Timestamp 1/17/2013 10:22

Name Dean Whitehead
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 you to vote in favor of the Iowa Nutrient Reduction Strategy being proposed by ISU, IDALS and IFBF as they all deal and work to promote soil conservation and water quality. I am a farmer practicing soil conservation in all forms of good stewardship and feel it can be accomplished in earnest. Remember soil and water quality are our dollars invested now and in the future. I ask for your vote for voluntary not mandatory regulation. Thank you! Dean Whitehead, Panora, Iowa Dean Whitehead

Timestamp 1/17/2013 10:30

Name Adam Drewelow
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 a science based state nutrient reduction plan. Farmers are stewards of the land and live off the land; therefore, we take care of it the best way we know how. We do not need a federal or state program with inadequate funding, as such with some of the current programs. Some practices we have done on our farm, include putting buffer strips in along the fields, and waterways in where needed. Adam Drewelow

Timestamp 1/17/2013 10:44

Name Roger Bumann
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I'm completely in favor of science based state nutrient reduction strategy. Iowa farmers are well aware of good conservation practices. We know we have some of the best producing land in the Midwest and have to preserve it to produce enough food for the ever increasing world population.

I myself have miles of terraces, waterways, bufferstrips and headlands. Some of these practices I actually paid for out of my own pocket, I don't always believe in getting money from the government to put in some of these conservation practices.

So, I urge you to support the Iowa Nutrient Reduction Strategy and the other conservation programs. Failure to fund these programs in the past has delayed needed conservation projects. I'm also a commissioner on the local NRCS board and have seen some of the problems with funding.

Thank you for your time.

Roger A. Bumann

Ida Grove, Iowa Roger Bumann

Timestamp 1/17/2013 10:45

Name Vic Rathje
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

i'm sure there are good science based nutrient reduction studies & strategies to voluntarily reduce water pollutuion in the State of Iowa. WE need to adequately fund the Iowa Nutrient reduction Strategy so that we can do the Conservation measures necessary to curb water Pollution.

I have done Conservation Practices on our farmland in Clinton County(but live in Iowa County) with the NRCS & Iowa Dept of Agriculture cost sharing. There has not been enough State Funding in the past to do all the practices that needed to be done.

With pressure from the Federal Goverment to reduce Water Pollution, we need to act on this issue this year.

The volutary approach with adequate funding & scientific researched projects, the State of Iowa can become a leader in Soil Conservation & reduction of Water pollution. Thank you. Vic Rathje

Timestamp 1/17/2013 11:03

Name Chad Ingels
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 the implementation of the Iowa Nutrient Reduction Strategy. It is especially significant that the strategy has identified a voluntary approach as the best way to reduce impacts on water quality. As identified in the strategy, agriculture is an important non-point source of nitrogen and phosphorus losses. The science-based strategy identifies performance levels that can be expected with the different conservation practices.

I have worked with four farmer-led watershed groups that used performance measures to target watershed improvement. Each watershed was successful at attracting high levels of participation (50-75%) by using locally developed incentives based on performance.

These voluntary approaches are the best way to improve water quality but it takes state funding to create the initial incentives so that farmers will try out options. The Iowa Watershed Improvement Review Board is one important option, among others, that needs to be funded so that independent farmer-led watershed improvement associations have an avenue to create their own local incentives. Chad Ingels

Timestamp 1/17/2013 11:17

Name Peter Whitman
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

HI

I think that this is very important becuase land is what we farmers work with and on all day long and we pay more attention to what we put on the soil then people in town do. We worry about every part of the soil. People with out an agriculture back ground dont Care. A farmer is more likely to run a program that he knows will help him in the long run, then one forst on to him. I think that if passed and helped you will see more farmers running these programs. I know I will !! Peter Whitman

Timestamp 1/17/2013 11:38

Name Larry A. Stone
City Elkader
State Iowa

Providing comment on the following sections:

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

Implementation strategy comment

The document glosses over several important things:

1) Most of the causes of the hypoxic zone come from unregulated agricultural sources NOT from highly-regulated point sources.

2) The industrial, fossil fuel-dependent model of agriculture that we ve encouraged farmers to use is destroying the natural capacity of our soil to act as a sponge to reduce runoff and retain nutrients. Alternative, perennial crops should be promoted as one long-term solution to the nutrient loss problem.

3) Decades of voluntary conservation efforts by some farmers have not addressed the problem. When commodity prices have risen, many farmers have chosen to put more land into production, resulting in more nutrient loads entering our rivers. Few farmers have elected to use their extra income to protect the land with better conservation practices.

4) There need to be runoff standards for agriculture and other nonpoint polluters to meet. But the way to meet those standards could be left up to individual landowners. It should not have to be a one size fits all regulation but regulations are needed.

Larry A. Stone

23312 295th St.

Elkader, IA 52043

lstone@alpinecom.net

January 17, 2013

Timestamp 1/17/2013 11:44

Name Robert Hays
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I want to urge you to adequately fund the Iowa Nutrient Reduction Strategy and the state's other conservation cost share programs. Proper funding in the past has delayed needed conservation projects. I also strongly support the science based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices. I feel that this is imperative to maintain agricultural production.

We have already implemented several practices that will help with conservation as well as our profitability. Amoung these practices that we have adopted are no till farming, reducing soil and nutrient erosion, the use of GPS, for the reduction of pesticide ande fertilizer overlap, and split application of fertilizer in the effert to feed the plant what it needs closer to when it needs it. These program implementations will drastically reduce errosion, pesticide and fertilizer leaching into streams or water supplies. Robert Hays

Timestamp 1/17/2013 11:56

Name Charles Albrecht
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Voluntary Conservation works in my opinion. Our farm is notilled, we have grass strips, we farm on the contour and I don't believe we have any soil erosion leaving our farm. Yes, we have been compensated to accomplish these goals, but I would never take them out

I would ask you to please fund additional ways to preserve our land and keep our water clean. Please do not make mandatory regulations, as I believe farmers would then find a way around them and our goal would not be accomplished. We need to continue to keep agriculture growing in Iowa Charles Albrecht

Timestamp 1/17/2013 12:06

Name Peter Bardole
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

We as farmers do not need anymore regulations as we are trying hard to balance feeding an ever growing world in an evivomentaly sound way. I believe much of the time regulations get in the way of doing a better job maintaining the enviroment. We signed up for the CSP program and were penilized for splitting our fertilizer program to apply nutrients before both corn and soybeans instead of just before corn. To many times one size does not fit all.

We no-till our crops and only apply the nutrients need to grow one years crop any further regulations will only penilize our farm. We are always looking for better and more eficient ways to feed the world.

The funding of voluntary programs and farmer inovation I believe will get more done in a quicker time. Peter Bardole

Timestamp 1/17/2013 12:11

Name Trudy Balcom
City Harpers Ferry
State Iowa

Providing comment on the following sections:

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

I do not think there is enough funding or identification of specific actions needed to reduce non-point pollution in this policy document to create any meaningful change for Iowa rivers and streams and the Gulf of Mexico.

Yes, more watershed studies are needed, and ways to identify the amount and sources of nutrient loading in streams. But we already know that most of our waters are impaired. Why not fund incentives for stream buffers, or make them mandatory, or fine people who bulldoze borders. What about rewarding farmers who plant native prairie strips in their fields? ISU studies have shown this practice significantly reduces nutrients too, as well as increasing biodiversity. I don't see any carrots or sticks in this plan, just more of the same. We need to take action NOW! Our state and the Gulf have waited too long. This plan has the tracks of the Corn Growers Association and Monsanto, all over it, and smells like a 1,500 hog confinement manure pit.

Timestamp 1/17/2013 12:33

Name Linda Stoops
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 should be supported for the following reasons.

The strategy was developed by Iowa's own Dept. of Ag, Dept. of Natural Resources, and Iowa State University.

It was developed in Iowa to address the topographical diversity that exists within Iowa's borders. The strategy is based on scientific research that determines what has been an effective practice for each of the various Iowa landscapes.

The strategy is cost-effective and voluntary.

Agri-business in the state of Iowa supports this strategy for nutrient reduction.

Thanks for your support. Linda Stoops

Timestamp 1/17/2013 12:50

Name Chad Means
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I like to say i support science-based voluntary conservation practices to controle nutrient reduction in our water ways. I thank you for you consideration on this matter. Chad Means

Name Michael Holst
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Let me try this again (operator error)
My desire to be more efficient and profitable along with building a more productive soil for future generations are what drive my voluntary conservation efforts.
I have virtually eliminated erosion utilizing a calcium-sulfate based soil amendment which improves both soil-bonding properties and water infiltration along with a rotary aereation vertical tillage tool that maintains soil structure while also improving water infiltration. The waterways we do maintain are there in the event of a heavy downpour. Where it is necessary, tile lines also help improve water infiltration and therefore reduce potential runoff. In the spring, I fertilize with a strip-till coulter system which allows me to be more efficient with my fertilizer use and also helps me build a healthier, more productive soil quicker.
I do these practices voluntarily because of market forces, because I'm trying to be the best farmer I can be and to provde a future for my family.
The reason this cost-share funding is critical is because some farmers farm ground that requires a much higher investment to put the various conservation practices in place. Without question, we have the knowledge to reduce nutrient runoff but to achieve this it will require education and investment. Michael Holst

Timestamp 1/17/2013 1:14 PM

Name Michael Sibbel
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 is based on voluntary conservation practices. I have been no-til farming since the early 80's and I see how it has inproved my land by keeping the soil in the field and not in the rivers and streams.While I have done this at my own cost, I can see the need for a well funded cost-share conservation program is needed for those who can't afford the up-dated equipment,or just need more enticement to implement conservation practices. Michael Sibbel

Name Cindy Bonnet
City
State

Providing comment on the following sections:

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

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

A mega dairy (Traditions Dairy, A.J. Bos owner) in Northwest IL polluted purple leachate into a stream leading into a state park. They applied 320,000 gallons on only 5 acres! The IL Pollution Control Board settled recently with Traditions agreeing to pay only $1,000 of the over $250,000 fines and abandoning the partially constructed project. (To read more go to stopthemegadairy.org.) Farmers like me were concerned that their groundwater would be contaminated by the millions of gallons of liquid waste generated by over 5,000 cows. Farmers cannot operate profitably if their water is contaminated. This self-regulated operation did not get an NPDES permit because they said they wouldn't discharge. Self-regulation doesn't work, especially in situations like this. Large industrial farms are a huge risk to clean air and water. It is time to keep a closer eye on them by the requiring information on where they are and how much waste they generate! Don't expect the public to have the resources and time to watch them!

Name Larry Sailer
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I would to share my thoughts on the IA Nutrient Reduction Strategy.
The plan that has been devised is a big increase in what we have done in the past. I think it is well thought out and will greatly increase the efforts of what has been done in the past.
The voluntary part, I think will multiply the plan by using farmer money and government funds together. It's a kind of skin in the game type of mentality. It should be the part that makes this effort the most successful.
On my own farm, the cost share projects have worked the best. The extra funds have enabled me to do projects that I couldn't do on my own. But yet with my own money involved, I want to make sure the project works.
I have read many letters to the editor. Most are critical of what has been done in the past, even saying that it has not worked. They mention how we have more endangered waters then ever before. I strongly disagree. I have been involved in farming for 60 years and have watched as the water has improved greatly. On my own farm, by using no-til, better technology and genetics, I see huge gains over the plow it black mentality we had before.
I see a lot more wild life than even just twenty years ago.
We must also remember the Dead Zone in the gulf is not a new problem. It was there before there were farmers in Iowa. If you think about the changes made by mankind to the rivers, the dikes and flood control, we have turned the Mississippi into a fire hose instead of the watering hose it used to be.
We do need funding to continue making the gains already accomplished to not be lost. New government money combined with voluntary money can do the job.
Thank you! Larry Sailer

Timestamp 1/17/2013 1:36 PM

Name John Schultz
City Urbandale
State Iowa

Providing comment on the following sections:

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

Congratulations to the people who have drafted the Nutrient Reduction Strategy for Iowa. I think that anyone who reviews this document thoroughly must appreciate the effort of the people involved. It is based on science and not on pre-conceived ideas.

Timestamp 1/17/2013 1:48 PM

Name Gary D. Kruse
City Dubuque
State Iowa

Providing comment on the following sections:

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

It appears that agiculture is not being held as accountable as urban sources of pollution. While agriculture is estimated to account for 70% of the phosphorus and nitrogen, urban sources are much more highly regulated and agriculure is on a voluntary basis. Please hold agriculure as acountable as municipal and urban sources.

Timestamp 1/17/2013 2:13 PM

Name Joseph Groszbach
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I farm in Clarke County Iowa,would like to comment on IOWA NUTRIENT REDUCTION STRATEGY. I support it, also would like to ask you to support and fund the effort when it comes up as legislation. The voluntary approach is better than A mandatory from the federal level.

Thank you Joseph Groszbach

Timestamp 1/17/2013 2:13 PM

Name Jay Mathahs
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

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

Thank You for your consideration in this matter. Jay Mathahs

Name Heidi Lack
City
State Iowa

Providing comment on the following sections:

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

Adult bodies are about 57 percent H2O.

Baby bodies are about 75 percent H2O.

Adult bodies are about 2.6% nitrogen and 1% phosphorus. Too much is toxic/poisonous.

It is easier for us each to improve our water quality if there is a federal-state water quality law covering drinking water, recreational/outdoors-play water, industrial-use water, and waste water. The law needs to list specific analyte allowable measurement levels for the varied elements and chemicals (including nitrogen and phosphorus and their various combinations).

Eventually, non-drinking water sources may be our sources of backup drinking water, so trying gradually to improve water quality everywhere is needed.

Timestamp 1/17/2013 2:33 PM

Name Scott Pierce
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I wanted to express my support for the Iowa Nutrient reduction strategy. The strategy is an approach that combines research, practicality, and is reasonable. Farmers understand the importance of nutrient loss because it hurts the environment, plus in reduces the nutrients in the soil available for plant uptake. By combining the various groups to help tackle this issue, some reasonable and effective changes can be made. The nutrient reduction strategy can be a benefit for farmers, agriculture, and the environment. Opponents who say that it wil not help needs to know that this is a science-based approach that could help farmers profitablity by reducing nutrient loss. A strategy for reducing nutrient loss would be very well adopted due to helping farmers reduce fertilizer applied. Scott Pierce

Timestamp 1/17/2013 2:42 PM

Name Josh Lehs
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 nutrient reduction policy. Currently many farmers like myself are enrolled in programs to support conservation in farming. Please help to support the the Nutrient Reduction Strategy.

Without this support many conservation tasks would not be accomplished. Some examples are improved waterways, watershed programs, buffer strips, and fertilizer application methods.

In the past when funding was limited, most of these projects could not be accomplished without cost share funding. It is important to keep improving the land we have to the best of our ability. This is one way of helping that be a success.

Water quality is very important to everyone. Making a difference in conservation is one way of improving this. Josh Lehs

Timestamp 1/17/2013 2:50 PM

Name Esta Raasch
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

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

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

Voluntary conservation practices are already implemented and more will be implemented in the future to benefit farms and the surrounding environment.

Iowa agricultural people can do this!!! Esta Raasch

Timestamp 1/17/2013 3:08 PM

Name Alex Durst
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

We need to support the science based Iowa Nutrient Reduction Strategy, as well as other conservation cost-share programs. These must be voluntary conservation practices,but we must maintain agricultural production. We as farmers know our land and what works out here in rural America. We are already using conservation practices for the betterment of our township, county,state, and country. We want to be as healthy as the next person, we are not going to do anything to risk our own health and welfare. Our wells are right here on our farms. We are the first ones to drink the water. What do think we are going to do" Science, real scientific unbiased facts and volunteerism for these programs are the way to impliment these programs. Give them funding and let the farmer take care of his land. He is the expert on it. Alex Durst

Timestamp 1/17/2013 3:09 PM

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

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

Our family strives to be good stewards of the land. We hope to one day pass our farm on to our children. Which is why we do the best we can with conservation practices. Stacy Boender

Timestamp 1/17/2013 3:18 PM

Name Daniel Winterhof
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am writing for your support to fund the Iowa Nutrient Reduction Strategy. I would VOLUNTEER to use ISU researched practices rather than "one size fits all" mandates that are expected to work the same across the entire state.
Thanks for your time. Daniel Winterhof

Timestamp 1/17/2013 3:20 PM

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

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

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

Our family currently has fenced the areas immediately adjacent to the creeks on our farm so that our cattle do not roam freely in the creek.

We cannot continue to implement regulations on our family farms. We need to be able to find a balance between regulations and sustainability of agriculture production.

As farmers, we are great stewards of this land and have been doing this without regulations for 5 generations.

I hope you will consider this information and support funding the Iowa Nutrient Reduction Strategy. Melanie Guinn

Timestamp 1/17/2013 3:22 PM

Name Kevin Prevo
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

It is in the best interest of Iowa farmer to keep the nutrient reduction strategy as voluntary. On our farm we are already complying with manure management plans and always do what is best for our ground and its longevity. I am the 5th generation to farm this land, so it is very important to my family. Kevin Prevo

Name Alexander Gabis
City Faiffield
State Iowa

Providing comment on the following sections:

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

To Whom It May Concern: Look, this state is nothing less than a disaster, ecologically speaking. It's becoming the Nauru of the Midwest -- a stripped, stark plain -- a dead-zone unsuitable for human habitation. Mile after mile of monoculture, commodity farming and the unlimited proliferation of putrid CAFOs prove beyond any doubt that the people of Iowa cannot be trusted to manage their own habitat. These "farmers," so-called, are poisoning and squandering the most precious resources this state has: its soil and its water. Someone had better step up to the plate here. I personally hate regulation; I hate the idea of a top-down, monolithic government telling communities how to behave, but unfortunately, Iowans have brought this on themselves. Specifically, the giant agribusiness interests have brought it on, along with the fools at the local level who so willing partner with the likes of Tyson, Cargill, ADM and so forth. We are shooting themselves in the foot. Hog farmers and corn growers are going to drive this state into an environmental oblivion from which it will not recover. We need to put some serious pressure on the agribusiness industry, for it is clearly they who are polluting our streams and rivers. Force must unfortunately be used; they don't respond to anything else. Voluntary compliance is a utopian vision, but the reality right now is that we need to hit these guys in the mouth. And for them their mouth is their pocket-book.

Al Gabis

Fairfield

Timestamp 1/17/2013 3:47 PM

Name Don Paulson
City Letts
State Iowa

Providing comment on the following sections:

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

This plan is unacceptable. If voluntary practices and compliance worked a strategy wouldn't be needed. The concerns brought forward by the Environmental Protection Agency in their letter to Secretary Northey and Director Gipp as well as the concerns from the Iowa Chapter of the Sierra Club need to be answered implemented in any nutrient reduction plan.

Thank you for your time.

Don Paulson

Name Jon Freese
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I support science-based state nutrient reduction stategy for a couple of reasons.

-I believe that most farmers try to improve all lands, not just the area they farm.

-It's to everyones advantage to have the crops use the nutrients and not let them into the water.

-This is one of the few times a situation has come up that the government may give the people a chance to fix it, as apposed to more regulations by the EPA, IDALS, DNR, NRCS, etc. No disrespect to my friends in those offices mentioned! I believe you folks have enough on your plates.

At risk of making this to long, I'll give one reason why the state lawmakers should fund the Iowa Nutrient Reduction Strategy:

Economics.

It's been my experience that most of the conservation practices that we've implemented on our farm have saved or made us money.

Some of the things we've (my Father and I) have implemented on our farm:

Cattle feed lots under roof. We now custom feed 600 head of cattle in two hoop style buildings. Zero water run off, unlike the old outside lots.

Applying our cattle manure in the ground as opposed to on top of the ground. We have added two manure pits (one on the down hill side of each barn). We now can use our liquid cattle manure in the same method as you would liquid hog manure. This is by far a more cost effective, time saving, and environmentally friendly way to use manure than the old manure spreader on top of the ground.

We have, in the last couple years, began to split shot our applications of nitrogen in our corn crops. Whether it be fall or spring applied manure, followed by a smaller rate of 28%; or making two applications of 28%. We have been using tissue samples of the corn to determine when and how much more nitrogen should be used for the second application. The key is to give the plant nutrients when it needs it. Don't put it all out there before you plant and hope there's some left for tassel time and kernel fill. Feed the plant nutrients when it needs it, you'll have better crops and less nutrients will end up wasted.

I think that the goals trying to be accomplished are very realistic and it should be fairly easy to get people involved. If for no other reasons than what I (one little farmer in the middle of Iowa) stated above.

Thank you! Jon Freese

Timestamp 1/17/2013 4:05 PM

Name Henrietta Borman-Grinter
City Fairfield
State Iowa

Providing comment on the following sections:

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

Whatever the solutions, it always comes down to financial support. Our Governor has a surplus of what, 20 Billion dollars. Couldn't some of this be allocated to make a dent in saving the Water of Iowa that pollutes all the way to the Gulf of Mexico. Ask the Governor for his input. Many thanks. HBG

Timestamp 1/17/2013 4:19 PM

Name George Beardmore
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I support voluntary conservation practices to improve water quality and believe they will work

if given adequate funding. I follow a nutrient management plan for the manure from our hogs

and have miles of terraces and am as concerned about water quality as anyone George Beardmore

Name Gabrielle Roesch
City Ames
State Iowa

Providing comment on the following sections:

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

It is not enough to rely on farmers and limited conservation agency staff to ensure water quality improvements. The State or other institutions or organizations must fund both conservation practices and increased natural resource management staff to ensure adoption and compliance. This increased funding will support Iowa in realistically achieving meaningful non-point source pollution reduction despite current agricultural practices driven by high crop prices. Currently we have a voluntary system that has done little to reduce non-point source pollution into Iowa waterways, the Mississippi Watershed and the Gulf of Mexico.

I attended the December 19th public meeting in Ames and one of the strategy s contributors stated that a cultural shift is needed to successfully engage Iowans in adopting the needed water quality improvements and conservation practices. I agree that a cultural shift is indeed needed but I do not see how your strategy achieves this.

The strategy as currently outlined includes hypothetical adoption rates of conservation practices through voluntary compliance, yet the research team lacks adequate input from the field of social science--and farmers themselves--that would validate these scenarios. Use of current participatory conservation research would offer real-life examples of what the nutrient strategy plan lacks a diversity of voices and perspectives including farmers participating in field trials and voluntary conservation, non-profits developing extensive networks of public-private collaboration to address environmental concerns, and diverse stakeholders engaging in targeted projects creating watershed scale-improvements. Further, the strategy calls for additional agricultural conservation outreach and resources, but an awareness campaign is not enough to change the economic realities faced by farmers brought about by the high cost of corn. Finally, the strategy assumes that there is a way to do even more with currently limited financial resources allocated to support conservation and we have seen that this has not worked. The strategy needs to incorporate some voices of social scientists including sociologists, social psychologists and economists to give the strategy better tools for diffusing conservation practices across the landscape.

Our water quality will not improve for the benefit of all Iowans without the State of Iowa, farmers and Iowan institutions, taking responsibility for implementing meaningful and measurable conservation practices that actually improve water quality. Despite the messaging of some of the strategy s team members, Iowans do not all share an equal burden or responsibility for improving water quality. This must be facilitated by increased State funding to support cost-share programs and their administration, as well as a strategic outreach plan that uses the best social science research. The state may also have to look at providing some "stick" measures that punish farmers that continually ignore best management practices. Water quality is a public good that is managed by all of us in society but we do not all pollute it at the same rate. Those that do should have to pay more to improve the quality of that shared resource. That being said, since Iowan farmers are producing agricultural commodities, perhaps all of us need to pay to incentivize farmers to change practices.

Timestamp 1/17/2013 4:31 PM

Name Matthew Emerson
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 you in concern to the water quality concerns in Iowa. Many not related to agriculture, feel more regulations on farmers is the answer. Many of these people are not educated on what happens on farms. Farmers are not interested in losing their nutrients that they put on the ground to grow crops, and also they are not interested in losing the soil. With programs like the Nutrient Reduction Strategy in place, this helps farmers work with conservation efforts to enable them to enact conservation practices that are effective for their farm. Iowa is diverse in its landscape, not all of it can be treated the same. I urge you to support continued funding for the Iowa Nutrient Reduction Strategy.
Matthew Emerson

Timestamp 1/17/2013 4:36 PM

Name Joel Hoegh
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I believe that farmers want to reduce runoff from their farms. I am an earthmoving contractor along with being a farmer and I have never been as busy building terraces as I have in the last five years. I have been raising continuous corn on my lighter soils using no-till practices. The technology is available now to do so. We do not need more government control! We can do this without them to keep producing the cheapest and most abundant food supply in the world. Thank you for considering this. Joel Hoegh

Timestamp 1/17/2013 4:56 PM

Name Richard Yoder
City Omaha
State Nebraska

Providing comment on the following sections:

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

My comments are general and emphasize the science used and strategies for impacting NPS pollution.

First, too much funding is going to earth science, not enough to the behavior, social, and decision sciences (BSDS). Major and significant resources need to weaned away from earth and physical science and turned to BSDS.

Second, BSDS has more than one model of creating change among the populations which create NPS pollution. To effectively shift the culture to actually practice a prevention ethic, more models should be tried and evaluated until the right interventions are used in the right areas. Not all NPS polluters drive the same cars, go to the same churches, vote for the same party, raise their families in the same way. What rational person would expect all NPS polluters to respond to the same cues and incentives? The reasons NPS pollution occurs are as varied as the the needed interventions.

Third, the measurement and goals of the strategy need to be more focused on absolute measures rather than relative measures. Simply doing better than has historically been done is not going to be doing enough to reduce risk to human health and the environment due to NPS pollution.

Timestamp 1/17/2013 5:01 PM

Name Lynn Sackett
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Please be aware that I am in favor of funding the IA Nutrient Reduction Strategy. We need to be proactive, and voluntary, in our efforts to keep our waters and soils from becoming damaged or excessively saturated with fertilizers.

In our farming operations we have implemented many of the current conservation stategies including buffer strips, terracing, and GPS application of fertilizers. We need to be sure that we are using a science based approach to identifying sources of our soil and water contaminations and not just assuming it is only the agriculture activities that are contributing to the problem.

Thank you for your support. Lynn Sackett

Timestamp 1/17/2013 5:11 PM

Name Ann Werner
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

The proposed voluntary nutrient reduction strategy is one of the most exciting conservation proposals to come along in years. It is science based, not another mandate based on theory. Iowa's food producers have been very diligent in improving the environment, and it is refreshing to have offered a science-based, voluntary program. As a grower of cattle and crops, I appreciate the relief from the threatening atmosphere of past programs.

Please insist that strategies are science based and also offer the necessary funding to implement these programs.

Thank you for all you do to encourage food production in our state. Ann Werner

Timestamp 1/17/2013 5:16 PM

Name John Fredrickson
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 Webster county. I would like you to support a science-based state nutrient reduction strategy. I know that it is important for all farmers to have a voluntary conservation practice, so that we can still maintain our crop production.

We need to have the full funding of the Iowa Nutrient Reduction Strategy along with the other state conservation programs. Without funding these projects there will be major delays.

I already have waterways and a terrace on our farm. Plus we do minimum tillage to save our soil and nutrients. These are all very expensive and needed to continue our ability to produce food for the world. John Fredrickson

Timestamp 1/17/2013 5:18 PM

Name James Secor
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 and conservation practices that are voluntary.

These programs need to be adequately funded which has not happened in the past. I would hope with money in the budget that funding can be found this year. James Secor

Timestamp 1/17/2013 5:20 PM

Name Guy Petersen
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I applaud Iowa Secretary of Agriculture Bill Northy, in cooperation with the DNR and ISU, for leading Iowa and mid-western agriculture in the right direction. This science based approach to reducing nutrient run-off is definitely the right direction to head for many reasons. Since Iowa and mid-western agriculture is so diverse, it would be impossible to implement a one size fits all approach that would be effective, let alone fair. Over the last 25 years, I have seeded many acres of grass waterways, headlands, and stream filter strips, and adopted no-till farming practices on almost all of my acres. I have reduced my nutrient applications via VRT fertilizer application and drastically cut my soil loss and nutrient runoff because of no-till. While it is in the best interest of EVERYONE to reduce nutrient runoff, I DO NOT believe that achieving that goal through costly and burdonsome mandatory regulation is the correct approach. This problem did not develop overnight nor will it be solved by the stroke of a legislative pen. Somehow, we need to get the word out of the reductions that have already been achieved through voluntary efforts and continue to implement cost effective voluntary conservation practices that improve our water quality. Adequately funding the Nutrient Reduction Strategy as well as other conservation cost share programs would greatly improve our chances for success. Thank you for your consideration in this matter. Guy Petersen

Timestamp 1/17/2013 5:31 PM

Name Will Luers
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Please support the Nutrient Reduction Strategy!

Our state needs a strategy with science-based conservation practices for farmers to voluntarilly implement on their farms.

On our farm, we already utilize conservation practices such as no-tillage, zone-tillage, and reduced tillage practices. We also protect water quality through precise fertilizer application rates in crop zones, as well as multiple, precisely timed Nitrogen applications throughout the growing season that reduce Nitrogen loss.

Please adequately fund the Iowa Nutrient Reduction Strategy, and other cost-share programs relating to conservation. We farmers care about our land and environment bacause we rely on it to provide for our families for generations! Please team with us in making our operations even better! Will Luers

Timestamp 1/17/2013 5:35 PM

Name Wayne Koehler
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

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

My family has actively implemented voluntary conservation practices in our farming operation for many years. My parents were concerned about soil conservation in the 1970s and installed several terraces and grass waterways on our land. The addition of drainage tile has also reduced runoff and the soil erosion and nutrient loss that accompanies it. In later years I have adopted no-till farming practices that have made additional gains in soil and nutrient conservation. I have also conducted trials on my farms to study the impact of reducing the amount of fertilizers applied, and making applications at different times during the year instead of all at once before a crop is even planted. These trials have allowed me to make informed changes in the way I apply nutrients for crops. I use less nutrients per unit of production and by spacing out and using multiple applications I can reduce the amount of time that applied nutrients are susceptable to loss. I have also used GPS based grid soil sampling and variable rate application of fertilizers since 1997. We are now using actual harvest yield data captured during harvest to calculate actual nutrient removal and apply only what was removed.

Todays fertilizer expenses account for a significant percentage of todays crop production costs. Farmers do not want to spend any more than necessary to produce their crops. Farmers are voluntarily making adjustments to practices and inputs to control their cost of production. This voluntary approach is a win for profitability as well as a win for reducing impact to the environment.

