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I worked with Freshwater for over a decade. The organization was deeply involved in the issue of nutrient contamination in MN rivers, lakes and groundwater. We knew then, and know still, that the vast majority of nutrient pollution comes from, or is the result, of industrial agriculture. We knew then, and know still, that depending on farmers to voluntarily change farming practices was an utter waste of time and resources.

When money matters more than clean water, as it does now, water will always lose out. When the Clean Water Act explicitly exempted industrial agriculture, the fix was in. So my comment is, put some teeth in the Nutrient Management Plan. Make the water that leaves a farmer's land **THE FARMER'S PROBLEM**. Make clean water BMPs mandatory, and put some teeth into punishing violations.

State agencies in MN have diddled around with voluntary measures for decades and the state is not making progress. MN farmers love to repeat the myths that they are the "original stewards of the land," and that MN farmers "feed the world." Neither is true. The real story is, farming is an extractive industry (like mining, and logging) that internalizes the benefits to the practitioners, and externalizes the costs to everyone and everything else.

Make clean water BMPs mandatory, monitor the water leaving fields (especially tiled fields) and stop wasting time, effort, and resources on updates like this. We can study this issue to death, and the answer will be the same as it was in 2015. And in every study before that. Modern industrial agriculture is at the root of the problem. Rescind the exemption under the Clean Water Act, and get serious. Finally.