

NM Technical Manual Version 12.0 Open Comment Period

Summary of Comments Received

A Meeting to discuss comments received during the Technical Manual Open Comment Period was held on 9/8/20 and 12/15/20.

Meeting Attendees:

- Frank Schneider
- Jerry Martin
- Charlie White
- Don Orner
- Mark Goodson
- Tim Peters
- Johan Berger
- Arthur Ulrich
- Mark Jackson
- Michael Aucoin
- Michael Brubaker
- Kate Bresaw

Listed below are comments received during the Nutrient Management Technical Manual open comment period. Recommendations were made to incorporate or dismiss the comment. The decision to dismiss or assign a “No Merit” status was made because either there is sufficient guidance in the Tech Manual or the request exceeds the regulatory requirements. Some comments have already been planned to be incorporated into the Tech Manual. There were a total of 39 comments received during the open comment period. Of the 39 comments received, 27 comments were determined to have merit and will be addressed in Version 12.0 of the Tech Manual. The results are listed below and will be presented to the Nutrient Management Advisory Board on January 21, 2021 and the DEP Agricultural Advisory Board on March 18, 2021.

	Comment 1 – Appendix 8 typo		
Comment	In Appendix 8, page 111 (in the new version), under “There are four scenarios that require notes to be included in the Nutrient Balance Sheet Summary Notes table”, there are only 3 bulleted items (even though it states there are 4 scenarios). Is winter manure application still supposed to be one of these four items (as it was in the previous version)? Winter application is discussed towards the bottom of the page, but I can see some planners arguing that they don’t have to put winter application notes in the NBS Summary Notes anymore because it is not listed in the Technical Manual.		
Manual Sections Impacted (Author)	Appendix 8: Importer/Broker Agreements & NBSs		
Issue Workgroup Leader	Schneider	Issue Workgroup	Schneider
Bulletin Article Author	NA		
Open Comment Period Discussion Meeting 9/8/20	Merit Winter should be the 4 th bullet		

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Issue	Comment 2 – Spreadsheet (Word)		
Comment	In future versions of the spreadsheet, can Appendix 10 be in the Word Document? The way it is in the spreadsheet the crop year is automatically entered at the top of the page, so I end up getting one Appendix 10 for each crop year, even though it's the same information for all three years.		
Manual Sections Impacted (Author)	NA , Spreadsheet (Excel, Word)		
Issue Workgroup Leader	Orner	Issue Workgroup	Martin Orner
Bulletin Article Author	Orner		
Open Comment Period Discussion Meeting 9/8/20	Merit Crop year showing up in Appendix 10 is a default, we can take it off appendix 10 moving forward. Appendix 10 will stay in excel planning document		

Issue	Comment 3 – Exported Manure Informational Packet		
Comment	Exported Manure Informational Packet: <ol style="list-style-type: none"> 1) Is the Agronomy Facts 60 the most current and accurate version? Dated 2003 on the back. 2) The Manure Management for Environmental Protection is dated November 15,2001. Again, is everything here current and correct ? 3) Is it necessary to give out the Manure Management Plan Guidance booklet? If the importers are only getting exported manure and do not generate their own manure the NBS and map is all they need to satisfy for a Manure Mgmt. Plan. Seems like we should take some time and evaluate what is needed for the packet and also to make sure information is current and accurate.		
Manual Sections Impacted (Author)	Section IV Record Keeping and Informational Requirements		
Issue Workgroup Leader	Schneider	Issue Workgroup	Schneider Brubaker
Bulletin Article Author	Schneider		
Open Comment Period Discussion Meeting 9/8/20	Merit		

Issue	Comment 4 – Plan Updates vs. Amendments		
Comment	Better communication from planner on what is being submitted, is it a update or amendment. If the CD is not clear on what is being submitted they are going to treat as an amendment.		

