

1 CHALLENGES IN IMPLEMENTING PHOSPHORUS BASED 2 NUTRIENT MANAGEMENT PLANNING

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12 **ABSTRACT.** *The last decade has seen major research strides in the US, highlighted by efforts in*
13 *Pennsylvania and surrounding states, to develop phosphorus (P) management strategies for protecting water*
14 *quality in a sustainable animal agriculture production system. The most visible outcome of this effort has been*
15 *the development of state of the art phosphorus site indices (P Index). The P Index has been adopted as a*
16 *component of nutrient management policy or regulations in 47 states. While research on agricultural P and the*
17 *environment continues, new efforts are currently under way focusing on implementation of P- Index based*
18 *policies. Significant challenges have emerged as we have transitioned into implementation. These include*
19 *fundamental questions about the underlying validity of the P Index and the relationships between regional*
20 *nutrient balance and BMP-based approaches such as the P Index. Also, many operational challenges have been*
21 *identified such as: costs and time required for P-Index based plans; variable implementation costs due to*
22 *location and type of operation; integration of P- Index based plans with other plans such as farm conservation*
23 *plans; and what BMPs are available to address problems identified by the P Index. Like many other areas, we in*
24 *Pennsylvania and the Mid-Atlantic region have been working to evaluate and develop practical responses to*
25 *these challenges. This paper discusses some of the key challenges we face and how we are responding. Examples*
26 *of intra- and interstate collaboration to address technical and policy issues are also provided.*

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28 **Keywords.** *Best management practices, eutrophication, manure management, nutrient management,*
29 *phosphorus index, phosphorus runoff, water quality*
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31 Phosphorus (P) is an essential element for crop and animal production. However, excessive P
32 inputs to freshwater systems can result in accelerated eutrophication (Carpenter et al., 1998) making
33 the water unfit for many uses. While there are many potential point and non-point sources of P
34 affecting water quality, intensive animal agriculture has been identified as a primary source (USGS,
35 1999).

36 **STRATEGIC ISSUES IN P MANAGEMENT**

37 To effectively address the problem of agricultural non-point source P pollution, it is important to
38 recognize that while individual farm nutrient management tactics are important, the root cause of the
39 problem derives from the strategic organization of modern animal agriculture. Market based
40 economics have produced an organizational pattern whereby animals are concentrated on highly-
41 specialized farms that are located separately from grain-producing areas where feed for the animals is
42 produced. This has resulted in a major accumulation of excess nutrients in areas dominated by animal
43 production (CSREES, 2004; Kellogg et al., 2000). At the same time, significant non-market forces
44 arising from environmental concerns are providing negative feedback about nutrient management
45 resulting in a collision of economic and social power (Lanyon, 2000). For instance, nutrient
46 management plans written to protect water quality can have significant negative economic
47 consequences for the farmer. Therefore, the tactical approaches used to address nutrient management
48 issues, as discussed in this paper, must be considered in the context of this larger strategic picture.
49 These approaches are important and should reduce the immediate water quality impacts of intensive
50 animal agriculture, but they do not address the larger nutrient imbalance/surplus that ultimately drives
51 the water quality problem.

52 **APPROACHES TO P BASED MANAGEMENT**

53 In 1999, the USDA and USEPA published a joint unified strategy for nutrient management
54 (USDA/USEPA, 1999). This laid out a strategy for implementing comprehensive nutrient management
55 plans (CNMP) on animal feeding operations in the US. The USDA/USEPA strategy provided three

56 options for managing P in CNMPs: (1) Agronomic soil test based P management; (2) environmental P
57 threshold soil test based P management; and, (3) P site index based P management. Sharpley et al.
58 (2003) reported that 47 states have adopted the P Index approach as part of their CNMP process.

59 **THE P INDEX APPROACH**

60 The P Index is based on the concept of critical source area (CSA) management. P loss generally
61 occurs from only a small part of a watershed (CSAs) during a few storm events (Pionke et al., 1997).
62 Within a watershed, CSAs can be found in areas where a concentrated source of P coincides with a
63 mechanism to transport the P to water. Thus, scientists studying P transport refer to “source” and
64 “transport” variables as separate factors controlling P export from watersheds.

65 The P Index is a field evaluation tool that was developed to identify CSAs that have a high
66 vulnerability or risk of P loss to surface water bodies. The concept of a P Index was originally
67 proposed by Lemunyon and Gilbert (1993). Much research followed publication of this concept and
68 current P indices are the outcome of a major international research and development endeavor to refine
69 a management approach that protects water quality from P pollution and enables sustainable, economic
70 animal agricultural production.