In closing I would like to encourage you to support adequate funding of the Iowa Nutrient Reduction Strategy, as well as the state s other conservation cost-share programs. Wayne Koehler

Name Mary Fish
City Fairfield
State Iowa

Providing comment on the following sections:

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

first of all, model used in Iowa s Nutrient Reduction Strategy has been used by big polluters to get out of cleaning up their acts. I don't see it supporting cleaner water in Iowa, and I don't like seeing it in this documnet.

The word funding is thrown around a lot in the document but it seems like funding is like not very thought out, considering the estimated costs. How does the cost breakdown compare to current use of the proposed funding sources. Where will it cut into those sources and take away funds from other programs? What programs will be minimized and how will this impact farmers and people in Iowas towns and cities?

In addition to municipalities, industry contributes to aquatic pollution. Fertilizer plants, food processing and even food-based production of products like ethanol could be contributing a large percentage of the P and N, not to mention other toxics to Iowa's streams and rivers. Why arent these addressed in the plan? Why aren't industries that take large amounts of water for their industrial processes, using as much as a smallish town, considered in this plan. Consumers are buying HE washers and low flush toilets to conserve precious water, while industry is going the other direction of using the most wasteful processes imaginable. Why is there no recognition of this or liability to big users for clean-up of contaminants from, or rectification of ejected waste water?

Likewise, most of the N and P leaching into Iowa's rivers from non-point sources comes from point sources - concentrated animal feeding operations - where animal waste is concentrated, collected, then sprayed or spread, untreated, on open, often barren fields. These fields are often tiled, and there is no or insufficient biofiltration to remediate the nutrient leached from the soil. Although it sounds good to say what nutrient runs off from Iowa's rich prarie soil is excess, its only excess because what binds it has been destroyed. What binds it is a deep root system rich in microbial life. When this is destroyed for the sake of a shallow rooted monocrop it has nothing to hold on to anymore. Its not excess, its lost. If it were excess, growers wouldn't be spraying anhydrous on their rich Iowa once-prarie soil. The other thing farmers like to do that sends nutrient downstream is punch out mature trees or wooded acreage to expand their tillable footprint. Trees are big mountains of nutrient. They are storehouses of it. If you want to reduce nutrient leaching increase the acreage of Iowa's native trees, especially between fields or pastures and waterways. Trees are also essential for purifying water and restoring springs and aquifers, moderating climate and lots of other things. Unfortunately, since spraying of glyphosate was ramped up many native trees have been stressed and doing poorly. We really cut our own throats with that one.

generally lacking in timeline or goals (especially for agricultural pollution) how long are we going to drag this out? If there is no mandatory compliance and producer X can trade water quality offsets with producer Y, aren't we just paying ourselves to shuffle papers here? How does the water quality actually get improved, can you envision the benchmarks, or a timeline? It seems that this document does little more than the one from 2008, and is equally pablum-atic in its will to make a difference. I cannot tell how the plan will be implemneted, if there's any schedule for prioritizing projects - which there should be. Bigger polluters should clean up first, and should directly bear cost proportional to their profit margin. We should not end up with a scenario where corporations or their franchises (operating per their business model) who create the largest share of nutrient seepage, leakage, run-off, and the like, while reaping the largest profits, end up trading offsets and while continuing to send damaging pollutants into their community's waterways, or have it cleaned up at the expense of the community or are rewarded with funding from taxpayer-funded programs. I would like for the body that oversees distribution of funding and assessment of 'economy-of-scale' polluters' financial participation to be more effective than a proposal on a piece of paper. I would like them to inspire accountability, responsibility and best practices compliance with common sense solutions, favoring biomimicry over concrete and steel.

even though the report cites turbulance or erosion in rivers and streams as a cause of P polution, inducing proper natural turbulance in waterways can help aerate and purify the water. Much of the problem in the gulf may be exacerbated by the Army Corps of Engineers locks and dams on the upper Mississippi river. I think tests should be conducted to see if re-introducing at least zones of natural turbulence in a locked and dammed waterway can reverse or compensate the nutrient overages. (Refer to the work of Victor Schauberger in Callum Coats title Living Energies)

I hope you got a kick out of this!

Timestamp 1/17/2013 6:11 PM

Name Matt Jackson
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Please help the farmers by supporting the Iowa nutrient Reduction Strategy . By giving it proper funding it will allow us as farmers to a good job with using good conservation practices. Matt Jackson

Timestamp 1/17/2013 6:13 PM

Name Donald Kortenkamp
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am urging you to adequately fund the Iowa conservation practices. We need the environment for future farmers. In order to continue saving the enviroment, we need you to support the funding of the Iowa Nutrient Reduction Strategy.

As a farmer, we watch for run-off, use buffer strips, and leave prarie grass in areas. Please continue to use Science based data in determine nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.
Donald Kortenkamp

Timestamp 1/17/2013 6:28 PM

Name Drs. Ann and John Skopin
City Fairfield
State Iowa

Providing comment on the following sections:

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

The Iowa Nutrient Reduction Strategy is an insult to the intelligence of all Iowans! It relies on the same voluntary participation that has proven to be an abysmal failure in addressing the problem of massive pollution in the past. We taxpayers will bear the burden while farmers receive another handout courtesy of our pocketbooks. The plan lacks sensible minimum standards, timelines and measures of progress, and explanations of implementation procedures. Once again the quality of life of all taxpaying Iowans is mindlessly sacrificed for the sake of the profits of the already exceedingly profitable factory farms!!

Timestamp 1/17/2013 6:35 PM

Name Craig Corrin
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

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

Timestamp 1/17/2013 6:38 PM

Name Trevor Whipple
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. I am not excited about any more federal government mandates telling us how to farm and this is the only way I see to keep a voluntary strategy. I firmly believe that most farmers do all they can to protect the soil for the gernerations that follow in there foot steps. I would also like to see more common sense used when doing state funded conservation work. I have done several of these projects and if more common sense and less crap out of a book was used most of these projects could be done cheaper and farm better when finished. Trevor Whipple

Timestamp 1/17/2013 6:55 PM

Name Marianne McGregor, M.D.
City Fairfield
State Iowa

Providing comment on the following sections:

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

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

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

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

Timestamp 1/17/2013 7:03 PM

Name Jeffrey Mordhorst
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 Reduction Strategy program.My opinion is to regulate fertilizer like livestock producers are regulated.The only way it would be sucessful is to hold fertilizer retailer respondsible for over application. Jeffrey Mordhorst

Timestamp 1/17/2013 7:06 PM

Name Mark Wilcox
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I think it is self-evident that Iowa farmers would be in support of this action and we're sure you are also. Not only is this a science-based initiative, but it is also voluntary. There is no need to go to mandatory measures right out of the chute. I think Iowa agricultural people are astute enough to realize that this method of dealing with pollution problems is far preferable to onerous, sometimes draconian mandatory measures that would surely come down the road. This makes sense and deserves your support.

Thanks for your time,

Mark Wilcox

Cherokee County Mark Wilcox

Name Ben Hollingshead
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I was encouraged to hear that Iowa is taking the initiative of a proactive approach to nutrient reduction. I believe that keeping ahead of the curve on issues like this keeps us at the forefront of the United States agricultural system. It is increasingly vital that we continue to be a leader of the pack and not falter or waiver on this issue. I only hope that the lessons of the Dust Bowl days are never forgotten and that people like my grandmother s stories still remind us and teach us that good conservation practices are paramount to ensuring our heritage for generations to come.

We must properly fund voluntary conservation programs. I believe that there are some very good programs that have been proposed and farmers are willing to do them but we must provide the funds for the catalyst to get the ball rolling. Things like cover crops are only beginning again to be realized in their importance and proper funding that program is a great way to kick start the use of cover crops on a commercial scale. We are only beginning to realize and understand the importance microbiological activity plays in the soils. These conservation practices in real world situations are helping us better understand them. My hope is that eventually farmers will see that these pilot conservation tools have merit in large scale commercial agriculture. Now, let me be very clear. No project will ever be a one size fits all program. This state has a very diverse landscape. Look at the differences in our 12 different major soil types in this state, all with different properties and characteristics. We have areas like our central Iowa Des Moines lobe soils comprised of Clarion Nicolet Webster that are almost completely flat with potholes and low lying areas and no more than we get east of State Center we get into the rolling rich soils of Tama-Muscatine-Downs to western Iowa and the Loess Hills of light silt steep slope soils . Each area each soil each farm has its own story to tell of what practice will work best to preserve it.

So please do not get buried by a bunch of political poppycock. This is important and it affects more than just a farmer wanting to put in a waterway. It involves every single one of us. Ben Hollingshead

Timestamp 1/17/2013 7:10 PM

Name Mike Kleitsch
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Hello. I understand that you are talking about Iowa's Nutrient Reduction Strategy. I would be in favor of it being science based and hopefully funded along with conservation cost share programs. I already have waterways, probably wider than needed but I make hay off them and it still slows the water runoff. I also use a rotation of corn, oats and hay on my farm ground which in turn limits my erosion if there is any. Thank you for time. Mike Kleitsch

Timestamp 1/17/2013 7:19 PM

Name Mark Loutsch
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I ask you to fund the Nutrient Reduction Strategy and Iowa's cost-share programs. I farm about 1000 acres with my two brothers and all of it is terraced to keep water from running off. Some are the ones my grandfather built in 1949 that we keep maintained. It is important to be science based. Farmers are willing to do proven pratices from local areas. Mark Loutsch

Timestamp 1/17/2013 7:29 PM

Name Randy Wuebker
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

The need for farmers to be good stewards is higher than ever. Many farmers already do what they can when it comes to conservation practices, but the cost is so high. With adequate cost-share funding, much more could and would be done. Please fully fund all conservation programs.

Thank you for your time and consideration on this matter. Randy Wuebker

Timestamp 1/17/2013 7:32 PM

Name Bryan Kruse
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 voluntary science based nutrient reduction stratery.The state must take responsabilty and adequately fund it as needed. Voluntary conservation projects in the past have had great impact when properly funded.

On our farm we have built terraces and seeded filter strips along creeks to reduce runoff.We use variable rate fertilizer application to reduce the amount of nitrogen and other fertilizers we use on our land.This year we will use variable rate planting to optimize the fertilizer we have applied.We have done all of this voluntarily. Bryan Kruse

Name Katherine Mittman
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Farmers are already choosing to work to make conservation practices a part of their farming plan.

From deciding to work with the CRP programs around the state to adding a cover crop to fields during the winter are conservation practices that farmers are already implementing.

We as farmers need you to support so that we can continue to grow crops to field the Nation/World but also will help preserve the land for future generations. Katherine Mittman

Timestamp 1/17/2013 7:36 PM

Name Brett Sweeting
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 nutrient reduction, with 3rd party oversight. It seems like we jump the gun on policy and don't quite understand the impacts before we sign the bills.
If we fully fund the studies we would be able to get a better understanding on how Iowa really effects the other states instead of what they say we do.
If we could see how it would befit us in the future, we would do it. Right now it seems like there is not much justifiable science to make the changes. I would not need a gov't agency to make the change.
Thank you for your time. Brett Sweeting

Timestamp 1/17/2013 7:40 PM

Name Richard and Lucinda Hall
City Fairfield
State Iowa

Providing comment on the following sections:

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

We really need to protect our waters that nourish all of life. Please put in place stronger policies than are proposed, with mandatory checks on progress. Do it quickly and make it a high priority.

Thank You,

The Halls

Timestamp 1/17/2013 7:42 PM

Name Nick Hermanson
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am writing in support of Iowa's Nutrient Reduction Strategy. I hope that you will consider adequately funding this program. Iowa's farmers, much like myself are already taking precautionary steps to improve our environmental impact and image.

On my farm, my family has implemented a strip till conservation tillage system farm wide, that till only 1/3 of the ground, leaving existing plant residue for erosion control. We have also planted buffer strips along all of our streams that border fields. We are currently in the process of building retention ponds to drain our tile lines into, that will provide irrigation water at a later date. With additional scientific research and conservation funding, we can all make progress in these areas. I believe a dollar spent on conservation efforts will far outweigh those spent on increased regulations. Nick Hermanson

Timestamp 1/17/2013 7:43 PM

Name Ronald Retleff
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 strategy. I feel it is important that the implementation of conservation practices be voluntary. I know the land I farm best. I also understand that what I do on my farm has implications that excede the boundarys of my land. Living and farming next to a river quickly makes you aware of the effects of a heavy rain, or fast melting snow pack. or just plain old high water. I have come to realize that if I want to pass my farm on to future generations I needed to implement some conservation practices. So I enrolled my most vulnerable ground into CP-33. Since establishment of my CRP I have allready noticed a reduction in erosion. I also changed my tillage practices to reduce erosion from the wind and from the rain.

I urge you to adequately fund the Nutrient Reduction Strategy, as well as other cost sharing conservation programs Ronald Retleff

Timestamp 1/17/2013 7:49 PM

Name Darren Luers
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Thank you for the support on this issue. Conservation is something our family practices everyday. With funding of programs and voluntary practices. Farmers all over the state will be able to continue and maintain agricultural production at its best. Darren Luers

Timestamp 1/17/2013 7:50 PM

Name Shane DeBord
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

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

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

Timestamp 1/17/2013 7:55 PM

Name Richard Warren
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

We put in terraces and use grass waterways. We limit the amount of chemicals and fertilizer we use. We work to control run off. Because there is more work to do, it is imperative that we keep the funding for conservation practices.

Thank you for your consideration of this issue! Richard Warren

Timestamp 1/17/2013 7:59 PM

Name Frank Wintroub
City Fairfield
State Iowa

Providing comment on the following sections:

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

The policy that is being considered is not strong enough on most levels to significantly improve the protection of Iowas water.

Leaving to much of the responsibility for clean up or proper behavior to protect the water is left to voluntary efforts.

Timestamp 1/17/2013 8:03 PM

Name Nate Kemperman
City Ames
State Iowa

Providing comment on the following sections:

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

This is an addition to my first comments, sent on the 15th of January.

I just wanted to make clear that in the last of my points, I wrote "2nd section", meaning actually Section 1. My basic feelings are still the same though - please make the language clearer as the writing style made it hard for me to follow. And please be consistent throughout the document. For example, what exactly is the role of application reduction in the non-point source strategy and what is the basis of that position?

Thank you again for making this strategy happen,

Nate Kemperman

Timestamp 1/17/2013 8:07 PM

Name John L. Hanson
City Marion
State Iowa

Providing comment on the following sections:

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

The Iowa Nutrient Reduction Strategy is too weak on nonpoint source pollution. After 40 years of non-compliance with the Clean Water Act, Iowa must take more concrete steps to clean our waters. Our reliance on continued voluntary efforts is mistaken and doomed. Also, our Nutrient Strategy is at odds with state supported efforts to increase the availability of synthetic fertilizer by subsidizing two large factories. All pollution contributors must be held accountable, only then can we expect an improvement.

-jh

Timestamp 1/17/2013 8:31 PM

Name Elizabeth Quarles
City Fairfield
State Iowa

Providing comment on the following sections:

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

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

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

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

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

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

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

Timestamp 1/17/2013 8:34 PM

Name Adam Hill
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 adequately fund the Iowa Nutrient Reduction Strategy. Iowa's failure to fully fund these programs in the past has delayed needed conservation projects. I no-till most of the land I farm and have also built terraces and put in tile. Please fully fund the Iowa Nutrient Reduction Strategy. Adam Hill

Timestamp 1/17/2013 8:36 PM

Name Tim Diamond
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I know we have discussed this topic when we met at Johnny Ray's a month ago, but it's very important that we get an Iowa nutrient reduction strategy in place. I feel if we don't do something on the state level we will be going down the wrong road. The people on the federal level don't understand what it takes go a crop and they think we are just out here wasting chemicals and fertilizer. Most of us are utilizing everything we put on our land, have bufferstrips and waterways where needed, and use minimal or till practices. I hope you will strongly consider adequately funding the nutrient strategy reduction. Tim Diamond

Timestamp 1/17/2013 8:46 PM

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

Timestamp 1/17/2013 8:46 PM

Name Bill Beers
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 take this opportunity to express my support for a science-based state nutrient reduction strategy. I would hope that this plan would recognize the importance of voluntary conservation practices and the need to maintain agricultural production.

Please adequately fund the Iowa Nutrient Reduction Strategy as well as the states other conservation cost-share programs. In the past, failure to fund these programs has delayed implementation of these vary conservation practices.

On our farm we have already implemented water control practices that slow water as it leaves our land so that soil and nutrients have a chance to settle. In the future we would like to expand these practices to protect our environment further. Bill Beers

Timestamp 1/17/2013 8:57 PM

Name Ryan Gaffney
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Overall I think it is a good idea. It would be more beneficial to catch the nutrient load discharge before it ends up in our rivers and streams instead of reducing the rates of chemical being applied to farm fields. Ryan Gaffney

Timestamp 1/17/2013 9:05 PM

Name Bret Hays
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I strongly encourage you to support the nutrient reduction strategy as well as continued funding for the state's other conservation cost share programs. Despite popular belief farmers care about the environment. If we fail to take care of our land, it will not continue to be productive for future generations. As a father of three, and forth generation farmer, nothing would make me happier then to pass the operation onto a fifth generation and further. That to me is the goal of every farmer. Bret Hays

Timestamp 1/17/2013 9:17 PM

Name Corey Malichky
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

My name is Corey and I have a wife and two young childern I am involved in a small family farm operation and also custom feed hogs. All the farmers that I know do more for the enviroment than all the loud whinny enviromentalist put together. Please stick to the facts and use only valid science, like what was used to construct Nutrient Reduction Strategy. Please support this plan and fund it along with the other conservation programs, our soil is the most valuable thing Iowa has. Corey Malichky

Timestamp 1/17/2013 9:17 PM

Name David Scott
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 you to support and fund the Iowa Nutrient Reduction Strategy. This is a plan created with real science and in our home state not Washington DC. The EPA is going to force us to do something so lets be pro active and use a plan that is reasonable.

We are 100% no-till, Have miles of terraces and grassed waterways on our land, we seed cover crops on highly erodeable ground in late August each year. We are striving to do our part already and don't feel that we need the EPA beating us up.

Thankyou David Scott

Timestamp 1/17/2013 9:23 PM

Name Matthew Fitzpatrick
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I support a state nutrient reduction strategy that would be implemented through voluntary conservation practices. I want to encourage you to support the Iowa Nutrient Reduction Strategy by adequately funding this and other cost-share conservation programs. I believe this strategy would be great for sustaining the future of Iowa agriculture. Thank you for your time. Matthew Fitzpatrick

Timestamp 1/17/2013 9:31 PM

Name Rick Weymiller
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I actually applaude the efforts of the state of Iowa for the pursuance of a nutrient reduction plan that actually uses Science. It is not a knee jerk reaction that caused the great Cheasapeake Bay fiasco.

I am a firm beleiver that the carrot works bstter than a stick .

With the help of the NRCS we have improved our feedlots with retention walls and drain fields. I have also planted a nutrient retention strip along the river nest to outr house. Rick Weymiller

Timestamp 1/17/2013 9:33 PM

Name Randy Greufe
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am curentlly a strip tiller this leaves a lot of residue on top with only disturbing a small portion to keep the soil from blowing. We need to take a science base approach to this so we get it done right. This will happen with the science based approach!! Randy Greufe

Timestamp 1/17/2013 9:36 PM

Name Clayton Reints
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am writing in support of adequate funding for a nutrient reduction strategy. Voluntary conservation practices are a critical part of maintaining agricultural production in Iowa and insufficient funds hinder agriculture in Iowa. Iowa farmers are open to participating in conservation practices that are beneficial to their land and their operations. Iowa farmers are leaders in conservation. As a member of multi-generation farm, I have witness the impact of conservation efforts. We participate in conservational practices because they benefit our farming operation. We are able to conserve our soil and create a quality of life throughout the water and wildife. We are eager to contiue in conservation efforts but additional funding will help aid in the preservation of Iowa farm land and life. Clayton Reints

Timestamp 1/17/2013 9:36 PM

Name Richard Roorda
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am writing today to lend my support to the Iowa Nutrient Reduction Strategy and to encourage you to both support and fund same.

This program was developed by a broad range of stakeholders including IDALS, DNR and ISU and is a science-based program of voluntary conservation practices that will have a great benefit on water quality in this state. I am in disagreement with those who claim the INRS will not work and more regulations are needed. My opinion is that there are practices that would work here in Jasper county that wouldn't be applicable in other areas of the state due to differences in things like soils and topography.

I realize that there will likely be a problem with funding (state cost-share) but the demand for assistance in the past outstripping the supply of funds has kept many projects from completion.

On my own farm I have been gradually reshaping and grading waterways, installing tile drainage, seeding some buffer strips along minor creeks and this fall I seeded 20 acres of cereal rye on the corn acres I harvested as silage. I would like to continue these projects and more in the future.

Again, please support and fund the Iowa Nutrient Reduction Strategy. Richard Roorda

Timestamp 1/17/2013 9:37 PM

Name Joseph Rotta
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Bill Northey had the vision to put Iowa in a great position to conserve some of the best soils in the world. Terraces waterways filterstrips and notill are some pf the practices that I have implented in the past
Cover crops are an idea that was researched in the NRS that look like they might be advantagous to me in the future.I urgeyou to fund the Nutrient Reduction Strategy. Thanks for listening. Joseph Rotta

Name "Jack" John S Engstrom
City Fairfield
State Iowa

Providing comment on the following sections:

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

I commend that-part-of the-state's-proposed-strategy that recommends strict new rules for cities and industry,

BUT I am unimpressed and very disappoionted with the measures it proposes to address AGRICULTURE's contributions to the excessive nutrients in our water.

• The strategy relies entirely on the same voluntary approaches for agriculture that have failed to clean up Iowa's water. Relying on voluntary measures is not effective enough. Decades of relying on this voluntary approach has done little to fix the problem

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

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

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

• Despite an accompanying science assessment that outlines the well-documented effectiveness of numerous conservation practices that farm businesses CAN implement immediately, the state plan recommends NO MINIMUM of care that farmers SHOULD follow.

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

I submit that “more teeth” needs to be put into AGRICULTURE’s reduction of nutrient-discharge in order to have a real (rather than merely purported) strategy that could-actually-achieve the stated goals, and would eliminate Iowa’s share of Gulf-of-Mexico’s apoxia.

Yours,

“Jack” John S. Engstrom, Vice President of the Iowa Sierra Club’s Leopold-Group.
engstrom@lisco.com, 641/ 469-5243
mail: P.O. Box 1704, Fairfield, Iowa 52556-0029
411 E. Hempstead Ave basement, Fairfield 52556-2954

Timestamp 1/17/2013 9:50 PM

Name Robert Vanwyk
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Decisions on best practices on any given parcel of land are best made by the farmer who literally has his boots on the ground ;not a lawmaker and not a faceless bureaucrat. Please let us make our own science backed decisions on conservation practices..It would definately help it theIowa Nutrient Reduction Strategy as well as other voluntary conservation policies are fully funded. Thank you. Robert Vanwyk

Timestamp 1/17/2013 9:55 PM

Name Andy Jackson
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 take a minute to urge you to support a science based nutrient reduction stratagy.

While I support a clean responsible environment, we must also maintain Iowa's productivity and thriving ag industry. Runoff from urban lawns and golf courses should also be included. Andy Jackson

Timestamp 1/17/2013 9:59 PM

Name Beth Butcher
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 you to ask for your assistance in supporting the Iowa Nutrient Reduction Strategy. I feel this will help tremendously with the water quality and other conservation practices. Much research has been done on these practices. I believe this would be the most cost effective and useful method for the farmers here in Iowa. We don't need more regulations forced on us. We want what is best for our farms and our environment; we want to help with the solution also.

As farmers, we have implemented conservation measures by building terraces and adding water ways to help reduce soil erosion. We are working at helping maintain our envirnment.

Again, I am asking you to help fund this strategy. Thanks for your help. Beth Butcher

Timestamp 1/17/2013 10:02

Name James Holz
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am a young farmer in the changing times of Agriculture. I believe water conservation / quality is one of the most important issues in the future of Agriculture in the United States. Because of its importance, I have used cover crops and filter strips that combat soil erosion, improve water quality, and soil health. That is why the adoption and adequate funding of the Iowa Nutrient Reduction Strategy is imperative to Iowa's agriculture success. However, this strategy should be science based by researchers that understand Iowa's landscape and farmer practices (ie Iowa State University) Many critics of this program say this should be regulated instead of a voluntary program. I disagree with these critics; voluntary programs are the best option. Farmers and government working together will find the most practical and beneficial practices.

James Holz James Holz

Timestamp 1/17/2013 10:04

Name Mark Schuelke
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 Iowa Nutrient Reduction Strategy movement. New ideas can only become common practice in a short period of time by spreading the WORD. That is what these conservation programs do! Mark Schuelke

Timestamp 1/17/2013 10:10

Name John Hanson
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

As a farmer and member of the Ag Business commu nity I wish to express my support for a science-based state nutrient reduction strategy that recognizes the importancde of voluntary conservation practices and the need to maintain agricultural production.

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

Our farm is 100% no-till and we have used cost share money various times to stop errosion and improve water quality on our farms. John Hanson

Timestamp 1/17/2013 10:14

Name Ross Kooiker
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.

No one knows the fields of Iowa better than the farmers that are cropping them.

Technology is constantly improving and making soil conservation efforts easier to do while helping to improve yields.

In the past few years we have reduced our tillage greatly. We now use no tillage for any bean acres and have started to do some no till corn. The no till corn shows promise but we are being cautious as there is lots of money on the line on every acre.

Adopting one size fits all regulations would be very costly for Iowa's farmers both in equipment and yield losses. Ross Kooiker

Timestamp 1/17/2013 10:26

Name Brady Hanson
City Castana
State Iowa

Providing comment on the following sections:

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

Please set policy based scince and use that critera when making decistions on coonservation pratices

Timestamp 1/17/2013 10:31

Name Keith Henry
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I would appericiate your attention on the matter of nutrient reduction strategy. Many opperations are approching this in a variety of ways because each situation is unique and needs to be handled in different ways. Many of the solutions can be very costly to implement so the need for state funding or cost sharing programs is needed to accomplish these goals. There is some simple technics like a practice that I am utilizing this fall and winter season, such as seeding several acres to winter wheat to achieve a ground cover crop to protect from wind and water erosion and to build some organic matter in the soil profile.

Thank You for your time. Keith Henry

Timestamp 1/17/2013 10:33

Name Michael Mcenany
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Nutrient management is important for the state of Iowa, however we can't take a one size fits all approach because of how the soil types vary across the state. A one sized fits all solution is not the answer. Therefore, we need funding for conservation cost share programs as well as funding for nutrient reduction strategies. This will allow us, Iowas farmers to better maximize yield without being wasteful when it comes to nutrient usage. Michael Mcenany

Timestamp 1/17/2013 10:36

Name David Skubal
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

We already use riparian buffers, terrace, grass waterways and no-till with great success. These kinds of issues are handled better on a state level rather than the EPA level.
ISU can deliver the technical support for helping to reduce runoff, let's use them! David Skubal

Timestamp 1/17/2013 10:40

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

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

I currently use conservation practices, such as contour stripping and crop rotation with forages, on my farm operation. I hope to continue to implement these conservation practices in the future to benefit my farm and the surrounding environment.

Your support of the Iowa Nutrient Reduction Strategy would benefit all Iowa residents and encourage Iowa farmers to use more conservation practices. Klark Telleen

Timestamp 1/17/2013 10:44

Name David Wohlford
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am writing in support of the Iowa Nutrient Reduction Strategy. This plan was drawn up by and based on research from Iowa State University, IDALS and the DNR. These institutions understand Iowa agriculture, soils and weather. They also work to help farmers reduce soil loss and prevent nutrient loss.

There are many ways to reduce nutrient loss. In our operation we have may acres of grass waterways to slow runoff and filter the water. We also use buffer strips along some streams to slow bank erosion. But, the efforts we make in our operation may not be right for other farmers. Therefor, the programs need to be voluntary to give farmers the flexibilty to make them fit their operation.

Many practices to control nutrient loss can be costly to implement. Therefor, funding for programs to address nutrient loss is needed. In the past inadequate funding has delayed needed conservation practices.

I support and ask you to support the science-based nutrient management plan for the state of Iowa. It also needs to be voluntary and properly funded. David Wohlford

Timestamp 1/17/2013 10:44

Name Todd Thomas
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Science-based state nutrient reduction strategys need to recognize the importance of voluntary conservation cost share programs. The failure to fund these programs in the past has delayed needed conservation projects. These programs need to be funded fully to support Iowa's clean waters and to help keep the environment clean Todd Thomas

Timestamp 1/17/2013 10:50

Name David Klindt
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Hello, my name is David Klindt and I farm with my family in Bettendorf raising corn, beans, alfalfa hay and cattle. I am writing today because I feel it is very important to fund the states conservation cost-share programs along with a nutrient reduction strategy. Having two young kids at home it is very important to protect our soil and water for future generations. We practice many conservation practices already such as crop rotation, maintaining waterways that the grass can be harvested for cattle feed and no-till. Agriculture production is one of the most important things in Iowa and I feel this would be money very well spent. Thanks for your time David Klindt

Timestamp 1/17/2013 10:52

Name Timothy Keegan
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I think it is well known there is need to evaluate and set up processes to mitigate nutrient loss through run off. That is why the task force was set up with the Iowa Department of Agriculture and Land Stewardship, the Iowa Department of Natural Resources, and the Iowa State University College of Agriculture and Life Sciences. Keep in mind, these are the experts in this issue and have experience on several different levels. What they have come up with is a science based voluntary process. As a young farmer that is actively involved in managing 3rd generation farm ground as well as actively renting new, I am very interested in reducing the nutrient loss. Not only does it not make sense from an environmental standpoint, it makes sense economically. That is why I am convinced a voluntary nutrient reduction model will work. The cost of fertilizer does not allow for any loss. We cannot afford to be doing practices that are not conserving our nutrients because the replacement cost makes us uncompetitive in the long term. On our operation, we aready are using variable rate nitrogen application with different types of nitrogen as well as gride soil testing on phosphorus application. In addition, we have buffer strips along creeks and water sources and utilize 100% no-till on our corn/soy rotation. I urge you to help fund the continued support for this type of approach. From a young producer standpoint, I understand the importance of this issue and hope that you do to. Timothy Keegan

Timestamp 1/17/2013 10:56

Name David Rydberg
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 Iowa Nutrient Reduction Strategy. As a farmer I understand the value of conservation first hand. We do not need more regulations, we need a sicence based approach that will do the most good with the least cost. Please help us by adequately funding the Strategy and other conservation cost share programs. David Rydberg

Timestamp 1/17/2013 11:05

Name Vincent Willey
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 fund conervation cost share programs.I have a 280 acre farm in the loess hills and I have cost shared a number of programs since 1955 when the farm was purchesed and it is a much more productive farm today than in 1955.Please restrain from more rules and regulations that in many cases have no common sense.We have a large planet to feed and please do not strangle that production with sometimes science lacking rules and regulations Vincent Willey

Timestamp 1/18/2013 2:14 AM

Name carol olicker
City
State

Providing comment on the following sections:

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

I strongly concur with Jack Engstrom's comments

Clearly, voluntary enforcement is a farce; it is actually a transparent non-enforcement policy

please read Jack Engstrom's points again.

