



September 10, 2025

Minnesota Pollution Control Agency
c/o Corrie Layfield
520 Lafayette Rd
Saint Paul, MN 55155

RE: Minnesota Nutrient Reduction Strategy 2025 update

Dear Ms. Layfield,

Minnesota Farm Bureau Federation (MFBF) appreciates the opportunity to provide comments on the 2025 draft updates to Minnesota's Nutrient Reduction Strategy (NRS). We represent over 31,000 family farmers and ranchers statewide who are directly impacted by the policies and programs under this strategy. Our members care deeply about soil health, water quality, and the long-term sustainability of their farms and communities.

We support practical, science-based approaches to nutrient management that both improve water quality and keep farms economically viable. We oppose additional mandates that place one-size-fits-all regulations on farmers. Minnesota farms are diverse and produce many different commodities across the state in different soils and climate types. Due to this complexity, regulatory approaches may not account for this operational diversity and could cause undue hardship. Instead, we encourage the state to continue pursuing voluntary, incentive-based approaches that have proven to generate meaningful improvements in conservation outcomes.

Regarding nitrate levels, we would encourage MPCA to take a closer look at [Kuehner, Runkel, and Barry \(2025\)](#). In the karstic geology of southeast Minnesota, nitrates persist in groundwater, and improvements in agricultural best management practices (BMPs) may not immediately translate to reductions in nitrate. Accordingly, reductions resulting from BMPs may take more time to become evident. In gauging progress and revising the NRS, this must be considered. Further, we would recommend replicating this study in other areas of Minnesota, such as the central sand plains. This would build on our current understanding of nitrate persistence and better inform approaches to nitrate reduction.

The draft updates to the NRS place much emphasis on adoption of novel crops and continuous living cover (CLC). MFBF recognizes that novel crops and CLC have a role in nutrient reduction, but we would caution against mandating the use of novel crops or CLC. As with any technology, there are challenges in developing markets for new crops, regardless of how promising they seem. Ultimately, farmers' decisions about what to produce are driven by markets and the opportunities they present. Economically, adoption of crops and practices that

(1) do not have markets or (2) provide little to no agronomic benefit or cost savings, is difficult if not impossible for farmers to justify. Without some level of payoff, the State cannot expect such drastic adjustments to occur.

Given that draft nitrate standards have been in development for nearly 15 years and have not been finalized, the use of these draft values in the NRS is unjustified. It is troubling that the MPCA nitrate standard development process will not be resumed until after the current NRS updates are completed and finalized, especially since they are being applied in the NRS. Transparency is critical; the methodology, scientific research, and any stakeholder input used to arrive at these draft standards should be made fully available to the public.

In addition to the points above, below we highlight the value of voluntary, incentive-based programming as well as the pitfalls of regulatory approaches to nutrient reduction. Finally, we provide high-level recommendations as draft updates to the NRS move forward.

Value of Voluntary, Incentive-Based Programs

- **Flexibility for Farmers:** The Minnesota Agricultural Water Quality Certification Program and state cost-share programs such as the Soil Health Financial Assistance Program demonstrate that conservation efforts are most effective when farmers have the flexibility to choose practices that work for their individual operations. We appreciate the updated NRS's acknowledgement of the characteristics of successful programs, with flexibility at the top of the list.
- **Adoption Rates:** Farmers are far more likely to adopt new practices when they are supported with technical assistance, cost-sharing, and peer-to-peer learning. Additionally, adoption is increased when such recommendations come from sources trusted by farmers. Again, we appreciate the NRS's recognition of these factors.
- **Continuous Innovation:** Agriculture is constantly evolving. More farmers are adopting cover crops, precision nutrient management, edge-of-field practices, and experimenting with new technologies. Great strides have been made in nutrient efficiency and these will continue, as farmers are always pursuing ways to be profitable.

Concerns with Regulatory Approaches

- **Economic Burden:** Additional mandates or compliance costs reduce farm profitability, making it harder for farm families to stay in business, especially during periods of low commodity prices and high input costs.
- **Disproportionate Impact on Small & Mid-Sized Farms:** New mandates often create paperwork and compliance burdens that fall the hardest on small and medium-sized farms, with the potential of accelerating consolidation and reducing the diversity of

Minnesota agriculture.

- **Limited Measurable Gains:** Many nutrient loading factors, such as weather events, soil type, or upstream sources, are outside of farmers' control. Policy changes should reflect the actual circumstances of nutrient concentrations and not be solely placed on farming activities.

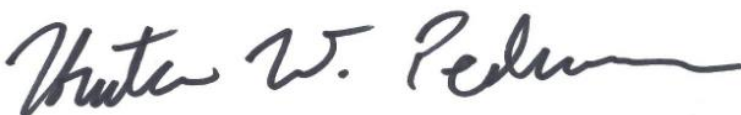
Recommendations

1. **Continue and Increase Incentives:** Increase state investment in voluntary conservation programs, cost-share opportunities, and technical assistance that help farmers adopt nutrient reduction practices. Incentives will be especially key in adoption of practices that do not provide any agronomic return or cost savings. The NRS points out that incentives help reduce barriers to adopting new practices, and that they are a component of successful programs.
2. **Support Research & Innovation:** Continue research partnerships with the University of Minnesota and ag organizations to identify and validate new practices that can improve water quality while supporting farm profitability. The best up-to-date science should be reflected in nutrient management.
3. **Recognize Farmer Progress:** Minnesota farmers have already made substantial investments in nutrient management and efficiency, soil testing, precision technology, and conservation practices. These successes should be acknowledged and built upon.
4. **Maintain Flexibility:** Avoid statewide, uniform mandates that fail to account for on-the-ground practices. What may work on one farm may not work on the next.

Conclusion

Minnesota farmers are committed to improving water quality and preserving resources for future generations. The best path forward is through voluntary, incentive-based approaches that empower farmers and ranchers. We urge MPCA to engage with farmers to learn and continue investments in programs that achieve the goals of the Nutrient Reduction Strategy. Thank you for the opportunity to provide comments.

Sincerely,

A handwritten signature in dark ink, reading "Hunter W. Pederson". The signature is fluid and cursive, with a long, sweeping underline.

Hunter Pederson

Public Policy Specialist, Minnesota Farm Bureau Federation