

Caroline van Schaik

We have a ridge top farm in southern Winona County where we did 2 things at the start of our stewardship of this 100 acres: we planted all the row crop strips to pasture and remain to this day a grass farm for grazing livestock, and we installed an RO system on the kitchen tap because of 30 ppm nitrate tests going back 5 years prior to our purchase. After 25 years with an old shallow well surrounded by pasture and woodland buffer, our nitrate levels currently hover around 3 ppm. This is land management at work to do what all your modeling and mission statements do not.

The outcomes of 10 years of this Nutrient Reduction Strategy are the best reasons why my first suggestion must be to exchange "voluntary" to "required." "Voluntary" is why you could predict 40 years ago that agency rules and farmland practices would poison drinking water wells and by extension, the in-state and out-state destinations this NRS is meant to address.

My second recommendation begins with Section 2.3 and the concept of load progress. Measure it in situ, not on a computer. Monitor it on farms where, as your own data tell you, 85-91% of nutrient loads are sourced. Measure against benchmarks of water health and make the polluter pay (not just a \$100 fine per a recent fish kill). The state says you can do this. Please do this.

My third suggestion is that you recognize that the fractured soluble bedrock of our Driftless region requires additional attention because surface water is ground water is our drinking water.

And my fourth and final suggestion is that MPCA remove the territorial barriers with MDA that allow each agency to pretend that fertilizers and manure are two separate and wholly unrelated evils. Nutrient loads, drinking water, fish habitat, swimmable rivers all stem from agriculture that is your shared responsibility.

Thank you.