Name Rosalyn Lehman
City Des Moines
State Iowa

Providing comment on the following sections:

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

December 28, 2012

Nutrient Reduction Strategy

ANR Program Services

2101 Agronomy Hall

Ames, Iowa 50011-1010

Re: Comments regarding Iowa s Nutrient Reduction Strategy

Iowa Rivers Revival appreciates the opportunity to submit comments regarding the Iowa Nutrient Reduction Strategy. IRR believes that this Strategy does not adequately address the huge impact agricultural practices contribute in contaminating Iowa s rivers and the rest of the Mississippi watershed s water supply. As written, this Strategy will fall short of protecting Iowa s waters. This Strategy requires revisions that include new, measured and accountable approaches to reducing agricultural chemicals in our waterways.

1. The current plan provides no accountability for farmers to implement conservation measures that significantly reduce the impact of non-point agriculture pollution. Instead, this plan maintains the status-quo by sanctioning only voluntary conservation measures by Iowa s agricultural industry to address water quality concerns. Nearly a century has now passed since government institutions have been involved with voluntary conservation efforts for non-point agriculture pollution and little progress has been made in protecting and restoring clean water to our rivers. The plan needs to incorporate new common sense conservation requirements on all farms to reduce soil erosion and protect water quality.

2. If this is the best plan that Iowa s environment, conservation, agriculture, government and university leaders can produce to protect Iowa s water ways, then the Environmental Protection Agency should oversee and manage our state s water quality on behalf of all residents and industries that reside within the Mississippi watershed.

3. The public comment period should be extended beyond the January 4, 2013 deadline to allow an opportunity for all citizens and stakeholders to better review this Strategy and provide their feedback and ideas to strengthen this plan so that the final plan will have a chance to make a positive impact on the future of Iowa s water quality.

Iowa Rivers Revival is the statewide river education and advocacy non-profit organization committed to protecting one of our most precious natural resources our rivers and streams. IRR is working to engage individuals, organizations, communities and government leaders in river awareness, responsibility, and enjoyment in an effort to improve and enhance the condition of Iowa waterways ensuring a quality, safe and lasting resource for future generations.

As river advocates, citizens and taxpayers who are impacted by the outcomes of this Strategy, we appreciate your thoughtful review of these comments and urge efforts to implement a plan that can truly improve and protect Iowa s rivers and water quality.

Sincerely,

Jerry Peckumn

Board Chair

cc Environmental Protection Agency

Timestamp 12/28/2012 3:28

Name Rosalyn Lehman
City Des Moines
State Iowa

Providing comment on the following sections:

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

Timestamp 12/28/2012 4:34

Name Jolene Riessen
City Ida Grove
State Iowa

Providing comment on the following sections:

☐	**Executive Summary**	☒	**Nonpoint Source**
☐	**Policy**	☐	**Point Source**

Are you taking into consideration that pytase is being added into hog feed and this is cutting down on the amount of P in the hog manure?

Also is the watershed areas all identified or is there more areas going to be identified like the Maple River area?

I am very happy to see a science based approach to the nutrient management of our water and am also glad to see that there needs to be a combination of nutrient strategies to clean up the water. I think farmers will be able to embrace making little changes to control nutrient run off verses one sweeping rule that some farmers may find hard to work into their farm.

How often and how will measurements be made to see how progress is being made? Will the county soil conservation offices have a report card on individual farms near creeks and streams and rivers to see how they are doing with nutrient runoff? I know on our farm we use conservation tillage, cover crops, N stabilizer products and we will be working with some notill this spring to help us manage ntrients. Are you looking to go count by county on this or are you looking at just certain areas that historically have been having nutrient management problems?

Thank you for taking the first steps to fixing the problem instead of outside groups trying to tell farmers what to do. Work with us and show us better ways and we will follow!

Timestamp 12/28/2012 5:44

Name Larry Gullett
City Center Junction
State Iowa

Providing comment on the following sections:

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

I would like to make two comments related to the proposed Nutrient Reduction Strategy which was released for comment in the last few weeks.

1. Iowa needs numeric standards and goals related to reducing nutrient and bacteria in surface waters. The numeric standards must apply to wastewater treatment systems, urban runoff and agricultural/rural inputs. In addition, the plan should also address groundwater so we don't just relocate the problem from surface water to ground water.

2. The strategy is seriously flawed in it's failure to address social and cultural education and outreach in the implementation and planning phases of the project. In fact, the plan should be written with input from public meetings around the state to identify problems and obtain input/suggestions from the public on the best way to reduce nutrients/pollutants. It seems this inclusive process was omitted in development of the strategy. In such a large effort it will be imperative that all people understand the issues so they support moving forward with implementation programs. This is especially important when asking people to participate and support such large expenditures of public funds. If we fail to inform and educate, and make a strong effort to "listen" to the people, then the program will fail before it is even started.

Thank you

Larry Gullett

Timestamp 12/28/2012 6:15

Name Dan Allred
City Corydon
State Iowa

Providing comment on the following sections:

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

I would like to take this time to express my personal interest in the nutrient reduction project. I believe we need to put in place practices to reduce lost nutrients. Im all about keeping the 800 and 900 dollar at ton fertilizer on my ground where it will do some good. It would benefit me economcially to use less fertilizer for the same yield. But you have to remember we are trying to make a living off this land and we need to be making decisions based off sound research and testing of crop responses and yields from different amounts nutrients applied. You just cant simply cit back on fertilizer rates and expect the same results. As producers, we cant afford to have regulations pushed down our throat based off some desktop agenda in the government. We need sound nutrient recomendations based off of proven results in the past. It may be that we need to explore new nutrient placement technology and timing of application.

I think there is a way to grow crops with less applied nutrients but it needs to have some research to prove that it will still result in a crop yield that is still economicaly feasable for a grower.

There are also conservation measures to be considered that can help reduce runoff and that should be considered as well. I think as producers, there should be some financial incentives offered to put these measures in place, especially where the land is being rented.

Thanks for allowing space for comments.

Dan Allred

Timestamp 12/29/2012 7:36

Name Linda Schroeder
City Nevada
State Iowa

Providing comment on the following sections:

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

I am appalled that the reversal of toxic (yes toxic, the dead zone attests to it) waste run off is such a low priority for the creators of this disaster. Voluntary only goes so far. The State of Iowa must start regulating as well as educating. Seems like withholding payments would be an effective incentive. Might also help save some of the 25% of grade A farm land Iowa used to have.

Timestamp 12/30/2012 3:44

Name Richard Fischer
City Bernard
State Iowa

Providing comment on the following sections:

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

I live on 40 acres in the Lytle Creek Watershed Project. This is part of the Mississippi River Basin Initiative.

After attending their information session on 14 November 2012, I was disappointed by the the voluntary nature of soil management fixes.

As I read parts of the Iowa Nutrient Reduction Strategy, I was also disappointed for the same reason: voluntary compliance.

One of the major problems with CAFOs and to a lesser degree with all livestock farming, is what to do with the manure. There is too much of it to spread over pasture and crop land. The practice of spreading it on snow and frozen fields still persists and much of it is place on erodible and highly erodible land or on land that is directly adjacent to streams. I watch one parcel of land that has manure spread on it between snows each winter and then watch as the creek floods the land most springs. I always wonder how much of that manure is washed down stream.

It is my observation over the past seven years of living in rural Iowa, that there is little enforcement or regulation of the amount of nitrogen being applied to fields, especially to soybeans, which probably do not need any and certainly not the large dosage from a manure spreader.

The watershed west of us recently had a large fish kill attributed to a rain event that caused an outdated manure holding tank to overflow. A fine was levied, which was a good thing, but there d id not seem any change or modification of the "faulty" holding tank and as far as I know the fine has not yet been paid.

I favor strong and effective regulation of the storage and the application of manure. I expect that there be immediate and stringent enforcement of any and all violations. Voluntary compliance will not increase the water quality of Iowa's surface waters nor of the Mississippi River Basin or the Gulf of Mexico. Offering a polluter tow or three violations before taking effective action and enforcement of regulations is the wrong approach. We have the studies, there are good models that show how to effectively, safely, and prudently store manurer and how and when to apply it appropriately. These best practices may increase the cost of farming, but they will also assure that farming will be done in a manner that will help the environment, improve our water, and have a positive effect on our air quality.

The application of chemical fertilizer needs to be greatly reduced. The best way to do so is through grass-based dairy and cattle farming. Reduce the size of all herds and allow them to forage. Move to a sustainable rather than a profit based agriculture. Most sustainable farming does make a profit, but more importantly it reduces the harm to the soil, water, and air in doing so.

My bottom line is strong effective regulations that are strictly enforced from the first violation through compliance. Hence, we need more DNR officers to do the enforcement and they need to be free from the influence of The Farm Bureau, Monsanto, and the livestock industry, and the Industrial Agricultural Industry. The Iowa Department of Natural Resources needs to coordinate with US EPA and comply with and Federal guidelines for waste management, both on the farm and in the cities.

Timestamp 12/30/2012 8:19

Name John Moellers
City Kellogg
State Iowa

Providing comment on the following sections:

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

I'm writing in response to the Iowa Nutrient Reduction Strategy that was recently released by IDALS, the Iowa DNR, and ISU. I'm concerned that the strategy's recommendations for dealing with nonpoint sources consisted of: "... targeted voluntary conservation measures, in conjunction with research, development and demonstration of new approaches...". Voluntary conservation methods are mostly what we (Iowans) been doing in regards to nonpoint sources of nutrient pollution up to the release of this study. Producers of non-point sources currently have few financial reasons to implement the changes required to mitigate this problem. Obviously we need to do something different. Whether it be a tax break, increased fees, or inspections, something needs to be done to improve compliance with the various possible methods to reduce nutrient pollution.

Timestamp 12/30/2012 9:50

Name Jay Lynch
City Humboldt
State Iowa

Providing comment on the following sections:

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

I raise Corn and Soybeans on my farm in Humboldt County. I support the nutrient strategy for Iowa. The weather is my biggest challenge every year on my farm. Nutrient Management needs to be flexible to change as the weather changes from farm to farm. I have used many best management practices over my farming career and are still using many of them today. I use strip till/ no till, terraces, waterways, filter strips on my farms. When I first started using many of these practices, I received assistance. This assistance was more than just financial, it included management ideas and past experiences. This voluntary choice to improve the environment and my farm works better than regulations. As I look at different practices to use. Some practices work best on different areas of a farm. And what works best on my farm doesn't always work best on different parts of the state. That is way I support this nutrient strategy.

Sincerely

Jay Lynch

Timestamp 12/31/2012 9:41

Name Matt Siefker
City Eagle Grove
State Iowa

Providing comment on the following sections:

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

The best solution to reduce the hypoxia zone in the gulf is for everyone to work together. Farmers should be allowed to choose which ways to help reduce nutrient runoff that best fit their operation. No operation is the same. No one has the same land. Farmers are more able to determine the best solution than someone working from behind a desk in Washington. Iowa already leads the nation in filter strips, waterways, and I believe CRP. We will continue to lead the country in keeping our water clean!

Name Patricia Fuller
City Council Bluffs
State Iowa

Providing comment on the following sections:

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

This Strategy was developed with very little to no input from stakeholders. Transparency was nonexistent. Several DNR staff submitted comments on the Strategy prior to the document's release to the general public. I am sure you have read their comments by now but just to reiterate, I quote them directly:

"Major fundamental flaws permeate the Strategy while concrete ideas for implementation are not provided.

After review of the Strategy it is clear that the development lacked diverse participation including and especially from nonpoint water quality professionals. This document reflects a narrow view not appropriate for a state-issued document. This is evidenced by entire paragraphs being copied from an Iowa Farm Bureau comment letter (without proper citation) submitted in response to the Raccoon River Master Plan, and all costs and benefits being based on production of a single commodity crop. This evidence calls into question the development of the entire document, as similar narrow-view and single-objective talking points are a consistent theme.

Further, responses to some elements of the Stoner Memo simply echo its original language, reflecting a lack of serious consideration in the responses to some of the elements. The Science Assessment evaluated a number of possible strategies that could be implemented to reduce nutrients in local and downstream waterbodies. However, the Strategy could best be summarized in two words Status Quo as the document lacks novel or innovative concepts for implementation, lacks a commitment to any measurable load reductions, and lacks accountability in tracking and obtaining progress.

The Strategy as written risks the perception of shielding the 3 percent of Iowans who farm for a living from being given the information needed to make sustainable land management decisions. This is unfair to farmers and the remaining 97 percent of Iowans who should all be served by, and have a vested interest in, the State of Iowa s

Nutrient Strategy. By associating DNR with this document, as written and without major revisions and without including a more open, collaborative process, and by releasing it as a joint IDALS/DNR document, DNR runs the very real risk of sullying our department s reputation with the 97 percent of Iowans that are not farmers, as well as with progressive conservation farmers who are seriously committed to reducing their N and P contributions to streams and rivers. Some of Iowa s best and brightest were used to help develop the science assessment piece of this document, including respected scientists, agronomists, engineers, and economists from Iowa State University. However, the Strategy does not synthesize their research in an organized way to show a path forward."

Our contribution to the "dead zone" is need of a real solution, instead of the status quo.

Timestamp 12/31/2012 2:47

Name Mark River
City Carroll
State Iowa

Providing comment on the following sections:

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

I believe we need high-tech solutions in order to solve the nutrient problem here in Iowa. One piece of technology that I think is very useful is the Wetland Builder software by Agren. In Carroll County we have used this software to help design a couple of wetlands on county-owned agricultural properties. It is a fast and economical way to do most of the design work from a computer before ever stepping foot in the field. With tight budgets and less staff in many state and federal conservation departments, this could be a way to make staff time more efficient & effective. I think making this software available statewide in NRCS offices would give conservationists another tool to effectively design wetlands (which are a critical BMP) to catch nutrient runoff from Iowa's agricultural lands.

Timestamp 12/31/2012 5:06

Name Erwin E. Klaas
City Ames
State Iowa

Providing comment on the following sections:

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

Comments on Iowa Nutrient Reduction Strategy

I have served for 12 years as a County Soil and Water Conservation District Commissioner. During this time, I have seen continual funding cuts for conservation in both state and federal budgets. The Division of Soil Conservation in Iowa is operating on a budget that is equivalent to 1994 levels of funding. Technical staff has been reduced by more than a third. Our county now shares staff (both federal and state) with a neighboring county. As of this writing the 2012 Farm Bill has not been voted on by the U.S. Congress, and consequently critical federal conservation programs have expired. Voluntary incentives have not been sufficient to accomplish nutrient reductions, especially with a reduction in technical assistance to deliver existing programs.

The Iowa Nutrient Reduction Strategy is a strategy to maintain the status quo of soil erosion and water pollution. This is unacceptable. I recommend the following:

1. Establish regional water quality standards for agricultural nutrients and pesticides, especially nitrogen, phosphorous, and atrazine based on the concept of total maximum daily loads (TMDLs). These standards should be numeric, enforceable and fair for everyone.

2. Develop a certification program for farmers based on the principles developed by the Mississippi River Collaborative. Certification should be based on system-based whole farm conservation plans.

3. Re-0rganize County Soil and Water Districts according to watershed boundaries rather than political boundaries. Provide these commissions with adequate funding and staff do their job.

4. Provide County Soil and Water Districts with authority to administer landowner certifications.

5. Transfer administration of drainage districts to Soil and Water Districts.

6. Require all counties to inspect and enforce sanitary treatment for all rural residences.

7. Develop a code of land stewardship based on land ethics and long-term sustainability.

8. Immediately begin a long-term program to improve soil health using new research based practices such as the application of composted animal manure, green cover crops, and no-till.

9. Phase out corporate-owned concentrated animal confinements and replace with more humane and environmentally sound practices.

10. Initiate a state-wide farm protection plan that will protect the most fertile soil in the world from urban, commercial and industrial development.

Timestamp 12/31/2012 10:15

Name mike delaney
City des moines
State Iowa

Providing comment on the following sections:

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

I would like to comment on the Iowa Nutrient Reduction plan.

The agricultural component of the Iowa response to the EPA request for a pollution reduction plan looks like something put together by chemical dealers and commodity groups. The plan calls for mandatory reduction of pollution from cities that accounts for about 10% of our nitrogen and phosphorus pollution, but only voluntary efforts on the part of the agricultural sector that accounts for 90% of the pollution. The plan is weak on measurement of changes that might result from any efforts and expresses minimal interest in whether Iowans will be able to swim safely or fish successfully in our rivers. One problem with an all-voluntary approach in the agricultural sector is that good actors are punished and polluters are rewarded. If a farmer does everything recommended by the Iowa State University experts to reduce nutrient loss he or she loses money. The farmer who tears out past conservation practices, installs more tile, plows every square inch of his or her land and pours on excess nitrogen and phosphorus will be rewarded with greater short term profits.

I would like to recommend the following:

1. Iowa rivers and streams in Iowa should be fishable and swimmable.

2. The Iowa DNR or the EPA should enforce the Clean Water Act.

3. Violators of the Clean Water Act should be fined.

4. The Iowa DNR should figure out how much nitrogen and phosphorous is leaving the state.

5. The State of Iowa should seriously plan to comply with the Stoner letter request for a 45% reduction of nitrogen and phosphorus in our waters.

6. The State of Iowa should set nutrient standards for nitrogen and phosphorus at levels that will protect aquatic life, the health of Iowans who use our rivers for drinking water.

7. The Iowa governor and legislature should appropriate funds for the purpose of monitoring the amount of nitrogen and phosphorus leaving Iowa s HUC 8 and HUC 12 watersheds.

8. Watersheds that are contributing the most nitrogen and phosphorus should be targeted first for nutrient reduction.

9. The best of our cold water and warm water streams should be protected so that there is no further degradation of water quality nor loss of species diversity in Iowa.

10. Monitoring should be put in place to measure actual progress in the reduction of nutrients in watersheds where best management practices have been implemented.

11. The Iowa governor and legislature should budget funds for the DNR to review and enforce manure management plans.

12. Since elevated nitrogen is toxic to some forms of fresh water aquatic life affecting river health and fishing, biological assessment of river health should accompany chemical assessment.

13. The nitrogen tax rate should be increased and the revenue generated should be used to reduce nitrogen pollution.

14. Point sources need to be more strictly regulated due to the toxic impact of high levels chloride, ammonia and nitrogen on aquatic life down stream.

15. The assumption that Iowa land owners will voluntarily apply best management practices on a scale that will produce measureable results we believe to be unfounded based on observations of past behavior.

16. Insurance subsidies should only go to farmers who embrace best management practices.

17. There should be a requirement that all streams be buffered.

Mike Delaney

1112 45th St. Des Moines, Iowa

Timestamp 12/31/2012 11:30

Name Bob Hemesath
City Decorah
State Iowa

Providing comment on the following sections:

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

I want to make a few general comments in favor of the Nutrient Reduction Strategy. I am support of voluntary nutrient and conservation practices. I utuilize all kinds of conservation practices including waterways, terraces, conservation tillage. I believe with the efforts of the nutrient reduction strategy we can utilize on a voluntary effort more of these practices.

We also utilize precision farming practices that accurately put nutrients and crop protection products where there are needed.

This strategy allows me as a producer to make more efforts to reduce the amounts of nutrients leaving my farm.

Thank you.

Timestamp 1/1/2013 7:01 PM

Name Jim Porterfield
City Martinsville
State Illinois

Providing comment on the following sections:

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

It is simply unprofessional that there is no mention, much less discussion, made in the Nitrogen Science Team's report of soil biology, humic and fluvic acids, foliar application of nutrients or nitrogen fixing azotobacter, balance of soil minerals beyond N&P or systems approaches using a combination of these practices.

I know there are farmers in Iowa that consistently produce over 200 bushel corn on less than 100 pounds of total applied N in C/C and have yield maps showing spots with 300+ bu/ac.

As an absentee Iowa land owner, and Watershed/Water Quality Specialist who has spent the last decade and a half working on nitrogen use efficiency and water quality, I will be mailing in 15 pages of comments.

Timestamp 1/1/2013 7:12 PM

Name Jim Porterfield
City Martinsville
State Kansas

Providing comment on the following sections:

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

It is simply unprofessional that there is no mention, much less discussion, made in the Nitrogen Science Team's report of soil biology, humic and fluvic acids, foliar application of nutrients or nitrogen fixing azotobacter, balance of soil minerals beyond N&P or systems approaches using a combination of these practices.

I know there are farmers in Iowa that consistently produce over 200 bushel corn on less than 100 pounds of total applied N in C/C and have yield maps showing spots with 300+ bu/ac.

As an absentee Iowa land owner, and Watershed/Water Quality Specialist who has spent the last decade and a half working on nitrogen use efficiency and water quality, I will be mailing in 15 pages of comments.

Timestamp 1/1/2013 7:50 PM

Name Mark Calmer
City Manson
State Iowa

Providing comment on the following sections:

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

My name is Mark Calmer. I live in Calhoun county and have a corn and soybean operation in Calhoun, Webster, and Pocahontas counties. I also own and operate an ag retail center, Manson Ag, Inc., and own and operate an ag drainage business, Wieston Ag, Inc.

For several years I have had many concerns about nutrient security. I believe every county should have two to three farmers and a county representative review committee to monitor run off, erosion, and nutrient security for the benefit of all.

Many little streams could be dammed for sediment and nutrient reduction at a minimal cost. This would create settlement basins that would be effective for erosion control, nutrient run off and beneficial to wild life.

Another severe problem is stream bank stabilization. I observe the loss of a foot of stream bank every year in the areas where I work. Rip rap would greatly improve that problem and there is ample availability to line the eroding areas.

I would be willing to serve on a committee to initiate a project like this. It is a shame to see our Iowa dirt wash away when it IS more managable.

Timestamp 1/2/2013 8:02 AM

Name Matthew Bormann
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I think the voluntary plan will work. On our own farm we are in year 2 of strip till for about half of our acres. The other half gets manure with conservation tillage. With new technologies such as, autosteer, GPS, and encapsulated urea nitrogen we have been able to cut back our nutirents and place them about 8" deep. At 8" that is right in place for the roots better utilize the nutrients. With a good tractor and autosteer you can plant right over these strips.

Also we have been installing more grassed waterways to filter surface runnoff. There are many fields in this state that could use more water ways.

I feel where I live in Kossuth County if everybody would do a more timely job with placement of nutrients and have a better plan of what to put on in regards to crop yields and soil tests it would help.

Getting things black with tillage has been a recent fad in our area. Cutting back on tillage and better utilizing residue managing equipment with the planter would hold soil in place and cut the amount of down stream sediment and polution during rainfall. Heavy tillage is big, especially with the amount of money people have made in recent years. More tillage does not equal better yields. Better managment helps the environment and increases profits. Matthew Bormann

Timestamp 1/2/2013 10:04 AM

Name Anonymous
City
State

Providing comment on the following sections:

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

I noted that the nutrient strategy document does not recommend a review of the DNR s manure management plan (MMP) program. While most programs for reducing non-point source pollution are voluntary, this program regulates nitrogen and phosphorus application of thousands of acres of farm ground in Iowa and therefore should be extremely relevant to the nutrient strategy.

The problem with the current MMP program is that it is outdated and results in over-application of nitrogen. The MMP program currently uses the outdated yield goal method for determining nitrogen application rates; this method is not supported by ISU and results in application rates significantly higher than what is recommended by ISU. I believe that the nutrient strategy should include plans to make the DNR s MMP regulations consistent with ISU nitrogen application recommendations.

Considering that the executive summary of the non-point source section of the nutrient strategy states that For the nitrogen management practices that consider nitrogen rate, timing, or source, the rate of nitrogen application, and specifically, reducing the average application rate of nitrogen to the Maximum Return to Nitrogen Rate (MRTN) shows the greatest potential for nitrate-N reduction , putting the Department s MMP regulations in line with ISU recommendations seems like a good place to start on a non-point source nutrient strategy.

The implementation of ISU s current nitrogen application recommendations in MMPs would significantly reduce nitrogen application rates on manured fields, which, according to current research would reduce nitrate leaching into tile lines with no reduction in corn yields.

Name Mark Gibson
City Adair
State Iowa

Providing comment on the following sections:

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

Comments on Iowa Nutrient Reduction Strategy

To: Sec. Bill Northey, Iowa Department of Agriculture and Land Stewardship

Charles Gipp, Director, Iowa Department of Natural Resources

Dear Secretary Northey,

Ecosystem Services Exchange, a venture focused on commercializing nutrient farming, appreciates this opportunity to comment on the Iowa Nutrient Reduction Strategy issued last month.

Nutrient pollution policies have been notoriously ineffective. Across the country, water quality regulation has focused on decreasing emissions from local sewer facilities, while purposely ignoring the real pollution sources (---often agriculture and other non-point sources immune from the Clean Water Act.) After billions of dollars of taxpayer funds are spent on sewer upgrades, little improvement in environmental quality is typically seen, and the regulatory cycle on these (largely) public facilities repeats itself & .again, with negligible environmental benefit. Breaking this cycle can be best accomplished by harnessing the State s expertise in agriculture and fostering emissions trading in water, as we have seen successfully implemented under the Clean Air Act. The potential cost savings that can be realized by redirecting mitigation investments to agriculture is non-trivial, as is the potential to increase farm income.

There are many constructive and precedent setting suggestions throughout the State s proposed Nutrients Strategy. The report s notion that Numeric criteria may not be the best approach for achieving reductions in nutrient loads, (page 6) is a critically important finding. The report s conclusion that a regulatory approach on nonpoint sources is not likely to achieve aggressive water quality outcomes (page 8) is similarly insightful. That Iowa is a national and global leader in the production of food and renewable fuels, so a goal of this strategy is to make Iowa an equal national and global leader in addressing the environmental and conservation needs associated with food and renewable fuels production& represents a formula for success, particularly if Iowa can demonstrate to the rest of the country how our agricultural industries can profit from innovative environmental compliance, while minimizing public/private compliance costs.

While this report is an impressive step forward, in order for the strategy to be successful, more impetus must be placed on encouraging and leveraging commercially driven solutions that materially improve environmental quality. The agricultural industry should be encouraged to compete in the environmental mitigation business, so that we do not continue to rely upon capital intensive end-of-pipe treatment and containment technologies that are ineffectual. A mix of efficient market-based, outcomes-oriented programs should be instituted which rely on private sector innovation over draconian command-and-control regulations.

The Strategy Threatens to Repeat History----With Questionable Outcomes

Across the country, municipal authorities and local governments operating drinking water and sewage facilities have been forced to attempt to clean up nutrient pollution that harms fish and fauna---even in cases where the local governments are not the primary cause of ambient water quality conditions. Since 2000, local governments have endured upwards of $65 to $80 billion in Federal Court Orders forcing new investment in capital intensive, centralized sewer treatment and containment facilities.1 To cite a few examples---- Kansas City is faced with a $2.5 Billion order; Providence, Rhode Island has spent $1 Billion on sewer containment; Ottumwa, Iowa (population 25,000) has already expended about half of their $200 Million mitigation; St. Louis is enduring a $4.7 Billion order.

In the Chesapeake where a population base across six states loads a cherished water body with nutrients, between 2001 and 2006 many of the 660 wastewater treatment plants here were directed to invest $3 Billion in Biological Nutrient Reactors and other centralized, capital intensive nutrient mitigation schemes. The result: public utilities decreased their nutrient pollution by 40 to 60 percent,[1] with no discernible improvement in ambient water quality; and, yet another cycle of environmental litigation/enforcement threatens to force Maryland and Virginia local governments to expend another $12 to $24 Billion over the next five to 10 years.[2]

Name Mark Gibson
City Adair
State Iowa

Providing comment on the following sections:

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

This pattern threatens Iowa.

Iowa s Nutrients Strategy anticipates over $1.5 Billion in near term upgrades in wastewater and sewer collection investments, while more liabilities may be unfolding for public wastewater authorities. This investment will only reduce nutrient pollution loads by a pittance (4% reduction of all N loadings; 16% of P). Meanwhile, nonpoint sources (sic, agricultural)--- representing 80 percent of the nutrient loads--- will be mitigated with voluntary programs that will require $100 Million to $1Billion per year in investments over decades.

Without improvements to the State s proposed strategy, the $1.5 billion mandate facing local sewer authorities and industry will be followed by still more mandates for wastewater and sewer collection upgrades in the future. Taxpayers are headed towards subsidizing an unending spiral of bond-financed investments in capital intensive, end-of-pipe treatment and containment systems that will ultimately have a trivial effect on environmental water quality. We ve got to find a better way.

Establish Commercial Solutions through Off-Sets and Water Quality Emissions Trading

The report provides precedent-setting scientific information on how specific agricultural based nutrient mitigation technologies and techniques have been proven to reduce nutrient pollution at a cost of 2X to 50X less than conventional, centralized capital intensive technologies. Yet the report fails to adequately address or layout the various paths that should be taken to minimize local government compliance costs by instituting all feasible pollution trading and offset mechanisms.

Under historic (federal) EPA nutrient policies no mechanisms have evolved that allow public utilities to materially minimize their environmental compliance costs by contracting with agriculture to reduce nutrient loading. Yet mitigating environmental impacts through off-set investments has been a standard operating procedure under the Clean Air Act for the private sector.

It is time to create off-set programs that foster least-cost market-driven solutions under the Clean Water Act that can minimize public and private costs. We have an opportunity to establish new markets and revenue streams for agriculture while simultaneously minimizing public environmental compliance costs. Similarly, an NPDES permitee should be allowed to minimize compliance costs through offsets and pollution reduction pooling among permitees. (i.e., pointsource to pointsource trading).

To establish such precedents, it is essential that we understand why such efforts have been met with marginal success in other States.[3] Many factors have plagued the prospects for using commercially-driven water quality trading:

Preoccupation with the creation of centralized command-and-control banks that would somehow monetize environmental investments and their effects. Preoccupation with a cap and trade style trading programs that do not treat water bodies (with or without TMDLS) equally.

Lack of measureable, proven non-point source mitigation techniques/technologies.

Trading ratios that dilute the effectiveness of NPS (agricultural) mitigation techniques/technologies, negates their economics and encourages condemnation of agricultural land.

Presumption that off-set or trading agreements cannot be consummated without a TMDL.

Legal threats concerning Clean Water Act compliance issues such as anti-backsliding.

Uncertainties created by exogenous affects, including flow (rainfall) rates and substrate, sunlight, diurnal trends, bioavailability and natural carry capacity.

