

Minnesota Nitrogen Fertilizer Management Plan

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Addended July 2019

Minnesota Department of Agriculture
Pesticide and Fertilizer Management Division

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Addendum to the Nitrogen Fertilizer Management Plan

7/26/19

The Nitrogen Fertilizer Management Plan (NFMP) is the state's blueprint for the prevention or minimization of the impacts of nitrogen fertilizer on groundwater. It was last updated in 2015 following input from an advisory committee and a public comment process. The purpose of the NFMP is to prevent, evaluate and mitigate nonpoint source pollution from nitrogen fertilizer in groundwater. The NFMP includes components promoting prevention and developing appropriate responses to the detection of nitrogen fertilizer in groundwater.

After revising the NFMP, the Minnesota Department of Agriculture (MDA) began developing a rule to support the proposed regulatory actions in it. This was a lengthy process with multiple formal and informal comment periods and hearings in front of an Administrative Law Judge. The outcome is a new Groundwater Protection Rule which took effect on June 28, 2019.

Under the new Groundwater Protection Rule the MDA will not be regulating at the township scale as proposed in the NFMP. It is the MDA's intent to implement the voluntary elements of the NFMP in townships, but not the regulatory aspects. The NFMP will be revised to address this in the near future. The Groundwater Protection Rule has two parts:

Part 1 of the rule focuses on restrictions to fall application of nitrogen fertilizer and application to frozen soil if you farm in 1) an area with vulnerable groundwater, or 2) the protection area around a public well with high nitrate. Vulnerable groundwater areas are determined by coarse textured soils, shallow bedrock, or karst geology and are designated by quarter sections. The protection areas are also known as Drinking Water Supply Management Areas.

Part 2 of the rule responds to Drinking Water Supply Management Areas that already have elevated nitrate. The goal is to take action to reduce nitrate in groundwater before a public well exceeds the health standard for nitrate. The rule is structured using a sliding scale of voluntary and regulatory actions based on the concentration of nitrate in the well and the use of nitrogen fertilizer best management practices (BMPs). The MDA will form a local advisory team with farmers, agronomists and other community members to review and advise the MDA on appropriate practices or requirements to reduce nitrate in the Drinking Water Supply Management Area.

There are several other changes to the final rule from the process outlined in the NFMP. These changes were based on comments received during the rule development process. The changes include:

1. The NFMP established a three growing season period to allow time for voluntary BMP adoption. The rule allows for three growing seasons, or the lag time, whichever is longer. Lag time has been added to determine whether the BMPs are effective. Lag time is the period of time it takes for nitrate to travel through an unsaturated zone to impact groundwater quality in an aquifer being monitored.
2. Soybean acres are excluded from BMP evaluation since there is not a nitrogen fertilizer recommendation for soybeans. Nitrogen rates will be evaluated in the crop following soybeans. Nitrogen credits from legumes such as soybeans will be included at that time.

3. The level 2 public water supply criterion changed from 9 mg/L to 8 mg/L nitrate-nitrogen. The purpose of this change was to address nitrate in the public water supply at a lower nitrate level, allowing more time to prevent an exceedance of the Health Risk Limit.
4. The NFMP stated that the process could become regulatory if BMPs were not adopted. In the rule, regulation can also occur if the water quality in the public well or groundwater monitoring network continues to get worse (nitrate-nitrogen levels increase) or if residual soil nitrate in soil below the root zone increases.
5. The NFMP established that nitrogen fertilizer BMP adoption is voluntary in Levels 1 and 2 and required in Levels 3 and 4. The rule keeps this concept and additionally states that in level 3, the MDA also may require the use of Alternative Management Tools (AMTs) provided that a source of funding for increased costs related to the AMTs is available. Under level 4 the requirements may include other actions that would be allowed under provisions for water resource protection requirements in Minnesota Statutes 103H. However, the rule restricts the MDA from setting the nitrogen rate requirements below the lowest University of Minnesota recommended rate and the MDA cannot restrict the selection of the primary crop.

Local monitoring networks will be used to evaluate water quality trends in townships, and to the extent possible, in Drinking Water Supply Management Areas.

A factsheet on the rule is available at: www.mda.state.mn.us/nfr

This is a brief overview of the changes that will modify the approach in the NFMP. For more information, contact Larry Gunderson at 651-201-6168 or larry.gunderson@state.mn.us

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Executive Summary

The Groundwater Protection Act of 1989 (Minnesota Statutes, section 103H) significantly altered the direction of groundwater resource protection with regard to nitrogen fertilizer management. This was a result of three separate but related components of the law:

- Development of a groundwater protection goal;
- Enhanced regulatory authority for fertilizer practices within the Minnesota Department of Agriculture (MDA); and
- Development of a Nitrogen Fertilizer Management Plan (NFMP) by the MDA.

The NFMP is the state's blueprint for prevention or minimization of the impacts of nitrogen fertilizer on groundwater. By statute, the NFMP must include both voluntary components and provisions for the development of requirements if the implementation of the Best Management Practices (BMPs) is proven to be ineffective.

Background

Current agricultural crop production systems require the input of nitrogen fertilizer to increase food, fiber, feed and fuel production for consumption by humans and livestock. However, nitrate that is not utilized by the crop may leach into the groundwater. Many of Minnesota's groundwater aquifers are susceptible to contamination due to diverse geology and soils, climate and land use.

Nitrate in groundwater is a public health concern especially for pregnant women and infants under six months of age. The drinking water standard is 10 milligrams per liter (mg/L) nitrate-nitrogen (nitrate), referred to as the Health Risk Limit (HRL). Protecting our groundwater is important since approximately three out of four Minnesotans rely on groundwater for their drinking water supply.

Many aspects of the NFMP have been implemented since the plan was first developed in 1990. These include:

- The MDA, the University of Minnesota, and numerous partners have developed, promoted and evaluated the effectiveness of the BMPs and determined their potential impacts on the state's water resources;
- Survey tools to evaluate adoption of the BMPs have been developed and successfully implemented;
- Low cost methods for groundwater monitoring and private well testing have been developed and applied;
- Partnerships with other agencies, Soil and Water Conservation Districts and other organizations have been developed or strengthened; and
- A general approach to implement local response activities outlined in the NFMP has been extensively tested and refined at several locations, particularly in wellhead protection areas, with some important successes.

On the other hand, some parts of the 1990 NFMP were not fully implemented due to limited program funding as well as challenges that come with starting any new program.

In 2010 the MDA began a process to revise the 1990 NFMP to reflect current agricultural practices and activities, apply lessons learned from implementation activities and other work, and to better align it with current water resource conditions and program resources. The MDA assembled an Advisory Committee with 18 members, including three members from the original Task Force. The MDA hosted eighteen Advisory Committee meetings between 2011 and 2012 to review information related to the nitrogen cycle, nitrate contamination of ground and surface water, hydrogeologic conditions, crop production, nitrogen management, research, and implementation.

The revised NFMP is based on information and recommendations gathered from input from the NFMP Advisory Committee (primary source), past NFMP implementation experience, Nebraska's Central Platte Natural Resources District phased approach to groundwater management, the MDA's Pesticide Management Plan, documentation of nitrate concentration levels in groundwater and drinking water standard exceedances, and advances in agricultural technology and management practices.

Overview of the Nitrogen Fertilizer Management Plan

The purpose of the NFMP is to prevent, evaluate and mitigate nonpoint source pollution from nitrogen fertilizer in groundwater. The NFMP includes components promoting prevention and developing appropriate responses to the detection of nitrogen fertilizer in groundwater. Nitrogen BMPs are the cornerstone of the NFMP.

The nitrogen BMPs are tools to manage nitrogen efficiently, profitably and with minimized environmental loss. The BMPs are built on a four part foundation that takes into account the nitrogen rate, application timing, source of nitrogen, and placement of the application. If one of the above is not followed, the effectiveness of the system will be compromised, and there will be agronomic and/or environmental consequences. Minnesota has officially recognized statewide and regional nitrogen BMPs.

The general approach used by the NFMP to address nitrate in groundwater consists of the following activities:

Prevention

It is the goal of the state that groundwater be maintained in its natural condition, free from any degradation caused by human activities. Prevention activities focus on promoting the nitrogen BMPs to protect groundwater from nitrogen fertilizer leaching in the most hydrogeologically vulnerable areas. Prevention activities within the NFMP are ongoing regardless of the status of mitigation for nitrate in groundwater. These efforts will be coordinated through a new statewide Nitrogen Fertilizer Education and Promotion Team (NFEPT). Implementation of education, outreach and demonstration activities will be accomplished through existing programs.

Monitoring and assessment

The goal of monitoring and assessment is to develop a comprehensive understanding of the severity and magnitude of nitrate in groundwater drinking water wells (public and private). The monitoring activities include identifying and selecting wells to be sampled for nitrate from a designated area, collecting and testing the water samples, obtaining and summarizing the results and conducting follow up site visits, if necessary, to confirm the results. Assessment involves establishing and reporting the overall pattern of

nitrate levels in wells within designated areas. Monitoring and assessment initiates the NFMP process and forms a basis for determining the appropriate level of action (prevention or mitigation).

Nitrate concentration data from private and public wells will be assessed based on separate criteria described below in order to determine whether the area of concern continues in a “Prevention” mode or proceeds into a “Mitigation” mode. The NFMP Mitigation mode is comprised of four implementation levels. Each successive level represents an increase in implementation effort.

The determination of the mode and level is primarily based on nitrate concentrations, trends, and adoption of the BMPs. Consideration will also be given to significant changes in land use, the size of the area, the severity of the problem, and other factors that might be expected to influence nitrate levels. There are separate nitrate concentration criteria for private and public wells, as shown in the charts below.

Private well criteria used to determine Prevention and Mitigation Modes

Groundwater Nitrate Concentration Criteria	Unknown or Below Mitigation Level 1	5% of wells > HRL or 10% of wells > 7 mg/L	10% of wells > HRL	10% of wells >HRL	15% of wells > HRL
BMP Adoption Criteria	Unknown/NA	Unknown or BMPs Adopted	BMPs Adopted	BMPs not Adopted	
Mode	Prevention	Mitigation			
Level	NA	1	2	3	4
Status	Voluntary			Regulatory	

NOTE: The Health Risk Limit (HRL) for nitrate-nitrogen in Minnesota is 10 mg/L

Public well criteria used to determine Prevention and Mitigation Modes

Groundwater Nitrate Concentration Criteria	Unknown or Below Mitigation Level 1	Wells > 5.4 mg/L	Projected to exceed 10 mg/L in 10 years or less		Wells > 9 mg/L
BMP Adoption Criteria	Unknown/NA	Unknown or BMPs Adopted	BMPs Adopted	BMPs Not Adopted	
Mode	Prevention	Mitigation			
Level	NA	1	2	3	4
Status	Voluntary			Regulatory	

NOTE: The Health Risk Limit (HRL) for nitrate-nitrogen in Minnesota is 10 mg/L

Mitigation

The goal of mitigation is to minimize the source of pollution to the greatest extent practicable and, at a minimum, reduce nitrate contamination to below the HRL so that groundwater is safe for human consumption. The mitigation strategy is based on the prevention strategy, but implemented over a defined area and at a higher level of effort and intensity. Mitigation will be accomplished by intensifying and targeting education and outreach (preventative) efforts via a multi-level approach, using/refining the existing nitrogen BMPs, developing and implementing Alternative Management Tools (AMTs); considering the cost versus benefit and technical feasibility of mitigation measures; developing incentives and, when necessary; exercising regulatory authority provided in the Groundwater Protection Act.

The mitigation process is the same for addressing nitrate in both private and public wells. All sites will start in a voluntary level (Level 1 or 2), determined using the mitigation criteria discussed in Chapter 9, and will only move to a regulatory level (Level 3 or 4) if the BMPs are not being adopted. The mitigation process generally consists of the following activities listed in the likely chronological order of implementation:

1. Form local Advisory Team (Advisory Team);
2. Select a project lead and develop a workplan;
3. Establish a local nitrate monitoring network capable of producing long term trends;
4. Hold a public information meeting(s) for farmers and other interested parties;
5. Select the right set of nitrogen BMPs to implement in the area using U of M guidance;
6. Conduct an initial survey of BMP adoption;
7. Consider Alternative Management Tools (AMTs) in high risk areas;
8. Assess the need for demonstration projects based on results from BMP adoption survey;
9. Develop a plan for educational activities based on results from BMP adoption survey;
10. Assist with obtaining funding for implementing the selected BMPs and AMTs;
11. Work with farmers to implement selected BMPs;
12. Conduct a follow up survey of BMP adoption after three growing seasons of implementation;
13. Evaluate BMP adoption; and
14. Determine appropriate mitigation level using nitrate concentration and BMP adoption criteria.

The NFMP emphasizes engaging key groups who are involved with crop production and the use of nitrogen fertilizers. Target groups include crop advisors/consultants, fertilizer retailers, and professional organizations that provide information on planning and guidance to farmers. These individuals and organizations have specialized knowledge and are in a position to influence the adoption of the nitrogen BMPs. A significant effort will be conducted to coordinate with these professionals to protect groundwater resources in a responsible and effective manner.

Structure of the Nitrogen Fertilizer Management Plan

The NFMP is organized into ten chapters. Chapter one provides a general introduction to the plan. Chapters two through six include background and technical information about nitrogen and groundwater. Chapters seven through ten outline the NFMP process, with detailed information about prevention, monitoring and assessment and mitigation. Appendices A-J supplement the chapter material.

Chapter 1 : Introduction to the Nitrogen Fertilizer Management Plan

Current agricultural crop production systems require the input of nitrogen fertilizer to increase food, fiber, feed and fuel production for consumption by humans and livestock. When applying fertilizer nitrogen to crops, the goal is to maximize its use by a crop while minimizing its loss to the environment.

Nitrogen fertilizer is typically applied in different forms, such as nitrate or ammonium. These forms of nitrogen are easily absorbed by the plants. The nitrate form of nitrogen is very soluble in water and may escape plant uptake and may leach into the groundwater.

Nitrate in groundwater is a public health concern, especially for pregnant women and infants under six months of age. This is a concern since approximately three out of four Minnesotans rely on groundwater for their drinking water supply.

When groundwater resources become contaminated with nitrate, efforts to remove or mitigate the contamination are challenging and expensive.

“Groundwater” is defined in Minnesota Statutes, section 115.01, subdivision 6 as:

...water contained below the surface of the earth in the saturated zone including, without limitation, all waters whether under confined, unconfined, or perched conditions, in near-surface unconsolidated sediment or regolith, or in rock formations deeper underground.

GROUNDWATER PROTECTION ACT OF 1989

The Groundwater Protection Act of 1989 (Minnesota Statutes, section 103H) significantly altered the direction of groundwater resource protection with regard to nitrogen fertilizer management. This was a result of three separate but related components of the law:

- Development of a groundwater protection goal;
- Enhanced regulatory authority for fertilizer practices within the Minnesota Department of Agriculture (MDA); and
- Development of a Nitrogen Fertilizer Management Plan (NFMP) by the MDA. The NFMP is a strategy for preventing, evaluating, and mitigating non-point sources of nitrogen fertilizer in Minnesota’s groundwater.

Because of the complexity of how nitrogen fertilizer affects water resources and the controversial nature of associated management decisions, the 1989 Legislature authorized the MDA to establish a Nitrogen Fertilizer Task Force to make recommendations to the Commissioner of Agriculture on the structure of the NFMP. Task Force membership was established by statute to include a diverse group of representatives from agriculture, environmental groups, local and state government.

The Nitrogen Fertilizer Task Force was responsible for reviewing current information regarding the impact of nitrogen fertilizer on water resources and for making recommendations on ways to minimize these

effects. As the result of their work and the work of the MDA staff, a NFMP was adopted by the Minnesota Commissioner of Agriculture in August 1990.

PURPOSE OF THE NITROGEN FERTILIZER MANAGEMENT PLAN

The purpose of the NFMP is to carry out requirements of the Groundwater Protection Act of 1989 as written in Minnesota Statutes, section 103H.001, which discusses the degradation prevention goal:

It is the goal of the state that groundwater be maintained in its natural condition, free from any degradation caused by human activities. It is recognized that for some human activities the degradation prevention goal cannot be practicably achieved. However, where prevention is practicable, it is intended that it be achieved. Where it is not currently practicable, the development of methods and technology that will make prevention practicable is encouraged.

The Groundwater Protection Act (Minnesota Statutes, section 103H.275) lays out a framework for the response to the identification of contamination and introduces the concept of Best Management Practices (voluntary) and Water Resource Protection Requirements (regulatory), key components of the Nitrogen Fertilizer Management Plan:

(a)... If groundwater pollution is detected, a state agency or political subdivision that regulates an activity causing or potentially causing a contribution to the pollution identified shall promote implementation of best management practices to prevent or minimize the source of pollution to the extent practicable. (b) The pollution control agency, or for agricultural chemicals and practices, the commissioner of agriculture, may adopt water resource protection requirements under subdivision 2 that are consistent with the goal of section 103H.001 and are commensurate with the groundwater pollution if the implementation of best management practices has proven to be ineffective.

Best management practices (BMPs) are voluntary and are defined in Minnesota Statutes. Section 103H.005, subdivision 4:

“Best management practices” means practicable voluntary practices that are capable of preventing and minimizing degradation of groundwater, considering economic factors, availability, technical feasibility, implementability, effectiveness, and environmental effects. Best management practices apply to schedules of activities; design and operation standards; restrictions of practices maintenance procedures; management plans; practices to prevent site releases, spillage, or leaks; application and use of chemicals; drainage from raw material storage; operating procedures; treatment requirements and other activities causing groundwater degradation.