71 The P Index combines readily available indicators of P sources and P transport potential that
72 determine P loss from agricultural fields. While there are differences between P indices across the
73 country (Sharpley et al., 2003), commonalities abound and the Pennsylvania P Index can be viewed as
74 a typical example. Source factors used in the Pennsylvania P Index (Weld et al., 2003) are Mehlich-3
75 soil test P; P fertilizer application rate and method; and manure P application rate, method, and P
76 source availability coefficient. Transport factors include soil erosion, runoff potential, subsurface
77 drainage, distance to a water body, and an evaluation of management practices that impact potential P
78 loss from a field. These factors are combined in a simple calculation to arrive at a P Index value for the
79 field that allows fields to be ranked on the basis of their vulnerability to P loss. The P Index value is
80 used to determine whether the manure application rate may be limited and/or other management
81 practices may be required to address P concerns. Other management practices may include installation

82 of best management practices (BMPs) to reduce transport potential, such as common erosion control
83 practices or buffers. Alternatively, changes in the time or method of manure application may reduce
84 the risk of P loss to the point where manure can be applied.

85 The P Index is viewed as a practical, effective method of addressing P runoff related to manure
86 applications because it P focuses on critical factors found to impact P loss. The index identifies those
87 fields that are likely to affect water quality by the loss of dissolved and sediment-bound P and limits
88 application rates or directs implementation of other management practices, as the situation warrants.

89 **CHALLENGES TO P INDEX IMPLEMENTATION**

90 While research on validating and calibrating the P Index and its components continues, efforts
91 have begun across the country to implement the P Index in nutrient management planning. Several
92 important challenges to implementing the P Index have been identified.

93 **OPERATIONAL CHALLENGES**

94 Government agencies that deal with nutrient management programs have generally accepted the
95 concept of the P Index. However, even though the P Index has been developed to be a relatively
96 simple tool for use by farmers, farm advisors and regulators, it has added an additional level of
97 complexity to nutrient management planning. This has created resistance from some agency managers
98 and regulators who are concerned with the added complexity, greater workload and additional planning
99 costs associated with using the P index in nutrient management planning based programs. They would
100 prefer simpler methods, such as soil test P threshold approaches, that are easier to implement in
101 government programs, but are more difficult to implement and will result in more costly management
102 alternatives that have been shown to be less effective in targeting P-based BMPs for effective water
103 quality protection. Several things have been done to address these concerns. First, most states have
104 recognized the critical need for education programs to train field personnel to use the P Index. Second,
105 many states have adopted simple pre-screening tools to either identify areas most likely to require full
106 P Index assessment or to eliminate areas that are unlikely to present a risk of P loss and thus reduce the

107 number of fields requiring full P Index assessment. For example, in Pennsylvania fields with a Mehlich
108 3 soil test P level less than 200 ppm and that are at least 150 feet from water are considered low risk
109 and thus do not require a full P Index assessment. While full P Index assessment might be desirable in
110 all situations, the use of a pre-screening tool has been viewed as an acceptable compromise, at least in
111 the short term, to target resources to areas most likely to require P based management.

112 A critical parameter in almost every P Index is an estimate of soil loss. The potential workload to
113 calculate the estimated soil loss from the Revised Universal Soil Loss Equation (RUSLE) is a major
114 concern in many states. In response, training for nutrient management planners in using RUSLE has
115 increased. Also, several states are considering shortcut methods of doing RUSLE soil loss
116 calculations. This is an area of significant ongoing debate. Fortunately, in many cases a current farm
117 conservation plan exists which includes soil loss calculations. However, there are frequent problems
118 with integrating conservation plans and nutrient management plans. For example, in Pennsylvania we
119 have found that the definition of a “field” in a conservation plan is often different from how a “field” is
120 defined in a nutrient management plan. For the planning process to be successful this difference must
121 be resolved.

122 The use of computer software and GIS databases is frequently cited as critical to practical
123 implementation of P Index based planning. Many states have or are developing software to assist with
124 P Index assessments and integration of the results into nutrient management plans.

