategy in any way that is necessary to make it possible to do the research, so that information can be shared with other farmers and put into practice. Lauren Van Wyk
Secretary of Agriculture Northey,

As a producer and a supplier of crop inputs to agriculture I have experience on both sides of the fence. The voluntary practices that farmers have been using are based on the science and research from our Universities and Commodity Groups. They use the best input to return equation for their operation. Inputs such as fertilizer are too expensive to waste on land that does not require high rates.

The voluntary conservation practices that farmers already use are a good indication of self policing. No producer wants to see the soil washed down the streams and rivers. I myself have stream buffers that were placed long before conservation programs came into effect to cost share these projects. The education of farmers to use these on a voluntary basis is priceless. Mitchell Zumbach
Secretary of Agriculture Northey,

I write in support to adequately fund the Iowa Nutrient Reduction Strategy as well as the state's other conservation cost-share programs.

While some agricultural producers seem lax in implementing certain conservation practices, it is recognized that many voluntarily go ahead with the idea of conserving the soil and maintaining water quality.

I also have the mindset that promotes the above issues as I have installed terraces, built a pond (1981) with a silt pond presently under construction, and I am planning to install buffer strips in the near future. I have also been a no till farmer for several years.

Proper legislation to promote voluntary conservation practices that will include some funding would help the cause for nutrient reduction in our waterways. Ronald Goecke
Secretary of Agriculture Northey,

I as a Iowa farmer support a science base state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost share programs.

Mark Gjerde
Secretary of Agriculture Northey,

Iowa State University has the ability to produce science-based recommendations for a voluntary state nutrient reduction policy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

But the state has not fully funded the Iowa Nutrient Reduction Strategy, as well as the state’s other conservation cost-share programs. By not funding these conservation projects has delayed the desired results.

We borrowed money last year to built a needed pond to control runoff, cleaned out ponds, repaired waterways and built more terraces. Only part of the terraces were constructed with government funding. We VOLUNTARY use no-till, GPS variable fertilizing and continually are added terraces to control soil erosion. If Government funding is available, farmers will voluntary install and use conservations measures to improve water quality. Larry Rowley
Secretary of Agriculture Northey,

I wish to express my support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge you as state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state’s other conservation cost-share programs. Iowa’s failure to adequately fund these programs in the past has delayed needed conservation projects.

Having won local awards for conservation activities in the past I know the importance of Buffer Strips, riparian strips, terraces and waterways. We are currently looking at new practices to be put into place on several fields this year and spent several hundred dollars or our own to maintain existing practices. Your vote will help us maintain a long standing tradition of conservation and sustainability. David Van Rheenen
Iowa Nutrient Reduction Strategy
Online comment submissions

Name  David Ballou
City  Fairfield
State  Iowa

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

To not take more definitive and proactive policies, especially in the face of the current drought and potential environmental change, is irresponsible.

The state's proposed strategy falls short in many ways:

It relies entirely on the same voluntary approaches for agriculture that have failed to clean up Iowa's water.

It puts the bulk of the financial burden on taxpayers, even though profitable farm businesses are responsible for the bulk of the problem.

It fails to set any common sense standards to restrict a handful of the most polluting farming practices.

The strategy outlines no timelines, interim goals or means of measuring annual progress toward reducing agricultural pollution.

It includes no explanation of how the plans will be implemented, how problems will be prioritized or who will make these decisions.
Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices. My Father, my Grandfather, and his Father before him all practice/practiced voluntary conservation efforts because they love/loved their land. We utilize a program that we have native grasses and flowers growing all around our farm. The pheasants love it, as do other birds and animals.

Please understand, as a land owner, we want to take care of it for future generations of our family to make a living from. Why would we want to hurt it? As farmers, we do not want to have to spend more per acre than necessary, so most are frugal with what they put on and when.

Please adequately fund the Iowa Nutrient Reduction Strategy as well as the state's other conversations cost-share programs. Heather Schachtner Kramer
Secretary of Agriculture Northey,

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

I urge you as a state lawmaker to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state’s other conservation cost-share programs. Iowa’s failure to adequately fund these programs in the past has delayed needed conservation projects.

As an independent producer I have implemented numerous cost share programs such as grass water ways, terraces and rotational grazing.

Mary Mcknight
Secretary of Agriculture Northey,

I support the science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. I urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state’s other conservation cost-share programs. Iowa’s failure to adequately fund these programs in the past has delayed needed conservation projects. I believe that these conservation practices are extremely important to the future generations of Iowa agriculture. Thank you. Grant Dixon
While the state’s proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.
Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy. I feel a voluntary approach to conservation practices are important. While some of these conservation practices need to be taken on by the farmers themselves, funding for the more expensive practices are needed. I hope that the state lawmakers will keep that in mind as conservation projects are delayed from inadequate funds. David Meyer
Secretary of Agriculture Northey,

I am writing this in support of a science based nutrient reduction strategy for our state. In Iowa we place a high value on our natural resources and the private landowners here know that all will benefit from good stewardship. It needs to be voluntary and it needs to maintain production levels.

Please fund this strategy and other important cost share programs because our valuable resources are at stake and cannot be put on hold.

People are eager to make a change for the better all they need is the proper tools. Please help us get these tools. Eric Woodford
Secretary of Agriculture Northey,

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

Please adequately fund the Iowa Nutrient Reduction Strategy. Jason Franck
Secretary of Agriculture Northey,

Please continue to past legislation that just plain makes good sense for the best interests of agriculture in mind. Also keep the farmer involved with that decision process. Thanks. Keith Weller
Secretary of Agriculture Northey,

Please support and adequately fund the Iowa Nutrient Reduction Strategy as well as the state's other conservation cost-share programs.

It is important that we support this science-based nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. Jennifer Cash
The strategy being recommended to protect Iowa's waters is a start, but while the state's proposed strategy recommends strict rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

The agriculture industry is the main polluter in Iowa, yet the state strategy puts little responsibility on the industry itself. The financial burden is on the taxpayers instead. In addition, relying on voluntary measures will likely be ineffective. (On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.)

Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

And finally, the strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

It's time to take real measures, rather than provide more talk to pacify the public opinion.

We all require clean water to support life itself. What is so difficult about requiring those who pollute our waters to be responsible for and held to stopping the damage?
Secretary of Agriculture Northey,

I am writing today to ask for the legislations support for Iowa's Nutrient Strategy. As a grain farmer I sincerely support this science based nutrient reduction strategy. On our family farm we employ a multitude of conservation practices based on different topographies and soil types already and many of these practices will likely be part of this voluntary program. My point is we are already do things to conserve the land and this strategy will help measure the benefits of those current practices.

I urge you as lawmakers to adequately fund this program which is one time money that could come from our current budget surplus. Also using one time money to fund Iowa's Cost share programs that has lacked funding in the past. This too will help help fund conservation projects already planned that have been inadequately funded.

Please take time to consider these funding opportunities that will help keep our state's largest industry continue to be a leader in the world not only in production, but land stewardship. Matthew Willimack
Secretary of Agriculture Northey,

I believe it is very important that rules and regulations be carefully thought out and enacted only after careful consideration and investigation. This does appear to be the process followed in this affair. I urge all involved in this process to take into consideration all facts presented and to use common sense in arriving at a solution! Roger Dreeszen
Voluntary approaches will not work it is just a way to kick the can down the road and protect farmers and business from doing any meaningful reduction. No common sense standards will be used for the pollutants that are the most common from farming practices. The proposed strategy, which is really no strategy at all, could be better done by most Jr. High School science classes. The state plan lays out no timelines, interim goals or means of measuring progress. The financial burden is put on the taxpayers and expects us to contribute to farmers cost at all levels. This is no strategy and has already been shot down by the federal government as it should be. Maybe we should let a Jr. High class come up with a strategy... certainly would be money better spent. Sincerely, Brian Walshire
I believe it is very important for a state nutrient reduction strategy and it to offer voluntary conservation practices that will help maintain agricultural production. I have taken advantage of several opportunities for my operation. I have completely eliminated any manure run-off from my cattle. I feel it is beneficial to me, as well as, the environment that I was able to secure funding to make this possible. I am also better managing my manure hauling practices and have buffer strips along water tributaries.

These practices are very important and I urge you to fund the Nutrient Reduction Strategy, as well as other conservation cost-share programs so that others can continue to improve the state's water quality. Randy Brincks
Secretary of Agriculture Northey,

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

I urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. Anna Myers
I would like to see your support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. I believe farmers know better! They want to continue to be part of the solution, but they know that new regulations aren't the answer. I also would like to see a hard effort by all of our lawmakers to address this and other situations with no earmarks. Kevin Schechinger
Secretary of Agriculture Northey,

I am writing to express my support for the state nutrient reduction strategy.

Historically, somewhere along the lines, instead of everyone raising their own food, someone raised food for someone else, and civilization followed. It increasingly seems civilization now demands for agriculture to follow it at times. Part of this is entirely understandable, but some of those demands are best summed up in C.S. Lewis’ quote: “In a sort of ghastly simplicity we remove the organ and demand the function & We castrate and bid the geldings be fruitful.

As the world’s population continues to grow, we have a moral obligation not only to grow food for those people, but to produce it as cheaply as we can do responsibly.

It is hard to say that our current system has failed us, when the current system has not been adequately funded. And while I fully understand the problems that exist across the board in funding, the funding for our conservation programs are relatively cheap compared to some funding request out there. Cheap not just in terms of cost, but also in terms of reward. What funds the legislature makes available, there is a list of private individuals willing to match those funds and further drive value.

Even with inadequate funding, both as producers and in our family business of doing earthwork, us and our neighbors yearly build conservation structures on our own dime. Just this year, for our own operation, we’ve installed a pond and five terraces, in addition to the one pond we’ve built on our own with cost share funding. Next year we have slated several more terraces to install for ourselves on our own dime.

Just like everywhere else, one’s dollars can only go so far. Adequately funding the cost share programs would accelerate tremendously the work that will get done.

"When tillage begins, other arts follow. The farmers, therefore, are the founders of human civilization," so said Daniel Webster. I can only hope, should agriculture be able to continue to build on their own legacy of conservation, perhaps civilization will also follow that lead, one which places no expectation of government doing everything to solve the problem, rather, only their assistance. Dan Hanrahan
While the state’s proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture’s contributions to the excessive nutrients in our water. History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem. The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers’ costs at all levels. Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow. The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy. The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.
First of all, I congratulate the state agencies involved in the preparation of this document. It is obvious that it involved a huge effort to bring it to the point of publication.

Much has been made about the voluntary vs. regulatory approach to the issues involved. As Executive Director of the Iowa Drainage District Association, I want to go on record strongly in favor the voluntary approach. The world's population is growing and individuals who study these trends agree that Iowa will be expected to play a bigger and bigger role in feeding the world. The amount of land in the state is limited and that which if farmed is actually decreasing. The net result of this is that farmers will have to squeeze additional productivity out of the land that they have. Anything that erects regulatory barriers to the ability to raise crops and livestock will only serve to decrease productivity.

The IDDA believes that the non-regulatory approach recommended by this document is the correct one.
Secretary of Agriculture Northey,

Nutrient management in Iowa agriculture is critical for the healthy well-being of our state, as well as the economic impact that it has on those of us involved in agriculture. It is very important for us as farmers to have acute awareness of the impact that we are having on the environment and to voluntarily keep those around us informed of what we are doing. It is also important that we base these efforts on scientific studies, such as those from Iowa State University, and abstain from emotional responses. Personally, I go to great lengths to monitor soil fertility by soil testing every 5 acres of row crops. All manure is injected to prevent erosion. If we are to continue to make this state a leader in agriculture production, we MUST work together! Bradley Moeckly
First of all, a big thanks to all involved in writing and researching this document. It is critically important to our state and the entire Mississippi River Basin to make substantial improvements in reducing our runoff. I have 4 basic points after a brief introduction.

My life has been infused with conservation-mindedness since I can remember. My father worked for IDNR in forestry for many years and my mother had a master's in environmental education. Now, I help run a volunteer-based non-profit vegetable and fruit farm near Ames. We are buying our farm and expanding to 11 acres. At least 4 acres of that total will be committed to conservation, specifically related to easing runoff from neighboring conventional cropland. We believe in volunteerism and would do everything we could without government financial help. However, if timing and funds allow, we do hope to use EQIP to help with our field border project. Why? Public funds make sense because our conservation improvements benefit much beyond our farm. In fact, I believe the the primary benefit is beyond our farm. That is why all us farms, big or small, conventional or organic, grain/livestock/fruit-nut-vegetable, have an utmost responsibility to work towards maximizing conservation.

Point 1, then, concerning the Nutrient Reduction Strategy, is that farmers need more support, both financial and advisoral, for voluntary compliance to work. This should mainly come out of the public sector, for I distrust the impact of profit motive from the private sector. For example, Iowa State Extension should be mentioned more in the strategy and the service expanded. Perhaps also we need an Agro-ecology Department to help the farm sector in conservation expansion.

Point 2: I agree regulation is complicated and potentially burdensome, but there is smart regulation that is essential, because it helps us farmers do the right thing. Furthermore, judging by many of the local farms I see around, I believe that voluntary compliance with the goals of the Strategy will only get us so far and, if Strategy goals are not met within a certain few years, conservation compliance should become mandatory. This framework should be included in the Strategy. We need a better timeline with a sense of urgency and the threat of mandatory compliance and enforced penalties. I wish it wasn't so.

Point 3 is for the Strategy to outline better how we will monitor improvements in lessening nutrient runoff. We need to know how its going. I didn't get a clear idea of that from the 1st 2 sections. It is mentioned, but needs to be forefront and detailed.

My last point regards the awkward and confusing writing style in the 2nd section. This is especially the case on page 11 in "Challenges of Best Management Practice Adoption to Address Nonpoint Sources." It is very hard to follow. The argument is not clearly written. That section is important for it deals with fertilizer application rates, but the logic to arrive at the conclusion that application rates are an untouchable factor just doesn't add up. At best, it just confuses the point. It seems to me better application can improve the situation (at the end of the section, increased production rates with less fertilizer is touted) and, given the uncertainty of the weather and our changed landscape, it is one area we can effect. For instance, timing and amount of manure application is undeniably a critical consideration. Finally, perhaps we should consider that optimum production is not necessarily a sacred goal. Maxing production levels can bring lessing value to other parts of our lives, and I believe I'm understating that.

In tying this comment up, let me just add that I also strongly encourage the Strategy to take up the suggestions of the EPA letter to Gipp and Northey from Jan 9th. I found much in that letter that made good sense. Also, thanks for inviting comments and extending the comment period. I think the Strategy is a great idea and is off to a good start. I look forward to helping make its impact be as great as possible and evolve in a positive way.
History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.
It is unbelievable to me that we allow farmers to pollute field after field with poisonous fertilizers because after a rain, these horrible poisonous fertilizers seep into our public water sources and pollute our own individual farm wells. Isn't there something that can be used that will NOT poison field after field for miles and miles?.....Years ago the farmers used manure from cows, horses, or pigs to spread on their fields & my Grandpa told me that manure really makes the "corn grow tall!"

Probably nothing can be done to stop this "poisonous progress" that is practiced by the enlightened farmers of today's world, but I just keep hoping that somewhere, somehow and sometime this horrendous poisoning of our water supply will stop.
It is unbelievable to me that we allow farmers to pollute field after field with poisonous fertilizers because after a rain, these horrible poisonous fertilizers seep into our public water sources and pollute our own individual farm wells. Isn't there something that can be used that will NOT poison field after field for miles and miles?....Years ago the farmers used manure from cows, horses, or pigs to spread on their fields & my Grandpa told me that manure really makes the "corn grow tall"!

Probably nothing can be done to stop this "poisonous progress" that is practiced by the enlightened farmers of today's world, but I just keep hoping that somewhere, somehow and sometime this horrendous poisoning of our water supply will stop.
Secretary of Agriculture Northey,

As a farmer who voluntarily cares for the environment, I am in favor of funding the Iowa Nutrient Reduction Strategy as a means of protecting our water and natural resources. The science-based plan provides guidelines that help farmers do what is right for their own operation while meeting public desires to minimize environmental impacts. On my farm, I know the land and what practices work to help attain the goals set forth in this plan better than anyone else. That is why it is important to steer clear of rigid regulations that may not fit my situation/operation. Please provide the necessary funds to help make the Iowa Nutrient Reduction Strategy successful. Randy Dreher
Iowa's water pollution involves so many problems. Factory Farming, Pesticides, Organic standards, Amoral Political representatives, and the weakness of human nature which typically puts individual self-interest above public and environmental health. All I can say is the pristine quality of our water supply should always be of primary importance.

WATER IS LIFE!

Alison Wasielewski
Secretary of Agriculture Northey,

I support a science based state nutrient reduction strategy  Steve Kunert
Secretary of Agriculture Northey,

It is in every farmers best interest to reduce nutrient runoff on their farm. Some of the projects on the farm can become costly, so I think keeping a well funded cost share program in place will help as well as anything to encourage farmer to act. If only we could stop the 4" rains that come in twenty minutes then all our problems would be solved. Alex Krueger
How can we stop the pollution of our drinking water and farm wells? Why do farmers of today insist on using highly poisonous fertilizers that seep into the public water sources and private farm wells? My Grandpa told me he used cow & pig manure on his fields because he said that it really makes the corn grow tall!

How can such an "enlightened farmer" in today's world live with himself when he spreads field after field with POISON in the form of fertilizer? You would have to be a bit "brain-dead" not to know that when the rains come along, the water seeps into the ground taking particles of poisonous fertilizer with it into our water sources... Sooner or later we drink that poison....

How can this poisonous pollution be stopped?... Better yet, why isn't it stopped?