And again.

And again.

He represents the thinking of thousands and thousands of Iowa voters.

We are not stupid.

We see that the government is being bought and paid for by the profiteers who are polluting our land and water and air for their own personal gain.

Our only recourse will be to vote you out of office ASAP if you continue to represent the profits of the few over the public good of the many.

Timestamp 1/18/2013 2:16 AM

Name carol olicker
City Fairfield
State Iowa

Providing comment on the following sections:

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

I just wrote to reiterate Jack Engstrom's comments but I neglected to fill in my city and state, so I am doing it this time.

Timestamp 1/18/2013 4:30 AM

Name Dale Escher
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Conservation practices are an expense to the land owner that is a long term benefit the waterways of the state. Cost sharing and a well planned science-based practice will assist the land owner to establish a program that will benefit the farm and the environment.

A voluntary program helps the land owner keep a positive attitude as to how he can contribute to protecting the land now and in the future.
Dale Escher

Timestamp 1/18/2013 4:30 AM

Name Jeffrey Chown
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 the Iowa Nutrient Reduction Strategy, a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

My fellow farmers and I believe voluntary conservation practices are the best way to protect water. We want to continue to be part of the solution, and support using ISU research to determine which practices are most effective when applied to Iowa s diverse landscapes. New costly one-size-fits-all regulations are not the answer.

I also ask you to support the adequate funding of the Iowa Nutrient Reduction Strategy, as well as the state s other conservation cost-share programs. Past failures to adequately fund these programs have delayed needed conservation projects.

Thank you for your service to the people of our great state, and for your work on behalf of Iowa's farmers and their stewardship of our natural resources. Jeffrey Chown

Timestamp 1/18/2013 4:30 AM

Name Sam Kenkel
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

through out the past 20 years farmers as a whole have been using less fertilizer, utilizing less ground for production and still growing more of a crop. what does this say for us" it says we are using our resources more wisely. as this nutrient reduction strategy is assesed and viewed from every angle the need for a scientific based examination that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production is extremely important. another important issue is that funds for the iowa nutrient reduction strategy as well as the state's other conservation cost-share programs. failure to adequately fund these programs in the past have delayed much needed conservation projects. Sam Kenkel

Timestamp 1/18/2013 4:30 AM

Name David McKechnie
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 urge you to support Iowa's Nutrient Reduction Stradegy and other cost-share conservation programs. I have used No-till, waterways and grass headlands for over twenty years. Funding for these voluntary conservation programs that are science based help get farmers to try them. Next year I plan on using cover crops on my more eriodable ground to help reduce nutrient losses. David McKechnie

Timestamp 1/18/2013 5:15 AM

Name Mara Winningham
City
State

Providing comment on the following sections:

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

I have seen first hand the damage caused by agricultural run-off. Streams where children once played are now off limits, choked with algae and foul smelling. This is where self regulation has gotten us.

Timestamp 1/18/2013 5:56 AM

Name Robert Donahoo
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 the states nutrient reduction study. It makes alot of sense to fund a project of this great of inportance to stay ahead of any further regulations that might come from the EPA that might hurt our strong agg in Iowa. Robert Donahoo

Timestamp 1/18/2013 6:47 AM

Name Mike Freiburger
City Dubuque
State Iowa

Providing comment on the following sections:

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

How come soil quality or better soil health was not addressed? good ways to increase the reduction is by maintaining nutrient and sediment on landscape.

There is no time line in how the reductions are to be achieve. or what will be achieve in a certain time frame>

Timestamp 1/18/2013 6:57 AM

Name Merle Witt
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

We as farmers value the land and want to keep it and leave it in a better state than it was when we started to farm. Our current voluntary conservation practices will benefit our farms and surrounding environment. Keep government out of it. Farmers do a good job today or they would not be farming or raising livestock anymore. Ihe industry has weeded out the farmers who didn't care and didn't do things right.

Again, I can not stress too much, support and fund the Iowa Nutrient Strategy plan. Thank you. Merle Witt

Timestamp 1/18/2013 7:03 AM

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

As a former county conservation award recipient I feel that farmers are the best stewards for the land they operate. Having voluntary conservation practices is a must for the future of our water quality and soil. Helping farmers with their voluntary practices with cost share programs is a must. Joel Thorson

Timestamp 1/18/2013 7:09 AM

Name Troy Watne
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am writing this in support of Iowa nutrient reduction strategy. This is a very important conservation piece but i feel it needs to be based on sound scientific research and also the ability to be a voluntary program and give farmers the chance to implement things that will work for their farming operations.Currently on our farm we do buffer strips along the Iowa river and creeks that flow to the Iowa river,we also implement some no till on land that is erodible to help control run off and soil eroison.we also started applying our nitrogen in the spring instead of fall and also in split applications to help in nitrate losses.Please keep this a voluntary program.I think we are doing a good job.Let us continue to help in this effort. Troy Watne

Timestamp 1/18/2013 7:09 AM

Name MARK MCGILL
City UDELL
State Iowa

Providing comment on the following sections:

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

I WOULD ENCOURAGE YOU TO SUPPORT THE PROGRAM FOR NONPOINT SOURCE NUTRIENT REDUCTION BECAUSE I AS LONG AS OTHER FARMERS ARE ALREADY APPLYING PRACTICES TO REDUCE THE RUN OFF FILLED WITH NUTRIENTS. I HAVE ALL WATERWAYS SEEDED 300 FEET ON EACH SIDE AND BUILT SEVERAL WATERSHED TO HELP ALSO. THANKS FOR YOUR SUPPORT WITH THIS PROGRAM. THANK YOU MARK

Timestamp 1/18/2013 7:13 AM

Name tim enderson
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 comment on why I support the Nutrient Reduction Strategy:

1. Cleaner water for our next generation, can't go wrong in letting the Ia DNR, ISU college of AG, run the show. Other states come to us for the latest.
2. Let the word out on what type of practices work best in different areas. Communicate I guess.
3. Most of all please adequately fund this program, To be the best doesn't come without a price tag! tim enderson

Timestamp 1/18/2013 7:14 AM

Name Brian Klemme
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 the science based nutrient reduction strategy. On our farm we are already utilizing conservation practices such as grass waterways and buffer strips. We even install and maintain them at our own expense on ground that we rent. Given the chance I think most Iowa farmers will voluntarily comply with guidelines. Brian Klemme

Timestamp 1/18/2013 7:21 AM

Name James Krull
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

We as farmer keep looking for ways to keep expences down with the price of fertilizer where it is no farmer will double the rate they use just for for the fun of it .

Equipment is being developed to put lesser amounts on poor soils and a larger amount on soil that will use more though growing crops , this is done with the use of GPS Equipment I also use injection Equipment to put it in the ground very close to where the crop will grow .

We keep testing use rates along with yields to minamize use the best we can .

The amount of nutrients applied per Bu. grown today is less than 10 years ago on my farm.

I will be looking every year to use less per bu. when I see it works , are freedom to use what works is what is making USA Farms as good as they are !!

Please Vote to keep that ability in the Farmers hands and not be regulated by another partys idea of what will work.

Thank you

Jim Krull , IA. Farmer James Krull

Name The Nature Conservancy
City Des Moines
State Iowa

Providing comment on the following sections:

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

Chuck Gipp, Iowa Department of Natural Resources

Bill Northey, Iowa Department of Agricultural and Land Stewardship

Nutrient Reduction Strategy

ANR Program Services

2101 Agronomy Hall

Ames, Iowa 50011-1010

Secretary Northey and Director Gipp:

Thank you for the opportunity to provide comments on the Iowa Nutrient Reduction Strategy Plan (hereafter the Plan). We commend Iowa s efforts to develop a comprehensive framework to address the state s contribution to the hypoxia issue in the Gulf of Mexico and to work to clean up Iowa s waterways.

The Nature Conservancy s mission is to conserve the lands and waters on which all life depends. We are a global nonprofit organization with a very local presence, having successfully worked in Iowa for the past 50 years engaging private landowners and local communities to conserve and steward Iowa s natural resources. Our vision in Iowa is to have healthy lands and waters and sustainable agricultural systems that support biodiversity and provide for the needs of people in Iowa and the world. The Nature Conservancy is a pragmatic organization that is grounded in science. For more than a decade, we have been actively working with partner organizations, stakeholders and private landowners throughout the Mississippi River basin to address altered hydrology and water quality issues that affect the upper basin as well as the Gulf of Mexico. In Iowa, this work includes our on the ground efforts to implement on-farm practices in the Boone River watershed to address soil health, water quality, and aquatic biodiversity and our work in the Cedar River basin focused on restoring altered hydrology and reconnecting the river to its floodplain, both of which benefit water quality. The Nature Conservancy s watershed work along with that of our partners in numerous other watersheds provides insight into what is working and what still needs to be accomplished. The lessons learned from these established watershed-based projects provide a foundation for scaling up to the state level.

The Nature Conservancy recognizes and applauds the ambitious goal set forth to reduce nitrogen and phosphorus by 45%. However, we feel the draft Plan needs improvement in order to provide a comprehensive framework to achieving this large-scale vision for Iowa s freshwater resources. To accomplish the objectives set forth in the Plan, change must occur much more quickly and to greater extent than previously achieved. This will require targeting of practices in priority watersheds to realize the greatest impacts, monitoring and measuring our progress, increasing traditional funding and creating new funding sources, improving our delivery of technical assistance and a better understanding the social barriers to adoption of best management practices. Success is going to be heavily dependent on federal farm programs so we need to influence the farm bill as well as the delivery of the resulting federal farm programs in Iowa. The objectives can be achieved but business as usual will not get us there a long-term coordinated effort between all stakeholders including farmers, municipalities, businesses and citizens is essential. The Nature Conservancy respectfully submits the following recommendations and comments and would welcome participating in further development of the Plan.

1. The Plan should include a list of the priority watersheds and develop clear time-bound outcomes with interim milestones. The Nature Conservancy acknowledges that a 45% reduction in nutrients cannot happen overnight. Identifying priority watersheds will ensure limited resources are spent in those watersheds that contribute substantially to the problem. The draft strategy also does not clearly identify outcomes or provide milestones for non-point source reductions. Iowa State University completed an extensive scientific assessment of best management practices which provides an excellent platform to identify short and long-term outcomes. Interim milestones allow for effective evaluation of tangible progress. The science assessment evaluated combinations of practices and estimated costs associated with these practice combinations which illuminates the magnitude of the problem and solutions. The Plan, however, only identified these practice combinations as examples, not recommendations. We believe the Plan should recommend the practice combinations specific to each priority watershed that cumulatively contribute to reducing the State s nitrogen and phosphorus contributions to the Gulf by 45%. Providing recommendations for priority watersheds in combination with milestones will substantially strengthen the plan and capture the significant value of the science assessment.

2. We encourage an analysis of the multiple benefits of practice combinations. The Plan does not consider additional benefits beyond nutrient reduction. The best management practices and land use changes identified in the Plan provide additional benefits including flood risk reduction, improved wildlife habitat, drought mitigation, increased recreational and hunting opportunities, increased grazing and haying opportunities, and soil health improvements. A cost-benefit analysis that looks at these additional benefits would provide a more robust assessment of practices. Cover crops provide a good illustration. Cover crops can reduce nitrogen and phosphorus run off by 30% or more but also improve soil health, decrease soil erosion, and increase water infiltration (especially important during drought years). In fact, deep-

Name The Nature Conservancy
City Des Moines
State Iowa

Providing comment on the following sections:

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

rooted cover crops may increase subsoil water holding capacity from 1.7 inches to 4.2 inches. These additional benefits may outweigh the cost from reduced corn yields providing an overall positive benefit to the producer.

The plan also encourages market-based approaches such as water quality trading credits. Credit trading has been effective in other parts of the country when there are regulatory caps on nutrient losses. But in Iowa, there may not be enough regulated point sources in a watershed to make credit-trading and other market solutions viable. However, there may be market-based opportunities to address nutrient reductions in watersheds if other societal benefits are also considered including flood risk reduction, soil health, recreational opportunities and wildlife habitat improvements.

3. Watershed level goals should be established in the Plan while specific practices are tailored to individual farms. The Plan assesses in-field and edge of field best management practices, but there is no mention of watershed scale practices such as retirement and restoration of frequently flooded agricultural land and integrated management frameworks (i.e. watershed management authorities). While the Plan describes the contribution of land use changes to the nutrient problem, there needs to be a discussion of the systematic solutions needed for land use changes to occur. Indeed the science assessment found that the most effective nutrient reduction practices were land use change practices. This requires looking at the watershed level, not just at the farm level. This does not mean implementation has to be mandatory at the farm level, but it does require analyzing new ways to provide incentives to groups of landowners at the right scale (such as at the drainage district scale) to solve the broad-scale water quality problems. This systematic approach can be best achieved with limited funds by implementing practices and land use changes that provide multiple benefits in other words, adopting an integrated watershed management framework.

4. We encourage an analysis of the social barriers to widespread adoption of best management practices. The proposed solutions (pilot projects, improved efficiencies, outreach and collaboration, increased public awareness and recognition and relying on existing funding sources) do not appear to be vastly different than the tools and approaches used over the last 20 years. The Nature Conservancy encourages a thorough analysis of the social barriers and triggers that are affecting the broad scale adoption of best management practices evaluated in the science assessment. If Iowa is going to be successful at reducing nitrogen and phosphorus loads with a voluntary framework, additional tools beyond financial incentives and cost-share programs are needed to compete with high commodity prices.

5. The Plan should establish baselines and commit to measuring and reporting annual loads such that we can evaluate our progress toward 45% reduction. Quantitative load estimates are being developed by the DNR's Geologic and Water Survey, USGS and University of Iowa for various monitored locations and can provide a platform for improving reduction goals and monitoring. We encourage the State of Iowa to implement an adaptive management framework, by setting interim goals, documenting the assumptions made with those goals, and evaluating on a regular basis as we move forward with implementation.

6. We suggest the Plan include a more thorough analysis of implementation costs as well as explicit funding opportunities and approaches. The Plan gives little mention to the magnitude of the funding disparity to implement at the scale needed to achieve a 45% reduction in nutrient loading. The cost analysis indicates between $1.2 and $4 billion is needed for initial implementation of the practices. The Plan specifies that initially Iowa will rely on existing funding sources (or reallocation of existing funding sources) to implement the strategy; however, at the same time the Plan recognizes that these funds are often limited and oversubscribed. Indeed, since 2002, state funding for water quality programs has dropped by 22%. It is not enough to be satisfied with the pace of implementation being subject to available funding. The Plan should include strategies for ramping up and at least doubling current funding for voluntary conservation incentives from the legislature over the next 10 years and prioritize how those funds will be spent.

With dwindling public sector resources, we need to look to the private sector to share the financial burdens. Agribusinesses and other businesses within the agronomic supply chain already are contributing to programs that address water quality problems. Coca Cola, Inc. has invested in water quality programs in the Upper Cedar watershed, supporting an 80 acre wetland restoration at the Brownville Wildlife Area near Osage, Iowa which captures water draining from 1,595 acres of cropland. Clean water and continued availability of corn syrup are not mutually exclusive for businesses like Coca Cola, Inc. In the Raccoon and Des Moines watersheds, Agriculture s Clean Water Alliance provides another example of the agricultural retail industry investing in water quality improvement solutions. These examples as well as polling data and the 2010 voter-approved establishment of Iowa s Natural Resources Trust Fund illustrate the people of Iowa care significantly about clean water and are willing to spend additional resources to address the problems. This Plan has an opportunity to shape and guide the creation of new investment opportunities and we encourage the State of Iowa to establish a framework to facilitate and encourage private investment into conservation practices.

Efficiency is identified as one means of maximizing benefits and The Nature Conservancy encourages improving the effective use of limited resources. The state s capacity to deliver programs and to provide technical assistance to farmers is at an all-time low. We are pleased to see the call for an expanded and enhanced public-sector initiative to assist farmers and a call for new and enhanced private-sector roles. Our experience in the Boone River watershed indicates that the private sector can work closely with the public agencies to provide enhanced delivery of programs.

7. We recommend the Plan explore opportunities for the State to influence federal policies that are counter to achieving water quality improvement. The US farm bill legislation provides a significant influence on the farming practices and we encourage the State of Iowa to support coupling conservation compliance to federally supported crop insurance and other federal support.

Name The Nature Conservancy
City Des Moines
State Iowa

Providing comment on the following sections:

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

The Plan is a first to bring together point-source and non-point source reduction into one document and Iowa is leading the Midwest in preparing a statewide strategic plan. The Nature Conservancy recognizes this document as a first step to developing a comprehensive plan. Establishing concrete objectives and goals, prioritizing watersheds, identifying funding sources and strategies to meet these goals are critical. The Plan establishes the Water Resources Coordinating Council (WRCC) as the entity that will operationalize the Plan and we encourage a more transparent and open dialogue with the citizens of Iowa as the WRCC establishes watershed priorities and develops specific objectives. The Nature Conservancy looks forward to working with the State and with stakeholders to address these pressing issues affecting the quality of Iowa s freshwater resources and the Gulf of Mexico.

Sincerely,

Jan Glendening

Iowa State Director

The Nature Conservancy

Timestamp 1/18/2013 7:24 AM

Name Kevin Green
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I have made the commitment on our farm that cover crops and terraces will be a permanent practice. Cost share programs have been helpful in implementing these practices , but much more is needed. I would invite you to our farm for a first hand look at manure application, cover crops and terraces at work. Kevin Green

Timestamp 1/18/2013 7:26 AM

Name Jeff Westrum
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 Iowa's Nutrient Reduction Strategy. I believe this is an important issue. I don't like seeing our excess nutrients end up in the gulf of mexico. Having conservation programs in place help give innitiative and ideas to what we as farmers can do to help. Terraces and waterways are some of the things we have do to reduce nutrient runoff. But there is always more that all of us can do, and with the state funding it is more likely that they get done. I thank you for taking the time to read this and hope you can make it happen. Thanks Jeff Westrum

Timestamp 1/18/2013 7:31 AM

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

On my farm I have implemented many voluntary conservation practices to protect our soil and water which include no-till planting, waterways, constructing terraces and ponds, variable rate fertilizer application, cover crops, crop rotations including hay and pasture, and moving my cattle feedlot into a covered hoop barn. I the future I would like to build more terraces and ponds which would be much easier with full funding of the state cost share program. I would also be interested in any new conservation practices that would protect the soil and water with implementing and funding of the Iowa Nutrient Reduction Strategy. Bryan Reed

Timestamp 1/18/2013 7:34 AM

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

Timestamp 1/18/2013 7:36 AM

Name Darren Stadtmueller
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am writing in support of the nutrient management strategy currently proposed by Secretary of Agriculture Bill Northey and the Iowa DNR.

This science based voluntary program will provide the flexibility that producers need to stay economically competitive while still helping the environment by reducing runoff. On my farm we are already using many of the practices promoted with this plan, such as strip-till and no-till tillage practices and banding of fertilizer. We also have established buffer strips near creeks and streams. Promoting these strategies and providing funding to assist producers in the implementation of conservation efforts is crucial. A top down one size fits all strategy developed in Washington DC will hamstring producers and endanger the United States role as the leading food and fiber producer in the world.

Please lend your support to the Northey/DNR plan. Darren Stadtmueller

Name Steva Haeflinger
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Voluntary conservation stratergy is a move in the right direction!

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

Some groups and individuals are already saying the Iowa Nutrient Reduction Strategy won t work. They believe voluntary conservation practices on farms do very little to protect water. They re calling for more regulation of farms, similar to the costly one-size-fits-all regulations imposed on farmers in the Chesapeake Bay area.

Farmers know better! We want to continue to be part of the solution, but know that new regulations aren t the answer. New regulations only stifle growth of our economy and encourage lawbreakers to find loop holes. Farmers are not bad people and want to maintain the profitability of our operations in a way that does not hurt the long term goals of passing on quality to our children. Steva Haeflinger

Timestamp 1/18/2013 7:53 AM

Name Calvin Rozenboom
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Citizens of Iowa expect and deserve modern conservation measures be adopted by those engaged in agriculture. I fully support the proposed science-based nutrient reduction strategy that recognizes the importance of voluntary conservation practices. Education and research are much more effective than one size fits all regulation.

Farmers in Iowa have proven over the last few decades that they are committed to conservation demonstrating the need for continued commitment for adequate funding from our legislators. We can successfully meet the expectations of all of Iowa if we work together.

The future water quality of Iowa and this nation is in our hands. Please consider how action on your part can deliver results Calvin Rozenboom

Timestamp 1/18/2013 7:57 AM

Name Douglas Nolte
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.

Make sure this program changes with different yield

goals in the future. We try to increase yields, those nutients may need to increase. I do not want this to restict our ablity to change yield goals in the future. Douglas Nolte

Timestamp 1/18/2013 8:00 AM

Name Justin Lain
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

No one knows Iowa agriculture better than Iowa farmers. It is important for Iowans to take conservation serious as the land is the backbone of our economy.
By using a science based approach to nutrient reduction it will best serve Iowa's farmers and protect our land and water. We can use conservation and other farming practices to show that we can meet guidelines while not harming our farming economy. My family uses contour no-till farming with terraces as well as split applied nitrogen practices. These practices need to be encouraged to farmers around the state.
Please fund the Iowa Nutrient Reduction Strategy to help farmers implement this program to help Iowa's economy. We simply can't afford to be pushed into new rules and regulations made by Washington. We can use Iowa based research and practices to control our own future with your funding. Justin Lain

Timestamp 1/18/2013 8:05 AM

Name Sue Brozik
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I believe that it is vitally important that we recognize the need for science based voluntary conservation practices. We as farmers know our land better than anyone and we know the best and appropriate places on said farm to implement the most effecient conservation practices to benefit everyone. It is for this reason that the state's other conservation cost-sharing programs need to be adequately funded. Voluntary conservation practices are the backbone of maintaining our state's agricultural production.

Thank you for supporting our state's farming families. Sue Brozik

Timestamp 1/18/2013 8:15 AM

Name Rodney Koch
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

The conservation cost share programs need to be funded to protect the land that we farm. I protect the land by ontill the ground that I farm and save the soil. Rodney Koch

Timestamp 1/18/2013 8:31 AM

Name Peter Seehusen
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Please continue to support programs that research and develop conservation practices. Along with supporting conservation practices PLEASE do not make any practices/programs mandatory or regulated by any state or federal agency. Urge farmers to volunteer for certain practices. No one knows their land and operation than the farmer or rancher themselves. Thank you for your service! Peter Seehusen

Timestamp 1/18/2013 8:35 AM

Name Brian Rohrig
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

As the need for food and fuel grows, I'm not sure agriculture will be able to reduce the amount of nutrients applied to the soil that are removed from the soil in our quest to feed and fuel the world.

However, if demand for food and fuel starts to wane, I would support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

If it is necessary to reduce nutrients applied per acre, I also urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state s other conservation cost-share programs. Brian Rohrig

Timestamp 1/18/2013 8:36 AM

Name Craig Sage
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I support the proposed science-based state nutient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. It is important for the Iowa Nutrient Reduction Strategy to be adequately funded, as well as the state's other conservation cost-share programs. Iowa's failure to adequately fund these programs in the past has delayed needed conservation projects. Over the last several years, we have added waterways to benefit our farm and the surrounding environment. We hope to do more in the future. Craig Sage

Timestamp 1/18/2013 8:37 AM

Name Jacque Hough
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

We in rural Iowa would like to see lawmakers support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production.

The Iowa Nutrient Reduction Strategy needs to be fully funded along with Iowa s other conservation cost-share programs. Our failure to appropriately fund these programs in the past has stood in the way of paying for needed conservation projects, and sometimes put the farmer in additional financial stress trying to pay for more on his own.

We, as Iowa farmers, are proud of our land and the ability to care for it the best way possible. With the ever tightening economic troubles we aren t always able to do as much as we would like. That in turn is why we need to fund the conservation cost-share programs along with studies and future conservation practices.

On our farm we have added terraces, waterways, ponds, planted trees/shrubs, tile, buffer strips above ponds and ditches. We have kept fence lines in and use the area for wildlife habitat. Would like to plant some more trees but with the drought we have put this off. Jacque Hough

Timestamp 1/18/2013 8:43 AM

Name Larry Besch
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I support the need science-based state nutrient reduction strategy and the need to continue the conservation practices already used by farmers.

There are rules and regulation already that are already used by farmers to ensure safe and sound use of a natural nutrient. Larry Besch

Timestamp 1/18/2013 8:50 AM

Name Ronnie Gruenhagen
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I encourage you to support the Iowa Nutrient Reduction Strategy, because it allows me to use the approach for my farm's reguirements and needs to achieve the best water and air quality. Ronnie Gruenhagen

Timestamp 1/18/2013 8:56 AM

Name Lee Ellickson
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I think we need to keep our farming practices contour minded so we save runoff . I think we need to look at the future of this frac sand mining as the fact they get with in 5 ft of the water levels at times . I belive this would have to biggest impact on water quality . As they are trying to get into Alllamakee county to mine this sand. Lee Ellickson

Timestamp 1/18/2013 9:13 AM

Name Jody Martens
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

My family and I support a science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production. It uses ISU research to determine which practices are most effective when applied to Iowa s unique landscapes. The strategy outlines these efforts in a scientific, reasonable and cost-effective manner.

We urge you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state s other conservation cost-share programs. Iowa s failure to adequately fund these programs in the past has delayed needed conservation projects. We've already taken highly erodible crop lands and turned them into pasture for our cattle, in part due to the cost sharing programs that allowed us to make the transition without a large financial burden.

The costly one-size-fits-all regulations imposed on farmers in the Chesapeake Bay area, would be detrimental to our small family run livestock operation. We're young farmers that try to be environmentally conscious and would like to grow our operation if we're able to do so without the heavy restrictions of government regulation.

Please enforce the laws that are on the books for the operations that are in violation of these laws, but please don't add costs to our business when we are already doing the right things. Jody Martens

Name Kevin Condon
City Des Moines
State Iowa

Providing comment on the following sections:

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

January 18, 2013

The Honorable Bill Northey
Iowa Secretary of Agriculture

The Honorable Charles Gipp
Director, Iowa Department of Natural Resources

Wallace State Office Building
Des Moines, IA 50319

Dear Secretary Northey and Director Gipp:

The 1,400 members of the Iowa Association of Business and Industry (ABI) care deeply about the environment as business and community leaders who have chosen Iowa as the place to call home. As traditional "point sources" ABI members have been watching with interest the developments surrounding the Nutrient Reduction Strategy (the strategy) that has been crafted by the two state departments you lead. ABI appreciates the efforts made by the Iowa Department of Natural Resources (DNR) and the Iowa Department of Agriculture and Land Stewardship (IDALS) to come together to develop one strategy to address the impacts that point and nonpoint sources have on the nutrient loads to Iowa waterways. ABI believes that accessible and safe water is a benefit to all Iowans and makes Iowa a more attractive place to live and do business.

On December 3rd, ABI President Mike Ralston wrote to you requesting an extension of the public comment period for the nutrient strategy as our members believed it was too aggressive at 45 days and overlapped the observance of three separate holidays. We appreciate the final determination to extend the deadline in order to allow for a more adequate review of the strategy documents. As with any effort of this magnitude, we understand that you have to start somewhere. After careful analysis of the strategy it seems clear to ABI that more work is needed to refine the contents and clarify certain aspects that will impact point sources significantly. I will do my best to outline ABI's initial comments on the plan and trust that the DNR and IDALS will seek further input and collaboration with industry members as the process continues in the lead up to implementation.

Recognition of the "Point of Diminishing Returns" Concept
In economics, the point of diminishing returns is, according to Merriam-Webster's Dictionary, "a rate of yield that beyond a certain point fails to increase in proportion to additional investments of labor or capital." The strategy put forth calls for point sources to incur an involuntary cost of $1.533 billion dollars in capital infrastructure and technologies with an annual operating cost of $114 million dollars. Iowa's employers and their employees along with every taxpayer served by municipal facilities are going to be asked to invest a great deal of resources in order to achieve their proportion (4% - Nitrogen, 16% - Phosphorous) of the 45% nutrient reduction goal outlined in the strategy. There must be an acknowledgement by DNR and IDALS that point sources are quickly approaching a scenario where additional "improvements" to treatment facilities will simply not be justified under any economic or environmental formula.

Place Emphasis on Regulatory Certainty for Point Sources
ABI members can appreciate the strategy's effort to create as much regulatory certainty as possible with such an expansive goal. Any assurances that DNR and IDALS are able to afford point sources during the implementation of the strategy will benefit the people and places where nutrient reductions are aimed. While the point source side focuses on ten year windows of regulatory certainty and twenty year windows of technology design life, the final strategy must consider "off ramps" for point sources when those windows close unexpectedly. Current legal, economic and political winds are tragically unpredictable and considerations need to be made about how any future developments may impact the feasibility calculations the DNR will utilize when issuing National Pollutant Discharge Elimination System (NPDES) permits.

To that end, NPDES permit expiration should be the only qualifying event for implementation of the nutrient strategy. Currently, NPDES permits may be amended prior to the five year renewal cycle for various reasons. When point sources are planning for production expansions that will increase nutrient loads, the imposition of nutrient limits is appropriate from a design and planning perspective. However, permits are routinely opened for a variety of minor issues, including changes in chemical additives or other minor production changes. Addressing the nutrient reduction strategy through NPDES permits should wait until the permit expires so that promised regulatory certainty and planning can be realized.
Further Revisions to Draft Nutrient Permit Requirements Language
ABI received a draft document from the DNR that was not available during the initial release of the strategy. The document was draft permit language that will be used to implement the nutrient reduction strategy in NPDES permits and was intended to provide some additional clarifications to questions surrounding the proposed nutrient reduction feasibility review process. This draft permit language describes how the permit holder will be required to study treatment technologies that would achieve significant reductions in the amounts of total nitrogen and total phosphorus discharged with a goal of achieving annual average mass limits equivalent to concentrations of 10 mg/L total nitrogen (TN) and 1 mg/L total phosphorus (TP) for plants treating typical domestic strength sewage. This language should be modified to also address plants treating wastewater with total nitrogen and/or total phosphorus concentrations greater than typical domestic strength sewage. In this case, the evaluation should include projected reductions in nutrient loads achievable with the application of economically and technically feasible treatment technology. A target percent reduction in nutrient loads could be included.

