## **Groundwater Management Comments:**

- 1. Initially, GWMA was started as a means of a protection against health issues from high nitrates. However, there have been no reported cases linked to high nitrates which begs the question, why are we "protecting" people from an issue that does not exist? GWMA has now turned into an information hack of dairy farms and a way to place blame on the dairy industry for high nitrates with no evidence to back up that claim.
- 2. Nitrates have been found to be sporadic in their location. The original well testing from domestic wells indicated no clear evidence as to where nitrates will be found and why. Monitoring wells were supposed to be a step forward in data collection to determine BMPs. The first 20 wells were more random in location and approved by GWMA but the last 11 were not approved; hardly communicated and 9 of them seem to have targeted dairy farms in their extreme close proximity to the farms. There have been numerous problems with the chosen locations of many of these wells. They have been put next to anomalies and large bodies of moving water. The wells in these locations will not prove to be solid evidence as it will throw off an accurate nitrate sample. If these wells are not for determining BMPs, why were they installed? Information collected from these wells also need to be examined as to the cause of the nitrates. Are they from animals, humans or man-made fertilizers?
- 3. On site septic systems have not been given enough research or monitoring. On site septic systems are designed to leach all of their nitrogen into groundwater while dairy farm's lagoons have been built to government specifications and are NOT designed to leach anything. Dairy lagoons are inspected yearly as well as the land that is farmed by the dairies to ensure no leaching of nitrogen has occurred.
- 4. Farming practices have made great strides using available nutrients to improve our land, our crops and our future. These strides have eliminated the farming practices of the past but we still deal with the farming practices of the past's legacy. Legacy nitrates are in the ground and has more than likely contributed to the high nitrate issues. Our farming practices of today are helping to resolve these issues by pulling the nitrates out of the ground. It would be a great step forward if farmers were acknowledged for their clean-up efforts rather than only being blamed.
- 5. The minority report is a biased, premeditated report that has no scientific or factual back-up. How can that information be considered when it was written as a complete ploy against dairy farming before a main report had been concluded? We ask that the minority report not be included because of this bias.
- 6. If dairy farms are going to be targeted without evidence of their part in this issue, the actual issue cannot be resolved and the studies will provide unsatisfactory results that in turn will leave this issue at large. There are many more factors to consider in this matter that are being ignored because activist groups have placed dairy farming in the spot light due to their agenda against dairy farming.

7. A huge part of being a farmer is being stewards of the land. History has proven that farmers are constantly evolving and have met the large demands placed on them, especially in recent years. What could be more sustainable than using cow manure as fertilizer to grow feed for our animals? Cow manure adds organic material to our soil which, in turn, helps our soil to retain water better, retain nutrients for crops better and improve soil quality all around. Commercial fertilizer has not proven to be as effective in these ways.