CNMP and the Planning Process Webinar, January 26, 2016
Questions and Answers

1. Q: Will the MMP template be updated for the new CNMP format?
A: Yes, there is currently an effort underway to update the Manure Management Planner (MMP) software to meet the new CNMP format. Implementation of the updated software is not yet known. Work is also being done to create a WORD template to help meet the need in the interim.

2. Q: Where do you get NAQSAT?
A: NAQSAT is a completely online tool, so there is nothing to download. The NAQSAT website is found at http://naqsat.tamu.edu. Additional information about NAQSAT can be found in NRCS National Instruction 190_309, dated July 2015.

3. Q: As for the Inventory and Evaluation (I&E) by TSPs, it is critical that we get some idea of what options were discussed. Many owners want this to understand why something was selected.
A: Agreed. I&E must be deemed meaningful and useful to the client and can be included by the planner. The format content we are discussing today is the minimum requirement set by national policy.

4. Q: Is the CPA-52 going to be done by TSP or NRCS?
A: According to NRCS policy, NRCS will complete the CPA-52 for CNMPs.

5. Q: Going back to Policy changes, Can a State Conservationist waive CNMP for small operations, say 100 AEUS or less?
Q: The small farm exemption was removed from the CNMP policy and can no longer be used.

6. Q: Slide 11 shows the Engineering Plans included in Section 2 whereas slide 30 indicates the engineering plans are NOT typically included with the CNMP (as they are usually developed after completion of the CNMP). Would it be possible to clarify this? Thanks
A: Engineering plans for planned practices are not required as part of the CNMP, however if engineering plans already exist, then the CNMP should reference those. In either case, they would not be part of the CNMP provided to the landowner. Engineering designs and existing engineering design (if available) should be placed in the case file.

7. Q: There used to be a National Instruction on e-directives for Nutrient management policy implementation. It is no longer on e-directives. Anyone know why?
A: It was retired with the adoption of new CNMP policy released in 2015.

8. Q: Why list Forest / range and pasture? Only for where manure/wastes are mechanically applied?
A: Cropland may be one of the common land types on which animal manures are applied, but in some parts of the country manures are land applied to other land types.

9. Q: So, the key is to apply nutrients at agronomic rates to reduce excesses that can be lost to streams and groundwater?
A: For most situations that is correct. Exceptions from this could result from the risk assessments. For example, a high phosphorus index value may result in reduced phosphorus rates or a drawdown strategy (no additional phosphorus applied).

10. Q: Does AWM now print reports?
A: Cherie Lafleur, NRCS Central Environmental Engineer, provided the following workaround for installing and printing with AWM (Cherie.Lafleur@ftw.usda.gov).
Here is a brief workaround for those of us using Windows 8.1 for installing AWM Version 2.4:

The file MSCOMCTL.OCX must be located in the C:\Windows\SysWOW64 file. At least it was on my machine running Windows 8.1 and Office 2013.
The file must be registered. To do that we go to the Command Prompt Icon, and using the right click, chose Run as Administrator. This step is essential!
Next, at the Command Prompt, type cd (space bar) c:\windows\SysWOW64 Press Enter
Next, type regsvr32 (space bar) mscomctl.ocx Press Enter
The file will be registered.
AWM should now open and also the Access data will enable preview and printing of reports (yea!!)
I downloaded Version 2.4 directly on the C Drive this way: C:\USDA
The download page (NRCS) already tells us to do this on external machines like mine. Worked fine.

11. Q: If CAFO is "concentrated...", but we say confined here (Richard), what's the difference?
A: The acronym CAFO stands for Concentrated Animal Feeding Operation. Part of the definition for an animal feeding operation (AFO) has to do with the length of time that the animals are confined.

12. Q: Will we expect TSP to do the NAQSAT for operations over 300, starting for CNMP contracted in 2016?
A: Anyone developing a CNMP for livestock operations overs 300 animal units is to use NAQSAT beginning with contracts in 2016, per NRCS National Instruction 190_309.. This would also include Technical Service Providers (TSP). Some webinars posted on the Science and Technology webinar page have been developed on the use of NAQSAT. Question 2 provides the link to NAQSAT.

13. Q: So, we need to help the landowner manage the land within resource constraints?
A: That is correct. When developing a CNMP the minimum resource concerns to be addressed include: soil erosion, water quality and air quality.

14. Q: Is a PLU one field?
A: Sometimes, a PLU (planning land unit) is defined as a unique geographic area, defined by a polygon, which has common land use and is owned, operated, or managed by the same client(s). The PLU is the minimum unit for planning. In the case of nutrient management planning, especially where animal waste is involved the planning land unit may be smaller than a field (such when waste is being applied to a part of a field with a solid set irrigation system; each section of the field may need to be a PLU).