125 **ECONOMIC CHALLENGES**

126 Two major economic challenges to P Index management have been identified. First, is the added
127 cost to develop a plan that includes the P Index. Significantly more data collection and calculations are
128 required. In Pennsylvania, plan development assistance payments to farmers for developing P based
129 plans have been almost doubled from what they were under N based planning. Of even greater
130 concern is the cost of implementing P based plans. Weld et al. (2002) evaluated the management and
131 economic impacts of implementing P based planning on a range of representative farms in
132 Pennsylvania. In this study nutrient management plans were developed using the full P Index on all

133 farm fields (no pre-screening was used). The results were that 23% of the fields that were assessed
134 with the P Index required a P based management change. These changes ranged from simply altering
135 the timing or method of an application to a complete ban on P applications in some fields. The
136 combined total cost of first year P Index nutrient management plan implementation for all study farms
137 was \$45,380. However, the results were very site specific, varying from little or no economic impact
138 on land extensive dairies to major negative economic impacts, some resulting in a negative net farm
139 income, on some intensive swine and poultry operations.

140 **TECHNICAL CHALLENGES**

141 As the P Index has begun to be implemented several technical questions have come up. The first
142 one goes back to a question raised earlier about “what is a field”. The common approach used by
143 NRCS to calculate soil loss using RUSLE is to look at management areas on a farm landscape that may
144 include many fields. In this application of RUSLE, the soil loss calculated is an average for all fields,
145 and different crops over the entire cropping rotation. However, as noted earlier in introducing the CSA
146 concept, most P loss occurs from specific areas in a landscape during a few rainfall events.
147 Consequently, manure applied to a specific field currently cropped to corn silage might have a much
148 higher actual risk of P loss than would be estimated from using the average soil loss for the whole area
149 over a long term rotation that includes forage crops. Thus, it would seem that soil loss for the P Index
150 should be calculated for each field and for a given rotation crop. This has major workload implications
151 and is currently the subject of research to determine how critical the approach used to estimate soil loss
152 is to the validity of the P Index result.

153 A growing number of P indices include a P availability coefficient, more recently referred to as a
154 P source coefficient (PSC). The PSC provides an indication of the relative solubility of P in different
155 organic P sources, which is related to the dissolved P loss in runoff from surface applied manure. This
156 parameter is especially important for materials that have been treated to reduce P solubility such as
157 alum treated poultry litter and many biosolid materials. In the northeast, an effort is underway to
158 develop a standard list of PSCs. Also, a routine laboratory estimate of water soluble P in organic

159 materials has been developed that should enable estimation of PSC for specific materials (Wolf et al.,
160 in press).

161 Best management practices play a critical role in minimizing P loss to water. However, many
162 BMPs have not been adequately evaluated for their effectiveness in reducing P loss. Also, many P
163 Indices do not adequately address the impact of BMPs on the risk of P loss. This is both a research and
164 implementation issue, which is being addressed at local and national levels (Conservation Effects
165 Assessment Project, 2004; Sharpley et al., 2002).

166 **MEETING THE CHALLENGES**

167 These challenges are being addressed in many places. Major research and extension programs
168 have been devoted to meeting these challenges so that we can adequately address P-related water
169 quality concerns, but do it in a way that enables sustainable animal agriculture production. Several
170 common threads run through the more successful efforts. First is interagency cooperation and
171 collaboration. This includes university and ARS researchers, cooperative extension specialists and
172 agents, federal agencies such as USDA, NRCS, and EPA, state environmental and agricultural
173 agencies, and many private sector agricultural and environmental professionals.

174 Again using Pennsylvania as an example, there has been broad private and public participation in
175 the P Index development and implementation process. The agriculture industry and local organizations
176 have been ready and willing to field test P management approaches and provide constructive feedback.
177 As questions have arisen, researchers have been quick to respond to try to determine answers, often
178 with the help of state funding. In-turn, the results of this research have been rapidly integrated into
179 education and policy development efforts. This collaboration must be very broad not only across
180 organizations but also across geographical boundaries. In the Northeast, a very strong interstate,
181 interagency collaborative effort has evolved which has been very effective in developing a strong P
182 management program in the region. Finally, it is critical to educate stakeholders and policy makers so

183 that they can make informed, science based decisions on P water quality issues and support practical
184 and effective strategies such as using the P Index.

185 **CONCLUSION**

186 The use of the P Index as the basis for P based nutrient management planning has been
187 demonstrated to be a sound approach to achieving water quality goals and sustainable agricultural
188 production. While research continues to refine the P Index, new efforts are underway to address
189 challenges identified as we begin to implement this approach. These include practical concerns with
190 manpower and resource requirements both for P Index based planning and also implementation of
191 these plans. Targeting using screening tools, and providing financial support and cutting-edge
192 technology such as computer software are critical to addressing these concerns. Remaining flexible
193 and maintaining an active link to research is important to tackle the inevitable technical questions that
194 arise as we implement this new nutrient management strategy. Finally cooperation and collaboration
195 amongst stakeholders, scientists, and government agencies is crucial to success.

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