



Kyle Holden
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RE: Proposed NPDES and SDS General Feedlot Permit Changes

My name is Kyle Holden, and I am a representative of Holden Farms Inc. Holden Farms holds multiple NPDES permits. Holden Farms transfers manure to multiple partners from our permitted sites. Holden Farms and its land management partners will be greatly impacted by the proposed changes to the permits.

Holden Farms recognizes the importance of protecting the environment and our water sources. We are committed to being stewards for our and our partner's land. Please take the time to review the following concerns with the proposed NPDES and SDS permit changes –

- The 1,000 NPDES and SDS Permit holders generate a minority share of manure in the state of Minnesota at 33% (information shared via MPCA Chatfield Meeting 7/24/24). NPDES and SDS permits holders have stringent restrictions on land application of manure. The remaining 66% of manure generated in the state is applied with virtually no regulation. I would propose that we could make a larger impact on protecting our groundwaters by regulating the majority, rather than increasing the already high level of restrictions on NPDES and SDS permit holders.
- The proposed changes to NPDES and SDS permits will discourage farmers from using manure as a natural and renewable nutrient source for crop land. The result will be increased use of commercial, chemically produced fertilizers. The application of these fertilizers is unregulated, which may lead to an increase in nitrate load in the soil and furthering the risk to our groundwaters.

Thank you for taking the time to review and consider our public comments. As farmers, protecting the environment and water quality are crucial to the sustainability of our businesses. We strongly encourage the agency to consider alternative solutions to protecting our groundwater.