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	Need better guidance that updates can use the same planning template, do not need to be updated to newest version if nothing changed		
Manual Sections Impacted (Author)	Section VI Plan Amendments and Transfers		
Issue Workgroup Leader	Schneider	Issue Workgroup	Schneider
Bulletin Article Author	Schneider		
Open Comment Period Discussion Meeting 9/8/20	Merit, especially on a planner letting the CD know what they are submitting (update or amendment)		

Issue	Comment 5 – Plan Review and Approval		
Comment	Allow for full electronic submission of draft nutrient management plans, as well as, addressing review comments to see the plan through the entire review process. This could work similarly to how odor management plans are submitted / reviewed / approved. If explicitly needed, then a hardcopy for final approval can still be provided.		
Manual Sections Impacted (Author)	NMP Submission: Required Appendices and Supplemental Information		
Issue Workgroup Leader	Schneider	Issue Workgroup	Schneider
Bulletin Article Author	Schneider		
Open Comment Period Discussion Meeting 9/8/20	<p>Need to look at existing guidance in more depth. Workgroup sees pros and cons of both e-submission and hard copy submissions. Costs of printing moves to the CD, as hard copies are easier to review. During the review, advantage to electronic submission of sections to speed up review. Maybe:</p> <ol style="list-style-type: none"> 1. Draft – Electronic submission– It is on its way to get the reviewer ready 2. Hard copy submission 3. Electronic submission of changes per review 4. Hard copy submission of final plan 		

Issue	Comment 6 – Compliance		
Comment	Some type of guidance stating operators are not out of compliance if they have not over applied nutrients even if manure and crops have changed from what is written into the approved plan.		
Manual Sections Impacted (Author)	NA – Administrative Manual Comment		

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Issue Workgroup Leader	NA	Issue Workgroup	NA
Bulletin Article Author	NA		
Open Comment Period Discussion Meeting 9/8/20	<p>No Merit, Administrative Manual Issue Provide guidance in NM Administrative Manual under the status review portion, that provides guidance on documenting the issue but also providing a simple calculation that nutrient was not over applied and that the issue should be addressed in next NMP amendment. If over application is noted in a side calculation, it should be noted as a violation, etc. There is a difference when there is a thought process behind it versus just disregarding the plan and not following the plan.</p>		

Issue	Comment 7 – CAFO Public Notice Review Comments Delay		
Comment	<p>SCC could update TM and Adm guidance that we would allow “unofficial” comments to be sent to the planner before the 30-public comment period is up to speed up the review process. Letter needs to make it clear to plan writer that these many not be the final set of comments, that more comments may be coming.</p>		
Manual Sections Impacted (Author)	NMP Submission: Required Appendices and Supplemental Information		
Issue Workgroup Leader	Schneider	Issue Workgroup	Schneider
Bulletin Article Author	Schneider		
Open Comment Period Discussion Meeting 9/8/20	Merit		

Issue	Comment 8 – NBSs		
Comment	<p><u>Situation:</u> Currently, nutrient balance sheets (NBSs) affiliated as part of Act 38 NMPs or non-NMP affiliated Act 49 NBSs are not required to submit soil maps and soil descriptions to either the farmer or the public plan reviewer. When this information is not provided to the plan reviewer with NBSs that utilize the PA Phosphorus Index (P-Index), it makes confirmation of a specific field’s soil drainage class more challenging.</p> <p><u>Recommendation:</u> The SCC should consider a policy that whenever a NBS is submitted (either as part of an Act 38 NMP or under Act 49) that utilizes the P-Index, soil maps are to be included to copies sent to the conservation districts.</p>		
Manual Sections Impacted (Author)	Appendix 8 Importer/Broker Agreement and NBSs		
Issue Workgroup Leader	Schneider	Issue Workgroup	Schneider Jackson

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Bulletin Article Author	Schneider
Open Comment Period Discussion Meeting 9/8/20	Merit

