

Peter Hibma

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[Peter.hibma@pipestone.com](mailto:Peter.hibma@pipestone.com)

320-212-5182

July 2, 2024

**RE: Proposed changes to NPDES and SDS permits**

To whom it may concern,

Although I am not a current farmer, I have lived in farming communities and work with farmers everyday of my professional career. I strongly support the efforts that the MPCA and other agencies take to protect our surface and groundwater for future generations to enjoy. With that being said, I have some comments regarding some of the specific points mentioned in the draft permits as they currently are written.

1. Although cover crops can be a benefit to many, and work in some situations, it is still not a practice that will be practical or effective in many fields or areas.
  - a. Consider this: A farmer that is actively harvesting their fields may not be finished with that task until mid November. When manure gets applied to a field of soybean stubble in mid October, there is not time for a farmer to get a cover crop planted within the 14 day window, much less have ample time for it to grow and be used for the purpose of using nitrogen and phosphorus.
  - b. To that end, what is the definition of a cover crop in these scenarios?
2. Utilizing the Nutrient Management Tool
  - a. Will there be any alternatives to using this? For example, a spreadsheet/program that can utilize the same information without having to switch programs currently in use.
3. The restrictions being put in place for manure application are more restrictive than they need to be. There are some years, such as the fall of 2023, that would not be an issue for these proposals. However, every year is not like that. Most years it is a struggle for farmers to get crop harvested and manure applied before freezing. This creates the potential for an ecological disaster if the barn pits become full before spring. It is always better to apply it at a controlled rate than to let it free flow from the barn and potentially into a ditch or waterway. Removing the ability to apply before October 15 and restricting many areas in the state for application until springtime makes it harder for everyone to accomplish their goals.

I have lived in farming communities my entire life and I strongly encourage responsible use of manure and to be smart in the ways in which we apply it.

Thank you,

Peter Hibma