Water resource protection requirements (WRPRs) may be adopted by the Minnesota Commissioner of Agriculture if the implementation of the BMPs has proven to be ineffective. The water resource protection requirements are defined in Minnesota Statutes, section 103H.005, subdivision 15:

... requirements adopted by rule for one or more pollutants intended to prevent and minimize pollution of groundwater. Water resource protection requirements include design criteria, standards, operations and maintenance procedures, practices to prevent releases, spills leaks and incidents, restrictions on use and practices and treatment requirements.

In summary, the NFMP is the state's blueprint for prevention or minimization of the impacts of nitrogen fertilizer on groundwater. By statute, the NFMP must include both voluntary components (BMPs) and provisions for the development of restrictions (WRPRs) if the implementation of the BMPs is proven to be ineffective.

THE MDA'S AUTHORITY TO PROTECT GROUNDWATER

The NFMP is intended to address nitrate in groundwater resulting from the legal application of nitrogen fertilizer. The MDA is the lead state regulatory agency in Minnesota for nitrogen fertilizer and has authority to regulate the use of nitrogen fertilizer, if necessary, to protect groundwater quality. The MDA does not have comparable authority to regulate the use of nitrogen fertilizer to protect surface water or for regulating the use of manure.

The Minnesota Pollution Control Agency (MPCA) is the lead state agency in responding to elevated nutrients including nitrate in surface waters and the lead agency for regulating the use of manure. The MPCA's responsibilities include monitoring and assessing water quality, listing impaired waters, and establishing Total Maximum Daily Loads (TMDLs). The NFMP will, to the extent practicable, align or integrate its processes with the impaired waters processes.

The NFMP supports the concept that surface water and groundwater be managed as holistically as possible. This can be done by integrating surface and groundwater strategies. Some activities such as promoting certain nitrogen BMPs might benefit both surface water and groundwater.

One area of potential concern is nitrate losses through subsurface agricultural tile drainage systems. Areas with tile drainage are generally artificially drained because they have heavy soils with poor internal drainage, and tend to be less prone to nitrate leaching to the groundwater. It is likely that most areas with a significant amount of tile drainage will not be a high priority for a localized response to groundwater contamination.

1990 PLAN IMPLEMENTATION SUMMARY

Many aspects of the NFMP have been implemented since the plan was first developed in 1990. These include:

- The MDA, the University of Minnesota, and numerous partners have developed, promoted and evaluated the effectiveness of the BMPs;
- Survey tools to evaluate adoption of the BMPs have been developed and successfully implemented;
- Low cost methods for groundwater monitoring and potable well testing have been developed and applied;
- Pilot response strategies including field demonstrations, educational events, and some pioneer approaches with land use changes within early Wellhead Protection Areas (public groundwater suppliers).

Partnerships with other agencies, Soil and Water Conservation Districts and other organizations have been developed or strengthened. A general approach to implement local response activities outlined in the NFMP has been tested and refined at several locations, particularly in wellhead protection areas, with

some important successes. On the other hand, some parts of the 1990 NFMP were not fully implemented due to limited program funding.

REVISION OF THE 1990 NFMP

In 2010, the MDA began a process to revise the 1990 NFMP to reflect current agricultural practices and activities, apply lessons learned from implementation activities and other work, and to better align it with current water resource conditions and program resources.

In 2011, the MDA assembled an Advisory Committee with 18 members, including three members from the original Task Force. The MDA hosted eighteen Advisory Committee meetings between 2011 and 2012 to review information related to the nitrogen cycle, nitrate contamination of ground and surface water, hydrogeologic conditions, crop production, nitrogen management, nitrogen research, and implementation. They also received an overview of the status of existing state and federal programs. The Committee, after reviewing information and considering expert testimony, made recommendations about the plan structure, content, and roles.

The revised NFMP is based on information and recommendations gathered from the following sources:

- Input from the NFMP Advisory Committee (primary source);
- Past NFMP implementation experience;
- Existing FANMAP and NASS survey information;
- Nebraska's Central Platte Natural Resources District phased approach to groundwater management;
- The MDA's Pesticide Management Plan;
- More detailed documentation of nitrate concentration levels in groundwater and drinking water standard exceedances; and
- Advances in agricultural technology and management practices.

A draft revised NFMP was completed by the MDA in August 2013. The MDA then conducted a public comment period including six listening sessions across Minnesota to solicit public review and comment on the draft between August and November 2013. The MDA received 32 formal comments from a variety of stakeholders and replied to the comments in two response documents. Based on stakeholder input, the draft NFMP was finalized and approved by the Minnesota Commissioner of Agriculture on March 26, 2015.

It is the intent of the MDA to review and revise the NFMP every ten years or more frequently if needed in order to ensure that it remains current. The revision process will be initiated by the MDA.

CONCEPTUAL GOALS OF THE NFMP

The MDA has incorporated a number of practical and conceptual goals into the revised NFMP. These goals have been developed from past experience working on implementation activities in the field; feedback from cooperators, farmers, crop advisors and agricultural professionals; and ongoing interagency planning and coordination efforts. The goals include:

1. Build upon lessons learned over the past 20 years in implementing the original NFMP. Examples of these lessons come from the process developed by the MDA for responding to local nitrate problems which includes: using a single credible contact person for all interactions with farmers; adopting field tested survey tools for evaluating local on-farm nutrient management practices; involving crop advisors and farmers in a primary role for developing solutions; forming local advisory teams with farmers, local government and other local stakeholders; and following the MDA protocols for low cost approaches for local groundwater monitoring to determine nitrate trends. A discussion of lessons learned is presented in Appendix A: MDA Lessons Learned in Responding to Elevated Nitrate in Groundwater. Three case studies are presented in Appendix B: City of Perham, City of St. Peter, Lincoln-Pipestone Rural Water.
2. Provide clear guidance and direction when establishing key decision-making steps of the NFMP.
3. Support and be aligned with other state water plans and programs, and capitalize on existing resources and activities. Examples include the Minnesota Department of Health (MDH) wellhead protection program; the MPCA watershed restoration and protection strategy; the Department of Natural Resources (DNR) efforts to develop groundwater management areas, and the Board of Water and Soil Resources (BWSR) comprehensive local water management program.
4. Consider the potential for unintended environmental consequences due to interactions between agricultural practices and surface and groundwater.
5. Provide guidance, strategies, and tools to maximize implementation efforts by local government.
6. Outline approaches to engage farmers, land owners, government and other stakeholder groups in resolving nitrate problems in local groundwater.
7. Be executed effectively given available MDA staff and resources.
8. Provide direction to the MDA for prioritizing the use of available staff and resources.
9. Support decision making based on factual information, particularly with respect to characterizing local agricultural practices and using this data to develop farm specific recommendations for protecting groundwater and to obtain funding for implementing these recommendations.
10. Have a significant emphasis on prevention. Once groundwater is contaminated, it can be extremely difficult, expensive and very slow to remediate.
11. Consider strategies that go beyond the BMPs in targeted high risk areas. It is recognized that the nitrogen fertilizer BMPs may not reduce nitrogen losses sufficiently to achieve groundwater quality goals in some highly vulnerable areas. Potential strategies include using new technologies, continuous cover and/or retiring land, for example.

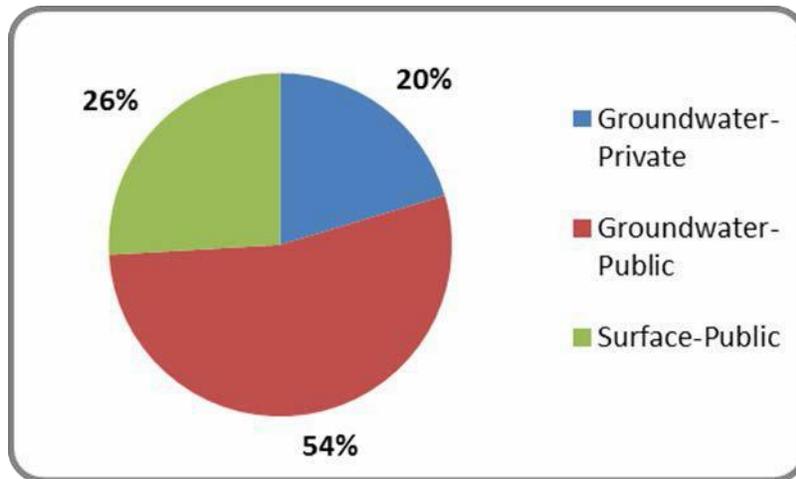
STRUCTURE OF THE NFMP

The NFMP is organized into ten chapters. Chapter one provides a general introduction to the NFMP. Chapters two through six include background and technical information about nitrogen and groundwater. Chapters seven through ten outline the revised NFMP process, with detailed information about prevention, monitoring and assessment and mitigation. Appendices A-J supplement the chapter material.

Chapter 2 : Impacts of Nitrate Contamination

Water contamination from nitrate presents a potential health risk to human populations which rely on it for drinking water. Approximately 75% of Minnesotans (4 million) rely on groundwater for their drinking water (Figure 1). These residents are served by either private wells or public water supplies. If elevated nitrate levels are detected in drinking water, there may be an increased probability that other contaminants, such as bacteria or pesticides, may also be present. Livestock and aquatic ecosystems may also be impacted by nitrate contaminated groundwater.

Figure 1. Drinking Water Sources in Minnesota



PUBLIC HEALTH RISKS

The U.S. Environmental Protection Agency (EPA) has established a drinking water standard of 10 milligrams per liter (mg/L) nitrate-nitrogen (nitrate) for public water supply systems. The MDH uses the EPA standard as a state Health Risk Limit (HRL) for public water supply systems, and as a guideline for private drinking water systems (MDH 1998). The drinking water standard has been established to protect against adverse human health impacts from ingesting the water, including methemoglobinemia, or “blue baby syndrome.”

Elevated nitrate in drinking water poses a risk to infants less than six months of age. Nitrate is reduced to nitrite in the gastrointestinal tract of infants (the high pH characteristic of the infant gastrointestinal system permits nitrate-reducing bacteria to thrive). The nitrite is then absorbed into the blood stream where it reacts with hemoglobin (oxygen carrying molecule) to produce methemoglobin, thus impairing the blood's ability to carry oxygen. Infants afflicted with methemoglobinemia actually suffer from an oxygen deficiency, and consequently their extremities may become blue, particularly around the eyes and mouth. If nitrate levels in the water are high enough and prompt medical attention is not received, death can result.

As an infant ages, its stomach acidity increases, reducing the numbers of nitrite-producing bacteria. After six months the conversion of nitrate to nitrite in the stomach no longer occurs. Most adults can consume large amounts of nitrate with no ill effects. In fact, the average adult in the U.S. consumes about 20-25 milligrams of nitrate every day in food, largely from vegetables (Carpenter 2012). Pregnant women,

people with reduced stomach acidity, and people with certain blood disorders may be susceptible to nitrate-induced methemoglobinemia.

The MDH uses the following classification system to evaluate human health impacts on nitrate (expressed as mg/L NO₃-N) concentrations in groundwater:

- Background: Less than 1.0 mg/L – assumed to represent natural background nitrate concentration (ambient conditions without human impact);
- Transitional: 1.0 to less than 3.0 mg/L – transitional nitrate concentrations that may or may not represent human influence;
- Elevated: 3.0 to less than 10 mg/L – may indicate elevated nitrate concentrations resulting from human activities; and
- Exceeding standards: 10 mg/L and higher – exceeds nitrate drinking water standards for public and private drinking water supplies.

LIVESTOCK HEALTH RISKS

Livestock can also be affected by ingesting high levels of nitrate present in certain plants or drinking water. However nitrate poisoning is usually associated with animals ingesting forage or feed containing high nitrate. Ruminants (cattle, goats and sheep) are most susceptible to nitrate, whereas horses and pigs are more resistant (Aiello 2012). Nitrate in plants or water is converted by the digestion process to nitrite, and in turn the nitrite is converted to ammonia. The ammonia is then converted to protein by bacteria in the rumen. If ruminants rapidly ingest large quantities of plants that contain very high levels of nitrate, nitrite will accumulate in the rumen. Nitrite is absorbed into the animal's red blood cells and combines with hemoglobin to form methemoglobin. Methemoglobin cannot transport oxygen as efficiently as hemoglobin, so the animal's heart rate and respiration increases, the blood and tissues of the animal take on a blue to chocolate brown color, muscle tremors can develop, staggering occurs, and the animal eventually suffocates. This is commonly called "nitrate poisoning."

Although usually short term, the effects of nitrite or nitrate toxicity may exist long term and are reported to include retarded growth, lowered milk production (cows), vitamin A deficiency, minor transitory goitrogenic effects, abortions and fetotoxicity, and increased susceptibility to infection (Aiello 2012). Chronic nitrate toxicosis remains a controversial issue and is not as well characterized, but most evidence does not support allegations of lowered milk production in dairy cows due to excessive dietary nitrate exposure alone.

Groundwater can be a potential source of toxic levels of nitrate for livestock if it becomes contaminated. The National Academy of Sciences set the guideline for the safe upper limit of nitrate-N in water at 100 mg/L for livestock (National Academy of Sciences 1974).

RISKS TO AQUATIC ECOSYSTEMS

Many of Minnesota's streams, lakes, and wetlands (surface waters) depend on the inflow of groundwater to maintain water levels, pollution assimilative capacity, and temperature. Aquatic life in surface waters receiving nitrate contaminated groundwater may be at risk. Research shows that nitrate can be toxic to certain aquatic life at concentrations lower than values found in some surface waters of the state. The MPCA is currently developing nitrate surface water quality standards to address aquatic life toxicity.

Eutrophication, or the growth of plant biomass due to excess nutrients, potentially threatens the health of aquatic ecosystems. When aquatic plants die and decay, bacteria use the oxygen in the water leaving inadequate amounts for the needs of other aquatic organisms. While nitrogen is not usually considered to be the nutrient which controls the extent of plant growth in Minnesota lakes or streams, it can contribute to eutrophication of downstream coastal waters, such as the Gulf of Mexico. When excessive nutrients from the Mississippi River reach the Gulf of Mexico, a “dead zone” or area of hypoxia or low dissolved oxygen develops (MPCA 2014).

DRINKING WATER TREATMENT COSTS OF NITRATE CONTAMINATION

Preventing nitrate contamination from occurring in drinking water supplies is typically much more cost effective than removing the contamination. Private and public well nitrate contamination problems can be mitigated through a variety of solutions. The University of Minnesota conducted two studies in 2006 to determine how private and public well owners respond to elevated nitrate and to quantify their costs (Lewandowski et al. 2008). The following sections on public and private wells provide information on the results of the two studies.

PUBLIC WELL STUDY

Seven Minnesota community water supply managers were interviewed in the summer of 2006 (Lewandowski et al. 2008). The managers were sent extensive questionnaires, and then they participated in open-ended, in-person interviews to clarify answers to the questionnaire and to discuss wellhead protection issues.

The study found that public water suppliers can take one or more of the following actions to address elevated nitrate in their wells: 1) install a new well(s) in a non-vulnerable location if there is sufficient quality and quantity of water available; 2) blend existing water supplies; or 3) remove nitrate in existing water supplies (treatment). The following describes each of these actions in greater detail:

- **Install a new well:** In some cases, a new well may need to be installed in a deeper, uncontaminated aquifer. Siting, construction and pumping costs associated with these new wells can frequently double the water cost to the customer. According to the study, installing a new well can cost a community \$75,000 to \$500,000 depending on depth and size of the well. Deep aquifers contain older water, which frequently contains high levels of iron, manganese, sulfur, or other elements. The costs associated with the removal of these elements must also be considered.
- **Blend:** Water suppliers commonly “blend” water from wells with higher and lower nitrate concentrations to provide drinking water with nitrate levels below the safe drinking water standard. However some communities currently do not have the proper facilities to blend water.
- **Treatment:** Nitrate removal (treatment) may be the only feasible option in situations where adequate quantity or quality of water is not available. In many cases, the study found that the installation and maintenance of municipal nitrate removal systems has increased the cost of water delivery by fourfold or more. This translates into \$100 to \$200 in increased water costs per customer per year. Nitrate removal systems used by public water suppliers include:
 - **Reverse Osmosis Process** - Pressure forces water through a semi-permeable membrane leaving behind most contaminants and a portion of the rejected solution. The membranes

need to be replaced on a regular basis. Typically, reverse osmosis can reduce nitrate by 85 to 95% but actual removal rates vary depending on the initial water quality, system pressure, and water temperature.

- Anion Exchange Process - An anion exchange system works by passing contaminated water through a resin bead filled tank. The resin is saturated with chloride, which chemically trades places with the similarly charged nitrate ion. Eventually the resin needs to be recharged by backwashing with a sodium chloride solution. The presence of sulfates can reduce the efficiency of the nitrate removal.

PRIVATE WELL STUDY

In 2006, a survey of private well owners in the 11 county “Central Sand Plains” area of Minnesota was conducted (Lewandowski et al. 2008). The objective of the study was to quantify actual amounts spent by private well owners when nitrate levels were elevated, regardless of whether the owners were aware of the contamination. The survey included questions about well characteristics, nitrate testing, and costs of actions taken in response to elevated nitrate concentrations, if identified.

Of the 483 returned surveys, the study concluded that 1) at least 33% of the wells could be considered susceptible to contamination because they were of sand point construction, more than 30 years old, or less than 50 feet deep; 2) at least 40% of the wells could be considered less susceptible because they were drilled and either less than 15 years old or greater than 100 feet deep; 3) nitrate concentrations did not differ among the well types, but the odds of elevated nitrate concentrations were significantly higher in wells where the principal land use within one-quarter mile was agricultural (cropland, pasture, and grassland).

