

David Brockway

I am glad to see some of the changes and updates that the agency has proposed for the new NPDES and SDS permits. I want to share my support for these changes 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. I also support phasing out winter application entirely in these areas.
- 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 do visual inspections of all land application areas.
- Helping with cleanup and accountability by requiring the permit holder 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 spread manure for one follow the permit requirements.

I would also support that records of manure management be made public, and water sampling be done routinely in karst areas that have manure applications.

Thank you.