Issue	Comment 9 – Appendix 2		
Comment	On Page 44 of the NMP Tech Manual, After Names & Addresses of Owners of Rented or Leased Land it lists Animal Equivalent Units and Animal Equivalent Units Per Acre before the next section of Existing Manure Storages & Capacity. However, in the sample plan provided as Supplement 2, Animal Equivalent Units and Animal Equivalent Units Per Acre are not included in that section. So my question is, do Animal Equivalent Units and Animal Equivalent Units Per Acre need to be listed in Appendix 2 or don't they?		
Manual Sections Impacted (Author)	Appendix 2: Operation Information NMP Summary		
Issue Workgroup Leader	Schneider	Issue Workgroup	Schneider Martin
Bulletin Article Author	NA		
Open Comment Period Discussion Meeting 9/8/20	Merit Short answer is that they do not need to be included in Appendix 2. Beginning with NMP Version 5.0 that information was removed from the Word portion of the NMP because it is in the Excel portion. It is shown in the NMP Summary, so it should be move there		

Issue	Comment 10 – Mixed Vegetables		
Comment	Eliminate mixed vegetables and the 10 acres rule and just make a commercial vegetable recommendation, which we already define the nutrient needs. Need to clarify mixed vegetable guidance and the 10-acre limit in the TM, in appendix 4, just combined all guidance into one commercial vegetable guidance section – NM TM Workgroup discussion 6/4/20		
Manual Sections Impacted (Author)	Appendix 4: Crop and Manure Management Information NMP Spreadsheet (Excel)		
Issue Workgroup Leader	Martin	Issue Workgroup	Martin Orner
Bulletin Article Author	Martin		
Open Comment Period Discussion Meeting 9/8/20	Merit		

Issue	Comment 11 – NBS Summary
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Comment	<p>Suggest that a line be added to the NBSs to show or indicate - "Total volume of manure planned to be utilized on these crop acres", possible on the NBS Summary page</p> <p>CDs are to enter the total volume of manure transferred from one operation to another in PK, which is fine form direct importers of manure. But with Brokered manure, the CDs do not get broker agreements, which would show this volume, but they receive and enter NBSs developed for brokering manure in PK. There is no total volume of manure listed on these NBSs developed for brokering manure. Brokers are using at least 2 to 3 times as many acres to handle the manure being transferred to the importers operation. Thus, the volumes of manure enter in PK for brokering manure are so inflated and not close to what is actually happening.</p>		
Manual Sections Impacted (Author)	NMP Spreadsheet (Excel)		
Issue Workgroup Leader	Orner	Issue Workgroup	Orner Martin
Bulletin Article Author	Orner		
Open Comment Period Discussion Meeting 9-8-20	No Merit, this is not the intent of NBS		

Issue	Comment 12 – CRP Crops and Horticulture Cover Crops		
Comment	<p>Remove the crops from the spreadsheet, and if someone need to use they can create a new crop in the spreadsheet and contact the program for a recommendation to add. Note, clarify guidance in Appendix 4 of the next TM (maximum 50 lbs. N and 40 lbs. P2O5). NM TM workgroup meeting on 6/4/20</p>		
Manual Sections Impacted (Author)	<p>NMP Spreadsheet (Excel) Appendix 4: Crop and Manure Management Information</p>		
Issue Workgroup Leader	Martin	Issue Workgroup	Martin Orner
Bulletin Article Author	Martin		
Open Comment Period Discussion Meeting 9/8/20	Merit		

Issue	Comment 13 – Field stacking of manure		
Comment	<p>Look at adding additional guidance during next TM on the discussion of contiguous versus noncontiguous acres for field stacking (NM TM workgroup meeting on 6/4/20)</p>		
Manual Sections Impacted (Author)	NMP Summary		

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Issue Workgroup Leader	Schneider	Issue Workgroup	Schneider Martin
Bulletin Article Author	Schneider		
Open Comment Period Discussion Meeting 9/8/20	Merit, look at it in the context of the contiguous acres versus non-contiguous acres and the discussion on what contiguous is		

Issue	Comment 14 – Operation Description		
Comment	Describe animal group grazing management in the operation description		
Manual Sections Impacted (Author)	Appendix 2: Operation Information NMP Spreadsheet (word)		
Issue Workgroup Leader	Schneider	Issue Workgroup	Schneider Martin
Bulletin Article Author	Schneider		
Open Comment Period Discussion Meeting 9/8/20	Merit to include a discussion and required for appendix 2 operation description		

