

Ben Daley

NPDES and SDS farms have the most regulations put on any type of farming operations in Minnesota.

What is the acres breakdown of NPDES/SDS permitted sites in their MMP.

How many acres are fertilized in Minnesota both commercial and manure.

My point is NPDES /SDS sites do not have a 1/3 of the acres in total farmland in Minnesota so we cant have 1/3 of the responsibility. We may have a 1/3 of the manure generated but that's a subset in and of itself. Also a large portion of the NPDES/SDS sites are dairy and have alfalfa in the rotation and that is well below the threshold of 10ppm according to your spreadsheet.

Figure 7

The number of acres in Winona county in NPDES/SDS sites account for less than 5% of all the ag ground in Winona county. Corn alfalfa rotation is below 10ppm. Figure 7 I've looked at other surrounding counties and have found the same.

1. NPDES/SDS permitted sites have the most regulation. Mandated nitrogen amount per acre.
2. If you breakdown NPDES/SDS, non-NPDES/SDS, and farms without animals, this regulation change affects the least amount of acres out of all 3.
3. If you count manure as fertilizer and you do these sites do not account for 1/3 of all land fertilized in Minnesota
4. Dairy farm NPDES/SDS sites have their acres below the 10 ppm threshold. figure 7

What happens when this gets approved, and the needle doesn't change? Land Stewardship and the like come banging on your door saying we are the ones at fault. Are you going to ask more out of the ones with the most regulations and the least amount of acres and doing the most prevention with those acres?

Thank you for this opportunity Ben Daley