Guiomar Azevedo

I am writing to oppose several areas of the CAFO draft permit:

1. Page 22, requiring that post-harvest testing be done by October 1 is problematic since not all farmers are done with fall harvest by October 1st. The language should change to read that Fall post-harvest testing should be done all after harvest.
2. Page 22 – 24, S4.K (1) clarification is requested on the use of “nutrient.”
3. Pages 33-34, soil and manure testing should be left as it was in the last permit (testing for organic matter, ammonia/ ammonium) rather than requiring Total Kjehdahl Nitrogen (TKN) which is not a useful test for farmers.

Thank you

Guiomar Azevedo