August 22, 2017

Larry Gunderson
Pesticide and Fertilizer Management Division
Minnesota Department of Agriculture
625 Robert Street North
St. Paul, MN  55155

Dear Mr. Gunderson,

I am writing on behalf of the Coalition of Greater Minnesota Cities (CGMC) in response to your request for comments on the Draft Nitrogen Fertilizer Rule. The CGMC is a nonprofit, nonpartisan advocacy organization that represents 90 cities outside the Twin Cities metropolitan area and is dedicated to developing viable, progressive communities through strong economic growth and local government. As the community sources for drinking water and the processors of wastewater throughout Greater Minnesota, our cities and city leaders have an interest in any rule aimed at minimizing the presence of nitrogen Minnesota’s waters.

In the policy positions adopted by our members, the CGMC has expressed support for cleaning up polluted waters and preventing further impairment. Our organization advocates that the state move toward a more comprehensive clean water framework that focuses its efforts in an efficient, effective and fair manner. We believe that such an approach requires greater efforts to manage pollution from agricultural run-off. Moreover, several of our cities have expressed concern about nitrogen from agricultural sources in their groundwater. The proposed Nitrogen Fertilizer Rule aligns with the CGMC’s policy goals. We support the direction of the proposal, but also recognize that certain technical aspects may require refinement based on the input from other stakeholders, including farmers.

In addition to groundwater impairment, our cities also have growing concerns about nitrogen (nitrates) in surface waters from agricultural sources. We hope the agency addresses those issues in the future as well.

Thank you for the opportunity to comment. Responses to any of the foregoing may be provided to my attention at smig@mvtwireless.com. Please also copy any such written responses to CGMC’s attorney, Elizabeth Wefel, at eawefel@flaherty-hood.com.

Best regards,

David Smiglewski, Mayor of Granite Falls
President, Coalition of Greater Minnesota Cities