



National Milk Producers Federation

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Agri-Mark, Inc.
Associated Milk Producers Inc.
Bongards' Creameries
California Dairies, Inc.
Cooperative Milk Producers Association
Dairy Farmers of America, Inc.
Ellsworth Cooperative Creamery
FarmFirst Dairy Cooperative
First District Assoc.
Foremost Farms USA
Land O'Lakes, Inc.
Lone Star Milk Producers
Maryland & Virginia Milk Producers Cooperative Association
Michigan Milk Producers Association
Mid-West Dairymen's Company
Mount Joy Farmers Cooperative Association
Northwest Dairy Assoc.
Oneida-Madison Milk Producers Cooperative Association
Prairie Farms Dairy, Inc.
Premier Milk Inc.
Scioto Cooperative Milk Producers' Association
Select Milk Producers, Inc.
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St. Albans Cooperative Creamery, Inc.
Tillamook County Creamery Association
United Dairymen of Arizona
Upstate Niagara Cooperative, Inc.

January 10, 2020

Submitted via regulations.gov

Matthew Lohr
Chief
Natural Resources Conservation Service
U.S. Department of Agriculture
1400 Independence Ave., SW, Room 5105-A
Washington, DC 20250

RE: Interim Final Rule for the Conservation Stewardship Program, Docket Number NRCS-2019-0020-0002

Dear Chief Lohr:

Thank you for the opportunity to provide comments on the Interim Final Rule for the Conservation Stewardship Program (CSP), Docket Number: NRCS-2019-0020-0002. The National Milk Producers Federation (NMPF), established in 1916 and based in Arlington, VA, develops and carries out policies that advance the well-being of dairy producers and the cooperatives they own. The members of NMPF's cooperatives produce two-thirds of the U.S. milk supply, making NMPF the voice of dairy producers on Capitol Hill and with government agencies like USDA and EPA. NMPF provides a forum through which dairy farmers and their cooperatives formulate policy on national issues that affect milk production and marketing.

Dairy producers utilize USDA voluntary conservation programs to develop and implement conservation and nutrient management plans, construct structures to improve air and water quality, adopt practices to enhance soil health and habitat, and manage operations to enhance environmental outcomes and animal health. Participation in conservation programs and adoption of new conservation practices and structures must be balanced with the economic viability of each dairy producer's operation. The financial and technical assistance USDA provides is instrumental in a dairy producer's ability to plan, design, install, and maintain conservation practices.

Voluntary conservation programs like CSP are also well-positioned to play an important role in the dairy industry's increasing sustainability efforts. The dairy industry has launched a Net Zero Initiative to reduce the industry's climate impact to 'net zero' by as early as 2050 and minimize the water quality impacts of dairy farming. As part of the groundwork needed to launch this initiative, the dairy industry has worked to develop scientific and economic models to quantify the economic and environmental benefits associated with certain dairy farm technologies and practices, and various technologies have been catalogued and evaluated based on their effectiveness, resilience, and business prospects. The Net Zero Initiative will deploy several demonstration farms around the

country to explore the impact of various technologies and management practices that can aid in reducing dairy's carbon footprint and water quality impact. This effort should help to identify which technologies and practices work well for different types of operations, which will help inform policy discussions regarding the best ways to expand their adoption in pursuit of reducing dairy's environmental impact. Each dairy operation will contribute to meeting the 2050 goal in their own unique way and NRCS programs provide financial and technical assistance to producers to undertake new conservation practices that reduce greenhouse gas emissions.

Dairy producers have a history of utilizing conservation programs, including CSP, despite the outdated statutory restriction related to animal waste storage or treatment facilities and waste transport or transfer devices for animal feeding operations. Several state NRCS offices are reaching more dairy producers through CSP -- Wisconsin, New York, Pennsylvania and Minnesota totaled the highest dairy participation from 2014-2016. An analysis of dairy producers' use of CSP in 2014-2016 identified the top CSP enhancements used by dairy producers as: AIR04: use of drift reducing nozzle, low pressure, lower boom height and adjuvants to reduce pesticide drift; AIR07: GPS, targeted spray application (Smart Sprayer) or other chemical application electronic control technology; AIR08/09: nitrification inhibitors or urease inhibitors; SQL04: use of cover crop mixes; WQL03: rotation of supplemental and feeding areas; WQL04: plant tissue testing and analysis to improve nitrogen management and WQL07: split nitrogen application 50 percent after crop/pasture emergence. This indicates the majority of dairy operations are using CSP on associated cropland.

