

Minnesota Association of County Feedlot Officers



March 11, 2024

Re: MACFO Input on SF4492

Dear Chair Hawj, and Members of the Senate Environment, Climate, and Legacy Committee,

The Minnesota Association of County Feedlot Officers (MACFO) represents counties that have delegated authority to administer Minnesota's feedlot rule. There are currently 50 counties with delegation agreements, including most of the major livestock counties. We are an affiliate organization of the Association of Minnesota Counties (AMC), which represents all 87 Minnesota counties.

MACFO appreciates the opportunity to offer comments on SF4492 regarding manure management plan requirements (MMP) in Level 2 or higher drinking water supply management areas (DWSMA).

MACFO suggests setting a threshold for when a MMP is required for manure application in a Level 2 DWSMA. Currently, a MMP is only required for feedlots of 300 animal units or more, or a feedlot of 100 animal units or more that is applying for an Interim permit. MACFO believes 100 animal units would be an appropriate requirement for when a MMP is required within a Level 2 DWSMA as that aligns with the land application record requirement. For sites under 100 animal units applying manure in a Level 2 DWSMA, MACFO would suggest requiring them to follow the Minnesota Department of Agriculture's recommended best management practices that are published on the Departments website for that DWSMA.

The proposed language in SF4492 does not mention transferred ownership of manure. MACFO would suggest adding language to this bill that would require all recipients of manure from a feedlot of 100 animal units or more to develop their own MMP when applying manure in a Level 2 DWSMA. This added language would close any loopholes when manure is transferred into a Level 2 DWSMA as to not avoid the MMP requirements.

Minnesota Rule, Chapter 7020, exempts feedlots of 300 animal units or more from MMP requirements if the manure is land applied by a licensed Commercial Animal Waste Technician (CAWT) or certified private manure applicator. MACFO suggests adding language to this bill that would require feedlot owners of 100 animal units or more, or those receiving manure from a feedlot of 100 animal units or more to develop a MMP regardless of who is applying the manure.

MACFO appreciates the opportunity to provide written testimony and share our perspective with the committee on these items. We hope you will take our comments into consideration. If you have any questions regarding our position please contact Brian Martinson, AMC Policy Analyst, at 651-246-4156 or bmartinson@mncounties.org.

Sincerely,

Amanda Lang, Brown County
President, Minnesota Association of County Feedlot Officers