

## Ryan Thelemann

The current feedlot permits are an appropriate measure that enforce common sense measures regarding how manure should be handled. Some of the new proposed rules, especially those regarding fall manure application on certain soil types are too broad and have not been researched far enough. It appears that there will be no consideration for lighter soils (based on old soil maps) where organic matter has been improved through soil conservation and the improvement of crop hybrids that resist drought and leave more crop residue on soils, increasing soil organic matter.

By restricting only permitted farms with these permits and on these soil types will put us at a disadvantage to other producers, including smaller livestock producers who are not regulated and are by no means better stewards of manure and discharge. The opposite is often the case as you drive around and see some of the practices used by smaller livestock producers-overapplication, winter application, improper storage, etc. Perhaps it would be better to get all livestock producers regulated under some basic manure management principles before imposing more regulations on those of us already going above and beyond those producers' management who aren't regulated by these permits.

Thank you,  
Ryan Thelemann