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Subject: Updated Nutrient Reduction Strategies Comments

Date: 9-10-2025

Dear Dave Walle and NRS authors,

The Land Stewardship Project, on behalf of our farmers and members, submits these comments that highlight strategies we support while requesting changes to address concerns so that Minnesota not only achieves the nutrient reductions goals to improve water quality but also invests in farmer-led solutions that benefit rural communities.

The Land Stewardship Project is grassroots, member-driven, nonprofit agricultural organization that works with farmers and rural communities in Minnesota, Wisconsin, and Iowa. For over four decades, the Land Stewardship Project has organized small and mid-sized farmers, rural and urban residents to build a just and sustainable farm and food system, as well as healthy communities. Currently, our membership includes approximately 1,500 small and mid-sized farmers and an additional 3,000 households and 45,540 supporters. A top priority for LSP is reducing the high levels of nitrates causing groundwater contamination at levels that put more than 9,000 residents in MN's Karst region under significant threat to human health. In April 2023, LSP and our allies petitioned the EPA to address unsafe levels of nitrate contamination resulting in EPA's issuing a request that state agencies address nitrates in Southeast Minnesota now. The problem is clear. It is time for state agencies to act boldly.

Small and mid-sized farms and rural communities around the state cannot thrive, or even survive, in an environment where the over-application of manure and fertilizers threatens human and ecosystem health.

We know that the people most impacted by the problem bring the best knowledge and agency to develop and deliver solutions. Small and mid-sized farms and rural communities are already advancing solutions to the threat of nitrate pollution through their adoption of diversified cropping systems, conservation tillage, cover crops, perennial crops and rotational grazing. For example, LSP farmer leaders were at the table to develop local solutions and recommendations as part the Southeast Minnesota Nitrate Strategies Collaborative Work Group published in 2025.

After reviewing the draft MN Nutrient Reduction Strategy 2025 LSP has identified the following comments that we think are important to making sure we achieve clean water:

Nitrates in MN's waters are a serious problem.

The high levels of nitrates is one of the worst problems impacting human and ecosystem health in Minnesota. At the root of the nitrate pollution problem are cropland acres dominated by corn which is the primary crop that utilizes synthetic nitrogen fertilizers. According to MPCA, areas of the state where nitrate pollution is high, like southeastern

Minnesota, commercial application of fertilizer on cropland contributes more than 70% of the nitrate pollution.

Given the high volume of N fertilizers used in MN every year and the extent of its use across more than 8 million acres of corn in a typical year, even modest reductions on a per acre basis will have a collectively large impact. While crop diversification will lead to reduced application over time because of reduced corn acres, reductions in the amount of N fertilizers being applied are needed now to mitigate the negative impacts of nitrate pollution.

- We strongly agree with the findings of the Updated Nutrient Reduction Strategies that align with the recommendations from the Southeastern Minnesota Nitrate Strategies Work Group to accelerate a transition to perennial crops, pasture, small grains and harvested cover crops on millions of acres.
- We strongly agree that social factors are important to achieving wide-scale adoption of practices. Unpublished results from the Minnesota Office of Soil Health survey lifted up the key role of other farmers in the adoption process. Other farmers were top ranked as the group with the most influence when farmers want to learn more about a new soil management practice. LSP has seen this firsthand with the four peer-to-peer Soil Health Hubs that we coordinate in southeastern Minnesota, that in total reaches 50 farmers.
- Expanded and increased investment in Soil and Water Conservation Districts (SWCDs) as a trusted local partner and effective delivery mechanism for these nutrient reduction strategies.

To ensure Minnesota achieves clean water, LSP is asking the MPCA to strengthen the approaches to reducing the over-application of fertilizer and manure as outlined in the Nutrient Reduction Strategy draft report in the following ways:

Build

Comment: Add language to pages 190 and 289 to create a Small Grain Initiative, with similar levels of funding and a long-term commitment from the Minnesota Department of Agriculture (MDA) and the University of Minnesota, modeled after the visionary Forever Green Initiative.

Rationale: To accelerate the diversification of our cropping systems and move away from corn and achieve nitrate reductions more quickly.

Comment: Develop a program that offers a safety net for farmers who want to reduce their nitrogen fertilizer applications. Add language on page 285 to require the state, in partnership with private organizations, to develop a safety net for farmers who want to trial reduced amounts of synthetic fertilizers modeled after other successful indemnification programs.

