

8/16/2024

RE: Proposed changes to the NPDES and SDS Feedlot Permits

To whom it may concern,

We, at Wakefield Pork, are committed to being good stewards of the land, and we understand the importance of clean water and of protecting the environment. After all, we too consume the water in Minnesota.

Here are a few comments regarding the proposed changes of the NPDES and SDS permits that the MPCA is looking to make:

- The holders of NPDES and SDS permits land applications have strict regulations in which they already follow, and each land application is reported to the MPCA. Are you looking at the right entity to combat this problem?
- The proposed changes to the NPDES and SDS permits are discouraging farmers from using manure as a natural nutrient source and will result in more use of commercial, chemically produced fertilizers.
- Utilizing manure as a fertilizer has more benefits than using commercial fertilizer. Properly applied manure, which has been incorporated into the soil, aids in developing more organic material in the soil, and has less risk of runoff than that of commercial fertilizer, which may have been surface applied.
- Restricting the time of manure applications in the fall puts a strain on the producer, along with manure application companies. The number of companies that apply manure is limited, and by shortening up that time frame, planned removal of manure may not be completed before fall freeze up.
- Requiring the use of cover crops following an early fall application of manure not only becomes a financial and time burden on the farmer, but it also requires additional equipment use to plant the cover crop, creating more compaction and more carbon emissions.
- Cover crops are of no benefit if the conditions are not present for proper growth.
- Spring application of all manure would be impractical. Spring field conditions and the window in which spring crop planting occurs does not allow for large volume manure application.
- With the spring soils being more wet, a spring application could increase compaction and damage the soil structure.
- Transferring manure will become more complicated. It increases the reporting requirements of the NPDES/SDS permit holder, and the transfer recipients may be hesitant to share their farm data.

We appreciate your time in reviewing these comments. As farmers and current NPDES permit holders, we encourage the agency to consider the input of those of us who are already following the guidelines set forth and encourage the agency to consider alternative solutions to protecting our groundwater.