

DALE STEVERMER

As changes are being made to the Nutrient Reduction Strategy, I need to add a couple comments. First, I understand the pressure and requirements you face, but please continue to keep some agronomic and business factors in mind.

I have been producing pigs on our home site for 37 years, and during that time have made a lot of adjustments to my method of raising pigs, and handling manure applications on crop land. I won't go into a detailed timeline of what I have done. I am incorporating the manure in the soil, currently with low-disturbance openers. I also utilize cover crops, no till and variable rate applications of seed and nutrients on what is now a corn-soybean rotation. I will mention that with the last 2 of the last 3 falls being dry, even rye that was drilled in the fall failed to germinate and provide the fall / winter nutrient protection I was looking for. I was fortunate that only a small percentage of the soil was exposed to erosion, but N and S were susceptible to leaching for those 6 months.

I also realize that University research into nutrient levels for crop production is evolving. Many of the N limits used are low according to my in-field research. For example, pre-sidedress nitrate testing, considered a best management practice statewide, showed that 90% of the N applied as manure the previous fall had leached away. Using small test plot data and variable rate application, I was able to see a yield and ROI increase due to a higher rate of N.

The other concern I have centers around changing the feedlot size for reporting at the state level versus local / county control. I am a one man show here, and I would probably bump just over the 600 au level, creating more costs and time to create reports, but not really have a fundamental improvement in how I am managing my manure and crop ground. I am concerned that such reporting may reduce the value of my site as I look to make management changes in the future.

Thanks for taking the time to review these comments.

Dale