Name Mark Gibson
City Adair
State Iowa

Providing comment on the following sections:

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

These issues, notwithstanding unfunded mandates, are appropriately within the purview of the States, just as adjudication of non-point sources is purely the responsibility of the States.

Recommendations Summary

In order to meet nutrient pollution reduction targets at minimal risk and cost, the State should:

a% Encourage and promote nonpoint source to pointsource, and pointsource to pointsource emissions trading and offset agreements, without creating centralized banks or trading bureaus.

a% Allow emissions trading and offsets, under existing laws, utilizing modern verification techniques and avoiding trading ratios, or similar measures that encourage farm land condemnation.

a% Immediately allow all NPDES permit holders to reopen and revise their permits in order to establish nonpoint source and pointsource to pointsource mitigations.

a% Create a commercially based Industrial Advisory Panel to provide the State with ongoing information and expertise on least-cost environmental compliance solutions.

a% Undertake multiple and diverse pilot projects, codifying environmental mitigation offsets in NPDES permits.

a% Manage and arrest future need to regulate point sources.

a% Avoid best practice mandates on agricultural producers. No minimum level of nutrients management practices should be regulated. Nutrient mitigation practices and programs should be voluntary or market-driven.

Thank you for your time and consideration.

Sincerely,

Mark Gibson

mark@ecosystemservicesexchange.com

Ecosystem Services Exchange

Adair, Iowa Denver, Colorado ST. Petersburg, FL Washington, DC

Footnotes

1. Testimony of Barbara Biggs, Government Affairs Officer, Metro Wastewater Reclamation District Denver, Colorado; Water Quality Chair, National Association of Clean Water Agencies, Subcommittee on Water Resources and Environment, House Transportation and Infrastructure Committee, U.S. House of Representatives, June 24, 2011. Proceedings from the Washington College Annual State of the

Name Mark Gibson
City Adair
State Iowa

Providing comment on the following sections:

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

Chester forum, 2012.

2. "States Working to Refine Cost Estimates for Tributary Strategies , Chesapeake Bay Journal, August 2004. Chesapeake Bay TMDL Watershed Implementation Plan: What Will it Cost to Meet Virginia s Goals? SENATE OF VIRGINIA , Senate Finance Committee Report, November 18, 2011.

3. Controlling Nutrient Loadings to U.S. Waterways: An Urban Perspective , National Association of Clean Water Agencies, March 2012 Report.

4. Letter to Denise Keehner, director of EPA Office of Wetlands, Oceans, and Watersheds, from NACWA Executive Director Ken Kirk, July 20, 2012. EPA Urged to Expand Water Quality Trading, Include Pollutants Other Than Nutrients brief.

Name Chris Hornback
City Washington
State District of Columbia

Providing comment on the following sections:

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

January 2, 2013

Nutrient Reduction Strategy

ANR Program Services

2101 Agronomy Hall

Ames, IA 50011-1010

Re: Iowa Nutrient Reduction Strategy Comments

The National Association of Clean Water Agencies (NACWA) appreciates the opportunity to comment on the State of Iowa s Nutrient Reduction Strategy released in November 2012. NACWA represents more than 280 public wastewater treatment utilities across the country, including several in Iowa. Nutrient issues are a top priority for NACWA and its public clean water agency members. Nutrient-related impacts are arguably the top water quality challenge currently facing our nation s waters and NACWA is committed to working toward science-based and rational approaches that will help achieve water quality standards in a cost effective manner.

NACWA commends Iowa for taking a multi-faceted approach that seeks to address both point and nonpoint sources. NACWA s members in Iowa, and nationwide, recognize that wastewater treatment plants are an important part of any nutrient reduction effort and stand ready to do their fair share. Indeed, many of the gains in nutrient control made to date are because of the investments and efforts already made by publicly owned treatment works (POTWs). By crafting balanced nutrient management plans, states can ensure that the point source community, including POTWs, is not disproportionately burdened.

The Iowa Nutrient Reduction Strategy is being released into a national regulatory environment that is highly focused on how states will address, or are currently addressing, nutrient pollution. The U.S. Environmental Protection Agency (EPA) and national environmental groups have been paying special attention to mitigating nutrient pollution in some of the country s most important and complex water bodies, such as the Chesapeake Bay and Mississippi River Basin. This has, in turn, focused attention on the states that contribute to these national water systems. Recent efforts at the state

level provide promising examples of how the challenge of controlling nutrients, even where numeric nutrient criteria have not been developed, can be handled nationally.

While NACWA acknowledges the Iowa Strategy s approach to nonpoint sources is a good first step, it nevertheless underscores the limitations of the current authorities in the Clean Water Act to address all sources of nutrients. Without clear federal authority to regulate nonpoint sources, provisions in the Strategy address agricultural runoff in a voluntary manner. The accountability and verification measures highlighted for these practices remain vague. In the absence of permit tracking, as will be used for the point source community, the strategy should clearly identify the tracking and reporting methods for the nonpoint community. Additionally worrisome, the funding sources for agricultural water management programs noted in the strategy, are shrinking and NACWA is not confident that the Strategy does enough to address the reality of the available funding for the suggested agricultural practices, and how that will affect the nonpoint community s voluntary participation.

Within the constraints of the Clean Water Act, the Iowa Nutrient Reduction Strategy focuses on reducing nutrients from both nonpoint and point sources in a scientific, reasonable and cost effective manner . NACWA applauds the State s efforts to attempt to address both point and nonpoint sources of nitrogen in ways that more equitably distribute the responsibility for improving water quality by reducing the release of nitrogen and phosphorus. Recent nutrient reduction efforts in other parts of the country have disproportionately sought reductions from POTWs because those reductions are more certain and quantifiable. In an effort to make reductions and show progress, point sources are being pressed to remove nutrients to the limits of technology and still face further reductions through backstop provisions if nonpoint source reductions are not made. Iowa s Strategy, on the other hand, recognizes the relative contributions from the point and nonpoint source communities and offers a reasonable and clear path forward for the point source community. In addition, NACWA strongly agrees with the Strategy s authors that flexibility through watershed prioritization and opportunities for future water quality trading are important elements.

Name Chris Hornback
City Washington
State District of Columbia

Providing comment on the following sections:

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

Iowa s strategy clearly indicates how the technology-based nutrient requirements will be implemented within the clean water community, providing POTWs with greater certainty in terms of their long-term investments. Based on the National Pollutant Discharge Elimination System (NPDES) permit cycle, future POTW permits will specify technology based limits, guaranteed to not be more stringent than 10 mg/l total nitrogen (TN) and 1 mg/L total phosphorus (TP). Furthermore, these limits will not to be made more restrictive for a period of at least 10 years once the nutrient reduction process is installed. The proposed TN and TP limits are reasonable and achievable and also reflect the clean water community s relative contribution of nutrients to Iowa s waterbodies. By providing assurance to the POTWs that the biological nitrogen removal treatment (BNR) technology approved in the permit will be in compliance for a certain period of time, POTWs will have the confidence they need to make the investments necessary to meet their permit requirements. POTWs must have certainty that they will not be asked to do even more in the next permit cycle, before any concerted effort has been made to address other sources.

NACWA appreciates the opportunity to provide these comments. Please do not hesitate to contact me at chornback@nacwa.org if you would like to discuss any of these comments further. NACWA appreciates Iowa s leadership on this issue and looks forward to continuing to voice the clean water community s perspective in the evolving national conversation surrounding nutrient reduction.

NACWA's comments will also be submitted via mail.

Sincerely,

Chris Hornback

Senior Director, Regulatory Affairs

Timestamp 1/2/2013 1:18 PM

Name Denise Schwab
City Belle Plaine
State Iowa

Providing comment on the following sections:

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

First, the leadership and committee need to be commended for their work. The combination of both point and non-point sources and the science-based approach are both huge strengths to the strategy, as well as the voluntary approach.

I am both a farm wife, and work professionally with beef producers, so my comments come from both perspectives. We no longer have a cow herd, having lost our rented pasture to the CRP creek buffer program, but I still think like a cattle producer. While most of these strategies focus on corn and soybean production, I would like to add some comments from the livestock perspective, specifically ruminants.

According to an ISU study funded by the Coalition to Support Iowa Farmers, livestock and poultry production contributes nearly $1.1 billion to household income and generates 43,000 jobs in Iowa. When meat processing is factored in, research shows a contribution of 80,000 jobs to the state with a total economic value of $19.5 billion in Iowa. Iowa s history of leading in the livestock industry is based on our efficient system of producing feed to raise livestock, and recycling nutrients to grow more feed - a complete production system. I encourage the committee to consider the additional economic advantages to this livestock-crops-system approach as you move forward to implement this strategy.

Several of the nutrient reduction strategies can have a positive effect on growing, or at least maintaining, the cattle industry in Iowa. Growing cover crops not only protects the soil from erosion and utilizes unused nutrients, but it can also produce 1 to 3 tons/acre of winter and early spring grazing or stored feed if cattlemen are allowed to harvest the forage prior to the next grain crop. Grazing recycles the nutrients removed by the cover crop to be available for the following grain crop. Mechanical harvesting moves those nutrients to other fields that may have a greater need for additional nutrients. Cover crops also fit in the double-cropping growth-mindset that US Secretary of Agriculture Vilsack discussed at the December 6 Farm Journal Forum, where he spoke about the need for a new vision for US agriculture.

Buffer strips remove nutrients filtered through the root zone, reduce streambank erosion, but can also produce 1-3 tons/acre of forage for feed if producers are allowed to harvest. Harvest restrictions which delay first cutting have a significant negative impact on the quantity and quality of forage produced. While wildlife habitat is important, producing feed for the cattle industry is also economically important to Iowa. A significant amount of Iowa s pasture ground is along streambanks, where flash flooding and winding switchbacks make crop farming difficult. However, if farmers are forced to put buffers along all streambanks we will see a further reduction in the amount of pasture land, just like we saw when the CRP program accepted streamside buffers. However, if they can fence off the buffer strips along streams but still harvest them for hay, some producers may consider rotationally grazing more productive pasture land and haying along the streams.

Extended rotations, grazed pastures and perennial cover are all practices that can support the cattle industry in Iowa, and will likely be more quickly adopted and applied by livestock farms. Even wetlands may have application to providing water sources for pastures and rotationally grazed systems, if we encourage producers to look at new and different alternatives to utilize forages.

Several times the discussion on extended crop rotations discussed the need for livestock to utilize the forage from extended rotations. If properly incentivized, I feel the entire strategy can support and encourage cattle (and other ruminant) production to grow in Iowa rather than shrink. Changing the RMA rules to allow double cropping of winter annual cover crops, haying all or 2/3's of buffer strips, pasture or perenial forages on the steepest slopes, and no penalties to harvest forages are all possible scenarios to encourage rather than eliminate cattle production in Iowa.

These type of incentives also provide an opportunity for young and beginning producers to enter agriculture in Iowa. With an economic multiplier for livestock production of 1.6, the Iowa Nutrient Reduction Strategy can both protect our water quality AND grow the agriculture and livestock industries in Iowa.

Timestamp 1/2/2013 1:26 PM

Name Doug Gronau
City Vail
State Iowa

Providing comment on the following sections:

☐	**Executive Summary**	☒	**Nonpoint Source**
☐	**Policy**	☐	**Point Source**

I support the Iowa Nutrient Strategy. The reasons: it is the only strategy that is voluntary with cost share available; it priopritizes areas that are the most troublesome as far as nutrient problems; it is not a one size fits all concept, I know on my farm that situations are much different than in other parts of the state; mandatory standards are basically not enforceable because it would create a whole new bureacracy and create standards that are not acheiveable because they would be statewide.

Timestamp 1/2/2013 3:11 PM

Name Edward McPartland
City Johnston
State Iowa

Providing comment on the following sections:

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

A CAR WITHOUT A MOTOR

I once had an automobile that was spacious and comfortable, but had a very poor engine that din't run well. This plan reminds me of that car. It is an elaborate plan with many good solutions that is not going anywhere. The history of voluntary regulation is not encouraging with regard to action-oriented solutions. Although a few, close-knit industry associations have set standards for their trade group with some success, most voluntary regulations as a substitute for government regulations have been a prescription for inaction and seem to be designed as political cover for that inaction. The recent financial crisis was in part caused by the failure of some voluntary regulations and the lack of enforcement of involuntary regulations. Farmers are often known for their individualism and are probably not going to agree on enough land treatment to significantly reduce non-point pollution in Iowa waterways.

In most states, the water in rivers and lakes are part of the commons, a resource supposedly owned by society and managed for the benefit of everyone. In the nutrient reduction strategy for Iowa, the taxpayers and ratepayers will foot the bill to clean up point pollution of Iowa's waterways. However, since most of Iowa's waterways pollution is non-point, a program of inaction will allow a minority of landowners to continue to pollute a resource (the commons) that is needed and used by the rest of society. It is, in effect, an indirect subsidy to polluters who need not act or bear the cost of their own pollution. This problem will become more acute as water shortages develop as a result of drought conditions. Several years ago, the Des Moines Water Works had to stop taking water from the Raccoon river because the algae blooms were so bad, it was too difficult to purify the water. During the most recent drought, the director of the Des Moines Water Works commented that the water flow was so low that the treatment plant was mostly treating chemicals. There was also talk about possible restrictions on water use. If water shortages continue and restrictions are necessary, and if stream water is too polluted to treat, many more people will start paying attention to this problem and asking why there isn't a real solution in place.

Additionally, I find it difficult to conclude that this is a serious proposal to deal with non-point pollution when there appear to be no standards or benchmarks in place to even measure the problem. How much nitrogen and phosphorous should be in the water? I guess that we are not going to know or are not supposed to know. Perhaps ignorance is bliss, but it won't be if we run out of treatable water. The McDonough School of Business at Georgetown University cites a study by Jodi Short and Micheal Toffel entitled "Robust Enforcment Should Complement Voluntary Regulation." The idea seems to be that there should be several stages of regulation which might include standards and some backup regulations when voluntary measures fail. In other words, there should be some consequences for a complete lack of cooperation. There does need to be some flexibility and sophistication as different types of land and land owners may need different and varied solutions to accomplish significant results. However, in the absence of more substance in voluntary action part of the non-point program, the real title of the program may end up being the "Freedom to Pollute."

Timestamp 1/2/2013 3:16 PM

Name Kevin Wilbeck
City Rippey
State Iowa

Providing comment on the following sections:

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

I have read the Summary and portions of the entire document. It appears that the same excuses used by the agriculture industry to support voluntary participation could also apply to the variety of wastewater facilities being mandated to participate. What happens if the reduction targets are not met? More waste water treatment plants?

I believe that Iowa's water quality problems stem mostly from our inability to find effective non-point source reduction participation. Acting as if agriculture isn't a major contributor won't do it. Acting as if Iowa is still filled with family farmers who participate in voluntary programs because they care about their local environment won't do it. Thumbing our nose at federal laws to the point where the EPA is threatening a DNR takeover won't do it. Waiting for the Gulf Coast fishing industry to get smart enough to sue Iowa won't do it.

God bless the bounty and economic contribution of the agriculture industry. But let us also recognize its REAL contribution to nutrient pollution so that an appreciable reversal of Iowa water quality can be achieved. This strategy falls short. We can do, and Iowans deserve, much better. Thanks for listening.

Timestamp 1/2/2013 5:03 PM

Name Nancy Miller
City Lime Springs
State Iowa

Providing comment on the following sections:

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

I would like to believe I live in a state that is committed to being part of the solution not part of the problem. We all are aware that what we dump into our rivers and streams eventually will make its way on down our waterways. I would ask that you take a better, more detailed look at what each of us can do to help improve the health of the gulf, as well as our own waterways and those inbetween. Then after careful and genuine study make some real definite plans and changes to the way things are done, to actually insure better health of our waterways and hopefully for the gulf as well.

I find it shameful that we cannot even eat fish out of most of our rivers.

Timestamp 1/2/2013 7:32 PM

Name Nick Leibold
City New Hampton
State Iowa

Providing comment on the following sections:

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

Comment RE the Iowa Nutrient Reduction Strategy:

I am a farmer in Chickasaw County, and want to express my support for your nutrient reduction plan. I think it is important that the plan has a science based approach, and that it has voluntary participation for farmers, instead of mandatory regulations. Iowa has many different regions and soil types, and what works one place may not be the best plan for other places within the state. Nutrients are a necessary part of crop production in Iowa, and with the high costs of buying fertilizer, I think most farmers would prefer to not lose their nutrients, so it is natural that farmers would want to conserve their soil and nutrients.

I have participated in several NRCS programs (CSP and CRP) over the years in an effort to do my part in protecting our water and soil resources. The practices I use includes the following: installing terraces, grass waterways, grass filter strips along streams, GPS controlled spraying to reduce overlaps of chemicals and fertilizer, grid soil sampling followed by variable rate fertilizer applications to put the right amount of fertilizer in the right places to maximize not only return on investment but also reduce the chance of losing excess nutrients to the environment, spring and fall nitrate tests for corn, no till and reduced tillage, cover crops, split application of nitrogen and reducing fall application, and reducing overall nitrogen rates.

I have participated in numerous testing experiments thru the ISA On-Farm trials to help fine tune the management of nitrogen fertilizer, but it is important to remember that the variable weather we get in Iowa can have drastic effects on nitrogen management. There can be many factors involved with nutrient management, and varies from year to year.

In the future, I want to try strip tillage that includes fertilizer placement in bands, in the row where the crop will be planted, in order to improve the nutrient efficiency, and maybe reduce fertilizer rates. I also plan to include more cover crops on my farm to reduce the possibilities of soil eroding into streams. It is important that NRCS continues to get cost share funds to help producers like me to try new technologies and ideas. NRCS has been a valuable asset to my farm operation by providing technical and financial assistance in my efforts to reduce erosion and nutrient runoff.

In conclusion, I believe that the voluntary nutrient strategy that has been developed is the best route that Iowa has to go forward in efforts to protect Iowa s water and soil resources. Thank you for letting me comment on the proposal. I think farmers and other stakeholders would be well served with this strategy.

Sincerely,

Nick Leibold

Timestamp 1/2/2013 8:26 PM

Name Tim Recker
City Arlington
State Iowa

Providing comment on the following sections:

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

Iowa s Nutrient Strategy Comments December 30, 2012

The Land Improvement Contractors of Iowa applaud the efforts of the Nutrient Strategy committee. The Iowa LICA is a group of 400 contractors that put conservation programs and practices in place on Iowa s fertile landscape.

Iowa is the leader in food, fiber and fuel production. Iowa farmers and LICA contractors work together every day to implement conservations practices on Iowa s working ground. If Iowa wants to be leader in conservation, they need to invest in technology similar to how agriculture has invested in technology. This investment in conservation technology needs to accomplish two things; first it must allow a faster delivery of conservation plans and design. Farmers do not want to wait months for a design specification. Secondly, conservation technology needs to simplify the process in order to engage the private sector in conservation planning. We need software that the private sector can implement in days instead of months or years.

The nutrient strategy calls for increasing the delivery of conservation and non point source programs in a straightforward and flexible manner. Iowa farmers and contractors understand practices available for nutrient reduction but lack technical support for non cost share programs.

Fortunately, we have a home grown company that is on the cutting edge of conservation technology. Agren, located in Carroll, Iowa has been developing software for the last 6 years that speeds up and simplifies the process of conservation planning and design. What now takes hours and days to design can be done in minutes, and is simple enough to attract private businesses to begin providing services.

The Iowa Land Improvement Contractors Association has reviewed Agren s tools and support this technology. It is cutting edge technology that would speed delivery of conservation services and get more conservation practices implemented.

Currently government offices cannot keep pace with requests for conservation practices. Every day Iowa LICA members receive requests from Iowa farmers to build waterways, before having a proper design. Farmers are not willing to wait months or years for those designs. With this new software waterways can be developed in minutes. Along with the traditional paper designs for waterways, the Agren software can provide an electronic file that contractors can load in to their blade control systems and build waterways with very little additional assistance.

Putting new technology in the hands of existing staff is far more cost effective and efficient than hiring new staff. The combined agencies of IDALS, IDNR, and NRCS need to take advantage of Agren s software development by forging a public-private partnership with Agren to develop a full suite of conservation planning tools that will increase the rate of delivery and allow the private sector to offer conservation services.

Sincerely,

Tim Recker

President of Iowa Land Improvement Association

Timestamp 1/2/2013 9:32 PM

Name Gary Zhorne
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Considering what has gone on with the Chesapeake Bay project over the last 20 years its easy to see that we don't want to go down that road here in Iowa. It seems that the E.P.A. has been using a "shot in the dark" aproch in soulving the problems there. I have not herd or seen any results saying that they have achieved any solutions. We need science-based Nutrient Reduction Strategy as developed by I.D.L.S.using Iowa State University reasurch along with voluntary conservation practices. There is also a need to maintain agricurltural production. In my part of the state water-ways and farmable tarraces seem to do a very good job of keeping our soils in place. Cover crops would also help keep N from leaching. Gary Zhorne

Timestamp 1/3/2013 7:26 AM

Name Dan Chism
City Emmetsburg
State Iowa

Providing comment on the following sections:

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

My name is Dan Chism and I am a grain farmer from Emmetsburg, IA. I have also owned and operated a commercial truck wash in Emmetsburg.

In my farming operation, I use swine manure, chicken manure, and commercial fertilizer. I am trying to be the best steward of the land I can be, as are my friends and neighbors. However, there are always things we can improve on and I strongly believe that is what Iowa's Nutrient Reduction Strategy can allow us to do. I was just at a meeting a month ago in Des Moines and heard Iowa's Secretary of Ag, Bill Northey, and Matt Helmers from ISU speek on behalf of this program. Just in the one hour I sat in that program, I picked up some very valuable information I could take home to my own operation. Iowa and agriculture are trying to be proactive here.

In the presentation I attended the topic of city sewer plants came up. I believe the idea of trading credits with crop land farmers came up, and I think that is a great idea. When I ran my truckwash, which is now closed, we did a lot of livestock washouts and we used the city sewer for our discharge. We separated the solids on site and sent the liquid to the city's waste water treatment plant. That worked for about six months, then we started having problems with ammonia and BOD. The city did not want to spend the money to fix their sewer and I did not want to build a lagoon, so I closed wy wash over a year ago. I believe this is a classic example of where a city could trade credits with a rowcrop farmer to reduce the burden of ther discharge. I don't know exactly how that is done, but I think it is a great idea.

In closing, I strongly encourage you to please give Iowa's Nutrient Reduction Strategy a chance. We can all do things to improve leaching and runoff of our nutrients, and collectively that is what we are trying to do here.

Timestamp 1/3/2013 8:02 AM

Name Ryan Lemke
City West Des Moines
State Iowa

Providing comment on the following sections:

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

I strongly support the entire nutrient reduction strategy as it is written.

Timestamp 1/3/2013 8:26 AM

Name Kellie Blair
City Dayton
State Iowa

Providing comment on the following sections:

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

1. I am thankful that the State of Iowa has come together to help get this science-based study started before we are regulated on the topic with no good data to back it up. If we are not able to do this voluntarily, at least it is a warning of what the Government will come up with down the road.

2. Voluntary efforts are difficult in this agriculture environment because prices right now are driving farmers to farm anything they can. Conservation is not in the mindset right now (unfortunately), but how do you keep this a voluntary effort?

3. How are you going to keep environmental activist groups from trying to force the agriculture industry to do ALL of the listed best management practices? They seem to think we ought to be doing anything we can, even if it does not apply or even help (for example: no till in central Iowa soils is not an option for some rotations).

4. How should farmers find the most efficient method of non-point source nutrient reduction? Will the goal focus be primarily on nutrient application or land management? How will it be decided whether or not implementations are adequate, and WHO decides whether or not implementations are adequate?

5. I believe more education on how farmers affect the environment is necessary.

   a. I've already heard people talk about how it's cities are the problem and if it's this Hypoxia thing is really REAL.

   b. How do you get farmers to believe this is also their issue?

6. How would the program go about educating Iowans? Since this initial strategy is voluntary, what incentive does a person have to attend a seminar, meet with an expert, follow a recommendation, etc.? And again, who is in charge of education/setting a standard/deciding what works, and what doesn't?

7. Attempt to train all of the fertilizer dealers and implement dealers so they at least have a decent understanding about the Nutrient Reduction Strategy and can try to relay that to their customers when developing nutrient and tillage programs.

8. Train all the county Soil and Water Conservation Districts and county NRCS offices so they are well-versed on the Strategy and can make proper recommendations and utilize their resources towards the goal as efficiently as possible.

9. Specific areas/watersheds/landform regions of the state would need to be prioritized first. Focus on those watershed areas that could benefit the most and concentrate the Nutrient Reduction Strategy efforts and funding there. However, even within these regions, farming and management practices can differ across a fence line. Setting a plan for each individual farmer/tenant isn't practical& but would creating a blanket plan across a specific area be more practical, or not, since there can be such great variation?

10. Tying implementations to something like crop insurance, for example, could be a potential way to reach/influence the majority. But, would this make the strategy "involuntary" at that point, if some sort of requirements/standards were put in place?

11. How would the program be enforced? Again, since the program is voluntary, there are immediate no "consequences" per say against someone who decides not to take part. There would need to be some kind of an incentive (mainly focusing on those who just don't care to make these changes voluntarily) in order for the plan to work. The strategy states that the EPA embraces a practical approach, where the states "emphasize implementation and rewards progress towards goal.

12. How should progress be rewarded (incentive)? How could a recognition program be in place for those farmers meeting and exceeding the Nutrient Reduction Strategy recommendations?

Name Kellie Blair
City Dayton
State Iowa

Providing comment on the following sections:

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

13. Educate grain and livestock buyers so they are aware of the Nutrient Reduction Strategy and its recommendations. Investigate if they are willing to implement preferential treatment towards those producers following the Nutrient Reduction Strategy.

14. Educate land owners who rent out their farmland. Since much of the land in Iowa is rented out, what incentives do the tenants have to implement Nutrient Reduction Strategy recommendations, especially if they do not even know if they will be farming the land the next year? The landowners are going to have to be willing to demand this from their tenants, but also be willing to take some decreased rent or contribute to the conservation practices. Develop and make available example farm leases that apply reasonable Nutrient Reduction Strategy recommendations for that type of land.

15. How could we manage the cost of these improvements? Are non-point sources expected to voluntarily foot the bill for any management improvements/nutrient application reduction consequences? What are consumers willing to sacrifice in order to implement this strategy (higher food prices)?

16. How could the success rate of this strategy be measured? If all specific issues aren t addressed or managed, is the program a success or failure? How long would it even take for a noticeable difference/ability to measure progress?

Timestamp 1/3/2013 8:57 AM

Name Janet Ferguson
City St. Louis
State Missouri

Providing comment on the following sections:

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

Thank you for the opportunity to comment on this strategy, the Nutrient Reduction Strategy.

My comments will be general, in favor of this approach of reducing nutrients that reach the Gulf Waters in order to promote an ecological balance of marine life in the Gulf of Mexico.

I believe we must all work together, up and down the Mississippi River, to achieve this goal.

Please seek ways for more citizens to become involved in these issues! Thank you.

Janet Ferguson

Name Nancy Bohl Bormann
City Lu Verne
State Iowa

Providing comment on the following sections:

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

Comments/Questions/Issues with the Study:

1. We are thankful that the State of Iowa has come together to help get this science-based study started before we are regulated on the topic with no good data to back it up. If we are not able to do this voluntarily, at least it is a warning of what the Government will come up with down the road.

2. Voluntary efforts are difficult in this agriculture environment because prices right now are driving farmers to farm anything they can. Conservation is not in the mindset right now for all(unfortunately), but how do you keep this a voluntary effort?

3. How are you going to keep environmental activist groups from trying to force the agriculture industry to do ALL of the listed best management practices? They seem to think we ought to be doing everything we can, even if it does not apply or even help (for example: no till in central Iowa soils is not an option for some rotations).

4. How should farmers find the most efficient method of non-point source nutrient reduction? Will the goal focus be primarily on nutrient application or land management? How will it be decided whether or not implementations are adequate, and WHO decides whether or not implementations are adequate?

5. Why is agriculture the only addressed source of non-point source pollution addressed in the report? By ISU s own admission there are other non-point sources that have not been addressed in the report. ISU cited erosion of stream banks containing legacy phosphorus buildup as one other major source. It appears that agriculture is being singled out. How can any significant reductions be achieved if ALL sources are not addressed and the burden of reduction be unfairly laid on just a few sources.

6. With regards to the land valuation that is to be taken out of production for buffer strips and wetlands, that land is being under-evaluated by the report and is lowering the cost of implementation. The report used ISU average cash rental rates as the cost to take land out of production. However, farmers and landlords will tell you that the ISU rental rates are low and do not reflect the going current rate for farmland rental. Plus on top of this low rental rate being used, the report failed to account for the lost profit potential on those acres taken out of production.

7. The report suggest that part of nitrate run off reductions could be achieved using the Iowa State University Extension Nitrogen rate calculator to determine the Maximum Return to Nitrogen(MRTN). It is unrealistic to expect farmers to reduce the nitrogen application rates to what amount to a rate for an average yield. After all average yields are set by the extremes, both high and low. Farmers have to apply fertilizer for the maximum crop yield possible in order to feed the world and be competitive in the market place.

8. The report appears to partially ignore point source pollution. Why does it affect only the 130 largest point source polluters? If we use this same logic for non point-source polluters then should this report only affect the 130 largest farmers in the state? Yet it seems that this report is intended to be a guide for every farmer in the state. Point source and non-point source polluters are not being held to the same standards. It is much easier for the point source polluters like municipalities to implement changes because they can bill their customers directly for the new costs incurred. Farmers cannot do that!

9. Regardless of which set of management practice changes would be adopted from the report to be used to reduce non-point phosphorus and nitrogen run off to the desired goals, the cost is staggering. There is no way that farmers can be expected to use any of the suggestions from this report if they are ultimately expected to bear the costs themselves totally. In a more average farm economy that has substantially lower and more normal profit margins, the costs of these new practices could actually be the difference between a loss or profit on a lot of operations with a rented land base. If the public feels that non-point phosphorus and nitrogen run off is a concern, then they will have to be willing to pay increased food costs at the grocery store.