Similarly, the permit requirement language should be modified to allow for a "no action" outcome for facilities that find that their effluent is already at or below the proposed TN and TP limits. For facilities withdrawing surface water, ABI asks that discharges such as once-through cooling water be exempted from the limits, and that other discharges would be subject to the limit on a net-addition basis to account for existing concentrations in surface water.
Also, a discussion of timing would help affected facilities to understand the time frame that might be acceptable to DNR. We appreciate the flexibility provided for facilities to work with DNR to develop an implementation schedule, but guidelines on the timing would help facilities with planning. For example, if new construction is required, a facility could expect that new limits would not take effect until the NPDES permit

Name Kevin Condon
City Des Moines
State Iowa

Providing comment on the following sections:

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

renewal cycle that follows the first permit implementing the nutrient strategy. While ABI recognizes the unprecedented nature of this strategy, a measured approach needs to be underscored so as not to create a competitive disadvantage for Iowa industry.

Opportunity to Review Revised Nutrient Strategy
There will likely be significant changes to the draft strategy based on public comment. Therefore, ABI requests the opportunity to review and further comment on the revised draft strategy prior to final publication and implementation.

For example, ABI requests that the departments justify the inclusion of the industrial facilities not originally named in the strategy upon its initial release in November 2012. As of January 8, 2013, the online documents hosted by Iowa State University still had yet to reflect the inclusion of these facilities. The strategy doesn't clearly provide point sources the rationale used by DNR to include these facilities. Explaining this in the strategy would help clarify what formula or definition is being used to evaluate point sources.

Further guidance is also needed regarding what steps will be required of facilities following the initial discovery of nutrient concentrations above the threshold limits of 10 mg/L TN and 1 mg/L TP. ABI would appreciate clarification on who is responsible and qualified to perform nutrient level testing of point source discharge waters. It is unclear if DNR anticipates allowing facilities to perform testing using their own resources or if an independent contractor or third party will be required to perform the tests during the various stages of the strategy, should the nutrient threshold be surpassed at an individual facility.

Questions have also surfaced around the possibility of a retesting period following the initial discovery that a facility's effluent is above the established TP and/or TN threshold. There appears to be no indication of how DNR plans to approach situations where the nutrient threshold is breached by a narrow margin and might be found later to have been an anomaly based on follow-up testing. That is, the process that is put in place following the initial detection of the nutrient threshold should be one of verification followed by mitigation. Allowing point sources a reasonable period of time to swiftly correct marginally higher levels of nutrient load before retesting would be a positive development. ABI believes that there will be instances where the point source can more efficiently achieve compliance with the strategy if afforded an opportunity to adapt their internal treatment processes to meet the threshold before a verification testing would occur.

Another area of concern that should be addressed in a revised strategy document is whether point sources not listed in the strategy could be impacted as "indirect dischargers" if the point source is connected to a Publicly Owned Treatment Works (POTW) facility. According to the strategy, it is expected that most major municipal wastewater treatment facilities (>1 MGD AWW Flow) can economically meet technology-based TN limits of 10 mg/L and TP limits of 1 mg/L on an annual average basis with biological nutrient removal (BNR) technology. Industrial facilities that discharge to these POTWs may be affected by the strategy as indirect dischargers even though they are not on the point source list included with the strategy. Further clarification should be provided by DNR regarding whether it will take any action toward these indirect dischargers, or if it will be up to the POTW to determine whether changes to pretreatment limits will be required of facilities that discharge to their treatment plant.

Only Require Monitoring Upon NPDES Permit Renewal
To date, there are 148 point source facilities listed in the strategy. The State of Iowa currently has many more NPDES permit holders. It would be important for ABI members to have a better understanding of DNR's intended approach to the NPDES permit holders and other point sources that are not specifically named in the current strategy. ABI would like to know if there will be nutrient data collection requirements for all NPDES permit holders that could result in additional industrial facilities being required to implement the nutrient strategy.

The draft strategy listed 28 industries with biological treatment for process waste as those industries that would be required to implement the strategy. After the draft strategy was released, DNR added 18 industries to the list that are "major" under NPDES rules. However, it is unlikely that these additional industries have operations that result in significant nutrient loads. One interpretation of the draft would mean that the strategy requires each permitted facility to conduct a feasibility study during their permit renewal process. In the event significant nutrient loads are discovered during the feasibility study, the nutrient strategy requirements would then become applicable. Therefore, ABI again requests that DNR only require nutrient monitoring for these additional facilities at the time of their NPDES renewal following expiration.

Exploration of "Nutrient Marketplace" Warranted
ABI members were encouraged to learn some time ago that a process was underway and a partnership had been established by IDALS and DNR to produce a nutrient reduction strategy. ABI has long held the belief that any serious effort to remove nitrogen and phosphorous from Iowa waterways would require both point and nonpoint sources to be involved as proportional contributors to present day nutrient loads. While ABI will continue to review this strategy and its further development and implementation we must also recognize the potential opportunity that lies before this state. The strategy briefly mentions on page 17 "credit trading" under the section discussing the effectiveness of point source permitting. ABI members would welcome a deeper discussion about what a market based approach would look like.

To be clear, ABI is not endorsing the "credit trading" idea but we are intrigued by the prospect and willing to discuss how industrial point sources could contribute to that effort. Other states have unsuccessfully attempted similar approaches and without further development and input from the business community we would be concerned the Iowa strategy would suffer the same fate.

Topics for further consideration may include:

• Creating a system that allows public utilities to reduce their environmental compliance costs by contracting with agriculture to reduce nutrient loading.
• NPDES permit holder being allowed to minimize compliance costs through offsets and pollution reduction pooling among permit holders (point source to point source trading).
• Encouragement and promotion of trading and offset agreements without creating centralized "banks" or trading bureaus.
• Establishment of a mechanism for ABI and other point sources to monitor and comment on the nonpoint source nutrient reduction progress. Because nonpoint sources will not be bound by permits or regulatory requirements to reduce nutrient loads and because funding for nonpoint source nutrient reductions can vary significantly, ABI is concerned that nonpoint source reductions might not occur as outlined in the strategy.
• Transparency in the activities of the Water Resources Coordinating Council and Watershed Planning Advisory Council that will provide the State with ongoing information and expertise on cost effective nutrient reduction solutions.

Name Kevin Condon
City Des Moines
State Iowa

Providing comment on the following sections:

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

Again, thank you for your consideration of these initial comments on the nutrient reduction strategy. Although ABI had a designated representative involved in the strategy development, ABI members at large were not allowed to review the strategy until it was released publicly on November 19, 2012. We will continue to analyze the strategy and look forward to additional opportunities to provide input on the various sections of the plan that must undergo revision and further development. ABI stands ready to continue to contribute to the discussion of how point and nonpoint sources may successfully achieve the goal of nutrient reduction in Iowa.

Respectfully,

Kevin Condon
Director, Government Relations

Timestamp 1/18/2013 9:22 AM

Name Randall Nelson
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 you to support funding for the Nutrient Reduction Strategy program. The volentary practices that the Strategy will advance are much preferred to ones mandated by the federal government. As a farmer, I am concerned that a one size fits all, top down approach will in effect become a permit to farm. The choice of practices advanced by the Nutrient Reduction Strategy just make more sense. We have been long time participants with the NRCS and the FSA in building soil saving terraces, waterways, drop inlets with catch basins and no tilling the land. I believe that most farmers will, if presented the facts in a non threating way, will adapt those practices that fit their farms and existing structures.
Iowa farmers are very creative and early adaptors of techology. We are the envy of the world, as we have some of the best soils and are leaders in advancing new technology. My fear is that any alternative to the Nutrient Reduction Strategy will impede new technology and freeze Iowa agriculture in time. Iowa has a billion dollar surplus due to better State fiscal management and due to a vibrant agricultural sector. We need to get in front of this perceved problem and lead our way out, rather than be led from the rear by the Federal government.
It is clear to me that the State of Iowa must remain a leader in soil stewardship and the Nutrient Reduction Strategy is the best way to help Iowa farmers retain the soil and improve water quality. Please support funding for the Nutrient Reduction Strategy and other conservation practices. Randall Nelson

Timestamp 1/18/2013 9:28 AM

Name Edward Yarkosky
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

We need to support voluntary conservation practices that will help nutrient reduction strategy based on real science based research.

We need to fund this strategy with conservation cost share programs. If we don't keep these programs up we will fall behind and end up trying to push unnessary laws later down the road.

I my own farm I us a rotational program and try to keep my hill groung seeded down. I know that there are many things that we can do and research will help farmers make good decisions. Edward Yarkosky

Name Jonathan Brown
City Dubuque
State Iowa

Providing comment on the following sections:

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

The Iowa Nutrient Strategy is in real practical terms the first time the non-point (ag) and point source (Cities) communities have produced a document that with reasonable clarity identifies and agrees on the sources of the nutrients of concern. This is in itself a major breakthrough and the effort should be noted.

There are some real issues related to the fact that the point sources will be required to reach limits whereas the non-point sources the reaching of the goals is on a volunteer basis. I understand that in reality this approach may be driven by the fact that the Clean Water Act has no real authority over non-point sources. For the point sources to support this approach it would be helpful to have some assurance that if this strategy does move forward and if the overall goals are not reached that the point sources will not be required to do more. The point sources could spend millions, if not billions, remove all traces of nutrients and the real issue of nutrient loading to the Gulf from Iowa would not have been addressed.

An important consideration is that the standards proposed for point sources are quite reasonable in the major scope of things. By reasonable I mean that they are able to be reached using biological means without a heroic effort to remove that last bit of nitrogen and phosphorous. My reading indicates that the limits for point sources would be no more stringent than 10 mg/L for nitrogen and 1 mg/L for phosphorous and possibly less stringent.

Overall I support the Strategy with some reservations, mainly the non-numeric and volunteer approach for non-points. However with that said it is the opinion of most in the industry that nutrient limits will someday be imposed on the point sources and that the levels set under the Iowa Nutrient Strategy at least provide reasonable and achievable limits over an extended period of time to reach those limits. As stated above some assurance that point sources will not asked to reduce nutrient levels to even lower and more expense levels not be required if the reduction goals are not met by the non-point community.

Jonathan Brown

790 Caledonia Place

Dubuque, Iowa 52001

Name Eric Sytsma
City Oskaloosa
State Iowa

Providing comment on the following sections:

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

Drake Larsen said it better than I can, but I agree completely.

"I am writing in comment to the Iowa Nutrient Reduction Strategy draft, released November 2012. A state level stra...tegy focused on Iowa's water quality is greatly needed. The partnership forged between IDALS, IDNR and ISU-CALS is to be commended for taking the first step. I am confident that this partnership provides the critical institutional support required to assemble the diversity of stakeholders that needs to be at the table for the task of improving water quality in Iowa.
The draft document provides a thorough overview of the current science regarding water quality management practices. However, with respect to non-point source nutrients—namely those of agricultural origin—an actionable strategy is profoundly lacking. Understanding that structured decision making is an iterative process, the strategy draft can serve as a tool kit moving forward. Now we need a step-wise plan for getting these and other changes implemented. We need leadership for getting boots on the ground.
The draft is described as being a science and technology based approach, and indeed it is. Regrettably land management is inherently more than that. The authors from ISU-CALS overlooked multiple disciplines at their disposal that could have provided invaluable insight into the creation of a tangible nutrient reduction strategy. For example, within CALS there are professors of rural sociology that have published on the adoption of agricultural practices, on the diffusion of innovations, and even on watershed work in Iowa; their work is not cited, nor is there a plan for facilitating the widespread adoption of the practices discussed. Likewise, there are professors of ecosystem management; their work is not included in the draft nor are the tenets they teach even considered. Overall, the science regarding farmers and citizens was not included and these people are similarly ignored in the strategy.
The draft calls for a voluntary approach for ameliorating corn and bean agriculture's negative impact on water quality. The draft does not explain how this is different than what has been done in the past; an approach that has created the problems we currently face. I recently asked an Iowa farmer his thoughts on a voluntary approach, his response, "You do what you've done, you get what you've gotten." More plainly, a long-time Iowa Soil and Water Conservation District commissioner told me, "Voluntary doesn't work."
In discussion surrounding this draft document "voluntary" is often cast as an alternative to "regulation". This is a black-and-white fallacy that seems to have infected the NRS document as well. Between these two philosophies there is a lot of room for the state of Iowa to play a larger role in provisioning clean water for its citizens. Passively relying on voluntary action is no plan. The prioritization of watersheds and watershed resources coordination, outlined in the draft, is all for naught if the science of targeting is not followed through to the field level.
No individual's comments will contain the perfect formula for solving our water quality issues, which is why moving forward this process needs to be open to a diverse array of ideas from the whole spectrum of stakeholders, Iowans. I suggest the next draft include bigger, state-scale ideas along the lines of:
• state support for marketing the products of extended crop rotations and alternative agricultures
• property tax incentives for stewards of water quality
• state-of-the-art remote sensing for the targeting of high pollution source areas
• mandatory minimum width riparian buffers along all waterways
• an anhydrous ammonia tariff to fund wetland restoration and construction
• full funding of all existing water quality programs such as REAP and the Iowa Water and Legacy Fund"

Sincerely,

Eric Sytsma

Timestamp 1/18/2013 9:40 AM

Name Lindsey Larson
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 urge your support for a science-based state nutrient reduction strategy that focuses on voluntary conservation practices. I believe almost all producers have a conservation ethic instilled in them as farmers from a very early point in their careers. I have used many conservation practices over my career, including grassed waterways, buffer strips, terraces, hay ground and no-till planting. I have done these things because it is and will be the right thing to do for the present and future productivity of the land we care for. The other reason I have used these practices is because I believe I know best what will work on the ground I farm not some one who works under the guise of regulations that are the same for every farmer regardless of the land they are operating. Lindsey Larson

Timestamp 1/18/2013 9:43 AM

Name Tom Cheney
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am a fourth generation farmer that strongly believes in passing on the family farm. My main concern is protecting the soil and water quality so that the next generation can farm. I am currently using buffer strips along rivers and streams, and a vertical tillage program that leaves a high amount of residue on the grounds surface. I also use a hay rotation and fall cover crops to conserve soil erosion.

Farmers and land owners are very concerned with land stewardship and need to have programs available to use such as cost-share, and the Iowa Nutrient Reduction Strategy. Please protect farmers against expensive blanket regulations with funding for voluntary conservation programs.

Sincerely,
Tom Cheney Tom Cheney

Name John Cook
City Carroll
State Iowa

Providing comment on the following sections:

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

Externalized costs are being unfairly passed along to me and to all Iowans and to some of those beyond our state's borders. Inadequate laws and inadequate enforcement of existing laws allows some farm owners to avoid responsibility for controlling pollution that travels beyond their property.

Water pollution is an externality that has real costs. I'm on rural water, and the additional cost of treating polluted water shows up on my bill. Nutrient runoff from farm fields increases treatment costs everywhere downstream, whether it's Dedham, Coon Rapids, or Des Moines. Water pollution reduces the recreational value of our streams and rivers, and it continues on downstream through the Missouri and Mississippi watershed all the way to the Gulf where it causes real economic harm to fishery resources.

Nonpoint source water pollution comes both from livestock operations and row crops. There needs to be stronger permitting standards and strict enforcement to stop runoff from CAFOs and manure spills. Don't allow manure to be spread on frozen ground or soybean fields. There also needs to be better enforcement of conservation measures such as stream buffers, grassed waterways, and keeping cattle out of waterways. Voluntary measures are not enough. There may be things the state could do to provide a carrot as well as a stick to encourage good practices, perhaps through property tax adjustments. Increase tax on ag land, then forgive the increase when the approved practices are used. Also, tax the portion of farm land at a lower rate that is in conservation practices, not row crops.

Implementing effective policies will require much more effort by the state than it has demonstrated yet -- more funding and more staff for the DNR. Those funds should come from those contributing to the pollution via property taxes on ag land and permit fees for CAFOs.

Thank you for considering my input.

Timestamp 1/18/2013 9:47 AM

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

Name John Dunn, Director, City of Ames
City Ames
State Iowa

Providing comment on the following sections:

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

On behalf of the City of Ames, please find below comments on the draft Iowa Nutrient Reduction Strategy:

1. The State of Iowa should be commended for taking action to ensure that science-based nutrient standards are adopted within the state; and for proposing an approach for point sources that appropriately balances the cost with the benefit. The draft Strategy for the first time merges point sources and non-point sources into a single environmental strategy, and the State is to be applauded for doing so. We also appreciate that the strategy was developed specifically to fit within existing statutes without the need for additional rules or statutes; another area for which the State should be commended.

2. Municipal systems are already facing the combined impacts of changing stream designations, increased wet weather modifications, and aging infrastructure. Adding nutrient standards will be an exceptional increase to the burden of unfunded mandates forced upon local utilities. The ability of Iowa s sewer rate payers to continue to absorb large dollar increases is limited. The focus on point source nutrient reduction comes at an estimated $1 billion in capital outlay by municipal wastewater systems that in many cases are already struggling to finance other infrastructure needs.

The City of Ames has just completed a long-range capital plan for its Water Pollution Control Facility; which in part, included a conceptual plan to modify the facility to achieve the nitrogen and phosphorus standards included in the Strategy. That evaluation yielded a cost estimate of $22.4 million of capital costs (in 2012 dollars) plus an annual operating expense of $1.4 million. To put the cost in perspective, the Ames Sewer Utility had annual revenues in FY 2011/12 of $6.4 million. Implementation of the nutrient strategy will necessitate an estimated 55% sewer rate increase; 33% increase to cover the debt service, and an additional 22% increase to fund the annual operating and maintenance expense.

Before the state proceeds with enacting the point source nutrient reduction strategy as proposed, we recommend that the State affirmatively declare that nutrient reduction is the best possible use of these funds, and publicly acknowledge that the investment in nutrients may come at the expense of other improvements to the state s wastewater infrastructure. We also recommend that the efforts to secure funding for nutrient reduction projects be expanded in the Strategy document to include point sources as well as non-point sources.

3. We would like to express concern about the Strategy s ability to achieve the overall target for a 45% reduction in nitrogen and phosphorus loading. The strategy seems very heavily weighted towards addressing point sources through the imposition of mandatory limitations and timelines, while the non-point source approach relies entirely on voluntary implementation. Iowa s largest communities are going to spend an exceptional amount of money over the next 20 years to achieve a comparatively small reduction in the total nutrient loading to Iowa s rivers and streams. In comparison, it appears there is a substantial amount of money proposed to be spent on further research on the non-point sources, with very little assurance of any meaningful reduction in the much larger contribution of nutrients coming from non-point sources.

At the December 14 public meeting in Ames, a comment was made that for the non-point source community to achieve the targeted reductions will require a very high rate of adoption of a full suite of best management practices. The presenter went on to say, This will not be easy, but is it not impossible. What was missing from the remarks was whether the State believes that it is *reasonable* to assume such a very high adoption rate for non-point sources without any mandatory requirements. The State clearly felt that relying on voluntary adoption by the point source community was not a viable approach, and it is counter-intuitive to assume that the non-point community would be more prone to voluntary adoption.

We noted wording in the draft Strategy that contemplates additional future tightening of nutrient standards for point source discharges. We have a concern that if the non point source strategy is not effective in achieving the targeted nutrient reductions, focus will again return to the point sources. We strongly believe that, once this strategy is adopted, no further future nutrient removal burden be placed on Iowa s wastewater agencies unless and until the non-point source community achieves the nutrient reductions set out in the draft Strategy.

4. As the strategy moves from a conceptual plan to real-world actions, we strongly urge the State to consider municipal stormwater discharges as a de minimus source for nutrient loadings. These are comparatively much smaller contributors, and would face an exorbitant expense to try to capture and control nutrients. A more cost-effective approach for municipal stormwater would be to legislatively grant cities

Name John Dunn, Director, City of Ames
City Ames
State Iowa

Providing comment on the following sections:

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

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the local authority to regulate the application of fertilizer within their corporate limits.

5. The 10-year moratorium on imposing more stringent nutrient limitations once a point source constructs its Biological Nutrient Removal (BNR) system is an important element of the proposed strategy, and absolutely needs to be a part of the final point source approach. Because of the cost of achieving these standards, most communities will need to utilize some form of debt financing to afford the capital improvements. The typical term for revenue abated General Obligation bonds is 12 years, and the term for a Clean Water State Revolving Fund loan is 20 years. Utilities need an opportunity to pay off their initial investment before being forced to take on additional debt. In its comment letter dated January 9, 2013, US EPA recommends that an exception to the moratorium be included in the strategy. The issue of federal deference to the Iowa moratorium is still unresolved, and we would encourage the State to continue to zealously preserve the State s right in conversations with the US EPA.

6. During informal conversations with our consultants, an Iowa DNR staff person suggested that communities like Ames that have proactively evaluated the impact of nutrient removal improvements could be placed on an accelerated construction schedule, simply because & they won t require as much time& to evaluate necessary improvements. We believe quite strongly that there should be no penalty for communities like Ames who have started their evaluation into nutrient reduction alternatives ahead of the mandatory timelines proposed in the strategy. To do so would send a message to communities that your best strategy is to drag your feet for as long as possible, which is counter to the goals of environmental protection and water quality improvement.

7. The US EPA raised concerns in its comment letter that the approach being recommended by Iowa & does not reflect EPA s current thinking about numeric criteria development and implementation. This is concerning because it raises the specter of a utility spending millions to comply with a state requirement, only to have an even more stringent federal requirement imposed soon thereafter. We urge the State to work with stakeholders and the US EPA to confirm a nutrient reduction strategy that is acceptable to EPA before any facility undertakes such an exceptional capital investment.

With the above qualifications we offer our support for the proposed plan. Thank you for the opportunity to provide our comments and observations. We look forward to an opportunity for additional discussions as the strategy moves forward.

John R. Dunn, PE, MBA

Director, Water and Pollution Control Department

City of Ames

515-239-5150

jdunn@cityofames.org

Timestamp 1/18/2013 9:50 AM

Name Jeffrey Hinnah
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Jeff and I as farmers encourage you to please continue with a voluntary approach of conservation practices that are knowledgable and innovative for solutions to reduce nutrient flow without affecting Iowa's economy and agricultural production. As Iowa farmers we have a strong history of good conservation practices and are doing many currently. And who best knows what works on Iowa's soil and unique landscape then farmers. We know you already agree with us on this point.
But what we do need your support on is to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state s other conservation cost-share programs. There can be no delay in Iowa taking control of this situation before the federal government does! Jeffrey Hinnah

Timestamp 1/18/2013 9:51 AM

Name Aaron Mefferd
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 farmers are trying to do their best to try and limit the nutirient runoff. Some are taking conservation methods, while others are using variable rate for fertilizer usage to not over do it on area's that don't need as much as others. Some farmers are leaving more trash on the ground to help filter the water and nutrients to stay in the ground and not get into the ground water. We don't believe that the state needs to come in with more regulations as today's farmers are trying there best with different tactics to reduce the amount of nutrient runoff as they can.

The American farmer is aware of what needs to be done and is trying their best to help solve the situation. Aaron Mefferd

Timestamp 1/18/2013 9:52 AM

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

Timestamp 1/18/2013 9:55 AM

Name Jerry Peckumn
City Jefferson
State Iowa

Providing comment on the following sections:

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

Iowa rivers are badly polluted from runoff and the drainage tiles. Much could be done with better nutrient management, tillage management, and targeting funding to permanent perennial cover on fragile parts of the landscape. Better protection of green belts and in stream restoration would also help. Relying on voluntary conservation has not helped, we must hold the source of pollution accountable. There has to be some standards that must be met and bad practices stopped.

The EPA should.be involved managing Iowa's water. Our goals should be rivers that are healthy for are life.

Timestamp 1/18/2013 10:02

Name Leroy Lippert
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. Leroy Lippert

Timestamp 1/18/2013 10:03

Name Ronald Davidson
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I have had a life long dream of farming the familly farm and thankfully it is a reality. I would like to think that with science-based strategies for nutrient reduction that the future is as bright for my young children. Fully funding the Iowa Nutrient Reduction Strategy is a step closer to making that possible. Ronald Davidson

Timestamp 1/18/2013 10:04

Name Erik Oberbroeckling
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

My family operates a row crop farm in Northeastern Iowa. I would like to encourgage you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's other conservation cost-share programs. Along with that, I would like to see a science based reduction strategy that encourges voluntary conservation practices. Thanks for your consideration in this matter. Erik Oberbroeckling

Timestamp 1/18/2013 10:07

Name Kurt Alvine
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 make conservation a priority this session by adequately funding the states nutrient reduction strategy as well as the states other conservation cost share programs.

Thank you for all you do for Iowa. Kurt Alvine

Timestamp 1/18/2013 10:10

Name Practical Farmers of Iowa
City Ames
State Iowa

Providing comment on the following sections:

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

Practical Farmers of Iowa (PFI) has been a leader in farmers teaching farmers practical strategies to improve their financial security and environmental stewardship. Our farmer-to-farmer strategy works because we have an open, supportive and creative culture at our events, on our list serves and in our research and demonstration efforts.

Farmers coming to learn from PFI often commit to make a change, a change that might be uncomfortable and that definitely is not business as usual. Most farmers begin with on-farm research to learn how a new practice fits into their farming system. Then as they demonstrate change on their farms, they have the opportunity to share their changes with neighbors and other farmers. Iowans attending PFI events, including Farminars, in 2012 numbered more than 5,000. Nearly 2,000 pay their hard-earned dollars to be part of our organization.

There are 90,000 farmers in Iowa. The majority of these farmers are going to need market solutions, policy changes and more to meet the 45 percent nutrient reduction goal. The Strategy's authors need to take a hard look at the Science Assessment and realize that a corn and soybean duo-crop production system is inherently leaky. The Strategy's authors must commit to actually changing the duo-crop system so that it is less polluting. Do not rely on edge of field practices alone. To accomplish these landscape changes a mix of state policy changes, market solutions and much more will need to be used to change the cropping system.

The Strategy's authors need to take leadership and actually suggest goals, timelines and indicators of success based on the strategies they can employ. Below we have provided an example strategic plan with a goal, strategies, objectives and most importantly yearly work plans with measurable outcomes to ensure successful execution and accomplishment of the overall goal. We recommend that these types of activities be carried out because they work at changing the duo-crop system at the scale appropriate to achieve landscape-scale results. The Science Assessment confirms that these landscape level changes are critical to reach the 45 percent reduction goal. We recommend the Strategy's authors rework the current version of the Iowa Nutrient Reduction Strategy and emphasize strategic planning in the final draft. A final strategic plan should be given a comment period also so that the actual work to be conducted can be scrutinized by the public stakeholders.

Goal: Decrease Iowa's Nutrient Loading to the Gulf of Mexico 45% at the end of 2017

Strategy 1. Use the strong private/public ag sector relationship to create a market for small grains/perennial forages in Iowa

Objective 1. Current buyers (5) of corn and soybeans commit to modest increases in their purchases of Iowa grown small grains/perennial forages which become substitutes for corn and soybeans

Year 1. Make Trade Deals in Iowa---provide economic analysis resources to 5 end-users who commit to including small grains/perennial forages in their business model; Example: feed mills substitute small grains/perennial forages in the standard hog ration

Year 2. 1% of Iowa acres sold as small grains/perennial forages(In 2012 was 0.4%)

Year 3. 10% of Iowa acres sold as small grains/perennial forages

Year 4. Maintain 30% of landscape as small grains/perennial forages through mature markets

Strategy 2. Use creative incentives to increase acres of cover crops

Objective 1. Corn and soybean seed companies increase use of cover crops on seed production acres

Year 1. Create marketing materials for seed companies; Ex: □ Seed Company Q doesn□ t farm naked in Iowa anymore; by 2017 all our companies corn and soybean seed acres will be covered with cover crops.

Year 2. 5% coverage of seed acres with cover crops

Year 3. 25% coverage of seed acres with cover crops

Year 4. Maintain 50% of seed acres with cover crops

Strategy 3. Use tax policy changes to incentivize farmers growing third crops/cover crops/perennial forages

Objective 1. Landowners receive tax credits when adding a cover crop; greater tax credit when adding a third crop and even greater with perennial forages

Year 1. Work with 5 county supervisors to change tax incentives to reduce offsite soil erosion clean-up bills; use money for tax credits

Name Practical Farmers of Iowa
City Ames
State Iowa

Providing comment on the following sections:

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

Year 2. Work with 10 new county supervisors

Year 3. Work with 25 new county supervisors

Year 4. Work with 40 new county supervisors

Strategy 4. Use tax policy changes to incentivize written farm-conservation management plans (including soil, water, and habitat components)

Objective 1. Landowners receive tax credits when developing a written conservation plan and implementing it; greater tax credit when adding perennial land cover (including cover crops)

Year 1. Work with 10 county conservation districts & county supervisors to create conservation tax law program rates

Year 2. Work with 25 county conservation districts & county supervisors...

Year 3. Work with 50 county conservation districts & county supervisors...

Year 4. Work with all county conservation districts & county supervisors...

Thank you for your consideration. We look forward to hearing back from you with reaction to our comments.

Thank you PFI Policy Committee and the Research and Policy Director,

Nathan Anderson

Rick Hartmann

Fred Kirschenmann

Jeff Klinge

Laura Krouse

Jerry Peckumn

Ann Robinson

Dan Specht

Francis Thicke

Sarah Carlson

Drake Larsen

Please note: These comments were submitted from the PFI Policy Committee and not the organization as a whole. Practical Farmers of Iowa includes a complete cross section of Iowa farmers large and small, conventional and organic, two-year rotations and seven-year rotations, grass-based systems and more. It is highly likely PFI members not on the Policy Committee would have different opinions we have encouraged all members to submit comments on their own.

Name John North
City Cedar Rapids
State Iowa

Providing comment on the following sections:

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

Iowa Association of Water Agencies

January 17, 2013

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

John Lawrence
Iowa State University
132 Curtiss
Ames, IA 50011

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

RE: Iowa Nutrient Reduction Strategy

Gentlemen:

This is to provide the Iowa Association of Water Agencies (IAWA) comments regarding the Iowa Nutrient Reduction Strategy (Strategy). IAWA's membership is comprised of municipal and rural drinking water utilities that serve a population of 10,000 or more. Collectively, our member utilities provide drinking water to approximately 1.2 million Iowans.

