

Sierra Club North Star Chapter

Minnesota Pollution Control Agency
c/o George Schwint
12 Civic Center Plz. Suite 2165
Mankato, MN 56001

This letter is to provide comments from the North Star Sierra Club Chapter on MPCA's proposed changes to feedlot permits. The North Star Sierra Club (NSSC) is a nonprofit organization and leading grassroots voice for volunteer leaders. Improved manure best management practices, monitoring, and reporting can assist with the concerns for nitrate contamination in drinking water and prevent human health impacts including some cancers, birth defects, and pregnancy complications in Minnesota. Our comments are:

1. We agree with the proposed feedlot permit changes including a) manure application in the spring or planting cover on the land when manure is provided, b) incorporating manure into the soil when applied on a floodplain, c) inspections during and after manure application to assess any runoff, d) reinspection if it rains soon after application of the manure to the land surface if manure is not incorporated, and e) reporting any discharge of manure to the Minnesota Duty Officer, f) farmers who receive manure from feedlots must follow the conditions on manure management contained in the permit of the facility they purchased the manure from.

2. In addition, we recommend the following changes to further prevent nitrate contamination in surface and groundwater due to manure storage and application. Our recommendations include the need for monitoring and reporting on efforts to prevent this pollution.

- a. The manure application requirement options for October, November, and the winter should be required on all lands in Minnesota where manure is applied.
- b. Reporting by permit holders demonstrating compliance with feedlot permit conditions should be improved and adhered to, and this information should be made readily available to the public.
- c. Feedlot permits should require water quality monitoring plans designed for their facility and lands where manure is stored and applied and approved by the MPCA. This should include where and when sampling will be done, and which parameters are to be measured. To establish a baseline, water quality monitoring should be completed before facility construction or manure has been applied and consistently thereafter.
- d. Documentation of all inspections must be maintained and submitted to the MPCA on a required periodic basis.

We appreciate the opportunity to submit comments on the proposed feedlot permit changes. Please feel free to contact us at north.star.chapter@sierraclub.org.