Private well owners with a nitrate contaminated well have several options: 1) install a new well; 2) remove nitrate in existing well; or 3) buy and use bottled water. According to the study, the average remediation costs for private well owners were \$190 per year to buy bottled water, \$800 to buy a nitrate removal system plus \$100 per year for maintenance, and \$7,200 to install a new well. Homeowners must drill deeper wells in high nitrate areas in order to avoid nitrate contaminated groundwater. The cost of installing a new well is based on the depth (linear foot) of the well, which can be cost prohibitive.

Chapter 3 : Groundwater Contamination and Vulnerable Areas

The susceptibility of an area to groundwater contamination is referred to as the "sensitivity" of the region. Several environmental factors determine the sensitivity of an area, including 1) physical and chemical properties of the soil and geologic materials, 2) climatic effects, and 3) land use. These factors vary widely throughout Minnesota, making sensitivity very site-specific.

Further complicating the nature of sensitivity is nitrogen mobility. The dominant pathways for nitrogen movement include plant uptake, volatilization (gaseous losses as ammonia or as nitrogen gas through denitrification), adsorption, leaching below the root zone, and surface runoff. The prevailing environmental and management conditions at a given site may favor one of these pathways over another. For example, sandy soils may lose nitrogen primarily through leaching while heavy, poorly drained soils may lose nitrogen mainly through denitrification.

PHYSICAL AND CHEMICAL PROPERTIES OF SOIL AND GEOLOGICAL MATERIALS

The primary geologic, soil and biochemical factors affecting groundwater susceptibility to contamination are:

Depth to Groundwater: The depth to groundwater directly affects the time required for the nitrate to travel from the root zone to groundwater. Shallow groundwater has a greater potential for contamination compared to deep groundwater.

Soil Characteristics: Soil texture, structure, organic matter content and bulk density contribute to the amount of nitrate that is available to leach to groundwater and the ease with which it can leach. The presence of channels from earthworms or plant roots, or cracks within the vadose zone may also influence the flow of water. These characteristics vary with parent material type. For example, soils with a high sand content tend to have low organic matter, large pore sizes and high permeability. All of these factors increase water infiltration and nutrient leaching.

Vadose Zone Materials and Aquifer Materials: The unsaturated zone, often called the vadose zone, is the portion of the subsurface above the water table. It contains, at least some of the time, air as well as water in the pores.

Two properties of geologic materials determine the ability of aquifers to store and transmit water: porosity and permeability (Geologic Sensitivity Workgroup 1991). Porosity is the amount of space that is void in a material (rock or soil). Permeability is the measure of connections between the pore spaces. The greater the porosity and permeability, the shorter the time required for water to travel a given distance within the aquifer.

The presence of cracks and fissures can alter the ability of an aquifer to hold and transmit water. Special mention must be made of karst geology, which is a condition of fractured limestone bedrock and sinkholes. Karst areas are highly susceptible to groundwater contamination because the fractures and sinkholes act as conduits for rapid surface-to-subsurface movement of water and dissolved contaminants. These factors all vary widely throughout the state. In addition, these factors can vary significantly in a limited geographic area; because of this variability, maps such as those presented in this chapter can have limitations regardless of scale.

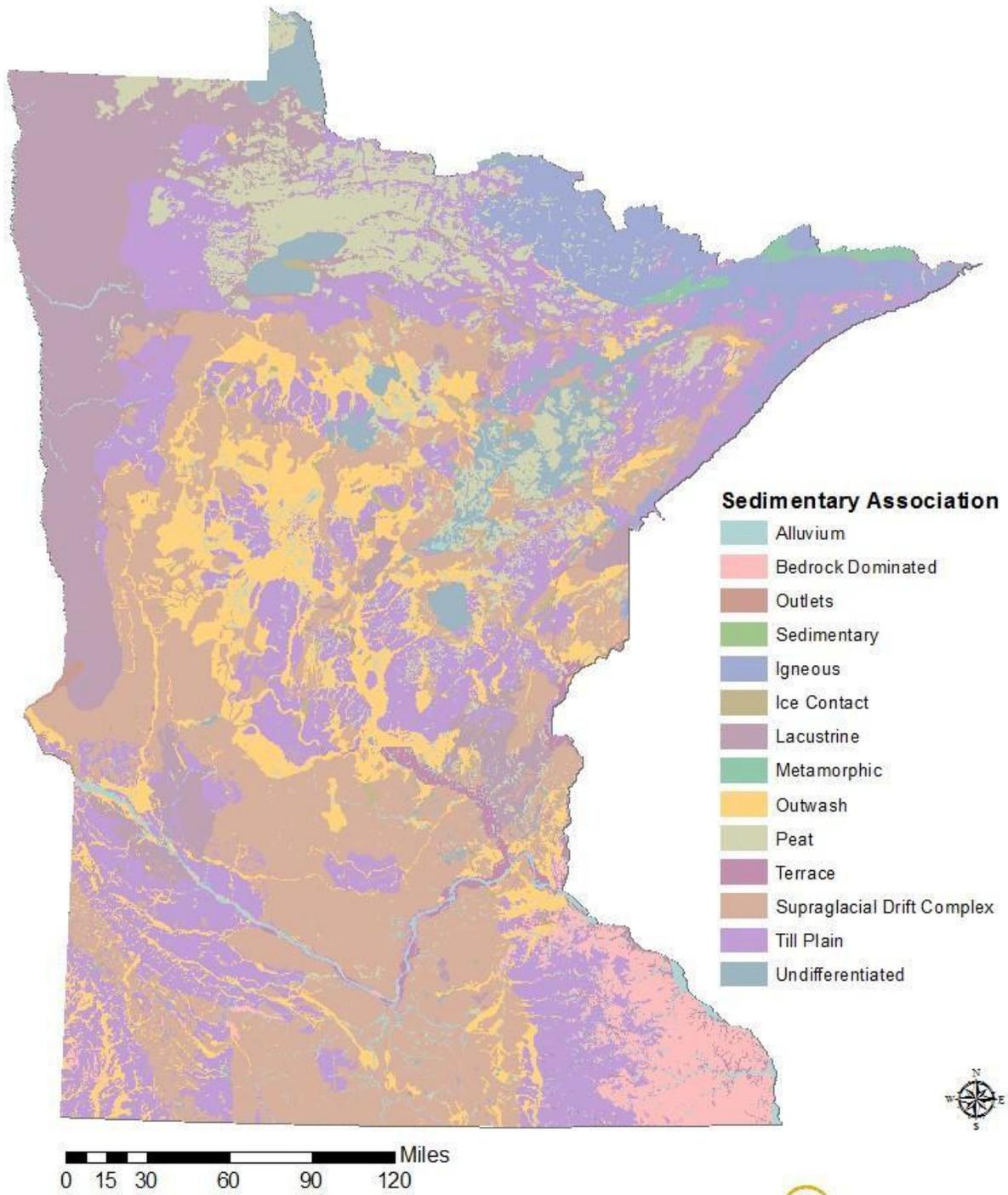
Denitrification: Denitrification is a process that can occur where there is organic matter but no oxygen present, such as under saturated conditions (e.g. in wetlands) or oxygen-free pockets within the unsaturated zone. During the denitrification process, bacteria remove nitrate by converting it to nitrogen gas. This makes the process an important factor to consider when assessing aquifer sensitivity and susceptibility to contamination. Shallow groundwater generally has low amounts of organic carbon so denitrification is limited. In some aquifers denitrification may be an important process with nitrate concentrations decreasing significantly and rapidly with increasing depth in the saturated zone.

TOOLS TO DETERMINE VULNERABLE AREAS IN MINNESOTA

There are various tools available to assess aquifer sensitivity. A statewide geomorphology GIS layer was produced by the Minnesota Geological Survey (MGS) and the University of Minnesota Duluth (UMD), providing an updated interpretation of geologic materials at a higher level of resolution than previous statewide maps (Minnesota DNR, UMD and MGS 1997). The geomorphology layer includes generalized categories of the sediments or bedrock types that are associated with landforms (Figure 2). The Sediment Association layer of the Geology of Minnesota was used to classify the state into aquifer sensitivity ratings. There are three ratings for aquifer sensitivity: low, medium and high (Figure 3). The ratings are based upon guidance from the Geologic Sensitivity Project Workgroup's report "Criteria and Guidelines for Assessing Geologic Sensitivity in Ground Water Resources in Minnesota" (Geologic Sensitivity Workgroup 1991). The high sensitivity rating is given to materials such as glacial outwash and bedrock associations. Glacial outwash, which is found extensively in Central Minnesota, contains sand and gravel with lesser amounts of fine grained materials. In Southeast Minnesota, the hydrogeology is dominated by limestone, dolomite and sandstone bedrock. Karst features and fractures in the bedrock create direct pathways from activities on the surface to groundwater and are vulnerable to contamination.

Other tools that may be used to understand aquifer sensitivity are the MGS and the DNR County Atlas – Regional Assessment Program, the MDH's Nitrate Probability Map Program and the Wellhead Protection Program.

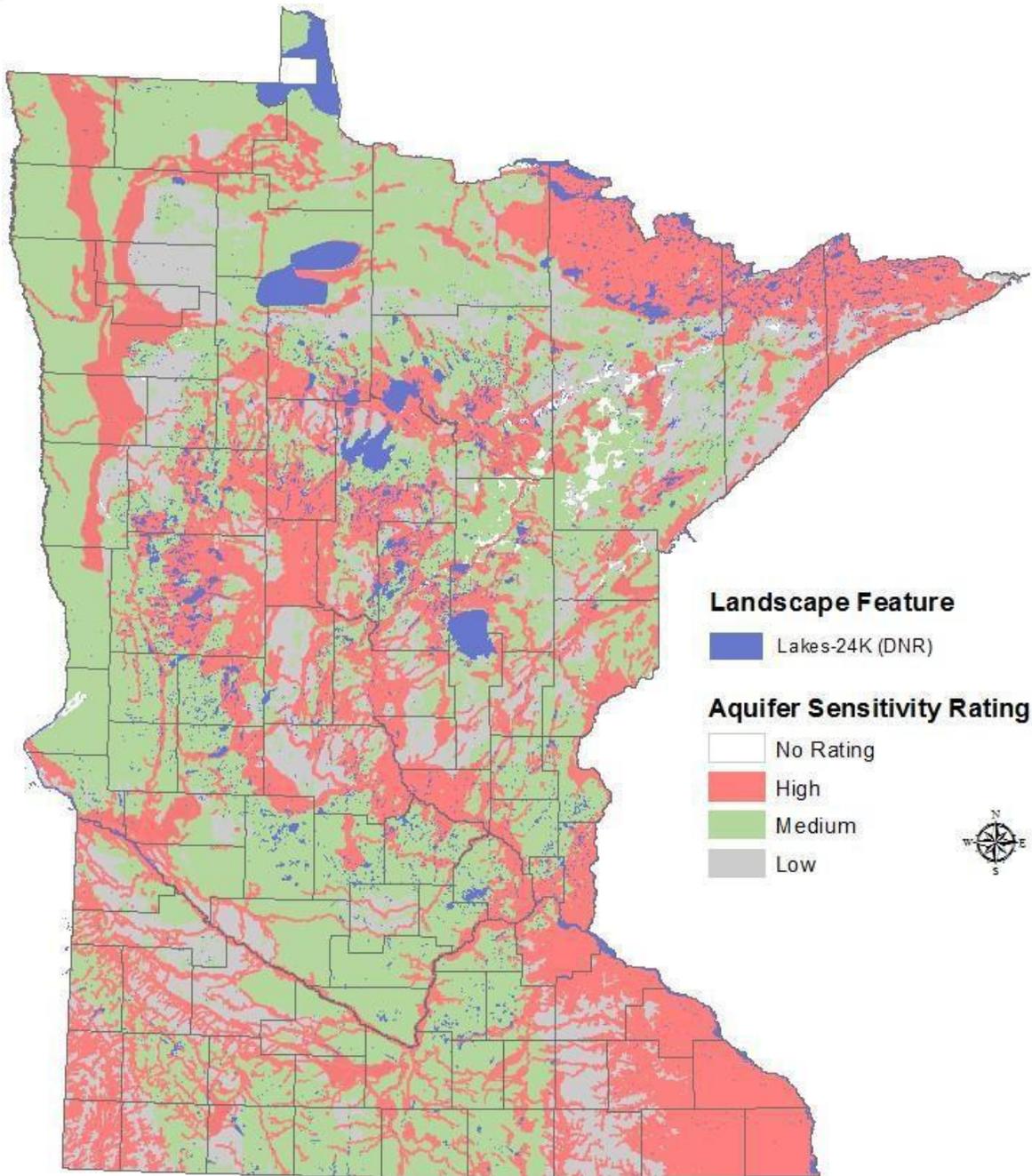
Figure 2. Geomorphology of Minnesota - sediment association (data source: DNR, UMD and MGS 1997)



Prepared by the Minnesota Department of Agriculture 2012



Figure 3. Water table sensitivity



0 15 30 60 90 120 Miles

Prepared by the Minnesota Department of Agriculture 2012



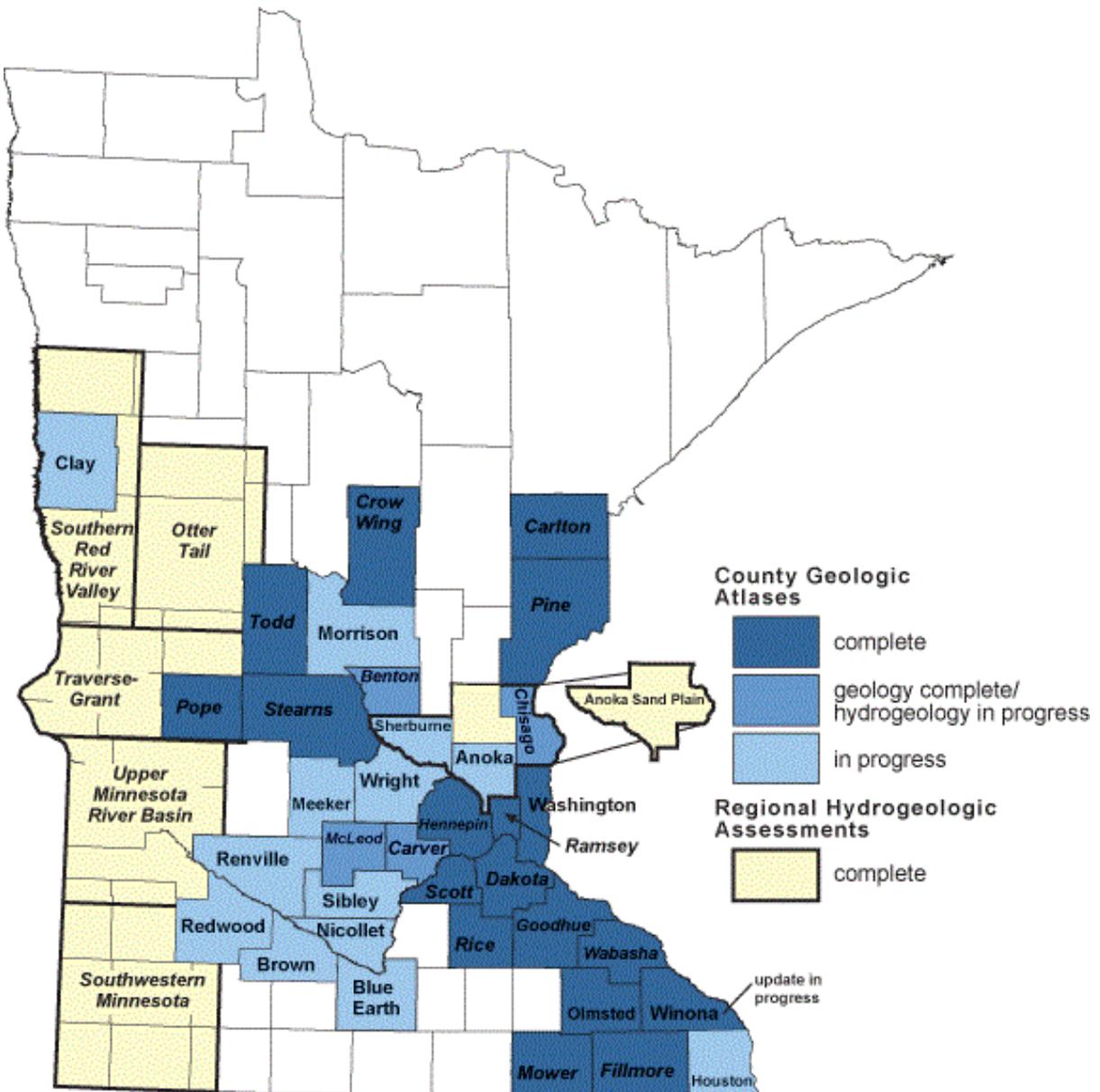
COUNTY GEOLOGIC ATLAS-REGIONAL ASSESSMENT PROGRAM

Together, the DNR and the MGS prepare map-based reports of counties ([County Geologic Atlases](#)) and multicounty regions ([Regional Hydrogeologic Assessments](#)) to convey geologic and hydrogeologic information and interpretations to governmental units at all levels, but particularly to local government. This information contributes to sound planning and management of the state's land and water resources (MGS 2012; DNR 2013).

County geologic atlases provide information essential to sustainable management of groundwater resources, for activities such as monitoring, water allocation, permitting, remediation, and well construction. They define aquifer properties and boundaries, as well as the connection of aquifers to the land and to surface water resources. The atlases also provide a broad range of information on county geology, mineral resources (including construction materials) and natural history.