Comments/Questions/Issues on Strategy Implementation:

10. I believe more education on how farmers affect the environment is necessary.

    a. I ve already heard people talk about how cities are the problem and if this Hypoxia thing is really REAL.

    b. How do you get farmers to believe this is also their issue?

Name Nancy Bohl Bormann
City Lu Verne
State Iowa

Providing comment on the following sections:

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[X]	**Policy**	[X]	**Point Source**

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12. Attempt to train all of the fertilizer dealers and implement dealers so they at least have a decent understanding about the Nutrient Reduction Strategy and can try to relay that to their customers when developing nutrient and tillage programs.

13. Train all the county Soil and Water Conservation Districts and county NRCS offices so they are well-versed on the Strategy and can make proper recommendations and utilize their resources towards the goal as efficiently as possible.

14. Specific areas/watersheds/landform regions of the state would need to be prioritized first. Focus on those watershed areas that could benefit the most and concentrate the Nutrient Reduction Strategy efforts and funding there. However, even within these regions, farming and management practices can differ across a fence line. Setting a plan for each individual farmer/tenant isn t practical& but would creating a blanket plan across a specific area be more practical, or not, since there can be such great variation?

15. Tying implementations to something like crop insurance, for example, could be a potential way to reach/influence the majority. But, would this make the strategy involuntary at that point, if some sort of requirements/standards were put in place?

16. How would the program be enforced? Again, since the program is voluntary, there are immediate no consequences per say against someone who decides not to take part. There would need to be some kind of an incentive (mainly focusing on those who just don t care to make these changes voluntarily) in order for the plan to work. The strategy states that the EPA embraces a practical approach, where the states emphasize implementation and rewards progress towards goal.

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Timestamp 1/3/2013 12:11 PM

Name Vance Hjelm
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Yes! Finally a science-based nutrient strategy for voluntary practices in Iowa that include all stakeholders in our effort to conserve soil and water quality and still maintain agricultural production! I've said for years that I don't understand why we aren't all in agreement about putting our heads TOGETHER and working on any problems, instead of always sniping at the so-called "others."

Our family has put soil conservation and water quality practices into effect such as taking out intakes and installing french drains, fencing around our swamps to keep cattle out, tiling to improve drainage and at the same time increase the absorption of the farmed land, and using minimum and no-till practices to decrease soil run-off. Even though we don't have much highly erodible land, the use of a cover crop in the fall is an option we are looking at for future use.

Thank you for your efforts to install a voluntary and science-based strategy for the reduction of nutrients lost in Iowa. Vance Hjelm

Name Samantha DeWitt
City Gladbrook
State Iowa

Providing comment on the following sections:

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

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City Gladbrook
State Iowa

Providing comment on the following sections:

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Timestamp 1/3/2013 1:19 PM

Name Eric Jellum
City Osage
State Iowa

Providing comment on the following sections:

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

Can we come together to evaluate all of our concerns and compile a ranking of practices that most effectively and economically address as many objectives as possible? In much of the Corn Belt soil is being lost at a higher rate than it is being regenerated. It is critically important that we preserve our agricultural production capacity by promoting and providing financial incentives to protect our soils. Of course we cannot do that at the expensive of our downstream environment as we are doing now. So your efforts to evaluate cost-effective practices to reduce nutrient flow off our fields is critically important as well. In addition, the changing climate will likely make erosion, runoff, and flooding events more severe. The models being developed by the Iowa Flood Center to evaluate flood mitigation strategies and buffer the flow of water through our watersheds are comparable to what your group has done for nutrient flux reduction. A list of practices intended to reduce nutrient loss to the Gulf of Mexico should be compared to similar lists for protection of soils or flood mitigation or wildlife habitat enhancement so that the practices that cost-effectively address all of the concerns simultaneously when possible can be identified. For example, tillage practices and cropping systems that keep soil in place will not only maintain soil quality but will keep eroding soil from filling up streams and rivers. Wetlands could be designed better with flood control in mind. Better buffering of water quantity through the stream and river system would decrease the amount of resuspension of stream bank and bottom sediments that may have pronounced effects on phosphorus flow to the Gulf of Mexico. Wetlands might get a higher ranking than biofilters because they also settle sediment, mitigate flooding, and provide wildlife habitat in addition to denitrifying tile drainage. Cover crops, contour tillage, and perennial crops might get higher rankings than edge of field practices because they also help to keep soil in place and in good health. Some measures may impact only water quality but be so cost-effective that they would still rank high. Changing P fertilizer sources from DAP or MAP to TSP (or a comparable liquid fertilizer) would have pronounced impacts on water quality since most P fertilizer is fall applied, and the accompanying N is often ignored in producer s N fertilizer budgets. A concerted effort to change demand to this end should eventually effect the necessary supply side changes in the fertilizer industry. A campaign to convince producers and landowners that maintaining soil P levels in the optimum range is not mining the soil and convincing producers to apply P below the soil surface whenever possible should also have big impacts on water quality at very little cost. These behavior changes would cost farmers and taxpayers essentially nothing

Timestamp 1/3/2013 1:29 PM

Name Curt Zingula
City Central City
State Iowa

Providing comment on the following sections:

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

It's crucial that conservation education be a foremost priority! Two of the best nutrient reduction strategies are tile outlet bio-filters and cover crops. With many farmers unfamilar with bio-filters, it would be foolish to expect that thousands of 70, 80, and 90 year old absentee landowners will consider installing such.

Cover crops are also misunderstood. I noticed several of my neighbors tilling their ground bare in order to plant COVER crops. Going into winter, those crops were nothing but 2" hairs expected to protect the soil from melting snow and early spring rains.

Timestamp 1/3/2013 2:27 PM

Name Brad Johansen
City Decorah
State Iowa

Providing comment on the following sections:

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

To whom it may concern,

The following taken directly from the Executive Summary

The Iowa Nutrient Reduction Strategy is a science and technology--□ based approach to assess and reduce nutrients delivered to Iowa waterways and the Gulf of Mexico. The strategy outlines voluntary efforts to reduce nutrients in surface water from both point sources, such as wastewater treatment plants and industrial facilities, and nonpoint sources, including farm fields and urban areas, in a scientific, reasonable and cost effective manner.

Under know circumstances should this be voluntary. I believe good science does and should lead to good data driven decision making. I believe good science must be independently peer reviewed and free of political bias. If we know what the best practices are for each ecotype or watershed or even at a springshed level we should make it mandatory. Do not kid yourselves. The worst stewards are not volunteering to change there poor practices.

Thanks for your efforts,

Brad Johansen

Timestamp 1/3/2013 3:06 PM

Name Dianne Grayu
City Washington
State Iowa

Providing comment on the following sections:

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

My understanding is that the number of small cities/towns with little or no sewage treatment is quite significant. According to your strategy and assessment, only the larger sewage plants make a significant contribution to the nitrogen and phosphorus in the water. I find it hard to believe that raw sewage from hundreds of small point sources would not be making a significant impact on the water. What are other states doing about small communities (population in the hundreds or less) that find sewage treatment "unaffordable"? How can we expect people on farms to make sacrifices to improve water quality while lots of small towns are contributing untreated or hardly treated sewage into the streams?

Timestamp 1/3/2013 3:57 PM

Name Mark Rasmussen
City Ames
State Iowa

Providing comment on the following sections:

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

The team behind the comprehensive science assessments offered in the new Iowa Nutrient Reduction Strategy should be congratulated. The scientific assessment portion of the strategy is an important first step, offering an excellent baseline and tool to address Iowa s nutrient pollution issues.

Nearly all of the practices evaluated have some history of research investment by the Leopold Center for Sustainable Agriculture, stemming from the Center s mission as specified in the 1987 Iowa Groundwater Protection Act. Notably, the current strategy includes joint consideration of point and nonpoint sources, the goal of prioritizing investments, recognition of the need for continued research, and the idea that market and evaluation mechanisms are needed to ensure widespread adoption of the necessary practices.

However, the strategy could be more explicit about how additional data can be incorporated into the tool. It is not clear how this will happen, or how users can be made aware of new data and related practices. For example, the Liebman et al. 2008 rotation research now offers water quality measures that were not available when the practices table was assembled.

A primary concern relates to the strategy s expectations for achieving significant water quality improvements. Encouraging responsible soil and water management is important, but if Iowa is truly intent on enhancing water quality, attention needs to be directed beyond the outward symptoms (too much N and P in the water) to the social and economic environment that creates them. After 25 years of Leopold Center experience in supplying modest amounts of funding for agricultural conservation research, a key lesson learned is that achieving the kinds of goals proposed in the plan is more about the relationships among people, science and the environment rather than merely summarizing the available science. Mustering the economic and social will to make changes is the real challenge. One can be hopeful that the necessary will can be found.

The Iowa Nutrient Reduction Strategy is a tool that has the potential to open the door for Iowans to start thinking and acting differently about water quality management. The Leopold Center experience shows that convening a variety of partners, stakeholders, and researchers around science-driven practices and a systems approach can lead to viable options and actions for change. Successful implementation can occur when citizens and businesses come together and agree to leverage limited resources to create something bigger and better, a collaborative effort uniquely suited to Iowa.

There is a reasonable expectation that Iowa s future will include agricultural systems that strengthen positive relationships among soil, water, and people. The Iowa Nutrient Reduction Strategy can be used to further that vision.

Timestamp 1/3/2013 4:09 PM

Name Matt Myers
City Conrad
State Iowa

Providing comment on the following sections:

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

Most farmers are good conservationist. In my fifteen years of as an Agronomist and a Certified Crop Advisor, I have seen voluntary programs for nutrient management work with tremendous success. When it come down to the nutrient recommendations for corn, soybeans, or hay it still comes down to economics that being said the most economic efficient decision will be the most environmentally friendly . No farmer wants to spend more than is necessary to produce optimum yields. Furthermore what I believe that needs to happen is the Environmental community needs to be in tune with modern agriculture and educated on the farm and a much broader dialogue begin if we all want to succeed. Education of both parties needs to be the first step.

Name Gary Siegwarth
City Elkader
State Iowa

Providing comment on the following sections:

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

Relying on voluntary conservation efforts won t work! Please do something more than voluntary efforts to protect our waters!

Please reconsider a tougher plan of action for cleaning up Iowa s valuable water resources. When the proposed plan to clean up Iowa s water resources offers language directly linked to Farm Bureau, then you know Iowa s future is being dictated by corporate agriculture. Profits, not conservation is at the top of their agenda. It seems embarrassing that those experts in the know, those out monitoring our water quality across the state appear to have little input and were not consulted in development of a plan to help clean up our waters. If this is the best we can do then its time to bring in the EPA to do it for us.

The slow destruction of the landscape and our water is a cultural flaw that runs deep, but is not irreversible. It would take courage at both the state and federal levels to correct, maybe even a conservation revolution of the people who, unfortunately, are generations out of touch with their actual connection to the land. Even fewer recognize the need for them to understand and comment on this strategy. The conservation revolution would have to begin by redefining land stewardship as giving something back to the land and redefining landowner rights as landowner responsibility

A large part of Iowa s problems also stem from the lack of courage by Farm Bill legislators to enforce existing conservation compliance or to tie conservation compliance to programs such as Federal Crop insurance. An example of how out of touch our legislative farm leaders are comes in the form of a quote at a recent Chuck Grassley town hall meeting. When a local farmer voiced concern with soil erosion, Senator Grassley responded: You tell who ever told you that, that the problem of soil erosion ended 25 years ago when farmers were required to have a conservation plan as part of being in the farm program.

Now back to the Iowa landscape. If you drive across the Iowa landscape, it doesn t take a rocket scientist to evaluate the broad scale noneffectiveness of voluntary conservation efforts. Examples of voluntary efforts are on visual display for all to see in the form of smoldering tree piles, tiling machines, blanket fall tillage, manure spread on snow covered fields, and anhydrous ammonia tanks that dotted the countryside this past fall. A whole host of payment-based conservation programs and proven practices have been available for years. Where are all the stream filter strips and buffer strips along streams and rivers? Where are the shelter belts, field borders, and restored wetlands?

A few years back an Iowa State University Ag Economist told the joint Fish & Wildlife Society that we should not worry because as commodity prices climb higher farmers will not feel as pressured to till as much less productive and vulnerable land. What has happened instead is that more producers have gone road ditch to road ditch to till every acre possible. Even the smallest areas of vital habitat have been cleared at an unprecidented rate.

Streams and rivers are the ultimate measure of what happens on the land. Water quality has not improved. The gulf hypoxia zone continues to increase. Rivers are inundated with fine silts on the floodplains and excessive sand loads in the channel covers critical habitat of aquatic organisms like a barren flowing desert. Flooding has worsened due to continued alterations in the watersheds and that trend will become glaringly more evident when heavy rains return. The barometer of the streams and rivers are trying to tell us something and it seems that message is not what we want to hear. So we simply ignore the visual facts that things are not improving and will continue to get worse.

If a factory can t have a pipe dumping effluent into public waters than why should the business of agriculture? We don t offer industry billions of dollars in funding and then hope for the best in their voluntary efforts. Agriculture is a multi-trillion dollar industry that is degrading the common resources of the people and species we share the land with. Agriculture receives billions of dollars in Federal aid and subsidies and is required to give nothing back in return. Its time for industrialized agriculture to do its part by being mandated to do the right thing in its pursuit of maximum profits and guaranteed subsidies. A recent survey showed that nearly 75% of Iowa farmers are completely debt free. They bid up land to unprecedented prices and buy larger expensive equipment, while giving little back to the land or to the common resource from which their profits have been taken. Why should additional public funds have to be invested for them to clean up their act? Why should nutrient reduction be at the mercy of additional public funding when agricultural profits are soaring?

Any one of us could get a citation and be fined for the most simplistic and meaningless social violation of not having a life jacket along as we paddle down river in a canoe, yet the much larger ecological tragedy to the landscape, the water, the aquatic species, and the people goes ignored by legislators and unregulated because of strong political lobbying. Its time to put the industrialized agricultural model on a level and moral playing field by having the regulatory courage to stand up for what is right by forcing them to do what is right. Modern agriculture has already had the chance to do that voluntarily and has failed miserably.

I have provided some visuals to show first hand the impacts to water quality. These are from Iowa s largest spring, Big Spring, which show the water quality impairments that have made their way into an underground aquifer. Huge silt loads and organic material with very strong manure orders come out of the spring after heavy rainfalls and during spring snowmelt. Water samples during snowmelt show ecoli bacteria

Name Gary Siegwarth
City Elkader
State Iowa

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levels in excess of 3,000 organisms per liter. Nitrate levels have soared in recent years as additional acres of land going back into row crop production overwhelm any conservation efforts. Although a few landowners in the watershed do a great job and understand their connection in the watershed, most do not even realize the impacts or their connection to the spring. (I will be sending these pictures because they are a very good visual testimony to past voluntary efforts and this forum does not allow for attachments which tell the real story)

Gary Siegwarth

Elkader

Timestamp 1/3/2013 4:56 PM

Name Hubert Hagemann
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

We support the Iowa s Nutrient Reduction Strategy because it is using scientific-based research to help

framers and landowners voluntarily adopt practices to help improve the state s air and water. Farmers have already used practices that have considerably improve the situation from the past the air and water quality. This strategy will help them to do more for the state s air and water by developing practices that fit the needs of the situation rather than the one-size-fits-all that will be much more practical and cost effective.
Hubert Hagemann

Timestamp 1/3/2013 6:58 PM

Name David M. Meyer
City Tipton
State Iowa

Providing comment on the following sections:

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

I'm a land owner in Cedar co. The Rock Creek runs through my farm. I'm former associate soil and water consevation commissioner in Cedar co. I've coordinated water monitoring with IOWAWATER,Cedar co. snapshots. I know and I've seen what's going on.

As a landowner,kayaker and fisherman in my watershed, I support "edge of field" buffer strips as an important immeadiate step to reduce soil erosion and nutrient loads. I see every year rows of corn that fall into streams. I believe some sort of buffer strips should be mandatory. Allowing livestock unfettered access to streams is also a HUGE problem.

Thank you,

David M. Meyer

Feel free to call 563.357.0772

Timestamp 1/3/2013 9:05 PM

Name Joe Thraenert
City Elma
State Iowa

Providing comment on the following sections:

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

I believe that we need to ban together as Iowans and Upper Midwesterners, using common sense dialogue and scientific realism to protect our industry and the large contribution that it makes to the Iowa and U S economies. I am enrolled in the CSP Program and use no-till, minimum tillage, buffer strips, side dressing of UAN, etc. I do believe that ISU is antiquated with their recommendations for P & K, for the yields that we are raising and will continue to increase these yields. ISU is holding production agriculture back and needs to reassess, and work with the producers of Iowa and the Upper Midwest to move forward and be a profitable industry, as well to be strong into the future for the following generations.

Timestamp 1/3/2013 9:05 PM

Name Joe Thraenert
City Elma
State Iowa

Providing comment on the following sections:

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

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Timestamp 1/3/2013 9:21 PM

Name David Reis
City Decorah
State Iowa

Providing comment on the following sections:

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

I have lived in the Upper Iowa River Valley for most of my 63 years. Since the 1980's I have closely observed the area between Riceville and Decorah. The ditches, fence lines, small creeks, wet spots, have been drained and largely corn and hog farmed. The vast majority of habitat has been obliterated. The streams and rivers are seasonally flooded with poop, mounds of stinky foam. Farmers are paid over and over again to put in grass strips, they partake in conservation CRP abuse, crop insurance abuse, subsidy for bulldozer work, etc. etc. For all the little critters and for all rural residents, and the pollution and chemicals we rural residents have to endure, the current coalition of Ag. departments and services, DNR, soil conservation services...seems to be a joke and representing only a few. I fear for our future if organizations such as yours don't get serious and start being proactive for our dwindling environment.

3342 chimney rock road, decorah, iowa 52101

David Reis

Timestamp 1/3/2013 10:23 PM

Name Robert De Haan
City Sioux Center
State Iowa

Providing comment on the following sections:

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

The nutrient reduction strategy does a very good job of summarizing what is currently known about nitrogen and phosphorous losses from agricultural landscapes. The recommendatios for reducing these losses would almost certainly be effective if implemented.

The implementation strategy is clearly the weak link in the strategy. It relies primarily on education, and that will not be sufficient to bring about timely changes in today's profit-driven agricultural environment.

A combination of economic incentives and disincentives needs to be examined. It is possible that a well-designed policy could provide meaningful economic rewards to agricultural producers with minimal nutrient losses by transferring funds from those producers with the highest losses. A tax on fertilizer sales might also be used.

The proposed strategy could be strengthened by looking for additional ways to promote change. Agricultural practices that sequester carbon (perennial crops, cover crops) also generally do a good job of retaining nutrients. The state should explore the development of a well-organized market for carbon credits. This market could then be promoted domestically and internationally.

Perenial crops clearly reduce nutrient losses. Although there are a number of perenial forage crops available, there aren't any herbaceous perenial seed-producing crops well adapted to the state. A cooperative private-public research effort designed to develop such crops might be an effective long-term strategy and should be considered.

The current level of state support for agricultural conservation and nutrient retention is minimal. Supplemental state funding for the federal Conservation Security Program may be an effective use of funds, and should be explored.

If the state's nutrient reduction strategy is to have a timely impact, economic incentives and disincentives will need to be part of the package. Involving some of the state's top policy personnel in this strategy could substantially strengthen the proposed plan.

Name Mark S. Edwards
City Boone
State Iowa

Providing comment on the following sections:

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

I have extensive files related to Iowa s water quality issues dating back for many decades including data, scientific studies, and media coverage. I retired from the Iowa DNR after thirty years of service as Trails Coordinator. I had a window cubicle in the central office facing the capitol in Des Moines. I have inside knowledge of the politically dominated, debauched Department. I have personal accounts including documentation of illegal activities not addressed by DNR staff until the former Governor; Tom Vilsack stepped in personally to enforce the law. Things have gotten much, much worse since Vilsack left.

I have spent a considerable amount of time on the rivers in Iowa searching for artifacts, paddling, fishing and developing the Water Trails Program for the DNR. With the recent shortage of water in the streams it has become difficult to walk on the bottom and not slide on the green slim produced by the lethal doses of nitrogen being dumped into them. Having lived directly by the Des Moines River for forty years I could describe the continuing loss of wildlife and water quality I have personally observed. I could easily go on for many pages with information and personal accounts of how insane we are to allow our water to reach this level of loss and lifelessness.

I could focus on the human-centered atrocities in costs both economically, physiologically, and psychologically to maintain our drinking water, livelihoods, recreational opportunities, health, ethics, morals and offenses to our senses. I could try and reason about the more-than-human devastation we have done to the world of other species. For example, the Lesser Scaup Duck, the most common diving duck in North America cannot even fly across our state without starving to death or losing so much body weight it cannot reproduce due to our sickening water quality. I could lament the continuing death of the fish, clams, frogs, birds, plants and aquatic habitats with the hope of stopping the killing.

I could talk about the science of Ecology which teaches us we cannot cover two-thirds of Iowa s 36 million acres in just two species and expect to sustain the soil, the lives of the people or the other species necessary for all life to continue. I could talk about sustainability in relationship to water quality and agriculture which is a joke as we have lost over half or our topsoil in the last fifty years with all our conservation practices in place and have the worse water quality ever. I could talk about the lack of education and understanding we all have in regards to how this world of water even works.

I could do this for many pages but I feel it would be a waste of my time and yours. Things have gotten so bad in state government I have no hope in Iowa s money/power-driven, human-centered, selfish political world of corporate control to even begin to formulate the correct questions let alone address the problems. I also have lost faith in our federal government doing anything with the recent farm bill and budget decisions within the EPA and USDA along with their previous staff reductions. I believe the pseudo-science now being taught at my alumni institution, Iowa State University will be but endorsements for corporate agriculture and the death of diversity by exchanging dead frog skins for dollars.

Therefore, I have little recourse but to say I am appalled, ashamed and yet motivated to fight this shallow, short-term thinking, death-determining delirious dream of voluntary compliance for the rest of my life. If you can t be shamed into doing the right thing then you must be forced which is exactly what the EPA must do to the government of Iowa by enforcing the Clean Water Act as it was intended.

Timestamp 1/4/2013 1:06 AM

Name Steve Ballenger
City Ankeny
State Iowa

Providing comment on the following sections:

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

After reading the Nutrient Reduction Strategy, I am struck by the fact that voluntary conservation measures are recomended to continue as a viable way to solve Iowa's present and future water quality issues.

I moved to Iowa in 1989. I hunt, fish and have paddled hundreds of miles of Iowa streams and rivers. My passion for supporting water quality issues has come about as a result of seeing first hand the human and agricultural pollution in Iowa's rivers. I can see that many farmers have taken steps to reduce pollution and erosion into our rivers. There are many more who are doing nothing and have even begun planting even closer to rivers and streams.

I believe Iowa is way past the point where voluntary conservation measures will reverse the trend of highly polluted waterways. In my treks along Iowa rivers, I've seen examples like the farmer who plants right up to the waterline on the beautiful Yellow River for over a half mile. Cornstalks growing horizontally out over the river with twenty foot cliffs of highly erodible soil cascading off into the river. I've seen the same example north of Garber on the Turkey River of over a mile of cornstalks sliding into the river. I've stepped off rockbars on the Upper Iowa River into three feet of fine silt. I've seen the bubbling mucks and phosphorous blooms. I am not convinced that every farmer will do the right thing and many, succumbing to production greed, are making water quality worse in Iowa.

It is the many farmers who have no interest in voluntary conservation measures that need to be regulated now. They are polluting Iowa's rivers and waterways. The Iowa Farm Bureau would like us all to feel good with warm fuzzy messages of what this or that farmer is doing to conserve and be greener but I've seen mostly the opposite of that in my ground's eye view from the rivers. We treat rivers as sewers in Iowa. We've been doing it for over 100 years. If the Nutrient Reduction Strategy calls for more voluntary conservation measures, we will fall far short of our goals and business as usual will continue to proliferate.

If the Iowa Farm Bureau and the Iowa Department of Agriculture & Land Stewardship are to be considered responsible advocates of clean water then let's look at their deeds not their words.

In 2009, the IFB was invited to join the Iowa Water & Land Legacy campaign inorder to pass an amendment change by popular vote to create the Natural Resources and Outdoor Recreation Trust Fund. The trust fund would begin to systematically address failing water treatment plants and even augment federal conservation enrollment programs for farmers. After initially showing interest, the IFB quickly turned against the idea and began it's own campaign of lobbying against the constitutional amendment. The amendment was passed by over 63% of Iowa voters. IFB's role in fighting the amendment created much malcontent within it's ranks by farmers who supported the amendment.

In 2011, the IFB attempted to push a bill through the Iowa Legislature essentially placing Iowa Department of Natural Resources water quality programs under control of IDALS. This also failed after calmer heads prevailed. IFB and IDALS wanted farmers and non-farmers alike to believe that we should put "the fox in charge of the hen house". Unbelievable! And in 2012, IFB again attempted to push a bill through the Iowa Legislature to make it illegal for the IDNR to purchase any private land - period! That would mean that if the Nature Conservancy, the Iowa Natural Heritage Foundation or any other nonprofit conservation organization had identified and purchased environmentally sensitive lands, they could not recoup their funds for a future project by selling the existing project to the IDNR for management and recreational use by Iowans.

IFB and IDALS are waging a war on the IDNR while governor Terry Brandstad can sit quietly on the sidelines(in the pocket of big farm interests) and direct them like puppets. The goal of IFB, IDALs and governor Brandstad is to weaken the IDNR to the point that they cannot make any enforcement decisions. They can then blame the IDNR for not making decisions and strip them of their manpower and authority. Meanwhile, the Environmental Protection Agency has mandated the IDNR to make strong enforcement decisions or face regulation.

As someone who has seen firsthand the magnitude of pollution and erosion in Iowa's rivers and streams, I welcome regulation by the EPA. Big farm interests are waging a war on the IDNR, Iowans and water quality. They are smiling and telling everyone how much progress they've made through voluntary conservation measures.

Let's make the IDNR stronger. Let's ask for EPA oversight. Let's work together and create a strong comprehensive plan for water quality and water security involving all Iowans.

Steve Ballenger

Timestamp 1/4/2013 1:06 AM

Name Steve Ballenger
City Ankeny
State Iowa

Providing comment on the following sections:

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

Ankeny, IA

Timestamp 1/4/2013 7:52 AM

Name Iowa Farmers Union
City Ames
State Iowa

Providing comment on the following sections:

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

While the Iowa Nutrient Reduction Study addresses concerns that are paramount to Iowa Farmers Union doctrine, we endorse stronger enforcement of agricultural related Environmental Protection Agency, Iowa Department of Natural Resources and Iowa Department of Agriculture and Land Stewardship water quality standards in accordance with the Clean Water Act and increased funding toward those efforts in Iowa. We do not support voluntary conservation compliance, but strongly request that subsides and supports be tied to conservation compliance measures and that payments not be made until compliance has been proven. Research and enforcement must be more aggressive in order to achieve necessary and immediate results.

Name Iowa Natural Heritage Foundation
City Des Moines
State Iowa

Providing comment on the following sections:

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

Iowa Natural Heritage Foundation

Comments on Iowa's Nutrient Strategy

January 4, 2013

We agree with the stated goal: "Iowa is a national and global leader in the production of food and renewable fuels, so a goal of this strategy is to make Iowa an equal national and global leader in addressing the environmental and conservation needs associated with food and renewable fuels production."
We endorse the concept: "The strategy harnesses the collective initiative and capacity of Iowa agricultural organizations, ag businesses and farmers towards implementation of nonpoint source management practices to improve Iowa water and soil quality." We encourage this focus because it may be far more cost effective, and provide more timely progress, than government driven regulatory or incentive programs.
While these quotations suggest agriculture may use this strategy to lead, the state agency actions and omissions to date do not warrant a passing grade for this state document as drafted. We believe the Environmental Protection Agency should give this work the grade of "INCOMPLETE"
We urge EPA to defer approval of this initial study, and to delay the granting of any leniency or forbearance for Clean Water Act implementation in Iowa, until state capacity and commitment to vastly accelerate the voluntary clean-up of polluted runoff in Iowa has been proven.
We recommend that DNR and IDALS voluntarily do (or that EPA require) the following actions before approval of Iowa's nutrient strategy is allowed to further delay clean water compliance requirements:

• The Water Resource Coordinating Council must further develop the plan it is assigned to implement, and several more agencies must seriously contribute to the implementation.
• Private sector entitles must publicly endorse and consent to their new roles and responsibilities described in the state strategy.
• The strategy must set higher nutrient reduction goals that acknowledge agriculture's pollution loads may have increased about 10%, because Iowa planted acres have increased by about 10% since the nutrient reduction goals were set in 2008.
• The strategy must define efforts to address the newly recognized high contributions of nutrient loads from in-channel stream bed and bank erosion, and flood scour erosion from cropped floodways.
• DNR and IDALS must fully utilize new LiDAR based conservation planning technologies, and also empower enhanced private sector services to use these technologies.
• The strategy must fix the striking inequity between farmer regulatory exemptions and urban requirements. Under the draft strategy, regulated municipal and industrial waste water treatment facilities would have average annual costs increase by $114 million dollars when local facilities must renew their discharge permits. On the other hand, farmers still get voluntary programs that help pay to address their nutrient pollution loads, and individual farmers can still opt to totally ignore their pollution impacts. The tool of nutrient trading is especially unfair because it enables farmers to sell as a service the cleaning up of their own or their neighbor's pollution to a regulated city and industry, whose costs are passed on to their residents and customers. Nutrient trading should be used sparingly because it is a regressive income transfer scheme of mandatory fees on essential city services to then pay farmers and farmland owners who volunteer to manage responsibly. The strategy should prescribe a high threshold of voluntary water protection as a prerequisite for farmers selling environmental services through nutrient trading.
There are two ways to achieve a more equitable state nutrient strategy:
1) Iowa should require broad farmer conservation participation, such as requiring soil conservation and nutrient management plans for all farms; and/or
2) Iowa should reallocate resources or raise taxes so farmers take greater responsibility for voluntary water clean-up, and less of the clean-up burden falls on waste water utilities.
Here are policy examples for more fairly spreading clean water expenses:
1. The ag land property tax credit is reformed to become a farm conservation income tax credit.
2. The various commodity check-off funds (corn, soybean, pork, beef, dairy and poultry) are required to make substantial investments in annual implementation of the state nutrient strategy.
3. The fertilizer tax that supports the Groundwater Protection Fund is substantially increased.
4. A sale tax is charged for drainage materials and installation services to help fund watershed programs.
5. The Corn Promotion Board is required to collect check-off funds from the sale/purchase of corn stover used in biofuels production, with the proceeds paying for additional conservation planning and technical assistance where biomass markets have developed.
6. The Iowa Financial Incentives Program at IDALS is entirely targeted to watershed projects.
7. The underground storage tank Environmental Protection Charge is authorized to be distributed through the Road Use Tax Fund for enhanced water management practices installed in road ditches and right of ways.
8. The sales tax is increased to fill the trust fund revenues authorized by 63% of Iowa voters in the 2010 Iowa Water and Land Legacy referendum.

