

## Supplemental On-Site Status Review Comment and Response

Q: Back to the N timing BMP, why was that a zero when there was starter and sidedress and manure in the plan?

A: After this question was raised, it has come to our attention that a mistake was made when creating this form regarding the N Timing Supplemental BMP. Language for this form was taken from the 2020 PSU Farm Survey and that survey phrased that Nitrogen applied by crop in split applications must have an overall lower rate applied. This is not true. When reviewing the information from the [Quick Reference Guide for BMPs](#) (page 30-31) and the [NMP Expert Panel Report](#) (pages 14-19) it is clear that the N Timing BMP requires Nitrogen be applied in split applications and they do not have to result in a lower rate. This will be corrected along with the accompanying guidance when the NM/MM Administrative Manual is updated again. In the meantime, please know that split applications of nitrogen do not have to result in a lower rate of overall application in order for the N Timing Supplemental BMP to be credited. Please note, that this only applies for the N Timing Supplemental BMP. For N Rate, the lower rate split applications criteria is correct.

Q: When you are talking about capturing fields with setbacks, do we have to go field by field and only include fields that actually have setbacks? Or are we including all fields if he is following setback rules?

A: All fields that have nutrients mechanically applied to them.

Q: On placement, if no manure was applied to the field, but it had a starter that was injected, can that get credit for that?

A: Yes, that would satisfy the injection of inorganic fertilizer within 24 hours criteria. This can satisfy both the Nitrogen and Phosphorus Supplemental BMP if the starter fertilizer contained both N and P.

Q: Let me get this straight, if a split application is planned and shown in the NMP, we cannot figure that regarding rate applications for N and P?

A: If the split applications were made across the growing season resulting in lower than planned applications, then those acres can be credited to the N Rate Supplemental BMP.

Q: So, do you encourage planners not to 0 out the nitrogen balance so that the credit can be applied?

A: No, planners should still “zero” out the nitrogen balance when writing plans. This helps to show farmers the maximum amount of supplemental fertilizer that can be applied. Supplemental

credits are received when records are reviewed and show that not all planned supplemental fertilizer was applied.

Q: So, if we are sidedressing N, that counts for split applications?

A: Yes, as long as another application of N (manure or fertilizer) is applied during the growing season. This can count for the N Timing, as well as, the N Rate if lower than planned applications occurred.

Q: Would be easier to see if N application rates are lower than PSU recommended rates by looking at the supplemental N columns? whether supplemental N is called for?

A: That can be one place to look. The supplemental N columns will need to be considered when determining lower than PSU recommendations when the talking to the operator about their fertilizer applications. When looking for planned acreage, it seems to be easier to look at the N balance column, when looking for implemented acreage, it is easier to look at the N supplemental column.

Q: Could we have an example App 4 or NBS provided that would show a split application?

A: It is easier to find split application in the NBS Summary vs. Appendix 4. Everything highlighted with a red box would be examples of split application. The same field received 2 applications of manure, starter fertilizer, and supplemental fertilizer. Two or more separate manure applications, separate applications of manure and fertilizer, or two or more separate fertilizer applications would all qualify as split application.

CMU/Field ID	Acres	Crop	Manure Group	Application Season	Application Management	Planned Manure Rate <sup>1</sup>	Starter/Other Fertilizer (lb/A)			Supplemental Fertilizer (lb/A)			Nutrient Balance (lb/A) <sup>2</sup>		
							N	P <sub>2</sub> O <sub>5</sub>	K <sub>2</sub> O	N	P <sub>2</sub> O <sub>5</sub>	K <sub>2</sub> O	N	P <sub>2</sub> O <sub>5</sub>	K <sub>2</sub> O
A7	9	Corn for Grain (No-till)	Cow Fall	Early Fall	Early Fall: Summer utilization with cover crop used as green manure: Incorporated after 7 days or none	3500 gal/A	0	0	0						
A7	9	Corn for Grain (No-till)	Cow Spring	Spring	Spring: Spring or summer utilization-Incorporation after 7 days or none	4000 gal/A	10	5	0	166	0	0	0	-81	-131

Q: In slide 18 (P Placement), a farmer would be given credit for incorporating phosphorous in starter fertilizer when they've already applied a surplus of P in the final nutrient balance?

A: Yes, because that phosphorous would be applied according to the P-Index, so it meets Core P. The first criteria for Supplemental NM BMPs to be credited is that Core N and Core P must be met, then Supplemental NM BMPs can be credited. So even though a surplus of P may be applied, being that they meet the Core P criteria (running the P-Index), the Supplemental BMP can then be credited if it is met.

Q: To clarify that, acres can only be counted once for each rate, placement, timing category?

