

## Dan DeGroot

Comments on: S4.J.3. Three foot samples after an arbitrary date do not provide any useful data. I would suggest that it reads that 0-12" and 12"-24" samples be taken after harvest is completed and before any application is done, whether nutrients or irrigation.

S4.K.1. g. Estimated plant date. Weather can easily change this and the growing season seems to be shifting. To what end is this required? h. Same with estimated harvest date. To what end is this required or necessary? m. Estimate volume of N & P from multiple sources including precipitation make this requirement incredibly difficult to comply with. This type of reporting does little to aid the environment. A couple of pounds of N or P will not make a major difference to pollution and will be captured in the soil samples. Making this permit difficult to comply with will prevent some farms from even considering this permit and that is not a desired effect.

I would like to encourage the Department of Ecology to continue to strive to create a usable permit that protects the environment but also encourages the use of animal nutrients, the primary source of nutrients for cultivated agriculture for thousands of years. As study after study shows the use of animals nutrients, in a responsible manner, increases the value of agricultural soil. This permit does indeed protect the waters of the state, let us also use it to encourage all farmers to utilize this valuable resource in a way that can benefit all of us.