

Joe Nelson
Nelson Family Farms & Lanesboro Sales Commission
17055 Arrowhead Road
Mabel, MN 55954

Minnesota Pollution Control Agency
c/o George Schwint
12 Civic Center Plz, Ste 2165
Mankato, MN 56001

Re: draft general National Pollutant Disposal Elimination System feedlot permit and draft general State Disposal System feedlot permit

Mr. George Schwint & MN Pollution Control Agency,

I am writing in opposition to the MPCA proposed changes to both the National Pollutant Discharge Elimination System (NPDES) and State Disposal System (SDS) general feedlot permits. The indirect effects of this proposal is of much concern in regards to regulation that will implement compound costs - input, labor, and management - to Minnesota farmers and ranchers.

What is most concerning, and a solid foundation for opposition, is that the research that has been done in Minnesota is not justified in numbers. Today, it is estimated 21% of Minnesota's population receives their drinking water from private wells (1.2 million). *Of that 21%, less than 4% have nitrate levels above 3 mg/L. **Of the 21% of private wells, an average of .65% have contamination levels of 10% or greater.*** My math calculates that to be roughly 12,000+/- people of the 5,700,000 people in the state of Minnesota.

I want to make one thing very clear - I am not opposed to the research or better practices to make water quality a priority to Minnesotans and state level agencies. However, I am opposed to a state-wide regulation, figuring these numbers. Topography and groundwater tables vary in every part of the 51 million acres of Minnesota. **Regulations and requirements should be left to local county agencies to make best decisions for their populations** and best practices for their farmers and ranchers.

Mandating a requirement to plant cover crops in the fall with minimal evidence to conclude that such proposals will be effective, is an unfair and undermining mandate. The Minnesota Department of Health even cites that "It can be difficult to pinpoint where the nitrate in drinking water comes from because there are many possibilities."

Four generations of Nelson Family Farms have grazed livestock on the same pasture ground for over 100 years. This regulation will require us to rip up the highest quality native grass forage to plant oats and cover crops each time manure is spread. This is a practice that is absolutely

unheard of and the mandate will directly affect myself and other Minnesota farmers and ranchers.

In 2020, Fillmore County, one of the counties considered with unsafe nitrates levels, proposed requirements on feedlot capacity to reduce nitrates in drinking water only to be denied their proposal based on insufficient evidence. Our local governing agencies took this regulation and research into consideration and, by majority vote, **failed to pass** the proposed regulation.

I hope this letter brings awareness to all those who will be affected by this under researched and ineffective proposal. Thank you for your time. Please feel free to contact me with any questions or concerns on how this will affect Minnesota farmers and ranchers at 507-467-2192

Sincerely,

Joel Nelson