A: Correct, acres can only be counted once in each category, but those same acres can be used in multiple categories. For example, if 50 acres of corn had a starter fertilizer injected, as well as, followed the manure application setbacks, N Placement will only be 50 acres. However, those same 50 acres can be credited under N Rate if overall application rate was made at less than PSU recommendations.

Q: Our County has 75% total export plans, so in reporting it will look like I'm not filling these out, could there be a box to check so you know why I'm not filling out the supplemental form?

A: We will look into that but don't be overly concerned on tracking. An enhancement to the PracticeKeeper database is being discussed that would show NM Supplemental BMPs are not applicable.

Q: After we place all of this information into PracticeKeeper, how many years are the credits active in the Model? The 3 years of a NMP planned or just 1 year that is confirmed? How many years if we fill this out for a Manure Management Plan?

A: The life span of the NMP, but yearly verification (during yearly status reviews) is of upmost importance to the Bay partners. These are annual practices and will be pulled directly from the data entered at the time of the status review for Act 38 Operations. MMPs will be handled a bit differently. The county level MMP implementation rate derived from the year's CBAIP inspections will be applied to the MMP Supplemental BMP data entered on the supplemental BMP tab to determine the acres of each supplemental NM BMPs that will be reported for the county from MMPs in a given year.

Q: If the operator answers positively to any of the supplemental NM questions, but the App 4 doesn't reflect it, is there a process to have the plan writer change the App 4?

A: No need to have the NMP updated, as these BMPs are above and beyond what is required by Act-38. This is merely to get additional credits in the bay model and inform PA decisions across the state on such things as 4Rs.

Q: So if they're following manure application setbacks but still applying fertilizer within the setbacks, they get credit?

A: No N or P should be placed in a setback from surface water. If there are any nutrients applied within a setback (N or P) regardless of the source (manure or fertilizer) it would not qualify for credit. The Final BMP Panel Report for Nutrient Management Practices that was adopted by the Agriculture Workgroup for the Chesapeake Bay Program states that there must be a nutrient application setback from all surface water bodies and that the setback should meet, at minimum,

all applicable local, state, and federal programs and laws. It is recommended that inorganic fertilizers follow the same setbacks as manure application.

Q: So only credit is given for those plans that have a status review? The planned information does not get credit?

A: Correct, the information needs verified to be counted, so needs to be recorded during a status review

Q: So if a guy has 4 application of manure to a field "so he has options" but he is only going to apply manure once/year, then we need to go into app 4 on all those fields and tease out whether one application is below any of the LGU recommendations and he might get credit for doing so?

A: Due to NMPs allowing for over-allocation of manure, trying to determine the planned acreage can be challenging. Due to this, it is important to make sure a thorough review of records and a thorough questioning of the operator occur during the status review to determine if application occurred below PSU recommendations.

Q: In your beta testing and ground truthing of the Supplemental Information review, what additional time is added to the interview/inspection? Just looking for an estimated time commitment that will be required on the farmers part.

A: The farmer's time commitment is minimal. At most, field testing required an addition 10-15 minutes of the farmer's time. That included explaining why this information was being collected. Some of this information is captured during the normal status review procedure.

Q: What size is the farm that the 10–15-minute time guesstimate originates from?

A: The field testing occurred on farms anywhere from 3 acres of pasture all the way to about 2,500 acres of cropland. The 2,500 acres of cropland fits into that estimate of time. Some of the Supplemental BMP information can be derived from questions asked in the standard Status Review.

Q: Were you basing the fertilizer answers on viewing records, or just based on the farmer's answers?

A: Both are acceptable. Fertilizer records should be reviewed if available.

Q: Are we supposed to start doing this immediately or at a later time?

A: Completing the Supplemental SR Report should be started immediately

Q: What is the direct benefit to the farmer getting bay credits? They often ask this

A: There is no specific direct benefit to the individual farm. We are largely collecting information on practices that the farmer is already doing. Where the benefit comes into play is that the additional data and credits show that PA Agriculture is “stepping up to the plate” and improving water quality. If we don’t take credit for the work we are already doing, we will be asked to do more than we would perhaps need to do to implement our WIP. If PA cannot demonstrate improvements in water quality, there is always the possibility of additional federal or state laws and regulations that may not be favorable to agriculture.

Q: How/when does the supplemental review letter that was shown at the admin meeting come into play?

A: There is no letter that accompanies this Supplemental SR report. This should be included with the regular SR report and included as an attachment to the appropriate standard letter that is being sent as follow-up to the on-site review.

Q: Is the supplemental form a required portion of the status reviews?

A: Yes

Q: So the planned acreage and information gets entered into the "supplemental NM BMPs" tab in the NM instance, and the implemented acreage gets entered in the status review entry?

A: Correct.

Q: When we do a status review of a CAFO, do we send a copy of the supplemental status review report, along with the regular status review report, do we need to send to DEP.

A: You are not required to send the supplemental status review report to DEP.