

June 26th, 2024

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To Whom It May Concern,

I am writing to express my concerns regarding the proposed changes of the NPDES and SDS permit regulations.. These regulations, which are intended to serve both our environment and our communities, seem to overstep their bounds, particularly with respect to the use of manure, a great natural fertilizer.

Fertilizers have been a cornerstone of successful farming practices for many years, providing immense benefits to crop yields and soil health. As we continue to advance and refine our farming techniques, it is crucial that regulatory measures support rather than hinder these practices. However, some of the current regulations appear to do more harm than good, potentially making us worse stewards of the environment and increasing carbon emissions instead of reducing them.

There are several key points that I believe need to be considered to improve these regulations:

1. **Utilization of Cover Crops:** While cover crops can be beneficial, their use should be recommended rather than required. In Minnesota, the success of cover crops can be highly variable due to our climate. There are instances where cover crops are applied but fail to grow, rendering the effort and resources expended ineffective.
2. **Spring Application of Fertilizer:** Mandating spring application can be impractical and counterproductive. Certain years present conditions that make spring application nearly impossible, and this timing is not always conducive to the best farming practices. Allowing flexibility in application timing, and eliminating the requirement for spring application when necessary, would be more beneficial for both the farming community and environmental outcomes.

I appreciate your attention to these matters and urge you to consider these points in future regulatory updates. It is essential that we balance environmental protection with practical and effective farming practices.

Thank you for your time and consideration. Should you require further information or wish to discuss this matter in more detail, please feel free to contact me at 320-287-3500.

Sincerely,  
Tyler Scott