15. Q: Explain the importance of documenting baseline conditions on the landowner's property?
A: Establishing the baseline conditions for the operation assists with planning what conservation practices may be needed to address any existing resource concerns. It provides the landowner information to help make the necessary decisions that are included within the CNMP. The baseline conditions may also be used to determine how effective applied practices have been in addressing resource concerns.

16. Q: What is the threshold on the new air quality tool that requires a practice to be implemented to solve the identified resource concern (the planning criteria)?
A: The NRCS air quality planning criteria have not changed. The NAQSAT scores should be used to help identify areas where changes could be made and the potential actions that could be taken to have a positive impact on the score. It is still up to the planner to identify whether there is a resource concern (regardless of the score) and which practice(s) should be implemented, if any, to increase a particular score. The NAQSAT webinars on the Science and Technology webinar page help to identify which particular score bars to focus on, and the general rule of thumb is that no changes would be necessarily recommended if the those priority score bars are at least 50% green. Having a score lower than 50% green in one of the priority score bars does not necessarily mean that there is a

resource concern or that a practice needs to be applied, since that decision must take into account all other available information about the operation and the producer's objectives.

17. Q: Must all resource concerns be addressed?
A: For CNMPs, the only resource concerns that must be addressed are soil erosion, water quality and air quality.

18. Q: I noticed the reference to 7 CFR 1466.7 states the CNMP must be developed by the end of the contract period. Wouldn't it seem logical to require the CNMP be developed prior to developing a contract?
A: Yes, you are correct. The reference to that regulation was to highlight the CNMP must be implemented by the end of the contract period.

19. Q: How can NRCS enforce the completion of practices in CNMP that are not in an NRCS contract?
A: There should not be any practices in the record of decisions that are not NRCS practices. Even if a practice will not receive a financial assistance program payment, it should still be listed in the CNMP specifically showing the implementation date. If a practice is not implemented, there are a couple of things that can be done. First, previous payments from the contract could be requested to be returned. Second, future rankings could be impacted for previous contracts that were not completed. Possible actions should be discussed with your Programs Manager.

20. Q: Could the toolkit conservation plan printout be used for the record of decisions?
A: Yes, for NRCS developed CNMPs, using the printout from Customer Service Toolkit is encouraged. Since a CNMP is a "component" conservation plan, the output from Toolkit would meet the requirements for the record of decisions.

21. Q: Do all practices included in the CNMP have to meet NRCS standards and specs regardless of whether they are cost shared or not?
A: All practices shown in the record of decisions are NRCS standards. Therefore, the practices would need to be meet our standard requirements whether a practice is cost-shared or not.

22. Q: RUSLE2 is good for sheet and rill, but does not address gully. Planners need to walk the farm to determine if there is a need for waterways, terraces, etc.
A: Correct! Planners need to evaluate all types of soil erosion, including gully erosion and when applicable wind erosion in the field. Assessment tools are a great resource and must be populated with field collected data.

23. Q: If NAQSAT tool shows concern for odor (for example) must the CNMP have practices to mitigate that concern?
A: Not necessarily. As mentioned in the answer to question 16, the decision as to whether an air quality resource concern exists and whether a practice needs to be applied is still up to the planner and should include consideration of all other available information about the operation and the producer's objectives. NAQSAT is simply a tool that can help identify potential resource concerns and mitigation opportunities, but it by itself does not provide the final determination.

24. Q: Is NAQSAT assessment required in the land treatment section?
A: Just as a CNMP looks at the whole operation from nutrient input to use, NAQSAT should be used in a similar manner.

25. Q: What is the acceptable "T" level for CNMP's?
A: Our soil erosion conservation planning criteria for any type of conservation plan is less than or

equal to the soil loss tolerance (T). Soil erosion (water and wind; sheet and rill and gully) must be managed to protect soil and water quality. Where soil erosion is greater than T, a site assessment for nutrient and soil loss must be conducted to determine if mitigation practices are required to protect water quality. Exception available at the discretion of the NRCS State Conservationist when soil T values are less than 5 tons per acre per year (See guidance in GM 190 Part 405-CNMP Policy).

26. Q: Do Job Sheets substitute for Implementation Requirements?
A: Job sheets are now called Implementation Requirements.

27. Q: This is all listed in the NPPH?
A: Since a CNMP is a “component” conservation plan, the format and content should follow that outlined in the National Planning Procedures Handbook (NPPH).

28. Q: Can you clarify when a CNMP is needed in relation to an EQIP contract, is a CNMP required prior to getting into an EQIP contract OR can it be developed in conjunction with the EQIP contract as long as it is completed prior to the end of the contract period ?
A: Normally the CNMP is developed prior to the EQIP contract. In this case, since all of the practices are listed in the record of decisions, they could all be included in the contract up front without modifications. According to “PROGRAMS” states can obligate a contract for animal waste practices prior to the completion of a CNMP, but the CNMP must be completed prior to the installation of any conservation practices.