We sincerely hope agriculture will lead the way with policies and programs for timely implementation of very specific nutrient strategies. Now is the right time for the farm lobby and conservation community to work together to put far more resources into Iowa's water protection efforts. The state nutrient strategy is INCOMPETE, and must be opposed by the conservation community so it cannot become stalling strategy. We believe private sector farm and conservation leaders should work together to define a policy agenda that really will make Iowa a national and global conservation leader.

Mark C. Ackelson,
President

Timestamp 1/4/2013 8:18 AM

Name Jeremy
City
State

Providing comment on the following sections:

☐ **Executive Summary**	☒ **Nonpoint Source**
☐ **Policy**	☐ **Point Source**

One of the suggestions in the assesment is to treat 70% of all streams with a filter strip. I work in the private lands field and have been trying to promote CRP filter strips. I have found that there is no way we will ever get close to even 50% buy in to filter strips. The profit margin for producers and cash rent are way to high compared to the payments CRP can offer. There has to be a change in the price of corn and beans or a way for Iowa to supplement CRP payments to ever get to 70% buy in.

Timestamp 1/4/2013 8:26 AM

Name Jim Pfeifer
City Waukee
State Iowa

Providing comment on the following sections:

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

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

Timestamp 1/4/2013 8:41 AM

Name Mark Dopp
City Washington
State District of Columbia

Providing comment on the following sections:

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

RE: Iowa Nutrient Reduction Strategy

Dear Secretary Northey and Director Gipp:

The American Meat Institute (AMI) is a national trade association. AMI members process 95 percent of all red meat products and 70 percent of all turkey products in the United States. AMI members own and operate several meat and turkey processing facilities in Iowa and are major contributors to the Iowa animal agriculture economy.

The AMI Environmental Committee commends the Iowa Department of Natural Resources (IDNR) and the Iowa Department of Agriculture and Land Stewardship (IDALS) for the development of the Iowa Nutrient Reduction Strategy (Strategy). The Strategy is a practical, cost efficient approach to effectively reduce the discharge of nitrogen and phosphorus into Iowa streams, thereby improving water quality in the State. This approach should also result in a significant reduction in the nutrient load in the Gulf of Mexico.

AMI supports the point source strategy of implementing technology based discharge limits on wastewater treatment facilities now and evaluating appropriate numeric water quality standards long term. This approach is more practical than the numeric in-stream water quality standards that have been implemented in other states. The Iowa point source nutrient reduction strategy will result in more immediate investment of resources in treatment facility improvements and, therefore, reduction in nutrient loads from wastewater treatment facilities. Moreover, time consuming and resource intensive legal and technical challenges regarding the reasonableness of numeric nutrient water quality standards should be avoided.

Some AMI members have already installed nitrogen removal processes at their Iowa wastewater treatment facilities. Those companies will now investigate phosphorus removal at their next NPDES permit renewal pursuant to the Strategy.

AMI also supports and applauds Iowa s efforts to define the impacts and costs of agricultural management and edge of field treatment practices. This information will be used by other Midwestern states and farmers as they develop similar strategies. It is vitally important that Iowa agriculture remain financially competitive with other states and nations in the meat protein markets. The nonpoint source strategy, including the assessment of nonpoint source management practices, provides a framework for developing economically efficient policies, and directing public funds and incentives to provide the greatest reduction in nutrient loads.

AMI looks forward to working with IDNR and IDALS as the Nutrient Reduction Strategy is implemented over the next several years.

Respectfully submitted,

Timestamp 1/4/2013 9:10 AM

Name Ross Berglund
City Randall
State Iowa

Providing comment on the following sections:

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

I believe Iowa's nutrient stategy will work to achieve the targeted load reductions through voluntary practices. As a local Certified Crop Advisor I've already been working with producers using cover crops to reduce runoff and reduce the amount of fertilizer needed. So far it is on a small scale but as we learn more the amount of cover crops should grow.

Timestamp 1/4/2013 9:27 AM

Name Scot Christiansen
City Edgewood
State Iowa

Providing comment on the following sections:

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

Where are the teeth? This is not a "Plan", it is a set of nice ideas. The non-point source part of the Plan basically says:

"We are doing great. We will try our best to improve."

Do you really think this Plan will meet the goals of non-point nutrient reduction? Or are you just 'going through the motions' in order to keep the EPA off of Iowa's back?

Forcing Iowa's farmers to change their practices in order to reduce nutrient runoff would be painful, but how can we meet meaningful goals without enforced regulations? I am impressed to see lots of scientific information in this document. But it looks to me as if the authors are afraid to upset the people responsible for most of the problem - farmers. Yes, we all rely on the economic activity of farming, but why can't farmers follow the same rules as everybody else? Factories, automobiles, and power plants are all important to us too, but we accept the idea that they need to submit to government regulation in order to promote the public good. Why should farmers be exempt?

If you seriously think that voluntary adoption of best practices will get the job done, then let's see you take this idea seriously. How soon will voluntary activities reduce nitrogen runoff by 5%? 15%? 41%? What is the plan if these goals are not being achieved? Without addressing these questions, I can't believe that this is a real Plan.

Does Iowa want to lead the world in finding ways to sustainably produce food and fuel? Then our Plan has to have some teeth.

Thank you for your attention.

Sincerely,

Scot Christiansen

34782 Littleport Road

Edgewood, IA 52042

Name James Patrick
City Storm Lake
State Iowa

Providing comment on the following sections:

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

I am the City Manager for the City of Storm Lake. I am concerned that the State is ready to accept this as the best solution and move on. I understand why since we do not want the EPA solution. It is true that IF the EPA signs off on this plan and implementation program that this would be less of a burden on cities. BUT the IDALS representative questioned if EPA can be tolerant and/or the environmental groups will not try to push the time lines. With that said, there is a lot that can be cleaned up in the overall plan.

I am concerned that the DNR and IDALS are trying to get this through under the State radar. This plan was kept secret for a long time and now the State is giving us a month to read it and comment back before January 4, 2013. This does not feel right nor does it give the public an opportunity to truly understand the magnitude of the problem and the fiscal impact it will have on the State, Cities, and agricultural interests. DOT did a better job hearing the public and explaining transportation funding last winter. I understand why DNR wants to keep this in rule making and not legislative, but legislators are already asking questions as to what gives DNR the right to impose this policy since they have not been informed nor do they understand. Why does this have to be done so quickly and quietly? I would be interested in the time line they are working on.

DNR/EPA needs to know the background (naturally occurring) phosphorus and nitrate that will be there regardless of city or agricultural efforts. This has been and will continue to be a problem. That needs to be factored into the potential solutions and target goals.

I am in full agreement that cities can do a better job treating wastewater, but what about a cost benefit analysis? Where is that point of diminishing returns? Storm Lake is undertaking a $10 million treatment plant upgrade and while we will be moving toward biological nutrient removal, more could have been planned if we would have known earlier or the time line was not so stringent. IDNR talked about treating to the ability of a city to pay if a city can t afford the 10/1 standard. I do not see that in the plan. It seems that if 80% of the phosphorus is from the stream banks (page 8 and 9 of the study), and is released in three events (IDALS presentation), that maybe there should be an effort to find a way to remedy that release to get more bang from the buck spent. Should the State control 35 feet either side of a stream or river and insure buffer strips are in place? Section 2.1 of the plan, page 2 under Phosphorus (last sentence on the page) states Edge of Field practices through buffers or sedimentation basin/ponds show potential for dramatic reductions in phosphorus, 58% and 85% respectively. Section 2.2 page 29 and 30 states that a 35 foot buffer on all crop land has the potential to reduce elemental P loading by 3,090 tons/year, which is about 18% of the overall phosphorus load reduction. Page 29 states that buffers would also reduce nitrate-N load from shallow ground water. I would suggest that the cost/benefit would be much better.

There is over $300 million available right now in the Mississippi River Basin initiative to incentivize farmers to use conservation methods to reduce nutrient loading. The problem is that farmers get more out of farming so many of them do not want to volunteer for conservation methods, in fact, they are plowing up buffer strips to put more of their land into production. This is compounded by the fact that there are many absentee land owners, many out of State, and the tenant is interested in making money not conserving soil. In the proposed Voluntary program being promoted, there is no accountability and no teeth. The IDALS presenter is right, it will be hard to herd 90,000 farmers and insure they are doing the right thing. To achieve 41% reduction from this voluntary program will not work (IDALS words). If it does not work, maybe something should change in the plan or maybe some of those funds could come to cities to upgrade the plants to remove 4% of the problem if agriculture can not do it. Page 11, Section 1.3 of the non-point study summarized that EPA is not targeting agriculture. Why, because it is to hard and easy to regulate permit holders?

As the DNR looks at new technologies for city POTWs, is there technology available to manage streams and rivers? The report speaks of bioreactors for nitrates. There is sand/iron filing filters to remove phosphorus that works at 80% efficiency for storm water. A portion of the $1.5 billion diverted from new treatment plants to install wetlands and new technology may be more beneficial. Please understand that I think cities should do a better job but state of the art technology to achieve small incremental improvements does not serve anyone and does not make a significant contribution to nutrient removal. This is the easy way out by applying pressure to permitted polluters and not adequately addressing the real problem. There needs to be meaningful change to agricultural practices beyond a voluntary program as well as improvements at city plants.

I am concerned about the cost to cities for new/upgraded BNR plants and then the added operational costs. In the case of Storm Lake, a BNR plant would help remove nitrates and phosphorus. Having had the best BNR plant in the country in Montana, I know that in winter the bugs need to be treated with care. With the high protein loading received by Hillshire, it is possible to significantly upset the plant. If a system is in compliance 99% of the time yet has one significant excursion, they could be in non-compliance for the better part of a year with the annual average limit or be forced to chemically treat at a very high cost/return. Is there an alternative to this? (DNR did not have an initial response to this).

Solids handling concerns me also. Since solids will increase with the use of alum or ferric polymers, the operational costs will also increase for solids handling. Will the DNR/IDALS change the land application regulations and rates to keep nutrient loading down so that we need to expand the area to be able to land apply solids? I would anticipate the need to expand the solids storage and handling capabilities which may not have been calculated in the annual operational budget.

This will limit the growth of cities since there is no head room. As cities expand, new technology will be required to stay within the permitted numbers.

Again, I think that this needs more thought and comment with more involvement from cites.

The following is an excerpt from MURKY WATERS: Farm Pollution Stalls Cleanup of Iowa Streams executive summary pages 6 and 7. If you would like a copy of the complete report, let me know and I will forward an electronic copy. Again, this is not to say that cities are off the hook, we have a role to play but if we are going to fix the nutrient loading it has to be a holistic approach and we are not there yet.

It Doesn t Have To Be This Way

Name James Patrick
City Storm Lake
State Iowa

Providing comment on the following sections:

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

Iowa s rivers and streams can be clean, but only if Iowans take concerted action to reduce the

nitrogen and phosphorus overload from agricultural operations. The good news is that experience and

science make it clear that concerted action does result in major improvements. Iowa s voluntary programs could work much better if they were revamped to be more effective and were provided with a larger and more secure source of funding. The governor and the legislature must act to implement the Iowa Land and Water Legacy amendment endorsed by 63 percent of Iowans in 2010. The state s citizens voted to tax themselves to provide funding to clean up their water. It is time for Iowa s politicians to follow through. The Department of Agriculture and Land Stewardship must revamp the way voluntary programs are implemented to increase accountability, target resources to the right places, monitor and report on the farming and conservation practices used by farmers and make use of highly trained professionals to advise producers and make programs work. Revamping the way conservation programs are implemented will produce better results more quickly. But even the most focused and best-managed voluntary programs will not be sufficient to solve the water quality problems associated with agricultural production if they remain entirely voluntary. More money will help, but even massive increases in funding will not overcome the inherent weaknesses of relying solely on voluntary action.

It is time to face facts decades of working only with farmers who volunteer to reduce their polluted

runoff has not achieved any overall improvement in Iowa s streams and rivers. This report shows that

40 years of the voluntary approach have failed to improve nitrogen and phosphorus pollution. EWG s

2011 report, Losing Ground, similarly showed that 80 years of the voluntary approach had failed to

adequately reduce pollution from sediment flowing off farm fields. The state must put in place smart and narrowly targeted regulations that curb poor farming practices. Regulations should phase out particularly risky practices such as planting crops right up to stream banks or allowing livestock unmanaged access to streams. Landowners and managers should be expected to control the ephemeral gully erosion that creates a direct pipeline for mud, fertilizer and manure flowing into streams and rivers. Many, if not most, farmers would agree that these activities are simply bad business practice and bad for agriculture s brand.

Since the boom in corn and soybean prices, simply driving across Iowa provides compelling evidence

that voluntary programs must be buttressed with smart regulation to ensure that proper conservation

practices don t lapse. Conservation will have to become far more durable for there to be any hope of

cleaning up Iowa s streams and rivers.

Such regulations would establish a basic standard of care that comes along with the rights of land

ownership. Voluntary programs can then be used to support those landowners and managers who meet

these basic standards and want to do still more to clean up Iowa s rivers and streams. Precisely targeted regulation coupled with a strengthened voluntary program would set Iowa on a path toward cleaner water for our children and ourselves.

Timestamp 1/4/2013 9:59 AM

Name Byron Gutshall
City Booneville
State Iowa

Providing comment on the following sections:

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

I support the state nutrient strategy and have demonstrated voluntary practices will work. Iowa agriculture can lead the nation in production of food and renewable energy and set the standard for addressing environmental and conservation reform.

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

I also believe continuing to impelement grid sampling the soil and using variable rate technology. This allows to put back the appropiate amount of nutrients for optimal crop uptake and growth by placing the right amount of nutrients in the right areas.

I support the nutrient reduction strategy.

Timestamp 1/4/2013 10:04 AM

Name Victor Miller
City Oelwein
State Iowa

Providing comment on the following sections:

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

The summary does a nice job of presenting what is happening and the pro-active stance that Iowa is taking, the other sections get a great deal more detailed and in many respects without the summary would be unintelligible. I am fully supportive of the approach presented in the document as long as everyone concerned continues to let sound, non-emotional science guide the decision and implementation process. Much has been done by production agriculture ie filter strips, cover crops,grass waterway establishment, etc. to control runoff. Many of these practices have been done at the expense of the landowner. I would only caution everyone to not view this willingness to reach a solution by producers as an admission of guilt and therefore all of the costs should fall upon them. We need to have continued fact based scientific research in this area both to assess the methodology of implementation as well as monitoring issues to see if we have addressed the problem. One of the best aspects of this effort is the cooperation between the EPA, DNR, IDALS, the Governor and all of the stakeholders. We must continue in this vein to have a successful outcome. We all want a solution, we all have to live here and those of us who derive our living from the land most especially want sustainable practices, and a healthy environment in which to operate.

Timestamp 1/4/2013 10:50 AM

Name Leland Groves
City Newton
State Iowa

Providing comment on the following sections:

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

DNR has become a joke under Branstad, who I voted for. Voluntary compliance will never work, some will use it, some won't. Drive down the road and look at all the waterway clearing that is taking place, tiling direct to creeks and rivers. Will this impact nutrients flow in a positive or negative manner. Future generations deserve something better.

Name Sarah Fox
City Loveland
State Colorado

Providing comment on the following sections:

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

The following comments are directed at Section 2 (specifically sections 2.1 and 2.2) of the Iowa Nutrient Reduction Strategy titled Nonpoint Source Nutrient Reduction Science Assessment. Within this document, three main strategies were discussed to reduce nitrate loss from agricultural fields, and were basic nitrogen management, land use, and edge-of-field practices. Nitrogen management practices were further categorized into practices that focused on the efficient use of nitrogen, which included application timing, source, application rate, inclusion of a nitrification inhibitor, cover crops, and living mulch.

Enhanced efficiency fertilizers (EEFs) are products designed to increase nutrient availability and plant nutrient uptake while decreasing losses to the environment compared with a reference soluble fertilizer. Nitrification inhibitors are one type of enhanced efficiency fertilizers, but were the only EEFs included in this publication. Other sources considered EEFs in addition to nitrification inhibitors include: slow release fertilizers, controlled release fertilizers, and urease inhibitors. On page 5 in the nitrification inhibitor section, it is stated that Due to limited data with use of nitrapyrin with other nitrogen fertilizers, or other products that slow nitrification, these were not included in this practice. While this may be true, there has been a large amount of yield data along with some environmental data collected using other EEFs that should be considered.

One such product that protects against all three N loss mechanisms is ESN by Agrium Advanced Technologies. ESN is a polymer coated urea product, and is considered a controlled release fertilizer. The polymer membrane allows water to diffuse into the granule, dissolving the nitrogen inside, becoming a water and urea solution. Moisture and temperature the same growing conditions that favor plant growth and nutrient demand release nitrogen from the polymer coating. Moisture creates the nitrogen solution inside the coating, which moves through the coating at a predictable rate, based on soil temperature.

Currently, a number of states have included ESN either into their recommended Best Management Practices, or are actively promoting its use as a better option to their standard practices. For example, the Minnesota Department of Agriculture has included the use of ESN throughout most of the state in their BMPs for Nitrogen Fertilizer Use in Minnesota publication (available at: http://www.mda.state.mn.us/protecting/bmps/nitrogenbmps.aspx). The use of ESN, either in the late fall or spring preplant, is an acceptable BMP right along with the use of fall anhydrous with nitrapyrin. Many of the areas in southwestern and south-central Minnesota are very similar to areas in northwestern and north-central Iowa, making this recommendation perfect for those areas.

Based on the literature review done for this report, including a nitrification inhibitor, specifically nitrapyrin, with fall applied anhydrous ammonia showed an average yield increase of 7% as compared to fall anhydrous ammonia alone. Furthermore, the average nitrate-N reduction including nitrapyrin was 9%. While these results may not seem very drastic, they are only looking at one application timing using one EEF. As was stated in this publication, benefits of anhydrous ammonia with nitrapyrin are limited to fall applications. However, ESN can be applied in the fall (where fall applications of anhydrous ammonia or urea are allowed), spring preplant, or as a side/top-dress application. Large yield benefits have occurred using ESN at any of these times. For example, work done by Dr. Jerry Hatfield with USDA-ARS in Ames, IA, compared spring applied ESN to spring applied ESN from 2008 to 2010. In dry years, such as 2009, there was not a yield difference between ESN and anhydrous ammonia because very little N loss occurred. However, in wet years such as 2008 and 2010, the yield increase of using spring applied ESN over spring applied anhydrous ammonia was 27% and 17%, respectively. Other work done in Iowa by Dr. Randy Killorn (formerly with Iowa State University in Ames, IA) shows that ESN, applied either in the fall or spring, has a greater advantage over ammonia. A study conducted from 2006 to 2007 in Ames and Kanawha showed that ESN applied in the fall and spring increased yield 25 bu/ac and and 5 bu/ac, respectively, over ammonia.

Additional research in states surrounding Iowa Missouri, Nebraska, Illinois, and Wisconsin - has shown that, when conditions conducive to N loss exist, ESN has a substantial advantage over conventional fertilizers. In some cases, it has even outperformed side-dress applications of conventional fertilizers, the recognized best management practice.

Enhanced efficiency fertilizers are one tool that farmers can utilize to help increase their nutrient use efficiencies. Using EEFs, especially ESN, farmers have the ability to increase yields, lower N rates, and increase nutrient use efficiencies, which can decrease the potential for nutrient losses to the environment. We encourage you to consider enhanced efficiency fertilizers in addition to nitrapyrin in the Iowa Nutrient Reduction Strategy. As with any best management practice, EEFs must be used within the framework of a 4R Nutrient Management System (right source applied at the right rate, right time, and in the right place) in order to achieve the desired results.

Timestamp 1/4/2013 11:01 AM

Name Joel Nelson
City Carroll
State Iowa

Providing comment on the following sections:

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

The proposed stategy makes sense for Iowa farmers and people of the Great State of Iowa. I support the voluntary approach and believe most producers will make the correct decisions that will support a healthy environment. The State of Iowa has tremendous resources in Certified Crop Advisors. These professionals can be utilized to promote farming pratices that reduce fertilizer loads in streams and ponds. Through CCA's and cooperating producers we can deliver not only the most reliable and safe food supply in the world but also clean water! Do you really feel the "government" can manage this problem??? Think about that!

Timestamp 1/4/2013 11:03 AM

Name Brian Lenz
City Onawa
State Iowa

Providing comment on the following sections:

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

In reference to the nutrient management practice and TDLM. It is good to remember that as agriculture has been and will continue to be very proactive in being good land stewards. Over the last decade the amount of grain raised per unit of fertilizer has continued to decline. This reduction has been due to better farm management, better fertilization practices, and improved plant genetics. While at the same time continuing to feed and clothe the worlds hungry. I am not prepared or willing to trade off the peace and security of the world for any perceived benefit that a mandated system would create.

Timestamp 1/4/2013 12:45 PM

Name Jon Maakestad
City Radcliffe
State Iowa

Providing comment on the following sections:

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

I support the state nutrient strategy and have demonstrated voluntary practices will work. I plan to help producers and farmers increase their voluntary efforts, and to help improve the effectiveness of current programs. I believe Iowa's nutrient strategy will work to achieve the targeted load reductions thorough voluntary practices that allow farmers freedom to develop solutions that fit their individual farms. I believe iowa agriculture can lead the nation in production of food and renewable energy, help feed the world's growing population, and set the standard for addressing environmental and conservation practices.

Timestamp 1/4/2013 1:40 PM

Name charles vigdal
City spirit lake
State Iowa

Providing comment on the following sections:

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

Hello,

I am commenting because the health of the land and water in Iowa is very important to me. There are a couple things I'm concerned about. First, a lot of the solutions to these water quality problems are mostly voluntary. That is not enough. We have been operating that way for some time now. Things haven't improved much. Cleaning up the water and protecting our soil quality is GOOD FOR BUSINESS. This strategy needs more teeth if anything is going to change. Next, I don't believe that there is "non-point" source pollution anymore. If you have well planned water quality testing sites and access to watershed management information you can see exactly where the source is coming from. Please turn this dream of clean water in Iowa a reality and keep the science, ditch the politics.

Timestamp 1/4/2013 2:08 PM

Name Adam K. Wilke
City
State

Providing comment on the following sections:

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

Agricultural subsidies and other monetary supports need to be tied to conservation compliance. Further, conservation compliance should not be voluntary--in the case of any federal, state, or local support--it needs to be mandatory. Compliance should also be stringently and adequately enforced. We as taxpayers demand not only inexpensive food stuffs, but also swim-able and fish-able waters for future generations. The Nutrient Reduction Strategy needs to provide a proper balance between production goals and economic incentives of private parties, and environmental health and other ecosystem services for public well-being.

Name Linda Kinman
City Des Moines
State Iowa

Providing comment on the following sections:

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

January 4, 2013

John Lawrence
Iowa State Univeristy
132 Curtiss
Ames, IA 50011

Dean Lemke
Iowa Department of Agriculture and Land Stewardship
Wallace Building
502 E. 9th Street
Des Moines, Iowa 50319

Adam Schnieders
Iowa Department of Natural Resources
Wallace Building
502 E. 9th Street
Des Moines, Iowa 50319

RE: Nutrient Reduction Strategy Comments

Des Moines Water Works (DMWW) strongly supports a nutrient reduction plan for Iowa waters.The Nutrient Reduction Strategy has brought to light numeric values for nitrate and phosphorus contributions and necessary reduction levels by point sources and non-point sources. These values are based on Iowa State University's extensive research and literature review. This is the first time this comprehensive information has been brought to light. The strategy however:

• does not establish a numeric nutrient standard, The Nancy Stoner "Framework Memo," #8 states, "Develop work plan and schedule for numeric criteria (water quality standards) development"

• is void of any level of regulation for non-point source contributors

• lacks vision – (such as land use changes) – it is a reflection of where we are today with nothing new or innovative

• provides a lot of suggestions, but no specific action plans

• does not identify measurable outcomes – how is success or failure defined and measured

• lacks urgency, no timelines or goals have been articulated

• is not part of a comprehensive state water plan

The public has greatly benefited from the regulatory requirements of the point source community. Four decades later water policy needs to establish regulatory requirements for the non-point source community. Requirements that set standards to be met, options for meeting the standards, tools for determining compliance and the cost of non-compliance.

DMWW is a public drinking water utility owned by the citizens of Des Moines and governed by a Board of Trustees. Des Moines citizens have entrusted the utility with the protection of their infrastructure and to diligently operate the utility in a manner that provides safe drinking water to approximately 500,000 people in Central Iowa.

Primary water sources for DMWW are the Raccoon and Des Moines Rivers and the infiltration gallery that runs adjacent to the Raccoon River. Land use in the Raccoon and Des Moines River Watersheds is overwhelmingly agricultural. About 1.7 million of the 2.3 million acres in the Raccoon River watershed are cultivated for corn and soybeans. Much of the corn-soybean system requires constructed drainage (agricultural tile drainage) to maximize yields. Application of manure and commercial fertilizers are transported in run-off events and through tile drainage. All of these factors have resulted in various consequences for water quality.

Contaminants of concern for DMWW are nutrients, bacteria, algae blooms, cyanobacteria, and disinfection by-products, the bulk of which are a result of non-point source nutrients in the source waters. Nutrients in water are necessary for healthy watersheds. But in high concentrations they can adversely affect aquatic life and human health. For a drinking water utility, increasing nutrient loads cause difficult and costly challenges at the source, in the treatment process, and at the tap.

It is not our intent to tell people how to farm or what they can and cannot do on their land. But it is our intent, to rigorously advocate for establishing a comprehensive nutrient reduction plan by first setting numeric standards to aggressively reduce non-point source nutrient contributions in Iowa's surface and groundwater resources. In a 2007 report by the Center for Agricultural and Rural Development (CARD) and Department of Economics, Iowa State University, Conservation Practices in Iowa: Historical Investments, Water Quality, and Gaps, it states, "Water quality indicators we (CARD) focused on in this study are nitrogen and phosphorus. …In the model outputs, stream flow was estimated to increase in all watersheds, indicating that the existing conservation practices allow faster movement of water." When 80-90% of land use in the watershed is agricultural, these findings raise concerns regarding placement and effectiveness of current conservation practices. And, it only makes sense that to improve water quality in a watershed your emphasis has to be where it will be the most effective and maximize the prudent use of tax payer money.

Also in the 2007 CARD report, Conservation Practices in Iowa: Historical Investments, Water Quality, and Gaps, "We (CARD) estimated that

Name Linda Kinman
City Des Moines
State Iowa

Providing comment on the following sections:

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

the statewide cumulative annual cost was about $435 million for 7 major conservation practices on the ground and accounted for part of 1997 -2004 data sets." (The breakdown of cost figures by conservation practice is expressed in Table 3.) In other words, at least $435 million dollars of taxpayer money has been spent annually over the last 15-20 years for voluntary implementation of conservation practices to protect Iowa's water and soil resources. The measurable outcome of those conservation programs is that according to the Environmental Working Group report, Losing Ground, more than 50% of Iowa's top soil has left Iowa. DMWW water monitoring results exhibit water quality continues to trend downward. Voluntary, incentive based practices have not worked for the past 30-40 years. The Nutrient Reduction Strategy (Strategy) brings nothing new or innovative to generate change. DMWW is extremely disappointed that the Strategy does not even mention regulation as a possibility for today or in the future.

Monitoring trends in the Des Moines and Raccoon River since 1974 show the increasing trend of nitrate-nitrogen loading and concentrations. (Graphs will be e-mailed with written comments)

All waters in Iowa are "public waters and public wealth" of its citizens and is for the beneficial use of all citizens. It is the policy of the State of Iowa to protect existing water uses and to protect and maintain the existing physical, biological and chemical integrity of all waters of the state. The past piece meal approach to nutrient management will not effectively decrease non-point source nutrient contributions in Iowa's surface and groundwater resources. To generate the necessary change that improves water quality the state needs bold strategies that can be implemented immediately. These strategies need to have defined goals (numeric standards) and measurable outcomes.

The Nutrient Reduction Strategy should include:

Numeric Nutrient Standard –

DMWW can concur with the scientific findings that one standard does not fit across the state. Soils, weather patterns, farming practices, and monitoring data all vary. However, the Gulf Hypoxia Action Plan includes a numeric standard and the proposed Nutrient Reduction Strategy also sets numeric standards.

All point source entities are required to meet the same statewide numeric standards. Wastewater discharges can vary from one city to another (i.e. Cedar Rapids versus Iowa City) yet each must meet the same prescribed discharge standard. Nowhere does the standard prescribe approaches for meeting the standard. But, based on individual variances (wastewater characteristics, volume, receiving stream, etc.) the wastewater utility selects the type, size, and number of treatment processes that will allow them to meet their discharge standard (limit). Therefore,it does not preclude the state's ability to set a statewide numeric standard or multiple numeric standards each at a smaller scale, such as HUC (Hydrologic Unit Code) 8 or 12. Either way, a numeric standard can and should be set to meet the goals of the Gulf Hypoxia Action Plan and the proposed Nutrient Reduction Strategy.

Monitoring may not be available for every stream in Iowa, but many including the Raccoon and Des Moines Rivers have been monitored extensively. Numeric standards can be set and while work begins in one watershed, monitoring can be focused on streams where additional data is needed.

• The Gulf Hypoxia Action Plan set a numeric standard of 45% nutrient reduction of riverine nitrate and phosphorus load.

• The proposed Strategy sets numeric standards for nitrates at 41% reduction from non-point sources and 4% from point sources. The numeric standard for phosphorus reduction is 29% from non-point sources and 16% from point sources.