IAWA and its member utilities recognize both the need for and the benefits that will be realized with the reduction of nutrient loadings to Iowa waters. The targeted 45% reductions of nitrogen (N) and phosphorous (P), if achieved, will not only reduce nutrient loadings to the Gulf of Mexico but will also greatly enhance the quality of the state's water resources and their beneficial uses for all Iowans. Consequently, IAWA generally supports the Iowa Nutrient Reduction Strategy. Although supportive, IAWA does have some reservations and comments regarding the proposed Iowa Nutrient Reduction Strategy and its implementation.

IAWA commends and is generally supportive of the Strategy based on the following considerations:

• IAWA recognizes the need for and benefits to be realized from the implementation of the Iowa Nutrient Reduction Strategy. IAWA considers the Strategy to be a "small, first-step in the right direction" of enhancing and protecting Iowa's water resources.

• The Strategy and accompanying documents provide a good overview of the nature
and scope of the current nutrient loading challenges in Iowa as well as the challenges we will face in the efforts to achieve meaningful reductions from both point and non- point sources.

• IAWA commends the stated commitment to develop an integrated plan that is based on sound science and attempts to incorporate factors such as best available technologies and cost-benefit analyses.

IAWA would also offer the following observations and concerns as well as suggestions that we believe will strengthen and facilitate a better understanding of the need and benefits of the Iowa Nutrient Reduction Strategy:

• IAWA notes that the Strategy document has just a few limited references to the local water quality benefits that will be realized with the reduction of nutrient loadings.
We believe that the Strategy document should include additional discussion regarding
enhanced water quality and its benefits for drinking water sources, recreational and aquatic habitats. The Strategy should stress that these "local" benefits will also provide an enhanced quality of life and economic benefits to all Iowans. IAWA offers to provide a representative to serve on the Science Advisory Panel or other stakeholder group organized for future discussions, establishing goals and setting timelines.

• Based on the contribution of nutrients, the Iowa Nutrient Reduction Strategy would appear to require point sources (large municipal and industrial NPDES holders) to provide a disproportionate percentage of the stated nutrient reduction goals. The targeted reductions goals are fairly explicit and will be extremely expensive to achieve. These costs will be borne directly by the municipal utility rate payers and the affected industries. We believe the Strategy should more fully recognize the burden that will be borne by industrial and municipal point sources.

• Similarly, the Iowa Nutrient Reduction Strategy is somewhat vague regarding the extent of the nutrient loading reductions needed to be achieved by non-point sources and the proposed plan of action in the event that the proposed voluntary actions fail to achieve the targeted reductions.

• Per the Strategy document, the current respective contribution by point and non-point sources of nutrient loadings to Iowa waters is as follows:

****

Nitrogen Phosphorus

Name John North
City Cedar Rapids
State Iowa

Providing comment on the following sections:

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

Estamated Total Tons per Year-All Sources 275,000 tons/yr 13,563 Tons/Yr
Point Sources (Municipal and Industrial) 8% 20%
Non-Point (Agriculture) 92% 80%

****

The document also indicates that full implementation of the Strategy will achieve the following approximate reductions of the nutrient loadings from point sources:

Point Current Targeted Projected
Sources Contribution Reduction Overall Reduction
Nitrogen 8% 66.7% 5.4%
Phosphorus 20% 75.0% 15%

****

The above exercise illustrates that targeted reduction goals for point sources would only provide a small percentage of the overall 45% reduction goals for both nitrogen and phosphorous. In fact, elimination of all nutrient loadings from point sources would only provide for an overall reduction of 8% for nitrogen and 20% for phosphorous. The math and economics of the nutrient loadings dictate that the preponderance of the needed reductions to fill "the gap" will have to come from non-point sources. Unfortunately, the Strategy document does not fully address the mechanisms or timelines for achieving the reductions needed from non-point sources.

We hope that these comments and suggestions will be helpful. Thank you for your consideration.

Sincerely,

(Unable to insert elecronic signature)
Signed copies will be sent to all recipients

John North
Executive Director, on Behalf of the Board of Directors
Iowa Association of Water Agencies

Cc: IAWA Board of Directors and Member Utilities

Mr. Chuck Gipp, Director,
Iowa Department of Natural Resources

Mr. Bill Northey, Secretary of Agriculture
Iowa Department of Agriculture and Land Stewardship

Iowa Association of Water Agencies
2201 George Flagg Parkway, Des Moines, Iowa 50321
319-377-3104 jnorth7304@aol.com

Timestamp 1/18/2013 10:11

Name Rose Danaher
City Homestead
State Iowa

Providing comment on the following sections:

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

First of all, I would like to commend the nutrient reduction strategy partners for their hard work to improve water quality for Iowans and our downstream neighbors. I believe the strategy is an excellent start and something that will be beneficial to all Iowans.

I think there should be a greater discussion about voluntary conservation practices for Iowa farmers and how effective they are. Today s programs have a lot of success and there are good things happening on Iowa farms every day, but they aren t all inclusive and they haven t been enough to prevent bacteria contamination and extreme soil and nutrient losses. The strategy seems to infer that Iowa agriculture will make widespread changes in cropping practices as a result of the new plan. This hasn t happened in the past, and I can t see the changes being made on the land because it was put on a piece of paper. How are we going to reach out to the landowners and get these reductions accomplished?

I would like to see the strategy have a greater focus on watershed-based projects, which is a proven plan that works. In smaller watersheds (HUC12), conservation practices and water monitoring can be targeted to show reductions. We can learn from this. Are the models correct do these practices really have a significant impact on water quality? These are questions we need to answer, but the only way to do it is to get more practices on the ground and monitor(quantify!) the changes in water quality.

In the plan I saw only one reference to the potential impacts of failing or non existing rural septic systems. Some county sanitarians have estimated that 50% or more of rural septic systems are not up to code and have an impact on local water quality. While not a truly non-point source problem, it usually gets thrown into NPS planning and should be addressed.

Education for landowners, homeowners and citizens who drink, play, farm and live alongside Iowa s waterways is essential. Each surface intake, waterway, old basement or barn drain, and storm sewer is a straight pipe for pollutants to enter our streams and rivers. Without further education on the impacts to water quality, I m afraid we won t see the improvements that we hope for.

Thank you for taking the time to consider my comments, I hope the revised proposal will address some of these issues in depth and come up with a concrete and implementable plan to improve Iowa s water quality.

Name Tom Hebert, transmitting on behalf of
City Washington
State District of Columbia

Providing comment on the following sections:

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

January 18, 2013

The Honorable Bill Northey, Secretary

Iowa Department of Agriculture

c/o

Nutrient Reduction Strategy

ANR Program Services

2101 Agronomy Hall

Ames, Iowa 50011-1010.

Re: Comments on the Draft Iowa Nutrient Reduction Strategy

Dear Secretary Northey,

The undersigned national and state agricultural organizations and businesses strongly support profitable, sound and effective nutrient management that successfully protects ground and surface water quality. We are committed to applying the best possible science and economics to the goal of achieving optimal production and nutrient use efficiencies while meeting environmental needs and responsibilities. We find the draft Iowa Nutrient Reduction Strategy (Strategy) to be perhaps the most comprehensive state effort ever to address the complicated interplay of the multiple challenges that must be addressed to achieve this goal. The undersigned also are strong supporters of state-led efforts to protect water quality by working with agriculture and municipal and industrial dischargers. It is only at the state level and below where the full and proper range of considerations and understanding can be brought to bear to create sustainable and effective programs. We commend Iowa for fully stepping up to this challenge. We welcome and appreciate this chance to offer these comments.

We strongly support the basic premise of the Strategy: water quality and nutrient load reduction goals must be pursued in the context of the best scientific, technical and economic considerations possible. Only then can we be confident that we are pursuing achievable and practical objectives. The fact is, as this Strategy demonstrates, major agricultural nutrient load reductions and significant water quality improvements can be achieved in Iowa. But these reductions and improvements are most definitely not unlimited, something that the Strategy also clearly demonstrates. Farmers and ranchers can embrace strategies that set aggressive goals and require significant changes in the way they operate or in how their operations affect the landscape. But this is only possible if these strategies are fully grounded in good science and economics that dictate achievable goals and with clear evidence that practical, reasonable work and sacrifices will actually help the environment. We strongly encourage Iowa to continue to rely on this basic premise to guide its subsequent efforts to finalize and then implement this strategy.

We also believe that a major strength of the Strategy is that it was developed through a "bottom-up" rather than "top-down" approach and reflects an extensive dialogue between the agricultural and municipal wastewater interests. This approach should help Iowa avoid counterproductive and fruitless finger pointing and will allow the state and these parties to get down to the hard and practical work of pursuing achievable nutrient load reductions that can really help water quality.

The undersigned organizations have come to the conclusion that, in the case of agriculture, achieving the goals and objectives outlined above will involve efforts under three broad categories of nutrient management: increasing and optimizing nutrient use efficiency on farms and ranches in the crop production season, retaining nutrients on farms and ranches that are not used in a growing season, and capturing those nutrients that do leave the farm through the use of green infrastructure downstream. We note that the Strategy clearly recognizes the role and importance of measures in all three of these categories and support the Strategy s work to properly understand their benefits and costs.

The Strategy briefly addresses important gaps in data and research that made it necessary for the scientists and economists involved to adopt certain critical assumptions to allow analytical conclusions to be reached. We wish to emphasize that there is a considerable body of knowledge regarding nutrient management practices capable of increasing nutrient use efficiencies without sacrificing yields and that these studies have important implications for the load reductions possible through incorporating suites of these practices into an on-farm nutrient management system. We encourage you to build on your existing scientific analysis to consider additional available nutrient management

Name Tom Hebert, transmitting on behalf of
City Washington
State District of Columbia

Providing comment on the following sections:

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

practices. The final Strategy should include further discussion of these existing data gaps, their implications for additional nutrient loss reductions, and identification of needed research. We are ready to work with you to assemble the best science and adaptive approaches so that you could review the science and take it into account in the final Strategy. We believe advancing nutrient efficiencies without sacrificing yields should be prominently incorporated in the final assessment and implementation plans.

Thank you once again for this opportunity to comment on the Strategy. As we state above, the Strategy is among the most authoritative state efforts ever to comprehensively identify and chart a responsible and achievable course of action that will substantially reduce nutrient loads and protect water quality. Clearly, an enormous amount of high quality effort has gone into its development. We look forward to Iowa's responsible and innovative use of this work to help farmers and ranchers profitably optimize nutrient use and management to protect water quality, and achieve optimal yields and harvests. This effort is fully consistent with and advances US agriculture's commitment to providing a growing world with the agricultural products they demand and need.

Sincerely,

Agricultural Retailers Association

American Farm Bureau Federation

CropLife America

GROWMARK

National Cattlemen's Beef Association

National Corn Growers Association

National Council of Farmer Cooperatives

National Pork Producers Council

National Turkey Federation

PotashCorp

The Fertilizer Institute

United Egg Producers

U.S. Poultry and Egg Association

Wyoming Ag Business Association

Timestamp 1/18/2013 10:14

Name John Gotz
City Ankeny
State Iowa

Providing comment on the following sections:

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

I have great issue with the idea throughout the document that voluntary compliance is going to solve our problems in both point source and nonpoint source pollution. There exist this great idea that the market is self correcting and all issues will eventually work themselves out if we only let them. That only works if the problem is a cost to business in the first place. Businesses in America has always found a way to exploit the environment for their own purposes and leave the cost of reconstruction and cleanup to the public sector. So as long as there is no significant cost to business there is no concern to change their ways, no voluntary compliance. Altruism in business is only present if it yields significant profits to the bottom line.

History repeatedly shows us that business will take the path to greatest profit, ie Massey energy and the Upper Big Branch Mine, BP's Deep Water Horizon, Bernie Madhoff's ponzi scheme, The recent Housing Scandal. I could fill pages with examples but you get the point. Business does not take the path to the greatest good of the people and/or the environment.

The thought that somehow Iowa farmers are voluntarily going to reduce contaminant runoff from their farms is unrealistic. In This age of high crop prices farmers are plowing to the very edges of their fields; putting in more efficient drainage systems; taking out all unnecessary fence rows; clear cutting every plowable inch of land and some that are not so plowable; increasing the yield per acre by planting closer together and fertilizing heavier; planting back to back years with corn and fertilizing more. Ag support business fertilizing fields while strong winds scatter their spray over adjacent acreages and waterways. This increases pollutants into our waterways. If farmers were self policing we would not be having this conversation they would have already taken care of their own nonpoint pollution and not be doing what is listed above. Granted there are farmers who have cleaned up their pollution and they are to be commended, but they are the minority. I'm not trying to put the Iowa family farmer down, they have had a tough go of it, until ethanol drove prices up.

Government is the voice of the people, established to make sure the greatest good for the people is done. Nonpoint pollution is not getting better as we can see through the action of farmers already and is getting worse as Iowa's annual rainfall amounts drop as the decades march by. It will also get worse in the future as more countries seek food to feed their citizens, brought on by natural disasters from climate change. Farmers will try to plant even more to meet demands and maximize profits, making the pollution problem worse. It is time to rein in this problem, regulating runoff and enforce codes. No one wants more regulation but when the problem fails to fix itself it becomes necessary. The critique of capitalism is that it does not take into effect the cost to the environment and therefore will never create a corrective for the problem . Voluntary compliance does not work.

Timestamp 1/18/2013 10:20

Name Thomas Jackson
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

conservation of our state soil and water resources has been and always will be of paramount importance on my farm. The amount of rainfall that falls from the sky cannot be controlled but the soil water runoff from my farm can be controled thru careful conservation and best management practices. Practices such as notill planting ,grass waterways, and terrace construction have helped keep soil in place and conserve water on my farm. But these measures cost money and need careful management to be sucessful. A science based and voluntary farmer aproach are the best way to reach the most farms . A broad based and one size fits all approach to soil and water management would be extremly expensesive and costly to the farmers and taxpayers of our great state. I urge you to carefully consider more funding for costshare and voluntary conservation management of our state's soil and and water resources, in my opinion it's the best approach. Thomas Jackson

Timestamp 1/18/2013 10:23

Name Ann Hatfield Merritt
City Creston
State Iowa

Providing comment on the following sections:

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

"The nutrient reduction strategy needs to account for the unchecked growth of hog confinements - a significant nonpoint source of water pollution - or it will ultimately fail in making any

significant progress in reducing nitrates in our water." These hog confinements pollute the air, pollute the water, and cause poverty in our rural communities. The stench is everywhere.

Name John Hall Hall & Associates
City Washington
State District of Columbia

Providing comment on the following sections:

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

HALL & ASSOCIATES
1620 I STREET, N.W.
SUITE 701
WASHINGTON, DC 20006

Telephone: (202) 463-1166 Facsimile: (202) 463-4207

Web site: http://www.hall-associates.com
E-mail: jhall@hall-associates.com

January 18, 2013
Nutrient Reduction Strategy
ANR Program Services
2101 Agronomy Hall
Ames, IA 50011-1010

RE: Comments on Proposed Iowa Nutrient Reduction Strategy
Dear Sir or Madam:
The following comments are submitted on behalf of the City of Council Bluffs and the Des Moines Metropolitan Wastewater Reclamation Authority.

Due to concerns, in particular, over the need to lower nutrient levels contributing to Gulf of Mexico hypoxia and make progress on addressing nutrient levels for in-state waters, DNR, in conjunction with others, developed the above referenced point and non-point nutrient load control strategy. The draft policy is premised on the assumption that Iowa will use a technology-based approach to initially reduce nutrient loadings from most municipal point sources and later adopt site-specific numeric nutrient criteria to protect state waters. Moreover, the ultimate water quality issues regarding impacts of TN and TP will be assessed over time under an "adaptive management" approach.

Federal Regulatory Issues Require Resolution Prior to Strategy Adoption

While our various organizations are supportive of developing an Iowa nutrient load control strategy that results in fairly apportioning responsibility for Gulf related impacts and begins progress on addressing in-state nutrient issues in a cost-effective and sustainable manner, we have a number of serious concerns associated with resolving the federal-state interface for this policy. In particular, the intended results of the state's proposal can only work if they are deemed consistent with and sufficient to meet compliance requirements under the Clean Water Act. The strategy presumes it is appropriate to set technology-based requirements for nutrients, as a federal requirement for pollutants "not regulated" under an applicable effluent guideline (in this case secondary treatment). As discussed below, it is not apparent that this position is correct (federal law regulates "secondary treatment" which does not include nutrient removal) or that EPA will defer any more restrictive requirements it deems necessary at the time of permitting.

The success of the proposed strategy is dependent on its legal sufficiency at the time of permitting. Moreover, the cost-effectiveness of the approach is dependent on (1) control of the nutrient that is actually limiting plant growth and (2) ensuring that facilities not causing or significantly contributing to excessive plant growth in downstream waters are not unduly regulated. However, in the past year, EPA has informed other states and permittees that:

1. Adaptive management is not an acceptable substitute for the immediate imposition of stringent nutrient reduction requirements if downstream waters are considered nutrient impaired. (See, EPA Region I permitting of nutrient requirements for the Great Bay Estuary that rejected "adaptive management," despite admitted uncertainties on the impact of point sources on the system and setting "limits of technology" for TN reduction, even though the municipal impact on algal growth was negligible – final/draft permits and statements of bases for Exeter, Newmarket and Dover, NH may be found on the EPA's website at – http://www.epa.gov/region1/npdes/permits_listing_nh.html).

2. Federal law does not require the adoption of nutrient technology-based limits for municipalities. (See, e.g., EPA's recent response denying the petition for rulemaking from NRDC seeking such action on a federal level which indicated that nutrient reduction requirements must be water quality based - attached). This the state and federal "authority" for imposing case by case technology-based limitations is inapplicable. Such requirements must be based, if at all, on water quality-based authority.

3. States that fail to adopt nutrient criteria must implement nutrient limits at the time of permitting using a state's existing narrative standard; technology-based approaches will not be deemed sufficient to comply with the Act (See, e.g., EPA letters to Colorado, Illinois and actions of EPA Region I in Massachusetts and New Hampshire; EPA response to Congressman Coffman – dated July 24, 2012 - attached)

The recent comments filed by EPA Region VII verify that these are issues that must be addressed to avoid duplicative and wasteful municipal expenditures. For example, EPA has indicated that while the agency "applauds" DNR for engaging in the study as a "great start," EPA recommends that a more restrictive approach be taken to setting technology-based limits, that no schedules of compliance be allowed and that there will be exceptions to the 10 year moratorium if "water quality-based" limits are set. (EPA comments at 3) Following this advice would negate the basic purpose of the DNR strategy and place municipal entities at risk for far more restrictive limitations. More importantly, EPA indicates that the Iowa strategy does not reflect EPA's latest thinking about numeric criteria development and implementation. While it is uncertain precisely what EPA means by this statement, it is certainly possible that EPA will press for statewide criteria to be developed using methods employed in other states (e.g., EPA in Florida).
When a state has not adopted numeric criteria, EPA typically utilizes other approved criteria (including "Gold Book") as the basis for applying a state's narrative standard. We would note that recent EPA actions have proposed or approved stream nutrient criteria in the following ranges:

Colorado: TN ~ 2.1 mg/l; TP~0.11 mg/l

Name John Hall Hall & Associates
City Washington
State District of Columbia

Providing comment on the following sections:

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

Florida: TN~ 1.7-0.7 mg/l; TP~0.46-0.06 mg/l
Wisconsin: TN – not regulated; TP~ 0.07 mg/l

There is little doubt that broad based implementation of such standards in Iowa would put rivers and streams on the impaired waters list for decades to come, given the robust agricultural economy of the state. Such action would have severe economic ramifications for point source contributors because of EPA's insistence that such sources be stringently regulated, even if the point source controls will not produce any demonstrable ecological changes (see, e.g., Great Bay nitrogen limitations). Moreover, at the time of permitting EPA will point to actions approved in other states as an indication of proper narrative criteria interpretation. Id.

Given these well-known EPA positions, already being implemented in other states it is apparent the Iowa nutrient strategy needs to be amended (and expanded) to better conform to the federal program requirements or there will no assurances that radically different (and more restrictive) requirements will not be imposed at the time of permitting or that the ten year moratorium on more restrictive requirements will be respected by EPA. Moreover, based on EPA's comments, it is apparent that a central weakness of the strategy is that it is classifying the approach as a state/federal technology-based limitation, rather than a form of water quality-based limit intended to address, at a minimum, Gulf of Mexico concerns. Finally, since both TN and TP are being regulated pursuant to the draft policy, there will be an expectation that both pollutants need to be regulated to preclude in-state impacts from occurring. EPA's Rivers and Streams Nutrient Criteria development documents noted that such an approach is not a cost-effective way to address nutrient impairments, where they exist. A focus on the limiting nutrient, once identified, is typically sufficient to ensure excessive plant growth does not occur.

The group believes that the following issues need to be addressed to significantly improve the viability of this approach and make it more cost-effective:

• Fair apportionment of Gulf of Mexico point source load reduction responsibilities needs to be identified by DNR and approved by EPA. As point sources, in general, are about 8% of the "problem" (a very minor component), a specific state point source load reduction requirement should be identified so that the technology-based TN reduction goals may be implemented as necessary (and sufficient) to achieve the point source share. Once point source discharges are below this target, the remaining point source share should be considered "de minimus." This should prevent EPA from arbitrarily demanding a greater point source reduction at a later date (as has occurred in other watersheds – e.g., Chesapeake Bay).

• Setting GOM-based load targets and classifying the technology-based limits to water quality-based limits may resolve EPA concern regarding schedules of compliance since such schedules are clearly allowed for new water quality-based limitations.

• The policy should not set specific TN concentration levels to be achieved by all point sources, but, as noted above, set a statewide, point source load reduction target/allocation for Gulf of Mexico purposes, within which a range of limitations are considered. This will allow a point-point trading program and likely avoid construction at many facilities that are less than 3 MGD. This allows for Gulf of Mexico-related TN reductions to be focused on the most cost effective locations and could account for in state load losses prior to TN loads reaching the major tributaries (Des Moines, Mississippi and Missouri).

• Stormwater reductions from municipal and commercial entities should be specifically excluded by this policy. These loadings are extremely minor in comparison to agricultural sources and TN control, in particular, it's difficult and very expensive to obtain in stormwater. The cost per pound removed is expected to be prohibitive and therefore not be a good expenditure of municipal resources. (See attached graphic comparing stormwater cost reductions versus other sources) A single load cap would also allow municipal entities to make appropriate tradeoffs between stormwater versus POTW loads – the latter being far more cost effective to address, should EPA press this issue at a later date.

• For in-state nutrient impact considerations, DNR should specify that only the limiting nutrient will be addressed, which will be presumed to be TP unless information indicates otherwise. This is an approach that has been used by most other states, including Minnesota and Wisconsin. A 1 mg/l "preliminary" water quality-based limit could apply to streams identified as impaired, target absent other information sufficient to generate the final limit to be achieved.

• To address the concern over narrative criteria compliance at the time of permitting, DNR will have to develop some type of guidance to implement the existing narrative criteria at the time of permitting. Such guidance could identify the stressor-response "impairment" thresholds (e.g., chl a levels, secchi depth, minimum DO violations due to excessive algal swings) that will be used for narrative criteria implementation (that will control the application of the federal regulation at the time of permitting). This guidance would also be helpful in identifying waters that are considered nutrient impaired for future TMDL purposes.

Our group, in conjunction with other municipal stakeholders, would look forward to meeting with DNR to discuss how the proposed nutrient reduction strategy may be better tailored to meet federal program requirements and ensure that a cost-effective nutrient reduction program can be implemented in the near future.

Sincerely,
/s/

John C. Hall

Enclosures

cc: Greg Reeder, Council Bluffs
Royce Hammit, Des Moines WRA
Adam Schnieders, DNR

Timestamp 1/18/2013 10:26

Name John Hall Hall & Associates
City Washington
State District of Columbia

Providing comment on the following sections:

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

Attachment

Timestamp 1/18/2013 10:27

Name Larry Happel
City Pella
State Iowa

Providing comment on the following sections:

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

Fertilizer runoff and other sources of water pollution have been recognized for some time. Yet there seems to be little urgency in the Iowa Nutrient Reduction Strategy. It is simply more of the same. Voluntary approaches have been tried for a generation, with only modest impact. There is no reason to believe that new forms of these same strategies will produce more dramatic results. Words like "voluntary" and "pragmatic" can perhaps best be translated as anything that won't cost polluters money. When weighing how much money should be required to implement mandatory aggressive strategies, perhaps one should ask how much money one would be willing to spend to ensure that a family member not develop cancer from a poisoned water supply. Iowans have been blessed with some of the most fertile and valuable resources on the planet. It is already immoral to not conserve the resources God has given us. It should also be illegal. The proposed Nutrient Reduction Strategy falls far short of what this crisis demands.

Thank you for the opportunity to comment and for taking the time to listen!

Timestamp 1/18/2013 10:32

Name michele mckee
City fairfield
State Iowa

Providing comment on the following sections:

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

Water and air are two of our basic elements in life that can't be manufactured or reproduced and will eventually be the basis of cultures which will survive or fade away. China is prime example of not enough water and polluted air and a huge population. Wars will eventually be fought over water. Big Ag and shortsighted thinking that pollution

problems and water shortages and destroyed ecosystems can be fixed "later" are selfish and

misguided. The time to act is NOW and that includes real regulation. Money penalties don't

fix the problem. Already in Fairfield, Ia we all drink bottled water or have RO systems in

our homes and restaurants because of polluted chemical runoffs from years of farmers' chemicals. Now we have CAFO's with more pollution. This is all for money with no thought to

life quality and largely unknown harm done in the future. How about protecting the people, not the profits?

Timestamp 1/18/2013 10:33

Name Stuart C. Schmitz
City Des Moines
State Iowa

Providing comment on the following sections:

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

January 18, 2013

Nutrient Reduction Strategy
ANR Program Services
2101 Agronomy Hall
Ames, Iowa 50011-1010

RE: Iowa Nutrient Reduction Strategy – Comments from the Iowa Department of Public Health

Dear Sirs:

The Iowa Department of Public Health appreciates the opportunity to provide our comments regarding the Iowa Nutrient Reduction Strategy prepared by the Iowa Department of Agriculture and Land Stewardship, the Iowa Department of Natural Resources, and Iowa State University College of Agriculture and Life Sciences. Although the strategy was developed in response to the 2008 Gulf Hypoxia Action Plan, the Iowa Department of Public Health recognizes the important public health implications associated with implementation of the strategy – and, as a result, strongly support further development and implementation of the strategy.

Reducing the nutrient loading to streams, rivers, and lakes in Iowa will have positive health benefits for citizens of Iowa. The following are included in the health benefits of reducing nutrient loading to surface water in Iowa.

• A reduction in nitrogen loading will have positive benefits to both public and private drinking water supplies within Iowa by reducing human exposure to nitrates and nitrites.
• A reduction in nutrient loading is also anticipated to reduce the potential for the development of algal blooms in surface water bodies and the release of toxins from these blooms that can have adverse impacts to human and animal health.
• The methods employed in reducing nutrient loading will also help control sediment runoff into surface water which is anticipated to lower the levels of bacteria within streams and lakes that can cause adverse health impacts.

After a review of the nutrient reduction strategy, the Iowa Department of Public Health wishes to also provide the following comments. These comments have been discussed during several meetings of the Water Resource Coordinating Council, of which the Iowa Department of Public Health is a member, but the department wishes to state to also show our concern.

• One of the greatest needs of the nutrient reduction strategy is the development of the methodology to determine current nutrient loading levels and measurement of any progress in reduction of these levels. Subsequent drafts of the strategy need to address this methodology.
• The nutrient reduction strategy places a heavy burden upon the Water Resources Coordinating Council in the implementation of the recommendations of the strategy, including prioritization of watersheds, and the determination of watershed goals. The Iowa Department of Public Health recognizes with other members of the Water Resources Coordinating Council that these activities need to be taking a priority in the activities of the council. As has been discussed in meetings of the Water Resources Coordinating Council, the Iowa Department of Public Health emphasizes the importance of having broad involvement from the Council members in commenting on the prioritization of watersheds and goals for these priority watersheds.

Thank you for the opportunity to provide these comments.

Sincerely,

Stuart C. Schmitz, M.S., P.E.
Environmental Toxicologist
Environmental Health Division

Timestamp 1/18/2013 10:38

Name Norman Van Zante
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Because this seems very straight-forward, I assume we can count on your support for maintaining a voluntary program. That has worked well in the past, and the last thing farmers need is more federal legislation. We understand the importance of caring for the environment and will do it in a responsible manner supported by the State of Iowa. Your support will be appreciated. Norman Van Zante

Timestamp 1/18/2013 10:38

Name Michael Hejlik
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Please support the IDALS and DNR science based conservation plan. Farmers working with Iowa State University, IDALS, and DNR is the logical approach to implement conservation practices, both proven practices and experimental practices. The state needs to fund cost-share programs and conservation in general, in order to gain positive results and to share those results with all of agriculture. Michael Hejlik

Timestamp 1/18/2013 10:38

Name Kevin M. Griggs
City Boone
State Iowa

Providing comment on the following sections:

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

As chairman of the Boone Soil and Water Conservation District, I offer the following comments regarding the Iowa Nutrient Reduction Strategy.

The efforts to study and understand the problems associated with nutrient pollution in Iowa's waterways is greatly appreciated. There is no doubt that a sincere and genuine effort has been made to solve and reverse the state's water quality issues.

While I find the Iowa Nutrient Reduction Strategy generally informative and accurate, I believe it lacks two vital components that will ultimately affect its success. First is a system of numerical criteria for goal setting and measuring actual pollutant levels. The second is more controversial but absolutely necessary. Iowa must incorporate an enforcement system that effectively holds polluters accountable for their actions. We've long tried a complex incentive-based system of conservation, but with only limited success. Meaningful improvement will require an enforcement effort.

I hope all involved with the Strategy will reconsider these two deficiencies and amend the document accordingly.

Timestamp 1/18/2013 10:41

Name Steven Pierce
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I was reading about the voluntary nutrient reduction strategy and am greatly in favor of it. I believe that funding would be very well spent on this and other conservation programs rather than mandates. A blanket set of mandates are never a good idea because every farm and situation is different. A farm that has a creek running through it would have a greatly different strategy than one that is 6 miles from the nearest stream.

The thought of government mandates scare me because this could mean that officials who don't know the factors that affect each piece of land, such as soil type, ground slope, and many others. Using scientific reasearch and smart practices this problem will be well on its way to being solved. Funding these beneficial programs is definitely the way to go rather than through government mandates. Steven Pierce

Timestamp 1/18/2013 10:53

Name Bob Wells
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

This response is in support of a voluntary, sensible, science based nutrient reduction strategy for Iowa. This type of strategy will allow Iowa s producers to respond on a farm by farm basis and implement those conservation practices best suited to meet the overall objective of a particular farm and contribute to the programs overall success.

