

Winona and Houston County Farm Bureau Federations



August 30, 2024

To: George Schwint

Minnesota Pollution Control Agency

12 Civic Center Plz, Ste 2165

Mankato, MN 56001

Subject: Proposed changes to NPDES and SDS General Feedlot Permits

To Whom it may concern,

Introduction

The Farm Bureau Federations of Winona and Houston Counties in Southeast Minnesota are comprised of nearly 500 farmer members who represent farms of every size, structure and commodity found in the Southeast corner of our state. Winona and Houston counties are in an area of the state with a robust livestock industry which supports hundreds of farm families directly while providing competitive markets for crop farmers in the region. The farm families who make up our membership have deep concerns over proposed changes to NPDES and SDS General Feedlot Permits. We have identified serious logistical concerns for livestock producers and users of manure nutrients which could incur burdensome expenses on farm families and hamper the use of manure by crop farmers in the region thereby favoring the use of chemical fertilizers. Of further concern is for these changes to be used as guidelines for any future changes to "7020" nutrient management rules which govern manure applications on farms not subject to NPDES or SDS permits. Over the past month, Winona and Houston County Farm Bureaus have gathered questions and comments from our members which are summarized below:

Questions

1. "What is the cost analysis for the practices they are asking to implement? Cover crops, new equipment i.e. drills, manure, tillage, tractors etc. or even more equipment to be in compliance with the extremely short 14 day window they propose to have the work done. Should also

include different equipment needed since the new rule requires them to also follow the permit holders' rules."

2. "When transferring manure how can I force my neighbor to give me his data? I understand showing transfer and ownership of manure, but what someone does with the product they receive is not my business, I have no right to my neighbors' personal farm data."

3. "How can I force the landowner or purchaser of manure to abide by the proposed new rules? Who is responsible for enforcing these rules on the person buying a product (manure)? The agency should be the one to have that information directly and not through the permit holder who has no authority over another farmer's information and personal data."

4. "Why is the purchaser of transferred manure responsible for following the strict rules for a product they purchase? It isn't that way with commercial fertilizer."

5. "Why are there dates for manure application and not weather condition related parameters? If the climate is changing why wouldn't we make it weather related instead of arbitrary dates on a calendar?"

6. "Have you done an analysis on how long every farm takes to get their pits cleaned out? Time frame of 14 day to have manure hauled out to cover crops planted is not a feasible time frame for farmers to clean out their pits completely, have time to let the manure dry in the soil before planting a crop without causing soil compaction. Not to mention if there's a rain event in that time frame, it pushes out when you can get in that field to plant. 14 days is not enough time. To have the equipment needed to inject manure as fast as possible manner so they could follow the new proposed rules would cost well over 2 million dollars."

Comments

"I am concerned with setting an arbitrary date for manure application. For example, during the month of February 2024, there were many days where soil was thawed and dry and conditions would have been favorable for manure injection. If we abide by a strict prohibition on winter application, we limit ourselves to too narrow of a window for manure application."

"These proposed changes will do little to impact water quality in the region because much of the manure is applied by smaller livestock farms who are not subject to these regulations and might not be able to afford compliance if these changes are adopted."

"1. Blue Baby Syndrome" (Methemoglobinemia) –This is a very rare health issue and can occur from several sources including medication use, ointments used and diarrhea. "In a recent review of hospital discharge data and emergency department records in Minnesota from 2000-2016, there were 10 cases of methemoglobinemia in infants greater than one day old and less than one year old." (Nitrates and Methemoglobinemia, MDH)

2. Routine pregnancy care includes a Dr. or midwife asking about water sources in the home. At the meeting we attended the Dr. who spoke did not remember her physician asking about it. This is easily forgotten in the experience of pregnancy and as time passes. If it were not being addressed, then there would be more cases.
3. The guidelines that farmers follow for manure application and application of chemical use come from research done by the University of Minnesota.
4. It's important to remember that cities are applying sludge from the sewer plants to cropland. If farmers have to build (at their own expense) manure containment for 12-13 months, then all cities will have to do that as well. For farmers and cities this will be a significant financial burden.
5. If the suggested changes are made, we will lose a lot of animal agriculture in our area. This is important because when we lose animal units, alfalfa acres are planted with corn and beans which have a greater chance for run-off. A recent change is more rye grass is being planted as cover crops which takes up nitrogen and binds it until Spring when it is needed.
6. Currently soil testing is done every 3 years and manure is sampled yearly. Application rates are documented.
7. Farmers with less than 300 animal units are not included in regular visits from feedlot officers.
8. All types of farmers should be included in the discussion about changing any rules.
9. In 2020, the Stockton-Rollingstone Watershed had a planning meeting for goals. It was suggested that help should be provided to livestock producers for engineering and structure assistance for lagoons. No help was provided.
10. Bottled water is not necessarily an improvement -

<https://www.cdc.gov/healthywater/drinking/bottled/index.html>"

Summary

Winona and Houston County Farmers have a long history of land stewardship and share a conservation ethic that is unique to this part of the state. Farmers in our area have worked with conservation groups and voluntarily adopted numerous practices that benefit surface and groundwaters. The local livestock industry understands the importance of being good neighbors by keeping manure nutrients where they are to be stored and applied. Unfortunately, the proposed changes to the NPDES and SDS General Permit do not account for the uncertainties of local weather and economic conditions and threaten the livelihood of our local family farms.

Sincerely,

Glen Groth

Winona County Farm Bureau President on behalf of Winona and Houston County Farm Bureau Federations.