• Through data analysis the state can set numeric standards statewide or by HUC 8 and/or 12 watersheds. This will force point and non-point sources to work together toward an identified goal (the nutrient reduction standard), prioritize watershed needs most critical to reach the goal, opens up the opportunity to work in partnership for nutrient trading within the watershed, and is a prudent use of taxpayer money.

• Integrated solutions on a watershed scale, and involvement of all stakeholders in the decision making is critical. Producers, wastewater and storm water entities are making isolated decisions, even when those decisions are having consequences that impact others.

o All crop insurance, conservation and funding programs administered by the state should require a total system approach to planning, prioritizing and implementation of practices on farms to integrate with watershed planning and not end at the edge of a field.

o All installation of agricultural tile drainage systems and drainage district upgrades and maintenance should be incorporated into a total watershed system approach including planning, prioritizing, mapping and implementation.

o Waste water and storm water entities should require a total system approach to planning, prioritizing and implementation of treatment technology and other infrastructure that is integrated with watershed planning and not end at the city limits.

It is difficult for the average individual to see how these drainage systems differ. Are they different? No,they both manage water. (Drainage system pictures will be e-mailed with written comments)

Wastewater Treatment Plant Discharge -----Agricultural Tile Drainage
Point source.....Non-point source
Regulated.....Non-regulated
Location is mapped.....Location is not mapped
Treated discharge.....Non-treated discharge
Permitted with discharge limits.....Non-permitted with no discharge limits
Potential contaminants discharged.....Potential contaminants discharged
Are the same for both - nitrates, phosphorus, microbial, and pharmaceuticals

Integrated solutions on a watershed scale, and involvement of all stakeholders in decision making is critical to meet prescribed standards. It is

Name Linda Kinman
City Des Moines
State Iowa

Providing comment on the following sections:

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

common knowledge that successful watershed projects are locally driven. By providing a nutrient standard to a watershed community it identifies the end result needed, and allows local decisions on how it can be achieved. This process needs to bring a sense of community and stewardship back into the demeanor of every landowner – urban or rural.

Compliance and Enforcement –

Compliance and enforcement maximize results. An effective compliance and enforcement process ensures fair, consistent, timely, and expected enforcement of laws and regulations and applies them to everyone equally. Environmental laws are the foundation for protecting public health.

• A nutrient reduction plan must include legal requirements to be met by all entities equally. Rules and regulations are only the first step, but they are the foundation for protecting public health.

• Compliance is step two. Without compliance, rules and regulations will not achieve the desired results. Compliance compels the majority to change behavior.

Compliance and enforcement affirmatively promotes compliance and identifies and imposes legal consequences on the minority who voluntarily choose not to comply. In any regulatory situation some people will comply voluntarily, some will not comply, and some will comply only if they see that others are penalized for noncompliance. Many people ask, “Would community and industrial waste discharges be protective of human health if it had not been for the Cuyahoga River fire in 1969 and the regulations that followed?” Would voluntary, incentive based initiatives have brought the Cuyahoga River or any other water body back to life? The general consensus is no.

Point Sources are required to comply with permit limits. Non-point Sources are not required to comply with anything – implementation is all voluntary. This is not a level playing field. By taking a watershed approach both entities should expect some penalty if the watershed nutrient standard is not achieved. An example is that point sources might receive a notice of violation and be fined by a pre-determined amount set in rules. A non-point source example is that they receive a notice of violation and lose all or some portion of their agriculture land tax credit which again would be pre-determined in rules. Fines and forfeited taxes would be placed in an account dedicated to watershed improvement projects and awarded through a competitive grant application process.

To reduce nutrients (both commercial fertilizer and animal waste), the state must measure what is being applied and where. It was stated at the public meeting presenting the Strategy in Ames, December 19, 2012 that producer’s identities must be protected. However, there were comments that it is possible that the amount of fertilizer and manure applied could be reported by watershed. A Nutrient Management Plan could be developed by watershed and should require:

• Mapping of all commercial fertilizer and manure applications by watershed.

• Identification of nutrient loads (commercial fertilizer and manure) the watershed can support and still meet the nutrient reduction standard.

• Assume all land has generous amounts of phosphorus and the only time it can be applied is when soil tests determine a phosphorus deficiency. The Strategy states, “The soil test levels being maintained often exceed those recommended by Iowa State University, which explains the high proportion of soils testing high and very high in the state as suggested by soil test summaries (Mallarino et al).”

Funding –

Funding for point source technology is limited to rate payers, State Revolving Loan Funds (which must be paid back), and limited grants from USDA-Rural Development. Non-point sources have multiple cost-share programs (EQIP, CRP, etc.), and producer funding. Additional new money must be secured to assist both municipalities with infrastructure needs and increased cost share for agriculture. If not, the state will remain at status quo.

Market driven approaches are attractive, but non-point to point sources has not been overly successful when tried in other states across the country, while point source to point source has had some success. How will Iowa’s approach be different to generate success?

Other –

Agencies should prepare annual reports of nutrient reduction progress by watershed. Results should be measurable and meaningful and available to the public.

Social scientists should be engaged to determine why conservation practices are not implemented across the landscape.

Market the long-term value of conservation practices, to water, soils and producer income. (What are the influences – absentee landlords, amount of rental land, increased prices of crops, etc.?)

The proposed Strategy lacks credibility due to the dramatic differences between compliance by regulatory means versus voluntary approaches.

We strongly encourage support for development of a comprehensive nutrient reduction plan including numeric standards. Standards that protect Iowa’s water resources, promote economic development, and enhance the quality of life necessary to attract workers and jobs to Iowa. To truly go down the road together, both point sources and non-point sources have to be on a level playing field that emphasizes responsibility and accountability. We need to find ways to manage nutrients effectively, efficiently, economically and fairly.

Name Linda Kinman
City Des Moines
State Iowa

Providing comment on the following sections:

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

Sincerely,

Linda Kinman
Public Policy Analyst/Watershed Advocate
Des Moines Water Works
2201 George Flagg Parkway
Des Moines, IA 50319

CC: Chuck Gipp, Director, Iowa Department of Natural Resources
Bill Northey, Secretary of Agriculture, Iowa Depart. of Agriculture and Land Stewardship
Karl Brooks, Administrator, U.S. Environmental Protection Agency
Thomas Vilsack, Secretary of Agriculture, U.S. Department of Agriculture

Timestamp 1/4/2013 2:37 PM

Name Dan Rickels
City
State Iowa

Providing comment on the following sections:

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

I think this is the best way yet to accomplish our goal with this voluntary approach with real science figures and results without finger pointing and needless money spent! I am glad we are working on this together with all departments as well as farmers etc!

Timestamp 1/4/2013 3:03 PM

Name John H. Wills
City Spirit Lake
State Iowa

Providing comment on the following sections:

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

All-in-all, no real surprises here. This really seems to be the same thing repackaged. Is there a way that we can incorporate more specific game plans? Right now, as it stands what are we to shoot for? Some cover crops and conservation tillage? There are no acres required... just suggestions.

To get real, perhaps we could specify, for example, in zone 103 (Des Moines Lobe of the Wisconsin Glacier) that 45 percent be seeded to cover crops each year and all conventional tillage be converted to conservation tillage plus all conservation tillage be converted to a no-till system. Those are firm "goals" for us to hang our hat. Then we can break it down even further to counties or even townships. Give us a goal to shoot for as small units of government. Right now it just shows us some suggestions as to what can be done. No goals, no money to back it up, no effort to achieve anything.

Without these goals everyone will point fingers at everyone else saying they should do it. I work for the Dickinson Soil and Water Conservation District and if my District knew that it was responsible for coming up with 4,500 acres of cover crops this next crop season, we would work for that. With this plan the way it is, all we know is that we should shoot for cover crops, conservation tillage, streamside buffers, and wetlands (among other things).

I like the ability to be flexible but my suggestion is this...don't give us a goal of a number of acres of buffer strips...instead give an SWCD a goal of reducing X number of lbs of phosphorus and X number of lbs of Nitrogen. Do this for every county. Or we could even give a goal to each HUC 12 watershed for a specific amount of a pollutant to be reduced. Let them figure it out, if they choose.

Voluntary is ok, but how do we succeed if we don't have a goal? Let small government bodies set the program based on what is an acceptable practice in their county. Let them set up programs that work for them. If they succeed that is great. If they don't succeed give them help...or take it away from them until they prove they can succeed.

That is my suggestion for now. After much thought, I really think this plan can succeed but it needs to have some changes made and specified and localized reductions brought to the local level for that to happen. It won't happen on its own by some miracle. It will take someone to go out and educate and □ sell these things to the landowners.

Name Keith Dexter
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I sincerely believe that using science to target the best approaches in the most practical areas makes the most sense when compared to one size fits all regulation from the federal government.

Nutrient Reduction strategies, implemented locally and voluntarily on the most vulnerable land and watersheds have been proven to work in the past in different areas across the state. Coordinating efforts statewide, while measuring progress and reporting to the public seems like the most reasonable way forward.

I believe that Iowa farmers, when presented a practical plan that makes scientific sense while still allowing for viable agricultural production will voluntarily choose the right path 95% of the time.

To emphasize, I believe the key to voluntary implementation is statewide local coordination. If someone local comes to me because I am in x watershed in x soil type using x farming method and explains that using y farming method will drastically reduce nutrient entry into our streams and the Gulf of Mexico, I am likely to implement a plan, working with this local expert. I am likely going to keep my food production levels high as well.

If a federal agent from the EPA comes to my farm and forces me to implement some plan that was developed in Washington DC by an expert who grew up in a different state and doesn t understand modern production practices, it is likely that food output from my farm will fall, along with the value of my land. It is also very questionable that the practice mandated by an un-accountable federal agency will reduce nutrients either. Keeping the power to reduce nutrients with the individual and the local expert will have better results every time.

On my farm, the most important practice I have implemented has been using a finishing disk that would be considered a secondary tillage tool in place of more aggressive tillage practices in the fall on highly erodible land. This practice levels stalks while sizing residue and shows a little bit of black soil on the surface allowing for much faster warm-up in the spring. The key is to not tear out the root-balls of the previous year's crop. This does an excellent job of keeping soil in place.

Many years, no tillage pass is needed in the spring, even when growing second year corn.

I have also been spreading dry phosphorus and potassium with variable rate technology for many years. Within the next five years, I plan on implementing technology that allows for variable nitrogen application during side-dressing. This puts more nitrogen where it is needed, closer to the point of crop utilization, while allowing me to save money by reducing application rates where the marginal cost exceeds my marginal return.

The key to making this strategy work is to keep the strategy voluntary, allowing for local innovation, while utilizing the state of Iowa s ability to coordinate and educate. Keith Dexter

Timestamp 1/4/2013 3:44 PM

Name Daniel Rickels
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Thank You for helping with this nutrient reducing strategy. What a great way with all departments working together instead of spending money and POINTING FINGERS! Everything has a cost, of which I don't think is part of EPA's agenda. We would like to hold an informational meeting here in Jones County to help inform more farmers about this voluntary approach, of which we are working on. I've built terraces and put in waterways [even though the field is non highly erodible] just because I know it helps with erosion etc. I've also counter farmed more than the last owner just because I know it is better for all. Daniel Rickels

Timestamp 1/4/2013 4:07 PM

Name Carole Simmons
City Fairfield
State Iowa

Providing comment on the following sections:

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

The Nutrient Reduction Strategy fails to adequately address the scope of the problem. To quote the Des Moines Register, the "public was shut out from preparation of the plan, but ag interests weren't." If voluntary measures were adequate to deal with non-point-source pollution, we would have seen progress by now in cleaning up Iowa's waterways. Instead, things are growing worse, and the Dead Zone in the Gulf is growing.

I wholeheartedly agree with Richard Doak: "Iowa cannot muster the political will to clean up some of the nation's most polluted waters. This business-as-usual attitude shows that state leaders have no long-term vision for our future."

Perhaps it will take the EPA stepping in to see that adequate protections for our waters are enforced.

Timestamp 1/4/2013 5:08 PM

Name Andrew Jenkins
City West Branch
State Iowa

Providing comment on the following sections:

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

I don't have time to pick this apart right now, but disproportionately relying on point source reductions to offset the non-point source contribution is poor policy. It's great the PS can be reduced by 66% and 75% through technological advances, but let's see some real effort to have the largest contributors do their part too.

Timestamp 1/4/2013 5:47 PM

Name John Paule
City Prole
State Iowa

Providing comment on the following sections:

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

In the Nutrient Strategy much is said about innovative approaches and technology. I expect this is similar to other plans that have been previously developed to reduce nutrient and sediment moving into Iowa s streams, rivers, and lakes. However if Iowa is going to get serious about reducing the runoff of nutrients and sediment from agricultural land, then Iowa and Federal Conservation Agencies need to get serious about using available technology. Use of technology can result in efficiencies while improving overall quality without the need to add agency staff.

In the past few months I have been working with private and public entities including the US Fish & Wildlife Service (FWS) to restore a wetland on my property. All entities, especially The Fish & Wildlife Service, have been extremely helpful and eager to participate in the project. FWS has been to my farm several times to gather survey data that has been used in the development of a mutually agreeable option for such a project.

About three weeks ago I was introduced to software developed by a small company, Agren, based in Carroll, Iowa. After being introduced to the software, I mentioned to Stan Buman, Vice President at Agren, that I was working with several entities including FWS to develop a wetland on my property. Stan offered to set up an online meeting and show me how he could develop different options using their WetlandBuilder software. Even though I had been working with the other entities for several months I was very interested in Agren s technology. Stan set up an online meeting. In just a few minutes, he identified my farm and where I wanted a wetland restored. In another 15 minutes he provided me with the first option for a wetland. It gave me a great pictorial view of what FWS had proposed. In the course of about 30 minutes Stan provided me with several more options and enhancements using this software technology. I was impressed with the report produced including schematics and aerial photographs, charts and graphs detailing the entire project including estimated costs based on market data. Far more information than I had received to that point from any of the other project partner entities. In addition, we were able to edit certain information specific to known costs and implementation decisions online and tailor the report.

After creating the wetland option and report, Stan asked me if I had any interests in other conservation practices. I indicated I was interested in cleaning out an existing pond and making it bigger. Again in just 15 or 20 minutes Stan was able to provide me with several options. And after the pond, Stan provided me with a plan for a Water & Sediment Control Basin to stop a gully from cutting back into my neighbor s field as watershed from from the neighbor s field was being used to support the larger pond size in the plan.

Within 90 minutes Stan gave me several high quality estimates for a wetland, a pond, and a water & sediment control basin. In addition to the project overview and estimates, he provided me with an aerial photo of how the structures and pool areas would look on my farm.

This would be a great tool in the hands of a public entity like the Fish & Wildlife Service. After seeing the Agren software used on my farm, it is beyond me why every conservation office in Iowa does not have access to this very affordable technology. If Iowa is going to meet water quality objectives, this software tool is a proven, easy-to-use technology designed to improve government agency effectiveness and efficiency, reduce costs, speed execution, and improve quality . In a financial environment where dollars for additional staff to support land and farm owners are stressed, use of this technology could really help out.

If Iowa is going to get serious about reducing the nutrients and sediment in Iowa s surface waters we need to get serious about working with companies like Agren to develop even more software programs to help landowners.

Timestamp 1/4/2013 5:47 PM

Name John Paule
City Prole
State Iowa

Providing comment on the following sections:

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

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If Iowa is going to get serious about reducing the nutrients and sediment in Iowa s surface waters we need to get serious about working with companies like Agren to develop even more software programs to help landowners.

Timestamp 1/4/2013 9:01 PM

Name Nick Roethler
City
State

Providing comment on the following sections:

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

This strategy or plan is a good start and a further step towards achieving a reduction in nutrients. It also brings to light that this process will not be easy, but it can be done with a variety of methods. With that being said Iowans should get together, support this plan and use it as a place to move forward and work towards cleaner water, reduced nutruent transport, and environmental benefits that this strategy proves can be achieved.

Timestamp 1/4/2013 10:17 PM

Name Jon Rosengren
City Algona
State Iowa

Providing comment on the following sections:

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

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Timestamp 1/5/2013 7:19 AM

Name Jay Gunderson
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

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

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

Timestamp 1/5/2013 7:28 AM

Name Barbara Beaumont
City North Liberty
State Iowa

Providing comment on the following sections:

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

The Strategy has been criticized as being lop-sided in allocating resources and effort in proportion to the problem areas. Municipal and urban sources of pollution, which are estimated to contribute 12% of the phosphorus and 9% of the nitrogen in the water, are given strict prescriptions. Conversely, agriculture, which is estimated to contribute 70% of phosphorus and nitrogen loading, is left to be mitigated by voluntary efforts of farmers and absent of regulation.

SINCE AGRICULTURE IS THE MAIN CONTRIBUTOR TO POLLUTION, WHY IS IT NOT SUBJECT TO REGULATION?

Timestamp 1/5/2013 10:53 PM

Name Randy Caviness
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

On my 4,000 acre farm we use GPS 2 1/2 acre grids for nutrient managment, i have installed over 4 miles of terraces, several of which i paid for on my own with out cost share, We use no-tlll on all of our crop acres and have for over 20 years, many of our soil samples show greater then 5 % organtic matter that hasbeen built up over the last 20 years from under 3 % in the 1980's.
Organic matter helps retain soild nutrentents and promotes water infiltration during heavy rains. Along with better root development promoting better crops
We use contour buffer and filter strips along creeks and side hills along with grassed water ways.
I had a demonstration plot on my farm along with the Iowa learning Farm at ISU to deminstrate no till and other conservation practices.
I beleive Farmers are best suited to make the right choices on there own farms when it comes to soil and water issues. Randy Caviness

Timestamp 1/6/2013 9:58 AM

Name Tom Hauschel
City Urbandale
State Iowa

Providing comment on the following sections:

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

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

Timestamp 1/6/2013 11:26 AM

Name Lyle Stacy
City Brighton
State Iowa

Providing comment on the following sections:

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

Agriculture must be made to comply with conservation plans. I am seeing too much recreational tillage. Farm Bureau (Farm Bureau Insurance) has too much power and money, they use this power and lobbying abilities to regulate conservation for a small percent of the farmers! Conservation and crop insurance must be combined to make some farmers stop destroying organic matter and eroding soil.

Iowa State University and agricultural publications have done an excellant job promoting what the benefits of reduced tillage can do. We need to make landlords aware that they can demand conservation practice on their rented land. I made that stipulation on our rented land with our renter.

On my travels this winter southwest Iowa is to be complimented on their reduction of fall tillage. Southeast Iowa would receive a D- for their reduction of fall tillage.

Timestamp 1/6/2013 12:51 PM

Name Cheryl Hannah
City
State

Providing comment on the following sections:

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

Regarding the Iowa Nutrient Strategy : The strategy is too weak as it pertains to agriculture runoff. It does not include specific goals with time frames. Any good strategy would have these specific goals laid out. The strategy is unacceptable and needs to be revisited, revised, and done the right way. Thank you.

Name Loren Lown
City Pleasant Hill
State Iowa

Providing comment on the following sections:

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

January 6, 2013

Recently, I downloaded a copy of the Iowa Nutrient Reduction Strategy and printed it out as I still do not like reading from a computer screen. What I read was a disappointment to me.

I now work in the conservation field in central Iowa but for years worked for the USDA in eastern Iowa. As a worker in the field at the time of the 1985 farm bill, it was obvious that 90% of the farmers were waiting until the last moment to implement the modest requirements necessary to retain their eligibility to receive benefits under the legislation.

You do not have rules for those who obey common sense laws - you have them to force compliance by those who would not do so otherwise. Pollution of our waterways is an affront to all citizens of the state. Those who do so □ do so knowingly. An expectation that an individual will act against their best economic interest simply because it is the right thing to do □ is unrealistic.

Proposing voluntary compliance with suggested methods to reduce soil and nutrient runoff from our agricultural land is either extremely wishful thinking or an effort to avoid and delay meaningful reform.

There are exceptional individuals farming in our state that are truly stewards of their land and there are many who are □ corn-mining . The stewards are already reducing erosion and farming as if what they own or manage is a resource for the future and there are those who value only short-term profits. The later need rules to guide them, and to protect all citizens.

Voluntary participation will not work. A plan without teeth will waste years when true progress could be accomplished, result in the loss of many, many tons of topsoil, and place those who are responsible stewards at an economic disadvantage.

Loren Lown

325 Christie Lane

Pleasant Hill, Iowa 50327

Timestamp 1/6/2013 4:28 PM

Name Roger Dahlstrom
City Goldfield
State Iowa

Providing comment on the following sections:

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

What assistance is there if a progressive family wants to participate? Des Register article said money was available since this is for the General Welfare of the Public.

Timestamp 1/6/2013 4:47 PM

Name Jon C Hunstock
City Ames
State Iowa

Providing comment on the following sections:

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

I attended your recent Nutrient Reduction Strategy presentation in Ames at ISU last month, have read the document, and discussed the contents with professionals in ecology and sustainability and I am underwhelmed at the contents of this report for the following reasons:
• The program is entirely voluntary for farmers. You have neither the carrot nor the stick to motivate farmers to participate. My guess would be that those who are the most likely not to participate in a voluntary program are the very people who are most likely not to employ good conservation practices. Think back to the Cuyahoga River when it caught on fire—maybe the Mississippi won't burn, and the Delta won't spontaneous combust but that doesn't mean that there isn't a serious problem that needs to be addressed in a timely manner. You need to determine how timely is timely enough.
• You need to define and quantify the goals and articulate the strategies and mechanisms required to achieve the desired quantifiable results.
• Where are the timetables—with real dates—for measuring progress toward the improvements desired?
• What would be the direct and indirect costs to individual farmers to implement your recommendations, including cost-benefit analysis?
• And what funds are going to be made available to assist farmers? Direct payments, low interest loans, …?
You have a "feel good" document that fails by not clearly delineating the necessary goals and steps to achieving meaningful success. We need to have a substantive policy which you have failed to provide.

Timestamp 1/7/2013 10:13 AM

Name Mike Wilson
City Dubuque
State Iowa

Providing comment on the following sections:

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

I boat on the Mississippi River from Bellvue, IA north to St. Paul, MN. Each year with the Spring thaw and rains, the river rises to near or above flood stage. The Turkey River enters the Mississippi near Cassville, WI. Each time I travel past this area, especially during flood seasons,I am disturbed by the amount of poluted water that flows from the Turkey. Just above the Turkey, the water is much clearer than below. I also travel by car in this area and have noticed that crop and livestock farmers are allowed to till the soil and/or graze animals right down to the river's edge. There is no grassy area along most of the Turkey that could catch chemical and manure runoff from these farms. I assume that this is just what you are trying to study. Travel there and take a look. It is not pretty.

Timestamp 1/7/2013 12:52 PM

Name Wray Childers
City Durango
State Iowa

Providing comment on the following sections:

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

I agree that control of nitrogen,phosphorus,phosphates and all deleterious organic and inorganic compounds need to be controlled in our watersheds, streams and rivers.

The goal should be to avoid or minimize the release of any man-made deleterious materials into bodies of water.

A positive step in this direction would be to monitor and enforce the improper storage and release of deleterious materials within mapped special flood hazard areas (SFHA's). As one example, a wood processing facility located approximately one mile upstream from my house at Graf, Iowa stores thousands of logs, and thousands of tons of sawdust and wood chips and other deleterious materials within a mapped SFHA and has had regular release of these materials into the Little Maquoketa River that subsequently drains into the Mississippi River during at least four flood events since 2002. As of today, there are thousands of logs and an unknown number of tons of wood chips and sawdust within the Little Maquoketa and Mississippi River Floodways for miles from this one Point Source.

Timestamp 1/7/2013 1:50 PM

Name Dan Bratrud
City Osage
State Iowa

Providing comment on the following sections:

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

I think the summary is a great document. It is beneficial to have the scientific documentation to back up the conservation practices that we promote for implementation on Iowa's farmland. It is good to know just how many of what practices we need implemented to reach that "magic number" of 45% reduction.

This document may give our legislators the information to justify additional funding for the conservation practices needed to reach the 45% reduction but I see nothing in the strategy about the social acceptance of the scenarios offered even if the funding is made available.

Another concern would be the time factor. If funding is available and one of the scenarios is socially acceptable, is the taxpaying public aware of the amount of time that it will take to recognize any benefits. It is safe to say that any one of the scenarios offered in the strategy would take a minimum of 10 years to implement. Beyond that there will likely be a 20-30 year lag time before these practices produce the benefits needed to accomplish the reduction. Are taxpayers willing to wait for 30-40 years to get results from millions, possibly billions of their dollars invested?

Name Becky Wehrman-Andersen
City Des Moines
State Iowa

Providing comment on the following sections:

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

Thank you for the opportunity to comment on the Iowa Nutrient Reduction Strategy. I am a hazardous materials consultant and work frequently with contaminated sites and hazardous chemical management. Recently, I was assisting a client with stormwater management that is contaminated with very low levels of lead. I investigated options and came across a product that we are currently putting into place to remove the lead contamination. I am so pleased with the analytical data the company, Filtrexx International, developed and the potential for a cost-sensible, effective solution, that I now represent the company in the midwest.

Filtrexx offers solutions for the filtration removal of heavy metals, petroleum products, bacteria and excess nutrients. This fitration is completed through the use of locally sourced, screened mulch with an absorbant additive that is placed in erosion/silt management mesh that meets highly defined, compliant criteria. These products are further defined at www.filtrexx.com I would encourage all interested parties to evaluate the potential use of the NutriLoxx products in particular to help resolve the concerns identified in the Nutrient Reduction Strategy. I will be contacting each agency independently to provide additional data and information. Please contact me at becky@filtrexx.com if you have questions or to implement the use of this product. Thank you for your interest.

Becky Wehrman-Andersen

Filtrexx, International

Des Moines, IA

becky@filtrexx.com

Timestamp 1/8/2013 1:33 PM

Name David E. Johnson
City Granger
State Iowa

Providing comment on the following sections:

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

I have worked for many years in the mining industry. I am keenly aware of the environmental requirements and restrictions for this industry and the efforts taken meet and exceed them. At the end of the day polluted water is still polluted whether it comes from a mining facility or a agriculture operation. For the sake of a fragile ecosystem, public health and limited water resources, agricultural operations must adhere to the same environmental rules as the mining industry here in Iowa.

Timestamp 1/8/2013 2:01 PM

Name John Klein
City Carroll
State Iowa

Providing comment on the following sections:

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

I will keep my comments brief.

For the amount of time it took to study the water quality problem in our state, I am greatly disappointed that the results of the study are so wishy-washy. I hope that had nothing to do with political pressure coming from career politicians or large agricultural organizations. They seem to be bedfellows.

With numerous studies outlining the sever water quality problems that Iowa has managed to maintain, it is small wonder that the EPA is breathing down our necks for doing very little to make a difference.

Perhaps it is time for a change in policy and actually DO SOMETHING about our environmental problems. What has been done has been largelly due to the federal government actions, not the state. As those financial resources shrink, as they surely will, it will be up to the state to take some responsibility.

I hope the policy makers and the legislature have the courage to stand up to their lobbiests powerbrokers and serve the majority of the people and natural resources of Iowa.

Thank you for taking the time to hear my concern.

Timestamp 1/8/2013 5:30 PM

Name Grace H. Zimmerman
City Anamosa
State Iowa

Providing comment on the following sections:

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

As a farm wife, I sincerely believe the science-based research in nutrient reduction would be working far better than the passing of stronger regulations. The voluntary efforts are are using methods to reduce both point and non-point sources. It is the combined effort of Iowa Secretary of Agriculture, Bill Northey and the Iowa Department of Natural Resources Director, Chuck Gipp, with the aid of a science assessment by Iowa State University. It has a three-fold purpose to work with cities to reduce nutrient discharges, protect natural resources and offers methods for farmers to maintain agricultural productivity. This Jones County farmer owner congratulates the groups whom have worked to achieve this Nutrient Reduction Strategy.

Timestamp 1/8/2013 8:46 PM

Name Peter Bixel
City Kanawha
State Iowa

Providing comment on the following sections:

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

My name is Peter Bixel and I farm in Iowa along with being the Team Leader for SciMax Solutions. You can learn more about us at www.scimaxsolutions.com.

Nitrogen management by a calculator is not the way to start. This is an easy out and way too simplistic. This takes all the science out of N management. A graph from Iowa State's website *(attached below) illustrates the extensive variability that exists between optimum N rates and yield. The optimum N rate only intersects a few of the given data points - use of an average optimum N rate provides a recommendation that is incorrect for the vast majority of fields or points in a field. There are other alternatives that can be looked at rather than making things simple .

Historically, application of commercially available fertilizers have been made uniformly across farm fields. Today it is known that fertilizer need by crops varies across a field due to soil variability. While lime, P and K fertilizer are commonly variable rate applied, N fertilizers are still predominantly uniformly applied due to a lack of accepted methodologies to make such applications. An approach to variable rate apply N (SciMax Nitrogen) has been under development in Iowa for the past 8 years that utilizes the Illinois Soil Nitrogen Test (ISNT) and other supporting agronomic information. Growers in the north-central part of the state have been using the approach on approximately 15,000 acres for 5 years. Approximately 30 lbs of N/a, or more, have been cut from the usual farm N rate used on these program acres. Our data suggests that further cuts can be made. The results that we have seen with our growers illustrates clearly that uniform rate applications of N make little sense and strongly suggest that a key to reducing excess N applications in Iowa, and for that matter the Corn Belt, is to variable rate apply N along with utilizing stabilizers on all acres.

Thank-you for your time and efforts.

Sincerely,

SciMax Solutions and VH Consulting, Inc.

Peter Bixel

*http://extension.agron.iastate.edu/soilfertility/nrate.aspx

Timestamp 1/9/2013 9:11 AM

Name Katie Elgin
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Please continue to adequately fund the state nutrient reduction management strategy so we can continue to improve production practices and efficiency. Thanks. Katie Elgin

Timestamp 1/9/2013 9:13 AM

Name Steve Peterson
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

As a 4th generation farmer in Webster County Iowa I please urge your support of a science-based state wide nutrient reduction strategy that recognizes the importance of all vollentary conservation practices in order to meet the growing need of agriculture in the future.

I also urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy as well as ALL other programs concerning conservation and cost-share programs. Failure do to so will only hurt these conservation practices as has happend in the past.