Most Iowa producers follow good conservation practices and enhance the value of their farm land by implementing and participating in programs that have the overall goal of reducing soil and nutrient runoff into our streams and rivers. As producers make these individual commitments to reducing soil erosion and nutrient run off, it should become a priority of Iowa citizens and their elected representatives, to fully fund those cost share practices that contribute to the overall good of the state.

All Iowa citizens will benefit through better funding of these programs, especially when a program benefit could be a reduction in municipal and rural water treatment cost. Bob Wells

Timestamp 1/18/2013 10:55

Name Tom Oswald
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Considering the importance to all Iowans that we maintain both economically and environmentally sustainable agriculture, I urge you to fund and support the Nutrient Reduction Strategy.

No doubt, pro-actively dealing with the issue of nutrient management in state is better than heavy regulation from Washington D.C. Tom Oswald

Timestamp 1/18/2013 10:58

Name Jerry Anderson
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am asking for your support of a science based nutrient reduction strategy that is also based on voluntary participation.

I have the best vantage point to determine which additional conservation practices that will work in my operation. My main focus is keeping soil in my field. Keeping soil and the nutrients attached where it belongs is the key to improved water quality. My goal for soil loss has been and will remain zero. With the continued use of rational grazing, maintenance of waterways and proper placement of filter strips I will get closer to this goal.

Farmers across this state share my views and will implement additional practices as they fully understand retention of one their most valuable assets- soil is critical. A Nutrient Reduction Strategy that is adequately funded along with improved funding of conservation cost share dollars will greatly help with water quality improvement through additional conservation projects. Matching a tax payer dollar with that of a farmer would be wise investment for our citizens, environment and our world.

I am asking for your continued support on this important matter and I appreciate your efforts for those individuals you represent.

Sincerely,

Jerry Anderson

. Jerry Anderson

Timestamp 1/18/2013 10:58

Name Angie Carter
City Ames
State Iowa

Providing comment on the following sections:

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

At the public information meeting on Dec 19th in Ames, IA, Gipp encouraged Iowans to all do more and acknowledge that we each share responsibility for Iowa's water. While this is true--we each could do more to conserve and improve water quality, and it is a responsibility of every citizen--there is a gross power imbalance in our state's approach to improving Iowa s impaired waterways. The most nutrient loading, or let s call it what it is pollution, to our water comes from agricultural practices that encourage erosion and run-off on our farmland.

Our water quality will not improve without the state of Iowa taking responsibility for meaningful and measurable conservation practices. Iowans do not all share an equal burden or responsibility for improving water quality. This must be facilitated by increased state funding to support cost-share programs and their administration, as well as a strategic outreach plan that uses the best social science research. In addition, voluntary compliance must be abandoned as our fallback approach to environmental improvements. This has not worked, not ever, and surely won t work with limited funding, staff, and lack of social science. We need people on the ground to work with landowners and farmers in addition to people in policy to create changes that not only encourage, but require conservation.

This plan lacks the needed science, funding, and approach to consider clean water as a public good, something all Iowans should be able to access and expect from our state. This plan seems to expect farmers themselves, as individuals, to engage in needed changes in order to improve water quality in IA for all. This is an undue burden and a failure of our state to assume its role in ensuring clean water for all. That the state has failed to create policies to foster water quality improvements, or to fund needed programs and staff to engage in research, outreach, compliance, and regulation of our water, shows gross neglect.

One of the strategy s contributors stated at the Dec 19 public meeting in Ames that a cultural shift is needed to successfully engage Iowans in adopting the needed water quality improvements and conservation practices. We agree that such a cultural shift is paramount to change. However, the proposed strategy lacks the means for such a culture of conservation to take root. The strategy, as currently outlined, includes hypothetical adoption rates of conservation practices through voluntary compliance, yet the research team lacks adequate input from the field of social science and farmers themselves that would validate these scenarios.

The plan mentions a suite of practices that somehow farmers are expected to adopt. Magic? Divine intervention? Social science would be an appropriate tool for creating recommendations for needed behavioral changes in agricultural practices, yet this plan lacks any mention of social science. In fact, there is one economist on the research team but no other social scientists. In a state where there are key agency, university, and non-profit stakeholders engaging in active changes on the ground on a watershed scale, why was this knowledge not applied to this plan? For example, citizen stakeholder groups and the IDNR are engaging in watershed scale conservation in the Cedar-Iowa River Valleys. Might this work not be a model for change? These voices are absent from this plan. If this plan is meant to be a means for our state to make big, landscape scale changes, we need social scientists and the examples of real-life scenarios working in our state. What lessons have been learned from these and how can they be applied? Use of this current participatory conservation research would offer real-life examples of what the nutrient strategy plan lacks a diversity of voices and perspectives including farmers participating in field trials and voluntary conservation, non-profits developing extensive networks of public-private collaboration to address environmental concerns, and diverse stakeholders engaging in targeted projects creating watershed scale-improvements.

Still, it is not enough to rely on farmers and limited conservation agency staff to ensure water quality improvements. If it were, then these changes would have already taken place. It s not for want of information or money that farmers are not making needed conservation changes. Many of the large-scale farmers have money enough this year to make improvements and most farmers are already associated with networks and organizations that share conservation information. The state must fund both conservation practices and increased natural resource management staff to ensure adoption and compliance. This increased funding from the state will support Iowa in realistically achieving meaningful non-point source pollution reduction, despite current agricultural practices driven by high crop prices.

Further, the strategy calls for additional agricultural conservation outreach and resources, but an awareness campaign is not enough to change the economic realities faced by farmers. Wetlands are mentioned as a specific practice to help us reach our water quality goals, yet the CREP wetlands team is very small and lacks the staff capacity and funding to engage the needed acres in what would make impactful changes. Other wetlands are not popular in IA in fact, with the current corn prices, farmers are draining and taking acres out of federal farm programs at an increasing rate to compete with the markets. The state seems out of touch with the reality of our current farming practices.

Finally, the strategy assumes that there is a way to do even more with currently limited financial resources allocated to support conservation. At the rate that confinements are being proposed and built, and that conservation acres are being removed from federal farm programs, how are 11 or 13 more staff supposed to be enough to create the needed materials and outreach, much less engage in the relationship building and networking needed for landscape level changes, or the regulation and compliance work that is needed to ensure the changes are maintained?

Timestamp 1/18/2013 10:58

Name Angie Carter
City Ames
State Iowa

Providing comment on the following sections:

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

Timestamp 1/18/2013 11:02

Name Todd Ontl
City Ames
State Iowa

Providing comment on the following sections:

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

The Iowa Nutrient Reduction Strategy aims to reduce nutrient inputs to the Gulf of Mexico by 45%. As the report states, the vast majority of these nutrients in flowing into Iowa's water come from agricultural (non-point) sources, whereas only a minor portion come from point sources such as municipal wastewater treatment plants (8% of nitrogen, 20% of phosphorus). As such, it stands to reason that any strategy that aims to effectively reduce nutrient inputs to Iowa's surface waters need to focus on new and aggressive approaches that lead to measurable reductions in non-point contributions to nutrient pollution. This approach necessitates solid goals in nutrient levels in order for improvements to water quality to be sustained over the long term.

The strategy summarizes research conducted at Iowa State University that shows the effectiveness of conservation practices currently in use by many of Iowa's farmers in reducing nutrient contributions to local lakes and streams. These conservation practices are relatively simple and effective, an important consideration for implementing broadly across Iowa's extensive agricultural lands with limited state budgets. However, in order to have significant reductions in nutrient concentrations in our waters, many more farmers would to implement these practices across much greater proportions of our state's agricultural landscapes.

Simply stated, the path forward to an effective nutrient reduction strategy for the state hinges on the widespread adoption of conservation practices by Iowa's farmers. The current plan fails to present any meaningful approach to doing so. The strategy presented represents a continuation of the current voluntary implementation approach, an approach which has been unsuccessful in improving the state's water quality and reducing our contributions to the problem of Gulf of Mexico hypoxia. Furthermore, the strategy does not set any goals for water quality improvements to even achieve. Solid limits for nitrogen and phosphorus concentrations in Iowa's surface waters must be determined in order to provide metrics for achieving nutrient reduction that are meaningful and can be sustained. In order to achieve the goals of improving water quality, we need to go beyond crossing our fingers and hoping farmers "do the right thing" for our lands and waters. The document does not outline any actionable plan for widespread adoption of conservation practices. At a minimum, we need to provide funding to state programs that help farmers to implement these practices, and staff the agencies and programs that ensure compliance if state or federal funds are to be use in cost-share approaches. In order for a plan to have substantive impacts on water quality, it should provide:

- support for programs identifying high-potential source areas for nutrient run-off for targeting conservation practices
- tax credits for landowners who are exceptional stewards of the land
- support for practices such as cover crops and extended crop rotations that reduce fertilizer inputs
- required minimum-width riparian buffers along all waterways
- full funding of all existing water quality programs (Iowa Water and Legecy Fund, REAP)
- additional programs to fund wetland restoration and construction for nutrient removal

In order to be successful, a nutrient reduction plan must have at minimum two components: 1) meaningful targets for water quality improvements, and 2) an actual strategy for enabling Iowa's farmers to adopt the conservation practices we already know are effective for solving the problem.

Sincerely,
Todd A Ontl
Ames, IA

Timestamp 1/18/2013 11:11

Name Jon Mcclure
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 today in regards to the Nutrient Reduction Strategy. I believe that a science-based state nutrient reduction strategy that recognizes voluntary conservation practices and need to maintain agricultural production will be the best fit for your state.

I would urge you to adequately fund this strategy as well as the other conservation cost-share programs. Failure to fund these programs have delayed projects in the past and will delay needed conservation projects in the future.

We as farmers know what projects work on our farms. A voluntary based approach is the best way to encourage conservation practices and improvements to our land to provide the greatest benefit for our water quality in the state. Jon Mcclure

Timestamp 1/18/2013 11:11

Name Chuck Walters
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am writing in support of the Iowa Nutrient Reduction Strategy. The strategy is based on science and technology that is sound for my land and my business. It will enable us to use the conservation practices best adapted for my farming operation and the land.

There is not a "one size fits all" conservation program that can work for prairie potholes, timber soils, high production soils in Grundy county, hills of southern Iowan, or for river bottom grounds that make up the Iowa landscape. Farmers know and understand this; we want to save our soils, improve water quality, and improve the overall environment while making a living off the land. We use the research provided from the scientists in this state and support the programs that help farmers incorporate the conservation practices that work for our state. This research is what the Strategy is based on. By funding the Iowa Nutrient Reduction Strategy and other conservation practices, farmers will continue to VOLUNTARILY adapt sound conservation practices, without have to create regulations to FORCE people to do the same practices.

As a farmer and a landowner, I care about Iowa's land and environment. It is not only where I am raising my children; it is a great part of the legacy that I can leave to my children. Not only do I want the best for my children, I want to only to do the best for the land that I have as well. Programs like the strategy will allow me to continue to save the soil while improving the water quality throughout the state. That is why I feel that supporting the Strategy is the right step for Iowa. Chuck Walters

Timestamp 1/18/2013 11:11

Name Catherine Scott
City Ames
State Iowa

Providing comment on the following sections:

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

Transparency is important in the implementation of the strategy and the sharing of data.

I would suggest cooperation on a watershed basis to reduce nutrients. Everyone taking small steps together in an environment of cooperation could have a large impact. One idea is to have a competition among watersheds to see which one can make the biggest reduction. This idea was used in communities in Kansas to reduce electric consumption. Alliances between recreational water users and farmers could be helpful.

Quantitative data is a must. Current levels and any reduction by methods tried needs to be shared. A computer program could be developed to enter and evaluate data. Monitoring equipment should be made available. If certified crop advisers play a big role then give them more training and tools to make changes easier to do for farmers.

Market solutions were mentioned but I did not hear a good example of one. Would cost benefit ratios for different strategies be one?

Look for a large producer/owner for a demonstration project. Awards and recognition for nutrient reduction is a good idea.

If cover crops are removed by Roundup I am not in favor of that. If cover crops do not involve chemical spraying I think they have a lot of potential.

There needs to be a time limit on voluntary compliance. With good records and quantitative measures progress can be documented. If progress is nonexistent or too slow then compliance should be made mandatory.

I am concerned that so much money will need to be spent on point source reduction when that is a smaller part of the problem.

Timestamp 1/18/2013 11:15

Name Robert Carmichael
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Please fully fund the Iowa Nutrient Reduction Strategy.

The first in the nation strategy was developed by IDALS, IDNR and ISU in a scientific, reasonable and cost-effective manner. Under the plan, IDALS and IDNR will have specific areas of responsibility to reach ambitious nutrient reduction targets. This plan will help clean our water and reduce excess nutrients reaching the Gulf of Mexico.

The EPA has commended these agencies on their work and the science-based design. They belive this plan will yield measurable nutrient pollution reductions. Robert Carmichael

Timestamp 1/18/2013 11:16

Name Stephanie Dykshorn
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

As your constituents, I ask that you support measures to fund conservation cost-share programs, particularly the Iowa Nutrient Reduction Strategy. These programs directly affect many of the people you represent and many of us voluntarily implement conservation practices already. Please adequately fund INRS as it is science based and recognizes the practices we already, voluntarily do. Stephanie Dykshorn

Timestamp 1/18/2013 11:24

Name Richard Dietz
City Ames
State Iowa

Providing comment on the following sections:

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

I feel that this strategy falls short of what is needed to address major contributors to Iowa's poor water quality. This strategy fails to set specific goals for nutrient reduction, and timetables to achieve those goals. It fails to state how those who would choose not to participate would be held accountable.

If we're to achieve meaningful and measurable progress we cannot continue to rely on the voluntary adoption of practices that are known to reduce the pollution of our rivers and streams. If we expect to achieve the state goal of 45 % reduction there will need to be a high adoption rate of many different Nitrogen and Phosphorous reduction practices. There will need to be measurable goals, and tracking of progress towards those goals. Iowa will need to get serious and fund the conservation programs that are already in place, while considering the costs of doing nothing - and the benefits of measurable improvements. This will not happen, and has not happened, with voluntary compliance.

There does not have to be a "one size fits all" plan. We have the knowledge and technology to address the problem on all types of soils and landscapes - the sort of information that is contained in this assessment.

When the Clean Water Act became law, point sources were said to be contributing 85% of the pollution to our waters. Today nonpoint sources are considered to be contributing 85%. This change came about because of the implementation of standards, regulations and deadlines. It's time that farmers join other businesses, industries, and municipalities in helping to meet our water quality goals.

Timestamp 1/18/2013 11:26

Name David Rock
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 voice my support for the Iowa Nutrient Reduction Strategy . I believe that this is a reasonable approach to an issue that affects all Iowans. I like that is voluntary as no two situations are the same. Solutions that work in one part of the state might not be practical in another. The voluntary part will allow us to implement practices that will work best on our individual farms. It is important that any plan we adopt be based on science and not on emotion.

Our farming operation is located in North Central Iowa and we do not have any rivers flowing through our property. All of the drainage ditches that run through our farms are back sloped away from the ditch; therefore we are not as concerned with water erosion as we are with wind erosion. To help stop this we have used reduced tillage for many years. We are constantly looking for practices that fit our operation that will allow us to reduce tillage even more.

I will conclude by urging you to adequately fund the Iowa nutrient Reduction Strategy plan and also to increase funding to close the remainder of the Ag drainage wells in North Central Iowa. David Rock

Timestamp 1/18/2013 11:33

Name Reagan Osborne
City Jefferson
State

Providing comment on the following sections:

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

The nutrient reduction strategy needs to account for the unchecked growth of hog confinements - a significant nonpoint source of water pollution - or it will ultimately fail in making any significant progress in reducing nitrates in our water.

Timestamp 1/18/2013 11:40

Name Howard Anderson
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Please support and adequately fund the Iowa Nutrient Reduction Strategy as well as the state's conservation cost-share programs. If we are going to continue producing high quality, high demand products such as corn, beans, and cattle, we need to take care of the God given land. State cost share money assists landowners in accomplishing more conservation practices with their same input. It lessens the burden of the landowner with a benefit of all Iowans.

On our family farm, I have implemented thousands of dollars worth of terraces conserving our ground. I utilized the cost share programs offered through the State allowing me to completely terrace the farm. I have a few projects in mind that need to be done and hope there will be cost share money in the future to ensure that I will be able to accomplish them fully and completely within in my budget.

Again, I ask that you adequately fund the Iowa Nutrient Reduction Strategy and the state's conservation cost-share programs to ensure timely completion of conservation practices. Howard Anderson

Timestamp 1/18/2013 11:41

Name Veronica Lack
City Iowa City
State Iowa

Providing comment on the following sections:

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

By allowing Mitchell County Iowa's Point Source pollution to continue for some farmers others in Mitchell County had high animal loss numbers and the farmers and families downstream had to suffer the health effects and loss of life. This channeling of the huge swale area of and around Section 10 Cedar (W) Township to outlet directly down sinkholes is a travesty that continues to affect lives downstream. It also encourages the other unsustainable farmers to do the same when they see the new equipment and shops and houses the polluters are building and the Big Corn dollars fund the polluters purchase these pasture/wetland with no legal drainage outlet parcels. So now this is not the only on-going plume. But this plume is documented and is draining down through Floyd, Butler, and Bremer County. More wells are now affected in Mitchell County as in 2012 I received well test results on wells that were drilled at the IDNR suggestion in 2004 and they had to be drilled again to deeper aquifers after the 2008 floods.

Anhydrous Ammonia fertilizer is contaminating deeper and deeper aquifers in this one known and documented plume.

In February of 2007 I filed a Discrimination Charge #08-1022 on Farm Program Benefits against the USDA-NRCS for Mitchell County's NRCS's part in planning the illegal flood channels through lines of sinkholes and then illegally digging through my farm to dump down a line of sinkholes in a National Wetland. This ditching to sinkholes initially polluted the Upper 100 foot or so of the Cedar Valley Group Aquifers and all the wells using it downstream from Bradley Johnson's ditches to the sinkhole north of his and his dad's farmstead.

The IDNR took the side of the polluters in 1993 when I complained and withheld my well tests from me and is still surpressing the knowledge of this on-going pollution plume. Our government agencies decided to pay for the polluters to get new wells under the Program to Prevent High Animal Loss Numbers from Nitrate Contaminated Wells in 1993 they paid for Bradley Johnmson to get a new safe well. However we downstream were not were not even given our well test reports. The DNR's Dale Adam's and Mitchell County Sanitarian continued to test my well and the others downstream as I was still concerned about all the runoff being directed by more shaped waterways to those sinkholes.

Most of that karsted aquifer recharge area south of Saint Ansgar that Robert Libra wrote about years ago is now drianed down sinkholes or tiled in such a way it doesn't drain or outlet above ground. As tile needs slope to drain and that area has very limited soil depths sustainable farmers could not tile, but unsustainable farmers do and have even dug through the karsted bedrock to lay tile.

We need restrictions on Anhydrous Ammonia fertilizer application even more than the other biological fertilizer as this manmade fertilizer when its introduced by Point Scource channeling or tile outleting directly into our drinking water it doesn't die off in the cold and dark like biological fertilizer tends to do in our aquifers. Instead it builds up and even drops to deeper aquifers as the well tests have proven. We only have limited ground water and presently it is not being replaced by 1/2 inch amost weekly rains. When aquifers recharge now its with less frequent but larger rains. This particular contaminated plume broke through into the next deeper aquifer after the 2 - 2008 floods. When waterways and ditches are dug directing water to these sinkhole drains the force of this speeded up water hit the floor of our aquifer and broke it through to the next lower aquifer.

We are not enforcing our drainage laws in Iowa, as proved by the suit the IDNR said I had to file in 2005, after the polluters had gotten the IDNR to charge me with BLOCKAGE OF WATER in 2004. After I had filed that civil suit the group of farmers with no legal drainage outlet ripped out a 1/4 mile of my north 80 fence and brought heavy equipment in and dug away 42 acres of my farm to channel over roads to drain their over 2200 acres down into a National Wetland with six big sinkholes. They got surveys done for their Proposed Ditch surveys done by NRCS employees without ever asking permission and just trespassing on my farm. Unfortunitely my health issues from our contaminated well (after my husband died in 1/2004 from the effects) took me to the Mayo Clinic for frequent care or apponitments. In court in 2007 one of the bulldozer operators Mark Wagner who had trespassed said when asked if he had done a survey or asked permission of me to do the work he had done on my farm, he said, "No, she's a woman and doesn't know anything."

Later in 2010 I filed a Discrimination Charge CP # 07-10-59302 against the State of Iowa/Department of Natural Resources to try to get the Iowa DNR to effectively notify other well owners in the known on-going plume of contamination and accurately warn them and I also was asking for the Anti-Degradation laws, part of the Clean Water Act to be enforced and this particular plume stopped.

Point Source pollution is Profitable for the few in this Mitchell County Cedar (W) Township but it cut the property I owned in half and two of my family are dead because of it, being downstream from this on-going pollution plume killed my dreams of a happy farm life.

My renters downstream in Bremer County, who care for foster children have their well tested for the safety of those children and found their well tests positive for ammonia nitrogen as (N) this test result when added to their Nitrate test result totals over 15 and Des Moines's well tests total are below 10 as the EPA says below 10 is drinkable but Des Moines Iowa had to install multi-million dollar nitrate scrubbers to get the test

Name Veronica Lack
City Iowa City
State Iowa

Providing comment on the following sections:

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

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results below 10.

We need mandatory and strict enforcement of the Clean Water Act by the IDNR, it is their job, why aren't they doing it against the farmers that have now polluted the water downstream in Iowa City, Iowa, my drinking water in Iowa City now tests positive for anhydrous ammonia fertilizer or Ammonia Nitrogen as (N).

We need to stop dumping Anhydrous Ammonia down sinkholes and tile drains into our drinking water. It is not cheaply or easily removed from our drinking water and is building up since more people pollute after seeing others make so much money that it causes them to look the other way when animals and people die downstream.

Timestamp 1/18/2013 11:42

Name Kyler Oswald
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I believe that it is very important for something to start being done to address the issue we have with water contamination. At this point it is not completely out of hand and we need to start addressing it now before it gets to the point where it is out of reach. That being said keeping the involvement in this fight against the nutrient contamination voluntary rather than mandatory is also very important. Farmers are naturally conservationist and will want to keep the ground and water healthy so to speak. That being said there needs to be proven ways to do so. So the more ISU provides scientific research supporting these practices and the more farmers interact and test these practices the better this program will be for not only the farmers but also the ground/water. I think that good point to start is to somehow get farmers to put more buffer strips back in. Along waterways and elsewhere in the fields where high erosion occurs, so many of these waterways and buffer strips have been taken out in recent years due to the high dollar crops. It s more economical for them to farm the ground. But it might be doing more harm than good. Bottom line when it comes to my opinion, something needs to be done and the nutrient reduction strategy is a great start but it needs to stay voluntary. Kyler Oswald

Timestamp 1/18/2013 11:42

Name Tom Frantzen
City New Hampton Iowa
State Iowa

Providing comment on the following sections:

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

Farmers would like to have the public trust when it comes to being good stewards of the environment but both the history of agriculture and what is going on at the present do not support this trust. If farmers are the original environmentalists please explain the Dust Bowl a catastrophy caused entirely by agriculture and greed. If the public wishes to see if todays farmers are doing a good job of being land stewards all they have to do is to take a trip across Iowa, especially on rural roads. Huge hog operations in Northeast Iowa are activily destroying wetlands, bulldozing woodlands and converting permament pasture lands to intensive cropping. And they are doing this right to the edge of the streams. I have farmed in this same place for 40 years and I have never seen such a relentless assault on the environment. Voluntary guidelines are a joke. What matters in the world of huge corporate farms is obliterating anything in the road of their huge planters. Their destruction of fragile wetlands and woods will result in the worst soil erosion you can imagine and that disaster is coming. From where I stand and what I see as I drive across rural Iowa greedy farmers are doing anything for short term gain. This is no different than in the past and history will be repeated.

Timestamp 1/18/2013 11:48

Name Andrew Hill
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 to ask you to support the proposed Nutrient Reduction Strategy.

Iowa has a great wealth of soil and climate that allow us to be extremely important and the production of the world's food, fiber, and energy. Many different methods of farming have been used throughout Iowa's history. We have learned over time that different practices need to be used depending on soil type and slope, location north or south, and what is raised on the land. We have developed a host of practices that can be viewed as tools in a toolbox. These tools can be implimented any many combinations to achieve many desired goals such as productivity, profitability, and stewardship.

The strategy that has been proposed to help in reducing Iowa's share in the nutrient load in the Mississippi has many well thought out features. These include the science based options that can be used on our land. These additional tools for our toolbox can be used where apporpiate. This strategy also allows new tools to be added as new ones are developed.

Please look at the methodology used in developing this Nutrient Reduction Strategy. I believe that you will find that its broad, science based practices can offer great opportunities when applied independantly to the diverse geography of Iowa.

Please support the proposed Nutrient Reduction Strategy. Andrew Hill

Timestamp 1/18/2013 11:51

Name Travis Cox
City Fairfield
State Iowa

Providing comment on the following sections:

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

I read the Executive Summary.

Please just do *something significant* to improve Iowa's waterways.

As a sustainability professor, an avid canoer, and a father, I know that something has to be done.

This seems like a first step. Take it!

And please don't let Agribusiness water this down (if you will forgive the pun).

Timestamp 1/18/2013 12:03

Name Barbara Dickins
City Fairfield
State Iowa

Providing comment on the following sections:

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

I have just read Jack Engstrom's informed opinion of the conservation practices that have brought us to a time of degradation of natural resources. I hope that someone will listen to his wisdom and put in place a plan to rectify the currently dangerous conditions.

Timestamp 1/18/2013 12:05

Name Roger L. White
City Cedar Falls
State Iowa

Providing comment on the following sections:

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

The most repeated phrase in the explanation and in the policy is that it a "science and technology-based framework" to address the nutrient pollution of Iowa's lakes, streams and rivers. In itself, it is commendable that the Strategy is based on science and technology. However, the result still spells failure for Iowa and Iowans. That means failure to attain the overall motivating goal--reduction of the dead zone in the Gulf of Mexico.

Iowans have known for many years that we have a huge number of impaired bodies of water and the number and severity are increasing and not decreasing. Since that is not new knowledge, it is apparent that "voluntary action" by the state and its polluters has not and will not fix the problem now. More drastic action is required.

The Strategy fails to list goals for improvements either short or long-term. Without goals or benchmarks, it will not be possible to judge progress toward achieving the goals. Every educator understands that.

The Strategy relies on direct requirements on "point source" polluters like city waste water systems or industries, however for the largest contributors to the nitrogen and phosphorus pollution, there are only voluntary "suggestions." As noted above, voluntary actions have not resulted in improvements in the past and there is nothing in the Strategy to give one confidence that doing the same thing over again will yield a different result.

While the Strategy references conservation research, there is no direct connection in the document as to how the research will be applied to improve soil and water conservation and reduce nutrient pollution from "non-point" (agricultural) sources. Apparently, research results will add to the "suggestions" available to voluntarily approach the problem. This relates directly to the lack of goals or benchmarks and voluntary action noted above.

The Governor and several legislators continually talk about greater accountability for teachers and schools, but the accountability in this Strategy is lacking or invisible. Without accountability measures for the state agencies and for the individual sources of nutrient pollution, success will be accidental (if it occurs). More likely, the citizens of Iowa as well as those all the length of the Mississippi River will be subjected for the foreseeable future to continual nutrient pollution of our most essential and precious resource--clean water. And the dead zone in the Gulf of Mexico will continue to be a nasty and embarrassing legacy.

The state should immediately revise the draft Strategy to include the missing elements. Absent that, the US Environmental Protection Agency (EPA) should reject the proposed Strategy and return it for improvements. Finally, if the state and the EPA adopt this weak, watered-down Strategy, state and constituent organizational leaders who endorse it must explain how this will be different, and then they must be held accountable when this approach fails to clean up the pollution in our water.

Timestamp 1/18/2013 12:15

Name Brian Borcherding
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am asking for your support of the nutrient strategy for Iowa. The impact has been seen in other states that have such plans implemented already. If not implemented properly, growers could see negative impact on production costs and several other variables. There needs to be a conprehensive plan implemented that would include research into areas such as soil types and their cation exchange capacities so that a "one size fits all" plan does not get implemented. Brian Borcherding

Timestamp 1/18/2013 12:22

Name Aaron Schroeder
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

let the farmers prove to you they can get it done ob their own. wHAT can be accomplished by asking nicely will amaze you! Aaron Schroeder

Timestamp 1/18/2013 12:24

Name Tom Wind
City Jamaica
State Iowa

Providing comment on the following sections:

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

I applaud the evaluation, study and proposals by IDALS, IDNR and ISU on this important environmental issue. As a farm landowner in Iowa, it is important to me to pass my farm on to the next generation in better shape than what my parents left for me. Because of this goal, I incorporate CRP, buffer strips, many waterways and my tenant uses no till operations. I have done the relatively easy things and there is not much more that I can do without making significant investments, increasing my operating costs and ultimately reducing my profits. Herein lays the problem with the voluntary strategy proposed by the Nutrient Reduction Strategy: why would any farmer or landowner voluntarily do these things if they increased their costs and reduced their income, especially if they were in a competitive cash rent situation? If they did, they would be at a competitive disadvantage. To be fair, everyone needs to be forced to use the nutrient reduction strategies developed for their watershed.

Most of us farm landowners are now millionaires and are now in better financial shape to make these investments than we have ever been. We should not be expecting ordinary tax payers to pay for the improvements for addressing this nutrient pollution problem.

I am 61 years old. Unfortunately I doubt that I will live long enough to see the day that this voluntary strategy will make a significant difference in our streams, rivers, lakes and the Gulf. The proposed strategies must be mandated to make any significant progress in nutrient pollution reduction.

Thank you for the opportunity to submit comments.

Tom Wind

515-386-3405

Timestamp 1/18/2013 12:26

Name brian galloway
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 would urge state lawmakers to adequately fund the Iowa nutrient reduction strategy, as well as the state's other conservation cost share programs. Iowas failure to adequately fund these programs in the past has delayed needed conservation projects.

Many of the conservation practices we have implemented include waterways , buffer strips, terraces and tiling. Through the natural filtration of the soil we believe these are best practices for our farm and the surrounding environment. brian galloway

Timestamp 1/18/2013 12:26

Name Tim Schulte
City
State Iowa

Providing comment on the following sections:

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

Lots of good ideas have been around and promoted for a long time.