However, we believe that the program holds expanded potential for dairy farmers in the areas of nutrient, feed, and silage management. The 2014-2016 data review also identified the top nutrient management related enhancements based on acres treated:

- WQL05: apply nutrients no more than 30 days prior to planned planting date
- ENR10: using N provided by legumes, animal manure and compost to supply 90-100% of the nitrogen needs
- SQL15: utilize the soil health nutrient tool to assess soil nutrient pools
- WQL10: plant an annual grass-type cover crop that will scavenge residual N
- SQL04: cover crops
- WQL25: split application of nitrogen based on PSNT
- WQL07: split nitrogen applications 50% after the emergence green up
- WQL04: plant tissue testing and analysis to improve nitrogen
- WQL11: precision application technology to apply nutrients
- WQL26: reduce the concentration of nutrient imported on farm
- WQL31: land application of treated manure
- AIR08/9: nitrification inhibitors or urease inhibitors

In 2016, NRCS modified the CSP enhancements offered and as a result, NRCS now unfortunately offers fewer enhancements related to nutrient management and overall

fewer options for livestock and dairy operations. NRCS must work to improve the options available for livestock operations, specifically in the area of nutrient management. In this context, it is also essential that CSP offer workable enhancements for dairy farms of all sizes. New technology and innovation in manure, feed and silage management offer increasingly effective approaches to improve air quality, water quality and soil health all within the statutory authority of CSP. NMPF is pleased to offer recommendations for areas of focus that would enhance options for dairy producers in CSP and other NRCS conservation programs.

Dairy producers are interested in new approaches to feed management that can reduce enteric emissions and subsequently reduce greenhouse gas emissions from dairy production. Elements of the 592 practice standard on feed management, such as routine feed analysis, should be included in a CSP enhancement. New feed amendments that reduce greenhouse gas emissions should also be included, allowed, and funded in a CSP enhancement. Routine milk analysis, such as milk urea nitrogen, can be used to refine dairy cow diets reducing ammonia volatilization and overall nitrogen from animal waste, and should also be included, allowed, and funded in a CSP enhancement.

Advanced nutrient management enhancements that focus on the implementation of nutrient management plans include soil testing, stalk testing, equipment calibration and related activities. Additionally, manure analysis could be included in a CSP enhancement.

Appropriate silage management practices could also be included to improve both air and water quality. CSP enhancements for silage management could provide benefits for reducing greenhouse gas emissions and improving water quality from proper storage and management practices. NRCS may consider a new practice standard for silage management to guide practice/enhancement adoption.

Soil health enhancements should be expanded to include the benefits of the use of manure. In 2019, NRCS did not offer enhancements related to soil health and nutrient management or manure management. Appropriate application of manure improves soil organic matter, reduces N₂O emissions and should be added to CSP enhancements. This presents an opportunity to more actively engage modern livestock farmers in appropriate nutrient management, manure management, and soil health.

NRCS should also include practices focused on water recycling and recycling of liquid waste. Dairy producers are looking for opportunities to improve water use, making the most of the water by recycling water several times throughout the dairy barn, installing well meters, and finally as irrigation water. NRCS should help producers to innovate and improve upon water use and recycling at dairy operations.

Further, cover crop adoption is increasing and the use of cover crops in livestock and dairy feed production is a potential area for additional NRCS outreach. NRCS should also align cover crop practices and conservation crop rotations with grazing management to

allow covers to be appropriately grazed consistent with practice standard 328 conservation crop rotation. This simple measure could greatly increase the use of cover crops following silage crops on many livestock operations.

Additionally, dairy management bundles for water quality, air quality, and water conservation could be offered to include several of the enhancements. For example, a water quality bundle could include feed management and/or silage management, advanced nutrient management, management of cover crops, field border, or drainage water management. A bundle for air quality could include feed management and/or silage management, feed amendments to reduce emissions, energy conservation, advanced nutrient management, and a field border. A bundle for water conservation could include water recycling on dairy operations and irrigation efficiency.

In several existing enhancements, modifications can be made to acknowledge new technology. NRCS should explore adding the use of enhanced nutrient recovery technology prior to precision application of nutrients. Energy use enhancements that address switching fuel sources should permit the use of biogas as a renewable fuel source. Animal wastes and compost should be considered for residue and mulch to increase plant available moisture.

The technology and innovation of agriculture, and specifically dairy production, is changing rapidly. We urge NRCS to work with the dairy industry to embrace new technology and innovation in conservation cost-share programs. U.S. dairy producers are looking to be global leaders who are economically viable and environmentally sustainable while providing the highest-quality animal care. Undertaking these efforts requires technical and financial assistance, and we appreciate the role NRCS plays in working with dairy producers. We encourage NRCS to maintain a strong working relationship with dairy producers in all states and help us reach our goals of providing high quality products in an environmentally sustainable manner.

Thank you for the opportunity to provide comments on the interim final rule for the Conservation Stewardship Program. We look forward to working with you on this and other conservation efforts.

Sincerely,

A handwritten signature in black ink, appearing to read "Clay Detlefsen". The signature is stylized and cursive.

Clay Detlefsen, Esq.
Senior Vice President and Staff Counsel