A complete geologic atlas consists of two parts. Part A is prepared by the MGS and includes the water well database and 1:100,000 scale geologic maps showing properties and distribution of sediments and rocks in the subsurface. Part B is constructed by the DNR Division of Ecological and Water Resources and includes maps of water levels in aquifers, direction of groundwater flow, water chemistry, and sensitivity to pollution. Atlases are usually initiated by a request from a county and an offer to co-fund or provide in-kind service. The MGS is committed to the expeditious completion and periodic updating of atlases statewide (Figure 4) (MGS 2012).

Figure 4. Status of geologic atlases and regional assessments (DNR 2013)



NITRATE PROBABILITY MAPPING

The MDH has developed nitrate probability maps to assist in state and local water quality planning efforts. These maps identify areas with relatively high, moderate, and low probability of elevated nitrate concentrations in groundwater. The goal of nitrate probability mapping is to help protect public and private drinking water supplies and to prevent further contamination by raising awareness and assisting in local planning and prevention.

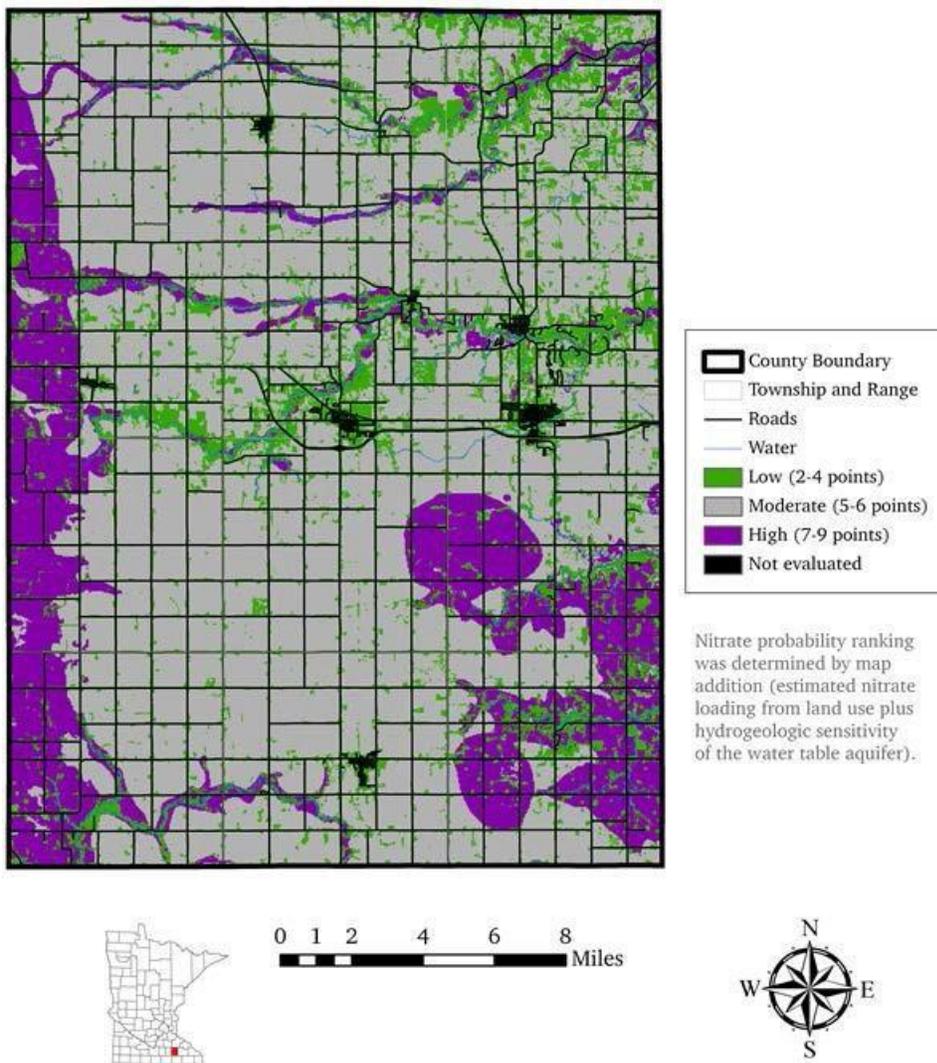
Wells with elevated nitrate concentrations will most likely be located in areas ranked as high or medium probability; however, wells in these areas also may provide drinking water without nitrate. Localized problems such as poor well construction, improper drainage, surface water entering the well bore, or onsite wastewater contamination, can lead to elevated nitrate levels anywhere in the state and may not be predicted using the probability maps.

Each probability map is accompanied by an explanatory report which describes the data layers used to develop the map. Figure 5 is a nitrate probability map created by the MDH for Dodge County in Minnesota.

To generate a nitrate probability map, the MDH uses geologic and soil data to produce a Geographic Information System (GIS) map depicting the hydrogeologic sensitivity of a water table aquifer. Next, the MDH uses cropland and urban land use data to generate a map of estimated nitrate loading to the subsurface. Finally, the hydrogeologic sensitivity and estimated nitrate-loading maps are compiled to create a nitrate probability ranking map.

The data layers used to prepare the map may vary between counties, as different databases are available for various counties. See the [MDH Nitrate-Nitrogen \(Nitrate\) Probability Maps and Reports](http://www.health.state.mn.us/divs/eh/water/swp/nitrate/nitratemaps.html) website to find a specific county:
<http://www.health.state.mn.us/divs/eh/water/swp/nitrate/nitratemaps.html>.

Figure 5. Nitrate probability map for Dodge County, Minnesota (Lundy 2011)



WELLHEAD PROTECTION

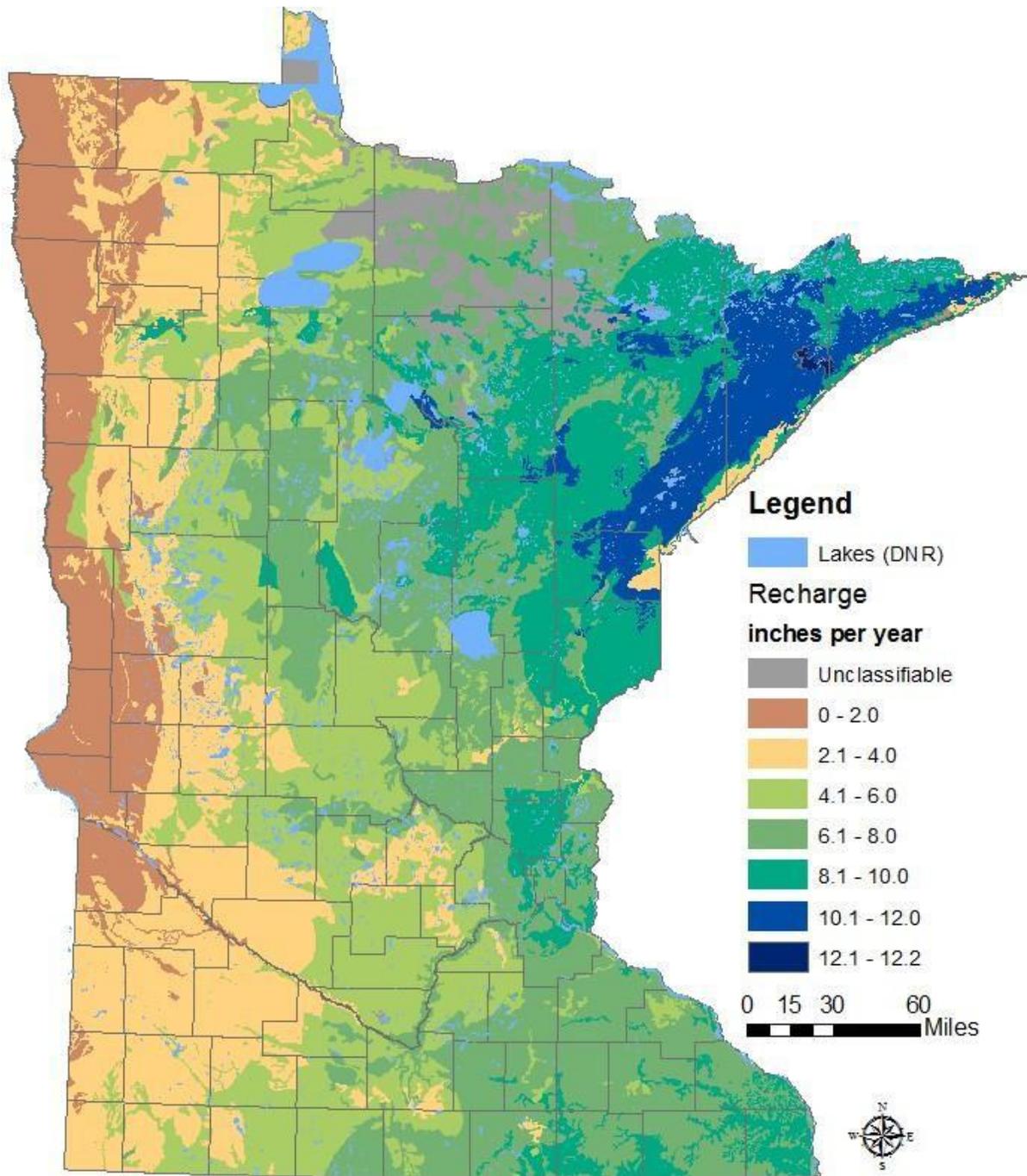
Wellhead protection programs are designed to protect groundwater that is used as a public water supply. States are required to have wellhead protection programs under the provisions of the 1986 amendments to the federal Safe Drinking Water Act. A capture zone for the well (called the wellhead protection area) is designated and a plan is developed for managing potential contamination sources within the wellhead protection area. The MDH assigns staff to assist public water suppliers with preparing and implementing wellhead protection plans. The MDH administers the state wellhead protection rule (Minnesota Rules, Part 4720.5100 - 4720.5590) that sets standards for planning.

CLIMATIC CONDITIONS AND GROUNDWATER RECHARGE

The term groundwater recharge describes the addition of water to the groundwater system. The timing and intensity of spring snowmelt, rain, and evapotranspiration during the growing season all play a role in the recharge process. Recharge may be altered by pumping, land use or climate changes resulting in increased or decreased recharge (Delin and Falteisek 2007).

Statewide estimates of annual recharge rates in Minnesota are based on the regional regression method (Lorenz and Delin 2007)(Figure 6). Recharge rates to unconfined aquifers in Minnesota typically range between 20 to 25% of the annual precipitation, recharge rates to glacial clays or till is typically less than 10% of precipitation and recharge to confined aquifers is typically less than 1% of precipitation (Delin and Falteisek 2007).

Figure 6. Annual recharge rate to surficial materials in Minnesota, 1971-2000 (Lorenz and Delin 2007)



*Estimated on the basis of the regional regression recharge method (RRR) as modified from Lorenz and Delin, 2007.

Prepared by the Minnesota Department of Agriculture, 2012



Chapter 4: Nitrate Conditions in Minnesota Groundwater

Monitoring provides information to resource managers and the public about nitrate concentrations and trends in groundwater. It is important to have sufficient, reliable data on groundwater quality in order to protect human health and to make appropriate land management decisions. Most results discussed in this section are from reports and data sets completed through 2012, with one through 2013. Additional assessment has been accomplished since then, and small summaries of those efforts are included at the end of this chapter.

To learn about the history of groundwater monitoring in Minnesota see Appendix C: History of Groundwater Monitoring in Minnesota; and Appendix D: Challenges of Monitoring Groundwater Quality.

NITRATE CONDITIONS IN VULNERABLE GROUNDWATER IN AREAS OF THE STATE UNDER AGRICULTURAL ROW CROP PRODUCTION

This section focuses on nitrate data collected from wells located in shallow, vulnerable groundwater aquifers in agricultural areas of the state. Due to the variation in geology and extent of Minnesota's groundwater resources, it is not practical to attempt a comprehensive evaluation of all the agriculture-related impacts on groundwater. It is also highly unlikely that the routine use of nitrogen fertilizer would significantly impact all of Minnesota's groundwater systems.

SHALLOW GROUNDWATER

To monitor in areas with shallow groundwater, nested groundwater wells are installed by the MDA in or near areas with row crop agriculture. Monitoring these areas aids in early detection if chemicals are present, and is considered a preventive and proactive approach to protecting Minnesota's waters.

MDA Nitrate Data Summary

The MDA's Monitoring and Assessment Unit provides information on impacts to the state's water resources from the routine application of agricultural chemicals. Although the MDA's current groundwater monitoring program was designed for pesticides, the MDA collects and analyzes samples for nitrate to provide information about the potential environmental impact to groundwater associated with agricultural activities in the state.

The MDA began monitoring in 1985 and developed a monitoring well network (referred to as the "former network") which consisted of monitoring wells, observation wells, and private drinking water wells that, depending on the region, were placed in either the Quaternary aquifer, till, or karst bedrock. This former network operated from 1987 to 1996. After 1996, the MDA completed a formal evaluation of its groundwater monitoring network and determined that many of the wells were, or soon would be, past their useful life span. Following three years of development, the MDA began installing a new network of monitoring wells starting in 2000 focused areas of the state (known as the Central Sands network or the current network). Most of the wells in the current network are located at the edge of fields, many of them irrigated, in shallow "water table" conditions. The Central Sands network consisted entirely of water quality monitoring wells designed to sample the very top portion of the shallowest aquifers in the state's major sand plain region. This current network was designed specifically as an early warning, edge of field monitoring network for pesticides. Nitrate concentrations in groundwater can vary significantly over short distances, short time frames and with changes in depth. It should be noted that this current network was

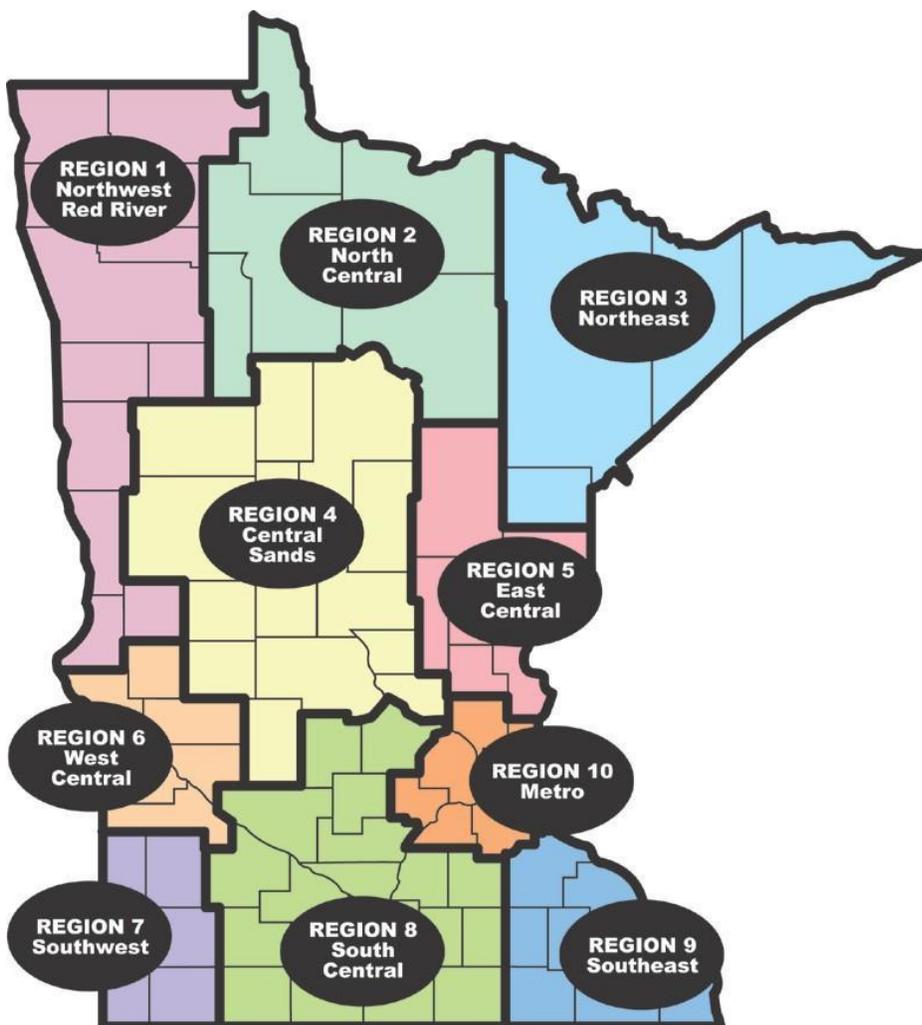
not designed to address this nitrate variability. To assess nitrate in groundwater, additional wells at multiple depths would be required. To learn more about designing a monitoring network to test for nitrate concentration, please refer to Appendix E: Evaluating the Presence of Nitrate-Nitrogen in Groundwater.

In 2004, the MDA groundwater monitoring program, with assistance from the University of Minnesota, established a regional monitoring network that divided the state into ten regions. These regions were developed to facilitate water quality monitoring efforts, pesticide management, and BMP development, promotion, and evaluation. These regions were termed Pesticide Monitoring Regions (PMRs) (Figure 7).

PMR's 4, 9, and 10 (urban) have unique monitoring designs based on their distinctive land use, hydrogeologic, or other important characteristics. Groundwater in PMR 9 has been sampled via naturally occurring springs since 1993 and private drinking water wells since 2009 (MDA 2009). PMRs 2 and 3 are not currently monitored for groundwater due to very limited agricultural production in these heavily forested regions.