While there might be some practices that, with a little promotion, might catch on voluntarily, relying on volunteer participation is basically making all this research and hard work more difficult if not entirely moot.

While current abusive practices may have evolved out of innocent tradition, it is embarassing that for so long now we have knowingly allowed Iowans and Iowa based business to continue to contaminate our neighbors and life downstream. It's morally reprehensible to allow this to go on.

While best practices should be promoted, at the same time state wide, or ideally watershed-wide, regulation should be crafted so that watershed quality is protected from the temptation of more profitable short-term malpractices.

Most regulations should be watershed wide, stiff penalties should be set in place to deter deviants, enforcement should be funded and vigorous.

It is not ethical to continue polluting our long-neglected downstream neighbors, and it's not fair to those Iowans who strive to be good business stewards to let unregulated market forces compell them to act contrary to best practices.

Relying on voluntary participation is a dangerous and immoral continuation of policy inaction.

I wish I had an easier suggestion, but that would have been implemented long ago.

Thanks for you time and effort

Timestamp 1/18/2013 12:30

Name Jeff Tindle
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Thank you for supporting agriculture!

I am writing you today to ask you to please support a science-based state nutrient reduction strategy. We have a chance to lead the nation in voluntary nutrient reduction with secretary Northey's plan.

A vital piece of that plan is to employ necessary conservation practices. Many of these projects are ready to be completed they are just waiting on cost share funding.

Please support Secretary Northey's plan and fund conservation cost share programs.

Thank you! Jeff Tindle

Timestamp 1/18/2013 12:30

Name Mike Fortin
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Please help Iowa protect our lands by funding the nutrient reduction strategy and other conservation cost share programs. Mike Fortin

Timestamp 1/18/2013 12:36

Name Harry Ahrenholtz
City Jefferson
State Iowa

Providing comment on the following sections:

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

Agriculture's Clean Water Alliance (ACWA) supports the nutrient management strategy that has been proposed for adoption in Iowa. Since its formation, our organization has been actively monitoring the waters of the Racoon and Des Moines River watersheds on a voluntary basis for over 12 years. The knowledge gained from our initial monitoring work led to a variety of pilot initiatives and demonstration projects aimed at improving water quality. ACWA members have invested nearly $2 million in this pursuit since its formation. There have been measurable successes. Key conclusions from this effort have proven that there is no one size fits all solution and that informed producers want to adopt those practices that can impact improved water quality. We believe a science based approach for producers to implement the most effective practices specific to their farms can be the most powerful resource to achieve water quality improvement on a broad scale.

Harry Ahrenholtz, President

Timestamp 1/18/2013 12:37

Name Steve Sandbothe
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I would lilke to ask that you fund the Iowa Nutrient Reduction Strategy as well as the state's other conservation cost share programs.

Living near the Mississippi I understand the need, and the desire by producers to do what is right and this strategy is ideal. Steve Sandbothe

Timestamp 1/18/2013 12:39

Name Mendy Stender
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I feel that the state of Iowa needs to have a better science-based state nutrient reduction strategy program. The voluntary conservation practices and maintaining agricultural production are very important for the farmers to have.
I feel the state needs to be doing a better job at funding the state Nutrient Reduction strategy and other conservation cost-share programs. In the past the state has not adequately funded these programs, which has hurt and delayed our conservation programs. The state need to get the conservation practices back on schedule to help the farmers with their farm grounds. So we can keep the crops growing yearly to support our family's. Mendy Stender

Name Thomas A. Evans
City Granville
State Ohio

Providing comment on the following sections:

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

January 18, 2013

Mr. Chuck Gipp

Director, Iowa Department of Natural Resources

Wallace State Office Building

502 East 9th Street

Des Moines, Iowa 50319

Mr. Bill Northey

Secretary Iowa Department of Agriculture and Land Stewardship

Wallace State Office Building

502 East 9th Street

Des Moines, Iowa 50319

Dear Mr. Gipp and Mr. Northey:

Thank you for the opportunity to comment on the draft Iowa Nutrient Reduction Strategy released on November 19, 2012, made possible by the extension of the comment period from January 4th to January 18th. I am also grateful for the opportunity to view a December 21st public meeting webinar, available because of a poorly timed snowstorm. Besides the webinar I have reviewed documents related to my greatest concerns about the Strategy: Executive Summary and Section 1: Policy Considerations and Strategy and Section 2: Nonpoint Source Nutrient Reduction Science Assessment.

I am a former chemistry professor, retired after a 40-year career of teaching and research at a liberal arts college in central Ohio. I grew up in Iowa, living in various communities in the state Clinton, Knoxville, Cedar Falls, Spencer, Mason City and Des Moines and graduated from Grinnell College. My love for the state was encouraged by my father s commitments to his hometown, Linn Grove, IA and his knowledge of the state, developed from his perspective as an economic forecaster for what was then the Northwestern Bell Telephone Company. Although I have an appointment as a Visiting Scholar at the Ohio State University, I have devoted significant time since retirement to a variety of environmental and sustainable agricultural issues, activities that have included a number of visits to Iowa, including attending a Mississippi River Basin Commission meeting held in Des Moines a few years ago. I have met a number of wonderful people in and out of Iowa state government with strong and effective commitments to Iowa s environment and a sustainable future for its agriculture. One of my expectations of the draft Strategy was that these individuals, and others like them, deeply committed to improving the quality of Iowa s streams, rivers and lakes, would be inspired by the strategies set forth. The document fails this test, which is why I am taking the time to comment. Much of the detail in the strategy policy discussion seems to be designed to describe non-point source issues as impossibly complex. There is not enough detail or evidence of real commitment to support claims of aspiring to national leadership. It is not enough to say funds are scarce/diminishing. A more powerful strategy would have acknowledged the need to pass a sales tax increase to fully fund the Natural Resources & Outdoor Recreation Trust Fund, a trust fund that a majority of Iowans supports and take aggressive action now.

The Science Assessment contains important information to guide policy makers. It is broad in scope, adequately detailed and appropriately referenced. However, I have been unable to find a citation to a Baker and Helmers paper, the basis for a paragraph in the policy discussion and a slide in the webinar that was also included in the webinar. The paragraph from NRS-1:

Note...this paragraph had to be copied as a picture from the online document and cannot be pasted into this document. The paragraph begins "According to Baker and Helmers..." and ends "When that happens some nutrients are certain to be lost." I find it interesting to have encountered this difficulties when trying to understand statements that are so central to the policy strategy.

Without reading the whole paper I am forced to accept the implication that since nutrients are naturally going to come out of soil, Gee, there s nothing we can do! where the we is farmers. This is simply not true as the various scenarios show. If there were a simple solution Iowa or if its recent history reflected a more aggressive commitment, the state s water quality problems would be much more manageable. Strategies important to going forward now need not be perfect. Much of the policy discussion seems an effort to avoid doing anything.

Name Thomas A. Evans
City Granville
State Ohio

Providing comment on the following sections:

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

I have lived in Licking County, Ohio since 1968. Licking County is the home of the Croton Egg Farm, a CAFO founded in 1980 with a remarkably bad environmental and animal care history. A group that included Jack DeCoster, whose participation was initially hidden because he was banned from operating in Iowa, eventually replaced the original ownership. Recently DeCoster and his group were replaced by an ownership group that includes individuals from Sioux County, Iowa. Now permitted to house more than 7 million hens, the egg CAFO seems to be a more responsible operation today. However, the environmental and animal care violations of the past happened and they happened despite the fact that the headquarters of the Ohio Department of Agriculture is also in Licking County and the state s land grant school, Ohio State, is less than an hour s drive from the egg CAFO, neither organization able to influence the decisions of owners/managers controlling the quality of the operation. Their failure should not be interpreted as an excuse to abandon regulatory efforts or research. The Strategy offers the promise of a new era of cooperation without any evidence of a dramatic change in attitudes that block N and P reduction efforts or benchmarks for attitude adjustment efforts. The values of those who operate facilities, from the smallest farm to the largest CAFO determine the success of any strategy informed by science and technology.

Neighboring states whose approaches informed aspects of the Strategy do not include Ohio. I draw your attention to Ohio s Clean Lakes Initiative, http://www2.ohiodnr.com/cleanlakes/ a belated effort established in July 2012 to bring under control the eutrophication of Lake Erie and Grand Lake St. Marys. Grand Lake St Marys is more than 3 times larger than West Lake Okoboji but much shallower, ranging from 5 to 7 feet deep, but still an important recreational resource in Ohio. Millions of dollars have been spent adding alum to precipitate dissolved phosphate in Grand Lake St. Marys and a manure management regime has been put in place, part of an overall strategy for improving water quality in the lake. http://ohiodnr.com/tabid/22790/default.aspx The Grand Lake St Marys watershed was designated a watershed in distress in 2010. Since then rule making has included the following provision:

By December 15, 2012 farm owners/operators or person(s) responsible for producing, applying, or receiving in excess of 350 tons and/or 100,000 gallons of manure on an annual basis shall develop and operate in conformance with a nutrient management plan. This plan must address the method, amount, form, placement, cropping system and timing of all nutrient applications.

It is difficult to predict the effectiveness of this regulation. After ten years there will be information about management plans and practices but the adoption of improved methods is not guaranteed. How many farmers will ship their manure to another watershed? How many farmers will adjust their load so it falls below 350 tons or 100,000 gallons? However, this is an example of unnecessary regulation according to the Strategy even though it s basically a voluntary approach to gathering information about what is going on. Some aggressive rules are required in Iowa just to obtain data and perform the research that the Strategy identifies as desirable. Water quality in Iowa will get worse before it gets better. Waiting until we can predict the weather or the price of corn and beans should not be considered an option.

A number of citizen groups have advocated initiatives to improve the water quality in Lake Erie and Grand Lake St. Marys over the years. I was amused to see a slide of a burning Cuyahoga River, which flows through Cleveland into Lake Erie at the beginning of the webinar presentation. However, water quality is not a laughing matter and it is taking too much of citizens advocacy efforts for what is being accomplished in Ohio or Iowa. Biology, the presence of the Iowa Lakeside Laboratory, and effective citizen groups in Dickenson County assures that most of the Iowa Great Lakes will avoid the fate of Grand Lake St. Marys, which will probably remain compromised for several decades. A Spencer High School classmate has made many trips to Des Moines to urge action that will protect the environmental and recreational values of the lakes. While attention should be paid to approaches and accomplishments in protection of the Iowa Great Lakes, duplication of this kind of citizen involvement across the state does not seem feasible. The scientific assessment offers a range of options but there is so little actual detail in the policy discussion of the Strategy in contrast to the USEPA comments on the draft Strategy that it is easy to conclude that nothing is feasible and that policy makers really don t care, expecting that some sort of minimal effort over the next several years will satisfy their constituencies and somehow get past the Basin Task Force and the US EPA.

The cartoonist Ding Darling is important to the conservation history of Iowa and the nation. His first conservation cartoon appeared in the Sioux City Journal in the 1920 s in response to packing plant pollution problems in the Floyd River. At the time there were two options being considered, straighten the river so that the detritus moved down river faster or protect the river from the detritus. The decision was made to straighten the river. Straightening rivers is not an option for protecting the Gulf of Mexico from Iowa nutrients. Were Ding Darling to draw a cartoon response to this draft Strategy it would not be kind.

I have developed a particular interest in the state nature preserves of Ohio and Iowa, drawn to them initially by the severe funding cuts suffered by the Ohio Division of Natural Areas and Preserves. My wife and I have visited many state nature preserves in Iowa and Ohio. The natural features they contain and the values and commitments of those who created and maintain them and bring the special qualities of these preserves to the attention of visitors have impressed us. The draft Strategy makes clear to these people that what they value in Iowa s streams, rivers and lakes is not valued by powerful forces in the state who are prepared to block any significant progress. This is the 21st century. It is unacceptable to just say, we need more time and data as a reason for avoiding serious commitment to improve water quality. This Strategy needs to address seriously why needed data are not available now. This is not a new problem.

Northeast Iowa is known for its beautiful bluffs and their limestone cliffs. The limestone layers were created several million years ago, sometimes interspersed with loose material when conditions were not right for forming solid rock. I conclude from reading this draft Strategy that conditions are not right for really solving Iowa s water quality problems. Water quality across the state will get worse. Some future group will be charged with developing a new strategy. Hopefully, conditions will be better.

Name Thomas A. Evans
City Granville
State Ohio

Providing comment on the following sections:

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

Sincerely yours,

Thomas A. Evans

226 South Main Street

Granville, Ohio 43023

Timestamp 1/18/2013 12:41

Name Donald Swanson
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

As a sixth-generation farmer in Wapello County, caring for our land and preserving it for future generations is our top priority. That is why we support the nutrient reduction strategy and voluntary conservation.

We have implemented many conservation practices to protect the water quality for ourselves and our livestock and to enrich the land for it to continue to take care of us for many more generations.

The conservation practices that we have voluntarily implemented include the use of cover crops, building terraces, leaving grass waterways and controlling manure run off with a catch basin. We know how important these and other conservation practices are in maintaining the viability of our farming operation.

Please support the nutrient reduction strategy and do not add more costly regulations.
Thank you. Donald Swanson

Timestamp 1/18/2013 12:44

Name Brian Hoffman
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 land owner who already practices voluntary conservation practices, I urge you to continue to support funding for those programs. Without funding,delays for these projects would turn back the clock for conservation instead of allowing us to move forward and saving and improving our valuable farmland. Brian Hoffman

Timestamp 1/18/2013 12:45

Name laurie mcknight
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 express my support for the Iowa Nutrient Reduction Strategy. It is a voluntary science based-program that needs to be adequately funded.For the most part farmers have always done their share when cost-share funds were made available. laurie mcknight

Timestamp 1/18/2013 12:49

Name Kevin S. Vinchattle
City Urbandale
State Iowa

Providing comment on the following sections:

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

These comments are submitted on behalf of the Iowa Poultry Association.

The Iowa Poultry Association is supportive of the Iowa Nutrient Reduction Strategy.

Iowa s natural resources are of utmost importance to the people of Iowa. It is these resources that sustain our lives and our livelihoods. No one knows better than we here in Iowa how to go about protection efforts.

The current strategy is the result of a comprehensive collaborative effort. We believe it is focused on efforts that can be controlled versus arbitrarily set numeric standards.

The men and women involved in feeding a hungry world will do everything they can to protect natural resources. It is these same resources that fuel their food-producing (farming) operations. The key to assisting agriculture is to provide the flexibility to respond. Prescriptive approaches that lack flexibility will not work.

Again, we are supportive of this strategy.

Timestamp 1/18/2013 12:52

Name Andy Gonseth
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

With our every growing population in this country, there is more requirement for farmers to grow more food to feed the needed supply for growth. But as farmers agricultural production grows, the need for conservation projects, and the funding needed to implement these programs, needs to continue, and grow in the funding to support such needed programs. As a farmer myself, i ask you to fund the Iowa Nutrient Reduction Strategy, that recognizes the importance of voluntary conservation practices and the need to maintain agricultural production in the state of Iowa. Andy Gonseth

Name Jodi Enos-Berlage
City Ridgeway
State Iowa

Providing comment on the following sections:

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

As a scientist, educator, member of a local watershed improvement association, lead researcher on a collaborative watershed monitoring project, daughter of beef farmers, co-owner of a small livestock farm, and spouse of a 20-year Farm Bureau member with dairy interests, I offer the following comments to the developers of the Iowa Nutrient Reduction Plan:

1. The science assessment is impressive and will serve as an invaluable starting resource for Iowa and other Midwestern states to improve water quality. In particular, the tools that the science assessment provides will make development of a nutrient reduction strategy possible. However, the science assessment is missing a critical component, specifically a section devoted to the social science aspect of this project. A large amount of research exists on why humans make the decisions that they do, and the types of incentives and disincentives that are effective in influencing these decisions. Given that success of the strategy will be completely dependent on human decision-making, much of it at the level of individuals, it is essential to include this data in the science assessment and use it to help shape the policy/strategy section.

2. The strategy outlined for point source pollutants is for the most part clearly articulated, with specific goals and mechanisms to achieve them, both in terms of structure and expected financial support. However, the details provided primarily target municipality-based nutrient reduction, with relatively little attention to that which is industry-based. In addition, timelines for point source nutrient reduction are lacking. These elements should be included.

3. The strategy outlined for non point source pollution is severely lacking in multiple essential elements if it is to be called a strategy . In particular, the following issues deserve attention:

a. The strategy needs specificity in terms of goals, mechanisms to achieve goals, implementation plans, and timelines. Although the document does indicate that higher contributing watersheds will be prioritized, it is not clear what will happen in these watersheds as a result of them being targeted. In fact, the writing is so nebulous that it is difficult to discern what the document is actually trying to communicate. A strategy is defined as a method or plan chosen to bring about a desired future. This document, as currently written, lacks both a plan and a method.

b. The background information seems defensive and partial, collectively damaging the credibility and science-based nature of the document. For example, the document focuses only on the problems with establishing numeric criteria (and not potential benefits), the challenges of adopting best management practices (rather than the new opportunities provided by the science assessment), and the progress that has been made in Iowa conservation (rather than acknowledging that past efforts, while valuable, have been insufficient, or exploring why this is the case, e.g., is it possible that increased corn/soybean acreage or tiled acreage negate those conservation efforts in terms of the total nutrient output?). The problem is not so much what is included in the background information, rather, what is missing. This approach does a disservice to all stakeholders, suggests a biased viewpoint, and ultimately will inhibit development of an effective solution.

c. The strategy appears to be based primarily on attempts to expand current practices, yet evidence that current practices can i) achieve the desired goal, or ii) be realistically expanded, is not included. Nutrient reduction watershed projects (on a more local scale) have been ongoing in the state for a long time. What is the evidence that they have been successful (in terms of percentage of landowners involved, practices implemented, and improvements in water quality)? If successful models do exist, what is the evidence that they are expandable (in terms of increased numbers of willing landowners and financial resources)? These elements are critical for convincing Iowans that the plan has a chance of working. If such evidence does not exist, the strategy needs serious revision.

d. As outlined, the overall strategy will require tremendous financial resources, yet the sources specified are entirely inadequate. Although the document clearly indicates expected increased contributions from municipality residents (and rural residents who purchase properties needing septic upgrades), there is no comparable expectation stated for industries, agricultural producers, or Iowa taxpayers. Everyone benefits from improved water quality and should be expected to help support this effort. However, the request for public support would be greatly strengthened by explicit, concurrent requests for industries and agricultural producers to make a larger conservation/nutrient reduction investment in their own operations, especially in the midst of a historic agriculture economic boom that has given producers the financial ability to make unprecedented investments in land and equipment. In fact, if the strategy does not include such expectations for the businesses that profit while adding to the nutrient load, it is hard to imagine how it will ever win taxpayer support.

e. The strategy, as currently written, is severely lacking in innovation. This omission is by far the biggest disappointment and the reason that both farmers and scientists have privately stated to me that it will never work. In fact, comments from several farmers inspired many of the points below. Specifically, an innovative strategy would be one that:

Name Jodi Enos-Berlage
City Ridgeway
State Iowa

Providing comment on the following sections:

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

o Uses substantial incentives to engage all landowners in a watershed.

o Involves policies that offer a middle ground between a voluntary vs. mandated strategy (recognizing that both have advantages and drawbacks). Such policies, which preserve freedom of choice but create incentives/disincentives that promote positive choices, exist and can be found in social science research.

o Has local control and leadership, chosen from and by watershed landowners

o Offers both flexibility and responsibility to individual landowners

o Levels the financial playing field between farmers who are willing to make nutrient reduction investments and those that are not

o Establishes a local nutrient reduction goal, a timeline to achieve that goal, and financial opportunities for those willing to adopt practices before the end of that timeline

o Establishes a plan B that will be implemented in case goals are not met by the timeline; landowners most affected by plan B would be those that had not yet engaged

o Fairly addresses the responsibilities of absentee landowners/renters

o Offers watershed-scale planning, authority, and resources, recognizing that some of the most effective nutrient reduction strategies in a watershed (and costs) will not be distributed equally along property lines

o Consistently and regularly discloses (to all Iowans in an accessible form) the progress of all watershed projects in the state, highlighting those watersheds that have made the most progress, and the least

In summary, I want to emphasize that the substantial time and thought that went into these comments was driven by real concern for the future of water resources in Iowa (and other states). I sincerely hope that the developers of the Iowa Nutrient Reduction Strategy take the necessary time to carefully review all of the public comments, consult additional resources, and revise the strategy accordingly. To rush forward with this plan (and costs), whose policies have not been supported (at least privately) by any of the stakeholders I have engaged with, would be a mistake. With the inclusion of a social science element, the science assessment is ready to move forward. The policy section, on the other hand, is in need of much additional work. The State of Iowa can do much better. The tools are available to create a plan, an innovative plan, that Iowa leaders, agriculture producers, and citizens can all be confident of and proud of. I look forward to seeing a revised document that incorporates the public review. Thank you for the opportunity to comment on the strategy.

Sincerely,

Jodi Enos-Berlage

Ridgeway, IA

Timestamp 1/18/2013 1:03 PM

Name Gary Johnson
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

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

Timestamp 1/18/2013 1:04 PM

Name Teresa Schulte
City Iowa City
State Iowa

Providing comment on the following sections:

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

Thus far what I've seen of the Nutrient Reduction Strategy is incredibly lacking and pandering to corporate interests. As an alum of Iowa State, I'm saddened to see the university connected with this. Why was there no transparency and why did the Farm Bureau write it? At this point the Farm Bureau represents big corporate farms much more than the 'little guys' and corporations look at the bottom line and making a profit, not what is good for the environment. Where are the specific practices that need to be followed to reduce nutrient runoff and soil erosion? Quit with the vague ideas and get practical! Also, these strategies need to be mandatory, voluntary practices will not work, corporations will claim they can't voluntarily do them because it'll hurt their profits and then the little farmers can't do them as it will cost them and, since the big farms aren't doing them, they'll be run out of business. I remember learning about soil conservation practices way back in the 1970's-early '80's and I cannot believe that we are STILL having these discussions about what our lack of action is doing to the Gulf of Mexico! We must take responsibility for our pollution and save our soil, that means real action with real consequences for inaction and this includes EVERYONE, big corporations, small farmers, city people putting sprays on their lawns, all of us. Please act and think of the land, Earth before money!

Timestamp 1/18/2013 1:05 PM

Name Duane Vos
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

We all know volunteers can make a difference, and there is no exception when it comes to conservation practices in Iowa. Voluntary conservation practices along with maintaining agricultural production can be achieved by supporting a science-based state nutrient reduction strategy.
Iowa's conservation cost-share programs along with the Iowa Nutrient Reduction Strategy must be funded, or risk being delaying needed conservation projects. I ask as lawmakers, you support this funding.

As families, friends, neighbors all in the same agricultural community, we need to share our current conservation practices, future planned practices such that our farms and surrounding environment reap the benefit. Duane Vos

Timestamp 1/18/2013 1:07 PM

Name David Prose
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Please help us protect iowa's environment by funding the nutrient reduction strategy and other conservation cost-share programs. David Prose

Timestamp 1/18/2013 1:08 PM

Name Derek Von Ahsen
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

My name is Derek Von Ahsen. I am writing today to let you know that I, as a farmer in iowa, am in full support of the Nutrient Reduction Strategy. This is one project I belive will help all farmers and the enviroment at the same time. I also belive by stepping up and working at this now, we will save our selfs a lot of future headachs and frustration. This will not happen without your support. We need you as leaders to step up and fund these programs.

Myself as a farmer am trying to do my best on my own with these practices. I am a firm beliver in no-till, buffer strips, and other practices that will beneifit not only us but our children as well. Please stand up and help us help our future. Thank you Derek Von Ahsen

Timestamp 1/18/2013 1:08 PM

Name Douglas Boland
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

We all want clean waterand I have been voluntarly working to improve the water ways on my farm,using notill whenever posible and seeding steeper slopes, to retain my soil and nutrirnts, and insure any water leaving my farm is as clean as possible.

Your support for a science based nutrient reduction program and funding for conservation projects, on a voluntary basis will be greatly appreaciated. Douglas Boland

Name Heath Gieselman
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 the Iowa Nutrient Reduction Strategy. This type of approach is the most effective way to implement sound conservation practices and reduce runoff related to agriculture. I feel the implementation of strict regulations would not only hurt our agriculture economy and production but also be impractical to implement due to the high cost of enforcement and the resulting bureaucratic quagmire.

It is important that you act to fund this strategy and other conservation practices. Funding should include cost-sharing with agriculture producers to expedite the implementation of conservation techniques. Funding should also include continued research of conservations methods which can be used to improve the nutrient reductions strategy in Iowa. I feel the research should focus on evaluating the performance of conservations methods such that a Best Practices guide can be developed and implemented. Perhaps this guide can be based upon the 8 major landform regions in Iowa and a quantitative performance index of various conservation practices can be determined to assist in reaching the goals that have been set forth by government agencies. These steps have already been started in the Iowa Nutrient Reduction Strategy and should continue to be developed with further funding.

On our farm we value the use of conservation practices. We use such techniques such as variable rate fertilizer spreading, reduced tillage practice, and split nitrogen applications to minimize our nitrogen inputs. We also have established riparian buffer strips, long term tree plantings, and erosion control structures such as permanent waterways and terraces or berms. As Iowa farmers we feel it is our duty to care for the land in a way that it will continue to produce food and feed the world and I feel that the majority of producers in the agriculture industry share this goal with us.

Feel free to contact me with questions or comments. Heath Gieselman

Timestamp 1/18/2013 1:10 PM

Name Jeremy Atwood
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Farm Bureau is asking its' members to write our elected officials asking their support of the Iowa Nutrient Reduction Strategy and it's funding. I am not very familiar with this plan or how much it costs. I would just ask for common sense when looking at something like this and how much it costs. Conservation of our land and water is key to preserving our resources for generations to come. Cost share programs can provide the needed incentive for some farmers to go above and beyond what they are already doing for conservation. Jeremy Atwood

Name Chad Hafkey
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 due to voluntary implementation of science based conservation practices. They may be applied where deemed appropriate by each operator allowing agricultural production to maintain the current output trends. This strategy demostrates the producer's desire to care for soil and water while establishing crediblity of modern agricultural practices and adding validity to conservation efforts.

Success for the strategy and the state's other conservation cost share programs is highly reliant on the funding levels. Failure to adequetly fund programs in the past has impeded the progress desired by operators on conservation practices that benefit their farm and the surrounding enviroment. I encourage you to provide the funding necesassary for a successfull particpation rate in the strategy. This is crucial for it to be effective in its's role of nutrient reduction and hopefully maintaining a voluntary basis.

I have been fortunate for the opportunity to utilize the state's cost share programs involving reshaping and establishing eroded waterways as well as instalation of tile to protect the waterways. The cost share was absolutely imparetive in helping persuade landowners of rented farms that fell in the same watershed as the farms we own to participate in the efforts to protect soil and water. These efforts have been noticed and appreciated by many in the community from compliments I have recieved for these actions. Chad Hafkey

Timestamp 1/18/2013 1:15 PM

Name Chasen Stevenson
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am a third generation farmer operating in the Marion county area. My father, brother, and I have row crops as well as a cow calf herd. At this point our farm implements a variety of conservation practices, voluntarily, that is aimed at keeping the rich Iowa soil where it belongs and keeps nutrients where the crops can use them. Terraces, waterways, buffer strips, and headlands are a few examples of what we already do.

In my situation having a science based nutrient reduction strategy that is voluntary really makes since. I like to look at how different practices have worked in different areas. And I believe this is the feeling of most farmers out there. One practice that I am very interested in is cover crops. If there was a way to cost share some of these practices that will make it more economically feasible for producers those options should be looked at.

I feel the farmers and ranchers of Iowa when given the chance, and the means in which to do it, will voluntarily use more conservation practices. This won t happen overnight, but with science and research the farmer and ranchers of this state will make a difference. Chasen Stevenson

Timestamp 1/18/2013 1:18 PM

Name Emily Wuebker
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I encourage you to support the science-based state nutrient reduction strategy. It recognizes the importace of voluntary conservation practices and the need to maintain agricultural production. I urge you to adequately fund Iowa Nutrient Reduction Strategy, as well as other conservation cost-share programs. If Iowa's failure to fund these programs in the past has delayed needed conservation project. Emily Wuebker

Timestamp 1/18/2013 1:19 PM

Name Sara Adrian
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 you today in support of the Iowa Nutrient Reduction Strategy and am asking that you adequately fund the program, as well as other conservation cost-share programs. The strategy is a science and technology-based approach developed by the Iowa Department of Agriculture and Land Stewardship (IDALS), the Iowa Department of Natural Resources (DNR), and Iowa State University (ISU) to encourage the adoption of voluntary conservation practices that will have the greatest benefit for water quality in the state. It uses ISU research to determine which practices are most effective when applied to Iowa s unique landscapes. The strategy outlines these efforts in a scientific, reasonable and cost-effective manner.

My husband and I are constantly looking for ways to improve and protect our environment and water, but a program such as the one imposed on farmers in the Chesapeake Bay area would not be smart. How we farm and where we farm in Southeast Iowa is much different than someone who farms in Northeast Iowa, therefore a one-size-fits-all regulation could do more harm than good.

Again, I am asking for adequate funding of the Iowa Nutrient Reduction Strategy and other conservation programs. Failure to sufficiently fund similar programs in the past has delayed needed conservation projects. Sara Adrian

Timestamp 1/18/2013 1:24 PM

Name Cale Plowman
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Please fund the Iowa Nutrient Reduction Strategy so farms like mine can voluntarily maintain and improve our conservation practices. Cale Plowman

Timestamp 1/18/2013 1:27 PM

Name Scott Sieren
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I'm contacting you today to express my support for continuing voluntary conservation practices as

as a viable solution for nutrient reductions in our state. On our own farm we maintain a wide variety of conservation practices that include grass waterways, field borders and contour strips as well as terraces. Many of these practices have been installed voluntarily or funded with cost-share conservation program dollars.

I urge you to continue to fund these programs as well as the Iowa Nutrient Reduction Strategy. We can continue to do what's best for our state on a volunteer basis at the state and local level.

Name Scott Sieren
City
State

Providing comment on the following sections:

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

Name Scott Sieren
City
State

Providing comment on the following sections:

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

. Scott Sieren

Timestamp 1/18/2013 1:33 PM

Name Peter Alexander
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

With the budget surplus that the governor has boosted about, please fund the nutrient reduction stragety fully. Has a cattlemen and a farmer, I already practice voluntary practices. One reason just common sense and the other becuase my children have come home from school and told me how I pollutte the world. So practicing measures has two meanings for me to prove to my children that I do care about the world and the other is to prove to the teachers that they are full of it.
Please fund this project that other dads can prove to their kids that the care about the world. Peter Alexander

Name James Dane
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I want to add my voice to the widespread acclaim for the Iowa Nutrient Reduction Strategy.

