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RE: Proposed changes to the NPDES and SDS permits

To whom it may concern,

I have a few comments and questions regarding the proposed changes of the NPDES and SDS permits MPCA is looking to make.

1. Does natural regrowth of small grain after harvest constitute a cover crop?
 - a. There is great regrowth in small grain fields post-harvest
 - b. This should be considered a cover crop
 - c. It's inexpensive, timely and a logical tool that livestock and grain producers should be allowed to utilize without having to add another input to an already tight budget.
2. Requiring cover crops in fields that are receiving manure should be a recommendation not a requirement. Utilizing manure as a fertilizer has many benefits that outweigh using commercial fertilizer. Penalizing producers that wish to utilize manure is counterintuitive. Properly applied manure that has been incorporated into the soil has far less potential for runoff than commercially applied fertilizer which can be surface applied and applied to areas where manure has restrictions. There are far more production acres that receive commercial fertilizer that could be monitored to make a larger impact on our lakes, rivers, streams, wetlands and groundwater than manure covered acres.
3. Restricting the timing of application of manure puts unnecessary time burdens on producers and manure applicators. As mentioned in point number 2, manure use should be promoted, not given so many restrictions that it becomes something producers don't want to deal with. I feel August and September application of manure needs to be allowed, without the burden of a cover crop and so producers can take advantage of a timeframe when manure applicators are not as busy. Manure application takes time. We need all the days we can get to apply. Whether it's September on early bean stubble or corn silage ground, we can't afford to be limited to an "after October 1" AND soil temp under 50 degrees. We need to be able to take advantage of the entire manure application window that mother nature gives us. Whether it starts in September 15 or October 1.
4. Where can I find a list of approved Nitrification Inhibitors? What constitutes an "acceptable" NI?
 - a. How can a product we currently use, if it's not on that list, be approved for the list?