

July 22, 2025

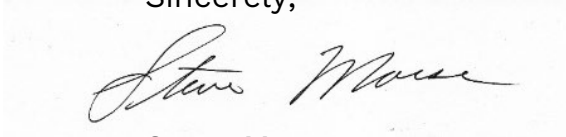
Minnesota Environmental Partnership (MEP) thanks the Minnesota Pollution Control Agency for working to update the state's Animal Feedlots Rule. Our scientific understanding of the impacts of these feedlots has advanced significantly in the 25 years since the rule was last revised, as has the scale of challenges to our clean water and climate. With both surface waters and groundwater increasingly impaired and our climate warming, Minnesota should use this opportunity to better steward our natural resources with improved feedlot standards.

MEP and our member organizations support the following updates to the rule to protect water quality and human and ecological health:

- Implement stricter limits on manure application to farm fields in areas where groundwater is especially vulnerable. These areas, including the karst region in the southeast, are struggling with the impacts of nutrient pollution linked to cancer, birth defects, and other conditions.
- Lower the number of annual units at which National Pollution Elimination System (NPDES) and State Disposal System (SDS) are required to 600 animal units. Currently, many feedlots skirt greater regulation by operating just under the permitting limit; lowering the threshold will enable more waters to be more adequately protected.
- Require feedlots with NPDES and SDS permits to closely monitor their manure discharges to protect nearby groundwater and streams. Permit conditions are only effective if enforced and can only be enforced with accurate information on discharges.
- Change how multiple small feedlots with the same owner are regulated. Currently, an owner of multiple feedlots, even feedlots right next to each other, can skirt stronger regulations by keeping them as “separate” operations, though the total impact is the same as a large feedlot. Minnesota's environment isn't protected by creative accounting measures, only by science-based standards.
- Require more rigorous reporting on manure transfers.
- Make more manure managing data and mapping available to the public, including information about digesters and manure spreading plans. Communities near feedlots deserve the opportunity to understand the impacts that manure uses may have on their nearby environment.

We appreciate the opportunity to share our views - and the priorities of our member groups and the thousands of Minnesotans they represent - during this comment opportunity. MEP will remain engaged on this important rulemaking process as it moves forward. We urge the MPCA to prioritize the health of Minnesotans, our waters, and our climate in the development of this rule.

Sincerely,

A handwritten signature in black ink, appearing to read "Steve Morse", is written over a light gray rectangular background.

Steve Morse  
Executive Director

*Submitted with the support of the organizations listed below:*

Alliance for Sustainability

Austin Coalition for Environmental Sustainability

Clean River Partners

Clean Water Action Minnesota

Climate Land Leaders

Environmental Working Group

Friends of Minnesota Scientific and Natural Areas

Institute for Agriculture and Trade Policy

Izaak Walton League Minnesota Division

Lakeville Friends of the Environment\*

Land Stewardship Project

League of Women Voters Minnesota

League of Women Voters Upper Mississippi River Region\*

Pollinator Friendly Alliance

Renewing the Countryside

Saint Paul Bird Alliance

Save Lake Superior Association

Save Our Sky Blue Waters

*\*denotes non-MEP member*