29. Q: If a grassed waterway is needed, it would be planned and scheduled in the CNMP but not design just like a waste storage facility is needed, included but no design, correct?
A: That is correct.

30. Q: Would a grazing plan be required in the CNMP under the land treatment?
A: This is another of those questions that the answer is “it depends”. The first thing that I would want to confirm is that the livestock operation is an animal feeding operation (AFO). If it is not an AFO, then a CNMP is not required. If the operation is an AFO, then prescribed grazing would likely be listed as one of the records of decision in the CNMP.

31. Q: What do we do in situations where a planner has decided that a required practice needs to be implemented, but the client doesn't want to implement the practice? Does this result in an incomplete CNMP where the client doesn't sign?
A: Communication is so important when developing any type of conservation plan. The decisions on record in a CNMP must be those of the landowner. For a CNMP, the resource concerns, soil erosion, water quality and air quality must be addressed. Using the nine steps of planning, several alternatives may need to be presented to the landowner. If after all of the alternatives and options are exhausted, the final decision may be that a CNMP cannot be developed. Without a signed CNMP (by the landowner), a contract cannot be developed to implement any of the planned practices.

32. Q: Where does the Nitrogen Leaching index come from? How do I find it?
A: Soil map unit leaching index information and values may be found in Section 2 of the Field Office Technical Guide (FOTG) for your respective state. Soil map unit leaching index values are also available in RUSLE2. The NRCS State Agronomist for each state should be able to provide the local information.

33. Q: Who do I contact for the State Phosphorus Index?
A: The NRCS State Agronomist for each state should be able to provide the local information.

34. Q: Are there sample spread sheets that are being shown on the slides?
A: Yes, the sample plan and templates that were used during the webinar are available. Many of the forms shown in the presentation are Implementation Requirements (IR). The national IRs can be found on the national conservation practice website:
http://www.nrcs.usda.gov/wps/portal/nrcs/detailfull/national/technical/cp/ncps/?cid=nrcs143_026849.
You may need to check with your state of interest in case the IRs vary from the nationals. One can also find blank data collection form in Manure Management Planner which might be helpful.

35. Q: Does the plan need to include documentation on the basis for the realistic yield goals and target manure/fertilization rates?
A: The supporting documentation used to determine realistic yield goals should be kept in the field office case file. The information would not be a part of the CNMP documenting the decisions made by the landowner. One of the biggest complaints received about CNMP is the size of the document and supporting documents should not be part of the CNMP.
36. Q: Where can we find these nutrient management spreadsheet templates?
A: See response to question 34.

37. Q: In many cases, items such as the design/as built information on manure and wastewater handling structures is 'existing' in the case file for the AFO. How will existing documentation, including this and land application area practices (ie 328, 340, 329, 528, etc.) be documented in the new format?
A: Existing engineering practices where on the farmstead or land application area should be shown on a plan map. They should be evaluated for structural integrity and determine if they meet NRCS practice standards especially those not designed by NRCS. The evaluation documentation should be included in the case file. Existing agronomic practices should be evaluated and documented in the case file.

38. Q: Where do resource concerns go in the plan?
A: For CNMPs, resource concerns should be determine by NRCS through the CPA-52 process. The minimum resource concerns to be addressed include soil erosion, water quality and air quality. The resource concerns to be addressed in the CNMP can be outlined in the AFO description narrative.

39. Q: Why is there not a Balance After Removal for N? Will this be included in the updated MMP template?
A: The “Nutrient Balance after Removal” columns for P and K are provided to show “Nutrients Applied” minus the amount removed by harvested portion of the crop through the indicated year. Positive balances are carried forward to subsequent years. This is helpful, as it is common for farms to apply P and K once for a crop rotation. Negative balances typically indicate a successful drawdown strategy for one or both of the nutrients. For nitrogen the balance after recommendations and the balance after removal would be the same. Carryover or deficits of nitrogen are very dynamic and vary considerably from year to year due to climate.

40. Q: What about cover crop residuals? Is there a good tool for calculating N left over from cover crops?
A: When developing a nutrient management plan, nitrogen from cover crops should be considered and accounted for in the plan. Predicting plant available nitrogen from cover crop residue can be difficult. There are regionally specific tools and guidance available, so I encourage you to reach out to your NRCS State Agronomist or Land Grant University to assist with accounting for these nutrients.

41. Q: If the details for the NMP are not followed, is this a violation of the CNMP and therefore a violation of Federal law in the same way a planned practice not implemented would be?
A: The nutrient management plan should follow the criteria outlined in the Nutrient Management (590)

practice standard. Over application of nutrients could cause nutrient leaching and/or runoff which can be serious environmental concerns. Federal, state and local penalties from over application and environmental impact could result. Always be aware of the regulations in your particular state and local area.

