My name is Jeff Bauman. I am an Ag Nutrient Consultant. I work with farms across Minnesota. Our goal is to protect the environment when applying manure. Farms depend on the nutrients provided in manure to feed the soil which then feeds the crops which feeds the livestock and poultry. Here are some thoughts for consideration.

- Best management practices for manure are not a "one-size-fits-all" approach. Farmers need options and flexibility to manage their manure and land in a way that works for them while protecting the environment

- The requirement to have cover crops or perennials in the rotation on sensitive soils to fall apply manure is unworkable for many farmers.

- Establishing a cover crop later in the fall is very difficult in many fall seasons in Minnesota when temperatures drop rapidly, and when moisture is variable. Getting the stand and growth necessary to scavenge nitrogen with cover crops will be a challenge and may not yield results.

- Cover crops will require termination, either through tillage or a herbicide pass in the spring, adding additional challenges in an already short spring planting season.

- Spring application of manure presents many challenges. Spring tends to be more wet, increasing the risk of compaction, which damages soil structure, decreases the water-holding capacity of the soil, and increases the risk of surface runoff.

- There are tools such as nitrogen stabilizers that can be utilized, in conjunction with applying manure after soil temperatures reach 50 degrees, to help mitigate nitrogen losses.

- Transferring manure is made more complicated and puts manure at a disadvantage to commercial fertilizer under the proposed changes. It increases the reporting requirements of the permit holder, requiring they get more information from transferees who may be hesitant to share private farm data.

- The required visual inspection process presents little protection as majority of manure is incorporated at the time of application, nearly eliminating the potential for surface runoff.