To learn about nitrate trends in groundwater in springs, see Appendix F: Nitrate Trends in Groundwater at Selected Springs in Southeast Minnesota.

Figure 7. Minnesota Pesticide Monitoring Regions (MDA 2012b)



The MDA Nitrate Report Findings

In 2012, a report was completed that provided a summary of the MDA's nitrate groundwater monitoring activities through the Monitoring and Assessment Unit at the MDA (MDA 2012b). The nitrate data were compiled and analyzed on an annual basis by network (former versus current) for each region. The Central Sands area (PMR 4) and the Southeast karst area (PMR 9) were determined to be the most vulnerable to and the most impacted by nitrate contamination.

Nitrate data collected around the state showed that, when comparing the former and current networks, there was a significant step increase in nitrate concentration in a majority of the regions (Table 1). The reasons for this step change are not known and are likely to be varied but may be related to changing well locations and depth. Nitrate concentrations in the very shallow, highly vulnerable groundwater monitoring wells sampled in this program exceed the Health Risk Limit (HRL) at many locations. However, this is not the situation with every well or all of the regions monitored. There were many wells that have shown no detections or very low nitrate levels. Nitrate concentration data also showed significant fluctuation over both short-term and long-term time frames. In addition to the trends over time, there are significant spatial differences showing that concentrations and trends may be different between and within various monitoring regions.

Table 1. Summary of nitrate results from former and current MDA monitoring networks

Pesticide Monitoring Region	Former Network (1985-1996)				Current Network (2000-2013)			
	Detections/ # of Samples	% Detections	Median (mg/L)	% of samples above HRL	Detections/ # of Samples	% Detections	Median (mg/L)	% of samples above HRL
1	2/31	6	0	0	59/114	52	0.45	8
4	1150/1580	73	6.5	38	1582/1634	97	14.4	62
5	49/66	74	8.2	44	88/92	96	10.5	52
6	16/63	25	0	8	59/111	53	0.59	12
7	13/25	34	0	6	51/90	57	5.10	27
8	15/84	18	0	7	88/142	62	1.69	20
9	280/337	83	7.4	35	590/592	99	6.09	23

The detection method reporting limit for nitrate-nitrogen is 0.4 mg/L. This means all detections reported from the laboratory are at or above this level.

It should be noted again that the MDA's pesticide groundwater monitoring program was not designed to determine nitrate detection or concentration status and trends. These wells were constructed at the water table, and nitrate concentrations can change significantly with depth. The network does not represent concentrations in drinking water wells. Identification of the causes and factors involved in the changing trends in nitrate concentrations may require a different monitoring design dedicated to understanding nitrate in groundwater.

Figure 8 shows concentration over time in the Central Sands region of Minnesota in the former network (1985 – 1996). It indicates that monitoring well nitrate concentrations generally increased. The rate of increase was statistically significant in four out of the six trend tests performed on the former network (MDA 2012a). There was some nonseasonal fluctuation in the data. This fluctuation has occurred at all levels (median, 75th percentile, and 90th percentile).

Figure 8. Nitrate concentration time series from PMR 4 groundwater monitoring wells former network

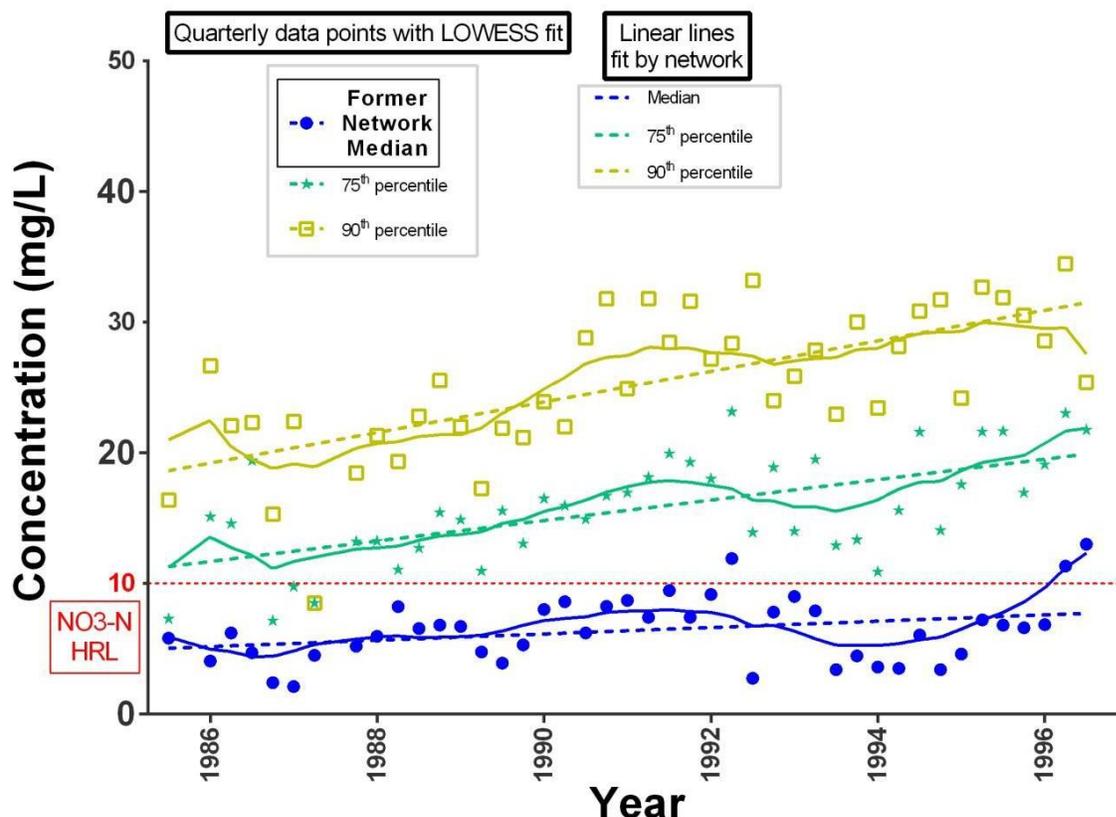
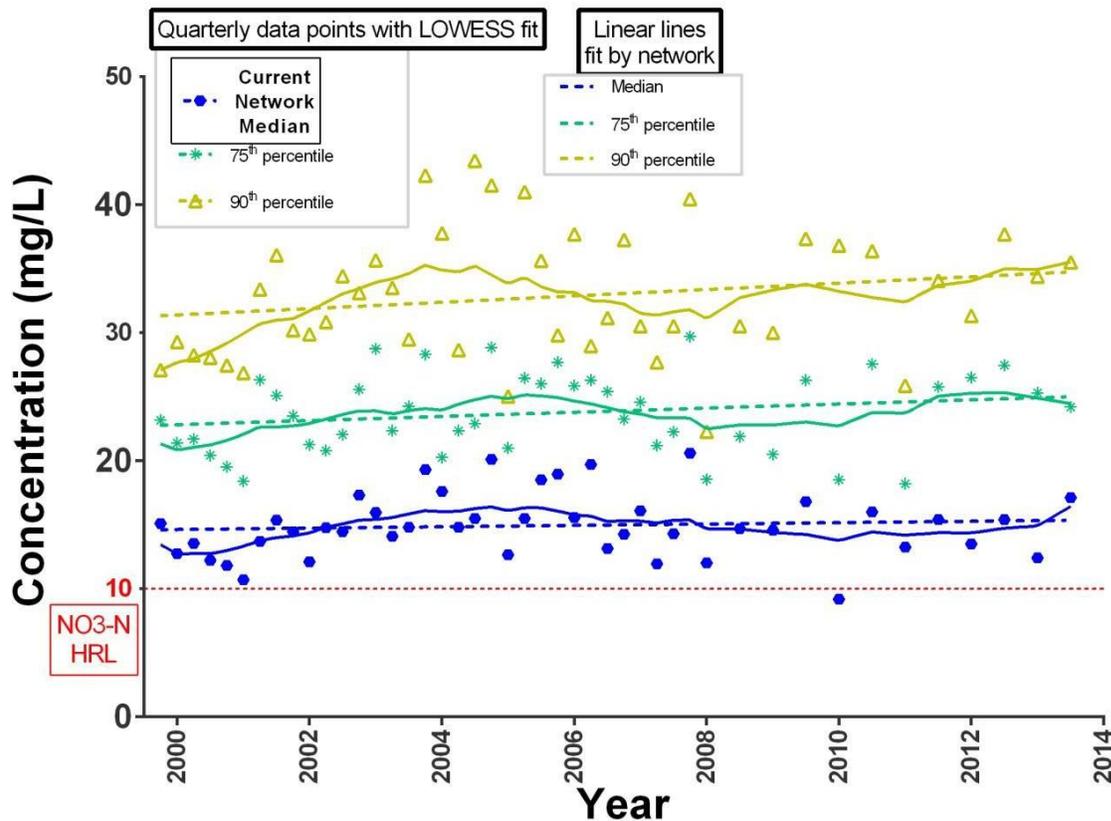


Figure 9 shows concentration over time in the Central Sands region of Minnesota in the current network (2000 - 2013). It suggests that monitoring well nitrate concentrations have generally increased since 2000. However, the rate of increase was not statistically significant in five out of the six trend tests performed on the current network (MDA personal communication 2014). It appears that the nitrate concentrations in the current network may have reached a maximum around 2005 and have dropped slightly since then, although there is significant annual variability in the data. Median nitrate concentrations in the current network were consistently higher than the HRL of 10.0 mg/L, whereas median concentrations in the former network were, in their majority, below the HRL. Due to the differences in these networks, data can not be extrapolated between the former and the current networks.

Figure 9. Nitrate concentration time series from PMR 4 groundwater monitoring wells current network



Sixty-two of samples from the MDA monitoring wells (PMR 4) were above 10 mg/L nitrate-N and only 14% of samples were below 3 mg/L (Table 2). The median concentration for the MDA PMR 4 monitoring wells was 14.4 mg/L while the CSPWN median concentration is 0 mg/L. The high nitrate concentrations observed in the MDA PMR 4 monitoring wells were not seen in the private drinking water wells.

Table 2. Nitrate-N concentration results summary for the MDA PMR 4 monitoring wells from 2000-2013

MDA PMR 4 Monitoring Wells	Nitrate -N Parameters							
	# Samples	Minimum (mg/L)	Median (mg/L)	75 th Percentile (mg/L)	90 th Percentile (mg/L)	Maximum (mg/L)	% ≤ 3 (mg/L)	% ≥ 10 (mg/L)
2000-2013	1,687	0.0	14.4	23.5	33.3	115	15	62

PRIVATE WELLS

MDA and partners have worked with private well owners to sample their wells for nitrates, and has found there can be significant variability in monitoring data in individual wells from year to year. In addition, participation by homeowners is voluntary and some may drop out or not provide samples some years. However the data is useful for evaluating long term trends and indicates a concern for nitrate in groundwater from vulnerable aquifers in central and southeast Minnesota.

SOUTHEAST VOLUNTEER NITRATE MONITORING NETWORK RESULTS 2008-2012

Drinking water quality is a concern across southeastern Minnesota, where nitrate loading to the subsurface can be significant and hydrogeologic sensitivity is highly variable within short distances. In 2008, the Southeast Minnesota Water Resources Board (SEMNRB), and several partners (MPCA, MDA, MDH) began collecting data from the “volunteer nitrate monitoring network” (VNMN). This region was selected as a pilot because of its vulnerable and complex geology.

This network of 675 private drinking water wells, representing a stratified-random distribution across the nine counties (Dodge, Fillmore, Goodhue, Houston, Mower, Olmsted, Rice, Wabasha and Winona) and several aquifers, was designed to provide nitrate concentration data.

Before data collection began, well network coordinators (county staff) enrolled volunteers (well owners) into the program by collecting detailed information about well location, well construction, and nearby nitrate sources. Volunteers collected six rounds of samples, between February 2008 and August 2012.

Based on the 3,245 samples collected and analyzed, the percentage of wells exceeding the HRL for each sampling round ranged between approximately 7.6 and 14.6% (Table 3) (MDH 2012; Aug. 2012-unpublished data from MDA).

Table 3. Median nitrate-N and wells exceeding the Health Risk Limit (HRL)

	February 2008	August 2008	February 2009	August 2009	August 2010	August 2011	August 2012
Median Nitrate-N (mg/L)	0.3	0.3	0.2	0.3	0.7	0.5	0.4
Exceed HRL (%)	14.6	11.4	11.1	11.0	9.3	10.4	7.6

The study evaluated several factors related to well construction and hydrogeology, and found them to influence groundwater quality. Well construction (the documented presence or absence of casing grout) and overlying geologic protection (shale or at least ten feet of clay above the open interval of the well) had the strongest influence on groundwater quality. Low nitrate concentrations were measured in 97.7% of wells with the most-desirable construction and hydrogeologic characteristics. The results are only applicable to the nine counties in the study area.

MDA CENTRAL SANDS PRIVATE WELL MONITORING NETWORK RESULTS 2011-2014

Due to the success of the southeast volunteer nitrate monitoring network, as well as the availability of newly acquired funding from the Clean Water Legacy Amendment, the MDA launched a similar project in the Central Sands area of Minnesota. The MDA determined that because high levels of nitrate have been measured in Central Sands monitoring wells, it was important to expand nitrate monitoring to private drinking water wells to determine if the concentrations were similar to concentrations found in the monitoring wells. In the spring of 2011, the MDA began the Central Sands Private Well Monitoring Network (CSPWN). The first goal of this project was to look at current conditions across the Central Sands region and the second long term goal was to determine long term nitrate concentration trends using a subset of this monitoring data

By July 1, 2011 the MDA had analyzed 1,555 samples for nitrate (MDA 2012a). Over 88% of the wells sampled had nitrate-N concentrations below 3 mg/L, 6.8% of the wells ranged from 3-10 mg/L of nitrate-N and 4.6% were greater than the nitrate-N HRL (Table 4). These results were similar to findings from a 2010 U. S. Geological Survey (USGS) report on nitrate concentrations in private wells in the glacial aquifer systems across the upper US (Warner and Arnold 2010). The USGS report found that less than 5% of sampled private wells had nitrate-N concentrations greater than or equal to 10 mg/L nitrate-N. Nitrate concentrations from the CSPWN 2011 results varied widely over short distances (Figure 10). This was also the case in the USGS report on glacial aquifer systems.

Table 4. Summary of nitrate-N concentrations for the Central Sands Private Well Network (2011)

	# of Samples	Minimum (mg/L)	Median (mg/L)	75 th Percentile (mg/L)	90 th Percentile (mg/L)	Maximum (mg/L)	% ≤ 3 (mg/L)	% 3-10 (mg/L)	% ≥10 (mg/L)
Average	1,555	<0.03	0.01	0.66	4.15	31.9	88.6	6.8	4.6

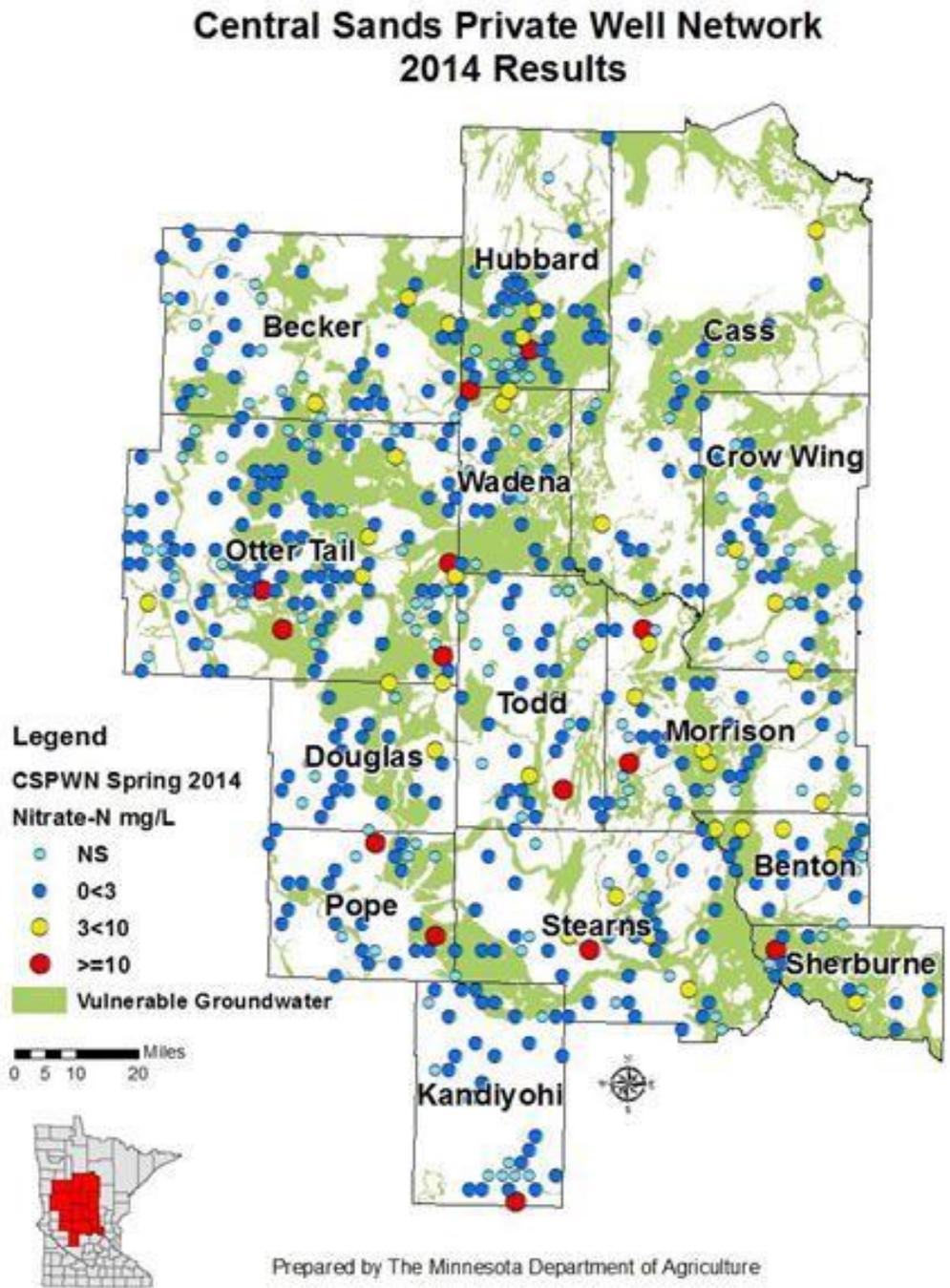
Starting in 2012, approximately 550 homeowners volunteered to participate in annual sampling of their private wells. Results from 2012 and 2013 indicated a similar response to 2011, with 89% of the wells in both years having less than 3 mg/L of nitrate-N concentration. 2014 results show: 89% of sampled wells were < 3 mg/L, 8% were 3-10 mg/L, and 3% were ≥10 mg/L. (Table 5). Work on this project is ongoing. For further information on this sampling project, see

<http://www.mda.state.mn.us/en/protecting/cleanwaterfund/gwdwprotection/characterizingnitrates.aspx>

Table 5. Summary of nitrate-N concentration results for the Central Sands Private Well Network (2011 – 2014)

		Sample Distribution by Year			
		2011	2012	2013	2014
Nitrate-N (mg/L)	Total # of Samples	534	510	487	434
0 < 3		478	454	433	388
3 < 10		35	40	41	32
≥ 10		21	16	13	14
Percent of Samples ≥ 10		4%	3%	3%	3%

Figure 10. Central Sands Private Well Network distribution of nitrate-N concentrations in individual wells



Analysis of well owner surveys demonstrates a relationship between nitrate concentrations and well construction type, well depth and to a lesser extent, well age. However, because well information was provided by the well owners, it may be approximate or erroneous.

