

Larry Greden

In regards to Page 2 of the June 2024 form "wq-f3-55", MPCA says "More than 70% of the nitrate in Minnesota waters comes from cropland". I challenge that, and I do not accept it as fact. Science does not yet have all the answers when it comes to Karst topography and the water flow between aquifers. "Since 1989, when new well standards came into place, only .03% of those newer wells have contamination problems" - Ross Dunsmoor, a Winona County employee as quoted in June 2024. Older wells were drilled as shallow as possible in order to save landowners money. Well casings were also very shallow, or nonexistent. Those countless older wells contribute nitrates to the deeper aquifers and they need to be identified and properly sealed. The City of Altura recently sealed one of their old shallow wells early in 2024. Prior to sealing, the Winona County SWCD partnered to send a camera down the well shaft to document water flow. Their observations proved that high-nitrate water was flowing in large volumes from the more shallow aquifer (with high nitrates) into the deeper aquifer (with historically low nitrates). There are countless older shallow wells in southeastern Minnesota similar to the City of Altura. What does science say about their level of contribution to nitrate levels? The City of Altura had a sewer treatment pond collapse in the 1980's or 1990's. Hundreds of thousands of gallons of raw sewage entered the groundwater. The City of Lewiston had a total sewer pond failure where the high-nitrate liquid disappeared into a sinkhole overnight also in the 1980's or 1990's. More than one million gallons of raw sewage entered the groundwater. What does science say about their contribution to nitrate levels? Proposed new regulations will require additional manure storage, which is extremely expensive. Will there be additional funding for cost share monies to help producers comply? "USDA forecasts 2024 net farm income to drop 25.1% from 2023. That follows a 16% decline from 2022 to 2023. If those forecasts hold true, that marks the two largest drops in net farm income in all recorded history" - Lori Hayes July 31, 2024. Minnesota is losing 8%+ dairy farms each year. In an economic climate with such dire forecasts, these new un-funded regulations greatly risk speeding up the loss of Minnesota farms. Please wait for science to solve the mysteries of Karst groundwater flow prior to adopting new regulations.