

Judy Harder

Thank you for the opportunity to voice my concerns on this important issue. I recently retired to Chanhassen but previously farmed in Cottonwood County. I continue to support MN farmers with most of my food purchases.

I am glad to see some of the changes and updates that the agency has proposed for the new NPDES and SDS permits but they seem far too simplistic. I think all life relying on our shared land & water needs stronger protection from the harmful effects of CAFOs, we deserve to have access to clean water. I support the following changes:

- 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.

The new changes are a good start but we have a lot of catching up to do. I have further suggested changes to make the proposed permit stronger and more transparent for folks and communities who are dealing with this issue daily in their lives:

- While protecting water sources in Minnesota's vulnerable groundwater areas is particularly important, all Minnesotans, regardless of where they live, deserve to have access to clean water. The additional requirements to the October, November, and winter applications of manure in vulnerable groundwater areas are good, commonsense management practices, and the requirement that those practices be followed should be extended to all lands where manure is applied.
- While it is good that record-keeping of applications will be required to help make sure that permits are being followed, there needs to be a more robust requirement for permit holders to share this information with the agency so they can ensure permits are being followed. Transparency in all aspects is a strong ally. Communities that are at risk of CAFO pollution and its effects deserve to know that permits are being followed.
- In addition to water sampling and testing being done after a discharge event, this permit should require more proactive water samplings to ensure long-term compliance with the permit and to help

ensure accountability. These permits should require water sampling and testing be done regularly around the permit holding site and where liquid manure from the site is being spread so that the agency and the public can know that long-term damage and contamination is not occurring. These permits should also require that new constructions of manure basins and new lands used for spreading must undergo water sampling and testing before construction begins or manure is spread to establish a baseline nutrient load for future testing to be measured against.

I am thankful that the agency has acted to strengthen Minnesota's NPDES and SDS permits with the intention to keep all of us along with our shared water and land safe from contamination. I hope you can courageously incorporate some of the changes suggested above to protect this fragile ecosystem we call home.

Thank you,

Judy Harder