Well, I can make a wild guess maybe... Could it be that the rich powerful fertilizer companies do a great job of convincing the farmers to keep spreading the fertilizer poisons so they can get rich?????
Secretary of Agriculture Northey,

I am contacting you in regards to the Iowa Nutrient Reduction strategy. The state of Iowa has made significant progress in soil and water conservation in recent years. Soil erosion is down 33% from 1982 and pesticide levels are declining in streams in the corn belt. I have voluntarily used no-till and minimum til practices along with other farmers to reduce soil erosion. I have installed miles of terraces and filter strips to reduce run-off like other farmers. In my operation I have installed tile-terraces, grassed waterways and filter strips along streams. In the last 2 years I have used cover crops to protect vulnerable soils on steeper slopes.

Therefore, I urge lawmakers to adequately fund the Iowa Nutrient Reduction Strategy as well as the states other conservation cost-share programs. Voluntary participation is more appealing than regulations by government.

Joe Ledger
Secretary of Agriculture Northey,

I am asking you to support funding the Iowa Nutrient Reduction Strategy. I am a very typical farmer, we prefer to have incentives to do our best than rules and regulations to keep us from doing our worst. IDALS, the DNR and Iowa State University developed the Iowa Nutrient Reduction Strategy by using modern day science and technology.

I'm currently using no-till, inject hog manure and will be tiling and water way reconstruction hopefully this year. I believe these practices will help protect our water quality and reduce soil erosion. I believe funding the Iowa Nutrient Reduction Strategy will help farmers implement practices that work without having more regulations. Keith Johnson
The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.
Secretary of Agriculture Northey,

I am writing to urge you to support an Iowa Nutrient Reduction Strategy that not only controls and reduces nutrients that pass out of Iowa via rivers and streams but which will improve farming practices to benefit all aspect of soil and water management. Make it be local to Iowa, voluntary (with local oversight and incentives you can’t refuse), and with minimal involvement by the Feds above the county Farm Service Agency. I constructed a ten acre pond five years ago despite the negative efforts of the Army Corp of Engineers in Rock Island and the EPA in Kansas City and am totally fed up with the bureaucrats above our local level. Local support was positive and helpful. John Christensen
Secretary of Agriculture Northey,

I would like to express my support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary practices and the need to maintain agricultural production.

I also urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs.

Kevin Stender
Secretary of Agriculture Northey,

I wanted to express my support for science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. I urge you to adequately fund conservation cost-share programs because inadequate funding has delayed needed conservation projects in the past. Mathew Thome
Secretary of Agriculture Northey,

I'm asking for your support of a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

Funding this voluntary program as well as conservation cost-share programs can help us protect our farms and the rest of the environment. Dave Bolin
Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices. On our farm I have switched from conventional tillage to vertical tillage. This type of tillage reduces run-off and erosion. It leaves much more residue on the surface with only disturbing the top inch or two of soil. We have also added CRP waterways to a couple of our farms where water ran to a tile outlet. That should help nutrient run-off.

We also need to adequately fund the Iowa Nutrient Reduction Strategy and other state cost share conservation programs. Dennis Heemstra
Secretary of Agriculture Northey,

I would like to urge your support of a voluntary, science based approach to the Iowa Nutrient Reduction Strategy. Farmers care about the environment because our business depends on it. A voluntary, well-funded program will work best. Duane Ohnemus
I am truly fearful that all these herbicides are killing off our wildlife and contaminating the soil giving us higher cancer rates here!! The quail and small bird population is gone from these chemicals. Our 2 lower tier counties Davis, and Vanburen counties are plagued with cancer too!!! Mark E. Wagler
Secretary of Agriculture Northey,

I would like to take the time to encourage the adoption of the proposed voluntary conservation program. The Nutrient Reduction Strategy Fund and other cost share programs will allow farmers the opportunity to make a good fit for their farm. I myself am trying rye cover crops through EQUIP but is underfunded at this time for cost-share. Cost is an issue. Please help!

Julia Babinat  Julia Babinat
Secretary of Agriculture Northey,

I think you guys know that farmers want to do the right thing for their farms and the environment. I have no-tilled my HEL farms for several years and have installed many terraces and waterways. I feel cost share is one of the best ways to “prod” farmers to start these practices. I also feel that the NRCS needs to be careful about how much fertilizer they make us put on these terraces and waterways. They usually recommend a very high amount. In short I want to stress the importance of cost share for nutrient reduction. Gary Langbein
Thank you Mr. Chuck Isenhart for your concerns and help with this very passionate topic for me. I am a kayaker and scuba diver and love the Oceans and every body of water. I believe it is so important for our survival to keep the waterways clean and safe for everyone and every living being. I had an experience last summer paddling from the Mississippi into the Catfish Creek and suddenly realized it was in feces! The smell was horrendous and I was astounded at this! I know farming runoff is a huge problem as well. Thank you again for all your help and efforts! I wish more understood the problem and how all bodies of water lead to the precious Oceans.

Sincerely

Kristy M. Trentz
Being involved in production agriculture all my life it has become apparent voluntary nutrient management is failing society and has become a major issue of high importance in this state's future. We have got into this mess for various reasons that need immediate addressing. The framework proposed has been a failed policy except big money moving from taxpayers to others with unacceptable results. Some accountability is needed and more issues seem to just get left behind.

1) We need a balance struck between all citizens in this state. Voluntary compliance does not achieve that goal, just like voluntary speed limits on our roads do not.

2) A lot of farmers are true stewards of the land but some our not- this creates unfairness in the system. With 70% of of nitrites coming from agriculture we need all farmers involved thru mandatory compliance-period!

3) We again see in a just released document Iowans have more impaired waterways in this state than last year. Also, 1/2 of the farmers spent "0"- which challenges the integrity of voluntary compliance immediately.

4) Iowa has lost 50% of it's topsoil over the last several decades. At what futuristic point does a farmer become "unsustainable" due to soil loss? This is a social / producer /economic issue and a national security issue as per retaining the ability to feed ourselves into the future as a nation. Also, when soil moves -so do nutrients- no ones benefits...except for the agricultural industry who loves to sell massive amounts of crop production products......

5) With chronic erosion and climate change events compounding the problem of nutrient retention it will only get worse. Also, with the enchecked expansion of acreage and under-regulated CAFO's voluntary compliance looks like a feeble attempt.

6) While good actor farmers have spent time and money, taxpayers have "annied" up billions over the years, this state is more polluted than ever and has nothing to brag about...regardless of what Farm Bureau says. Also, we need to realize a new farm bill will probably not have a mandatory compliance clause to all farmers receiving 60% taxpayer funded write downs in crop insurance premiums...and some believe voluntary compliance achieves goals and solutions. ??..hogwash- lipstick on a pig!!

7) Iowa should be ashamed of being 50 of 50 in water quality and getting worse. Iowa agriculture has become more intense and industrialized over time while Farm Bureau and others have captured enough politicians, state government and it's oversight / regulatory / enforcement system (example of Farm Bureau policy in these DNR / Iowa State proposed nutrient management documents) to make it irrelevant....while taxpayers pay higher taxes, higher utilities...and citizens suffer health impacts and less economic /recreational choices due to dirty water. The game of Farm Bureau and their friends is more of the same - status quo- suck the money out of a subsidized tax payer funded system (with NO mandatory requirements) while externalizing costs, making money, and polluting. How many more years of "voluntary" compliance before the people / voters of this state wake up??...enough is enough...

8) It's time we get serious, voluntary compliance is doomed to fail. Citizen faith, trust, and confidence with politicians and the DNR to execute a voluntary nutrient management plan- let alone a mandatory one is questionable. More of the same will not cut it anymore...especially when EPA is knocking on the door.

9) Above all the citizens of this state deserve along with the farmers who are doing the right things deserve a better outcome than what has been achieved and proposed. The economic future and human health deserves and depends on mandatory compliance with teeth ...just like speed limits.
Secretary of Agriculture Northey,

I hope you will support the science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. Dan Harrison
Secretary of Agriculture Northey,

Please support voluntary efforts for conservation, we don't need more farm regulations.

I would support limiting lawn fertilizer in towns across the state knowing that much ends up in stormsewers. Dean Berte
"Voluntary regulation" is an oxymoron. Iowa will not have clean water, and take responsibility for reducing its contribution to the dead zone in the Gulf of Mexico, until it truly regulates agricultural pollution.
Secretary of Agriculture Northey,

I urge you to support a voluntary science-based state nutrient reduction strategy. I would also urge Lawmakers to fund a Nutrient Reduction Strategy along with other conservation cost-share programs.

As a member of the Agriculture community I take the responsibility of voluntary conservation practices seriously. Just a couple of the steps I have taken; include buffer strips along streams (I have two on my property) that are fenced off to keep cattle out of the streams and, soil testing of pastures on an annual bases to apply only the amount of fertilizer required to maintain maximum nutrient value(s) for livestock production.

I feel voluntary participation to implement a Nutrient Reduction Strategy will be far more effective than more regulations. Kenneth Wade
Secretary of Agriculture Northey,

I would like to make some short comments on conservation. On our farm we have implemented buffer strips along ditch banks, have reduced nitrogen application to about half per bushel than when I began farming, are using GPS to apply fertilizers and chemicals to prevent overlapping and application where nutrients are not needed, and have currently signed up for cover crops for the next two years. We are trying very hard to be as environmental as possible and would encourage you to support our voluntary science based practices and to fund them appropriately. Thank you very much for your time  Vance Bauer
Dear State Officials,

In regard to the concern about water pollution from run-off, please consider the following:

While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers’ costs at all levels.

Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

I ask that you take these things into consideration and come up with a more thought-out, conscientious plan. Thank you for your time and attention.
Secretary of Agriculture Northey,

We already have enough regs to help with these issues already. I there's problems getting them implemented put some incentives to get them solved. Steven Leazer
Secretary of Agriculture Northey,

It is very important to me that we do not allow more regulations on farms which could be very costly to farmers. I support the science-based state nutrient reduction strategy that recognizes the importance of VOLUNTARY conservation practices. And yes, we need to maintain a good strong and safe agricultural production.

I intend to pass my farm on to my children and why would I want to pass on something that I don\'t take care of to the fullest extent. I am careful to not allow topsoil to wash away because that is where the living is made. I drink rural water and I don\'t want my chemicals and fertilizers in the drinking water, and besides they are too expensive to just be negligent and allow them to wash away too.

I practice contour farming and keep my waterways in good condition as a buffer to stop top soil and its nutrients from escape. No government official or lawmaker in an office in the capital has any idea what my farm needs. I do! I farm it. More government regulations create more cost and more problems.

So please fund to some extent conservation cost-share programs to help farmers with conservation projects but do not add any more government regulations to the conservation program.

It might do well to look in other directions for some of the culprits of the runoff problem. Farmers as a general rule want to take care of their soil. However, there are many city dwellers who have free rein with herbicides and pesticides for their small plots of yards and driveways and overuse these chemicals just for cosmetic purposes which when multiplied by the millions of users can and does create a huge contribution of chemicals to the water sources. Let\'s regulate the usage of chemicals in the cities that easily run off of the concrete into the storm sewers. John Siefkas
Secretary of Agriculture Northey,

Please do not allow the IPA to burden our farmers with untold numbers of federal regulations that will not only add to the cost of farming, but will put personal emotional burdens on them as well. Yes, we need to conserve our soil now more than ever, but we also need to be sensible about it. Good farming begins with good planning. Please do everything possible to promote Iowa Nutrient Reduction programs.

Also don't forget the use of uncontrolled chemicals in the small towns and cities by people who have no training and no education on their side effects. These thousands of users also contribute to the chemical levels in the streams and rivers.

At least farmers have more at stake in making use of conservation plans to protect their land. Eddie West
Secretary of Agriculture Northey,

You should fund the voluntary conservation strategy. Richard Rosenmeyer
Secretary of Agriculture Northey,

I would just like to say that a science based nutrient reduction strategy that is voluntary would be the most appropriate means of implement conservation practices for one not all farm ground and soils are the same so its hard to tell a person with flat ground he has to contour farm and farm in the hills cant be disk ripped so everyone has to develop their own plans according to the farm and the equipment he has because if you force people in to things its no different then enforcing a very high priced tax on to a lot of people that would be bankrupcty by such measures and I now that most farmers will and do implement things that help but in their own way and time. I also urge you to fund this program as well as other cost share programs because many farmers myself included will be way more inclined to install such practices when we can afford them. Right now my landlord has a budget of so much money every year so when there is a program to help it makes installing the practices go that much futher every year. For example with out state cost share waterways I would have alot of ditches erouding their way through my fields even though I contour farm and rotate crops these help but its only part of the puzzle to improving the farm  Curtis Wilson
Response to the proposed Iowa Nutrient Reduction Strategy

Dennis Keeney
Emeritus Professor, Iowa State Univ.
Former Director, Leopold Center of Agriculture

January 15, 2013

Iowa has over 36 million acres of land, and over 90% of this land is in agriculture. About 14 million acres are in corn, and 8.5 million acres in soybeans, with amounts varying depending on markets and weather. So on a given year, about 2/3 of Iowa’s agricultural land is in annual row crops. As we know from decades of research and demonstrations, wind and water erosion from row crop lands is notoriously difficult to control. Soil erosion primarily by water, exceeds by several times the rate of reforming of the top soil, a trend that has continued since the state was first converted to annual agricultural crops. This eroded soil contains pesticides and phosphorus that causes algae growth and leads to rapid loss in surface water quality. The waters flowing through the soil contain nitrate that causes health issues with Iowa’s drinking water and is directly linked to the increasing rates of hypoxia occurring in the Northern Gulf of Mexico.

A just released scientific study by a team headed by Dr. John Downing, a noted ecologist at Iowa State University, also showed that Iowa lakes are being filled with the eroded soil (sediment) at an accelerating rate despite the widespread soil conservation efforts. Alarmingly, the rate of accumulation is increasing, to more 4 times the rate in 1900. It now takes only about 4 years for an inch of sediment to accumulate, which is the equivalent of about 50 dump truck loads of soil each year in each lake in Iowa. (The study can be accessed at Iowa State University News Service and was published in the peer-reviewed journal PLOS ONE.)

Control of the runoff and leaching from Iowa’s cropland has failed. It is not for lack of knowledge or well-meaning efforts. Indeed, this was the main reason the Leopold Center for Sustainable Agriculture was established by the Iowa General Assembly in 1987. The Center has in conjunction with many Iowa research and educational units sponsored leading research on nutrient reduction strategies including the Bear Creek Watershed (the poster for many erosion control studies in Iowa) and the nationally acclaimed Long-term study shows many benefits of longer rotations), another study published in the peer-reviewed Journal PLOS ONE.

There are many economic and social reasons for the failures of Iowa agriculture to protect its soil base and water resources. The huge number of moving parts mean focusing on one area is doomed to failure.

Let me recall the merry-go-round of activities over the last 35 years.

In 1989, the Iowa Fertilizer and Chemical Association stated common belief that soil erosion will be controlled because of the 1985 Food Security Act that requires cross compliance (that is, to receive Federal program benefits, or Federal crop insurance, soil erosion must be controlled); we all know how quickly this requirement disappeared and it was almost never enforced anyway. The sticks and carrots approach just did not work. The IFCA tried, and its heart was in the right place, but the elephant called non-point pollution proved impossible to reverse.

There were other attempts over the years. A 1999-2000 report by the Iowa Nutrient Management Task Force (originally formed in 1991) and involving Agriculture, University, and Government Officials called for reviewing available information. They point out that many Iowa streams cannot meet proposed EPA standards and called for reasonable standards. The report spent considerable time questioning the science of hypoxia. It identified sixteen Best Management Practices (BMPs) that can be effective in nutrient reduction. They called for educational programs, demonstration projects and technical assistance to implement these BMPs. Voluntary cooperation was emphasized.

In 2001 the Iowa Watershed Task Force issued a similar report. However, it was more watersheds based, included flood control, and charted a 10-year (to 2010) plan including identifying five watershed model watersheds to concentrate efforts and demonstrate success.
The current Iowa Nutrient Reduction Strategy is another good effort to put a finger in the dike but in the end will not result in any progress, it is like a broken record of old, playing the same tune time and time again. True, it is more technology based than ever, but it shows no indication that the farmer, the landowner (often absentee) will be part of the solution. Iowa agriculture becomes a data stream, not responsive to real needs, differences in goals, and even land uses.

I am as frustrated as most when it comes to providing real solutions. It is hard when each area of the state will need different strategies, and each farm will be different. And what might work in an average year will fail when torrential rains come at the wrong time. Several, including Dr. Rick Cruse, Iowa State, have found that the change in rainfall pattern is one of the reasons for accelerated erosion in recent years.

As long as Iowa continues its current path, the proffered technical strategies are doomed to do nothing, they won’t really fail, they just won’t make much difference and the trend will continue.

It is how we use the land that counts. And we all know that the greatly increased demand for grains, causing increased prices, is driving Iowa further in the wrong direction when it comes to significantly controlling non point source pollution. To make a real change means getting out of the system that has gotten the state into in the first place. Instead of continuously calling for the same old BMPs let’s put our collective heads together and look for new solutions. The proposal by the Iowa Environmental Council calling for implementation by farmers of basic stewardship plans on erosive land by farmers working with conservation planners, and to encourage farmers to participate with cities and industries in watershed-based planning should be considered.

It is time to propose bold new plans to take the initiative and reverse the decline in water quality and increased soil erosion in Iowa.

Conservation is getting nowhere because it is incompatible with our Abrahamic concept of land. We abuse land because we regard it as a commodity belonging to us. When we see land as a community to which we belong, we may begin to use it with love and respect.

Dennis Keeney
Ames, IA
Iowa Nutrient Reduction Strategy
Online comment submissions

Providing comment on the following sections:

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

Name  John Laflen
City  
State  

Secretary of Agriculture Northey,

Disclaimer: I retired from the USDA-ARS to a farm in Northern Iowa. I performed research in Iowa and other states related to soil erosion and runoff water quality. Much of this work is cited in the nutrient reduction strategies. I was a coauthor of a report in earlier work relating to the Hypoxia work.

I am strongly in favor of voluntary practices to accomplish the nutrient reduction strategies to reach Hypoxia goals. The key is that we must have practices that pay for themselves, that make economic sense to individual farmers if farmers are to adopt them and we are to meet hypoxia reduction goals.

And, whatever practices are adopted must maintain the highest productivity possible. We need this production to meet national and international needs for food, fiber and energy.