The results are applicable to the Central Sands counties and are based on a one-time sampling event, used to determine areas of concern. The second stage of this project is to continue sampling approximately 600 wells on an annual basis to determine long term nitrate trends of nitrate concentrations.

PUBLIC WATER SUPPLY WELLS

MINNESOTA DEPARTMENT OF HEALTH DRINKING WATER INFORMATION SYSTEM DATABASE

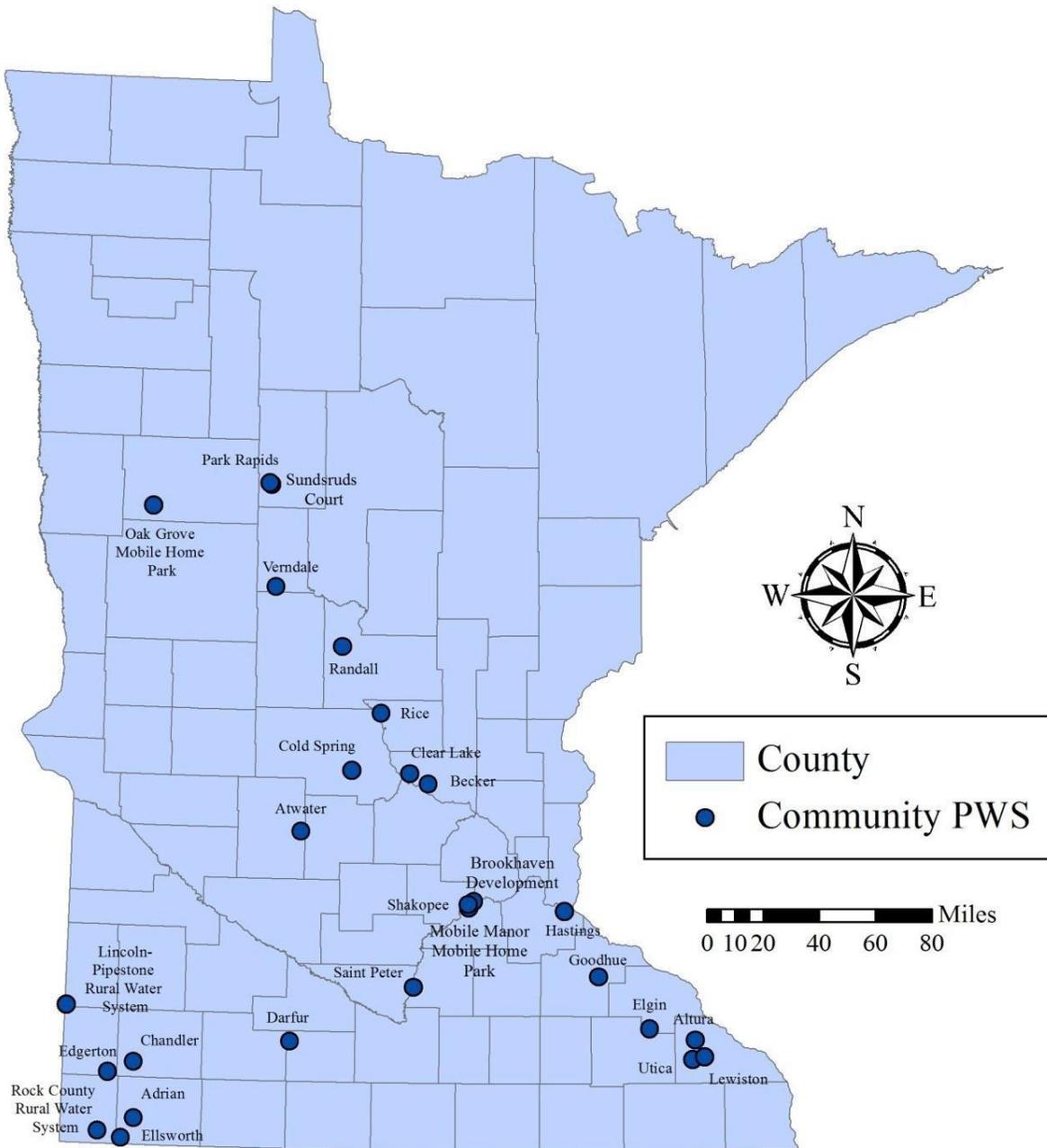
The MDH operates and manages the Minnesota Drinking Water Information System (MNDWIS) database, which stores and tracks information about each public water supply's distribution components (e.g. wells, treatment plant, water storage) and water quality monitoring and compliance data regulated by the federal Safe Drinking Water Act (SDWA). Presently, there are 7,091 PWS in Minnesota, ranging from churches, schools, day care centers, resorts, restaurants, mobile home parks, prisons, and municipal water supplies that provide drinking water to the public. Of the total PWS in Minnesota, 963 PWS are classified as "community" water suppliers in Minnesota (i.e., cities, prisons, schools). Most cities have multiple wells and any raw (source) water pumped from these wells that exceeds the HRL is either treated or blended with water having a lower concentration of nitrate in order to attain the standard prior to being distributed to users.

Nitrate is one of several annual general compliance contaminants required to be tested under the SDWA. Regulated monitoring and testing of a public water supply occurs after treatment or at the point where the water enters the distribution system and is available to the public for consumption. Raw water data also is available in MNDWIS. The same general contaminant information is required to be made public by the PWS through a "Consumer Confidence Report" so citizens have the opportunity to know about the quality of their drinking water.

To protect public health and help public water suppliers avoid exceeding the regulated contaminant levels under the federal SDWA, the MDH requires quarterly water quality monitoring when certain contaminant thresholds are reached. Public water suppliers are required to submit quarterly monitoring results when wells exceed 5.4 mg/L nitrate-N to more closely monitor, evaluate and identify ways to reduce nitrogen levels in their water supply. The goal in wellhead protection areas is to prevent the raw water from exceeding the drinking water standard. Also, all PWS that are treating for nitrate are required to continue to submit quarterly monitoring results to ensure the water produced for consumption is maintained below the drinking water standard of 10 mg/L nitrate-N. The MDA supports the MDH requirements to monitor wells that exceed 5.4 mg/L nitrate-N in PWS systems. This is the value at which additional monitoring is currently required under the SDWA.

There are presently 27 community public water supply systems that are conducting quarterly monitoring for nitrate (Figure 11). See Appendix B: Case Studies: City of Perham, City of St. Peter, Lincoln-Pipestone Rural Water to learn more about selected communities that the MDA and the MDH have worked with to address elevated nitrate in their PWS.

Figure 11. Community public water supply systems monitoring nitrate quarterly (MDH 2013)



Blue dots show locations for 27 community PWS (groundwater) systems currently monitored quarterly for exceeding 5 mg/L nitrate.

MINNESOTA DEPARTMENT OF HEALTHL WELL WATER QUALITY DATABASE (NEW WELLS)

Since 1990, when a new well is constructed, the well driller is required to collect a water sample and have the water tested by a certified lab for coliform bacteria and nitrate. Additionally a requirement to analyze for arsenic was added in 2008. The test results are provided to the property owner and also entered into the MDH Well Management “Wells” database. As described in the 2012 Clean Water Fund Performance Report, the percentage of new wells with nitrate-N exceeding 5 mg/L was around 2% over this twenty year period, and those wells exceeding the drinking water standard was around 0.5% (Minnesota Agencies 2012).

Twenty years of water quality data collected from newly constructed private wells shows that the percentage of new wells above 5 mg/L nitrate-N is small. It is important to note that the data does not account for differences in geology and aquifer vulnerability in Minnesota. The data also does not reflect the fact that well drillers will avoid drilling new wells in aquifers known to be contaminated by nitrate by drilling into deeper aquifers or different locations, therefore the dataset is of limited usefulness in tracking the impacts of nitrate on drinking water.

ADDITIONAL MONITORING RESOURCES AND REPORTS

MINNESOTA'S CLEAN WATER ROADMAP

Minnesota’s Clean Water Roadmap is a set of goals for protecting and restoring Minnesota’s water resources during the 25-year life of the Clean Water, Land and Legacy Amendment. This document was created through a collaborative process with an interagency team made up of personnel from seven agencies (BWSR, MDH, MPCA, MDA, DNR, MN Public Facilities Authority, and the Metropolitan Council). The MDA will work together with the other agencies to help achieve the indicators set forth. One of the four high-level indicators describes goals for groundwater quality. The statewide 2034 goal for drinking water standards for nitrate is to reduce nitrate levels in groundwater by 20%, which will decrease the percentage of wells exceeding the drinking water standard by approximately 50%.

TOWNSHIP TESTING PROGRAM

The MDA has established a Township Testing Program to determine current nitrate concentrations in private wells on a township scale. This program is discussed in Chapter 9.

Chapter 5 : Nitrogen Cycle, Sources and Trends

This chapter is a simplified version of Appendix G: Nitrogen Cycle, Sources and Trends.

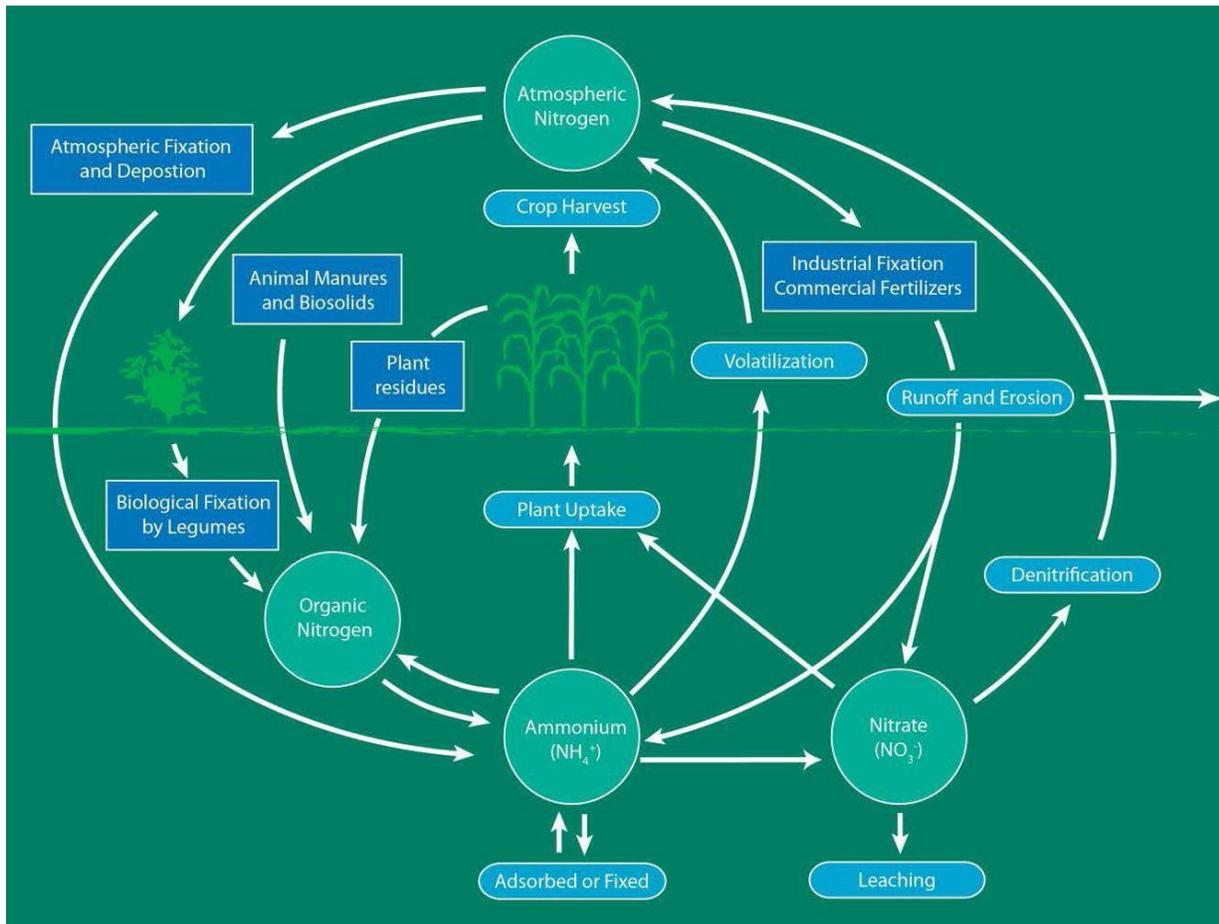
THE NITROGEN CYCLE AND TERMINOLOGY

The behavior of nitrogen (N) in the environment is governed by a complex set of interrelated chemical and biological transformations. These reactions are summarized in the “nitrogen cycle”. The nitrogen cycle, depicted in Figure 12, describes the inputs, pools, pathways, transformations, and losses of nitrogen in the environment.

Although several nitrogen species are involved in the cycle, the species which are of primary importance in the soil are nitrate-nitrogen (NO_3^-), ammonium nitrogen (NH_4^+), and organic nitrogen. Nitrogen in the nitrate form is highly water soluble and extremely mobile posing economic and environmental concerns. The characteristics of these species and related processes are summarized in Appendix G.

Two notes should be made on the subject of nitrogen sources. First, all nitrogen sources perform the same function in the context of the nitrogen cycle, although they may enter the cycle at different points. This means that all nitrogen sources are potential nitrate sources and could contribute to groundwater contamination. Secondly, it is important to recognize that nitrate occurs naturally in the soil system. Nitrate losses, although typically minor, can occur under natural vegetative conditions. Losses, although generally temporal, can be much higher after major events such as prairie fires, land clearing and/or disturbances, and the initiation of major tillage operations. Significant losses can also occur after extended drought conditions following by prolonged wet cycles.

Figure 12. The nitrogen cycle (Lamb et al. 2008)



AGRONOMIC AND EXTERNAL SOURCES OF NITROGEN

In a recent report, it is estimated that the statewide balance of inorganic nitrogen is 2.7 million tons per year (Figure 13) (MPCA 2013). Eighty percent of those contributions are applied on or derived from Minnesota's cropland. Contributions from soil organic matter, fertilizer, manure and legume crops are very important inputs for optimizing yields and it is imperative that these inputs are managed to minimize environmental impacts (Figure 14). Nitrogen sources to cropland are highly diverse and relative contributions vary substantially on both regional and local scales. It would be highly relevant to conduct similar types of nitrogen source contribution assessments to specific areas of Minnesota where groundwater supplies are either impacted or threatened by excessive nitrogen loading.

Figure 13 illustrates the major sources of nitrogen inputs to Minnesota cropland from a statewide perspective. It is important to note that the relative percentage from any category may not directly relate to amounts reaching groundwater or surface waters. Some processes, such as mineralization, can only be managed or manipulated to a small degree. Key nitrogen sources that can be managed to a significant degree include: fertilizer (through selection of proper rates, sources, timing, etc.), manure (proper crediting, rates, incorporation, etc.) and legumes (crediting).