Issue	Comment 15 – Rainfall, Runoff and Evaporation Data		
Comment	Update Supplement 7, Rainfall, Runoff and Evaporation Data		
Manual Sections Impacted (Author)	Supplement 7, Rainfall, Runoff and Evaporation Data		
Issue Workgroup Leader	Peters	Issue Workgroup	Peters Martin
Bulletin Article Author	Martin		
Open Comment Period Discussion Meeting 9/8/20	Merit This supplement will be updated		

Issue	Comment 16 – NMP Summary and Appendix 3,4,5 for each Crop Year		
Comment	<p>Look at revising or clarifying the language in NMP submission and NMP Summary, that a NMP summary and Appendix 3,4,5, etc. are needed for each crop year, in 3-year plans</p> <p><u>NMP Submission: Required Appendices and Supplemental Information –page 2, which indicates the following – “The plan must include separate Nutrient Management Plan Summary and Nutrient Management Plan Summary Notes tables for each individual crop year included in the plan. The crop year is entered in the Nutrient Management Plan Summary.”</u></p>		

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	<p><u>Plan Summary – Page 21 of 358</u>, which indicates the following – “The plan must include separate Nutrient Management Plan Summary and Nutrient Management Plan Summary Notes tables for each individual crop year included in the plan. Each set of NMP tables must identify the specific crop year the plan information addresses. Specific guidance on crop years is provided in the NMP Submission section of this manual. <u>The development of one summary covering a number of crop years is not a valid submission unless there are explanatory circumstances on the farm in which fields are not expected to change from year to year (such as a farm that is comprised of all pasture or hayland throughout the plan’s lifespan, etc.).”</u></p>		
Manual Sections Impacted (Author)	NMP Summary		
Issue Workgroup Leader	Schneider	Issue Workgroup	Schneider Martin
Bulletin Article Author	NA		
Open Comment Period Discussion Meeting 12/15/20	No Merit, its defined in existing guidance		

Issue	Comment 17 – Maps		
Comment	When multiple Farm locations are in a Plan, an overview showing the locations of the farms be included with the Plan. This is so anyone looking for the farms, can see where their location is and also the location in reference to the other farms.		
Manual Sections Impacted (Author)	NMP Summary		
Issue Workgroup Leader	Schneider	Issue Workgroup	Schneider
Bulletin Article Author	NA		
Open Comment Period Discussion Meeting 12/15/20	No Merit, discussion in existing manual		

Issue	Comment 18 – Maps		
Comment	Farm Maps need to be on aerial photography so the actual location of the fields, BMP’s, streams, wells etc. can be identified.		
Manual Sections Impacted (Author)	NMP Summary		
Issue Workgroup Leader	Schneider	Issue Workgroup	Schneider

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Bulletin Article Author	NA
Open Comment Period Discussion Meeting 12/15/20	No Merit, discussion in existing manual

Issue	Comment 19 – Appendix 3 for 3-year NMPs		
Comment	For farms that don't change animal types or numbers, receiving three copies of Appendix 3 and Manure Analysis 5 Year Running Average is redundant. This might be tricky, but is there a way to print one set of each with all three crop years on it? In the past, Appendix 3 didn't have crop years on it, so it could count for all years. For some farms that change animal numbers often, this won't work, but for many of them it would.		
Manual Sections Impacted (Author)	Appendix 3: Manure Group Information		
Issue Workgroup Leader	Martin	Issue Workgroup	Martin
Bulletin Article Author	NA		
Open Comment Period Discussion Meeting 12/15/20	No merit, guidance is appropriate		

Issue	Comment 20 – Manure Spreader Calibration		
Comment	Manure Spreader Calibration Notes - The manure spreading equipment is not as likely to change between crop years. Could this get put in the Word Document so we don't get 3 copies of this?		
Manual Sections Impacted (Author)	NMP Summary		
Issue Workgroup Leader	Schneider	Issue Workgroup	Schneider Martin
Bulletin Article Author	NA		
Open Comment Period Discussion Meeting 12/15/20	No merit, guidance is appropriate		

Issue	Comment 21 – Exported Manure Summary		
Comment	Under Exported Manure Summary, could the instructions specify listing all manure haulers/brokers and their certification numbers (or maybe include this somewhere else in the plan)? The instructions as written now are a general statement that could imply that information should be there, but I find it's usually not included.		