We have demonstrated that farmers will voluntarily adopt systems that reduce soil erosion. This was demonstrated by the rapid and voluntary acceptance of conservation tillage. But, this was because the conservation tillage systems were more profitable than the earlier conventional systems. It made economic sense for the farmer to adopt conservation tillage system—it increased his income and profits.

And, farmers will voluntarily adopt practices that reduce nutrient losses if they make economic sense to the individual farmer. If the practices required to meet hypoxia goals do not make economic sense, they won’t be adopted voluntarily.

In my view, we should do two things to insure voluntary adoption of erosion and nutrient loss reduction practices:

1. Develop practices that reduce soil erosion and nutrient loss that will meet our goals for Hypoxia reduction and that make economic sense to farmers considering adopting them.

2. For those cases where we have not been successful in meeting our goals for Hypoxia reduction through the development of profitable conservation systems, reimburse farmers for their costs of adoption of these unprofitable practices to control hypoxia.

I would encourage Iowa lawmakers to support cost sharing of needed but unprofitable conservation practices in critical areas. I would also encourage them to fully fund critical research in developing new practices that will control soil erosion and nutrient losses. John Laflen
Please do some research on what effect all the field tile is having on the flooding and pollution. I have seen fields that used to be a little soggy in the spring - I dont know if they would have exactly been called wetlands- that have been tiled... tiled again... and some on the third time being tiled now, in say the last 20 years. I cant help but think that it is too much. Is anyone keeping track of the miles of plastic laid?

I hate it that my sons would like to move out of Iowa because the fishing has gotten so bad around here because of pollution, cutting the trees over the creeks so now the streams rivers are warmer, and the silt. Sad.

Is there anything that common citizens can do, aside from not spraying lawns with bug spray and fertilizer, and wasteful watering? I personally would like to see a rule that you cant use fresh water to irrigate lawns. Either grey water or collected rain water.

Thank you for taking comments, tho I think it could have been better advertised. I would not have known about it except to a letter to the Editor about the extension date.

Thank you.
Secretary of Agriculture Northey,

This such an important issue. Please support a science based nutrient reduction strategy that supports the importance of voluntary conservation practices. Producers would embrace voluntary options for this. More regulations are not the answer.

If the state nutrient reduction strategy and other cost-share conservation programs are not adequately funded, then delays follow and producers cannot get projects finished when they need to be finished.

Our farm has participated in the CRP program, waterway programs, and headland programs to help control nutrient runoff. Without the help of funding, these projects would have been very expensive and may not have been implemented or finished. Lynn Stamp
Secretary of Agriculture Northey,

I urge you to make the adequate funding of the Iowa Nutrient Reduction Strategy a top priority.

We must have a science-based strategy that recognizes the importance of maintaining agricultural production while utilizing voluntary conservation practices as much as possible in a cost-effective manner. A blanket-based approach will not work.

I realize some people do not trust voluntary approaches, but as a farmer I realize the importance of protecting our precious resources, as well as the extra costs that may be incurred by ignoring conservation practices. David Bruning
Iowa Nutrient Reduction Strategy

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I would like to express my support for a science based state nutrient reduction strategy recognizing the importance of voluntary conservation practices and the need to maintain agricultural production. I would like to urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state’s other conservation cost-share programs.

There are many variables that need to be considered in conservation programs. Geography, farming practices, weather, etc. As other parts of the country have proven, there is no one-size-fits-all initiative that will benefit agricultural production in Iowa. Personally, being mindful of tillage practices and manure application requirements are two things that we are very mindful of on our farm. We are evaluating our conservation practices on a yearly basis and VOLUNTARILY making adjustments where we see fit, even if they may effect production. It’s evident as you drive around, that our neighbors are doing the same, it is our priority to be good stewards of the land. Justin Wellik
Secretary of Agriculture Northey,

Please support funding the Iowa Nutrient Reduction Strategy. I think it's great that we are trying to take a proactive approach to EPA's criticism of our water quality and runoff potential by using this science based strategy. Funding this strategy will keep Iowa's and the entire Mississippi River watershed cleaner.

This strategy is voluntary and it needs to stay that way. Forcing a one size fits all type of rule will not work, everyone's farming operations are too diverse. There is a long list of conservation practices I have voluntarily implemented to help reduce nutrient runoff. Contour farming, terraces, no-till and minimum till, filter strips, and waterways are some that have been used on my farm. A recent improvement I have made is a low disturbance liquid manure injector that I invested in. I hope to add other conservation practices in the future as well. These are all working for me, but other places it may not, just as there are other practices that may not work on my farm either.

There has been a backlog of approved conservation improvements not being completed due to lack of funding. These are from farmers that wish to improve their practices, but cannot because they are not able to afford it on their own. Using a small portion of the $800 million ending fund balance for conservation improvements and this strategy is an excellent one time use for some of these funds.

Please adequately fund the Iowa Nutrient Reduction Strategy and support improving Iowa's watersheds! Benjamin Johnson
Secretary of Agriculture Northey,

As farmers in rural Dickinson County we support for a science-based state nutrient reduction strategy. It needs to recognize the importance of voluntary conservation practices and it needs to maintain agricultural production. This is something that is very valuable in our county.

We need you as state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy. Along with the state’s other conservation cost-share programs, Iowa’s failure to adequately fund these programs in the past has delayed many needed conservation projects.

We continue to practice conservation tillage and manure filtration practices for our livestock facilities. We are look out for new and more environmentally friendly practices. Brian Peck
Secretary of Agriculture Northey,

I am writing to show my support for a science based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agriculture production.

I am urging you to vote to fully fund the Iowa Nutrient Reduction Strategy including the state's other conservation cost share programs. Iowa's failure to fund these programs in the past has delayed needed conservation projects.

Iowa's farmers understand the importance of nutrient conservation and voluntary programs will allow farmers to suit the program to their farm's soil type, rather than a one size fits all program that may not work for everyone. Thad Nearmyer
Secretary of Agriculture Northey,

I would like to voice my support again for the state's nutrient reduction strategy. We all care about water quality, but there is no one solution that can solve every issue. That is why voluntary conservation practices are important to allow producers to use what works on their farm. Too many times we have seen regulatory action have unintended consequences.

On our farm we've installed terraces, ponds, silt dams and waterways. I also use no-till on 100% of our acres, use crop rotations and rotational grazing. I can tell you it pains us more than anyone after a large rain to see evidence of erosion on our farm and immediately look for ways to correct it. When producing a crop, there will always be a risk, but I feel great strides are being made.

That is why it is important to fund the Nutrient Reduction Strategy and also help reduce backlog of conservation projects already identified in the cost share programs. I believe this strategy is so much more desirable than the heavy hand of the EPA coming into Iowa and telling the state what to do. Jeffrey Koch
Secretary of Agriculture Northey,

I am in support of the science-based state nutrient reduction strategy for the State of Iowa. Having these programs that are voluntary will allow us as farmers to implement them as we need to and which ones that pertain to each farmer.

The Iowa Nutrient Reduction Strategy needs to be funded to help protect our most precious assets—our soil and water. Each farmer has his own ways of farming and each one’s fertilizer needs, tillage practices cannot be put into a one size fits all program.

On my farming operation I already do variable rate fertilizer, split applying nitrogen and prescription plant corn hybrids. Taking care of the land is my responsibility and if taken care of properly it will benefit my farming operation for many years to come.

Thank you for taking the time to read this letter and I encourage you to support and fund this strategy. Gregory Jochum
Secretary of Agriculture Northey,

Many farmers are very aware of the need to protect our land and water. This is very evident as you drive across rural Iowa. There have been many terraces, ponds built and waterways seeded in the last five years with many farmers spending their own money without funds from government.

In my own operation, I have cleaned out an old pond and seeded down hillsides to alfalfa. I do this because I want to protect my land and the water that comes off of it.

So please fund the Nutrient Reduction Strategy so we can take conservation to the next level. Danny Furlin Jr
Secretary of Agriculture Northey,

I strongly urge your support of the Iowa Nutrient Reduction Strategy. What better plan is there than this developed by Iowa Department of Agriculture and Land Stewardship, Iowa Department of Natural Resources, and Iowa State University, using science and technology based approach. By using Iowa State University research we know what works and what doesn't. By funding this program and other voluntary conservation practices it should have a big impact on water quality in the state. I myself have put in grass waterways. The neighbor saw the benefits of having the waterway and put one in himself on his farm next door. Its important to protect these valuable resources for production agriculture. So please adequately fund this program and others to protect our resources. Leland Meitner
Secretary of Agriculture Northey,

Let's be proactive on this issue. We don't need someone in DC making our decisions for us. Kirk Anderson
Secretary of Agriculture Northey,

I would like to let you know that I support the science based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge you to fund the Iowa Nutrient Reduction Strategy along with the states other conservation cost-share programs. Iowa's failure to fund these programs in the past has delayed needed conservation projects.

Through the Hewitt Creek Water Shed Project, I take a nitrate test on our corn to see if we are over applying nitrogen. I also currently plant cover crops in the fall to prevent soil erosion. We also have a manure management plan in place. Wayne Kramer
Secretary of Agriculture Northey,

I recently listened to an Iowa Nutrient Strategy presentation given by Matt Helmers at an Iowa State Extension meeting. His presentation gave the detailed assessment of what it will take to reduce Nitrogen and Phosphorus going out of Iowa. It was very evident that a one size fits all plan will not work well in Iowa due to our different soils and land use. It was amazing how much work had but put into this assessment and the suggestions of what we could do in Iowa to reduce Nitrogen and Phosphorous levels leaving our state.

I serve on a committee with several farmers in the Chesapeake Bay watershed. I have heard there troubles of regulations being put in place by the EPA. Many of the regulations did not make sense for everybody in the watershed. I would much rather people in Iowa had a plan, rather than those in Washington DC.

I encourage your support to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state’s other conservation cost-share programs. Iowa’s failure to adequately fund these programs in the past has delayed needed conservation projects. I know in our county the waiting list for cost share is several years. I have used cost share dollars to help with the construction cost of building terraces on my own farm and have greatly appreciated the help. Without the cost share program landowners will not build as many or any erosion reducing structures.

Thank you for your support of the Iowa Nutrient Reduction Strategy. Tim Kaldenberg
Secretary of Agriculture Northey,

I am writing to encourage you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state’s other conservation cost-share programs. Iowa is being pro-active in their response to address the issue at hand. Iowa farmers ARE good stewards of their land and this program put together by Iowa institutes allows us to show the nation this very fact. We want to take care of our resources now and in the future.

We have been no-till farming for many years and many comment on the lack of run-off on our farms. We soil test so as to not over fertilize. In my opinion, the forcing of farming practices would only create problems. I think Iowa farmers care about their farm and the future of the land enough to inform themselves and implement the best plan for each area and farm.

The Nutrient Strategy system seems to be a very excellent plan allowing farmers to pride themselves into good conservation plans.

Thank you for taking my comments into consideration. Beth McGrath
I feel it is extremely important to protect our natural resources in order to promote quality of life standards. We need to preserve what clean waterways we have now and continue to restore waterways that have been damaged in the past through careless land use practices. There needs to be more educational programs to promote better conservation efforts, and assistance made available to parties interested in making changes to reverse poor conservation practices. Along with training and assistance there should be consequences for those who are reckless and irresponsible for their actions.
Iowa Nutrient Reduction Strategy

Providing comment on the following sections:

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

Name  Norlin Mommsen
City
State

Secretary of Agriculture Northey,

I urge you to adequately fund the Iowa Nutrient Strategy. Using science and not emotion is the only sound approach that should be used to address the nutrient issues that face Iowa agriculture today. This approach will assure us that the desired reductions can be achieved. The funding is the key to making this strategy work.

In agriculture we have a long history of using voluntary programs to protect the environment while maintaining productivity. This strategy needs to be continued. Norlin Mommsen
Secretary of Agriculture Northey,

I strongly urge funding of conservation practices to keep farmers doing the right conservation practices on their farms. On our farm we buffer strips along our creek as do our neighbors for almost 1.75 miles. We have grass waterways where needed and headlands on our hilly ground for end rows to control erosion. We use minimum till for our corn and no-till our soybeans to conserve soil. Many farmers our using many voluntary practices on thier farms currently and will continue them in the future. Please help fund the Nutrient Reduction Strategy to help farmers maintain agricultural production in a cost effective way. Chad Adams
Secretory of Agriculture Northey,

I urge you to support a science based state nutrient reduction strategy, that is properly funded. This would help farmers to voluntarily implement the conservation practices that are needed to help maintain the agricultural production that the World's population needs. I and my family own over 1000 acres that are properly terraced. We also have '638's where needed, if the neighbors agreed to them. These practices help to conserve water and nutrients. We also farm using no-till practices. In closing, I again urge you to support this program and the funding necessary to install the conservation practices needed to make the program work. Kenneth Gard
Secretary of Agriculture Northey,

I want to know I and others support voluntary nutrient reduction, conservation practices to keep us safe. This will not overwhelm the family farm. Chad Means
Iowa Nutrient Reduction Strategy
Online comment submissions

Name John Finneseth
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am in support of having water control measures in place however they need to be done without infringing on the rights of farmers. We cannot blame all the problems on one set of people. As a farmer we have set of many conservation practices with buffer strips, management of chemicals, and good practices of where we put tile. I hope you will recognize that most farmers are good land stewards and they care about the environment. I also hope you recognize that if given to much power the government will start stepping on the rights of the farmer to make there own decisions about there land. John Finneseth
Secretary of Agriculture Northey,

have filter stripes and headlands in place on my own. would like to do more but need assistance with cost of land so high. more farmers would do the same.  robert shatek
Secretary of Agriculture Northey,

I am a farmer in Delaware county Iowa. I fully support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge state lawmakers to fully fund the Iowa Nutrient Reduction Strategy as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

I have been involved in wetland reserve programs in the past and look forward to participating in other conservation programs in the future.

Kevin Maloney
Secretary of Agriculture Northey,

As an 4th generation Iowa farmer I believe it is very important to support science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

It is vital to adequately fund the Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these program in the past has delayed needed conservation projects.

I have implemented farming conservation practices on my own to insure I am a good steward of the land. Things like reducing tillage, adding and repairing waterways, and variable rate fertilizer application just to name a few. In the future I hope to reduce fertilizer to only what my crop needs and moving to an even less tillage to reduce erosion. Sustaining my way of life is important to me and my family. I hope to pass on the family farm ground to the next generation in the same or better condition. Ryan Burns
Reduction of nitrogen and phosphorus runoff is extremely important and urgent. Since the vast majority of the nitrogen and phosphorus that goes from Iowa through the Mississippi river to the dead zone comes from agricultural non-point sources, it is clearly inadequate to have a strictly voluntary policy for this source of nutrient pollution. As Also Leopold pointed out in The Sand County Almanac, under a volunteer system the majority of farmers will always take those actions that provide a financial benefit for themselves and avoid those that come with a cost. It has been objected that having requirements is not workable because the appropriate actions differ according to the type of soil and land formations present on each individual farm. But this only means that the requirements should not be so specific that a farmer is forced to do things that are not right for his or her land. Each farmer should be expected to have a plan to reduce nutrient runoff and to be able to show that the actions in the plan have been and are being carried out. The plan could be selected from a list of model plans for different circumstances, or the farmer could blend the model plans in special cases. As the EPA has said, numerical goals should be included. Experts have said that it is possible to devise regulations that are workable, and this is too important to leave to chance.
Secretary of Agriculture Northey,

I am writing today in support of the IDALS and DNR conservation plan for the Iowa Nutrient Reduction Strategy. As you know this plan is designed to reduce waste nutrients in surface water from both point and nonpoint sources. This proposed plan or strategy uses scientific, reasonable and cost effective measures.

In my farming operation, we have already utilized policies that reduce waste runoff. We do not apply fertilizer in the fall and we only apply it if the field needs it. When we do apply fertilizer we only apply at the rate of what is called crop removal. Crop removal is the level of fertilizer that crop would use for a normal year. Crop removal takes into account the level that is already in the soil. We already utilize GPS to guide where it is applied. In the future, our farming operation will use GPS not only to guide application but vary the rate or amount applied. This will serve two purposes of keeping rates and cost down and reducing waste or runoff.

We have planted grass waterways in our fields and grass buffers along streams. This reduces the amount of waste that can get into the water source. Also, in areas that can be hayed has added income to us and benefitted the livestock producers in the area.

We need to evolve a plan that works for everyone; farmer, urbanite, and city. No one person or group is responsible for the problem in the gulf. Together we can reduce the nutrient load that is discharged into Iowa’s rivers and ends up in the gulf. Many people are pointing their fingers at the farmer because he is an easy target. Cities contribute to the problem by their waste water plants. Individual city people contribute to the problem by the idea that fertilizing their lawn if little is all you need, use more is better, I can afford it.

The IDALS and DNR plan is the best plan so far so let’s keep with it. Mark Riesselman
Secretary of Agriculture Northey,

I am asking for your support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I also hope that you will work to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state’s other conservation cost-share programs. Iowa’s failure to adequately fund these programs in the past has delayed needed conservation projects.

I have had the opportunity to work with farmers - that have made sincere efforts to conserve our soil and protect our water, and hope that you can provide the support to make this strategy work.

The future of water quality protection in Iowa is in your hands! Thank you for taking action!

Sincerely, Scott Osborn
Secretary of Agriculture Northey,

I support the need for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. The state needs to have a trial period with voluntary conservation implementation. If this does not work, mandated conservation practices should be implemented.

I urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state’s other conservation cost-share programs. Iowa’s failure to adequately fund these programs in the past has delayed needed conservation projects. Again, funding is the key issue that does not get the support by lawmakers.

I know individuals that have implemented voluntary conservation practices. They are anticipating to implement more practices in the future to benefit their farm and the surrounding environment. Jamie Waddingham
Secretary of Agriculture Northey,

I am a 3rd generation grain and livestock farmer in Cedar County, Iowa. Doing our part to maintain good water quality for our community has always been a priority of our farm.

