

Minnesota Association of County Feedlot Officers



May 9, 2022

Senator Bill Ingebrigtsen
Senator David Tomassoni
Senator Justin Eichorn
Senator Bill Weber
Senator Kent Eken

Representative Rick Hansen
Representative Ami Wazlawik
Representative Kelly Morrison
Representative Todd Lippert
Representative Josh Heintzeman

Re: County Input on SF4062, Feedlot Sections

Dear Members of the Conference Committee on the Omnibus Environment and Natural Resources 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 SF4062, particularly the sections dealing with abandoned feedlots and feedlot officer training:

- **Abandoned Feedlot Inventory** (Art. 1, Sec. 2. (k), Art. 2, Sec. 68, 93): MACFO appreciates the House's interest in addressing manure storage facilities that are no longer in use but have failed to complete necessary closure procedures. In counties with delegated feedlot authority staff does work with landowners and provide information to support closure activities.

The funding for this work is adequate but meeting the requirement competes with obligations under the MPCA feedlot work plan. There is a capacity issue for county feedlot officers performing many functions including registration, permitting, inspections, education and assistance, and complaint follow-up. This work would draw some attention away from work at active feedlots which is where we get the most for the public dollars invested, providing the most environmental benefits.

MACFO requested that if this proposal advanced flexibility be afforded to the delegated counties in meeting certain program requirements for the program year under which the inventory work would be done. Without that protection counties could be subject to loss of funding and poor program reviews. It seems reasonable that if a mandate for new work is made that corresponding flexibility for current work be provided.

When counties sign a delegation agreement with the state, there are defined responsibilities and expectations. If legislation creates new obligations outside of the delegation agreements for these counties, it could prevent some already required responsibilities and expectations from being completed and be a deterrent to delegation. County delegation is good for producers and for the environment.

MACFO would encourage the legislature to consider creating financial assistance for closure activities. Counties are well positioned to communicate with facilities that are ceasing operations. These operators are often in difficult financial circumstances, access to assistance would help with compliance.

- **MACFO Training Funds** (House Art. 1, Sec. 2 (l): MACFO appreciates the allocation of funds for feedlot training purposes. We just completed establishing a new online training program for County Feedlot Officers, but there are always opportunities to improve knowledge among program partners. We may look to partnerships with the Minnesota Department of Agriculture and Minnesota Pollution Control Agency to improve training for operators and commercial animal waste applicators.

We would like to share that while these provisions provide special one-time appropriations for work and training outside of the Feedlot Program, funding for the county feedlot program has not increased in over 15 years. MACFO has long advocated for a based funding increase that gets us just above the previous high for the program (HF1063/SF909). This investment in the work of the county staff has ongoing benefits for water quality outcomes.

MACFO appreciates the opportunity to share our perspective with the committee on these items. If you have any questions regarding our position please contact Brian Martinson, AMC Policy Analyst, at 651-246-4156 or bmartinson@mncounties.org.

Sincerely,



Garrett Rohlifing, Blue Earth County
President, Minnesota Association of County Feedlot Officers