Figure 13. Major sources of nitrogen inputs to Minnesota soils (MPCA 2013) Note that categories for soil mineralization denote “net” mineralization on an annual basis

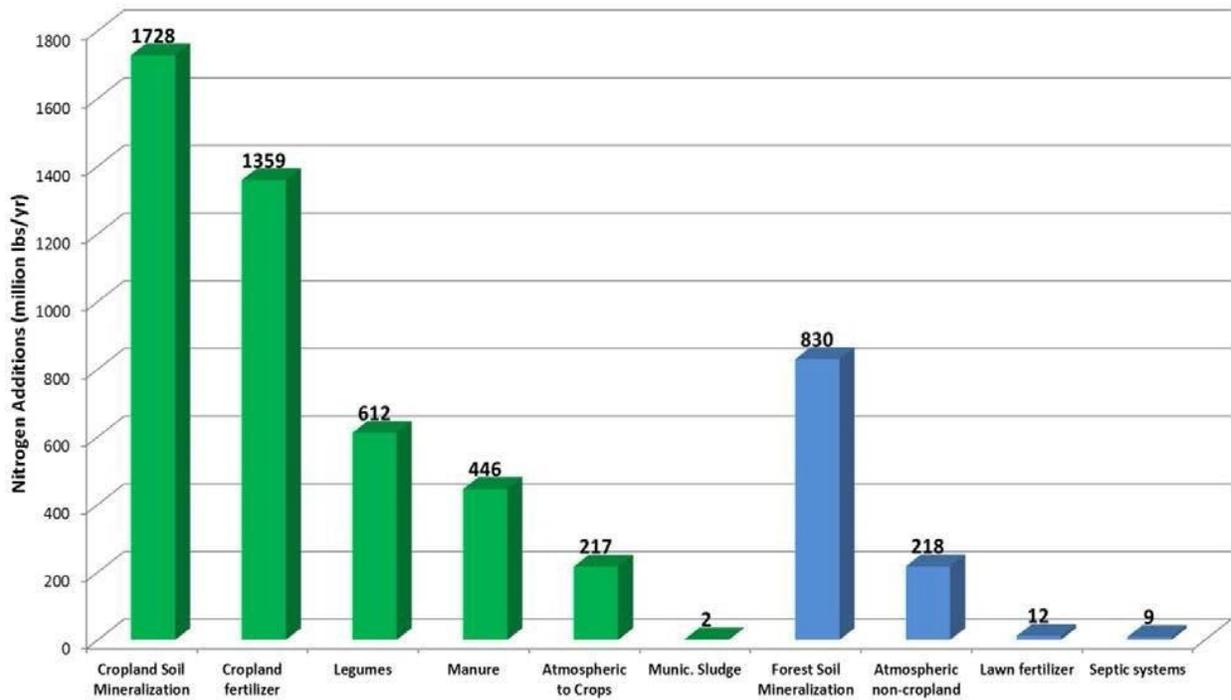
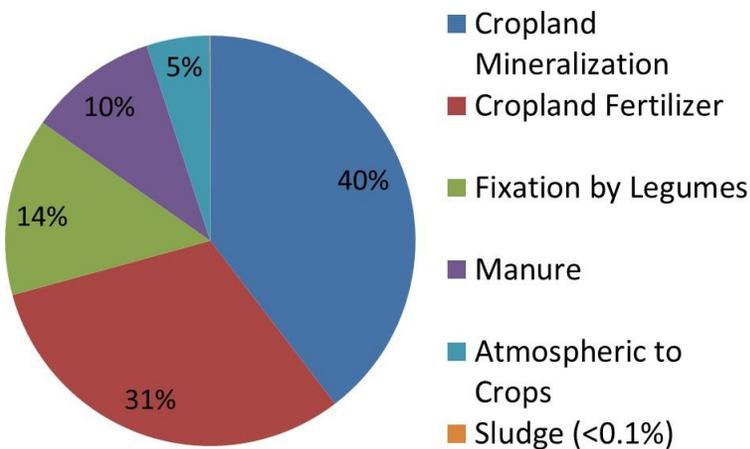


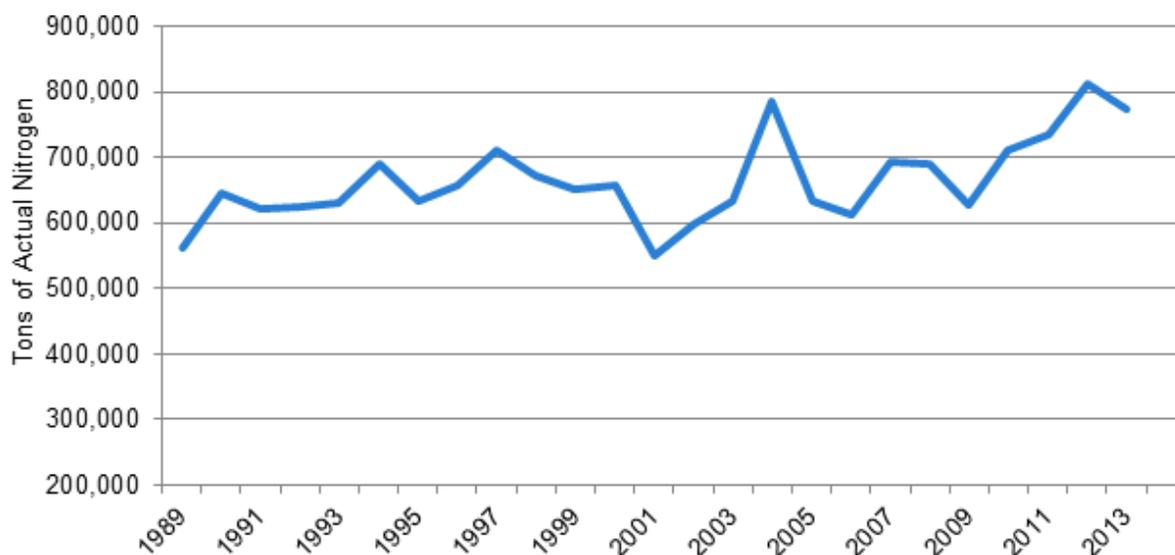
Figure 14. Major agricultural nitrogen sources in Minnesota (MPCA 2013). Cropland “mineralization” denotes the annual net mineralization between the total nitrogen released minus the amount going back into the organic fraction (immobilized)



NITROGEN FERTILIZER SALES AND SOURCES

Commercial nitrogen fertilizer use in Minnesota grew quickly between the late 1960s and 1970's, then began to stabilize in the early 1980's. Since 1990, statewide sales have averaged 669,000 tons per year and are trending slightly upward (Figure 15). Recent sales increases (12% higher than the long-term average) during the past five years are strongly linked to both increased corn acres and slightly higher application rates. Appendix G examines similar annual nitrogen sales information on a national and Midwest level.

Figure 15. Commercial nitrogen fertilizer sales trends in Minnesota from 1990 to 2013; ten year averages 1991-2000: 654,988; 2001-2010: 653,481; 2011-2013: 772,564 tons, based on MDA data

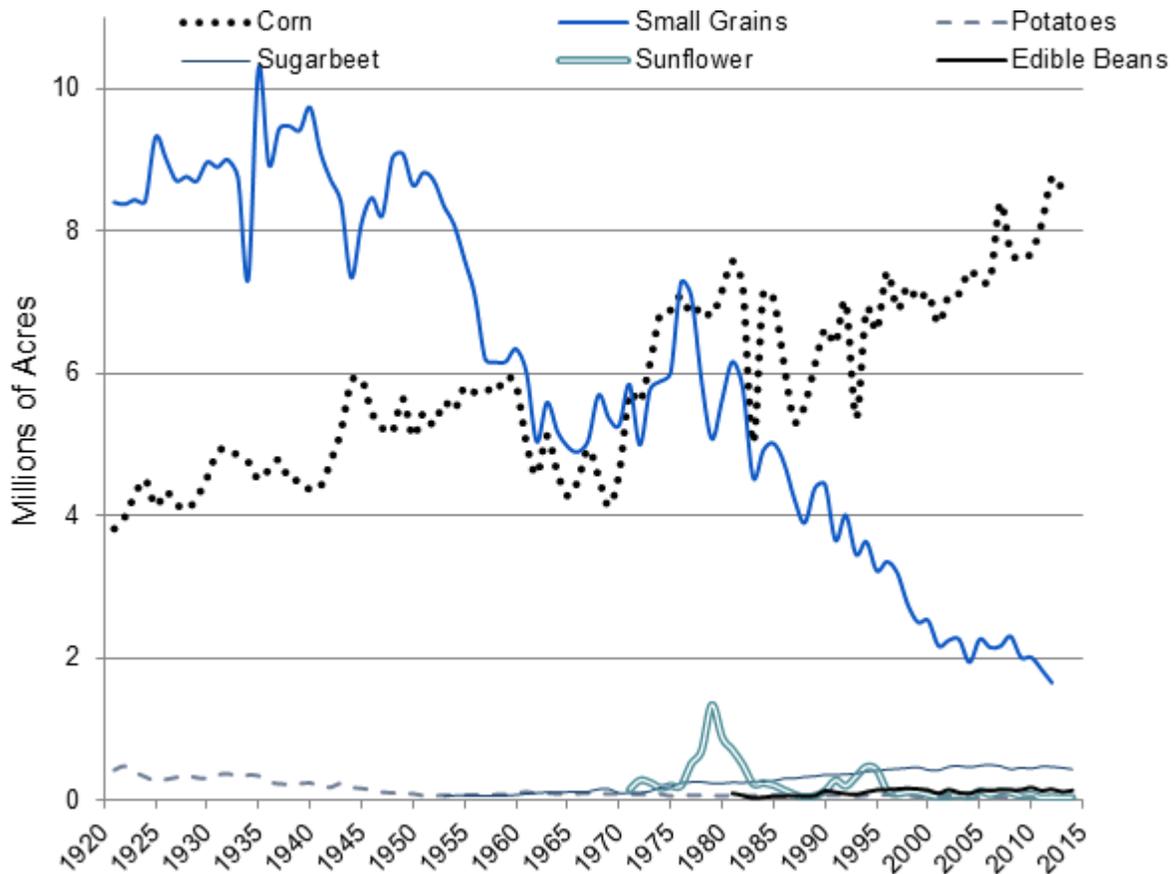


CROPPING TRENDS AND POTENTIAL NITROGEN LOSSES OF MINNESOTA'S MAJOR CROPS

Crop type is one of the most profound drivers influencing nitrate leaching losses and it is extremely important to understand these relationships. A summary of typical nitrogen fertilizer crop requirements, characteristics, and relative nitrate leaching losses can be found in Table G 1 in Appendix G.

Crop selection, as reported by the National Agricultural Statistics Service (NASS) over the past ninety years, has changed dramatically. Minnesota once routinely raised over 8 million acres of small grains each year (Figure 16). Acres dropped significantly in the 1950's and again during the 1980's and 1990's. Over the past decade, there are approximately 2 million acres of small grains grown. Small grains are generally considered to have a low to moderate impact on groundwater quality for the following reasons: solid seeding resulting in a uniform root distribution; typically grown in areas of low groundwater vulnerability; and moderate nitrogen inputs due to lodging concerns.

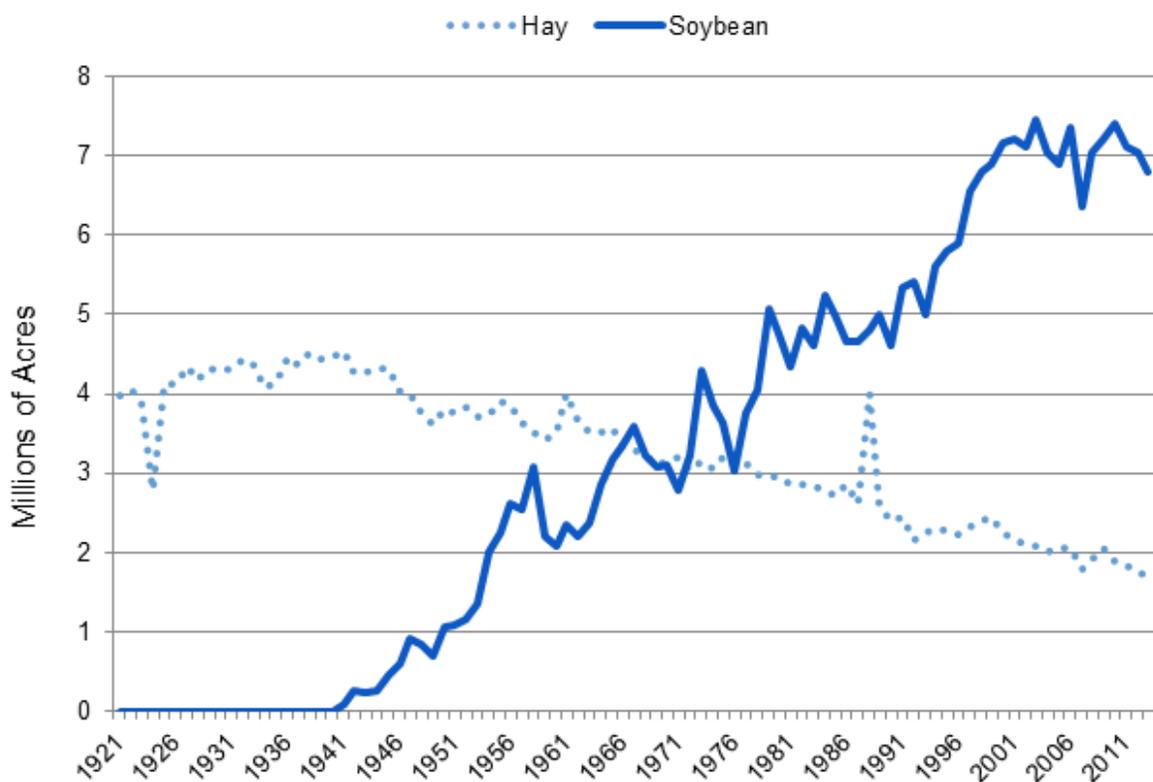
Figure 16. Acreage trends for Minnesota's nitrogen demanding crops from 1921 through 2012



Corn acres have been steadily increasing for the last ninety years. This crop has a high nitrogen-demand and has a narrow uptake period. Minnesota's nitrogen BMPs have a number of options to insure that this crop has the nutrients needed during its critical uptake period while minimizing the amount of inorganic nitrogen in the soil profile during other portions of the growing season. Other nitrogen-demanding crops, such as sugar beets and potatoes, are relatively small on a state acreage perspective but can have significant impacts (both economic and environmental) on a local area.

Looking back at the trends in "legume" crops since the 1920's (Figure 17), there has been a very steady decline of alfalfa and clover acres. Acreage declines in perennial legumes can be partially explained by both overall reductions in both number of milk cows and milking operations. Minnesota also imports a significant amount of these forages from the Dakotas where it can be grown at lower production costs and less prone to spoilage losses. These crops have strong, positive effects on groundwater quality and have been demonstrated to be extremely effective at removing nitrate from the soil profile resulting in high quality recharge into groundwater.

Figure 17. Acreage trends in Minnesota's legume and hay crops from 1921 through 2012

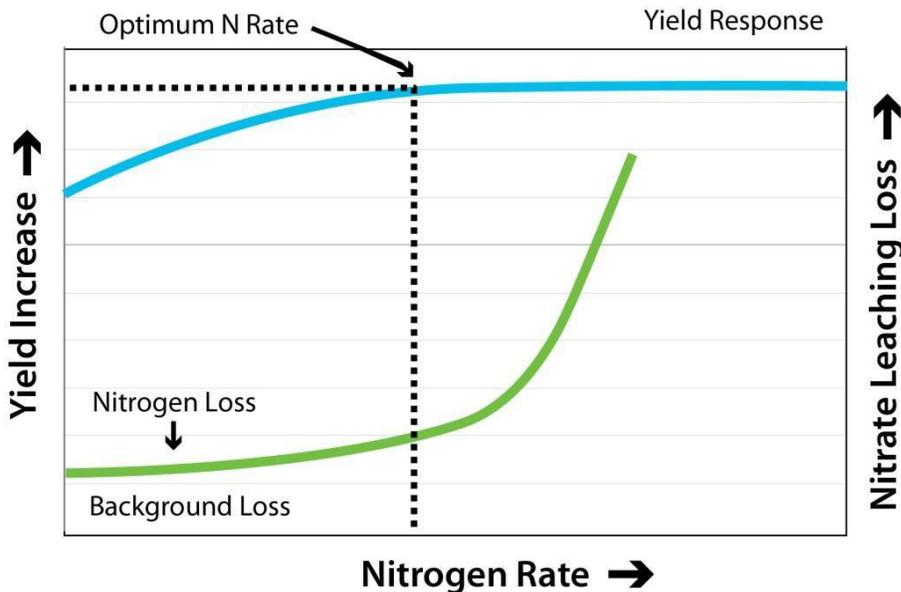


TRENDS OF NITROGEN FERTILIZER USE ON MAJOR CROPS, PRODUCTION AND FERTILIZER USE EFFICIENCY

Nitrogen fertilizer rate selected by farmers is a critical factor in understanding potential environmental consequences. Figure 18 is a conceptual illustration showing the important relationship between nitrogen fertilizer rates, crop response, and nitrate leaching losses. Identifying the optimum nitrogen rate is an important step in balancing the production aspects with environmental concerns associated with water quality. For simplicity sake, this illustration assumes that other important BMPs, such as timing and source, are already implemented.

It is important to note that there will almost always be some level of nitrate losses under row crop production regardless of nitrogen rates. Leaching loss contributions from non-fertilized corn typically range from 10 to 15 pounds per acre per year under highly productive Minnesota soils during normal rainfall conditions. These “background” losses are well documented from multiple tile drainage studies across diverse climatic conditions over the past 40 years at the University of Minnesota (U of M) Research and Outreach Centers across southern Minnesota. These losses can be limited to a 10 to 20% increase when using the optimum nitrogen rates in partnership with other BMPs such as the right timing, right source and placement. Nitrate leaching losses can increase dramatically when applying rates significantly greater than the optimum rates which are provided by the U of M.