I strongly feel that maintaining good water quality starts with employing farming practices which reduce water runoff and erosion of our precious top soil. I have basically been involved with tilling and planting row crops for 30 years. Our farming practices have changed markedly during that stretch of time. Today, we are basically 70 percent no-till and 30 percent conservation till.

We have installed 3 different terracing projects, 2 miles of filter strips along streams, and have reconstructed numerous waterways all in an effort to reduce and or filter any potential nutrient run-off. For at least one half of the past 20 years our operation has been involved in an EQUIP or state funded cost share project.

During that same span of time our crop residue and soil organic matter have steadily increased. This slows water runoff from our farms and increases nutrient tie up. Through the use of GPS soil testing, fertilizer application rates have been adjusted to insure that we are applying only what we need. Atrazine and other chemical application rates have been refined to reduce potential carry overs in the soil.

Here is the bottom line. When we take care of our top soil, we ensure a sustainable production system for years to come. When we apply nutrients and chemicals on a prescription basis, we use less and have more profit in the end. My goal is to have a 4th generation farming operation for my family down the road. Voluntary nutrient conservation practices will help to assure that this goal is met.

Getting in front of this issue on a voluntary basis only makes good sense. We may need a little help from our county NRCS offices. The good news is that that component of the infrastructure is already in place.

Sincerely,

Nolan Ford  Nolan Ford
Secretary of Agriculture Northey,

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

Please fund the Iowa Nutrient Reduction Strategy, as well as the state’s other conservation cost-share programs. Iowa’s failure to adequately fund these programs in the past has delayed needed conservation projects. Bonnie Vos
Water pollution already is rampant here in Iowa. This is far too permanent a situation to be essentially ignored.
Secretary of Agriculture Northey,

I am in favor of voluntary nutrient reduction in Iowa. If this is ever becomes mandatory then I hope the cost of compliance is shared by the State and EPA. Everyone wants clean water, farmers will do what we can if there is a problem. David Larson
Secretary of Agriculture Northey,

This is a great chance to have a law here in Iowa that, to my understanding, is like no other state nutrient law. Iowa’s law makes sense!! Using science makes sense.

On my own farm, I have gone through great lengths to keep my dirt, and my fertilizer on my farm. I have installed many terraces with drop inlets, one of which is nearly 1/2 mile long. I have installed 3 new drop inlets in the last year. On the 80 that my home is on, not one drop of rainfall does not go through a drop inlet or one of my three ponds. I use conservation tillage to keep from losing soil and nutrients.

What we farmers need is for the government to help fund our conservation practices and this new nutrient law. Once again, thank you for coming up with a GOOD new law that actually makes sense!! Neil Johnson
Secretary of Agriculture Northey,

I support the science-based state reduction strategy for the future of our state. Funding for the program not only needs to be supported by the state and also by the farmers working the land. Land owners need to take responsibility for their farms conservation practices. In the past, the government had a conservation program on tillage, crop rotation, buffer strips, and boarders. Where did that program go; down the river like the soil.” Farmers not implementing conservation on their land need to be fined; not given a government check. In the past, I have seeded water-ways where need to be and rotated with hay and corn. In the fall we seed winter wheat on bare soil. Leo Kluesner
The scientific foundation of the nonpoint source nutrient reduction strategy, along with the preliminary economic analysis, is impressive. I manage my family's farm and I am aware of the general opinions among farmers and organizations like the Farm Bureau. They want the strategy to be voluntary. While I sympathize with them, a close reading will reveal that most of the strategies that are both effective and reliable involve the use of strategies that take land out of production or call for measures that reduce N runoff but do not return N to the field. I do not believe a purely voluntary system, one without penalties or incentives, will be effective. It would, in effect, penalize those who are most conscientious.

Penalties should be a last resort. I would urge the state to invest in potential incentive-based programs for N and P reduction. Some of the ideas you could pursue would be tax reductions for growers who implement strategies that have upfront costs or take land out of production, crop subsidies for those with low Nitrate runoff, inheritance tax relief for farmers who preserve the land for the future, and “Nitrogen Co-ops” that market cover crop seeds and provide services aimed at reduced N (“rescue nitrogen method”).
While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water. History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.
I agree with the technology-based approach in the IDNR nutrient reduction strategy as a reasonable and cost-effective plan for point source stakeholders.

The initial base limits of 10 mg/L of nitrogen and 1 mg/l of phosphorus should be cost-effectively achieved by most current treatment technology by most facilities.

I especially agree with how compliance will be determined. Monthly limits are necessary as a measurement tool for treatment performance. I support the IDNR approach of establishing compliance on an annual average rather than by monthly limits.
Secretary of Agriculture Northey,

Please continue to support agriculture in the great state of Iowa by supporting a science based state nutrient reduction strategy and voluntary conservation practices.

We need to fund the Nutrient Reduction strategy as well as all other conservation cost share programs, so we don't have any delays in needed conservation projects like we have seen in the past. Adam White
Secretary of Agriculture Northey,

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

 Adequately fund the Iowa Nutrient Reduction Strategy, as well as the state’s other conservation cost-share programs. Our failure as a state to adequately fund these programs in the past has delayed needed conservation projects.  Luke Cline
Secretary of Agriculture Northey,

We would ask that you would support science-based nutrient reduction. Farmers need to have these programs funded so we can show the research that they work. Voluntary conservation practices that farmers are using help to reduce run off of nutrient. The support is necessary so a one size fits all doesn't come in to play. Thanks David Griesse
Iowa Nutrient Reduction Strategy
Online comment submissions

Name: Sherman Needham
City: 
State: 

Providing comment on the following sections:
- X Executive Summary
- X Policy
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Timestamp: 1/16/2013 10:41

Secretary of Agriculture Northey,

I believe that Iowa has a good record of framers putting conservation practices in-place on a voluntary bases.

With a renewed push this year for additional efforts to implement conservation practices and structures I would urge that we adequately fund the Iowa Nutrient Reduction Strategy, as well as the state’s other conservation cost-share programs.

I have implemented no till planting and the use of winter cover crops to reduce soil and nutrient loss. There is more that I would like to do as well. Sherman Needham
Secretary of Agriculture Northey,

Please support science based State nutrient reduction strategy that recognizes the importance of voluntary conversation practices and the need to maintain agriculture production. Dennis Kruger
Secretary of Agriculture Northey,

Land in Iowa is very valuable today. We need to protect the land through using voluntary conservation practices. These practices need to be supplemented through cost-share programs. The cost-share assists landowners to complete needed practices and accomplish more of such needed practices.

If Iowa fails to adequately fund cost share and other nutrient reduction programs, Iowa as a whole will hurt due to delaying needed conservation projects as well as washing high quality soils away.

On my family farm, my father and grandfather have implemented many voluntary conservation practices of grade stabilization structures and terraces. I hope to implement such projects in the future. Being a good steward of the land, I will go forth with planned conservation practices, but state cost-share will assist me in accomplishing more.

Please adequately fund the Iowa Nutrient Reduction Strategy and other conservation cost-share programs. Blake Anderson
Many ag producers fail to apply their nutrients based on a nutrient management system. With actual current soil tests, real yield goals, and an educated and judicious application rate I think a great reduction in non-point sources of nutrients could be achieved. Because there are voluntary programs to assist ag producers with getting and using a nutrient management system, and have been for a while now, I suggest that the Nutrient Reduction Strategy seriously consider requiring a nutrient management system, based on scientific data, from every farmer who applies nutrients to their farm in Iowa. The voluntary system has been an option that many have chosen NOT to do, and it is not working.
Secretary of Agriculture Northey,

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

We need to adequately fund the Iowa Nutrient Reduction Strategy, without funding and research there is no guarantees that limiting nutrients or practices will even have an impact.

If there is any question to look into it would be... Does Field Tile reduce nutrient run-off? With proper funding and research these questions can be answered.

We as farmers aren't dumping or overloading our farms with fertilizer. Most farmers only put on what they have too, to raise a "good" crop. In fact many farmers such as myself use variable rate applications based on our soil sample results. Limiting nutrients will greatly effect the bottom line of iowa's farmers. Ryan Woebbeking
Secretary of Agriculture Northey,

In my area a voluntary solution to nutrient reduction is the favored system. No two farms, or hill sides, or waterways are the same. Therefore no one solution will be a good fit for all locations. A reduction plan that is based on science and has producer support will have a better long term chance of success.

Equally important is the funding for all of the state's conservation practices. In my area there would be miles more terraces if the funding was there to meet the desire to build. The same holds true for other practices. Please fully fund the cost share programs in place.

I have built water ways and would build more, but I am on a waiting list for funds. I am exploring more no till practices on my farm now and hope to do more in the future. Darwyn Bettin
Secretary of Agriculture Northey,

I would ask your support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

Please adequately fund the Iowa Nutrient Reduction Strategy, as well as the state’s other conservation cost-share programs. Iowa’s failure to adequately fund these programs in the past has delayed needed conservation projects.

A voluntary program is much more preferred than more costly regulation. The voluntary practices I have implemented on my farm include no-till, strip-till, terraces, grass waterways, grid soil sampling and GPS fertilizer application, manure sampling. All these practices not only make sense for nutrient reduction, but also benefits my bottom line. Please act on voluntary measures to eliminate the threat of more regulations.

Please contact me if you would like to learn more about the practices I have implemented on my farm. Mike VerSteeg
Secretary of Agriculture Northey,

I urge our legislators not to impossible new regulations to improve our water quality. I believe water quality can be improved voluntary by using Iowa's science-based, nutrient reduction strategy. The programs should be funded by current state and federal agencies that are in the strategies. Farmers continue to improve their management practices which improve water quality. ron Kilburg
I am writing in comment to the Iowa Nutrient Reduction Strategy draft, released November 2012. A state level strategy focused on Iowa’s water quality is greatly needed. The partnership forged between IDALS, IDNR and ISU-CALS is to be commended for taking the first step. I am confident that this partnership provides the critical institutional support required to assemble the diversity of stakeholders that needs to be at the table for the task of improving water quality in Iowa.

The draft document provides a thorough overview of the current science regarding water quality management practices. However, with respect to non-point source nutrients—namely those of agricultural origin—an actionable strategy is profoundly lacking. Understanding that structured decision making is an iterative process, the strategy draft can serve as a tool kit moving forward. Now we need a step-wise plan for getting these and other changes implemented. We need leadership for getting boots on the ground.

The draft is described as being a science and technology based approach, and indeed it is. Regrettably land management is inherently more than that. The authors from ISU-CALS overlooked multiple disciplines at their disposal that could have provided invaluable insight into the creation of a tangible nutrient reduction strategy. For example, within CALS there are professors of rural sociology that have published on the adoption of agricultural practices, on the diffusion of innovations, and even on watershed work in Iowa; their work is not cited, nor is there a plan for facilitating the widespread adoption of the practices discussed. Likewise, there are professors of ecosystem management; their work is not cited, nor are the tenets they teach considered. Overall, the science regarding farmers and citizens was not included and these people are similarly ignored in the plan of action.

The draft calls for a voluntary approach for ameliorating corn and bean agriculture’s negative impact on water quality. The draft does not explain how this is different than what has been done in the past; an approach that has created the problems we currently face. I recently asked an Iowa farmer his thoughts on a voluntary approach, his response, “You do what you’ve done, you get what you’ve gotten.” More plainly, a long-time Iowa Soil and Water Conservation District commissioner told me, “Voluntary doesn’t work.”

In discussion surrounding this draft document “voluntary” is often cast as an alternative to “regulation”. This is a black-and-white fallacy that seems to have infected the NRS document as well. Between these two philosophies there is a lot of room for the state of Iowa to play a larger role in provisioning clean water for its citizens. Passively relying on voluntary action is no plan at all. The prioritization of watersheds and watershed resources coordination, outlined in the draft, is all for naught if the science of targeting is not followed through to the field level.

No individual’s comments will contain the perfect formula for solving our water quality issues, which is why moving forward this process needs to be open to a diverse array of ideas from the whole spectrum of stakeholders, Iowans. I suggest the next draft include bigger, state-scale ideas along the lines of:
- state support for marketing the products of extended crop rotations and alternative agricultures
- property tax incentives for stewards of water quality
- state-of-the-art remote sensing for the targeting of high pollution source areas
- mandatory minimum width riparian buffers along all waterways
- an anhydrous ammonia tariff to fund wetland restoration and construction
- full funding of all existing water quality programs such as REAP and the Iowa Water and Legacy Fund

Sincerely,
Drake Larsen — Ames, Iowa
I am greatly disturbed by the proposed Iowa Nutrient Reduction Strategy. It is deeply flawed and beholden to industrial agriculture special interests. Our environment and all the people who live in Iowa need you to do much, much better than this. Our waterways are some of the very worst in the nation. This strategy will do nothing to improve them or reverse the dead zone in the Gulf.

Specifically, here are all the reasons I am opposed to this version of the Nutrient Reduction Strategy. These exact words come from an email I recently received, but I agree with ALL of them:

• While the state’s proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture’s contributions to the excessive nutrients in our water.

• History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

• The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers’ costs at all levels.

• Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

• The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

• The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

Please, go back to the drawing board and come up with a strategy that protects Iowa’s water, not protects special industrial agricultural interests that this strategy clearly benefits. This is pathetic.
Secretary of Agriculture Northey,

Farmers want to do the right thing for water quality and have been doing it through conservation practices and soil saving strategies such as buffer strips, terraces, grass waterways, no-till and conservation tillage. As a livestock farmer I am careful to use the manure that my livestock produce to fertilize my crops in a very sustainable way. Farmers will voluntarily to the practices for water quality because of science based facts, good economic sense (not using any more nutrients than the crop needs) and because we are stewards of our farms. Because we live on the land we know what will work and get results rather then someone from Washington D.C. Not every practice will solve every problem on every farm. Farmers need flexibility and yes some funding to cost- share some of the practices but we have made tremendous strides in the last years and will continue to do so. Iowa Nutrient Reduction Strategy is a sound plan. Please support it. Thank-you. Mark Buskohl
It is clear that this plan was designed to fail to address the problem. Polluters cannot be expected to voluntarily take actions to mitigate pollution when the alternative to continue the status quo. Perhaps a better "voluntary" option would be to tax farmers much more heavily, if they don't demonstrate actions and use that tax money to deal with the mess, or at least compensate those whose livelihoods and recreational opportunities are spoiled by nutrient pollution.

I am ashamed that this is the best approach that my state can put together.
Secretary of Agriculture Northey,

I am writing to you in regards to the Nutrient Reduction Strategy. I wanted to express my support of the current outlook on this topic, one of science-based and voluntary practices. Iowa State University has done numerous research and has the knowledge to recommend the best ways to reduce nutrient run-off. In today’s society, we let emotions get in the way of what is truly best for ourselves and the environment. By sticking with science-based ideas and a voluntary program to implement them, I think we can solve problems associated with nutrient runoff.

I bring up voluntary practices because we do not need any more regulations telling farmers and other environmental enthusiasts how to do their jobs or what they should do. Putting more regulations into play will not help the issue but only make people more frustrated. We are farmers of the land for a reason. We love the land. If we don't take care of it, we will not be around down the road. We depend on the land like the land depends on us to take care of it.

I hope that you and your fellow lawmakers support funding of this Nutrient Reduction Strategy, along with other cost-share conservation programs that will help get better conservation practices in use. Alyce Nieland
Secretary of Agriculture Northey,

I very much support the practice of allowing conservation practices protecting our precious water to be regulated by farmers. Afterall, farmers are true stewards of the land!

We voluntarily use wise conservation practices already and do not want further regulations by some group or department that has no idea of the strong tradition and prout heritage of farming.

We support a water plan that lets us, farmers, be part of the solution.  Robert Nath
Secretary of Agriculture Northey,

As farmers, we are good stewards of the land. It is our practice to do what is best for the land, animals and ourselves and we recognize the importance of conservation practices. But this should not be mandated by some authoritative group with no logic or common sense to modern farming techniques.

These programs need to be funded and supported with farmer input. Harley Hassebroek
If voluntary compliance would work it should have been working already; all farmers have been able in the past to comply voluntarily with no impediments.

Since municipal treatment plants will be required to comply, then farmers should also be required to comply.

If farmers comply, THEN they could be eligible for subsidies such as crop insurance.

Thank you for considering my ideas to make our state a place where I can take my grandchildren into our rivers (as we once did with our children).

Sincerely, MaryLea Holcomb
• The state's proposed strategy falls short in many ways:

• It relies entirely on the same voluntary approaches for agriculture that have failed to clean up Iowa's water.

• It puts the bulk of the financial burden on taxpayers, even though profitable farm businesses are responsible for the bulk of the problem.

• It fails to set any common sense standards to restrict a handful of the most polluting farming practices.

• The strategy outlines no timelines, interim goals or means of measuring annual progress toward reducing agricultural pollution.

• It includes no explanation of how the plans will be implemented, how problems will be prioritized or who will make these decisions.
I am very much concerned with the lack of input from social scientists in this strategy. As an agronomist, I find the science assessment for nonpoint source reduction of pollutants to be very thorough and a fine compendium of the vast knowledge and data that addresses water quality issues in agricultural production. However, how these many and diverse strategies are to be implemented in the varying Iowa landscape (varying in topography as well as world views and socioeconomic status) is not apparent in this strategy. This is the very reason I am dismayed at the lack of social science (much of which has been conducted at ISU) that is included in this strategy. The strategy is leaning on "voluntary actions" of landowners and farmers but does not address the likelihood of landowners and farmers to adopt any number of the different methods for improving water quality. While the voluntary action of landowners and farmers is essential to improving water quality, this strategy document does not address how more landowners and farmers can/will be recruited to also adopt any number of voluntary actions. It seems the Iowa Farm Bureau (long a proponent of voluntary action and opponent of any governmental regulation) has had an undue amount of influence on this strategy. Government regulation or incentivizing of conservation methods does not and should not be an "all or nothing" act. Realizing that conservation methods aimed at improving water quality differ across the farming system of Iowa is essential. Once this is realized, regulation and/or incentivizing of conservation methods appropriate for the situation and tailored to specific farming operations could certainly be successful.
I believe in the voluntary strategy for developing plans for nutrient reduction. Overall I think that producers are doing well with current practices and will continue so in the future. With new guidelines and incentives, I believe we can reach reasonable goals for reducing nutrients into the environment.

