

Gabriela Santiago

I am glad to see some of the changes and updates that the agency has proposed for the new NPDES and SDS permits including: protecting our shared groundwater by requiring that by 2028, all lands that have manure applied to them in vulnerable groundwater areas must have either a growing crop, a perennial crop planted, or have a cover crop planted with 14 days of manure application if spreading in October and November; protecting surface waters by limiting manure application within a 100-year floodplain to only application that incorporates the manure into the soil; monitoring spreading by requiring the permit holder to do visual inspections of all land application areas; helping with clean-up and accountability by requiring the permit holder to do water sampling after a manure discharge event, and making our rules consistent by requiring people who buy manure from a permit holding operation or who spread manure for one follow the permit requirements. These new changes are a good start but there is still room for improvement. I urge you to consider, in addition to water sampling and testing being done after a discharge event, this permit should require more proactive water samplings to ensure long-term compliance with the permit and to help ensure accountability.