On my farm I have used cost-sharing to build and rebuild terraces and the installation of waterways to help reduce erosion and nutrient runoff on my farm in Webster County. Steve Peterson

Timestamp 1/9/2013 9:16 AM

Name Tim Niess
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am writing to encourage your support of the Nutrient Reduction Strategy proposed by IDALS, DNR, and ISU. It is a voluntary approach to this problem, which is quite honestly the major point of contetntion with environmental groups. They see this as an opportunity to finally punish farmers for percieved crimes against humanity. The reality is that, unless farmers feel they are a valued partner, in a well funded plan that shares the cost among all stakeholders; even a mandatory approach will be less than successful. Mr. Beaman and his supporters say this is a priority issue, but it appears cleaner water takes a back seat to their lust for a public trial of modern agriculture.

This is a good plan, put together by credible experts, and deserves to be funded properly. Tim Niess

Timestamp 1/9/2013 9:20 AM

Name David Brandt
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

As a 3rd generation farmer in southwest Iowa, I fully support the Iowa Nutrient Reduction Strategy and urge you to adequately fund this program as well as other current conservation cost-share programs.
Over the past 60+ years my family has been farming in this area, we have invested tens of thousands of dollars of our own money on soil conservation structures. We have utilized many voluntary cost-share programs for soil conservation as well, especially terrace and dam building and repair cost-share programs. Most recently in the past 2 years. It is vital for any soil conservation program to have adequate funding to achieve the result we all need for our futures.
I urge you to support the Iowa Nutrient Reduction Strategy and fund this and other conservation programs. David Brandt

Timestamp 1/9/2013 9:24 AM

Name Derrick Black
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

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

Farmers are protectors of their land. They want to continue to be part of the solution, but they know that new regulations aren't the answer.

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

You the lawmakers need to assure that this program is adequately funded , as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects.

Buffer strips and tillage practices including no till and strip till has been an good start on the farmers side in protecting the water sources in this beautiful state. The future of water quality protection in Iowa is in your hands! Thank you for taking action!

Sincerely, Derrick Black

Timestamp 1/9/2013 9:24 AM

Name Alan Ibbotson
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I writing you to let you know that I support the science based state nutrient reduction strategy and voluntary conservation practicies.

I hope that you support funding Iowa Nutrient Reduction Strategy as well as other cost share programs for conservation for the state of Iowa.

On our farm we follow many conservation practices to insure that our farm will be viable for years to come. Alan Ibbotson

Timestamp 1/9/2013 9:44 AM

Name William Sutton
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

As technology has advanced, so has the means and motivation for farmers to use nutrient strategies that not only help the environment, but simoltaneously create an economic benefit for the farmer. One example of this is Ag Leader's Optrix crop sensor. It allows real-time diagnosis of the corn plant's nitrogen needs via infrared reflection, and enables variable rate nitrogen application as the applicator moves through the field.

Applying only as-needed nutrients through the use of Optrix is an economically viable option for farmers today. Even though there are varying levels of support for the environment among farmers, all farmers care about their survival, and will adopt technology as it benefits the bottom line.
I have used the Optrix for the last two years and look forward to using it again in 2013.

Consideration of a baseline nutrient loss value is also very important to an overall strategy. Virgin prairie with a tile line beneath it will show nitrogen losses that also end up in the Gulf.

We need a strategy that will not limit crop production, yet minimizes losses from the ecosystem. A voluntary approach is the only way to reach that goal as it puts the responsibility solely on the producer.

If the voluntary approach and the reductions that come with it are not enough to appease the EPA, then a clearer picture of states rights need to be defined.

Bill William Sutton

Timestamp 1/9/2013 9:55 AM

Name Jon Passow
City Clare
State Iowa

Providing comment on the following sections:

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

With current public sentiment opposed to farmer/agriculture government benefits, I would guess the bulk of expense is going to be shouldered by the individual operator. Every scenario depicts lower yields with higher costs, big surprise there! The American consumer is already complaining about rising food costs, taking more land out of row crop production and increasing costs on the remaining acres isn't going to lend itself to happy grocery shoppers. It also gives a competetive advantage to non-US growers.

Timestamp 1/9/2013 9:59 AM

Name R Curtis Zingula
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

There is very good reason for the Iowa Legislature to support funding the Iowa Nutrient Reduction Strategy. As identified by Iowa State University, two of the most effective means of reducing nutrient loading in streams is by tile outlet bio-filters and cover crops. However, because these are relatively new conservation procedures, they are not widely understood let alone commonly utilized.

We can approach these and other conservation techniques in two possible ways; either by regulation or "carrot on a stick" incentives to couple landowners and resource authorities such as the NRCS.

Regulations would be broad based and therefore lead Iowa down the road of embarassing failure. Last summer I was told by an environmental activist that farmers should be required to install stream buffers. However, the run-off on my farm already enters Indian Creek via two grass waterways, thus bringing into question the value of paying me some $14,000 dollars to enroll in CRP grass buffers.

Every farm needs to have its own conservation prescription due to variations in soils, topography and farming techniques. Farmers have shown a solid improvement in soil erosion losses while working with the government to implement new practices. I believe, based on what those farmers tell me and my own preferances, that farmers will strive to keep expensive fertilizers on their farms, especially if they receive advice and financial assistance from people they already work with and trust.

With the help of the Iowa Legislature, we can make Iowa a bench-mark leader in nutrient conservation. R Curtis Zingula

Timestamp 1/9/2013 10:00 AM

Name Joe Ludley
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

The time is right this year with the anticipated surples, adequately fund the Iowa Nutrient Reduction Strategy, as well as the state s other conservation cost-share programs. Iowa s failure to adequately fund these programs in the past has delayed needed conservation projects.

Twenty five years ago, I built terraces on my farm and within 5 years, there were terraces on both the farms that joined my land. Terraces and no-til make HEL land quite farmable. On another farm after I started no-til a bordering resident said previously with heavy rains the runoff would go over the street and now it doesn't even fill the culvert.

Voluntary conservation practices will be implemented with a little of cost share stimulus
. Please give careful consideration to a science-based state nutrient reduction strategy. Joe Ludley

Timestamp 1/9/2013 10:03 AM

Name Nate Kitzinger
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

As you know Iowa s farmers are some of the best in the world. We are in need of your immediate support to fund the Iowa Nutrient Reduction Strategy program. This is a science based program that allows farmers in all geographic regions of the state to succeed in managing nutrient loss and have a positive impact on the quality of our natural water systems in Iowa.

The recommendations laid out in this strategy are based on sound research and scientific results from Iowa State University. Who better to lead a program to help us than one of the leading land grant universities" The researchers at ISU understand our diverse landscape and have developed methods for mitigating nutrient loss, into our waterways, that are best for specific regions of the state. We need to have the opportunity to begin to implement these strategies on a voluntary base because we will be able to find the most efficient way to get that done. When a regulation comes from the federal level it will be too broad and far reaching to be effective for those who will be affected. As a farmer in North-central Iowa I know that the conservation methods that work on our mostly flat land are far different than the practices that would need to be implemented in fields that are nearer to either of the major rivers on our East or West borders.

The economic strength of individual farming operations should also come into play in regards to the voluntary implementation. While a farm with less capital to invest is certainly not excused, they should have the opportunity to step into the process; whereas a more well-to-do operation may choose to make many changes at the same time and move forward. Both scenarios likely have the same goal of reducing nutrient loss.

By supporting the Iowa Nutrient Reduction Strategy you give our Iowa farmers the opportunity to set an example for the Nation and be leaders in this important arena. The benefits and results of a program that is producer led and implemented program will always outweigh something that is mandated and forced upon us by a regulatory agency. Nate Kitzinger

Timestamp 1/9/2013 10:06 AM

Name David Stoulil
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Please support and fund Iowa Nutrient Reduction Strategy. It depends on VOLUNTARY cooperation by area farmers to protect our local water supplies. It has been proven that voluntary cooperation has and will continue to work. We do not need any more regulations thrown at us!! These practices are based on scientific research that have been proven to work. Thank You David Stoulil

Timestamp 1/9/2013 10:08 AM

Name Gary Klejch
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I request your support of voluntary conservation practices using science-based state nutrient reduction strategies. Mandated approaches don't meet individual needs or improve results. Farmers know the way to grow crops with the least amount of nutient waste by using timely application,no-til,terracing,and contour farming. Practicies used very by farm and soil types, so having set standards will not achieve the best results. PLease fund the Iowa Nutrient Reduction Strategy and the state's conservation cost-share programs. They are proven as effective and cost efficient. Gary Klejch

Timestamp 1/9/2013 10:14 AM

Name Maurice Busch
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

In today's pursuit of higher yields, it becomes imperative that we find workable means to raise these high yielding crops and provide the crop the nutrients necessary. The complexity as yields and nutrient needs increase will require good stewardship and an environment that will allow us to feed a growing world. Legislation will need to carefully weigh sound science based nutrient information to allow an ever changing farming evolution. Funding to promote good conservation practices will be necessary to help make this all come together. As an example, our farm has made extensive use of filter strips along the streams going through our property. They seem to be one of the best programs that exist to protect our water quality. The only change, I would like to see a mid to late season haying allowed to provide a more moderate amount of cover so that water would be more apt to go across the filter strip instead of running along side of it. Good conservation measures and a careful amount of regulation to allow an adequate amount of fertility to raise high yields, be it from manure or other forms of fertilizer, will need to be balanced. Maurice Busch

Timestamp 1/9/2013 10:18 AM

Name Russell Meade
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am a fifth generation farmer from Johnson County and I want to ask that you support with funding a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain our current agriculture production.

Our operation involves three families. We have been implementing voluntary conservation practices that best suit the lay of our land and our production. We use no-till, contours, water ways and buffer strips along creeks. We have a cow-calf and feedlot operation that supports rotational pastures and hay with in the operation. We need to avoid a one size fits all approach. Real experience with your farm can sometimes prove official guidance wrong, we have been told on a map in a NRCS office to plant straight up hills because the map did not accurately reflect the true lay of the land.

We need adequate funding for the current Iowa Nutrient Reduction Strategy and for voluntary conservation cost-share programs. Russell Meade

Timestamp 1/9/2013 10:23 AM

Name Steve Boerhave
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I'm writing to ask you to please support Iowa Nutrient Reduction Strategy. By support I also mean to adequately fund it and other conservation cost-share programs.

I currently use ISU nutrient recommendation for applying the correct amount of nutrients to my soil. 1 reason is because to cost of commercial fertilizer can run $250 per acre but using the correct rate of manure I can cut my cost to $80 per acre. (why would anyone over apply and trough money away)

I also use filter strips, CRP, tree planting and other programs to improve the environment. Steve Boerhave

Timestamp 1/9/2013 10:27 AM

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

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

Timestamp 1/9/2013 10:29 AM

Name Jesse Willis
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Please support a science based nutrient reduction strategy for our state. We all want are waters to be safe for everything and everyone. As you all know agriculture is the main thing keeping our states economy going. By keeping cost sharing monies availiable this would help insure cleaner waters. Farmers are using buffer strips and other conservational practices to help ensure cleaner waters. Jesse Willis

Timestamp 1/9/2013 10:31 AM

Name Grace Zimmerman
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

The Nutrient Reduction Strategy was worked out by the Bill Northey of the Iowa Dept. of Agriculture and Land Stewardship and the Iowa Dept. of Natural Resources with an added assessment by Iowa State University. This workable plan offers strategies for farmers to reduce nutrient loss and the IDNR will be cooperating with industries to reduce nutrient discharges from point sources to Iowa streams.

A voluntary program is surely more effective than a government run program which is not really in "touch" with those involved. Remember, funding will benefit all citizens of Iowa.

Hi, Bruce, the former Onslow student from Mrs. Z. Grace Zimmerman

Timestamp 1/9/2013 10:36 AM

Name Jeremy Hollingsworth
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I farm with my dad in Southeast Iowa. Between the two of us, we farm about 1700 acres. We both have off farm jobs in order to make ends meet. Keeping regulations on farms to a minimum is very important to ensure that our way of life can be sustained.

I am in favor of a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. I urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. If these programs are not adequately funded, much needed conservation practices may not be able to be installed on the land.

On our farm, we have installed tile outlet terraces, ponds, grassed waterways, and grassed filter strips to help protect the land and other natural resources. Many of our farm neighbors have done similar practices to help protect their land. As farmers, we want to do the right thing to protect our land because our farms are not only a source of income, but also our way of life and an investment for our future generations.

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

Timestamp 1/9/2013 10:43 AM

Name Robert Ostwinkle
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I wright to you today and ask you to please keep the water quality and nutrient reduction strategy for Iowa on a voluntary basis. More regulations are not the right approach. There are millions of dollars of conservation practices and projects that can reduce runoff that remain unfunded. The funding for these projects should found and funded. A voluntary approach will always look for new and better pratices and never stop improving,regulations on the otherhand will recieve the I'm in compliance and nothing more need be done. I was told at a recent meeting with legislatures that water quality over the years shows no improvment. In dubuque county and surrounding counties there were a number of water shed projects done to improve water quality in creeks and rivers. I believe that an improvement was made, I also believe that to say there in no water quality improvement is wrong. I believe they are cherry picking results, you should be sure tests on water and runoff are done fairly and junk science is not used to pass a regulatory agenda that takes away or flexability to make our own decisions. I have not meet any farmer who wants to pass on dirty water or a lesser quality of water to their children or grandchildren. Something on water quality you can do something on is this, over several years we have been using floruesent bulbs. The bulbs were to be costs saving and better for the enviorment,as bulbs failed we saved them for recycle. My wife and I decided time to recyle these bulbs they have been out for several years we called around looking to recyle them. We had a hard time to find anyone who would take them, there should be all kinds of drop sites afterall they are common in every home. I found out that a business must recycle them but a homeowner can throw them in the landfill. These bulbs have mercury in them, why in the world are they discarded like that where is the mercury going" I would like your thoughts on the amount going in landfills and why this is OK. Robert Ostwinkle

Timestamp 1/9/2013 10:53 AM

Name Paul Campbell
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am contacting you to encourage your support to fully fund the Iowa Nutrient Reduction Strategy. I know there is never enough money to go around but we have first hand seen the benefits of installing properly designed waterways and terraces on our farm.
There has been a lot of work done but there is more to do. Technology is always changing we need to keep up so we can pass the land on in better condition than when we stated
Thanks for your time and future efforts on this matter. Paul Campbell

Timestamp 1/9/2013 11:19 AM

Name Jeff Cuddeback
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am concerned that, eventually, the EPA will descend upon our state and decisions better made by Iowans who understand production agriculture will be superceded by those of bureaucrats in Washington, D.C. Therefore, I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

I urge state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state s other conservation cost-share programs. Iowa s failure to adequately fund these programs in the past has delayed needed conservation projects. Farmers, including me, will willingly sign up for these programs. These programs, in addition to conservation tillage practices employed by the majority of farmers in my neighborhood, have become effective tools in reducing soil erosion and nutrient/chemical run-off. Jeff Cuddeback

Timestamp 1/9/2013 11:32 AM

Name Bret Seipold
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I support reducing nutrient levels on a voluntary basis that is based on sound science. That is how I farm. I don't put on any extra and don't want to lose production by not putting on enough. I maintain terraces and no-till to keep soil and nutrients in my fields.

Presently all N,P & K are spread over the top and I have done that for 21 years. Next year I want to try injecting NPK into the ground in the fall in one trip. I suggested that option to my co-op manager and he said that is a very good program. I will either try it on all or part of my acres next fall if the correct conditions exist. I should have even less nutrient loss and better crop utilization with this change.

I ask that the Iowa Nutrient Reduction Strategy and other state conservation cost-share programs receive adequate funding. Most years these programs have been well funded, but lately some conservation projects have been delayed while waiting for cost-share money. I have benefited from cost-share to build terraces and install drainage tile a few years ago and would like to have it available in the future if the need arises.

Using sound science to find the best way to utilize costlly nutrients and keeping them out of the water helps everyone as we continue to find ways to feed an ever growing world population. The producers will voluntarily do their part! Bret Seipold

Timestamp 1/9/2013 11:36 AM

Name Kurt Steward
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I believe that the introduction of the Nutrient Reduction Strategy is a great thing and I applause those for the idea.

Who not better to ask than the farmers that manage the land.

We as landowners and farmers find believe that it is a great practice to conserve the land we live on use to produce food for the world. We take great pride in doing so.

We have incorporated many conservation practices into our family farm and plan to continue. We have recently redone tiling projects, reshaped water ways, cleaned out terraces, and use buffer strips along water ways. We want the nutrients to stay on our land to improve our crops not see those products be washed away.

I hope you can support this project as I see it as a great cause for our environment and our economy by not bringing on unnecessary government regulations. Kurt Steward

Timestamp 1/9/2013 11:45 AM

Name Randy Christensen
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

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

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

Share voluntary conservation practices you ve already implemented and those you hope to implement in the future to benefit your farm and the surrounding environment. Randy Christensen

Timestamp 1/9/2013 11:53 AM

Name Van Meek
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

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

I urge you and other state lawmakers to fund the Iowa Nutrient Reduction Strategy adequately and also the state's other conservation cost - share programs. Iowa's failure to adequately fund thes programs in the past has delayed needed conservation projects.

I have enrolled ikn the CRP program, and installed ponds. In the future I plan to participate in the Little Lick Creek watershed project.

Thank you/ Van Meek

Timestamp 1/9/2013 11:56 AM

Name Steven Thompson
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Conserving our resources is important to everyone. Finding the best ways to do that in farming while working to make a living has to be done on an individual basis because the soils, management skills, resources, and financial condition of every farm are different.

I have read the Iowa Nutrient Reduction strategy and believe it offers a good approach to achieve it's goals. Several conservation practices have been evaluated to determine the effect they have on nutrient loss. Research needs to continue to fine tune this information for different soil types and environmental conditions.

I have planted some cover crops for three years. I do it because I believe it will improve my farm. However, the limitations of time and money can make it hard to do as much as I would like to. Some limited financials incentives could help me do more or help someone else try something new.
Iowa's farmers have done many things to conserve their soils while they provide food for this state, nation, and world. If this plan will require greater efforts and costs from them, some cost share funding should be provided.

Thank you for your consideration. Steven Thompson

Timestamp 1/9/2013 11:57 AM

Name Frank Klahs II
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I support a science based nutrient reduction program that includes voluntary conservation practices. I own farmland and it provides my income so I do everything possible to conserve my agricultural business. I have filter strips on all land next to creeks. I don' till bean stubble. I do minimum tillage on the stalk ground as well. I apply a reasonable amount of fertilizer, pot ash and phosphates.

Farmers can do this voluntarily and that is best. More regulations will not fix the problems that certain individuals and groups have been talking about. Frank Klahs II

Timestamp 1/9/2013 12:04 PM

Name Paul Gieselman
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

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

I urge you to adequately fund all available conservation and Nutrient Reduction Strategry programs that are available.

My farm currently uses conservation buffer strips as well as a multitude of terraces and tiles. We preformed expensive mantience on some of these structures this fall. No funds were available to costshare this mantience where in the past it was readily available. I have explored nitrogen reduction structures and silt capturing ponds for my future conservation practices. Paul Gieselman

Name Marian Riggs Gelb
City Des Moines
State Iowa

Providing comment on the following sections:

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

I am compelled to write to comment on the recently released Iowa Nutrient Reduction Strategy. Having been involved with an environmental non-profit organization which attempted to get information about and have input on the Strategy over the two years that it was being drafted, behind closed doors with a secrecy protocol more stringent than most national security issues, I had to laugh out loud when I read in November that it was jointly drafted by IDALS and DNR. As the Des Moines Register appropriately noted, the people at DNR responsible for implementing their part of this strategy had not seen the report, let alone had an opportunity to have input on its creation. So why was I surprised that an environmental advocacy organization would not be allowed to have input? Because that is not how public policy is supposed to be created in Iowa. We have a rich history of looking at issues from all perspectives with ALL of the stakeholders involved having an opportunity to have input in order to create policy that is a compromise and can be embraced by everyone involved. It is obvious, given the nearly direct quotes from the Farm Bureau policy statements that showed up in the strategy , that only one stakeholder was allowed to have input into this proposal-that of the large, agri-business community.

As a result, this strategy maintains the business as usual scenario that has a stranglehold on Iowa and will not even begin to actually address or solve our water quality issues.

Science has demonstrated that more than 80% of our water quality problems are the result of run off from our agricultural lands. We have tried the all-voluntary approach for farm conservation programs to stem this problem. It has not worked. Our impaired waters list continues to grow, algae blooms are prevalent and people are leaving the state to recreate-taking their dollars with them-dollars that could go a long way towards boosting our rural economy.

The strategy fails to set any kind of long-term or short-term goals for water quality improvements or timetables by which these goals should be achieved. What kind of a strategy doesn t have goals and metrics to measure them by? How will we know if the strategy is successful without these goals and these timetables?

Iowa State University participated in the preparation of this Strategy by reviewing the effectiveness of currently available conservation strategies and their impact on water quality. Pardon my cynicism, but Iowa State is firmly in the pocket of Farm Bureau and the other large commodity organizations that fund the majority of its research now that public funding is nearly non-existent. We all know that it is not prudent to bite the hand that feeds you , so any science out of Iowa State is suspect to begin with and filtered to support its funders before it is made available to the public. This is another topic for another time, but this kind of bias is shameful coming from a land grant institution (whose leadership has done nearly everything in its power to stifle or silence the Leopold Center on Sustainable Agriculture-whose findings and research could definitely help solve our water quality problems.) The impotency of Iowa State and its scientific findings are evidenced by that fact that their findings are reduced to suggestions not policy recommendations, and the policy section of the strategy does not propose a combination of these practices that Iowa farmers should implement or, again, any kind of goals for implementation or timetables. IDALS says that is because there is not a one-size fits all solution for our landscape. I understand that, but there are only so many conservation strategies out there and I think we have a pretty good idea where those are and are not effective. IDALS hesitance to actually make any real recommendations underscores the true intent of this two-year waste of time the fewer changes the better for Iowa s agribusiness community and to hell with Iowa s citizens who own these waterways and have a right to expect that farmers do what they should to keep them clean.

We wouldn t let a manufacturing company on one of our rivers dump into the river without some oversight and its time that the public and Iowa s decision makers stood up to Goliath and let them know that we won t take it any longer! We want state government leaders to explain how they are going to establish accountability with this strategy and how they intend to measure whether or not it is being effective. Public money has gone into the creation of this plan and supports the conservation efforts that it suggests. We have a right to know whether our money is being well spent. My bet, with this plan, it is more money down the manure pit and continued poor water quality in Iowa.

With the Best of Intentions,

Marian Riggs Gelb

2300 Thornton Avenue

Des Moines, Iowa 50321

515-229-3712

Timestamp 1/9/2013 12:08 PM

Name Marian Riggs Gelb
City Des Moines
State Iowa

Providing comment on the following sections:

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

Timestamp 1/9/2013 12:16 PM

Name Michael Turnis
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Please support the iowa nutrient reduction strategy , not only by funding, but the adoption of voluntary conservation practices to aid in the completion of these practices. Michael Turnis

Timestamp 1/9/2013 12:19 PM

Name Walter Hommer
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices. As a supporter of Ag and a voter in your district I urge you as a state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy. In the past failure to properly fun these programs has delayed several conservation programs. Take time to think whats right and wrong. Walter Hommer

Timestamp 1/9/2013 12:50 PM

Name Mark Schwery
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I hope you lawmakers adequately fund the Iowa Nutrient Reduction Strategy, as well as the other state conservation programs. Failure to do so has really hurt these programs in the past. On our farm we have buffer strips on both sides of the creek for the past 12 years and it has really helped save soil and reduced run-off. Theser programs are good for us and the state. Thank you in advance. Mark Schwery

Timestamp 1/9/2013 1:12 PM

Name Jason Russell
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Soil erosion has dramatically been reduced in the last 20 years, this isn't by accident. Many farmers have voluntarily implemented their own nutrient reduction strategies to save money on inputs and inprove soil health. On our farm we use precision technology to produce more crop with less nutrients. We also use reduced and minimal tillage with cover crops and grass waterways to all but eliminate soil leaving our farm. These and other items are becoming more common as other farmers see that they work. I urge you to consider expanding these and some new methods by showcasing the practices that work and help fund them. Forcing changes to occur rather than incentivising would be difficult and dictatorial. Science based methods will ensure we don't jeopardize productivity and profitablity of farmers. Jason Russell

Timestamp 1/9/2013 1:15 PM

Name Kyle Holthaus
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Hi, my name is Kyle Holthaus , my family and I have a small farm.We raise vegetables ,sheep, chickens, and I manage a modern hog barn.

I take great pride in the conservation I do on my farm. I leave grass buffers on all of my fields as well as leaving waterways.

I want to ask that you support the voluntary nutient reduction strategy.Science needs to be used in the best measure to move forward.This with fund cost share programs are the best for all, and will prevent a one size fits all ,which would not be good for my small farm. Kyle Holthaus

Timestamp 1/9/2013 1:34 PM

Name Joy Goins
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

As a livestock producer, I support a science-based nutrient reduction plan. There is no one more concerned about the environment than farmers. If lawmakers will adequately fund the program, farmers can place conservation practices that would protect water quality on their farms. Those practices would also benefit large areas of our nation. On our farm we already have built buffer strips, silt collection terraces, and are using cover crops to conserve the environment. If there were funds available, we would place more ennvironment protecting practices in place on our farm.
Please support legislation implementing voluntary practices and funding for the implementation. Thank you for your continued support for agriculture. Joy Goins

Timestamp 1/9/2013 1:46 PM

Name Jennifer Gardner
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I currently own, live and work on a Heritage Farm, which means it has been in my family name for over 150 years. A Gardner settled on the very land that I live on in 1843, even before Iowa was officially a state. Farmers live on the land because they love it. It is hard work and often times, for very little monetary profit, but farmers continue to do it because they love the land and they enjoy knowing that they are doing something that can be passed down from generation to generation.
With that in mind, farmers take care of the land based on science and research. They do not go off on a "theory", only to find it isn't workable, nor does it have the success rate it is advertised to have.
Many times, people that live in a city, on concrete and have no experience with the land, water, or weather, try to make policy to "help" out "dumb farmers".
Farmers work with the land, water and weather every single day, and they KNOW what works. To assume they do everything for money, and do not care about the land or natural resources, is to say every politician is is bought by special interest groups and looks out only for their personal interest. I hope that is not correct.
Please support research based policy that will allow for voluntary conservation practices so that farmers can continue to provide safe food to the world, as well as preserving the land for future generations.
Thank you. Jennifer Gardner

Timestamp 1/9/2013 1:57 PM

Name Jimmie Smith
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

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

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

Timestamp 1/9/2013 2:06 PM

Name Amy Echard
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

As you are well aware, the hills of Clayton County are beautiful; yet, those very same slopes cause great difficulties for farmers. We are one of those lucky farmers and hope to remain that way for quite some time. That is why I'm wondering how you perceive the budget item to adequately fund the Nutrient Reduction Strategy or the state's cost share programs for conservation"

Budgets are at the forefront of every discussion; however, the state's nutrient reduction strategy, in conjunction with a balanced voluntary cost share program, approach this conservation issue in a sound manner.

One example of this great program was on a farm located on the hills of Volga. We spent countless hours to coordinate with Cindy Mensen from the County FSA office and Pat Schaeffers from the NRCS office to propose adequate buffer strips and laid out planting contours that can be incorporated into the CRP program on a farm were slopes were an issue. By doing this we: 1) Effectively managed the water and nutrient run off to preserve its nature, 2) Were compensated for land that was taken out of production and effectively managed the crops that were planted, 3) Enhanced the longevity of the land and the surrounding environment.

I hope you are able to take the time review the funding of these projects, to ensure a balanced budgeting approach, that meets the conservation needs, without over regulations! Amy Echard

Timestamp 1/9/2013 2:34 PM

Name Paula Ellis
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am writing you in regards to the nutrient reductions strategy. I support a science-based nutrient reduction strategy that recognizes the importance of conservation practices.

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

I believe in conservation practices. We have installed several terraces, buffer strips and grass waterways on our farms with conservation money. As of right now our county has a 5 year waiting list for state money funds to go towards a terrace project. It shouldn't be that long of a wait for a farmer wanting to protect there soil. I urge you to adequately fund the Nutrient Strategy and other conservation cost-share programs. Paula Ellis

Timestamp 1/9/2013 2:41 PM

Name Devon Murray
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

As a young farmer in North Iowa, I fully support a science-based state nutrient reduction strategy. For the future of Iowa's most recongnized asset, farming, voluntary conservation practices are a necessity. I believe the use of conservation pracices help farmers save money on inputs in the long run and increase their return on investment (crops). By adequetly funding things such as Nutrient Reduction Strategy programs and other conservation based strategies, spreading knowledge and helping farmers implement strategies to reduce, specifically N and P contents through leaching and erosion would greatly benefit both the farmer and the environment.

On my farm, I have implented no-till practice on acres that have a long steep slope to them. I maintain a corn and soybean crop roation with conservation tillage, leaving more residue on top. I believe in timing anhydrous after the 50 degree mark in the fall to help reduce leaching and also have started going to more of split nitrogen application on my corn following corn acres, such as applying a little less in the fall and coming back in June with a sidedress bar and putting more liquid nitrogen on after corn is a few inches tall. I have and continue to up keep buffer strips on acres that border streams and rivers to help reduce erosion, as well as continue to build more waterways in places that need one to help alleviate erosion from the field to the ditches, streams, and etc. I plan to continue these practices and advance my approach to conservation practies to take my yields to the next level and do my part to help the environment.

Thank you for your time. Devon Murray

Timestamp 1/9/2013 3:15 PM

Name Chris Green
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Please support the state nutrient reduction strategy that was developed by Iowa Dept. of Ag, IDALS, Iowa DNR and ISU. I believe that the voluntary conservation practices will be easily adopted by Iowa farmers. Just look around at the practices that farmers have adopted without manditory conservation practices. I currently no-till where I have erodible soils. I am looking into cover crops for 2013-2014.

Please support and fund this strategy plan and other conservation plans that are in need. Chris Green

Timestamp 1/9/2013 3:19 PM

Name Norman Fleagle
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

It is important to maintain funding for the conservation programs to maintain control of excess run off of water and loss of soil. Most of the water runoff in Warren County goes to Red Rock lake and so farmers volunteering to maintain the conservation efforts is critical to water quality.