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Manual Sections Impacted (Author)	Appendix 8		
Issue Workgroup Leader	Schneider	Issue Workgroup	Schneider
Bulletin Article Author	NA		
Open Comment Period Discussion Meeting 12/15/20	No merit, guidance is to provide the method of export versus individuals and their cert number		

Issue	Comment 22 – NBS Summary Notes		
Comment	On page 111 (Appendix 8, page 9), “winter application” is missing in the list of the four scenarios that require NBS Summary Notes to be completed.		
Manual Sections Impacted (Author)	Appendix 8: Importer/Broker Agreements & NBSs		
Issue Workgroup Leader	Schneider	Issue Workgroup	Schneider
Bulletin Article Author	Schneider		
Open Comment Period Discussion Meeting 12/15/20	Merit		

Issue	Comment 23 – Redoing NBS		
Comment	<p>TM stated that NBSs have to be updated to the most recent spreadsheet version whenever plans are amended.</p> <p>Commentator was told at a broker/hauler training that NBS spreadsheets do not have to be redone every 3 years unless they meet certain criteria.</p> <p>If you look on pages 110-111 of the TM, it says the NBSs would have to be redone and reauthorized by the district if any of the following are true:</p> <ul style="list-style-type: none"> - The new soil tests require a change in the planning option - The new soil tests require a change in the nutrient application rates - The average manure analysis observed over the past 3 years has changed by more than 20%... <p>When you read these criteria, maybe the NBSs don’t have to be redone every 3 years.</p> <p>But, then when you read page 7 of 366, it states “Note: When a NMP that contains NBSs for importers is amended, the NBSs are to be updated to the most recent planning version of the Nutrient Balance Sheet Spreadsheet.”</p> <p>Is the TM contradicting itself? I did not see any references in these sections to Act 38 vs. Act 49 NBSs.</p>		
Manual Sections Impacted (Author)	NMP Submission: Required Appendices and Supplemental Information Appendix 8: Importer/Broker Agreements & NBSs		

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Issue Workgroup Leader	Schneider	Issue Workgroup	Schneider
Bulletin Article Author	Schneider		
Open Comment Period Discussion Meeting 12/15/20	Merit, Guidance could be clearer		

Issue	Comment 24 – Website Update		
Comment	<p><u>Situation:</u> Whenever there is a revision to either Technical Manual and the Administrative Manual after first publishing, notices are sent out to conservation districts and commercial nutrient management specialist with directions on how to modify their original paper or electronic copies. However, it has been noticed that these manual updates are not always reflected on the PA Nutrient Management Program website administered by Penn State Extension. Many people typically refer to the website instead of downloading a copy and then make changes to the original.</p> <p><u>Recommendation:</u> While this may be a challenge, the SCC should coordinate with Penn State Extension’s website administrators and update the entire Technical and/or Administrative Manual online whenever a modification is made. Also, the website should indicate these Administrative Manual changes under the current “Chapter 7—Record of Changes” link and a similar weblink for Technical Manual changes.</p>		
Manual Sections Impacted (Author)	NA		
Issue Workgroup Leader	NA	Issue Workgroup	NA
Bulletin Article Author	NA		
Open Comment Period Discussion Meeting 12/15/20	No merit, weblinks on the NM website are updated before or the same time that the notices of an update in sent out.		

