Nutrient Management Planning

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commitment to the implementation of best management practices (BMPs) on the farm through their original N-based plan and their conservation plan.

To date, Brubaker farms has an estimated 17 BMPs to help manage their nutrients, from addressing rainwater in the barnyards, to provide better field management, and to improve manure handling.

However, Brubaker said a farm that is just beginning a conservation program "might have to do a lot more work if starting from square one."

Seibert also notes that the Pbased plan will change the focus on BMPs from the obvious problems that are addressed in a Nbased plan to include the more subtle problems causing soil erosion.

In the mechanics of writing a nutrient management plan, a plan writer will evaluate a field using the P-Index to appraise the phosphorus pollution risk.

Based on thresholds, if the index rating is low to medium, a farmer can continue to apply manure to meet the nitrogen requirement of a field.

If a high index is calculated, a farmer is limited to spreading manure to only meet the phosphorus requirement of a field.

If it is very high, a farmer will be restricted from the application of any manure on a field.

In high and very high indexing fields, farms will have to meet nitrogen requirements with commercial nitrogen fertilizers instead of manure.

As Pennsylvania moves to Pbased plans, Seibert expressed concerns on the P-Index in pastures.

"Smaller farms who pasture their livestock may become a problem. There are some pastures that I have seen on plans already where you cannot apply any more phosphorus as the plan reads. Therefore they have to abandon their pastures," said Seibert.

Seibert stresses that for farms that are forced to abandon pastures until the phosphorus is reduced could seek alternatives, such as new pasturelands or moving to total confinement. These changes could impact the management of livestock, manure storage, and facilities.

Seibert said that pastures might be an area that may need to be revisited with the Act 6 to ease the potential economic stress, balancing it with environmental needs without totally abandoning pasturelands.

The Brubaker farm only utilizes pastures for their heifers. with their milking cows held in

confinement. Although the pas-

ture management has been able

to remain the same, their han-

dling of crop fields near water-

our soil tests closer to the

stream," said Brubaker. "We

might have to manage the 150

"We have to be more aware of

ways has not.

feet to the stream differently, then back from that stream, with more record keeping and understanding of the P-based plan how it works - and to know how to apply manure."

Brubaker also holds firmly to the belief that farmers want to be good stewards and adapt to the new standards.

"Farmers will want to try and do their best to meet the plan," said Brubaker, "But it might be difficult in some situations."

For Brubaker, he is a firm believer in building his farm for the future, noting the need to be sensitive to community needs, keep the farm economically sound and environmentally friendly.

But, it is economics that have slowed the Brubaker farm to the implementation of several new best management practices on his farm such as a methane digester, a manure solids separator, and a manure storage facility. Brubaker has filed for grants to help reduce

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Kevin Seibert

the costs for these new practices; however, moving to a final stage is economically driven.

"When the milk price is low, it's going to impact dairy farmers very much. Because if they do not get any help from NRCS to build a pit or to do conservation practices, they are going to say, 'I can't do it."

Under the P-based plan, Brubaker continually stresses management. If the farm was unable to use all of their manure and would have to move to exporting, it could cause a monetary loss to the farm and "put them at the mercy of other landowners" to take the manure.

"In our case, if we could not manage the plan properly to use our liquid manure, that would be devastating to our operation," said Brubaker. "We might not have anywhere to go with it."

Another cost to the farm besides manure exporting would be the use of commercial fertilizers to meet crop needs instead of using manure to meet nitrogen needs in fields where there was a phosphorus application limit.

Goodlander said that the commission is working on identifying areas that could be most prone to high phosphorus index and help to identify alternative methods for addressing high P-Index concerns.

"The commission does feel they have a role to play to help for farmers through the process. Because as we revise our regulations to require this second look at phosphorus, we also need to help farmers to address that," said Goodlander.

The cost of P-based planning is not just limited to the costs for the implementation of a plan, but also the time and effort that will have to be taken to write and review a P-based nutrient management plan.

To help farmers defray the costs of revising a nutrient management plan to include the P-Index, the Pennsylvania Department of Agriculture's (PDA) Plan **Development Incentives Program** (PDIP) is adding a section to allow for cost sharing the cost of one plan revision and soil testing.

For Seibert, the P-based plans in Lancaster County accounted for only one percent of reviews

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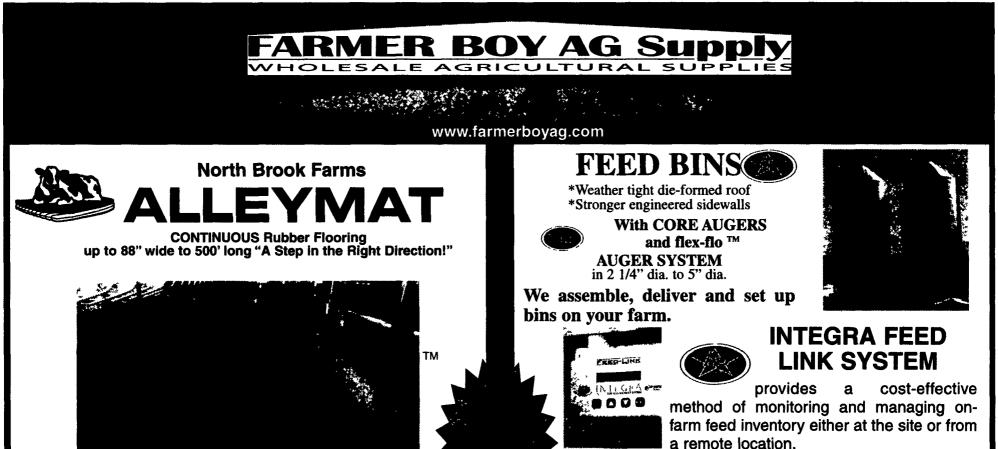
Luke Brubaker

completed so far this year; however, the time needed to properly review the plans were 2-3 times longer in comparison to an Nbased plan. In conservation districts with a high number of nutrient management plans, this will create an added workload.

To do an effective job at the review process, Seibert stresses the district will have to consider adding onto his staff to do everything correctly or something may be missed.

As the commission moves forward on preparing their revisions for public comment, the P Index and other changes will be up for evaluation by the farming community and public.

"It new world of nutrient management, it's more detailed," said Goodlander in regards to the use of the P-Index and Act 6 changes. "Look at the world of agriculture and the world of people looking at agriculture. As the world moves on, agriculture is going to be more challenged to document that they are doing things well. The nutrient management act provides them the opportunity to document that they are doing things well."



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