

## Tess Dornfeld

As a lifelong Minnesotan who grew up in a farming community, it's important to me that feedlot operations are managed responsibly to prevent pollution impacts on local water resources, area residents, and future generations.

Your proposed changes to these permits are a step in the right direction, but the Pollution Control Agency, as your name itself says, can and must still do more to make sure feedlot operations are monitored for surface and groundwater impacts from subsurface discharges. This opportunity should also be used to require soil testing before feedlots are allowed to make additional manure applications, and to ban wintertime manure application statewide.

And since these measures are only as effective as their implementation, PCA needs to undertake more effective permit monitoring to make sure violations can be identified and addressed in a timely manner.

I'm also concerned about the rapid increase of interest in anaerobic digesters and their use on feedlots. These should not be covered under the General Permit, digesters have many additional impacts on local air pollution and quality of life for neighboring residents and communities. Feedlots with digesters must be required to have separate permits with strict pollution protections for water quality and hazardous air emissions.

As a Michigan resident recently described, "I am used to farm smells. I am a farmer myself. Manure spread, and even the turkey CAFO a mile away, were unpleasant but familiar smells that our community has lived with. The digestate was nothing like these. I could only liken it to having my head in a full port-a-potty. I am over a mile away." Minnesota has the chance to avoid this situation and PCA has a responsibility to regulate digesters.  
(<https://forloveofwater.org/flow-coalition-submits-fremont-digester-comments/>)

I also value and appreciate the expertise of our clean water advocates, and I support the comments submitted by the Land Stewardship Project, the Minnesota Center for Environmental Advocacy, and Food & Water Watch on this matter as well.