By keeping the control of water runoff, it keeps much of the nutrients in place instead of running off and requiring more to get crop yields.
Norman Fleagle

Timestamp 1/9/2013 3:29 PM

Name Clinton Rubey
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am in favor of and believe in the encouragement of voluntary implementation of conservation practices that improve water quality. You will attract more bees with honey than you will with vinegar.

I have installed terracing and grass water ways on my land even when what needed doing did not qualify for government cost share. I hae obseerved other land owners doing the same in order to protect their land.

Farm land owners realize land ownership is a long term investment and they know they must maintain the land to protect nature as well as their financial investment. Clinton Rubey

Timestamp 1/9/2013 3:34 PM

Name Rex Waller
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

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

The largest wastewater treatment plants need special attention. Rex Waller

Timestamp 1/9/2013 4:24 PM

Name Rodney Faris
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

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

We already have many conservation practices in place on our farm and would like to continue to put more in place. We would like to have adequate funding in order to do this.

Please support the Iowa Nutrient Reduction Strategy so all farmers can implement conservation practices. Rodney Faris

Timestamp 1/9/2013 4:34 PM

Name Lenny Watts
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I would like to ask that you would support voluntary conservation practices. The nutrient Reduction Strategy should be science-based. I would like to have support on the cost share as well. In Iowa we have a lot of different soil types as well as slops. Using a one size fits all approach is not what we need for better water quality. Thank you for your support. Lenny Watts

Timestamp 1/9/2013 4:42 PM

Name Waylon Brown
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am sending this message to express my support for a science-based state nutrient reduction strategy. I feel that this needs to recognize the importance of voluntary consevation practices and it also needs to maintain agricultural production.

In order for any program to suceeed it needs to be adequetly funded. I urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost share programs.

We have implemented many conservation practices voluntarily already some of them are as simple as no-till practices, and rebuilding the water ways in our fields. We have also taken advantage of the technology that is "at our finger tips" we use soil nutrient maps to see where we need to apply nutrients and where we do not. We are able to apply the nutrients in the soil where only the plants can reach it. Even the auto steer that we use helps with nutrient reduction because it eliminates overlap of product.

My family has operated a farming operation for five generations, we care about the land natural resources and wildlife that surrounds us.

The state of Iowa has the opportunity to be a leader and not a follower in these areas. Again I urge you to support a science based state nutrient reduction strategy that reognizes the importance of voluntary conservation practices and the need to maintain agricultural production.
Waylon Brown

Timestamp 1/9/2013 4:57 PM

Name Adam Hansen
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Please support the Iowa Nutrient Reduction Strategy developed by ISU, IDALS, and the DNR. As producers, we should all be concious of our soils and what we put in them. I support this plan and will continue to utilize the measures our farm already does. We spring apply our NH3, use no-till to conserve soil, nutrients, and water. We are also in the CSP program and use filter strips along our creeks. I've also been looking into strip-till to cut down on fertilizer usage.

Please allow funding for this project and the other conservation cost-share programs. More farmland cannot be made, so we must be able to protect what we have. Adam Hansen

Timestamp 1/9/2013 5:22 PM

Name Mark Keast
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Iowa State University. That is the first thing that pops into most folks minds when they have a agriculture/science question.

Science should be the guiding factor when planning conservation issues. When producers have guidence from a respected institution such as ISU, they usualy happily participate.

Conservation practices vary region to region, even mile to mile. Mark Keast

Timestamp 1/9/2013 5:24 PM

Name gary rayhons
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

The State of Iowa needs to adequately fund projects that benefit the states air and water. We need a science-based nutrient reduction stategy that recognizes the important strides Iowans have made in voluntary conservation practices. Along with that, the importance of funding the state's cost share programs that benefit conservation. Past funding problems have greatly delayed much needed conservation projects in the past. As a commissioner for our county soil and water board I have watched the dollar amount spent on conservation funding drop over the years, with limited funding it makes it harder to fund much needed projects that benifit our state's great land. In closing, I ask you to adequately fund the Iowa nutrient reduction strategy and other conervation cost share programs that benifit our state. gary rayhons

Timestamp 1/9/2013 5:41 PM

Name Derek Mullin
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I support a science based state nutrient reduction strategy. Research that is done will be able to guide conservation practices. Properly funding the nutrient reduction strategy is necessary to be successful. On our farm we voluntarily try to do what is right for conservation practices. This includes terraces, waterways, buffer strips, split nitrogen applications and cover crops just to name a few. Derek Mullin

Timestamp 1/9/2013 5:54 PM

Name Larry Harrah
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Out of concern I write you today, I feel we can and need to do a better job of Nutrient Managment in regards to off target contamination. With that said I also feel this needs to be researched to lenghty extents in order to come up with a plan that is the best for everyone (the Big Picture) that this subject affects. If hasty decisions are made with out proper research this will have equally negative affects that I feel don't need to happen. I feel the State should help fund extensive research that will give us the best answers to maximize crop growth but also minimize off target contamination and at this point I don't feel anyone has the right answers. Larry Harrah

Timestamp 1/9/2013 6:09 PM

Name Tye Rinner
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I urge you to support a science based decision on the nutrient reduction strategy, not an emotional decision. If cost share programs exist, farmers just love to add more conservation plans to help the enviroment. I have seen this first hand in my own neighborhood. I have built terraces on my own farm and will build more as funds allow. I am also highly in favor of a volunteer based program as well because nobody like being forced to do things that will cost them money. Tye Rinner

Name Carol Miller
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

As a farm wife, I have experienced the many changing weather events and how it affects the land and surrounding areas where we farmed over the years. The only certainty in the every changing weather events is uncertainty . Farms that had excellent high producing yields could be taken down to its knees [more or less] as millions of gallons of water flowed across it surface taking with it valuable top soil and depositing a sandy mixture of soils along with debris. Years ago our Skunk River farm was a learning experience and provided a wide range of learning opportunities that prompted us to enter into a conservation land exchange program. Conservationists are happy with their acquisition and so are we.

It is because of our experiences I encourage our lawmakers to adequately fund the Iowa Nutrient Reduction Strategy as well as the state s other conservation cost-sharing programs. Iowa s failure to adequately fund these programs in the past has delayed needed conservation projects.

One does not realize all the differences in farming first bottom, second bottom to highly erodible land until you experience it. While there are good opportunities for large harvest yields there is the potential to have multiple opportunities for replant and also crop failure all within the same crop season when you farm river bottoms.

Through the years we have participated in installing grassed waterways, terrace repairs and also filter strips next to several creeks. Conserving our land is the only way of farming it. Once your soil leaves the farm it belongs to someone else. Best Management Practices and Land stewardship is very important to every farmer and I fully support the opportunities to cost share expenses in different programs offered. I would also like to encourage Iowa to continue their cost share conservation programs and continue to increase the amount of available monies. Demand for funds has exceeded the availability of funds available by over $100 million last year which demonstrates that Iowa farmers are willing to do more. However those cost sharing funds need to be guided by the Iowa Comprehensive Nutrient Strategy.

Iowa s farm land has hundreds of different soil types covering millions of acres of land with varying topographic levels from flat first bottom to highly erodible and as different corner to corner, east to west and north to south as imaginable. Neither farm is the same as the neighbors yet all greatly valued by their owners. As many Iowa farms are family owned, passed down to next generation or just recently purchased much can be learned from their owner who has walked the land, inspected each acre and invested in its maintenance and will tell you it s good dirt . Carol Miller

Timestamp 1/9/2013 6:44 PM

Name Dan Shore
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Let's let the farmer do the conservative practices and leave the others out of it Dan Shore

Timestamp 1/9/2013 6:47 PM

Name Bill Couser
City nevada
State Iowa

Providing comment on the following sections:

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

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as a farmer-cattle feeder in this state, our family understands the words environment, sustainability and conservation. Every day we practice these words and many more on our farm. As a farmer why would i ever want to put something on my land that would run off. it has to do with economics and when we apply we want to use it all. we don't need more regulations and laws and will help even our neighbors to understand what this really should mean to us if it is kept voluntary and not mandatory. mandatory always brings a cost. our family will continue to spread the word and what we need to do.

Timestamp 1/9/2013 6:54 PM

Name Peter Wicks
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am a farmer in Dallas County, Iowa. With my own money and equipment I have built and installed many waterways and other conservation practices over the years to protect Iowa's waters. These were done voluntarily, not because some government agency was forcing it down my throat.

I urge you to support voluntary means like the Iowa Nutrient Reduction Strategy to help with water quality. Government "one size fits all" mandated practices only generate hostility. This is a well thought out and researched plan.

Please support funding for this program as well as other conservation cost-share programs. Peter Wicks

Timestamp 1/9/2013 7:11 PM

Name Robert Holschlag
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I don't believe that we need more regulation on conservation practices. I do believe we have some great practices in place already. One being the CSP program another the CRP program , great voluntary programs. I am currently involved in both. That CSP program is the best program I've been involved with, it keeps fertilizer usage in line with yields or crop removal. It also addresses timing of nitrogen applications, manure credits,etc. I feel we have some very good programs to choose from. I would like to keep these programs my choice, and not be told what will work best on my farm. Robert Holschlag

Timestamp 1/9/2013 7:26 PM

Name Dustin Sage
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

As a farmer I support a science based nutrient reduction strategy that uses voluntary conservation practices. Voluntary conservation practices have already shown us that they can be both effective and cheaper to implement than a "one size fits all" regulatory approach. By combining voluntary conservation practices with a science based approach I foresee an effective way that we can both reduce the impact we all have on the environment and still maintain the agricultural productivity of Iowa's farmers without more regulations.

Both as a newly elected Soil and Water District Commissioner and as a farmer I see a lot of voluntary conservation projects being done by the farm community, but I also see that the amount of projects that people would like to do exceeds the amount of money available for theses projects. Failure to fund these programs in the past has delayed many of these projects that have the ability to help Iowa achieve the goals set forth in the Nutrient Reduction Strategy. I ask you to fund Iowa's Nutrient Strategy and other state cost-share programs so that we can continue the great work that we have done in cleaning up Iowa's waters.

On our farm we have done a number of conservation practices including: terraces, grass waterways and buffer strips. These practices have been very effective in controlling soil loss. At this point we are also looking into reduced tillage systems and nutrient placement / timing systems that will hopefully help our farming operation and help meet Iowa's Nutrient Strategy in the future. I believe this strategy can work better than any regulation that we put in place, if we fully fund it and give it a chance to succeed. Dustin Sage

Timestamp 1/9/2013 7:42 PM

Name Maurice Johnson
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

As a land owner and farmer I've always been interested in land conservation practices. I've implemented conservation practices based on science to help maintain and improve our farms productivity.
We have used no-till soybeans for about 6 years,improved our waterways to handle rain runoff, installed grass buffers along several small creeks and around all our Karst sinkholes.Newer practices include using strip till on about 60% of our corn acres and split applying of our nitrogen based of off our crop consultants recommendations. We also incorporate all off our liquid hog waste.
New practices that we are looking at is cover crops to protect against water and wind erosion.
It's very important to fund programs and cost share programs to help farmers landowners to implement practices that might work on their farms to help protect the environment Maurice Johnson

Timestamp 1/9/2013 7:46 PM

Name Ash Kading
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

On our farms we have voluntarily built miles of grass waterways with our own funds to save soil and stop the erosive power of water. We have also used scrapers to haul eroded topsoil from low areas to thin sidehills and washouts. Every fall and spring with dry weather we spend weeks working on this soil conserving work. We plan to continue this soil conserving work in the future. We would prefer to continue to pay for it ourselves and have a lower state income tax rate.

We do not need any more regulations in this state. Landowners should be in sole control of what they do on their own land, and that means only voluntary programs and practices. Anything mandatory is not constitutional and would be an attack on private property rights. Iowa farmers and landowners are very intelligent people and are quite capable of determining themselves which practices are best suited for conserving the soil on their farms. Allow them to do that, and they will continue to make the land yield forth its bounty, creating the feedstuffs used in feeding this state, the nation and the world. Ash Kading

Timestamp 1/9/2013 7:52 PM

Name James McCreary
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I support the science based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices that farmers do and will continue to do. James McCreary

Timestamp 1/9/2013 7:55 PM

Name James Hassebrock
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Please support the Iowa Nutrient Reduction Straregy.This plan will show what Iowans can do. Iowans know that if nothing happens then more regulations are coming. One size that fits all will be costly and not work as well. James Hassebrock

Timestamp 1/9/2013 7:56 PM

Name David Hommel
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Please lend your political support for a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. David Hommel

Timestamp 1/9/2013 8:01 PM

Name Russell Kurth
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

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

I make my farm managements decisoins based on sound science. That is the way we should implement the nutrient reduction strategy. Sucessfully implementing the program will take a lot of on farm research and a lot of information and eduction.

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

Timestamp 1/9/2013 8:17 PM

Name Eric Monson
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. I urge you and other state lawmakers to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state s other conservation cost-share programs. Iowa s failure to adequately fund these programs in the past has delayed needed conservation projects.

Conservation is my number priority. I am 100% no-till with my farming practices. I utilitze the government programs: CRP, CSP, etc. to protect the environment as much as I can. We want to protect our soils as that is our livelyhood!

Thank you, Eric Monson

Timestamp 1/9/2013 8:26 PM

Name Stephen McGrew
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I would like to urge you to support a science based state nutrient reduction strategy for Iowa. I feel that a voluntary approach will work better than people trying to do minimum legal requirements.

I feel that it will be necessary to help fund some of these practices like you have in the past.

On our farm, we have been implementing many conservation practices. These include, no-till, terraces, cover crops, nutrient VRT prescriptions, and auto boom shut offs. Stephen McGrew

Timestamp 1/9/2013 8:32 PM

Name Brent Naeve
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I feel the Iowa Nutrient Reducetion Stratagy is good plan. Being science based is important, the reasearch has been done to show the outcomes meet the goals. I also think that being voluntary is important, we all are more likely to do more than what is asked when it is our option, rather than when required, we do the minimum only.

As a fifth generation Iowa farmer, I always work toward leaving the land I am responsable for, better then when I started. I use grass waterways, filter strips and residue management to limit soil and nutrient loss.

Please support this program with your vote and also funding. As always limited funding limits the results. Brent Naeve

Timestamp 1/9/2013 8:56 PM

Name Michael Ugulini
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Please support nutrient reduction voluntary control. I as a farmer do the best possible to protect the ground I farm because it is my lively hood. If I don,t protect it it won.t be here for future generations to help feed the world. Thanks Mike Ugulini Michael Ugulini

Timestamp 1/9/2013 8:59 PM

Name Larry Kinsinger
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

As the owner of farmland in Iowa, I have a desire to maintain the soils and water the are a part of this farm. I think most farm owner have the same concern as I do. The financil responsible thing to do is to maintain, to the best of our ability, the resouces we are using. Therefore many farming practices are used on a voluntary basis without needing governing oversite.

I have installed terraces on my farm in order for the neighboring farm to build working terraces to protect both farms soil and water. I did not need the structures the my farm but in order for the neighboring farm to get them built, I needed to control the water through inlet structures on my side of the fence. While funding help was provided, the idea and implitayion was based on on our own desire to protect our ascets. Larry Kinsinger

Timestamp 1/9/2013 9:10 PM

Name Larry Kinsinger
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I apolgize for the email on the nutrient reduction issue. The spell check did not work and I know I did not spell everything correctly. I think the email was sent without correction. Thank you for your time trying to understand what I meant to say. Larry Kinsinger

Timestamp 1/9/2013 9:11 PM

Name Birgitta Meade
City Decorah
State Iowa

Providing comment on the following sections:

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

Voluntary guidelines for industrial agriculture?? Get real. That's what got us in to this mess that poisoned our neighbors to the south. There need to be some teeth in these regulations because all the land stewards I once new were purged from farming by get rich quick crooks. Pleading with the polluters to be good boys has not worked so far. They don't care about fines. Polluters who steal the health of their neighbors are thieves. Thieves should be incarcerated to protect the public.

Timestamp 1/9/2013 9:12 PM

Name andy hora
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am writing to urge you fund the Nutrient Reduction Strategy and to provide more funds for conservation cost share.
We have built terraces,grassed water ways,and creek buffers. There is never enough cost share to complete the projects that we will do.
We also notill our land and have just started using cover crops. We have started the ball rolling in the right direction. We need your help to keep it going.
Please fund these conservation programs. andy hora

Timestamp 1/9/2013 9:23 PM

Name Timothy Dillon
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

As a young Iowa farm family, I would like to take this opportunity to encourage you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state s other conservation cost-share programs.

I believe that a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices is the best way to protect Iowa's environment and the next generation of Iowa's strong agriculture. Timothy Dillon

Timestamp 1/9/2013 9:38 PM

Name Tim Runyon
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

We in southern Iowa do not have a lot of top soil to spare. I have put in lots of tile and terraces voluntarily. They help my land, increase value, increase profits and keep the soil in place. Most people will try to help themselves especially if the government puts in some funding to ease the financial burden. But these laws must be science-based and have some merit. Tim Runyon

Timestamp 1/9/2013 9:45 PM

Name Tom Head
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

As many as you to take a position on reducing run off and nutrient management within the state. As with many requests of your actions, I encourage you to respond using science based logic and not the emotionally charged logic that some might suggest. Farmers and consultants know that is in their best interest to care for the land and act as good stewards. IDALs along with Iowa Farmers are best suited to identify practices, and watersheds to protect the waters of the state. To encourage these right actions, studies, and demonstrations requires funds for cost share and educational programs. Please keep this in mind as budget decisions are being made. tom

Timestamp 1/9/2013 9:48 PM

Name Todd Blum
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am writing this email in support of the Iowa Nutriant Reduction Strategy, a science based plan that employs voluntary conservation practices with the need to maintain agricultural production.

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

Conservation is a constant process. Farmers know if we take care of the land, the land will take care of us. Personally we use conservation practices such as no-till, buffer strips, headlands, waterways, terraces, crp, crop rotation, and planting on the contour. Todd Blum

Timestamp 1/9/2013 10:01 PM

Name Paul McClain
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

i believ this is an excellent program and needs to be pushed on to further oints due to all the chemicals that farmers are using now days in making better crops. Therefore we need to keeps those chemicals out of our livestocks watering systems as well as our own water. Paul McClain

Timestamp 1/9/2013 10:54 PM

Name Randy Heitz
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Today, I am writing to let you know that Iowa NEEDS a voluntary system to further enhance our states conservation resources.

Volunteerism works. It's been a standard means of accomplishing things in our state. School boards, fire departments, etc. I have volunteered to promote conservation practices on our land by installing a farm pond to catch run off water and also incorporates a dry hydrant for fire protection in rural Floyd County midway between Charles City and Rockford. I cooperated with Trees Forevever, in putting land in a buffer strips around the pond. In addition, I planted over 3000 trees on both CRP and non-CRP ground to further restrict soil movement.

We don't need regulations. We need a voluntary system that is fully funded and scientifically based. Randy Heitz

Timestamp 1/10/2013 4:31 AM

Name Larry Boeck
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

We need the support of voluntary conservation. Larry Boeck

Timestamp 1/10/2013 5:11 AM

Name Brandon Beenken
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

There has been a lot of discussion on the Iowa Nutrient Reduction Strategy and as an Iowa farmer I am concerned. I feel that to have a program like this be successful it will need to be adequately funded. I know that with all the budget talks and cuts that putting more money into programs can be a challenge but here is one place that counts.

The strategy that lawmakers take needs to be science based with high importance placed on voluntary conservation practices. Maintaining agricultural production also needs to be considered for this program and its effects on other Iowa affairs.

Being an Iowa farmer I take pride in the conservation practices used on our farm to protect the soil for the today and the future.

Thank you for your consideration. Brandon Beenken

Timestamp 1/10/2013 6:18 AM

Name David Irwin
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am writing today to encourage you to support science based state nutrient reduction. We also need to use this information to promote voluntary conservation practices that are based on this information. We do not need to further burden our economic strength by passing more laws based on emotion that only encourages more regulators hired and no results. Please put funding in place for cost-share programs to promote voluntary practices.
We as farmers are for the most part are stewards of the land. For example, I participate in the CSP program. With cost share, I have been no till farming for several years. I have buffer strips and have installed waterways. We install terraces and tile to slow water flow and keep the soil in place. Keeping soil in place keep nutrients in place.
Farmers are more than willing to participate in nutrient management. Research to reduce nutrient application without reducing yields will increase profit margins, and reduce water contamination. Providing information and cost share to help farmers implement these conservation programs will prove to have successful results. David Irwin

Timestamp 1/10/2013 6:41 AM

Name Keith Dexter
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I sincerely believe that using science to target the best approaches in the most practical areas makes the most sense when compared to one size fits all regulation from the federal government.

Nutrient Reduction strategies, implemented locally and voluntarily on the most vulnerable land and watersheds have been proven to work in the past in different areas across the state. Coordinating efforts statewide, while measuring progress and reporting to the public seems like the most reasonable way forward.

I believe that Iowa farmers, when presented a practical plan that makes scientific sense while still allowing for viable agricultural production will voluntarily choose the right path 95% of the time. That is why I urge you to fund Secretary Northey s request to implement this strategy statewide.

To emphasize, I believe the key to voluntary implementation is statewide local coordination. If someone local comes to me because I am in x watershed in x soil type using x farming method and explains that using y farming method will drastically reduce nutrient entry into our streams and the Gulf of Mexico, I am likely to implement a plan, working with this local expert. I am likely going to keep my food production levels high as well.

If a federal agent from the EPA comes to my farm and forces me to implement some plan that was developed in Washington DC by an expert who grew up in a different state and doesn t understand modern production practices, it is likely that food output from my farm will fall, along with the value of my land. It is also very questionable that the practice mandated by an un-accountable federal agency will reduce nutrients either. Keeping the power to reduce nutrients with the individual and the local expert will have better results every time.

On my farm, the most important practice I have implemented has been using a finishing disk that would be considered a secondary tillage tool in place of more aggressive tillage practices in the fall on highly erodible land. This practice levels stalks while sizing residue and shows a little bit of black soil on the surface allowing for much faster warm-up in the spring. The key is to not tear out the root-balls of the previous year's crop. This does an excellent job of keeping soil in place. Many years, no tillage pass is needed in the spring, even when growing second year corn.

I have also been spreading dry phosphorus and potassium with variable rate technology for many years. Within the next five years, I plan on implementing technology that allows for variable nitrogen application during side-dressing. This puts more nitrogen where it is needed, closer to the point of crop utilization, while allowing me to save money by reducing application rates where the marginal cost exceeds my marginal return.

The key to making this strategy work is to keep the strategy voluntary, allowing for local innovation, while utilizing the state of Iowa s ability to coordinate and educate. Keith Dexter

Timestamp 1/10/2013 6:45 AM

Name Aaron Fopma
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am a farmer in north central Iowa. I enjoy recreational use of water around me and am very interested in maintaining high water quality.

I support a strategy for nutrient reduction that is based on science and I support voluntary conservation practices that will benefit the environment and not reduce agricultural production.

I am asking you to fund the Iowa Nutrient Reduction Strategy. Aaron Fopma

Timestamp 1/10/2013 7:13 AM

Name Douglas Caffrey
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

We need to keep the voluntary conservation practices for the need to maintain agricultural production. When these practices are law people aiways look for ways not to conform. I urge state lawmakers to fund the Iowa Nutrient Deduction Strategy and all other conservation cost-share programs. Douglas Caffrey

Timestamp 1/10/2013 7:13 AM

Name Steve Hofmann
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

As a farmer and conservation contractor, I ask that you fund the conservation cost-share programs as well as the Strategy for Iowa Nutrient Reduction so any decisions can be made based on true scientific facts as opposed to emotional impulses. On all of my acres run-off is controled by both terreces and tillage practices. Terreces are so costly, that without cost share, many that are needed would not be constructed. Most farmers want to know they are doing all they can to be good stewards of the soil and nutrients. Sound science and cost-share will help to ensure that. Steve Hofmann

Timestamp 1/10/2013 7:28 AM

Name James Flinspach
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Please support and fund the Iowa Nutrient Reduction Strategy. There is a great need for a science-based state nutrient reduction stratgey.
This strategy recognizes the importance of voluntary conservation practices.
We have built several structures on our farms and would fund more of them if there was more cost-share money for these projects.
I believe the carrot and the stick are much better incentives for these projects than the stick alone. James Flinspach

Timestamp 1/10/2013 7:39 AM

Name Betty Anderson
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Iowa farmers need a science-based state nutrient reduction strategy. We want voluntary conservation practices

We don't need more regulations. We need more funding. Betty Anderson

Timestamp 1/10/2013 8:37 AM

Name Linda Herman
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Please fund the science-based state nutrient reduction strategy that is based on voluntary conservation practices & need to maintain ag production. This program will put Iowa ahead of the curve, instead of bowing to EPA. Sec. Northey's work to provide a proactive plan is a good one.
We also need funding for the state's other conservation cost-share programs. As one of the Harrison County Soil and Water Conservation District's Commissioners I know we always have more people wanting to do conservation work than we have cost share dollars to help make it happen. Linda Herman

Timestamp 1/10/2013 8:48 AM

Name Jason Dahl
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

As a 35+ year farmer, I urge you to support the Iowa Nutrient Reduction Strategy that has been developed by IDALS, the DNR and ISU.

This is a science based strategy for nutrient reduction and not a one size fits all plan that involves more unnecessary regulations such as have been forced on farmers on the east coast.

I also urge you to adequately fund this science based Iowa Nutrient Reduction Strategy.

We are already over-regulated with plans that have nothing based on good science. Jason Dahl

Timestamp 1/10/2013 9:07 AM

Name Robert Ritscher
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

i am on the soil conservation board and very awere of working to save soil and nutrients soil [land] and nutrients are expensive the proublem with is one size does not fit all the weather,soils,conditions are all variable mandates are rigid education plus voluntary works best no till is increasing does not work every where every year cover crops are starting to be used more in places they are very effective soil conservation has more poeple applying for costshare conservation practices than there are funds available Robert Ritscher

Timestamp 1/10/2013 9:11 AM

Name Robert Casterton
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I support the nutrient reduction strategy recently announced by Governor Branstad. Two key points are that solutions are based on scientific study and adopting solutions is voluntary. First, research and study with a science base will help develop solutions that work and last. Second, voluntary efforts with some incentives gives landowners a stake in the solution, and in my opinion, has a greater chance at being successful. On my farm, we have added waterways and filter strips over the last 15 years. Both have helped to significantly reduce erosion and runoff. We are also minimizing tillage, and have gone to applying nearly all of our nitrogen after the crop emerges, reducing loss and runoff from fall and early spring applications.

This initiative will require funding to implement, and I ask that you provide this funding. Robert Casterton

Timestamp 1/10/2013 9:18 AM

Name Shelly Toppin
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

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

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

Share voluntary conservation practices you ve already implemented and those you hope to implement in the future to benefit your farm and the surrounding environment. Shelly Toppin

Timestamp 1/10/2013 9:25 AM

Name Nicholas Podhajsky
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

It seems Iowa agriculture is constantly under attack from regulators regarding environmental issues. The science quickly becomes politicized, and the true nature of the discussion is lost.

The Nutrient Reduction Strategy is a science based approach to proactively address practices that Iowa farmers use in production agriculture, and evaluate the environmental impacts that result from those practices. It allows for voluntary participation, however, successful farmers are those that are good stewards of their resources and only spend money on usable fertilizer and productive tillage trips. The days of over fertilization and recreational tillage have passed.

I ask you to support the funding of the conservation budget, and in particular the Nutrient Reduction Strategy. Nicholas Podhajsky

Timestamp 1/10/2013 9:30 AM

Name Steven Riesselman
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

In order to maintain the agricultural production in the state of Iowa, it is important to have voluntary conservation practices.

Adequate funding for the Iowa Nurtient Reduction Strategy, and the state's other conservation cost-share programs, will help to reach this goal.

I have farmed for over 40 years, using smart conservation practices such as; headlands, buffer strips, no till planting and CRP along waterways. I plan to continue these things, and I am willing to listen to any other suggestions to preserve our land for future farming generations. Steven Riesselman

Timestamp 1/10/2013 9:33 AM

Name Skott Gent
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I just wanted to again voice my support for the use of science-based information when constructing Iowa's nutrient reduction stategy. I also urge you to make sure to fund this and other conservation cost-share programs.

Cost-share programs have helped me immensely in constructing numerous conservation practices on my farm, and if properly funded will continue to incentivise farmers to voluntarily do more to help clean up the State's waters. Skott Gent

Timestamp 1/10/2013 9:41 AM

Name Richard Gansemer
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Please support and fund the iowa nutrient reduction stragedy,as well as the states other conversation cost-share programs.Most of us farmers in the area already use mininum till,grassy waterways, and border strips along streams.We are already taking care of the soil.Thank you.
Richard Gansemer

Timestamp 1/10/2013 9:44 AM

Name Dena Morgan
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

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

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

On our own farm in the past three years, we have built more terraces, repaired terraces that were failing and seeded waterways. We have rebuilt ponds and repaired washouts in pastures, being mindful to reseed any areas where dirt work has been completed. We understand the importance of preserving the land and implementing these vital conservation practices.

I thank you for your consideration on this matter. Dena Morgan

Timestamp 1/10/2013 10:14

Name Ron Kilburg
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I believe a science-based NRS should voluntary and be publicly promoted to agriculture to get buy in. The nutrient reduction stategy should have a cost benifit analysis done to it and the cost positive benifits should be publised . Those practices should be funded by conservation program dollars help with vouintary implimentation.

Farmers I know continue to impliment conservation

practices to into fit their spicific farming operation. We've implemented no-till,contuoring,crop-rotations,cover-crops ,settling basins ,filterstrips grid-sampled nutreint analysis recs. and will continue to implement new practices that fit our operation.

I believe we can obtain goals vountarilly, both state and national. Ron Kilburg

Timestamp 1/10/2013 10:20

Name Gene Sievers
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am writting this letter to encourage you to support and fund the Iowa Nutrient Reduction Strategy, and other conservation cost-sharing programs. I feel that science based nutrient reduction should be voluntary through conservation practices that farmers use.
I already use conservation practices such as; reduced tillage, reduced chemical use, spring applied fertilizer, and other practices to reduce runoff. Many of my neighbors have change their ways also.
Please support the Nutrient Reduction Strategy. Thank you. Gene Sievers

Timestamp 1/10/2013 10:32

Name Seth Wengert
City
State Iowa

Providing comment on the following sections:

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

1- Why is Agriculture the only addressed source of non-point source pollution addressed in the report? By ISU s own admission there are other non-point sources that have not been addressed in the report. ISU cited erosion of stream banks containing legacy phosphorus buildup as one other major source. It appears that agriculture is being singled out. How can any significant reductions be achieved if ALL sources are not addressed and the burden of reduction be unfairly laid on just a few sources.