Voluntary conservation practices work. I've been using them widely on my farm since the 1985 Farm Bill. It is much better to bring farmers along willingly than to set up strict rules and harsh penalties.

In addition to planting every acre using no-till farming methods, I have field buffers along every stream and creek on my farm. I also have buffer strips that break up my long slopes to reduce the speed of water and soil erosion. Further I have strategically placed strips of Conservation Reserve Program lands that take my most erosive soils out of continuous row-crop production.

But I know I can do better as I learn better ways to control erosion and reduce nutrient run-off.

I urge the Iowa Legislature to fully fund the Iowa Nutrient Reduction Strategy. Other states are watching us to see how the leading agricultural state treats its greatest resources--with respect and science-based strategies or with rules, regulations, and penalties.

I believe we are fortunate to put together the resources of IDALS, the DNR, and ISU to develop a comprehensive strategy to reduce nutrient loss.

Let this process work.

Thank you. James Dane

Timestamp 1/18/2013 1:39 PM

Name Roger Maddux
City Ames
State Iowa

Providing comment on the following sections:

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

The proposed Iowa Nutrient Reduction Strategy, according to the document itself and according to the explanations of the strategy provided at the informational meeting in Ames, is predicated on the idea that Iowa farmers, if asked, will do much, much more to reduce water pollution than they have done during the past thirty years, and will do so at their own expense, since public funds are in short supply. The strategy contains no timetables, no clear goals, no significant funding, no real implementation plan, no accountability, and no reason for Iowans to believe that most farmers will not continue to respond to the current strong economic incentives that have been driving row crop production up and water quality down. In fact, all Iowans familiar with agriculture will realize that all production farmers will do far, far less to control pollution. They will all tear up all the fence rows, plow up all the CRP, farm all the pastures, and dump absolutely incredibly huge amounts of fertilizers on their land to increase production as much as possible, thereby drastically increasing water pollution in Iowa, in the Mississippi, in the Gulf, and the world.

As a political means of keeping the EPA off Iowa's back and postponing serious action on water quality for at least a few years, this strategy, if it were adopted, might be successful. As a means of actually cleaning up Iowa's dirty water, it will most definitely and obviously fail. Requiring towns and cities to take action cannot succeed as long as action by agriculture, which is the major source of the nutrient problem, continues to be completely voluntary. The primary blame for water pollution lies squarely on farmers. They are the ones who create the vast majority of the nutrient and sediment pollution, and this strategy is designed to encourage them to keep doing it. After all, requested action by farmers is "only voluntary", so the message to them is, "you really don't need to worry about doing anything about water pollution".

Like many other Iowans, I've been going out of state every year to enjoy outdoor recreation in clean water. I would like to be able to enjoy clean water where I live. Like a few other Iowa landowners, I've been converting formerly row cropped land to prairies and wetlands, partly for the sake of water quality. But as was pointed out in a recent ISU report, many Iowa landowners and operators are doing little or no farm conservation at all. This strategy is not only inadequate, but is also unfair to conservation-minded landowners and operators, to urban Iowans, and to all the citizens of Iowa who help to support agriculture through our taxes and who also want cleaner water.

Timestamp 1/18/2013 1:45 PM

Name Brent Koller
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I m asking for your support for the Iowa Nutrient Reduction Strategy. This is a science-based program that voluntarily implements conservation practices on our important agricultural land. A failure to fund this program will delay the needed conservation projects. This investment is needed for today and future generations of Iowans. Brent Koller

Name Ed Ulch
City Solon
State Iowa

Providing comment on the following sections:

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

Such an attempt needs to be all inclusive if it is going to be effective. This includes nonfarm reduction particularly municiple waiste and inustrial pollution.

From an agricultural standpoint, I feel we have been effective on our farm and we need to be since our run off goes into the prestine Lake MacBride. We have done multiple programs including stream bank protection, tarrices, grassed waterways, filter strips, ponds, wet land creation, wildlife cover, side dress fertilizing, tree planting, no till since 1978, and using cover crops. We are apparently doing the right things since we won the American Soybean Associations National Award for Conservation last year. This is the enviornment we live in too and the water we drink.

There seems to be evidence that cover crops do even more good than we realize. If managed properly they protect the soil from erosion, recapture left over nutrients from the previous crop to be mineralized for the next crop, improve the soil structure and it's ability to hold water, air and nutients. This attempt ought to go beyond nutrient reduction to nutrent management.

Timestamp 1/18/2013 1:52 PM

Name Rodney Swales
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Gentleman the state of Iowa will be looking at the Iowa Nutrient reduction strategy plan as a way to continue To improve the quality of Iowa a water in Iowa by encouraging the use of best management practices for soil conservation and nutrient plans was developed by the Iowa Department of land stewardship Iowa Department of Natural Resources an Iowa State University. The plan uses very sound science and technology ideas. Iowa farmers have made great advancement over the years to help to help conserve soil and reduce the use of manure or chemical based nutrients in Iowa. This plan will help us to continue or work is improving our water Quality thank-you Rodney Swales Rodney Swales

Timestamp 1/18/2013 1:53 PM

Name Jane Alexander
City Jefferson
State

Providing comment on the following sections:

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

The strategy for non point source pollution (farm runoff) is doomed to failure because it is merely status quo. All voluntary programs have failed to curb pollution up to now and there is no evidence they will not continue to fail.

The strategy fails to define goals for clean water. This is not surprizing since it was written by the Farm Bureau who want to pretend farm pollution doesn't exist.

The strategy doesn't say where the funding will come from or put a value on the benefits of clean water.

The strategy makes no mention of the unchecked growth of CAFOs in Iowa which dump huge amounts of pathogenic slurry into our soil and water even in sub watersheds already defined as high priorities for nitrate reduction.

Timestamp 1/18/2013 1:58 PM

Name Lynn Olsen
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I have farmed for 40 years now and have always complied with conservation practices to protect the water. I have done so by building terraces to protect run off into the creeks also using some buffer strips. I want to continue to be part of the solution to this problem.

I would urge you to support a science based state nutrient reduction strategy that recognizes the importance of voluntary conservation.

New regulations in our fine state is NOT the answer.

Thank you. Lynn Olsen

Name Tim Harden
City Cedar Rapids
State Iowa

Providing comment on the following sections:

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

January 18, 2013

VIA ELECTRONIC SUBMISSION:

Mr. Chuck Gipp, Director

Iowa Department of Natural Resources

Wallace State Office Building

502 East 9th Street

Des Moines, Iowa 50319

Mr. Bill Northey, Secretary of Agriculture

Iowa Department of Agriculture and Land Stewardship

Wallace State Office Building

502 East 9th Street

Des Moines, Iowa 50319

Re: Iowa Nutrient Strategy Public Input

Interstate Power and Light Company

Dear Mr. Gipp and Mr. Northey:

Interstate Power and Light Company (IPL) is an Iowa-based electric and gas public utility engaged primarily in the generation and distribution of electric energy and the distribution and transportation of natural gas in selected markets of Iowa and Southern Minnesota. IPL supplies electric service to over 500,000 customers and natural gas service to over 200,000 customers.

The Iowa Department of Natural Resources (IDNR) and Iowa Department of Agriculture and Land Stewardship (IDALS), in conjunction with Iowa State University, have requested public input on the draft of the Iowa Nutrient Reduction Strategy (draft strategy) released November 19, 2012. The purpose of the draft strategy is to detail Iowa s state-level plan for reducing nutrients, per response to the 2008 Gulf Hypoxia Action Plan.

IPL commends the collaborative effort utilized in composing the draft strategy and appreciates the opportunity to provide comment. IPL is supportive of the long-term reduction goals outlined in the draft strategy, but feels the draft strategy could benefit from additional clarity regarding near-term goals, measurability and detailed implementation requirements for industrial point-sources.

IPL has the following suggestions for improving the clarity, structure and scope of the draft strategy.

1. Provide a clear application and consistent language for all stakeholders. The Preparation and Presentation section of the draft strategy states that the strategy outlines voluntary efforts . However, the draft strategy goes on to detail point-source requirements that are linked to National Pollutant Discharge Elimination System (NPDES) permits. NPDES permits are mandated under the Clean Water Act for certain affected sources, including steam electric power plants. IPL understands such efforts may include data collection requirements, which could be imbedded into facility NPDES permits, and therefore could be interpreted as compliance requirements. This may create confusion for point-sources and seems to imply that the voluntary aspect of the draft strategy is only applicable to non-point sources. Additionally, in the

Name Tim Harden
City Cedar Rapids
State Iowa

Providing comment on the following sections:

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

Point Source Policy section (p.2) the draft strategy states & will require implementation& and goes on to detail targeted reductions of 2/3 total nitrogen (TN) and 3/4 total phosphorus (TP) from levels currently discharged. These statements would seem to contradict requirements detailed in Section 3 for point-source facilities at or below the 10mg/l TN and 1mg/l TP thresholds. Further clarity and consistency is desired here.

2. Categorize point-sources and utilize a consistent outline. IPL feels the draft strategy could provide greater clarity through categorically grouping point-sources and utilizing a standardized strategic outline to provide nutrient reduction goals, implementation and measurability details. One approach could be to group Publicly Owned Treatment Works (POTWs) separate from all other point sources. This would allow a more target-specific strategy to be developed and tailored to each group of point sources. Currently, the draft strategy seems to provide a one size fits all approach. The draft strategy clearly outlines the three tiers of removal and the technology based and Water Quality-Based limits for POTWs. That same structure and clarity is absent for industrial point sources, especially in the Implementation Plan Detail section.

3. IDNR and IDALS should consider adding no action and net-addition language. IPL feels the strategy language should incorporate a no action requirement for facilities with effluent at or below the proposed TN and TP limits. Additionally, the strategy should consider inclusion of net-addition language for facilities withdrawing surface water, such as once-through cooling water. Those facility s discharges should be subject to the limit on a net-addition basis, to account for existing concentrations present in the surface water.

4. Feasibility study implementation. IPL feels further development of the feasibility study requirement is necessary for providing a clear understanding of its purpose. In the draft strategy it is unclear who conducts the feasibility study, when the study does or doesn t need to be conducted, how the feasibility study differs from antidegradation, and if there are mandatory requirements resulting from the feasibility study.

5. Provide a means to account for measurability. IPL would encourage the development and inclusion of a measurability section. Since the NPDES permits are issued on a five year rotation it s possible that process changes could allow a point-source to reach their reduction goal prior to the next permit renewal. Including a measurability detail that offered an incentive for reaching the reduction goal may yield favorable results more efficiently.

6. Exploration of credit trading. Page 17 of the draft strategy mentions credit trading under the section discussing the effectiveness of point source permitting. IPL is very supportive of the concept of a trading program and is open to further discussions in developing such a program.

IPL would encourage IDNR and IDALS to further involve point-source stakeholder input while developing a final strategy. IPL supports the creation of a stakeholder committee organization to assist in this process and would offer a representative if a stakeholder group is created.

IPL appreciates the opportunity to provide this input. If you have further questions, please contact me at (319) 786-4172.

Respectfully Submitted,

Tim A. Harden

Environmental Specialist II

Alliant Energy Corporate Services, Inc.

on behalf of Interstate Power and Light Company

Timestamp 1/18/2013 2:02 PM

Name Chris Perdue
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Iowa farmers care about the land and water quality. They raise their families on farms and want to protect the quality of the water for future generations.

A science-based state nutrient reduction strategy that recognizes the importance of voluntary conservation practices is needed at this time. I urge you to adequately fund the Iowa Nutrient Reduction Strategy. This reasonable and cost-effective strategy is a science and technology based approach used to encourage the adoption of voluntary conservation practices that will have the greatest benefit for water quality in the state. Chris Perdue

Timestamp 1/18/2013 2:06 PM

Name Stacy Young
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I support the nutrient reduction strategy that has been talked about but only on a voluntary basis and I also think there should be a longer period for comments because we have only just started to hear about the program. Many of the meetings that will be happening throughout the state have not even occurred yet. Please also be mindful of the fact that when developing these new strategies that there is enough money to fund them adequately. We developed a waterway 2 years ago with a conservation program that was done with NRCS and we thank for helping us with that program. Let me know if I can be of any assistance. Stacy Young

Timestamp 1/18/2013 2:07 PM

Name Eric & Stacie Johnson
City Cedar Rapids
State Iowa

Providing comment on the following sections:

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

Voluntary reduction strategies, especially in rural Iowa, have been encouraged the early 1930s in Iowa through Soil and Water Conservation Districts. For argument sake, let's say 1940 - that means for SEVENTY-TWO YEARS we've funded and worked with farmers to reduce non-point source pollution! It is a sad state of affairs that we (Iowans) haven't figured out solutions that are both economical and environmentally safe during the course of 72 years! There are many things that can be done to reduce the amount of non-point source pollution in Iowa.

NUMBER ONE) DNR - get serious about enforcement! Regulatory agencies are not suppose to be anyone's friend - they are suppose to uphold the law. (The DNR reminds me of a parent that wants to be their child's "friend" - no good comes out of that parent / child relationship!) Start enforcing - there is no excuse any longer when it comes to the Clean Water Act. The Manchester Field Office had a grand total of two NPDES inspections during 2012 - TWO. Why? If I was a contractor or city - I know my chances of getting a visit by the DNR in the Manchester Field Office territory are pretty much nill with that inspection record.

2) The Department of Natural Resources should walk the walk. DNR owned land should actually incorporate water quality practices - either new projects or retrofits - that capture and infiltrate stormwater runoff. Any state park we visit is an example of what not to do - as the parking lots / roadways drain right into the body of water. Pleasant Creek in Palo is a great example of that as is Palisades near Mt. Vernon to name two.

3) Get serious about infiltration based practices- we have all this land, but "nowhere for rain to go." Field tile is fine - but daylight the tile into something that soaks up the runoff and cleans it up before releasing it to the closest body of water. The tile, like urban areas and storm drains, SHOULD NOT BE ALLOWED TO BE OUTLETTED DIRECTLY INTO A BODY OF WATER, weather it is a creek, stream or river, under any circumstances - while its the easiest thing to do, it is just plain short-sighted and does not take into account the pollution that is being carried via the tile.

4) All cities in Iowa should have a basic stormwater ordinance that requires the infiltration of at least the one inch rain, as well as an erosion and sediment control guidelines for construction sites. ALL cities, not just NPDES permitted cities.

5) NO BUILDING IN THE 100 year FLOOD PLAIN on all USGS "blue line" streams and rivers in Iowa. Not only does that help reduce flooding, it will also keep pollutants away from the immediate drainage area of a body of water.

This is a start that will go a long way to reduce the nutrients, as well as the biologically pollutants that plague Iowa waterways.

Timestamp 1/18/2013 2:11 PM

Name Eric Euken
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 encourage you to support the voluntary Iowa Nutrient Reduction Strategy. With Iowa's many different soils and topography, not to mention the many different types of farms and farming practices, we need a flexible set of science based standards for conservation. A large "one size fits all" standard may work for a handful of farms but neglect many others.

It is my belief that farmers will act appropriately in terms of conservation because in the both the long and short run it will benefit them and everyone else in many ways.

In order for all of this to work and to begin the process it does need adequate funding. With that funding in place it will encourage the larger practices that otherwise can not be feasible.

On my farm alone, I have built and maintained waterways, put in additional windbreaks, and have implemented the use of a hoop building to limit nutrient runnoff. I hope to do more in the way of grass buffer strips and building ponds in the future. Eric Euken

Timestamp 1/18/2013 2:13 PM

Name Mark Ogden
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I am taking this opportunity to urge you to voice support for the Iowa Nutrient Reduction Strategy, and more importantly support funding for this important effort.

The Iowa Nutrient Reduction Strategy built around a science and technology based framework developed by teamwork from the Iowa Department of Agriculture and Land Stewardship, the Iowa DNR, and ISU College of Agriculture and Life Sciences. The goal is to assess and reduce nutrients to Iowa waters and the Gulf of Mexico, from both point and non-point sources in a cost effective manner backed by science and reason.

I personally support this effort, and know firsthand, the importance of voluntary conservation practices to support and maintain production on our farm. I installed a pond structure, with prairie, grass strip and riparian features to protect waters draining into the Clear Creek watershed that ultimately drain to the Iowa River and Mississippi. This was a voluntary, cost share effort that is already showing benefits, while maintaining the farms production viability. Continued funding of these programs is vital.

I look forward to your support on this issue. Mark Ogden

Timestamp 1/18/2013 2:14 PM

Name Elizabeth Garst
City Coon Rapids
State Iowa

Providing comment on the following sections:

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

I am an Iowa farmer, and have utilized many conservation practices on a voluntary basis. However, I know that a voluntary approach is not sufficient, since we have been trying that method for decades, even as nutrient levels in water have increased. I see that some of my neighbors are bad actors. Iowa should make certain practices mandatory ... specifically we need buffers along streams and prohibition of anhydrous ammonia in the fall until soil temperature is below 50 degrees.

I agree that many practices are not universally appropriate (unlike the above), so it is also important that we move towards a results-based system, which includes extensive water testing at the field level.

The State of Iowa should establish numeric standards for nutrients.

The State of Iowa should adquately fund DNR manure management inspectors .... we need at least 20, not 2.

Timestamp 1/18/2013 2:16 PM

Name Clark Gaff
City Ames
State Iowa

Providing comment on the following sections:

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

Relying on voluntary measures to reduce nutrient runoff has not worked in the past 40 or so years and it will not work in the future. The strategy as written is bad policy-it lacks timelines, benchmarks, and incentives for farmers to reduce pollution. DNR Pollution experts were not used to help write the strategy. Studies have been done by them to identify degraded waterways and it is generally known what needs to be done to reduce runoff. The studies suggested in your strategy are probably just a stalling tactic by the Farm Bureau. New technologies may be helpful but they can be developed along the way as needed. No need to delay cleaning our waterways any longer. The policy was written without oversight or input from the public and with too much input and oversight of the Farm Bureau. Farmers are not the only ones affected by polluted waters. We all need clean water to survive. The main point I want to make is that farmers have not voluntarily cleaned up their act and there is no reason to believe they will now. Our water is some of the most polluted in the nation and this is what you and the farm bureau come up with? We need stringent regulations and consequences for not following them.

Timestamp 1/18/2013 2:18 PM

Name Tanner Rowe
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 know I support the voluntary conservation practices and science-based state nutrient reduction strategies. Also the need to maintain agricultural production.
I encourage you to adequately fund the Iowa Nutrient Reduction Strategy, as well as the state's many other conservation cost share programs. The failure to fund these programs will delay many needed conservation projects.
I have used these programs to build terraces and buffer-strips on many of our farms. Without these programs it is not cost effective for us to do such projects. Tanner Rowe

Timestamp 1/18/2013 2:19 PM

Name Nathan Thoreson
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I strongly urge you to fund the Iowa Nutrient Reduction Strategy and other cost-share programs. In the past, the failure to fund programs such as these has delayed much needed conservation projects. Funding this program will not only make our state's environment better, but will maintain our proud heritage as a leader in agriculture production. Nathan Thoreson

Timestamp 1/18/2013 2:24 PM

Name Rodney Sothman
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

I support the conservation practices the farmers do on a volunteer basis. Most farmers try to do conservation practices but it cost a lot to do such a thing.

We need to keep our conservation going so we have good land to farm in the future. Rodney Sothman

Timestamp 1/18/2013 2:31 PM

Name Joseph Elmquist
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. When something is science-based, there should be a greater voluntary response than if we are told to make drastic changes to our operation with no real evidence that what we are asked to change will improve the situation. I believe this is the best way to maintain agricultural production.

State lawmakers should adequately fund the Iowa Nutrient Reduction Strategy, as well as other state conservation cost-share programs.
Joseph Elmquist

Timestamp 1/18/2013 2:32 PM

Name Daniel Christensen
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

Voluntary conservation practices are very important and need to be maintained in ag production.

We, as agricultural professionals, need our legislative leaders to make sure there are enough funds for these voluntary conservation programs. Delaying the projects helps no one.

Thank you for taking the time to read my note. Daniel Christensen

Timestamp 1/18/2013 2:34 PM

Name Dale Boelman
City
State

Providing comment on the following sections:

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

Secretary of Agriculture Northey,

As a livestock farmer I feel we need to base the Iowa Nutrient Reduction Strategy using science based facts. I personaly use grass strips and inject my manure Dale Boelman

Name Kevin Kirlin
City West Des Moines
State Iowa

Providing comment on the following sections:

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

I am commenting on the policy considerations and strategy outlined in the Iowa Nutrient Reduction Strategy. I will begin with a brief description of my personal background.

I was born in Harrison County, grew up in Shelby County, was educated in Story and Johnson Counties, and have lived in central Iowa for most of the past 28 years. I am the descendant of farmers who emigrated to western Iowa in the latter half of the 19th Century and broke the prairie to grow crops and livestock. My grandfathers and my father were farmers. I still have uncles, aunts and cousins who run grain and livestock operations in western Iowa. As a child, I learned from my family about the efforts made during and after the Great Depression to terrace land and limit soil loss. As a university student and adult I have canoed rivers in central and northeast Iowa for recreation. As a parent and an adult scout leader I have taken children to Iowa parks, lakes and on Iowa rivers. I have had numerous opportunities to observe the conditions of Iowa waters, to explain to scouts and other children why lake beaches are closed due to high levels of fecal contamination and what precautions they should take to limit their exposure to infection and exposure to high levels of nitrogen, phosphorus, insecticide and herbicide runoff from farms.

I was an undergraduate university student when clean water standards were established by federal law more than 40 years ago. Since then, Iowa lakes and rivers have become increasingly contaminated by livestock waste, nitrogen and phosphorus runoff from farms, while many point sources of water pollution have been mitigated. In 2008 the EPA adopted the Gulf Hypoxia Action Plan. Each year since then the EPA has prepared annual operating plans identifying specific actions being taken by seven states in the Mississippi watershed, including Iowa, and federal agencies to implement the GHAP. For Iowa these actions included funding and implementation of watershed protection programs, the ISU Wetlands Nutrients and Water Management research initiative and agricultural producer education and outreach programs. In March 2011 the EPA recommended that states incorporate certain elements into statewide nutrient pollution management programs, including:

1. Development of programs to measure nitrogen and phosphorus pollution (N&P loads) contamination is all major Iowa watersheds, identifying major watersheds which collectively account for 80+ percent of the N&P loads delivered to the Mississippi watershed, and identifying priority sub-watersheds for N&P load reduction.

2. Establishing numerical goals for N&P load reduction goals based upon the best available physical, chemical, biological and treatment/control information from local, state and federal monitoring sources.

3. Ensuring effectiveness of point source permits.

4. Develop watershed-scale plans in agricultural areas to reduce N&P loads in partnership with Federal and State Agricultural partners, NGOs, private sector partners, landowners, and other stakeholders.

5. Identify how the State will use state, county and local government tools to assure N&P load reduction from communities not covered by municipal storm sewer systems.

6. Identify where and how each of the tools identified in sections 3, 4 and 5 will be used within targeted/priority sub-watersheds to assure reductions will occur; verify that load reduction practices are in place; establish baseline N&P loads in each targeted/priority sub-watershed, conduct ongoing sampling and analysis to provide regular seasonal measurement of N&P loads leaving the watershed, and monitor implementation of best management practices.

7. Annually report to the public on state websites the status of specific state programs and actions to reduce N&P loads in each targeted/priority sub-watershed, in an interactive process affording the public an opportunity for comment and feedback, for the purpose of improving implementation and collaboration to achieve N&P load reductions.

8. Develop a work plan and phased schedule for N&P criteria development for Iowa lakes and rivers containing interim milestones including, but not limited to, data collection and analysis, as well as N&P criteria proposal and adoption consistent with the Clean Water Act, for at least one class of Iowa waters within 3 - 5 years, and completion of criteria development in accordance with a "robust, state-specific workplan and phased schedule."

Name Kevin Kirlin
City West Des Moines
State Iowa

Providing comment on the following sections:

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

The proposed Iowa Nutrient Reduction Strategy is Iowa's response to the GHAP and EPA's March 2011 recommendations. Thus, the proposed strategy must be measured against the criteria set forth in those documents. Contrary to the claims set forth in the executive summary of the proposed strategy it is not a new beginning in the State's efforts to assess and reduce N&P loads in Iowa waters. Instead it summarizes the history of minimally funded state conservation programs, incorporates the ISU study of point and nonpoint pollution sources, followed by vague and conclusory responses to the March 2011 EPA recommendations.

The proposed strategy says the Iowa Water Resources Coordinating Council (WRCC) will prioritize watersheds on a statewide basis and determine watershed goals "based upon a set of mutually agreed-to indicators" such as "soil and water indicators, crop performance indicators, economic indicators and social/cultural indicators." No timeline is provided or even discussed. There is no analysis of, or even any reference to, the best available physical, chemical, biological and treatment/control information available from local, state and federal monitoring sources.

Regarding point source pollution, and relying upon the ISU study, the proposed strategy notes that modification of existing wastewater treatment facilities has the potential to reduce their nitrogen discharge by 66% and phosphorus discharge by 75% and that, if this effort were fully successful, it would reduce nitrogen loads in Iowa waters by 4% and phosphorus discharge in Iowa waters by 16%. There is no discussion whatsoever of how or when these goals would be reached. The proposed strategy summarizes existing state regulation of animal feedlots, but contains no account of the numerous breaches of animal waste treatment facilities or resulting pollution of Iowa waters, contains no analysis of the efficacy of existing regulations, nor any process or timetable for evaluating or modifying these regulations. The proposed strategy states that state agencies will work to develop an "environmental credit trading program" in response to nine-year-old federal legislation in effect for the last nine years calling for states to develop a market for water pollution reduction credits. Once again, no discussion of timetable or process.

Regarding non-point pollution sources, the proposed study states a numerical goal of 41% N load reduction and 29% P load reduction. Based upon the prior statement that the maximum potential point source N&P load reduction would reduce overall N&P loads in Iowa waters by 4 and 16% respectively, it appears that the proposed strategy, if fully successful, would result in overall N&P load reductions in Iowa waters of 45%, or less than half of existing N&P loads in Iowa waters. There is no discussion of any basis, medical, scientific or otherwise, for the N&P load reduction goals set for non-point pollution sources, or why non-point pollution source reduction goals should be far lower than point pollution source goals, or why the overall N&P load reduction goals should be less than half the existing N&P loads in Iowa waters. In contrast to the discussion of the cost of point source compliance, there is no analysis or estimates of the financial costs required for agricultural producers or the State required to achieve even the modest goal established for non-point sources.

Regarding so-called minor pollution sources, the proposed strategy notes that Iowa has more than 300,000 private sewage disposal systems. Beyond a summary of existing state and local regulation and funding, no goals, timetables or funding estimates are provided with regard to minor POTWs.

Regarding accountability and verification measures, the State proposes to convene technical work groups beginning in 2013 "to define the process for providing a regular nutrient load estimate...based upon the ambient water quality data network." The State proposes to develop new and expanded frameworks to track progress beyond the existing ambient water quality monitoring networks. The State proposes to "encourage" expansion of geographic coverage and frequency of statistical surveys regarding adoption of nutrient reduction practices by agricultural producers. The State will "seek to develop new frameworks...to characterize farmer and landowner adoption of new technologies and practices that reduce nutrient transport to water from nonpoint sources." The WRCC will establish and refine a "public-private reporting system that documents current nutrient management and conservation system application within watersheds." This prompts one to wonder what the WRCC has been doing in the more than four years since it was created with regard to any of these matters. Once again, no discussion of time tables or fiscal analysis; no specifics as to how the WRCC will accomplish these objectives.

Regarding annual reporting goals, the State proposes a new DNR inventory of management practices, and annual reports by WRCC. Once again, no fiscal analysis or specifics as to how the WRCC will accomplish these objectives.

Regarding development of a 3 - 5 year state-wide plan with detailed phases for data collection and analysis, development of N&P criteria, development of N&P load reduction proposals, and implementation consistent with the Clean Water Act, the State promises that the DNR will review ISU research results regarding protection of Iowa lake aquatics communities, and the DNR will evaluate a site-specific nutrient stressor-response approach for stream nutrient goals as part of its existing triennial water quality standards review process. The State throws in a flow chart describing that process. No fiscal analysis or timetable for interim goals or an overall plan is discussed.

In summary, the proposed nutrient reduction strategy is a collection of mostly vague aspirational goals without discussion of, or commitment

Name Kevin Kirlin
City West Des Moines
State Iowa

Providing comment on the following sections:

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

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to, any interim or overall detailed goals or timetables, lacking any technical or fiscal analysis regarding the implementation of any such strategy. Fiscal analysis of legislative bills in Iowa has been required for decades. Yet a document which purports to establish state-level policy on a highly complex issue such as water quality, which affects a public resource vital to our economy and our individual health and welfare, which requires the involvement of governmental agencies at multiple levels, private businesses, and public consumers over an extended period of time, lacks any such analysis.

We now know that the proposed strategy is the product of a process in which the Iowa DNR and Department of Agriculture outsourced the development of this policy to agricultural and commercial trade groups in violation of Iowa law regarding open records and agency action, while qualified public employees with technical expertise were deliberately kept out of the process. As a result of that process the proposed strategy represents the interests of those trade groups and not the interests of the overall public.

In light of the improper delegation of governmental functions to private trade groups, the lack of any meaningful technical or fiscal analysis by qualified and impartial persons or organizations, and the wholesale lack of responsiveness to the GHAP and the criteria set forth by the EPA in its March 2011 memo, I respectfully request that the agency set aside the proposed strategy and establish a task force including representatives of agricultural producers, private industry, local government, environmental organizations, individuals with scientific and technical expertise in wastewater treatment, soil nutrient treatment methods, with the goal of producing, within 12 months, a proposed nutrient reduction strategy for Iowa which is consistent with the Clean Water Act and responsive to the GHAP and EPA recommendations, and with adequate budget and staff to prepare fiscal and technical analyses necessary for the Iowa legislature and the public to evaluate the task force's recommendations in 2014.

Respectfully,

Kevin M. Kirlin

5104 Brookview Drive

West Des Moines, IA 50265

Email: kevin.kirlin@gmail.com

Timestamp 1/18/2013 2:37 PM

Name Brydon Kaster
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 you to support a science based nutrient reduction strategy for the state, that includes voluntary conservation practices and allows for farmers to maintain productivity. We need be sure that any program implemented is adequately funded as well as implemented in a timely manner. I think that these are resonable goals for this project. Brydon Kaster