Sincerely,
Mark Meirick
Secretary of Agriculture Northey,

As a long term no-till farmer, I realize better than most the difference that can be made voluntarily in controlling erosion. As an industry, we need to maintain our ability to be productive, without the intrusion of heavy handed government mandates that aren’t science-based. Leaving field borders intact and no-tilling ground that isn’t highly erodible (but in sensitive areas) can make a significant difference in keeping waters clean. I’m doing these things and have been for twenty years.
Conservation cost share programs are important here in Iowa and have also been effective in helping terrace and waterway sensitive areas. These programs need to be properly funded.
In conclusion, it is my belief that proper funding of existing programs and the implementation of the voluntary practices proposed will meet the nutrient reduction strategy goals. Eric Nelson
While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.
Although the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water. History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers’ costs at all levels. Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy. The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.
History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.
While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water. Please take further action so Iowans can have safe drinking water.
The Iowa Nutrient Reduction Strategy is extremely disappointing. It does not set adequate standards for reduction of agriculture's contributions to the excessive nutrients in our water.

It asks for voluntary approaches for agriculture that have failed over 40 years (since only 30 percent of Iowa farmers participate in voluntary programs) to clean up Iowa's water.

It puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels. Hey, I'm a farmer, and I know this isn't fair.

The most polluting farming practices won't have any standards for restriction.

It sets no timelines, interim goals or means of measuring annual progress toward reducing agricultural pollution.

There are no details on how the plans will be implemented, how problems will be prioritized or who will make these decisions.
Secretary of Agriculture Northey,

I urge you to support and fund the Iowa Nutrient Reduction Strategy and other conservation cost-share programs. Farmers do conservation practices to preserve the land and protect the water and will continue to do so but more regulations is not the answer. Thank You  Janis Holloway
Secretary of Agriculture Northey,

We have a long history of deep care for the land. The Iowa Nutrient Reduction Strategy continues those traditions and makes Iowa a leader in finding solutions to nutrient loading to the waters of our state and improving water quality. We in the farming community recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. We participate in the cost-share conservation programs, we have 10 year along our creeks, tree programs, waterways in our fields, manage our crop spraying, put on the amount of fertilizer needed, just to name a few. We have much more to do on our farms and with the addition of more land without adequate funding from these programs we will not be able to do these projects. I urge you to fund the Iowa Nutrient Reduction Strategy and Iowa's other conservation cost share programs. MaryAnn Donlon
Secretary of Agriculture Northey,

I support the nutrient reduction strategy

I hope you can also support it  Thomas Eischen
Secretary of Agriculture Northey,

Our family would really like show our support for a science-based state nutrient reduction strategy that will recognize the importance of voluntary conservation practices and the need to maintain agricultural production. We encourage all state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy as well as the conservation cost share programs. The failure to fund these adequately in the past has delayed needed conservation projects. Our family farm uses conservation practices on our farm and we will continue to. Jodi Frederick
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January 11, 2013

Mr. Chuck Gipp
Director Iowa Department of Natural Resources
Wallace State Office Building
502 East 9th Street
Des Moines, Iowa 50319

Mr. Bill Northey
Secretary Iowa Department of Agriculture and
Land Stewardship Wallace State Office Building
502 East 9th Street
Des Moines, Iowa 50319

RE: Iowa Nutrient Reduction Strategy □ Ducks Unlimited Comments

Dear Mr. Gipp and Mr. Northey:

Thank you for the opportunity to comment on Iowa Nutrient Reduction Strategy □ A science and technology-based framework to assess and reduce nutrients to Iowa waters and the Gulf of Mexico. Ducks Unlimited is a non-profit wetland conservation organization dedicated to conserving, restoring, and managing wetlands and associated habitats for North America's waterfowl, which also benefits other wildlife and people. Iowa DU has approximately 20,000 members located throughout the state who care deeply about the quality of water, conservation of our resources, and our quality of life. Since 1985, DU has invested more than $17 million and conserved approximately 63,000 acres in Iowa.

DU appreciates the strategic, science and technology-based approach in the development of the Nutrient Reduction Strategy (NRS). Regarding the NRS, we recognize that there are many unknowns and data gaps that remain with this critical issue. We recommend that as the NRS moves forward, science and technology continue to play a key role in the development, expansion and implementation of each of the eight actions. We also encourage more specifics to be included in the action items as the NRS is refined. DU has also limited its comments to agricultural landscapes where we do most of our work, rather than focus on point sources.

We heartily endorse the use of protected, restored and enhanced wetlands as a key Best Management Practice (BMP)/tool for reducing nutrients and sediments. We also encourage the use of wetlands to slow stream/river flows to reduce in-stream erosion. However, we encourage a strong stance to protect all existing wetlands and guard against the destruction of wetlands or other negative impact to wetlands within the NRS. We support the use of mitigated wetlands as a nutrient reduction tool, but only after the application of avoid, minimize and mitigate sequencing, and only within the context of existing federal and state wetland and water laws. Existing wetlands should not be drained and/or impacted to be mitigated elsewhere as part of the NRS.

One excellent source of supplemental information on the positive impacts and contributions of wetlands and other BMPs is the Broughton Creek study, which examines the negative impacts caused by wetland drainage to the watershed and adjacent water bodies. The study provides recommendations on how wetlands can provide tangible and measurable improvements in reducing nutrient and sediment loadings.

In relation to Actions 1 & 2, we support the prioritization of watersheds, as well as the determination of watershed goals. We encourage public participation in both of these action items, as well as a robust process to ensure all stakeholders have input and understand how priorities and goals were developed. It will be critical that science-based accountability and verification be in place to accurately measure progress.

We also stress the importance of setting realistic/achievable goals with phased timelines to ensure meeting explicit numerical objectives and reporting meaningful progress. This will be essential to secure overall plan success.

For Action 4, DU supports voluntary programs to implement conservation programs and BMPs. However, without a high degree of implementation, we are concerned that lack of progress on reducing nutrients and sediments will increase the likelihood of regulatory measures. Therefore we recommend that this action expand strategies and actions to secure a high degree of landowner engagement and implementation, in addition to science-based verification systems.

For Action 6, we stress the importance of developing a science-based, peer reviewed accountability and verification system that accurately and critically evaluates both point and non-point based sources. Much more detail needs to be supplied, including appropriate benchmarks, criteria, measures, etc.

For Action 7, we applaud the NRS adaptive management approach as well as plans for an open and transparent reporting process. We would encourage the WRCC to secure public input in regards to the NRS evaluation and whether it should be reviewed and updated.

We also encourage the development of a public communication/outreach strategy to garner public support for the NRS. This will be critical to ensure long-term funding and resources.

In regards to funding the NRS, we suggest a much more detailed and exact plan/budget to ensure successful delivery and implementation of conservation practices and BMPs. Currently we do not have a five-year Farm Bill authorization and in all likelihoods the new Farm Bill will have reduced funding levels for conservation. Although state budgets are better now than in past years, that may change within the life span of the NRS. We encourage expansion of current state funding programs, including but not limited to REAP, Lake Restoration funding, Watershed Protection Fund, Farm Bill programs, etc. However we also recommend the NRS leaders, partners and stakeholders consider a funding mechanism for Iowa’s Water and Land Legacy so that permanent long term funding can be secured for land and water conservation in the state.

In our 75 year history, Ducks Unlimited has learned that implementing landscape solutions is what yields success for any plan or strategy. Iowa can develop the best priorities, plans, accountability and verification systems, and have excellent communication and outreach - but if we fail to fund and implement on-the-ground and in-the-water conservation and BMPs, then the NRS will fail and our environment and economy will suffer.

We strongly recommend that the NRS and governing bodies utilize an active and robust wetland conservation program to reduce nutrients and sediments. We encourage the partnering with NGOs like Ducks Unlimited to put more and better wetlands/BMPs back on the landscape, utilizing a host of existing programs such the Wetland Reserve Program, Lake Restoration Program, Conservation Reserve Enhancement Program, REAP, as well as new programs developed and funded to specifically address Iowa’s nutrient issues. We welcome the invitation to work with all of the partners and stakeholders in developing this further.

On behalf of Iowa Ducks Unlimited, thank you again for the opportunity to comment. We stand ready, and will continue to work with state, federal and private partners to ensure our wetlands, soil and water resources are conserved for all to enjoy and utilize. Feel free to contact me should you have any questions. Thank you.

Sincerely,
Providing comment on the following sections:

- Executive Summary
- Policy
- Nonpoint Source
- Point Source

Frank Mertz
State Chairman

Cc:  DU  Rebecca Humphries
     DU  Jon Kruse; Mike Shannon; Kurt Dyroff; Gildo Tori
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Thank you
I would like to see mandatory buffer strips along all streams, creeks, rivers, and Lakes in Iowa especially as long as there are CRP payments available like there are now. Buffer strips are simple yet effective. More education needs to be done on availability and practicality of using pumps along streams to water livestock. Then livestock won’t have to go down creek banks to drink from a stream. I have seen pumps in Germany that cattle pump themselves with their nose. I would like to see a ban on lead fishing sinkers in Iowa. This should be simple because steel sinkers are readily available. The DNR has tried to encourage the use of steel but it isn’t happening because lead is still readily available too.
To All the Organizations working on Water Pollution Strategies:

Below is the statement made by the Environmental Working Group...they have all the facts and say it better than I can myself.

HOWEVER, I do want to add the point that having lived in OH - working in Agriculture, lived in IN - growing up on a mixed small family farm, then moving to rural IA... in each state for around 20 yrs apiece...I can say that I have NEVER seen such filthy water as we have here in IA!! Never in all my years in those other states was it too dirty to swim in a pond or lake like it is here. Never did I hear of raw city sewage running into rivers! It is time to enforce the rules in place! It is time to fine those who cause the problems! It is time to shut down the businesses, municipal plants, farms or any other polluters to prevent further damage. It is not the responsibility of taxpayers to clean the water...it is the responsibility of the polluters themselves! It is that SIMPLE... This important not only for Iowa, but for all those down stream from our state!

"While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

- History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

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Please clean up our water!

R Hayne
Secretary of Agriculture Northey,

With voluntary conservation our family has implemented buffer strips around our cattle lots and in areas that potentially would have high erosion.

Our farm isn't the same as every other farm and a cookie cutter approach of one size fits all conservation would be a disaster. Seth McCaulley
Dear Secretary Northey, Director Gipp and Dr. Lawrence:

Environmental Defense Fund (EDF) appreciates the opportunity to provide our recommendations and comments on Iowa’s draft Nutrient Reduction Strategy. Iowa, like all the Upper Mississippi River Basin states, faces significant challenges in delivering the agricultural nutrient reductions needed to achieve the goals laid out by the 2008 Gulf Hypoxia Action Plan. That plan seeks an ambitious but necessary goal of at least a 45% reduction in nitrogen and phosphorus loading to the Gulf of Mexico. In addition, achieving this goal will deliver significant reductions in nutrient loading that will benefit and protect Iowa’s local water quality and drinking water supplies.

EDF applauds Iowa’s leadership in being the first of the twelve Mississippi River states to advance a statewide nutrient reduction strategy, as called for under the Gulf Hypoxia Action Plan, and in taking a science-based, collaborative approach that focuses on all sources of nutrient loading. Iowa has a proud legacy as a leader in pioneering practices to address agricultural nutrient pollution, from wetlands sited and designed to trap and treat tile drainage water to adaptive nutrient management.

However, Iowa is unlikely to meet its nutrient reduction goals unless this conceptual strategy is quickly followed by action on-the-ground. Accordingly, we urge you to lay out a clear framework for implementing the Nutrient Reduction Strategy by:

1. Providing a robust strategy and time frames for developing watershed-scale plans that target the most effective practices to the acres that need them most to increase cost effectiveness and impact, set specific nutrient reduction goals, and establish baselines regarding nutrient loading and practice implementation;
2. Developing a clear process for documenting implementation;
3. Advancing innovations in research, demonstration, education and outreach; and
4. Developing a strategy to provide sufficient funding from all sources to implement the right practices in the right places at the watershed level.

While Iowa’s Nutrient Reduction Strategy addresses both point sources and nonpoint sources, our comments below focus solely on the nonpoint source strategy, addressing each of the five categories of nonpoint source policy recommendations individually below.

I. Setting Priorities: Implementing the Iowa Nutrient Reduction Strategy at the Watershed-Scale

The EPA Recommended Elements of a State Framework for Managing Nitrogen and Phosphorus Pollution instructs states to prioritize 8 digit HUC watersheds on a statewide basis for nitrogen and phosphorus loading reductions in light of the best available scientific information and to prioritize implementation of watershed-scale nutrient reduction strategies in high priority 12-digit HUCs within the larger 8 digit HUCs. The Iowa draft Nutrient Reduction Strategy points to an existing priority watershed identification process that factors in nutrient delivery as well as other issues, including “sediment delivery and flooding” (Sec.1.1 at 15). The draft plan provides that the major 8 digit HUCs will be identified within a year by the Water Resources Coordinating Council (WRCC) in consultation with the Watershed Planning Advisory Council. Given the urgency and magnitude of the environmental challenge of addressing nutrient pollution, the existence of ongoing Iowa watershed planning efforts, and the availability of scientific analysis, such as SPARROW, showing watershed nutrient contribution, we strongly suggest shortening this timeframe for major watershed selection to 2-3 months. The Nutrient Reduction Strategy indicates that after selecting the major target watersheds, the WRCC, in consultation with the Watershed Planning Advisory Council, will then select high priority 12-digit HUC subwatersheds within these major 8 digit HUC watersheds. It is unclear what the timeframe will be for 12-digit HUC selection. We strongly recommend identifying and announcing these high priority subwatersheds as expeditiously as possible and certainly within a year. We also recommend providing the public with a list of the selection criteria for the 8 digit HUCs and the high priority 12-digit HUC watersheds within them and providing an opportunity for public comment on watershed selection.

We strongly suggest providing time frames and expectations as well as setting clear roles and responsibilities for development of watershed-scale plans at the high priority 12-digit HUC level. There should be ample opportunity for public participation and comment in development of these watershed-scale plans. This will not only help ensure a broad range of perspectives and innovative thinking goes into the plans, it will also create a higher level of buy-in at the local level.

It is also critical that these watershed-scale plans make the best use of limited cost-share program dollars by targeting the right practices to the right places based upon the best available science and information. Specifically, in agricultural areas/watersheds, it is critical to focus on three key opportunities to increase nutrient reductions from agriculture: significantly improved impact from 1) investments in nutrient management planning and implementation, 2) investments in wetlands, buffers, and other filters in the agricultural landscape, and 3) innovative strategies to advance expanded technical assistance and leverage cost share program dollars. Our recent study, “Thinking Like a Watershed: Midwest agroecosystems and hypoxia in the Gulf of Mexico” (attached) demonstrates that employing a mix of in field nutrient management practices and wetlands, buffers and other filters in agricultural watersheds throughout the Upper Mississippi River Basin watershed would be a cost effective approach to reducing agriculture-related nutrient pollution to the Gulf of Mexico. Similarly, while not recommendations, the Iowa Nutrient Strategy scenarios demonstrate that implementing infield nutrient management practices and wetlands, buffers and other filtering practices at the watershed scale in high priority watersheds would be a successful and cost effective approach to meeting Iowa’s nutrient reduction goals. It is critical that the strategy for developing watershed-scale plans ensures that this “thinking like a watershed” approach is taken; that watershed scale plans are developed at the local level in high priority HUC digit 12 watersheds that target precious resource dollars to implementing in field practices and filtering practices where they are needed most. For example, Iowa CREP wetlands are highly effective at reducing nitrogen loading from upstream watersheds typically comprising loadings from multiple farms. Not every farm has an appropriate site
for an Iowa CREP wetland; their effectiveness hinges on constructing these wetlands in geographically appropriate locations where landowners are willing.

For agricultural watersheds or areas, the Nutrient Reduction Strategy further prioritizes: 1) focusing conservation programs; 2) combining in-field and off-field practices; 3) implementing small watershed pilot projects at the 12-digit HUC scale; and 4) exploring opportunities for nutrient trading and other innovative approaches. First, we agree that it is important to focus conservation program outreach and implementation. In addition, we believe it is important to analyze where the existing barriers are to enrollment and to prioritize addressing them. Second, we strongly support focusing on in-field and off-field practices. As the two-year analysis shows, a high level of implementation of both in-field management and off-field filtration practices, such as treatment wetlands, is needed to meet nutrient reduction goals. Third, the Nutrient Reduction Strategy indicates that local stakeholders will, in conjunction with other partners, such as USDA, develop small watershed pilot projects (Sec. 1.1 at 18). We strongly encourage providing further information. For example, will a request for proposals (RFP) be issued to and technical assistance funding provided to prompt and support local development of these watershed projects/plans? It is also unclear what the expectations are for these "pilot projects." We urge you to set a goal of developing watershed-scale plans/projects to address agricultural nonpoint pollution in all of the high-priority 12 digit HUC sub-watersheds in which this is a significant source of nutrient contribution. The term "pilot" should not be interpreted to mean that it is sufficient to pursue this approach in a few 12-digit HUC watersheds. We also urge you to provide local stakeholders with a framework for developing science-based suites of practices to address agricultural nonpoint pollution at the 12-digit HUC watershed scale, giving them a ready way to work with farmers to use the scientific information provided by the Plan and to get the right practices in the right places.

