

**From:** "Souther, Andrea - NRCS, Smith River, CA" <Andrea.Souther@ca.usda.gov>  
**To:** Cherie Blatt <CBlatt@waterboards.ca.gov>  
**Date:** 12/6/2011 10:38 AM  
**Subject:** FW: Comment on Dairy Waiver and WDR

Hello Cheri:

Regarding the Nutrient Management Plan Section "Land Application Practices":

The application limits described in the first paragraph of this section cannot realistically be reached in Del Norte County. If implemented literally applications would be limited by soil moisture to June, July, August and September in some years. To meet such criteria a nutrient management plan and the associated storage requirements would over burden a dairy with storage volume requirements and reduce the fertilizer value of their manure. Their systems require application timing flexibility to make the efficient use of the nutrients. Existing water quality on the Smith River may be maintained with a less restrictive format.

Suggested Language: Use the reasonable soil application rate statement from page 6 of the Waiver Water Quality Plan OR use "The plan shall establish protocols to apply manure, litter and process water in accordance with site specific nutrient management practices that ensure appropriate agricultural utilization of the nutrients in the manure, litter or process water"

You may what to include the Basin Plan objectives as an attachment?

Andrea Souther  
USDA-Natural Resources Conservation Service  
Del Norte Local Partnership Office  
241 First St # B  
Smith River, CA 95567  
707.487.7630  
707.218.5771 - Cell