

September 3, 2024

Minnesota Pollution Control Agency  
c/o George Schwint  
12 Civic Center Plaza, Ste 2165  
Mankato, MN 56001

Dear Mr. Schwint,

As a long time farmer and a current NPDES permit holder, I live the challenges that owning livestock and farming the land bring each day. Our farm is Minnesota Water Quality Certified, and we have received awards from our local and regional SWCDs for our conservation efforts. As I read through the proposed requirements for NPDES and SDS permits, as well as comments submitted, I think of my farm experiences and whether the changes proposed will help our environment or not. Here are some of my thoughts.

Timing of Manure application:

1. In my 40 plus years as a farmer, mid to late fall has always been the best time to apply manure from several different perspectives. Mother Nature usually gives an opportunity to apply manure in reasonable soil conditions, on all the fields available in our nutrient management plan. Soil and air temperatures are cooler. There is also a longer window of opportunity in the extremely tight schedule that all manure application professionals have.
2. Spring is highly unpredictable. Winter may last until May. Until the frost leaves the ground soils and roads for equipment are unstable. Soils may be saturated and impossible to apply manure to until well into the crop planting season. Here on our farm 2024 is a great example of this issue. From mid-April until early June, the window of opportunity for application was nearly nonexistent. Yes, we applied manure in June, long past the optimum time for planting crops in Central Minnesota.

Cover Crops and nitrate management:

1. I have a few years of cover crop experience under my belt. A cover crop is best planted in September or the first week of October at the latest. Any seed planted after that time may not germinate due to cool soil temperatures or lack of moisture.
2. Cover crops require clean seed, significant equipment investment if one wants to cover large number of acres, and people power to operate that equipment. That all comes at a time of year when labor is scarce due to harvest and other seasonal demands. We have a 20 foot no till drill that works great, but still can only cover 10 acres per hour.
3. Soybeans here are typically harvested in early October and corn as grain in mid to late October. Applying manure post-harvest and a cover crop would result in the cover crop being planted too late to make a difference.
4. Nitrate inhibitors are a good tool for nitrogen stabilization and likely more successful than cover crops in mid to late fall.

5. The agency should be open to new scientific advances in nitrate management rather than confine all manure management within narrow unworkable guidelines.
6. The 50 degree soil temperature rule is still a good rule for manure application. That rule, in combination with the best new scientific manure management practices should be retained.

Manure Transfer:

1. There should be incentives, rather than discouragement to transfer manure outside of the nutrient management plan. The focus should be on fields that scientifically prove the need for the benefits of livestock manure.
2. Establish reasonable guidelines for transfer that are clear to follow without creating a burden of paperwork.
3. Consider third party recommendations for transfer manure management from certified parties, that are then followed and documented in a manner similar to commercial fertilizer applications.

Record Keeping:

1. Action plans and action reporting are far superior than "check the box" inspections after the fact.
2. The proposed inspections of application by official permit holders "after the fact" are of little use in making real progress on our issues. Permit holders should spend that time in more meaningful ways than just standing and looking at the situation.

Soil Health:

1. While I understand that MPCA focuses on pollution danger to the environment, the part that is missing from this discussion is the positive impact livestock manure can make on our Minnesota's overall soil health. If manure is placed on the right soils at the right amount and at the right time, we can make tremendous strides forward in soil that is healthy, productive and resistant to soil erosion and leaching.
2. My opinion is we should maximize manure as a resource and then also minimize the need for commercial fertilizer. Expanding acreage access for manure should be a goal for the agency.

My hope is that meaningful solutions are brought forward that are workable for those of us in food production, while also protecting our environment. While farmers must follow the intent of the rules, please give them flexibility to make decisions that are common sense. I hope you will consider my comments to be useful in this process.

Sincerely,



Patrick Lunemann

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