Rationale: Indemnification approaches are successful because they provide a safety net while farmers learn how a new practice performs on their farm. These approaches rely on farmers' own common sense. Using the least amount of nitrogen fertilizer needed to achieve optimal yield is common sense. It is well established that there is a point that applying more fertilizers will not contribute to greater yield and that over-application results in surplus

nitrates in the landscape. Surplus nitrate is not only an environmental pollutant, causing harm to human health and aquatic life downstream, it is also costly to the farmer. Successful approaches like Practical Farmers of Iowa's Nitrogen Rate Risk Protection Program and the BMP Challenges compensate farmers for losses they may incur due to reducing nitrogen fertilizer application.

Grow

Comment: Add language on page 292 to require that the new Continuous Living Cover Task Force have representation of 50% farmer and farmer-led organizations.

Rationale: To move toward a transition to perennial cover as a critical strategy for achieving clean water, we want to see the new Continuous Living Cover Task Force and the visionary work of the Forever Green Initiative succeed. To increase the success of this initiative, farmers and farmer-led organizations most impacted by the problem of nitrate pollution bring the best knowledge and experience to develop and deliver solutions. This would build trust with farmers as the research and development of these crops continue.

Comment: Replicate approaches like the Olmsted County Groundwater Protection and Soil Health Program to all SWCDs across MN. On page 288 add a bullet that describes a plan with the leadership of BWSR and SWCDs to replicate a similar approach to the Olmsted County initiative in phases across the whole state, starting with southern Minnesota.

Rationale: To accelerate the reduction of nitrate pollution in southern Minnesota by replicating this successful approach.

Challenge

Comment: Strengthen data collection and reporting requirements by adding documentation of nitrogen fertilizer application rates by responsible parties (e.g. crop retailers). Request a change to the language on page 262 under "Nutrient Management Tracking" to expand manure application reporting to ensure proper crediting of all nitrogen sources when both synthetic fertilizers and manure are applied. Also require MDA to set a goal for reducing synthetic fertilizer use. Require that this reporting is mandatory and that MDA publishes the data annually.

Rationale: This mandate will provide the public with the data needed to hold our state accountable for the goal of reducing over application of manure and synthetic fertilizer. This data addresses a gap in the reliability and frequency of data that can be used to inform actions needed to hold retailers accountable to nitrate reduction goals.

Comment: Change the language from state agencies "can" support to "must" support programs that prioritize funding for farmer-to-farmer efforts that support adoption of Soil Health practices on page 192.

Rationale: Given that farmers have ranked other farmers as the group with the most influence when they want to learn more about a new soil management practice, it is imperative that funding moves to efforts that foster farmer-to-farmer networks. This is the best investment we can make toward accelerating adoption of conservation practices.

Prioritizing investments in strengthening, expanding and increasing farmer peer-to-peer networks will catalyze soil health practices becoming a wide-spread 'norm.'

Comment: Change the language on page 299 to specify that the continuation of the MAWQ Program includes new measures that require edge of field water quality testing at least three times throughout the 10-year contract. Also, on page 299 change the language from 'self-monitoring' to mandatory monitoring by MDA to document the levels of nitrates in the edge of field water drainage and ensure that it is below the 8 – 10 mg/L standard. On this page add language that requires MDA to pilot a groundwater endorsement for vulnerable soils starting in Southern Minnesota.

Rationale: Since participating in the program protects farmers from new regulations and pays farmers for the benefit of reducing N and P leaving the farm, MDA should have data to share with the public that the program is achieving its goals. Direct and reliable data from edge of field water sources should be mandatory part of participating in the program. At a minimum, edge of field water tests should be required at the beginning, five years in and at the end of the 10-year contract. If water quality doesn't improve within 5 years, the contract with the farmer should be ended.

Comments: On page 150 microplastics are listed as an emerging contamination of concern for wastewater treatment. Add language to this section that requires MDA and MPCA to develop approaches that reduce the use of microplastics in agricultural practices especially in the dairy and specialty crop farms.

Rationale: Microplastics are a widespread pollutant that requires priority attention and rapid development of approaches to limiting its use across the state and in many sectors.

We look forward to working with MPCA and other partners to achieve the Minnesota's 2040 clean water goals.

Sincerely,

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Laura Schreiber, *Government Relations Director*

Kate Rowe, *Policy Organizer, Soil Health & Climate*

Alex Romano, *Soil Health Team Manager*

