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September 10, 2025

Commissioner Katrina Kessler
Minnesota Pollution Control Agency
520 Lafayette Road N
St. Paul, MN 55155

Dear Commissioner Kessler,

Thank you for the opportunity to provide comment on the 2025 Nutrient Reduction Strategy Update. We appreciate the work that has gone into updating the strategy and monitoring progress across the state.

Minnesota Farmers Union (MFU) is a grassroots organization that has represented Minnesota's farmers, ranchers, and rural communities since 1918. Safe and clean water is a fundamental value for all Minnesotans, including our members who live, farm, and raise families across the state. We support efforts to protect ground and surface waters and the goals of the nutrient reduction strategy to protect and preserve this critical resource.

We are happy to see that overall, there have been improvements to nutrient load in the State's waters since 2014. It is noteworthy that during that period, crop productivity continued to increase. This is primarily due to increased farmer management of nutrients including through precision application and nitrogen efficiency, trends which we see continuing to improve as more precision equipment and practices are made available to farmers.

Many of the strategies included in the Update related to crop production are activities which we strongly support, and appreciate the inclusion of these programs and approaches in the plan. Broadly, we support voluntary, incentive-based interventions. When regulation is implemented, we encourage practical and feasible approaches that acknowledge and incorporate the complexity of farming decisions. A few key programs that we support are highlighted below:

- **Expanding soil health grant opportunities and other funding:** The MDA Soil Health Financial Assistance program has been a hugely successful and popular program with farmers and SWCDs, which are able to use the funding to purchase equipment that supports soil health. Equipment costs are an often cited barrier to soil health practices, and few programs offer this kind of financial assistance for purchasing no-till drills, cover crop seeders, and other types of equipment. Other kinds of programs, including cost-shares and direct grants for soil health practices are also important. These soil health practices are often expensive to implement and while there are often benefits including reduced input costs, more resilience to extreme weather, and improved soil health, these are often longer term and hard to account for. Financial

supports help farmers start implementing practices, and are an important strategy for expanding conservation on the landscape.

- **Support for the Minnesota Agricultural Water Quality Certification Program:** The Minnesota Agricultural Water Quality Certification (MAWQCP) is an important program that provides farmers with one-on-one technical assistance to address resource concerns. Many of our members are Ag Water Quality certified, and we've long supported the program. MAWQCP certified farms on average see a 49 percent reduction in nitrate loss through the adoption of conservation practices like reduced tillage, cover crops, and nutrient management. MAWQCP certifiers work with farmers to help them meet their goals, and the recognition from certification and the endorsements reflect the stewardship of the operators.
As the certification continues to grow, we support further funding and staffing to ensure that the same quality of service can continue. The over one-million acres now certified is a testament to the power of the program, and the work that farmers can do to improve and protect water quality.
- **Increasing workforce capacity for conservation:** We've heard from many farmers and partners that there is a lack of technical assistance providers and training resources available to develop new providers. Leadership from ag retailers like Centra Sota Co-op to develop a conservation agronomy program shows the power of providing conservation delivery from multiple sources. We support the proposals included in the NRS around training, public-private partnerships for staffing, and working with universities to draw new people into conservation as a career.
MFU is currently working with UMN Extension Climate Adaptation Partnership (MCAP) to assess and develop training curriculum through Extension around conservation agronomy and climate resilience. We see this as a critical need for the next generation of farmers and agricultural professionals.

We look forward to continued partnership on this important topic, and appreciate the attention to farmers and their communities. If you have any questions, please contact our Government Relations Director, Stu Lourey, at stu@mfu.org. Thank you for the opportunity to share our comments on the Nutrient Reduction Strategy update.

Sincerely,

A handwritten signature in black ink, appearing to read "Gary Wertish". The signature is fluid and cursive, with the first name "Gary" being more prominent than the last name "Wertish".

Gary Wertish
President, Minnesota Farmers Union