



July 5, 2016

Kerry Netzke, Executive Director
Area II MN River Basin Projects
1424 East College Drive, Suite 300
Marshall, MN 56258

Jason Beckler
BWSR Board Conservationist
1400 East Lyon Street
Marshall, MN 56258

RE: Yellow Medicine River Watershed 1W1P Report: Draft

Dear Ms. Netzke and Mr. Beckler,

The Minnesota Department of Agriculture (MDA) appreciates the opportunity to comment on the Draft Yellow Medicine River Watershed One Watershed One Plan (1W1P) report. The MDA is interested in the report because the land area in the watershed is primarily agricultural and we understand that successful implementation of recommended activities involves coordination of State agencies with individual producers, local government agencies, organizations, and agribusinesses located in the watershed.

The report was well written and comprehensive. A few additional comments suggested by the MDA for consideration during the report review are summarized below.

Sub-Section 3.1.3 Protect and Preserve Groundwater Quantity and Quality; Page 29

The third paragraph discusses the Nitrogen Fertilizer Management Plan (NFMP), developed by the MDA. Near the end of the paragraph, the plan states that, “Between 2014 and 2019, the MDA will offer free nitrate tests to approximately 900 private well owners statewide (within 250 to 300 townships).” The MDA estimates that statewide, approximately 70,000 private well owners will be offered free nitrate testing. Please revise this sentence reflect the correct number of wells.

Sub-Section 4.1.3 Priority Concern 3: Protect and Preserve Groundwater Quantity and Quality; Page 34

Measurable goals are listed within this sub-section of text. The third bullet states, “Reduce the number of private wells failing to meet 10 mg/L nitrate water quality standard to less than 10 percent.” This language suggests that greater than 10 percent of the wells were already tested over 10 mg/L nitrate. The Township Testing Program (TTP), through the NFMP, has not yet been completed in the targeted townships that lie within the Yellow Medicine 1W1P boundary. The townships targeted for the TTP were identified due to groundwater vulnerability and significant row-crop acres. The goal of the TTP will be to assess the current groundwater nitrate status of each township and respond appropriately based upon those finding. We are pleased to see this goal listed and agree that the bullet should be included, but perhaps the language should be edited to reflect “maintain fewer than 10 percent” rather than “reduce”.

Table 4-1 and 4-2. Priority Concern 1 & 2 Measureable Goals and Objectives; Pages 36-45

MDA is not listed in these tables. Many of these actions could be funded through the AgBMP Loan Program and/or MAWQCP.

Table 4-3. Priority Concern 2 Measureable Goals and Objectives; Pages 46-47

MDA is referenced in this table but is not included in the acronyms table. Please make sure to incorporate MDA into the acronym table.

The third bullet in the heading box states *“Reduce the number of private wells failing to meet 10 mg/L nitrate water quality standard to less than 10 percent.”* Please edit this text to reflect the comment listed above from Page 34.

Sub-Section 5.3.2 Minimize the Transport of Sediment, Excess Nutrient, and Bacteria; Page 56

One of the implementation goals found in the “BMP Implementation Goals at a Glance” figure is to *“Increase adoption of the University of Minnesota Extension targeted nutrient application rates on 35% (75,341 treated acres) of agricultural land.”* Please provide further definition of the target N rate to clarify whether this is referencing the University of Minnesota Extension maximum return to nitrogen (MRTN) range of rates that are based upon crop price and fertilizer nitrogen price or the midpoint of those range of rates. Inserting a reference may help to clarify the text.

Sub-Section 5.3.4 Protect and Preserve Groundwater Quantity and Quality; Page 58

One of the implementation goals found in the “BMP Implementation Goals at a Glance” figure is to *“Reduce the number of private wells failing to meet 10 mg/L nitrate water quality standard to less than 10%.”* Please edit this text to reflect the comment listed above from Page 34.

Sub-Section 5.8 Potential Research, Studies, Data Acquisition, and Data Management; Page 78

Refining existing BMPs, as well as methods for reducing agricultural fertilizer inputs, is commonly identified as knowledge gap in the agricultural and water quality communities. The MDA developed the Nutrient Management Initiative (NMI) to assist farmers and crop advisers in evaluating new or alternative nutrient management practices on their own fields used for corn grain production. Replicated field trial plots are implemented by the farmer and their crop adviser to evaluate agronomic and economic performance of various nutrient management practices. Some of the practices include reductions in fertilizer rate, changes in fertilizer application timing, and use of a nitrogen stabilizing product. More information on the Nutrient Management Initiative can be found at:

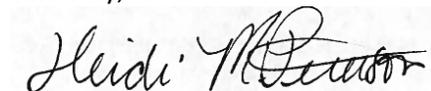
<http://www.mda.state.mn.us/nmi>

Table 6-5. State and Federal Funding Sources; Page 99

The Nitrogen Fertilizer Testing Program is identified as an MDA program as a source of technical assistance. Please change the Program/Fund Name to read, “Nitrogen Fertilizer Management Plan”.

Thank you for the opportunity to provide comments and feedback; please consider the MDA’s suggestions in the development of the final 1W1P report. If you have any questions about the comments, I can be reached at 651-201-6014.

Sincerely,



Heidi M. Peterson, Ph.D.

Impaired Waters Technical Coordinator