42. Q: Are we rotating solid, liquid and sludge application in different fields?
A: When developing a nutrient management plan with many different nutrient sources, each field and the crops grown on the field should be used to determine the best source(s) to be used. There may be examples where more than one source of nutrients is applied to a field over the course of the crop rotation.

43. Q: Does this CNMP meet the EPA CAFO NMP requirements?
A: A CNMP may meet some of the CAFO NMP requirements, but likely not all. It is the responsibility of the landowner to ensure that all of the components of the CAFO NMP be included for the permit requirements.

44. Q: How about soil N test every year or every 3 years?
A: Soil test results are considered “current” when taken no more than 3 years prior. Soil tests may be taken on an interval recommended by the Land Grant University or as required by state code. In some states there is no accepted soil N test.

45. Q: Will the Statement of Work national template for CNMP be updated?
A: Yes, it will be updated to meet the new format. There are several documents and templates that will be updated over the next few months to bring them all in line with the new CNMP format and policy.

46. Q: Is there a guideline as to how to charge for such CNMP's?
A: NRCS has developed payments schedules for the CNMP Conservation Activity Plan (CAP) 102. They are based on livestock type and operational size.

47. Q: These requirement are required right now? Are all of the related templates/forms, etc available?
A: The new CNMP policy became effective in October 2015. If there were CNMPs already in the development stage using the old format, it is suggest to continue and complete them in that format. Future plans will need to be developed following the new policy and format. Work is still underway updating the Manure Management Planner (MMP) software to meet the new format. (The nutrient management portion already meets the new policy.) Templates are being developed and should be available within the next couple of months.

48. Q: Is there an example of a completed CNMP to look at?
A: A sample CNMP is included as one of the documents with the webinar presentation.

49. Q: What are your suggestions for writing a CNMP that plans for multiple years when the crop rotation routinely varies by year?
A: Develop the plan by field for the planned crop rotation. If the crop rotation changes, the plan will need to be revised. Different crops have different fertility requirements, therefore the nutrient management plan changes when the crop rotation changes.

50. Q: Why are CAP102 payment schedules so heavy on P.E. hours - when CNMP certifiers are not required to be P.E.s?
A: States have varying requirements when it comes to planning engineering practices. Some require a PE and others do not. The payment schedules for the CAP 102 were developed for typical

situations. This will be evaluated during the next payment schedule cycle.

51. Q: Why is contract length with NRCS tied to a performance level within a CNMP? A landowner might need 10 years to fully implement (and be able to finance) the practices yet NRCS contracts are encouraged to be 3 to 5 years?
A: Implementation of CNMP practices are tied to regulation (7 CFR 1466.7(d)) and not just NRCS policy. Regulation states that all of the practices in the CNMP must be implemented by the end of the contract period. You should contact your local NRCS office to see if it is possible to increase some of the contract lengths to help address this issue.

52. Q: When in a contract with NRCS for a waste storage facility, does every conservation practice listed in the CNMP have to be completed before the end of the contract regardless if they have financial assistance through NRCS?
A: Yes, all conservation practices listed in the record of decisions by the landowner in the CNMP must be implemented by the end of the contract period regardless of financial assistance program payment or not. (Reference EQIP Manual 515.80.C.4.ii for CNMP implementation requirements.)

53. Q: Does the CNMP need to address all land in the producer farm data report or just land receiving manure?
A: Only the acres that will be receiving the manure from the AFO need to be included in the CNMP.

54. Q: We have a state requirement for completion of the CNMP prior to allocation of dollars to the contract. How does this match up with the CFR?
A: It would be difficult to allocate money without knowing what practices will be implemented. It makes sense that the CNMP should be developed before the contract. Your state requirement does not conflict with CNMP development and implementation policy.

55. Q: What happens if a person does not install all the practices in their CNMP by the end of the contract year in regards to 7 CFR 1466.7(d)?
A: If a practice is not implemented by the end of the contract period, there are a couple of things that can be done. First, previous payments from the contract could be requested to be returned. Second, future rankings could be impacted for previous contracts that were not completed. Possible actions should be discussed with your Programs Manager.

56. Q: What are the repercussions of not implementing all practices before the contract expires?
A: See the response to questions 55.

57. Q: If an existing practice like a waste storage facility is identified as not meeting NRCS standards, and it wasn't built by us, are we required to rehab the waste storage facility as a contingency of the CNMP?
A: Yes, if the existing storage facility which does not meet NRCS standards will continue to be used for storing manure as part of the waste management system, it will need to be rehabilitated to meet our standards.

58. Q: Are we required to include implementation requirements for existing engineered infrastructure on the facility?
A: I would not include this in the CNMP. This should be found in the case file.