

## Don Buhl

I wish to comment on the proposed changes. Fall application is essential to properly utilizing manure nutrients for crop production, avoiding compaction and protecting the environment which is a high priority for us. Fall application allows us to choose a time to apply manure when the soils are cool and in good condition to accept and retain the nutrients applied. Mandated spring application would force producers to compromise because of the time pressure of a short planting window. This would be likely to harm the environment because of increased compaction, increased runoff and the absence of a freeze/thaw cycle after application to condition the soil for crop production. We have had an NPDES permit for many years and have followed the regulations and reporting rules and have preserved our environment. We test our manure and our soils and apply manure in appropriate amounts to raise a crop. We do this on our own land and with the manure we transfer to other landowners. The proposed changes would do nothing to improve on how we are protecting the environment. These changes would only make it harder for us to handle our manure in a way that utilizes the nutrients in a way that protects the environment. They may look good on paper, but in the real world this could be a real mess.

Thank you for considering my comments.