Finally, we strongly support Iowa’s interest in exploring innovative approaches that can leverage conservation program investment. This is an exciting area and could provide a meaningful way to scale up implementation of some of the off-field practices, like treatment wetlands. As the Plan notes, these practices can entail relatively large upfront costs, but have low annual costs and long practice lives, resulting in low price per pound of nutrient removal. We strongly encourage Iowa not only to explore nutrient trading, but also to foster options for the agricultural community to help defray the initial up-front costs of treatment wetlands and other filtering practices through tax-deductible contributions to an entity designed to support IA CREP or other treatment wetland implementation. For example, upstream farmers who would benefit from installation of a CREP wetland by their downstream neighbor should have an easy way to financially contribute to this conservation work and to receive recognition for their stewardship. Such recognition could take a variety of forms, including helping farmers meet emerging supply chain criteria for soybeans and corn sourced in an environmentally sustainable way. State agencies should also favorably regard participation by upstream farmers in defraying the costs of wetland or other treatment installation when setting land allocations or other water quality expectations.

II. Documenting Progress

Creating and implementing a strong framework for tracking, evaluating, and, in light of lessons learned, revising watershed scale approaches over time is essential to ensuring the success of Iowa’s efforts to meet nutrient reduction goals. With regard to agricultural areas/watersheds, we urge Iowa to:

• Further develop baseline understanding of nutrient inputs and practice implementation. We urge you to work with the agricultural community, agency experts, and conservation organizations to develop a framework to balance public need to know with agricultural business confidentiality concerns;
• Identify existing and further develop new cost-effective metrics for real-time evaluation of practice effectiveness. For example, metrics for how practices involved in nutrient management are changing management of nutrients;
• Identify and develop metrics that are spatially relevant. For example, metrics for filtering practices should provide insight into how much flow from the upstream contributing watershed is being treated. An Iowa CREP wetland, for instance, typically treats agricultural drainage from several farms; and
• Dedicate a funding stream and staffing resources for verification of practice implementation, including compliance and fulfillment of practices included in cost share contracts to ensure those dollars are being used for real impact.

Improving the ability to document nutrient reductions and improvements in management and conservation practice implementation is essential. The public sector support for continued funding depends upon being able to document results, and agricultural community support and implementation is also dependent upon being able to make a clear, convincing case that these investments are producing results.

III. Research and Technology

With respect to agricultural areas/watersheds, the Nutrient Reduction Strategy emphasizes the importance of developing "new technologies and creative solutions for nutrient reductions are needed to deliver and optimize implementation at full landscape scale" (Sec. 1.1 at 18). As we discuss more fully below under Funding, we recognize and agree that creative solutions are needed in order to get the suite of existing conservation tools implemented at a landscape scale. This is particularly true for filtering strategies, such as treatment wetlands, that provide dramatic nutrient reductions and are highly cost effective, but require a substantial initial upfront investment in construction costs and land retirement. While there is farmer interest in filtering tile drainage water (the Iowa CREP has a long wait list), rising costs – particularly rapidly escalating land costs – have constrained enrollment capacity. Currently, the Iowa CREP can only afford to enroll 2-3 wetlands a year. Fresh approaches are needed to leverage state and federal public investment. Such creative solutions could include participation by farmers who are upstream or otherwise within the contributing watershed to a planned wetland voluntarily contributing to help fund these practices through either tax deductible contributions to suitable 501(c)(3) charitable organizations or possibly as deductible business expenses provided to 501(c)(5) organizations.

We agree that research into new technologies can also be very helpful in reducing nutrient contribution from agricultural nonpoint sources. Further research offers the opportunity to more fully understand the strengths and challenges of potential new practices. For example, further research into directing tile into saturated buffers can provide valuable insights into appropriate siting criteria and can avoid unintended adverse consequences, such as practice failure. We agree that it is vitally important to dedicate sufficient funding to unbiased, peer-reviewed research of these potential new technologies. While we welcome and support such research efforts, we note that the existing mix of field practices, including adaptive nutrient management, conservation tillage, and cover crops, and filtering practices, including wetlands designed and sited to treat tile drainage water, can, as demonstrated by the Nutrient Reduction Strategy scenarios, meet the nutrient reduction goals if they are implemented at the landscape scale.

Strengthen Outreach, Education and Collaboration
We agree that implementation of the Nutrient Reduction Strategy will require stronger outreach, education and collaboration, including “identifying new and enhanced ways for the private sector to provide leadership, new technologies and services to reduce nutrient transport” (Sec. 1.1 at 18). It is critical that private sector leadership and agricultural community stewardship extend to addressing the financial issues involved in implementing in field practices and filtering strategies at the watershed scale. Outreach and education are of limited utility if there is not adequate opportunity to participate in cost share programs due to limited financial resources; this is, of course, a critical barrier to implementation with regard to filtering practices that while highly effective, often involve significant upfront costs in construction and land.

We strongly agree that certified crop advisors (CCAs) can be an important partner. The new educational program offered through the American Society of Agronomy on the 4 Rs and adaptive management is a key opportunity to increase the level of technical knowledge on this critical practice and a crucial opportunity to enlist CCA support in providing outreach to their clients. We recommend that Iowa make a priority of helping to promote such educational opportunities, such as by creating a rewards/acknowledgement program for CCAs who take priority courses in the 4 Rs and adaptive nutrient management and who use what they learn to help farmers improve management. Iowa should reach out directly to state and local CCA associations and to agricultural retail entities to engage their support, involve them in advancing solutions and to provide transparency.

Funding

Environmental Defense Fund believes that it is critical to advance water quality while maintaining the economic viability of agriculture. The Iowa Nutrient Reduction Strategy provides an important opportunity for agriculture to assume a greater leadership role in addressing nutrient runoff incidental to agricultural production. Given the magnitude of the nutrient reductions Iowa needs to make, the difficult economic times for the public sector at all levels, and today’s high commodity prices and rapidly rising agricultural land values, it is critical that 1) maximum benefit be provided by each dollar invested in the nutrient reduction strategy; and 2) the private sector, particularly agriculture, contribute to leverage and further public sector investment. The draft Nutrient Reduction Strategy already provides for near term recommendations to the legislative and executive branches of state government regarding use of existing funding sources and, where applicable, reallocation of existing funding sources to fund implementation of the strategy (Sec. 1.1 at 19), but it is critical to grow the overall funding for implementation.

Sufficiently funding implementation of the Nutrient Reduction Strategy is the crux of the challenge of successfully reducing nutrient pollution. The draft Nutrient Reduction Strategy provides practice cost effectiveness data and scenarios that show that the nutrient reduction goal is achievable provided there is sufficient support and funding. While the scenarios were not intended as recommendations, they do provide helpful rough benchmarks as to likely total cost – $1.2 to $4 billion. This is an ambitious but achievable goal if a sufficiently ambitious and practical mix of strategies is employed to grow the total resources available to implement the Nutrient Reduction Strategy.

As discussed above, some of the most effective and cost effective practices in reducing nutrient delivery are filtering practices, particularly treatment wetlands, but often these practices entail significant upfront costs. Iowa and USDA Farm Service Agency have made a monumental contribution to the challenge of addressing row crop agriculture-related nutrient pollution in the UMRB through the Iowa CREP which seeks to construct wetlands situated to trap and treat row crop agricultural drainage water, cutting nitrogen/nitrate loads by roughly 50-90%. Iowa State University modeling predicts that if sufficiently implemented throughout the UMRB, these constructed treatment wetlands could cut nitrogen loading to the Mississippi River and Gulf of Mexico by 30% (Crumpton, W.G., G.A. Stenback, B.A. Miller, and M.J. Helmers. 2006. Potential Benefits of Wetland Filters for Tile Drainage Systems: Impact on Nitrate Loads to Mississippi River Subbasins). The scenarios in the draft Nutrient Reduction Strategy call for construction of approximately 4,000-12,000 IA CREP wetlands. These wetlands are also cost effective – cost per pound. However, given the significant initial construction costs (roughly $3,000 per acre) and rapidly rising land Iowa cropland values, the pace of IA CREP enrollment has dropped to 2-3 wetlands per year. Since the Iowa CREP was launched in 2001, 66 IA CREP wetlands have been constructed. At the current pace, it would take over a thousand years to construct a sufficient number of these wetlands at landscape scale in Iowa. Given the proven track record for this filtering practice in dramatically cutting nutrient loads when sited properly, it is critical that sufficient funding be allocated by state, federal and private partners to ramp up the pace of implementation. We strongly suggest:

• Significantly increasing the state appropriation for IA CREP funding (we note that while the Nutrient Reduction Strategy accurately notes that Iowa CREP budget held steady in FY 12 and FY 13 at $1,000,000 per year, this is a significant drop from $1,500,000 funding level in FY11);
• Increasing the USDA incentives to better leverage state investment and to allow state funding to extend to many more wetlands per year; and
• Providing innovative opportunities for private investment and donations to CREP funding, such as encouraging the agricultural community to make tax-deductible charitable contributions defraying the cost of wetland construction and land costs.

While an important practice, the treatment wetlands are an example of the larger funding challenge. Like CREP, many NRCS cost share programs are oversubscribed. Additional funding is needed, for example, to meet the need for in field practices, like adaptive management and cover crops.

Finally, as discussed above, in light of the magnitude of this financial challenge, it is critical to try innovative new approaches to leverage public sector resources. We strongly encourage Iowa not only to explore nutrient trading, but also to create opportunities for:

• Tax-deductible business expenses for payments to 501(c)(5) agricultural or horticultural organizations for farmer or agricultural landowner funding that goes to pay for soil samples, etc;
• Tax-deductible contributions to 501(c)(3) organizations for constructed agricultural drainage water treatment wetlands or other wetlands, buffers or filtering practices that reduce nutrient loading;
• Supply chain or other private sector initiatives that recognize farmers and agricultural landowners not only for implementation of conservation on their lands but also for funding conservation. For example, a farmer may not have a suitable site for a treatment wetland on his or her land, but may he or she should be recognized if they chose to help fund construction of a neighbor’s treatment wetland. Supply chain or other similar initiatives could, perhaps, be tied to the proposed farmer recognition program (Sec 1.1 at 19);
• Working with drainage districts to incorporate treatment technologies and beneficial design criteria into new, upgraded or replacement of aging drainage infrastructure;
• Direct nutrient trades as well as potentially other credit markets or initiatives for such co-benefits as flood storage, wildlife habitat and carbon storage.

We greatly appreciate this opportunity to provide our comments on Iowa’s draft Nutrient Reduction Strategy. We would welcome an opportunity to discuss these recommendations and provide assistance to the state in achieving its water quality goals.
Suzy Friedman, Director, Agricultural Sustainability
Environmental Defense Fund
1875 Connecticut Ave, NW, #600
Washington, DC 20009
sfriedman@edf.org, 202-492-1023

cc:
Ann Mills, USDA Deputy Under Secretary for Natural Resources
Jason Weller, NRCS Chief
Tom Christensen, NRCS Regional Conservationist for the Central Region
Nancy Stoner, Assistant Administrator for Water, US EPA
Susan Hedman, Regional Administrator for Region 5, US EPA
1. While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

2. History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

3. The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

4. Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

5. The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

6. The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

I love kayaking and have a group of friends who like to kayak on Iowa's rivers. However, the rivers are really dirty. Some of my friends will not go on Iowa's rivers any more because of the chemical runoff.

Please do something that will actually clean up the rivers once and for all to make them safe for kayakers like myself and others.

Thanks.

Lohrainne Janell
I'm the fifth generation owner of farm land in the Walnut Creek drainage north of Fairfield, in Jefferson County.

If I understand the proposed nutrient reduction strategy at all, it relies on the same voluntary participation assumptions that have failed for years to stop the pollution of Iowa's wells and streams. I believe it was Einstein who said that trying the same procedure over and over and expecting a different outcome, is a symptom of mental distress.

Your proposals put the cost of cleanup on the backs of Iowa taxpayers. It's the huge, profitable factory-style farms, particularly CAFO's, that are causing the problem. They should bear the cost of remediating the damage. In almost any other enterprise in the U.S., the polluter is assessed the cost of cleaning up.

The proposals appear to include no deadlines for implementation and no proposals for what to do until the (unstated) deadlines are met. In other words, the strategy appears to be not at all serious.

Please try again. It is so distressing to see our surface and well waters become the most polluted of any state.
Agriculture is a major contributor to our state's water pollution. Please focus on agriculture's role and responsibilities in your mandates.

• Voluntary measures are ineffective. There needs to be a clear protocol for protecting our precious waterways.

• The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

• The State plan needs to set minimum standards of care that farmers should follow with clear and strict timelines that are protective to the environment not the farmer.

The State plan needs to clearly define how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.
Secretary of Agriculture Northey,

I hope we can count on you to support a science based approach to nutrient management. I would like to see a small amount of our budget surplus go into funding of the nutrient reduction strategy. If we give consistent longterm attention to this issue we will be successful. Bruce Nieman
Secretary of Agriculture Northey,

I am a fourth generation Grundy County farmer who takes the responsibility of caring for my farmland (and all land for that matter) very seriously. I strongly support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I currently have several miles of grassed waterways and filter strips on my own ground and that of landlords as well. These were all installed and maintained on a voluntary basis with government cost-share assistance. These programs have worked well.

Please fund the Iowa Nutrient Reductions Strategy as well as the other state cost-share conservation programs. Kenneth Hogle
Secretary of Agriculture Northey,

I would like to express my support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I would like to urge lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state’s other conservation cost-share programs. Iowa’s failure to adequately fund these programs in the past has delayed needed conservation projects.

I have already enrolled acres in the buffer strip program several years ago. I have been adding grass waterways and several terraces on my own as well as refurbishing old ponds.

Thank you for your time and consideration. Nathan Sarver
Providing comment on the following sections:

- Executive Summary
- Policy
- Nonpoint Source
- Point Source

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.
Providing comment on the following sections:

- Executive Summary
- Nonpoint Source
- Policy
- Point Source

- Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.
Secretary of Agriculture Northey,

This afternoon I would like to express my support and urge your support for funding the Iowa Nutrient Reduction Strategy.

A grass roots, local approach to managing nutrient movement and/or loss is necessary for an effective and efficient long term solution. Iowa's agriculturists have long been leaders in conservation, on a voluntary basis. Implementation of irrelevent regulations from a distance is inefficient and most likely ineffective.

As a third generation family farmer, few things are more important than the land with which we are blessed to make a living. Our family operation has many conservation practices in place, for instance: adequate waterways, burrer strips, no-till crop rotations or minimal tillage for maximum residue coverage. Many of these are voluntary, to protect our investment.

In short, voluntary conservation measures are prominent in Iowa agriculture. Study for any form of regulation is best served by those that are familiar with the "Iowa-scape", not far removed parties.

Again, I ask your support of funding for the Nutrient Reduction Strategy. Patti Edge
Dear comment reviewers,

I believe that it is very important to reduce farm runoff into Iowa's waters and otherwise reduce the agricultural pollution load in Iowa. At this point, simply living in the midwest is considered a risk factor for cancer, because of agricultural pollution in the environment. This has personal meaning for me, because my 23-year-old daughter is being treated for cancer at the University of Iowa Hospitals and Clinics. Twice a week, I see the long rows of chemo delivery chairs lined up along the halls at our flagship hospital. Many of the many cancer patients appear to be Iowa farmers. I'm sure most of them are Iowans. In my youth, cancer was a very rare disease. We in Iowa need to reduce agricultural pollution for the sake of the health of our citizens and for the sake of environmental balance.

- While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

- History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

- The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels. Most of Iowa is now farmed by large corporations. I AM TIRED OF BIG CORPORATIONS MAKING THEIR MONEY OFF THE BACKS OF THE ENVIRONMENT, WITH PEOPLE’S HEALTH AS THE COLLATERAL DAMAGE. EXPENSES FOR ENVIRONMENTAL AND HEALTH COLLATERAL DAMAGE PASSED ON TO INDIVIDUALS AND THE GOVERNMENT—privatizing the profits and socializing the costs. IT IS ESPECIALLY GALLING WHEN CORPORATIONS FIGHT PAYING APPROPRIATE TAXES that could at least begin to compensate for the tragic collateral damage.

- Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow. WE NEED CLEAR, SPECIFIC STANDARDS THAT ARE ENFORCED, even if it costs the corporations a little more money.

- The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

- The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

I deeply support farmers growing healthy food for people. I do NOT support subsidizing the greed of corporate "persons" on the backs of the government and the health of actual human "persons" because of weak regulation.

PLEASE, let's not leave it to the foxes to guard the hen houses!!

Thank you very much for your consideration.

Sincerely,
Susanna McCan MacGregor
641-469-3735
The state’s proposed strategy falls short:

- It relies entirely on the same voluntary approaches for agriculture that have failed to clean up Iowa’s water and thereby polluting the lives of everyone.
- It puts most of the financial burden on taxpayers, even though profitable farm businesses are causing most of the problems.
- It fails to set any common sense standards to restrict a handful of the most polluting farming practices.
- The strategy outlines no timelines, interim goals or means of measuring annual progress toward reducing agricultural pollution.
- It includes no explanation of how the plans will be implemented, how problems will be prioritized or who will make these decisions.
History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.
The state's proposed strategy falls short:

- It relies entirely on the same voluntary approaches for agriculture that have failed to clean up Iowa's water and thereby polluting the lives of everyone.

- It puts most of the financial burden on taxpayers, even though profitable farm businesses are causing most of the problems.

- It fails to set any common sense standards to restrict a handful of the most polluting farming practices.

- The strategy outlines no timelines, interim goals or means of measuring annual progress toward reducing agricultural pollution.

- It includes no explanation of how the plans will be implemented, how problems will be prioritized or who will make these decisions.
I believe this plan is a good start. At least it is getting the attention of the Ag. community. Finally they admit to 85-90% of the problem in our watersheds.

However, I do have a problem with the term voluntary used in the non point source plan. The Ag. community is responsible for the majority of the nutrients we want to remove and other than plan reviews and reporting there is no way to force farmers to comply.

Without some type of enforcement or control, the plan is set to fail or our watersheds will remain as they are, or get worse with the high price of corn & beans.

90% of the hypoxia problem in the Gulf is due to non point sources and 10% is due to point sources. Wastewater plants in Iowa probably account for less than 1/2 of 1% of the nutrient problem in the Gulf. Forcing aprox. 170 wastewater plants in Iowa to spend over one billion dollars to clean up such a small amount of the problem is a hardship imposed on communities, while the majority of the pollution is from non point sources and will be voluntary. There must be a strategy to control and monitor the Ag. people in all the watersheds in Iowa and not just wastewater and industrial point sources.