Issue	Comment 25 – Estimating Yields for Pasture
Comment	The Estimating Forage Yields for Pastures is confusing that if the soils are poor yielding and poor management. The yield (1 to 1.5) is below the AASL minimum yield for pastures from AASL, so soil recommendations are not available from Penn State. From looking at the Agronomy Book, the nitrogen would be fine to estimate at the 50 lbs. / ton of yield but nothing is included for P and K recommendation. I think clarification is needed, especially horse operations where pasture are usually grazed closely.
Manual Sections Impacted (Author)	Supplement 1: Agronomy Guide Tables

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Issue Workgroup Leader	Martin	Issue Workgroup	Martin White
Bulletin Article Author	Martin		
Open Comment Period Discussion Meeting 12/15/20	Merit to further review		

Issue	Comment 26 – NBS maps		
Comment	Require that address be included on each NBS map header. Concern is that the field locations are very difficult to identify just from road names		
Manual Sections Impacted (Author)	Appendix 8: Importer/Broker Agreements & NBSs		
Issue Workgroup Leader	Schneider	Issue Workgroup	Schneider
Bulletin Article Author	Schneider		
Open Comment Period Discussion Meeting 12/15/20	Merit, only when Arial photography is not used		

Issue	Comment 27 – NBS maps		
Comment	Can a location map for NBS fields be required		
Manual Sections Impacted (Author)	Appendix 8: Importer/Broker Agreements & NBSs		
Issue Workgroup Leader	Schneider	Issue Workgroup	Schneider
Bulletin Article Author	NA		
Open Comment Period Discussion Meeting 12/15/20	No Merit - Language from Appendix 9 can be added – “For operations that contain multiple farms, a county or township map, that shows the location of each individual farm, that make up the larger operation.”		

Issue	Comment 28 – Submission of Plans		
Comment	Electronic submission should be permanently acceptable for all plans. It has been working.		
Manual Sections Impacted (Author)	NMP Submission: Required Appendices and Supplemental Information		
Issue Workgroup Leader	Schneider	Issue Workgroup	Schneider
Bulletin Article Author	Schneider		

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Open Comment Period Discussion Meeting 12/15/20	Merit
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Issue	Comment 29 – Manure Storage Volume Calculations		
Comment	<p>Manure Storage Volume Calculations, the instructions for determining usable depth in Supplement 8 is: “d = useable depth of tank for liquid storage requires deducting freeboard, the 25-year 24-hour storm depth, and net rainfall over evap.** ** This value may be zero if included in Appendix 3, volume needed.” An explanation should be included describing why the net rainfall over evaporation is not used the computation.</p>		
Manual Sections Impacted (Author)	Supplement 8: Manure Storage Volume Calculations		
Issue Workgroup Leader	Peters	Issue Workgroup	Peters Martin
Bulletin Article Author	Peters		
Open Comment Period Discussion Meeting 12/15/20	Merit		

Issue	Comment 30 – Small Animal Groups		
Comment	<p>The current wording in the TM is: “1. The animal groups included in the manure group represent less than 5 AEU’s and the, 2. The AEU’s of the animal groups included in the manure group is less than 5% of the total AEUs in the nutrient management plan.” The current wording creates confusion in that it does not clearly state whether the meaning is: 1. Each of the animal groups or the total of the animal groups making up the Small Quantity Animal Groups must be less than 5 AEU’s and 2. The AEU’s of each animal group or the total of the AEU’s making up the Small Quantity Animal Groups. Recommend the wording be changed to read: “1. The total of all the animal groups included in the manure group represent less than 5 AEU’s and the, 2. The total of all the AEU’s of the animal groups included in the manure group is less than 5% of the total AEUs in the nutrient management plan.”</p>		
Manual Sections Impacted (Author)	Appendix 3: Manure Group Information		
Issue Workgroup Leader	Martin	Issue Workgroup	Martin

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Bulletin Article Author	Martin
Open Comment Period Discussion Meeting 12/15/20	Merit for further review of wording

Issue	Comment 31 – CAO Determinations		
Comment	During a recent review of a large plan, the reviewer requested that I include AEU calculations in App 10 of my plan to ensure that the operation was a CAO and not a CAFO. I could not find anywhere in the current TM that a CAFO is defined as an operation having 1000 or more AEU's. A statement to that effect should be included in the section on CAO determination.		
Manual Sections Impacted (Author)	Appendix 1: NMP Agreement & Responsibilities		
Issue Workgroup Leader	Schneider	Issue Workgroup	Schneider
Bulletin Article Author	NA		
Open Comment Period Discussion Meeting 12/15/20	No Merit, the language is clearly stated in Appendix 1		

