Dear Mr. Gunderson,

Thank you for allowing Conservation Minnesota the chance to comment on the Draft Nitrogen Fertilizer Rule (hereinafter referred to as the “Rule”). Conservation Minnesota is driven by our network of 75,000 Minnesotans from every county in the state with one ideal in mind: to protect the Minnesota we love. We love our lakes, rivers, and wetlands and drinking good, clean groundwater. Because of this love we write today to support of the Rule- with a few additional comments.

We commend the Minnesota Department of Agriculture in creating an easy to use yet very detailed map outlining areas of the state with vulnerable groundwater resources. This map makes it clear which fields must adopt the practices of Part 1 of the Rule. However, we encourage you to consider adding additional areas to the map where public water supplies can be impacted; this includes, but is not limited to: inner wellhead management zones, wellhead protection areas, and surface water intake areas. The Minnesota Department of Health is charged with protecting drinking water sources in Minnesota, and incorporating areas that affect drinking water resources will help families and communities better protect one of their most valuable resources.

We are glad to see the Best Management Practices (BMPs) outlined in Part 2 of the Rule; however, we encourage the Minnesota Department of Agriculture to get those BMPs on the ground as soon as possible, and we see no need to wait three years for mitigation. The Minnesota Department of Agriculture has said the purpose of the Rule is, “to minimize potential sources of nitrate pollution in the state's groundwater and to protect our drinking water.” The reactive methodology of waiting for years and years of well testing to reach high concentrations of nitrate does not maximize the protective measures of the Rule. We encourage the Minnesota Department of Agriculture to consider minimizing or eliminating the three-year delay in getting BMPs on the ground – the sooner the better.

In conclusion, Conservation Minnesota commends the Minnesota Department of Agriculture in drafting the Rule to eliminate risks that could (or already may) harm our groundwater and drinking water throughout the state. We look forward to monitoring the development of the Rule and we are happy to answer any questions you have about our comments.

Respectfully,

Nels Paulsen
Policy Manager