The term "Voluntary" should be removed from the non point source plan.

Paul Horsfall
575 Sapphire Cr.
Dubuque Ia. 52001
While the state’s proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture’s contributions to the excessive nutrients in our water.

• History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

• The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers’ costs at all levels.

• Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

• The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

• The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.
Secretary of Agriculture Northey,

Let us keep our practices voluntary for conservation so that we can use the practice that is best suited for each particular farm. If the government is serious about trying to reduce nutrient runoff then lets fund the program fully, so that we do the work properly that needs to be done.

On my operation we have put in 3 miles of grass waterways, over a mile of buffer strips, planted alfalfa on sandy spots to soak up nutrients.

We make sure all manure is knifed in when applied and only when the temperature is cool enough to prevent volatilization. We leave as much residue on top of the soil as is practical for our operation. Tim Peelen
Iowa Nutrient Reduction Strategy
Online comment submissions

Name John Pearson
City
State

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

Secretary of Agriculture Northey,

I feel it is vital the Iowa Legislature fully fund the Iowa Nutrient Reduction Strategy. This voluntary plan is the first in the nation to be developed through cooperation between state government and higher education. The Iowa Department of Agriculture and Land Stewardship and the Iowa Department of Natural Resources developed the plan. Iowa State University helped by contributing a science assessment to the plan. It is my belief this voluntary plan will succeed in cleaning our surface waters and reduce nutrients flowing to the Gulf of Mexico. It is important that Iowans control this issue. We do not need the federal government handing down a one size fits all solution, which may be totally wrong for Iowa. Conservation is vital and necessary in this day and age. Iowa has the chance to lead the nation in this area. Please vote yes on this issue. John Pearson
The state's proposed strategy falls short:

- It relies entirely on the same voluntary approaches for agriculture that have failed to clean up Iowa's water and thereby polluting the lives of everyone.

- It puts most of the financial burden on taxpayers, even though profitable farm businesses are causing most of the problems.

- It fails to set any common sense standards to restrict a handful of the most polluting farming practices.

- The strategy outlines no timelines, interim goals or means of measuring annual progress toward reducing agricultural pollution.

- It includes no explanation of how the plans will be implemented, how problems will be prioritized or who will make these decisions.
The state's proposed strategy falls short:

- It relies entirely on the same voluntary approaches for agriculture that have failed to clean up Iowa's water and thereby polluting the lives of everyone.

- It puts most of the financial burden on taxpayers, even though profitable farm businesses are causing most of the problems.

- It fails to set any common sense standards to restrict a handful of the most polluting farming practices.

- The strategy outlines no timelines, interim goals or means of measuring annual progress toward reducing agricultural pollution.

- It includes no explanation of how the plans will be implemented, how problems will be prioritized or who will make these decisions.
While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

- History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

- The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

- Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

- The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

- The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.
Secretary of Agriculture Northey,

As we embark on a new year and we look to the future of agriculture production and water quality I urge state lawmakers and other involved state leaders to adequately fund the Iowa Nutrient Reduction Strategy and other conservation cost-share programs to benefit our valuable farmers and our increasing level of agricultural production in Iowa. We need to protect our water and other natural resources and at the same time increase our level of production in order to keep up with the growing demand on Iowa farmers for food, fiber, and fuels that are a product of our great agricultural production system.

I think it is important for us to maintain voluntary conservation practices for our farmers in conjunction with science-based nutrient reduction strategies that will protect our natural resources and allow our farmers to continue producing at our prolific levels. Thank you for considering my input on this topic. Steve Sonntag
Secretary of Agriculture Northey,

I am writing to encourage you to support the voluntary conservation practices. I have been farming for over 20 years and the conservation practices that I use are very beneficial to the land, environment and my operations. Farmers know what needs to be done and when. When we involve the government to implement these plans it takes to long and the cost way to much.

Thanks for considering these practices. Rodney Collins
Secretary of Agriculture Northey,

For many years our family farm has practiced no-till conservation and has seen many benefits. In most recent years we have been able to decrease the amount of nitrogen units applied and still able to increase our yields. We were able to do this by utilizing science based research provided to us by our fertilizer company.

By supporting this effort now, more farmers can learn and implement practices like these to continue to keep watersheds clean before the EPA steps in and requires it be done at a much higher costs and without our say in what effective and efficient practices should be.   Amy Glick
It is time to step up and stop the further polluting of Iowas waters by the large farms whose practices literally are poisoning our waters, and hold them accountable, placing the responsibility of clean-up where it belongs, on those who are doing the polluting!
Dear IDALS, IDNR, and ISU,

I believe the current policy and strategy are flawed and propose that you amend the policy and strategy to implement the points below. Those responsible must take responsibility and demonstrate leadership, intelligence, and fairness in regards to our water supply.

• While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

• History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

• The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

• Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

• The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

• The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.

Sincerely,

Suzanne Clifton
Secretary of Agriculture Northey,

A lot of time and money has been spent developing the Iowa Nutrient Reduction Strategy. While it is not perfect and will likely need some changes, it is a good starting point in addressing efforts to reduce P and N losses from urban and agriculture locations. Most of the recommended practices cost a lot of money and the State of Iowa should help with cost-share funds, since these practices would benefit all Iowans, not just farmers. We need funds not only for cost-share but to fund research on the best and most cost-effective ways to reduce soil erosion and nutrient runoff. On our farm, we have put in a lot of terraces, grass waterways, buffer strips and contour farming as well as no-till and cover crops-some with cost-share and some on our own. I hope you support the efforts to implement the nutrient reduction plan Thank you. John Sander
Iowa Nutrient Reduction Strategy
Online comment submissions

Name Polly Miller
City
State

Providing comment on the following sections:
- Executive Summary
- Policy

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Timestamp 1/16/2013 6:48 PM

Secretary of Agriculture Northey,

I strongly urge lawmakers to adopt the science-based nutrient reduction strategy. Iowa farmers are responsible businessmen & women who do not want to damage the ground from which they make their living - nor do they want to see legislation that will choke the common sense approach our lawmakers have used in the past. We do not want to go down the same road as some other states have gone down, by implementing restrictive regulations.

We will also need to adequately fund this program & other cost-share programs to encourage implementation & continuation. Nothing encourages a person to adopt something new, than a monetary cost-share program. Even in these lean times, this will be to the benefit of one our state agricultural industry.

Thank you. Polly Miller
Secretary of Agriculture Northey,

As an Iowa Livestock farmer I feel it is very important to have a "science-based" nutrient reduction plan. One that recognizes voluntary conservation practices to help keep agriculture production in this state. Iowa's economy is dependent on the ag sector, we must continue to help support it.

Conservation is a very important part of every Iowa farm. The state needs to continue to help farmers by cost sharing on conservation projects. Without this help for the state some major conservation projects will not be completed.

Our farm has done many voluntary conservation projects over the years including tiling, terracing, and containing cattle lot run off. We will continue to practice good conservation by implementing Maure Management Plans and reducing the amount of fertilizer to grow a bushel of corn. Benjamin Butcher
Secretary of Agriculture Northey,

I am young farmer that believes in conservation. I have done a lot of fertilizer research on my farm through the ON FARM NETWORK. I urge you to fund the nutrient reduction strategy, as well as other cost share programs. I believe that science based system is the best. Mike Coleman
Secretary of Agriculture Northey,

I believe a science-based nutrient reduction strategy should be implemented for the state of Iowa. Voluntary conservation practices are key to this strategies success. Iowa farmers know what is the best conservation practice for each of their farms. For example, terraces might work best on steep or rolling ground whereas buffer strips work well along creeks and rivers. Agriculture production must be maintained to keep the the local Iowa economy on it's feet!

State lawmakers should consider funding this strategy along with other conservation cost-share programs. Failure to fund these programs has delayed needed conservation projects in the past.

On our farm we utilize grass waterways, buffer strips, and predominantly terraces to control erosion and improve water quality. Iowa farmers are excellent stewards of the land and should be allowed the freedom to implement custom conservation plans that fit each of their farm's needs best. Rob Young
Secretary of Agriculture Northey,

I would like to ask for your support with the science based nutrient reduction strategy. I would also urge lawmakers to adequately fund this strategy as well as other conservation cost share programs.

Thank-you for your help in this very important plan. Brian Krause
• The state's proposed strategy falls short in many ways:

  • It relies entirely on the same voluntary approaches for agriculture that have failed to clean up Iowa's water.

  • It puts the bulk of the financial burden on taxpayers, even though profitable farm businesses are responsible for the bulk of the problem.

  • It fails to set any common sense standards to restrict a handful of the most polluting farming practices.

  • The strategy outlines no timelines, interim goals or means of measuring annual progress toward reducing agricultural pollution.

  • It includes no explanation of how the plans will be implemented, how problems will be prioritized or who will make these decisions.
Secretary of Agriculture Northey,

I fully support a science-based state nutrient reduction strategy. This should be a plan specific to Iowa and not imposed upon us by those not familiar with Iowa. It also should be composed of voluntary conservation practices and the strategy needs to maintain agricultural production.

We must adequately fund the Iowa Nutrient Reduction Strategy as well as other state conservation cost-share programs. In the past when these programs have not been fully funded, needed conservation projects have been delayed. Dean Ekstrand
• The state's proposed strategy falls short in many ways:

• It relies entirely on the same voluntary approaches for agriculture that have failed to clean up Iowa's water.

• It puts the bulk of the financial burden on taxpayers, even though profitable farm businesses are responsible for the bulk of the problem.

• It fails to set any common sense standards to restrict a handful of the most polluting farming practices.

• The strategy outlines no timelines, interim goals or means of measuring annual progress toward reducing agricultural pollution.

• It includes no explanation of how the plans will be implemented, how problems will be prioritized or who will make these decisions.
I believe that the states strategy falls short in many ways:

- It relies on the same voluntary approaches to agriculture that failed to work in the past and puts the burden on the taxpayers. It also fails to set any COMMON SENSE standards to restrict a handful of the most polluting farming practices. There are no timelines, or means of measuring interim progress toward reducing agricultural pollution. And lastly, it includes no explanation of how problems will be prioritized or who will make these decisions.

I am very concerned about this affecting our water and even the health of the Gulf of Mexico.
While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

- History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

- The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

- Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

- The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

- The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.
Secretary of Agriculture Northey,

My husband and myself find this strategy to be a very worth-while idea to fund. Voluntary conservation practices are a great way to help our environment and more are willing to comply when it is on a volunteer basis. Being forced or regulated to do so has never been found to be successful. My husband owns his own tiling and dozers so he can help others in their conservation plans. I feel it will be very beneficial to all to fund this Nutrient Reduction Strategy. Alicia Johnson
Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices along with the need to maintain agricultural production.

I appreciate the efforts of state lawmakers to adequately fund conservation cost-share programs for farmers and ranchers. Without these programs, some conservation projects would be financially unreachable.

As a landowner along the banks of the beautiful Wapsipinicon River, I take water conservation very seriously. With good management I plan on passing it to the next generation more improved than when it was purchased. Matt Svoboda
Iowa Nutrient Reduction Strategy
Online comment submissions

Name  Sherry Levesque
City  Fairfield
State  Iowa

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

• Clearly, the old “solutions” have not worked and the new guidelines which mirror the old cannot be effective.

While the state’s proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture’s contributions to the excessive nutrients in our water.

• History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

• The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

Please - let's go for some practical, real solutions.

Sincerely,
Sherry Levesque
Secretary of Agriculture Northey,

I encourage you to fund the Iowa Nutrient Reduction Strategy, also fund voluntary conservation practices. If the state budget is too tight take the funds from the DRN or Reap funds, they waste the money! Vincent Spain
History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.
Iowa Nutrient Reduction Strategy
Online comment submissions

Name Joe Kafer
City
State

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

Secretary of Agriculture Northey,

On our farming operation we practice no-till and minimum-till. Our soil types are a sandy loam so in late May we side dress nitrogen on the corn plants because that is when the plants need it most. It's more beneficial then because the nitrogen has less of a chance of leaching into our water system. To prevent chemical run off we use buffer strips and water ways. We work with the soil conservation to keep up a good plan on our farms. I have also observed my neighbors practicing good voluntary conservation practices. Joe Kafer
Providing comment on the following sections:

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

Secretary of Agriculture Northey,

We need a science based state nutrient reduction strategy. I feel that this should be a voluntary conservation program. It is also important to maintain a high yield environment so that we can feed a hungry world. The state needs to adequately fund the Iowa Nutrient Reduction Strategy as well as the state's other conservation cost-share programs. My brother and I use N serve to stabilize anhydrous. We also maintain 7 terraces that our father constructed in the 1960s. We continue to look for other ways to prevent nutrient runoff. Kyle Brinkman
I am a farmer in Taylor County, southern tier, third county east of the Missouri River.

My wife and I started farming with my parents when I returned from the Army in Feb 1969.

I know a lot of good and experienced people put a lot of work into this strategy. The strategy should be simpler than it sounded when I when I watched the presentation on the internet. We started to plant some crops no-till in 1985 and went continuous no-till in the late 90's. We also raised some hay or seeded some down for grazing or hay about every year. We have installed several feet of terraces over the years. We worked with cover crops using rye in front of soybeans for almost 20 years. Starting in 2009 we have acheived 90 coverage with cover crops after the cash row crop is harvested both corn and soybeans. In this area gulley erosion is the main constraint to continuous cropping.

It takes cover crops, crop rotation longer than flip/flop corn/soybeans and terraces to do the complete job. We have found cover crops to be especially profitable. They have reduced our time filling gullies and cleaning out terraces, reduced the amount of fertilizer needed, provided grazing for cattle. We have also found we can get in the field one or two days sooner in a wet year and in a dry year the cover saves moisture and keeps the soil temperature cooler. No-till planting is a no-brainer. It reduces time and fuel planting.

In this county I doubt that 30% of the acres are no-till planted, yet it is a proven practice. Tillage is a mindset. That needs to change. I feel that some of our beloved farm organizations have lead us astray in this state. I am ashamed of the attitude that some of them have taken," prove that farmers are polluting and how much and then pay us to correct that." That's wrong-headed. I say "No-till plant and use cover crops and rotations and pay yourself." The problem is between our ears.

Our experience here would support Matt Liebman's research project results at ISU and Dick and Sharon Thompson's "On Farm Research" at Boone. We have three challenges as farmers: 1. Produce enough forever(environmentally benign at worst)Do No Harm.

2. Produce in a socially acceptable manner. 3. Profitable, it must be on its own to be sustainable.

Paul Ackley

712-621-1040
Please strengthen our clean water controls, & require profitable farming corporations to clean up their acts, rather than requiring the citizens to pay for their pollution.

The strategy plan fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.
Secretary of Agriculture Northey,

Please support and adequately fund the Iowa Nutrient Reduction Strategy. I vastly prefer a science-based voluntary program that allows Iowans to work on serious environmental problems while recognizing we need to support producers in our state. I am talking about supporting the producers of food, fiber, economic growth, and jobs. We already have enough efforts by the federal government and anti-animal agriculture groups to crush farmers and businesses with ever-expanding regulations. We don't need more. David Bredensteiner
The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.
Secretary of Agriculture Northey,

It is very important to base any nutrient management strategies on science and not the desires of environmental groups and public pressure. Most Iowa farmers have demonstrated that they are willing to work on reducing their environmental impact in regards to nutrient runoff.

Terraces, waterways, buffer strips, CRP, and no-till farming are all ways that runoff is reduced from current farming operations and those items are important tools to reduce nutrients into our waters. Our farm has adopted some of those, notably the terraces and waterways, but not every piece of ground we own needs every one of those items. Each farm has a different need in regards to protecting the environment and only the farmer who operates the land truly knows the best way to protect it. That is why one nutrient strategy for all farms is a unrealistic goal.

The funding of conservation cost-share programs is also critical to reducing nutrient run off as it encourages farmers to do the right thing with protecting the land and by funding them, the wait time is reduced.

I hope that you will think about these items when legislation is introduced for nutrient strategies and other farm related bills. Most farmers care about their land and do not need further regulations.

Thank you. Vernon Knaack
Secretary of Agriculture Northey,

Nutrient reduction strategy should be based on science and achieved through voluntary conservation practices with an emphasis placed on maintaining production levels, but still achieving reduction goals. Increasing funding for cost share of conservation practices would be a good start to help achieve these goals.

I use terraces, minimum or no till, and other erosion control practices to try and alleviate the loss of my nutrients. Nutrients leaving my fields is a costly problem I would like to prevent. Thomas Carson
Secretary of Agriculture Northey,

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

Please adequately fund the Iowa Nutrient Reduction Strategy, as well as the state’s other conservation cost-share programs. Iowa’s failure to adequately fund these programs in the past has delayed needed conservation projects. Kevin Sloan
We must take stronger action regarding the state's current proposal regarding excessive nutrients in our water. Many environmental groups have been working on this critical problem and it is very disappointing that their conclusions have not been taking more seriously.

Without stricter policies, the pollution of our water resources will continue and soon will be irreversible.

Some of their suggestions are noted below:

• While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

• History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

• The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

• Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

• The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

• The strategy fails to specify how pollution control plans will be implemented, how problems will be prioritized or who will make these decisions.
i have several comments.

While the state's proposed strategy recommends strict new rules for cities and industry, it falls far short in addressing agriculture's contributions to the excessive nutrients in our water.

The strategy puts the bulk of the financial burden on taxpayers and expects them to contribute toward farmers' costs at all levels.

Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses can implement immediately, the state plan recommends no minimum standard of care that farmers should follow.

History shows that relying on voluntary measures is ineffective. On average, only about 30 percent of Iowa farmers participate in voluntary programs, and 40 years of relying on this approach has done little to fix the problem.

The state plan lays out no timelines, interim goals or means of measuring annual progress toward cutting agricultural pollution. Specifying milestones and expected results is a key element of any effective strategy.

i hope someone is listening!
Secretary of Agriculture Northey,

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

I urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy.

