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Department of Agriculture, NRCS
1400 Independence Avenue, SW., Room 6136 South Building
Washington, DC 20250

RE: **590 Nutrient Management Standard**

We appreciate the opportunity to comment on proposed changes to the Nutrient Management Standard (“Standard”). Western AgCredit, as part of the Farm Credit System, is the largest agricultural lender in the State of Utah. In this role, we are in a unique position to understand the various economic factors impacting the dairy, beef and poultry industries in the West. We are very concerned that some of the proposed changes to the Standard would create significant financial burdens on livestock and poultry operations in Utah and the Inter-mountain Area that could jeopardize the viability of the individual operations and the related industries.

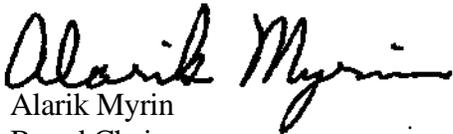
In recent years, we have witnessed significant investments in waste management infrastructure and improvements in manure management practices. The manure management plans that have been developed and implemented have been based on suggestions and requirements from both State and Federal regulatory agencies. Although the projects have been very costly, most plans have been based on the local climate, soil conditions and the environmental risks of the individual operations. Implementation of the proposed changes in the Standard would appear to ignore the vast differences in climate and soil conditions throughout the United States and negate much of the progress that has been made to develop cooperative solutions.

Of specific concern are proposed restrictions on when nutrients may be surface applied, without giving consideration to the actual risks of the nutrients leaving the field. For example, in the arid West, application of manure to a level field that is frozen, snow covered, or in a period of winter dormancy does not appear to have the same risks as using those practices in a region that receives much higher amounts of moisture or where fields have a higher risk of runoff as the snow thaws. With the climate conditions and growing seasons in the Inter-mountain area, the proposed Standard would only allow nutrient application during a very short window each year. This would require livestock and poultry operations to store much larger volumes of manure for longer periods. The cost of potentially tripling manure storage capacity would be financially devastating for many operations. In addition, it would appear that tripling the amount of manure in storage would present more of an environmental risk than the current process of spreading the nutrients over fields that have a low risk of the nutrients leaving the field.

The other major concern relates to the potential consequences from the provision requiring treatment measures to address the movement of manure and nutrients to subsurface drainage tile. Conservation Districts have been working with the Utah Division of Water Quality to monitor field drain water quality. Management of water quality from field drains can be best handled on a local level. While we understand the importance of addressing nutrient management in surface and subsurface drainage, we are concerned about the implementation of general requirements that do not provide flexibility to adjust for local conditions which could result in serious unintended consequences. For example, stopping the flow of drainage water in Box Elder County, Utah would likely cause 1) fields to be saturated, 2) basements to flood, and 3) reduce the flow of much needed water to the Bear River National Wildlife Refuge.

Water quality and appropriate nutrient management are critical to agriculture, other businesses and the citizens of Utah. We feel that much progress has been made in this area over recent years as agricultural producers and the Utah Department of Water Quality have worked in cooperation with an incentive-based approach. We encourage you to avoid adopting a Standard that could negate the benefits of this cooperative approach or that would remove flexibility to develop plans based on local climatic conditions, an individual farm's risk of storing or applying nutrients, and local water quality issues.

Sincerely,


Alarik Myrin
Board Chairman


Richard Weathered
President & CEO