Issue	Comment 32 – Nutrient Balance Sheet		
Comment	Require to have a location address or coordinates on ALL NBS submitted.		
Manual Sections Impacted (Author)	Appendix 8: Importer/Broker Agreements & NBSs		
Issue Workgroup Leader	Schneider	Issue Workgroup	Schneider
Bulletin Article Author	NA		
Open Comment Period Discussion Meeting 12/15/20	Merit if not using Arial photography as an underlay		

Issue	Comment 33 – Contiguous acres		
Comment	Page 43- Contiguous acres Please explain “contiguous” a little more clearly. Sometimes exporters have acreages that extend for miles from their buildings. For example, where does “continuous” stop? Parcel boundaries? FSA Tract numbers (which can include a lot of acres sometimes)? Do roads make the acres non-contiguous?		
Manual Sections Impacted (Author)	Appendix 2: Operation Information		

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Issue Workgroup Leader	Schneider	Issue Workgroup	Schneider
Bulletin Article Author	Schneider		
Open Comment Period Discussion Meeting 12/15/20	Merit		

Issue	Comment 34 – Contributing Distance		
Comment	Page 83- Contributing Distance Please define whether or not well-vegetated pastures without a 35-foot fenced setback from streams can use a 6 here (or do these situations require the use of a 9?).		
Manual Sections Impacted (Author)	NMP Summary Appendix 5: Phosphorus Index		
Issue Workgroup Leader	Martin	Issue Workgroup	Martin White
Bulletin Article Author	Martin		
Open Comment Period Discussion Meeting 12/15/20	Merit, NMP summary notes need to be moved to Appendix 5.		

Issue	Comment 35 – Plan Amendments		
Comment	Page 149- under section “c” Should this sentence state: For example, where a CAO changes from providing exported manure to known neighboring landowners to providing exported manure to a manure broker <i>or from a broker to known importers?</i>		
Manual Sections Impacted (Author)	Section VI, Plan Amendments and Transfers		
Issue Workgroup Leader	Schneider	Issue Workgroup	Schneider
Bulletin Article Author	Schneider		
Open Comment Period Discussion Meeting 12/15/20	Merit		

Issue	Comment 36 – Signatures and Printed Names		
Comment	Page 189- Appendix 1 Is it possible to include a line for the operator’s printed name (since signatures are not always legible)?		

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Manual Sections Impacted (Author)	Supplement 2, Sample NMP		
Issue Workgroup Leader	Martin	Issue Workgroup	Martin
Bulletin Article Author	NA		
Open Comment Period Discussion Meeting 12/15/20	No Merit, electronic signatures are allowed		

Issue	Comment 37 – List of Importers		
Comment	Page 211- Appendix 8 cover page Would it be possible to require that all importers be listed on this page?		
Manual Sections Impacted (Author)	Supplement 2, Sample NMP		
Issue Workgroup Leader	Martin	Issue Workgroup	Martin
Bulletin Article Author	NA		
Open Comment Period Discussion Meeting 12/15/20	No Merit, the applicable agreement are attached in this section		

Issue	Comment 38 – Manual Setup		
Comment	Digital Manuals – The web versions of both the Tech and Admin manuals are difficult to navigate. It would help us greatly if these digital versions could contain hyperlinked TOC along with a TOC link on each page. The organization and indexing of the manual contents is confusing at some points and could be improved for quicker referencing.		
Manual Sections Impacted (Author)	All		
Issue Workgroup Leader	Schneider	Issue Workgroup	Schneider Seeley Orner
Bulletin Article Author	NA		
Open Comment Period Discussion Meeting 12/15/20	Merit		

Issue	Comment 39 – Typo		
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Comment	In the tech manual page 127 we make a reference to “ item 10 below” we have since added some information in so now that reference should be to “item 11 below”		
Manual Sections Impacted (Author)	Section III Minimum Standards for Manure Storage Facilities		
Issue Workgroup Leader	Schneider	Issue Workgroup	Schneider
Bulletin Article Author	NA		
Open Comment Period Discussion Meeting 12/15/20	Merit		