I voluntarily practice conservation measures on my farm such as grass waterways, terraces, ponds and seeding down steep grounds and no-til farming. David Royer
The state's proposed strategy recommends strict new rules for cities and industry, but falls way short of addressing agriculture's contributions to the excessive nutrients in our water.

Voluntary measures don't work. Everything falls back on taxpayers instead of farms who are causing the problems.

In spite of the science assessment giving plenty of things farmers can do to decrease toxic run-off, the plan has no minimum standard of care for farmers to follow.

There are no timelines, interim goals, or means of measuring progress.
Secretary of Agriculture Northey,

I am writing to express my belief in, and support of, voluntary conservation practices. I am asking you to support adequate funding of cost share programs and the Iowa Nutrient Reduction Strategy. A science based strategy, it is effective and helps protect waters and land. As a farm operator and food producer, it is important to me to do all that can be done to protect our increasingly limited natural resources. Thank you for your consideration. Tim Kuehn
Secretary of Agriculture Northey,

Please adequately fund the Iowa Nutrient Reduction Strategy and the state's other conservation cost share programs.

This is a science based program developed by the Iowa Dept of Agriculture and Land Stewardship and the Iowa Dept of Natural Resources along with Iowa State University. It is a voluntary conservation program like Iowa's other conservation cost share programs. Iowa has also been commended by the EPA for developing this program.

With those programs in place, we have voluntarily installed several miles of terraces on our land. In addition we switched to no-till practices on over 80% of our ground. With those practices we have greatly reduced soil erosion and nutrient runoff on our farm, all done voluntarily. David Forbes
Secretary of Agriculture Northey,

The nutrient reduction strategy is a science and technology based approach developed by the Iowa Department of Agriculture and Land Stewardship (IDALS), the Iowa Department of Natural Resources (DNR), and Iowa State University (ISU) to encourage the adoption of voluntary conservation practices that will have the greatest benefit for water quality in the state. It uses ISU research to determine which practices are most effective when applied to Iowa’s unique landscapes. The strategy outlines these efforts in a scientific, reasonable and cost-effective manner, an approach supported by Farm Bureau members.

Some groups and individuals are already saying the Iowa Nutrient Reduction Strategy won’t work. They believe voluntary conservation practices on farms do very little to protect water. They’re calling for more regulation of farms, similar to the costly one-size-fits-all regulations imposed on farmers in the Chesapeake Bay area.

We know better! We want to continue to be part of the solution, but know that new regulations aren’t the answer. James Yenter
Secretary of Agriculture Northey,

I am writing to express my support for state funding of the recent initiatives proposed for voluntary conservation efforts. I feel that a voluntary conservation program will have far better results and producer response. If given the chance to implement some of these procedures on my own farm I hope to be able to not only stop water erosion against our drainage ditch, but to hopefully buffer some of the nutrient loss and keep it out of the water system. To date we have implemented a grass buffer along 4 miles of exposed drainage ditch, changed our manure application practices, begun sidedressing a majority of our supplemental nitrogen, while reducing our overall nitrogen needs because of it. Tillage has been reduced, and crop protecting residue has been increased to aid in wind and water erosion control. These things are and will continue to be done voluntarily because of our desire to protect the environment. Let us continue to improve that environment without expanding the size of government and forcing unneeded regulation. Richard Arthur
Please take a comprehensive vision of the problem of groundwater pollution in your considerations.

Simple, quick fixes of problems with our natural resources usually fall short of their goals.

Water is, next to air, our most vital resource. In any consideration that involves assuring lasting purity of this resource, please focus on regulations that provide tangible targets/benchmarks, monitoring, penalties, and uncompromising standards.

Thank you,

Jeffrey Moses
Secretary of Agriculture Northey,

Farmers care about our natural resources and want to protect them for future generations. I urge you to fund the Nutrient Reduction Strategy, as well as conservation cost share programs. This will keep us at the forefront of using voluntary, science-based practices to improve water quality in our state. Lawrence Jacobson
Secretary of Agriculture Northey,

I support a science-based state nutrient strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. I use a certified agronomist to make all nutrient application recommendations. My farms are soil sampled on a rotating basis so I have current information available for my agronomist to make nutrient application recommendations. All nutrient recommendations (NPK, micronutrients & macronutrients) are based on current samples for the crop that will be planted that year.

In recent years I have evolved away from fall applied nitrogen to an in season split application of nitrogen. I apply nitrogen at planting and a later side dress application. I have also incorporated late spring nitrate testing into my operation to help fine turn nitrogen rates for my corn crop.

Another practice I have implemented is applying micronutrients, based on soil tests, matched to crop nutrient needs, at planting. I also have added foliar feeding of nutrients to my operation.

While I am not sure anyone can predict what advantages new technologies will provide in nutrient management, I intend to incorporate them into my operation over time.

I am asking that you pass legislation that will adequately fund the Iowa Nutrient Reduction strategy along with the state’s other conservation cost share programs. Failure to adequately fund these programs will limit implementation of needed conservation programs. Jay Gunderson
Secretary of Agriculture Northey,

These comments are in vocal support for the Iowa Nutrient Reduction Strategy recently developed and released by IDALS, ISU, and other important stakeholders. This strategy addresses the importance of cleaner water, while also recognizing that agricultural production is too varied and quite frankly too necessary to curtail severely by ‘one size fits all’ mandatory regulations that do not take into account the diverse nature of ag production practices.

Thousands of Iowa farmers like myself have already implemented conservation practices like contours, terraces, conservation tillage, buffer strips, and no-till farming. I personally have used all of these tools as well as implementing significant feedlot runoff controls on my farm. Farmers need to be recognized for what they have already done on the conservation front and encouraged to do more.

Please support this strategy by providing funding for the voluntary conservation practices necessary to adequately implement it. Let us show that we are serious about water quality without seriously hampering our ability to produce. Thank you for your time. Gary Twedt
Secretary of Agriculture Northey,

has tremendously improved the water infiltration ability. Michael Holst
Secretary of Agriculture Northey,

Water quality, something everyone cares about whether they admit to it or not. Farmers have long done what they could to protect the great asset of clean water, most of the time without the help and funding from the government. The demands being placed on today's farmer increase on a daily basis and the help and backing those farmers receive continues to dwindle. It's time to fund a project that has science proven technology and results to help today's farmer continue to do what they have done for generations, keep the water in our rivers and streams as clean as possible. Help develop programs that work for Iowa and its situation and landscape. This can not be a one size fits all program. Stop the big blanketting regulations and develop programs that work and take into consideration the work that has already been done by farmers whose lives depend on the land and water.

Adequately funding the Iowa Nutrient Reduction Strategy as well as other state conservation programs should be the highest priority, to ensure our generation and those that follow the clean, clear water that we have always known. Jeff Gibson
Secretary of Agriculture Northey,

As a livestock and grain farmer from Eastern Iowa I realize how important keeping clean water is to everyone being so close to the Mississippi River, as well as several smaller tributaries. We need to support research done by IDALS, DNR and ISU. They have proposed a voluntary program that I feel will work with those of us in the farming community to keep our water clean and safe. The EPA’s approach is to take over and make a one size fits all approach. I believe that we are doing a good job without them using their over reaching power to implement their policies. Scott Hingtgen
Agriculture contributes very significantly to the amount of pollution in our waterways. Agriculture is very profitable these days; those that are profiting should be required to implement strategies to mitigate or prevent their pollution.

Voluntary approaches don't work. They haven't for the last 40 years. We have worse water quality than ever. We can know who is polluting by locations of feedlots and CAFO's and tile drains. Those that are polluting should be required to clean up. There are documented strategies that work that farmers could follow but they are not required to do them.

Taxpayers should not shoulder the burden when most of the few farmers that are in business today have very large and very profitable operations, or else they wouldn't still be in business.

The state has laid out no timeline, no goals or monitoring. This is unacceptable if we are to make real progress to clean up our waters.
5 years ago a Septic Plan was instituted for Jefferson County in Iowa. I supported this plan and I test my water which runs out of the septic field onto the land and eventually into the streams or ground water. CAFO manuer is "injected into the ground for crop land". The land to the north of my property and house has a stream which runs north to south thru conditute under the road. I am sure that this happens all over Iowa and eventually it enters streams and underground water systems.

No one in this State can explain why millions of gallons on manuer does not get absorbed into the soil and run off in the water and if their is a spill then major fish kills. I am sure other chemicals have the same effects. Yet my little effort of two people cleaning their waste water thru their Septic is regulated.

Its time for enforcement to have clean water in Iowa.

Rick Ryerse
Secretary of Agriculture Northey,

I commend Secretary Northey for his efforts on the Iowa Nutrient Reduction Strategy. I support this voluntary and science based path as opposed to the EPA’s one size fits all. I urge you to fund the necessary measures needed to support broad implementation of this program.

Thank you for your consideration on this issue. Kevin Jesse
Secretary of Agriculture Northey,

Having attending one of the Nutrient Strategy meetings that was held around the state which introduced the strategy, I am in favor of starting to implement it. The voluntary conservation practices need to be put into place if we are going to meet the goals set by the strategy.

Having used these practices for over 25 years on our operation, we understand how they can help the wind and soil erosion and the runoff situation. It is important however that these are voluntary-neighbors can see what these practices do and will be more likely to implement these if they do it voluntarily.

Funding should only be used to start up demonstration plots to encourage these practices. Laura Foell
I haven't studied the issue to be able to assess thoughtfully how the proposed strategy compares with other alternatives. I do wish to express my concern that the state and Iowa farmers be as cooperative as possible in efforts to restore health to the Gulf of Mexico. As consumers we suffer from the devastation of the marine ecosystem there. As Iowans we might be suffering from rivers and streams of less than ideal quality for recreation. As Americans we suffer because of the disruption to economic activity that is caused in the Gulf. And as humans we are failing in our responsibility to be stewards of the Earth. Given the current surplus in the Iowa state budget, I don't think this is a time for Iowans to worry about any negative impact on Iowa agriculture from steps taken to reduce run-off. In fact, looking seriously at this issue improves the sustainability of our own ecosystem and forces us to look more rigorously at how fertilizer etc is used, possibly saving money down the road.

I would feel more proud to be an Iowan to know that we are really doing what we can for this issue, and not looking to do simply something cheap.
Secretary of Agriculture Northey,

It is important to continue funding the Iowa Nutrient Reduction Strategy and other state conservation cost-share programs.

On my farm, I use terraces, waterways and new pond structures to lessen the effects of erosion on the environment.

Conservation practices are important to sustaining proper nutrients in the soil which in turn will produce better crops and lessen the effects of the dead zone in the Gulf of Mexico. Chris True
Secretary of Agriculture Northey,

I am writing to ask you to support and fund the Iowa nutrient reduction strategy. When such agencies as IDALS, ISU and DNR do the studies and support them that should speak volumes! We all know voluntary conservation practices work best, by funding state cost share programs it is a win, win situation for Iowa land and water! We have used the program on our farms and are working up the list again, state cost share gets the jobs done that wouldn't get done otherwise.

Thank you for listening to my concerns! Cheryl Lundgren
Secretary of Agriculture Northey,

Water and soil conservation practices in the State of Iowa are in need of your help. As farmers, we realize that we need to protect our resources so that we can continue to meet the demands placed upon us to feed the world. As commodity and farm land prices continue to rise, every acre counts. Individually, we know how to protect each segment of ground we farm and we know we can get assistance thru the conservation offices in our areas to do them right, but here is where we need your help. We urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the State's other conservation cost-share programs. There are conservation projects out there needing this funding and waiting for assistance. Now is a critical time in agriculture to protect our soils, water, heritage, and livelyhood. Without the conservation of these, what will we have left? Michael Jamison
Secretary of Agriculture Northey,

I contact you to voice my support of the Iowa Nutrient Reduction Strategy and encourage and ask for your support to fund this strategy.

The strategy is a SCIENCE and TECHNOLOGY BASED approach developed by the Iowa Department of Agriculture and Land Stewardship (IDALS), the Iowa Department of Natural Resources (DNR), and Iowa State University (ISU) to encourage the adoption of VOLUNTARY conservation practices that will have the greatest benefit for water quality in the state. It uses ISU research to determine which practices are most effective when applied to Iowa’s unique landscapes. The strategy outlines these efforts in a scientific, reasonable and cost-effective manner, an approach supported by Farm Bureau members.

I stress that the strategy is science and technology based and that voluntary adoption is being recommended. I feel that voluntary involvement is more cost effective than mandated regulations. I feel voluntary efforts coupled with public funded incentives create more of a partnership environment to accomplish the goals of environmental protection.

As farmers, we realize the need to maintain agriculture production and value the importance of voluntary conservation measures. However, Iowa’s failure to adequately fund these programs in the past has delayed needed conservation projects.

Please support and fund the Iowa Nutrient Reduction Strategy. Stanley Mattes
Secretary of Agriculture Northey,

I encourage you to support increased state funding of soil and water conservation in Iowa. IDALS has done a good job of holding down cost through times of tight budgets, but in doing so it has reduced the number of watershed projects, state technicians, state secretaries and monies to implement the conservation programs here in Iowa. The only way we can leverage federal conservation dollars is through promotion and implementation. We cannot do this without adequate staff. There is a large back log of conservation practices farmers want to install but have so few staff at the state and county soil & water conservation district level it has slowed down implementation. Please support increased funding for IDALS, WIRB and IA DNR 319 watershed projects and the staff needed to implement them. Neil Shaffer
Secretary of Agriculture Northey,

I love farming and raising livestock, and I want to pass that love of agriculture production to my children. I know that is only possible if I seek out and implement responsible production practices. I also know that regulation is not the most effective or efficient way to get people to do something, but education is. If we fund the nutrient reduction strategy we will be educating people. This will, in the long run, have the most impact. Blake White
Secretary of Agriculture Northey,

I urge to support and fund the necessary budget to implement voluntary conservation practices to reduce nutrient content in runoff water. Farmers will do practices to reduce runoff, but they will need help on some of the more expensive practices. This is a science based strategy, from our own Iowa State University and will work. Susan Knapp
The state's proposed strategy falls short in many ways:

- It relies entirely on the same voluntary approaches for agriculture that have FAILED to clean up Iowa's water.
- It puts the bulk of the financial burden on taxpayers, even though FARM BUSINESSES ARE RESPONSIBLE FOR THE BULK OF THE PROBLEM.
- It fails to set any common sense standards to restrict a handful of the most polluting farming practices.
- The strategy outlines no timelines, interim goals or means of measuring annual progress toward reducing agricultural pollution.
- It includes no explanation of how the plans will be implemented, how problems will be prioritized or who will make these decisions.

Yes, the above comments were provided by the Environmental Working Group but they eloquently express my sentiments on this matter.

People. This water pollution cannot go on. You live here too.

Virginia Rocha
Secretary of Agriculture Northey,

I support increased state funding of soil and water conservation in Iowa. Irene Lund
Secretary of Agriculture Northey,

Keeping Nutrients from washing off the land and into the waterways is very important from a cost stand point and clean water. The Iowa Department of Agriculture and Land Stewardship along with the Iowa Department of Natural Resources and Iowa State University have a plan. It is called the Iowa Nutrient Reduction Strategy. This plan will give farmer the flexability to use different practices on their farms when needed. A multi use plan is far better than just one plan. Saving these nutrients means farmers spend less to replace them. It also helps keep the water cleaner. It helps lessen the Hypoxia problem in the Gulf of Mexico.

Today I am asking for you support of The Iowa Nutrient Reduction Strategy by voting to support it with funding.

Thank you for your help. Eric Fuhrmeister
My main point is that the communication process of whatever is adopted is key. Farmers have to understand that doing nothing is NOT an option. This is voluntary right now, but with no action leading to now results, something else would follow that would not be voluntary.

I am a farmer. I believe this is the right approach. Something HAS to be done to protect water quality. We as a group are losing influence in Washington. The public is getting more removed from agriculture everyday. This is our shot at doing something that makes sense. The NON Optional approach may look a lot worse.

These points must be FORCEFULLY communicated to farmers!
Secretary of Agriculture Northey,

Farmers do a good job of using the correct nutrients to grow a crop. We don't need any mandates to protect the environment. Farmers do a good job of it voluntarily. James Wess
Secretary of Agriculture Northey,

I'm writing to express my support for a voluntary, science based nutrient reduction strategy for the state of Iowa.

I know these strategies can work. I chair the Dry Run Watershed Improvement Association, a group of area farmers who have been working together to identify the issues that are affecting the watershed we live in, and implement practices to improve the quality of the water in Dry Run Creek.

There are many other groups like ours in the state. With proper funding we can continue our efforts to voluntarily improve the waters in our state. Paul Hunter
Secretary of Agriculture Northey,

No one cares more about the environment than farmers--their livelihood depends on it.

I urge you to adequately fund the Iowa Nutrient Reduction Strategy and other conservation cost-share programs. Adequate funding and farmer concerns will combine to make a voluntary program highly successful and provide a model for other states. Such programs will help eliminate mandates from the federal government--regulations we don't want or need and that are much less effective than state and local efforts to help agriculture move forward. Thank you! Mary Van Zante
Secretary of Agriculture Northey,

I wish to express my support for a nutrient reduction plan based on scientific strategies that take into account voluntary practices that will not jeopardize agriculture production levels.

We are currently enrolled in the CSP program and practice no-till methods. This has worked very well for maintenance of our soil and plan to continue these methods as well as adding cover crops in the fall.

Please remember to promptly fund conservation projects, as the funding is necessary for daily operation.

Thank you for your timely response to this request and please remember all that agriculture supports in this great nation -- America. joni spies
Secretary of Agriculture Northey,

I would like to notify you of my support for a science based state nutrient reduction strategy. This strategy should recognize the importance of voluntary conservation practices in balance with agricultural production practices. Please adequately fund the Iowa Nutrient Reduction Strategy, as well as other cost share programs. Joe Mather
Secretary of Agriculture Northey,

This is a straight forward thought out plan that we as a state can do, it's much better if we take this on than if the Feds do it, they the fed gov. Don't know all our efforts or our needs. We as farmers can do! Eric Stall