2- With regards to the valuation of land that is to be taken out of production for buffer strips and wetland, it is being under evaluated by the report and is lowering the cost of implementation. The report used ISU average cash rental rates as the cost to take land out of production. However farmers and landlord will tell you that the ISU rental rates are low and do not reflect the going current rate for farmland rental. Plus on top of this low rental rate being used, the report failed to account for the lost profit potential on those acres taken out of production.

3- The report suggest that part of nitrate run off reductions could be achieved using the Iowa State University Extension Nitrogen rate calculator to determine the Maximum Return to Nitrogen(MRTN). It is unrealistic to expect farmers to reduce the nitrogen application rates to what amount to a rate for an average yield. After all average yields are set by the extremes, both high and low. Farmers have to apply fertilizer for the maximum crop yield possible in order to feed the world and be competitive in the market place.

4- The report appears to partially ignore point source pollution. Why does it affect only the 130 largest point source polluters? If we us this same logic for non point-source polluters then should this report only affect the 130 largest farmers in the state? Yet it seems that this report is intended to be a guide for ever farmer in the state. Point source and non-point source polluter are not being held to the same standards. It is much easier for the point source polluters like municipalities to implement changes because they can bill their customers directly for the new costs incurred. Farmers cannot do that!

5- Regardless of which set of management practice changes would be adopted from the report to be used to reduce non-point phosphorus and nitrogen run off to the desired goals, the cost is staggering. There is no way that farmers can be expected to use any of the suggestions from this report if they are ultimately expected to bear the costs themselves. In a more average farm economy that has substantially lower and more normal profit margins, the costs of these new practices could actually be the difference between a loss or profit on a lot of operations with a rented land base. If the public feels that non-point phosphorus and nitrogen run off is a concern then they will have to be willing to pay increased food costs at the grocery store.

Timestamp 1/10/2013 11:08

Name Barbara Prose
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

You have a wonderful opportunity to help improve and maintain Iowa's water quality by adequately funding the Iowa Nutrient Reduction Strategy. By supporting this and other conservation cost-share programs you will be supporting a science-based state nutrient reduction strategy not ones that are emotionally based causing hardships on the people who own and have worked the land.

Farmers know their land and have some rather ingenious ideas - ideas not often thought of by someone sitting in an office. It is very important to have voluntary conservation practices that enlists the help of the farmer landowners.

Iowa needs to improve water quality plus maintain our agricultural production which brings millions in state revenues. I believe funding the Iowa Nutrient Reduction Strategy and cost-sharing programs are an economical way of doing both. Barbara Prose

Timestamp 1/10/2013 11:14

Name Jerry Shepler
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I live on,own and operate a small 210A farm in NW Warren County. North River and 2 substancial creeks run through this farm that has been in my family since 1946.

Permanent pasture, cattle, buffer strips, ponds, contouring,reduced tillage and terraces have been part of the practices carried out through the decades of our ownership.Some practices(terraces) were helped by cost sharing and some because they were the right thing to do. We learned this through educational activities. The first conservation practice I can remember being advocated by ISU and conservation groups was contouring and strip crop farming. These practices were adopted voluntarily because educational efforts showed the benefits.

I urge water quality protection efforts continue to be voluntary, using education and cost sharing on qualified, approved projects.

Jerry Shepler

Norwalk, IA Jerry Shepler

Timestamp 1/10/2013 11:38

Name Matt Siefker
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

It is very important for the future of Iowa that we take a science based approach to for our Nutrient Reduction Strategy. I support IDALS and the DNR conservation plan. Every farm operation is utilizes different management practices that best suite their operation and soil types. Individual farmers have far better knowledge of their land than someone sitting behind a desk in Washington! Some of the things that I do include filter strips along all waterways, IPM pest management, spring applied Nitrogen and incorporation of fall applied P & K. IOWA can do a much better job than the EPA! Matt Siefker

Timestamp 1/10/2013 11:46

Name Al Schafbuch
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I farm in north west Benton Co. by Dysart. I started to use NO TILL in 1992 on land that is not highly erodible. I also use variable rate fertilizer and lime application.
I support a voluntary science biased state nutrient strategy that has cost share payment to get farmers started using the conservation practices needed to keep the fertilizer and soil on all farmer farms.
No till works great for keeping phosphors on my farm as it moves with the soil and I have very little soil moving. I have also stabilized the creek banks on my farms by sloping back the soil and getting grass to grow or by using old broken cement to stop erosion of stream banks.
There need to be some credit for the conservation practices that have been used for the last 10 years, as the water is getting cleaner each year. Al Schafbuch

Timestamp 1/10/2013 11:47

Name Vincent Leners
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am asking that you support a voluntary, science and technology based approach to improving waster quality. Thank you Vincent Leners

Timestamp 1/10/2013 12:49

Name Russell Miller
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Iowa farmers do a fantastic job of implementing conservation into their farming operations. I support a science-based state nutrient reduction strategy that will incorporate the use of voluntary conservation practices. I want to leave my farm in better shape than when I started farming.

Please make sure the Iowa Nutrient Reduction Strategy and all other conservation cost-share programs are adequately funded. These programs help us keep our land in top shape allowing us to lead the nation in production. In past years funding for conservation programs may have run short delaying some conservation projects.

We have put in miles of terraces on our farms using cost-share programs. These conservation practices have helped control erosion tremendously and we couldn't have done it without cost-share programs. We all need to work together to protect our land. Russell Miller

Timestamp 1/10/2013 1:49 PM

Name Matthew Bormann
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I think the voluntary plan will work. On our farm we are in year 2 of strip till for about half of our acres. The other half gets manure with conservation tillage. With new technologies such as, auto steer, GPS, and encapsulated urea nitrogen we have been able to cut back our nutrients and place them about 8" deep. At 8" that is right in place for the roots better utilize the nutrients. With a good tractor and auto steer you can plant right over these strips.

Also we have been installing more grassed waterways to filter surface runoff. There are many fields in this state that could use more water ways.

I feel where I live in Kossuth County if everybody would do a timelier job with placement of nutrients and have a better plan of what to put on in regards to crop yields and soil tests it would help.

Getting things black with tillage has been a recent fad in our area. Cutting back on tillage and better utilizing residue managing equipment with the planter would hold soil in place and cut the amount of down stream sediment and pollution during rainfall. Heavy tillage is big, especially with the amount of money people have made in recent years. More tillage does not equal better yields. Better management helps the environment and increases profits.

Sincerely,

Matthew Bormann Matthew Bormann

Timestamp 1/10/2013 2:02 PM

Name Dona Mae Matthiesen
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Please fund the Iowa Nutrient Reduction Strategy along with the state s other conservation cost-share programs. We support voluntary conservation. Dona Mae Matthiesen

Timestamp 1/10/2013 2:08 PM

Name Jerald Crew
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

It's extremely important we support Iowa's voluntary plan to reduce nutrients leaving Iowa. We know best-not some bureaucrat from EPA!
Jerald Crew

Timestamp 1/10/2013 2:12 PM

Name Mark Bohner
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

This program is the 1st comprehensive study worked on by all people involved with water quality. Farmers will do the right thing, provided there is cost share money available. This program will also offer alternatives for different farming situations. One size does not fit all! Please fund this great program. Mark Bohner

Timestamp 1/10/2013 2:24 PM

Name Jay Matthews
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I would like to strongly support this science based voluntary approach for conservation practices. I believe this will encourage farmers to use more conservation practices by rewarding them for adopting the strategies that work on their farm and not being forced into doin things that may be a fit for some but wont work well for others. When this happens the full usefulness of the practice is never realized because the farmer sees it as a job to deal with, not something that is helping him on his operation. I hope that this initative will be adequately funded when it is put in place. A lack of funding will spell doom for this initative and, most likley, end up with the EPA telling us what we need to do and how much the state is going to spend to do it. I don't believe either of those will be good for our great state. I don't think it is a hard to argue that the Nutrient Reduction Strategy is a much better idea for our state than the EPA mandating things to us.

I know most of the farmers that I work with have embraced variable rate technology for their fertilizer applications to allow them to get the most from the fertilizer they apply by only applying the ammount needed in different areas of the field. There are more and more each year that are also adding a nitrification inhibitor to thier nitrogen applications. Not only is it good for the environment but is also protects the farmers investment in their fertilizer dollars.

Again I hope that this initative gets implemented and gets the funding that it deserves to allow Iowa to continue to be a leader in feeding and fueling the world and continue to be a leader in protecting the great natural resources we are all lucky to have. Jay Matthews

Timestamp 1/10/2013 2:25 PM

Name Dan Carpenter
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

The Iowa Nutrient Reduction Strategy is a good common sense program to voluntary conservation practices on Iowa's varying landscapes and soil types. The strategy considers point source and nonpoint source approach to addressing water quality and reduction of nutrients in the water.

Your support of the Iowa Nutrient Reduction Strategy is important to Iowa agriculture. Dan Carpenter

Timestamp 1/10/2013 2:31 PM

Name Jerry Crew
City Webb
State Iowa

Providing comment on the following sections:

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

I strongly support Iowa's voluntary strategy for nutrient reduction. Keep EPA away!

Timestamp 1/10/2013 2:47 PM

Name Neal Keppy
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Please support a voluntary and science based approach for conservation practices. We as farmers don't need a top down system of regulators determining what is best in terms of conservation. Most farmers understand that it benefits everybody to have sustainable agriculture and a productive ecosystem in balance. We have miles and miles of grassed waterways and field borders to help keep soil and nutrients in place. We also use minimum tillage to keep soil stable. thank you for your time and effort on this project. Neal Keppy

Timestamp 1/10/2013 3:17 PM

Name Bryan Mowrer
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I don't believe farmers are against regulations, I believe they are against regulations that aren't science based. We don't want to be mislead on practices that don't work. I think there are farmers that would try some new things on their farms but are afraid of some of the costs involved. I know of farmers who have stopped at the local NRCS office and asked about funding that were put on a very long list. Why not use some of that state surpluss to get that list caught up a little bit" I've been pleased with the waterways that have been installed on my farm. They look great but most of all they really do reduce eroision. I also believe those same waterways I've installed aren't the answer for those with flatter land. Each farm should have their own plan to reduce nutrients from getting into our streams. Bryan Mowrer

Timestamp 1/10/2013 4:51 PM

Name Al Schafbuch
City Dysart
State Iowa

Providing comment on the following sections:

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

I support a voluntary science biased state nutrient strategy that has cost share payment to get farmers started using the conservation practices needed to keep the fertilizer and soil on all farmers farms.

I farm in north west Benton Co. by Dysart. started to use NO TILL in 1992 on land that is not highly erodible. I also use variable rate fertilizer and lime application.

No till works great for keeping phosphors on my farm as it moves with the soil and I have very little soil moving. I have also stabilized the creek banks on my farms by sloping back the soil and getting grass to grow or by using old broken cement to stop erosion of stream banks.

There need to be some credit for the conservation practices that have been used for the last 10 years, as the water is getting cleaner each year.

Thank You

Al Schafbuch

509 Sherman St.

Dysart, IA. 52224

319-476-3727

schafbuch69@gmail.com

Timestamp 1/10/2013 4:58 PM

Name Luke Schuldt
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I believe this program will work to help keep our waters clean. We as farmers in general already do what we can to keep our soils in place and out of rivers and streams. We will continue to implement new science based practices when applicable. Luke Schuldt

Timestamp 1/10/2013 5:08 PM

Name Kipp Fehr
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am writing to garner your support to fund the Nutrient Reduction Strategy that is being proposed in our state. I feel that voluntary action on differant conservation efforts is a much better route than a one size fits all regulation. On my own farm, have reduced tillage on corn stalks and have ended tillage on soybean stubble. I also do not apply any nutrients on my farms that are in the Des Moins river flood plane in the fall. I have also cut back the amount of nitrogen applied and split apply what I do use. I encourage you to help Iowa farmers do their share to reduce the dead zone in the Gulf of Mexico. Also on the same line, farmers are not to blame for 100% of pollution going down our rivers. Soil eroision on creek and river banks is huge as well as city contribution to this problem. Kipp Fehr

Timestamp 1/10/2013 5:11 PM

Name Ronald Miller
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I support the science based state nutrient reduction strategy that is voluntary because I want to protect my own property and others for my own personal benefits. No further force is needed because it would take money out of my pocket and big government only screws things up. I would like to urge my legislators and officials to fund the state nutrient reduction strategy along with other cost-share conservation programs so that we can stay on top of these issues without needing any further interference from big government. In fact, I have already lowered my nitrogen applications while implementing some organic crops into my operation to further reduce any possible environmental contamination. Please do whats right. Support the voluntary state nutrient reduction strategy and fund the conservation cost-share programs. Ronald Miller

Timestamp 1/10/2013 5:12 PM

Name Alan McGaffin
City Sioux City
State Iowa

Providing comment on the following sections:

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

As a resident of Sioux City for nearly thirty years with relatives along the Mississippi River I have crossed the state on as many east-west roads as I can find. In the past several years I have witnessed the removal of many acres of shelterbelts and grass filter strips along creeks and rivers, all for the push of the almighty dollar. Whether the land is hilly and erosion prone or level to gently rolling, the relentless pressure to expand acres and feed the world goes on.

We hear that lost habitat has resulted in the reduction in game bird and other species of bird and animal but don't so easily see or care about the lost soil and the additions of nutrient poisons down stream and to the Gulf of Mexico. Ralph Rosenberg of the Iowa Environmental Council cites a 2011 survey from Iowa State University which found that 72% of Iowa's farmers had spent less than $5000 on conservation efforts on their farm in the previous ten years. And the Iowa DNR really expects voluntary efforts will achieve its reduction goals?

Voluntary compliance from Iowa's farmers and ranchers will never work. It is insulting and incredible that the Iowa DNR would require cities but not rural lands to abide by the law. Require mandatory compliance of both or end all government subsidies and tax base sharing. Mandatory compliance will require inspections, aerial or otherwise. Own up to your responsibilities as the regulatory steward that our future generations need.

Timestamp 1/10/2013 5:15 PM

Name Rex Rhoten
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I support science-based state nutrient reduction strategy. It acknowledges the importance of voluntary conservation practices.

Also, I urge you to adequately fund this strategy as well as other cost-share programs. Rex Rhoten

Timestamp 1/10/2013 5:26 PM

Name Brad Black
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I strongly support a science-based state Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Please adequately fund these programs to avoid delaying much needed conservation projects. Brad Black

Timestamp 1/10/2013 5:37 PM

Name Brad Fetters
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I urge you to support the nutrient strategy if it is based on science and it must include urban areas as well, farmers can't be held at fault when the urban centers have no restrictions on what they can put on yards to keep them lush. All actions must be kept on a voluntary basis or I believe there would be great resistance and cooperation.
So again I urge you to support and adequately fund conservation cost share programs to put Iowa on the front of the line in conservation practices.
I personally have used some of the practices to use on my farm with paddock fencing and structures to stop runoff.

Your support is greatly appreciated Brad Fetters

Timestamp 1/10/2013 5:41 PM

Name Carl DeJong
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I would like to urge you to support a scienc based nurient reduction strategy for iowa I think it should be a voluntary program as that always works better than and is easier to implement than a mandatory program. you need to fully fund the nutrient reduction stragedy .it is also important to fund the conservation cost share programs Carl DeJong

Name Jeffrey Pape
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I have been the Chair person for the Hewitt Creek Watershed Project for 7 years. We have done exactly what this project is talking about, our extremely diverse terrain, soil types, and types of livestock operations is a perfect test for this type of program. We have shown that you can get volunteers by giving them the correct amount of education towards the differences in their practices, and allowing them to make the right choices. We are stewards of the land and most of the farmers will always make the right choice to better their land.

You will never get all of the people in a voluntary type program, however you will get the ones that can make the biggest difference for you. The ones you don t get, likely are not following the rules already. This has been our experience, but we have approx. 75% of the farmers in our 23,000 acre watershed participating. Take note, this is with only small incentive payments to get them involved. Again once you educate them on how they can improve they make the right decision on their own. It is the nature of most farmers to want to do a better job always, and this includes Nutrient management. A one size fits all does not work, we have proved that even in our small watershed we need different issues addressed from one area to another. This type of program allows that flexibility.

I hope and pray you will support this voluntary method of conservation. This is how you WILL get the most bang for your money. We have shown we can install waterways, headlands, etc. cheaper and with less pushback from landowners. Nobody likes to be told what they have to do on their property, but give them the idea and an incentive and watch the projects grow!

We are completely no-till on our farm, we have a grade stabilization structure, headlands, water ways, Riparian buffer along a creek, and we do cover crops and love showing people how well all these practices work. We can prove the improvements benefits to anyone. So yes I believe in this system because I know it works, and believe others have seen the same based on Hewitt s success. Jeffrey Pape

Timestamp 1/10/2013 5:43 PM

Name Michael Becker
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

We need a state nutrient reduction strategy, That knows how important voluntary conservation practices are.!
Lawmakers need to fund the Iowa Nutrient Reduction Strategy as well as other conservation programs.!

We started to apply anhdyrus ammonia in the spring time and put in buffer strips in. Michael Becker

Timestamp 1/10/2013 6:01 PM

Name Jon Zirkelbach
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I would like to ask for your support for the Iowa Nutrient Reduction Strategy and allow farmers to voluntarily participate in conservation practices. I currently use reduced tillage, contour planting, maintain grass waterways, CRP buffer strips, and no-till planting which reduces runoff into our local water sources. With your support farmers would be allowed to make best practice decisions based on the needs of each individual farm. Someone sitting behind a desk and not working on the farm is the person who usually doesn't always see the best solution when it comes to the practices needed to maintain a high standard of farming while producing a high quality product at the same time. Jon Zirkelbach

Timestamp 1/10/2013 6:15 PM

Name John Moritz
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Hype, over reaction, blowing out of proportion. Let us use science based knowledge and common sense to allow Iowa farmers to apply the practices that will help us reduce the loss of topsoil and nutrients.

We know what we need, but cost share to slow the loss of soil benefits all stake holders. We need you to fund those programs that benefit us all. John Moritz

Timestamp 1/10/2013 6:21 PM

Name Kevin Krumwiede
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I think that proactive approach to science-based nutrient reduction is the best approach. When it is based on science, end results are hard to dispute. Keep in mind that it is easier to ask a farmer to do the right thing instead of telling the same farmer to do it your way.

One problem that has happened in the past was asking a farmer to participate in a program with the help of financial support then tell that same farmer, after he did his part, that the funds are not available.

Keep in mind that the majority of farmers want to do the right thing. I, for instance, have buffer strips along every drainage ditch I farm beside. I also take the time to split the application of nitrogen. Instead of one application, I make three. Kevin Krumwiede

Timestamp 1/10/2013 6:33 PM

Name Dean Schoning
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

We are asking you to continue to support voluntary water plans. We also ask you to avoid making new regulations. Dean Schoning

Timestamp 1/10/2013 6:45 PM

Name Michael Johnson
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am writing you express my support for voluntary conservation practices through the Iowa Nutrient Reduction Strategy. I believe that the land owners in Iowa are the people who are best able to understand what conservation practices work for their specific circumstances and soils. I believe that it is important that we follow through and continue to fund and support these practices and policies. Michael Johnson

Timestamp 1/10/2013 7:26 PM

Name Eric Sage
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Iowa farmers for some time now have worked to ensure that the nutrients they apply are fully used by their crops. It's a matter of economics. These nutrients cost to much to waste. Science-based reduction strategies and voluntary compliance are necessary components to the entire reduction process. Improving water quality is important to everyone. For this reason it is critical that we adequately fund the nutrient reduction strategy as well as other cost sharing programs for conservation. Farming is what makes Iowas economy one of the strongest in the nation. Common sense solutions not draconian rule making will do the most to improve our water resources. Farmers stand ready to do their part.
Eric Sage

Timestamp 1/10/2013 7:39 PM

Name Shane Smith
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

We are asking you to support the Iowa nutrient strategy. I ask that you fully fund this. I already do conservation practices on my farms and will continue. Shane Smith

Timestamp 1/10/2013 7:39 PM

Name Joe Golinghorst
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I support this science-based nutrient reduction strategy plan and would strongly urge you to support it with me. This plan is proactive instead of reactive, but we need your help to adequately fund this nutrient plan. Joe Golinghorst

Timestamp 1/10/2013 8:52 PM

Name Nicholas Burley
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am writing to support a science-based nutrient reduction strategy. I also believe we should start with a voluntary program that uses cost-share arrangements with state and federal agencies

If you drive around Calhoun County you will now see grass buffers surrounding most drainage ditches and streams where ten years ago we farmed right up to the edge. This is a great example of farmers and conservation agencies working together voluntarily. Nicholas Burley

Timestamp 1/10/2013 8:58 PM

Name David Kamm
City Decorah
State Iowa

Providing comment on the following sections:

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

Iowa' failure to ensure clean water is a disgrace. As Paul Johnson recently told me, "We've known for 25 years what the problem is." While we may have made some progress during that time in point source pollution, our elected officials and state commissioners lack the political will to tackle nonpoint source (i.e. agricultural) pollution. Instead, we continue to compromise water quality, and by extension, public health for fear of inconveniencing those who think only of profit. Voluntary compliance for polluters has never worked, and thinking it will now be the most effective way to deal with nonpoint source polluters is not a "strategy," but a pipe dream. And that pipe is spewing nutrients directly into our water. The new plan is disappointing at best, and a sham a worst, since much of it fails to force polluters to take measures that would actually address the source of the problem. The fact that the EPA had to sue the state to do anything at all is absolutely embarrassing. In too many ways, our response appears to be the minimum required to avoid litigation. Shame on the state of Iowa for failing to be good stewards of our most valuable resource.

Timestamp 1/10/2013 9:12 PM

Name Kary Becker
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I realize the importance of soil conservation of our soil for future generations. I support a science-based nutrient reduction strategy and voluntary conservation practices.

I ask you to fund the Iowa Nutrient Reduction Strategy and also other conservation programs.

We have terraces,waterways,contour farming, no-till and grass strips along our creeks as some of the conservation measures on our farm.
Kary Becker

Timestamp 1/10/2013 9:19 PM

Name Ben Albright
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am encouraged that Iowa has chosen to address Iowa's water quality issues by creating a Nutrient Reduction Strategy. Water quality should be important to all Iowans.

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

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

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

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

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

To help myself and other farmers continue to protect Iowas water and improve upon what we are already doing, I ask that you choose to fund Iowa's Nutrient Reduction Strategy and continue to fund current conservation and cost share programs such as EQIP.

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

Timestamp 1/10/2013 9:27 PM

Name Valerie Plagge
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Please support the Iowa Nutrient Reduction Strategy, which outlines a science-based approach for reducing nutrient loads discharged from the state s largest wastewater treatment plants, in combination with targeted practices designed to reduce loads from nonpoint sources such as farm fields. This is the first time such an integrated approach involving both point sources and nonpoint sources has been attempted.

Iowa's farmers are continually making improvements to the environment through new and updated conservation practices. Farmers are always looking for the best-management for their farms. The Iowa Nutrient Reduction Strategy gives Iowa's farmers tools to make those decisions for their farms. Valerie Plagge

Timestamp 1/10/2013 9:33 PM

Name John La Fratte
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I strongly support conservation praCTICES BE DONE A VOLUNTARY BASES. John La Fratte

Timestamp 1/10/2013 9:54 PM

Name Ian Plagge
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I would like to express my support for a voluntary nutrient reduction strategy. I think that fully funding a cost share type program that encourages science based practices to reduce nutrient loss is the right way to go about this issue.
Some of the experts I have heard from have expresses concern that the target levels of reduction may not be achievable even if we completely stopped production agriculture. I would urge that until further research can be done to determine what can reasonably be achieved that any plan be a voluntary one that would not place added burdens on America's hard working farm families. Ian Plagge

Timestamp 1/10/2013 10:02

Name Doug Adams
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

The plan for improving Iowa's water quality has been written. Now it is up to you to ensure that the Nutrient Reduction Strategy is fully funded to prove that Iowa's Farmers can make it work.

Every Iowa farmer that I know is doing the best that they can do on their farm conservation wise. Sure there is room for improvement, but new strategies take time to move into main stream agriculture. Voluntary conservation programs are the best way to get conservation on the ground.

On my farm I use no-till and strip-till to conserve soil and improve the efficiency of the fertilizer that I use to grow my crops. This fall I have tried for the first time growing cover crops. If it wasn't for IDALS state cost share program, I wouldn't have taken this first step in trying something new. I was able to get cost share for 62 acres of cover crops, but I went ahead and seeded cover crops on all of my bean stubble this past fall.

I hope to show my neighbors that cover crops do benefit my farm and our environment so that they will possibly try cover crops in the future. I have already talked to several farmers who are interested in trying some next year.

Science based, voluntary conservation practices will work if adequately funded. I will do my part, now can I count on your help" Let's show everyone what we Iowan's can do when we all work together. Doug Adams

Timestamp 1/10/2013 10:06

Name J D Myers
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

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

To make this happen state lawmakers need to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state s other conservation cost-share programs. Iowa s failure to adequately fund these programs in the past has delayed needed conservation projects.

I've already implemented reduced tillage practices, planted buffer strips, enrolled in CRP and hope to implement more practices in the future to benefit my farm and the surrounding environment.

Thank you,

J.D. Myers J D Myers

Timestamp 1/10/2013 10:12

Name Eugene Kenkel
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

We believe that voluntary conservation practices are very important in achieving our goals. Cost share programs have helped us realize some of our goals on our farm. We have previously rebuilt terraces and buffer strips, and just installed a grass waterway this past year. We are believers of no -tilling and have seen the benefits from it.

Costs of implementing conservation programs can be very costly - especially for farmers. It's a two way street, saving our lands is something we all have to work toward. Eugene Kenkel

Timestamp 1/11/2013 4:30 AM

Name David Koopmans
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I would like you to support a science based state nutrient reduction strategy and also we need to keep our agricultural production up. Please also adequately fund the Nutrient Reduction Strategy and other cost share programs to help get needed conservation projects get going. I have put terraces in most of the land I farm and buy manure from another farmer so there is very little water that gets away. We as farmers are always looking for ways to make thing better if possible. David Koopmans

Timestamp 1/11/2013 4:30 AM

Name Rodney Bortz
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

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

I recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

We don't need more laws and regulations. Rodney Bortz

Timestamp 1/11/2013 4:31 AM

Name Daniel Rickels
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

This cooperation between all these groups and FARMERS is the best plan ever! We will get real science-based information in the field, without uncontrolled spending on practices that are questionable or flawed! There is a lot that I did not know about this nutrient reduction until I attended a meeting on it! We could use funding for some of these practices. Last year I finally got ok'd for cost share that I had been waiting for, for several years. There has been water running across and eroding a field of mine, coming off the hiway right-of-way. I paid out of my pocket to straighten out mess on their property-they were to busy till next year! I had a design from ascs to put in French Drain with tile all way to creek and seed new waterway, all was done except the seeding when ascs said they was out of money till next session! I said forget it I'm done. I waited for help with the DOT's water problem for years. I paid for it anyway, and my erosion is now handled! THIS will help with NUTRIENT REDUCTION! Daniel Rickels

Timestamp 1/11/2013 4:31 AM

Name Dan Chism
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

My name is Dan Chism and I am a corn and soybean farmer from Emmetsburg, Iowa. I am also the owner of a commercial truckwash that is no longer in business.

I strongly urge you to use a minor portion of the states ending fund balance to fund Iowa's Nutrient Reduction Strategy and other conservation cost-share programs. In my mind, this is really the first time IDALS, DNR, ISU, and point and non point source polluters are all trying to work together to come up with a solution to try and reduce the amount of nitrates and phosphorus in our ground water.

As a steward of the land, I do everything I can to try and manage any and all leaching or runoff of my nutrients. However, this program goes a step further and addresses some things we are currently not doing or maybe we could do better.

Lastly, as a former owner of a commercial truck wash I can tell you from first hand experience that point source pollution from city sanitary sewers is a huge problem and only getting worse. We need to look into the possibility of trading nitrate and phosphorus credits between ag and municipalities.

I thank you for your attention on this matter and hope you will allow Iowa to be a leader in nutrient management. Dan Chism

Timestamp 1/11/2013 6:22 AM

Name Brady Smith
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

If we don't take care of our farm ground, it will not take care of us. Bottom line. There are bad apples on every tree but trying to regulate all producers for their fantastic conservation strategies doesn't make sense.

It is important to have a science based nutrient reduction strategy that understands the dynamics of different geographies and management practices.

Please consider funding the IA Nutrient Reduction Strategy and more importantly, conservation cost share programs.

I no-till every acre I can along with contour farm our SW IA hill ground. Conservation is an imperative practice on our Heritage Farm. I am proud to be the 6th generation to care for the land, and plan want to leave this farm better than it was when I took over management practices.

Thanks a million for your time. Brady Smith

Timestamp 1/11/2013 6:47 AM

Name Cindy Richardson
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I would like to take the time to share how I think conservation practices should be voluntary and implemented by each state. It has always been a farmers thought how his water supply can stay clean, I know my grandparents always had grass strips around creeks, ponds and feed lots to help with run off. they never wanted to see bad chemicals or waste in that water, it was very valuable to them. My farm today uses a government cost share conservation program on all ground. We have cover crops and grass stripes and head lands this is a good thing, but some people I know see it as losing production, I think it is saving production do to less soil runoff. We need a voluntary program and still need to help find ways to keep agriculture production. Cindy Richardson

Timestamp 1/11/2013 7:17 AM

Name Larry Alliger
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am Larry Alliger. My family and I live on our farm near Gowrie Iowa. Recently, the state released a voluntary water management plan. The Nutrient Reduction Strategy is a science based plan recommended by IDALS and ISU.

Please approve this plan and pass the funding it requires.

Water is very important in our state and should be looked over by our state and not federal regulators in Washington. We use some contuer farming practices, use an integrated nutrient management plan, and many other practices to protect our water.

Please approve the Iowa Nutrient Reduction Stratagy and fully fund this plan. Larry Alliger