Figure 18. Conceptual relationship between nitrogen inputs, crop response and nitrate leaching loss (Lamb et al. 2008)



Analysis of annual fertilizer sales combined with crop acres (NASS) suggests that corn (grain) consumes approximately 70-75% of the commercial nitrogen fertilizer each year (Figure G 4 in Appendix G). Additional MDA analysis of statewide use suggests that the average nitrogen fertilizer rate (regardless of crop rotations, legume crediting and manure applications) on corn tends to be between 120 to 140 pounds of nitrogen per acre (Figure G 5 in Appendix G). Average rates also appear to be increasing very slightly (4%) over the past 20 years. Average rates between the time periods of 1992-2001 and 2002-2011 were 124 and 129 pounds per acre per year, respectively. Additionally, the nitrogen rates estimated for 2012-2013 appeared to jump 5 to 10 pounds per acre and are likely to be directly linked to high corn prices. Information on commercial fertilizer rates on other Minnesota crops is not robust enough to examine trends.

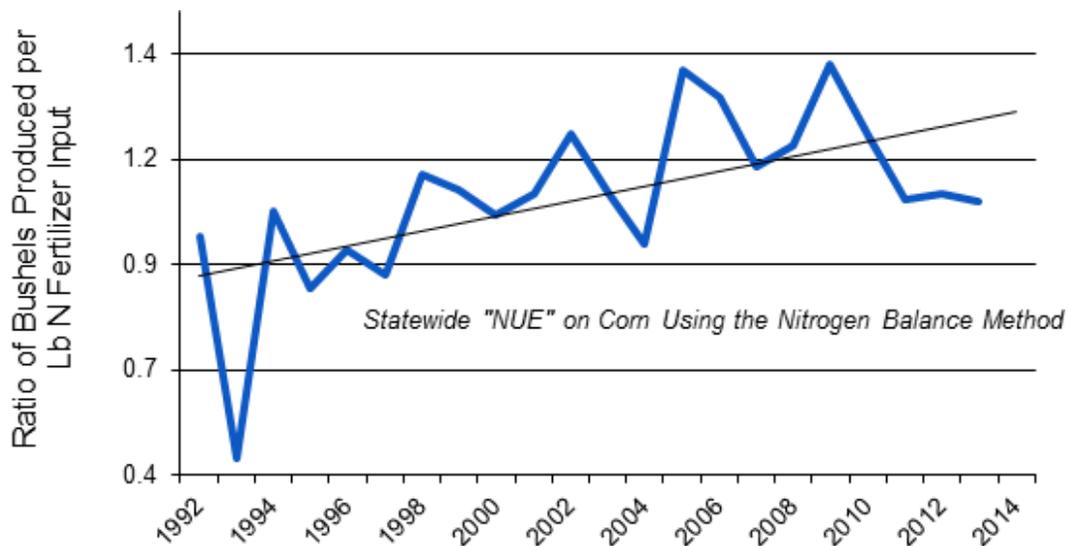
There are some other interesting trends that have developed over the last 20 years between inputs and outputs. Statewide nitrogen fertilizer consumption on corn has increased about 13%¹; corn acres have steadily increased by 8%² (Figure 19). However, the interesting outcome is that the corresponding yield (bushels produced) has increased about 40%³ over the same time period.

¹ Annual consumption by corn between 1992-2001 and 2002-2011 were 435,100 and 490,100 tons, respectively.

² Average corn (grain) acres between 1992-2001 and 2002-2011 were 7.0 and 7.6 million acres, respectively.

³ Average bushels of corn grain produced between 1992-2001 and 2002-2011 were 822,390 and 1,150,280 million, respectively.

Figure 19. Ratio of corn grain produced per pound of nitrogen fertilizer applied to Minnesota corn acres from 1992 to 2013



This relationship suggests that corn farmers are successfully getting more production from each pound of nitrogen fertilizer. From the environmental perspective, this trend is positive. However at this time, the causative factors or the direct environmental implications are not clear. Currently there is limited long-term research to demonstrate that increased nitrogen use efficiency (NUE) has a direct and positive impact on groundwater resources. The strongest evidence suggesting that this relationship exists comes from the Central Platte and other Natural Resources Districts in Nebraska where nitrogen regulations, which include mandatory fertilizer use reporting, have been in place for the last forty years (Ferguson 2013, personal communication). One of the complicating factors in this type of assessment is the fact that corn protein levels have been declining over the past decade or two with the newer corn hybrids. Simply stated, increased corn yields due to hybrid improvements may not be removing as much nitrogen from the soil system as in the past and the NUE trends may not necessarily reflect long-term improvements in water quality.

Figure 19 illustrates the improvements in nitrogen fertilizer use efficiency. Bushels produced per pound of nitrogen fertilizer have steadily increased from roughly 0.8 to 1.3 over the past twenty years. Lower NUE values in 2011, 2012 and 2013 are clearly related to moderate to severe moisture stress during the critical pollination and grain filling stages.

Many researchers suspect that there are multiple reasons for these trends with improved plant genetics being a significant driver. Root systems are larger, deeper and denser resulting in more effective nitrogen uptake and utilization. General adoption of the “4R” concept (right rate, right source, right timing and right placement) is another reason.⁴ Improved weed control and the use of different hybrids in different parts of the landscape are other important improvements. Additionally, the NUE trends can also reflect improvements in manure and legume crediting. Regardless of the reason, it is very clear that farmers are producing significantly more grain with each unit of nitrogen fertilizer input.

⁴ This concept, currently promoted by the agricultural industry as the “4Rs” (Right Rate, Right Timing, Right Source, and Right Placement), is a systems approach to fertilizing crops promoted by the International Plant Nutrition Institute, Canadian Fertilizer Institute, and The Fertilizer Institute.

Chapter 6 : Best Management Practices

BMPs have been discussed previously throughout this document. The term “Best Management Practices” is defined in Minnesota Statutes (Chapter 1). Minnesota has officially recognized nitrogen BMPs (Chapter 5). BMPs are the basis for the Nitrogen Fertilizer Management Plan’s (NFMP) prevention goal (Chapter 8). This chapter will provide information about the MDA’s past and future efforts to address BMP development, education and promotion, and evaluation.

The Groundwater Protection Act provides more detailed requirements for BMPs in Minnesota Statutes, section 103H.151, subdivision 2-4.

Subdivision 2 requires that:

The commissioner of agriculture, in consultation with local water planning authorities, shall develop best management practices for agricultural chemicals and practices. The commissioner shall give public notice and contact and solicit comment from affected persons and businesses interested in developing the best management practices.

Subdivision 3 requires that:

The commissioners of the Pollution Control Agency and agriculture, in conjunction with the Board of Water and Soil Resources, soil and water conservation districts, and the University of Minnesota Extension, must promote best management practices and provide education about how the use of best management practices will prevent, minimize, reduce, and eliminate the source of groundwater degradation. The promotion and education shall include demonstration projects.

Subdivision 4 requires that:

The commissioners of agriculture and the Pollution Control Agency shall, through field audits and other appropriate means, monitor the use and effectiveness of best management practices developed and promoted under this section. The information collected must be submitted to the Environmental Quality Board, which must include the information in the report required in section 103A.43, paragraph (d).

INTRODUCTION

BMPs for the management of nitrogen were first developed for Minnesota in the late 1980’s and early 1990’s by the U of M and are based upon many decades of crop response research. The BMPs are our best tools to manage nitrogen efficiently, profitably and with minimized environmental loss. BMPs are a reflection of our understanding of the nitrogen cycle, and are predicated on hundreds of site years of agronomic and environmental research. While acknowledging that no generalized recommendations are relevant all of the time, the BMPs represent a combination of practices that will reduce risk of excessive nitrogen loss in a normal year.

The BMPs are built on a four part foundation that takes into account the nitrogen rate, application timing, source, and placement of the application, known as the “4Rs”. If one of the “Rs” is not followed, the effectiveness of the system will be compromised, and there will be agronomic and or environmental consequences.

RISK

Minnesota's nitrogen BMPs are predicated on the concept of managing and reducing risk. A farmer's decisions regarding nitrogen fertilizer management integrate many factors. Because of the numerous trade-offs in optimizing all of the farm level factors, nitrogen fertilizer management is often an extension of overall farm risk management. The nitrogen BMP recommendations focus on managing the "agronomic risk," but there other types of risk that farmers also consider when making nitrogen fertilizer management decisions including economic, psychological, environmental, societal, and logistical risks (Beegle et al. 2008). Below are examples of how these risks might be considered in making nitrogen management decisions within each category.

Agronomic: "Am I applying the correct amount of supplemental nitrogen, at an appropriate time, in an appropriate form and by appropriate methods?"

Economic: "What is the economic optimum nitrogen rate for my fields?"

Psychological: "How good of a job do I need to do with nitrogen application?"

Environmental: "Do my nitrogen management practices minimize the potential for negative impacts on water quality?"

Societal: "Do my neighbors value the role I play in protecting water quality which impacts human, animal and environmental health?"

Logistical: "Do I, either myself or through the service providers who apply fertilizer for me, have enough time and the appropriate equipment to meet my nitrogen fertilizer application needs?"

Considering only one category of risk can be misleading. The U of M and the farmers can have a much better conversation when they acknowledge these factors jointly, which is why the U of M has revised the nitrogen BMPs to include a range of rates.

BMP DEVELOPMENT

The original nitrogen BMPs that were established for Minnesota in the 1990 NFMP have been adapted to account for most cropping systems within the state of Minnesota. The generalized statewide nitrogen BMPs are listed below:

- Adjust the nitrogen rate according to a realistic yield goal (for all crops except corn and sugar beets) and the previous crop.
- Do not apply nitrogen above recommended rates.
- Plan nitrogen application timing to achieve high efficiency of nitrogen use.
- Develop and use a comprehensive record-keeping system for field specific information.

- If manure is used, adjust the nitrogen rate accordingly and follow proper manure management procedures to optimize the nitrogen credit.
 - Test manure for nutrient content.
 - Calibrate manure application equipment.
 - Apply manure uniformly throughout a field.
 - Injection of manure is preferable, especially on steep sloping soils.
 - Avoid manure application to sloping, frozen soils.
 - Incorporate broadcast applications whenever possible.

Due to major differences in geology, soils and climate across the state, there are also regional recommendations (Figure 20). These regional recommendations give specific instructions on how to utilize the most appropriate nitrogen rate, source, timing, and placement. Regional and specialized nitrogen BMPs can be found in the following documents on the MDA website:

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

- Best Management Practices for Nitrogen Use in Minnesota
- Best Management Practices for Nitrogen Use in Northwestern Minnesota
- Best Management Practices for Nitrogen Use in South-Central Minnesota
- Best Management Practices for Nitrogen Use in Southeastern Minnesota
- Best Management Practices for Nitrogen Use in Southwestern and West-Central Minnesota
- Best Management Practices for Nitrogen Use on Coarse-textured Soils
- Best Management Practices for Nitrogen Use: Irrigated Potatoes

Minnesota nitrogen rate BMPs for corn are based on a grouped economic approach that determines nitrogen rates by applying economics to large sets of nitrogen response data. This is due to the fact that there is a very weak relationship between Economic Optimum Nitrogen Rate (EONR) and corn yield in the North-Central region of the United States. Prior to 2006, nitrogen rates were based on yield goal, but a group of researchers in the North-Central region showed that the relationship between the price of nitrogen fertilizer and the price of corn was actually a better predictor of the EONR than yield goals. The concepts and rationale for this approach to nitrogen recommendation development is further explained by Sawyer et al. 2006. Nitrogen BMPs that pertain to timing, placement and source of nitrogen fertilizer are specific for each region and are supported by empirical agronomic research data from that area of Minnesota.

Figure 20. Minnesota nitrogen BMP regions

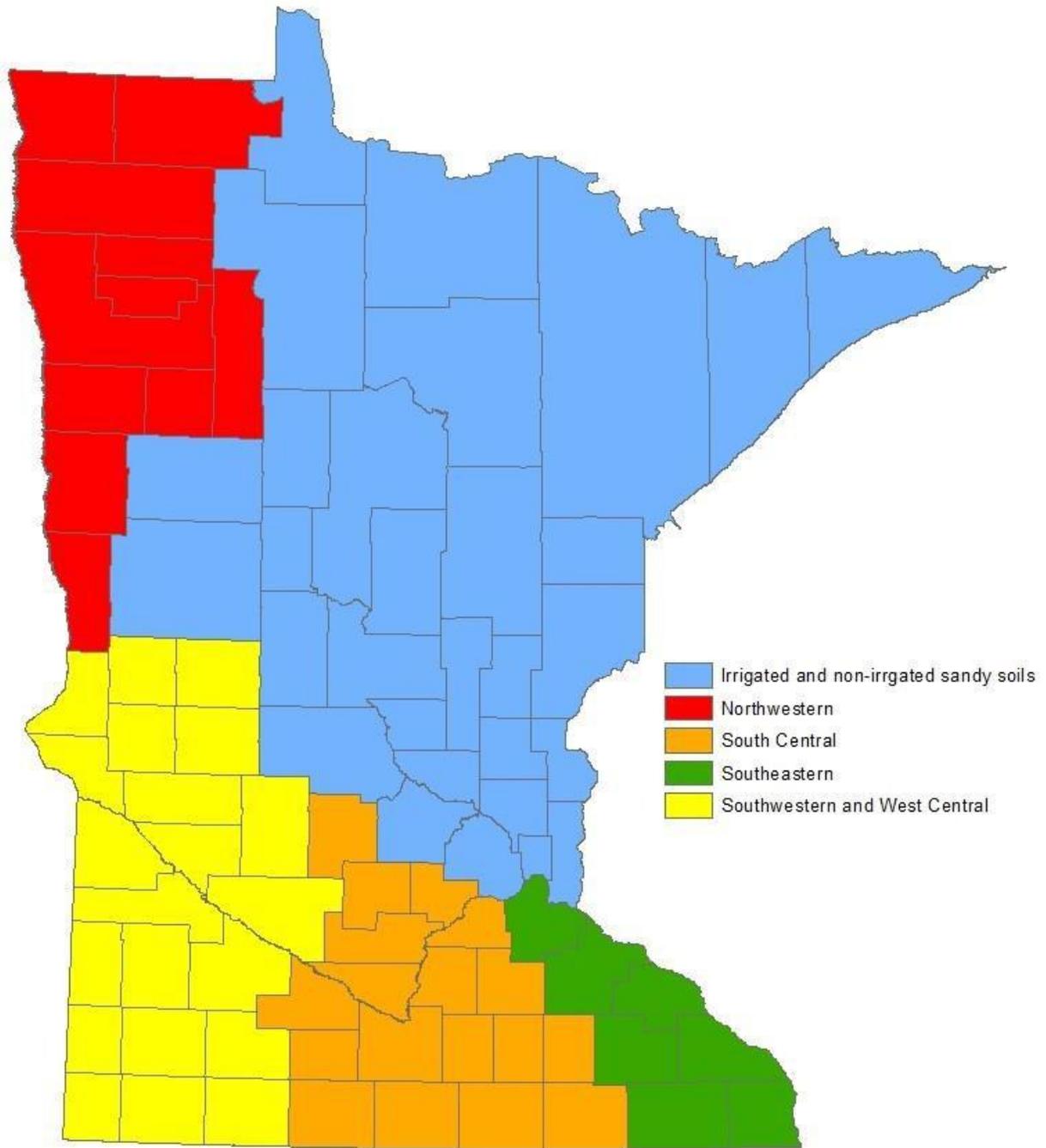


Table 6 summarizes how nitrogen sources and timing interact across state regions. For example, practices that may work well in southwestern Minnesota may not be appropriate for southeastern Minnesota. Nitrogen rate recommendations do not change across regions except for lower productivity soils.

Table 6. Summary of the major nitrogen timing and source recommendations for corn by region

Nitrogen BMP Region	Minnesota Recommended Application Timing for Corn		
	Fall*	Spring Preplant	Split or Sidedress
Southeast	Not Recommended	Highly Recommended: AA or Urea	Highly Recommended: AA, Urea, or UAN
		Acceptable with Risks: Preplant with UAN or ESN	
South-Central	Acceptable with Risks: AA or Urea with N-Serve	Highly Recommended: AA or Urea	Highly Recommended: Split Applications of AA, Urea, or UAN
	Not Recommended: Fall Application of Urea or UAN	Acceptable with Risks: Preplant with UAN or ESN	
Coarse-Textured Soils	Not Recommended	Acceptable with Risk: AA or Urea with N-Serve, Single Sidedress w/o N-Serve, or Single Preplant with ESN	Highly Recommended: Use Split Applications, N-Serve with Early Sidedress
Southwest/West-Central	Recommended: Fall Application of AA or Urea	Recommended: Urea, AA, or UAN	Recommended: Sidedress Prior to V7 Growth Stage
	Acceptable with Risk: Late Fall ESN or use of N-Serve or Agrotain		
	Not Recommended: Fall UAN or Any Fertilizer Containing Nitrate		
Northwest	Recommended: Fall Application of AA or Urea	Recommended: Urea, AA, or UAN	Recommended: Sidedress Prior to V7 Growth Stage
	Acceptable with Risk: Late Fall ESN or Use of N-Serve or Agrotain		
	Not Recommended: Fall UAN or Any Fertilizer Containing Nitrate		

*Only after six inch soil temperatures fall below 50 °F

Note: AA=Anhydrous Ammonia, ESN=Environmentally Smart Nitrogen, UAN=Urea Ammonium Nitrate Solution

Each BMP region of Minnesota has specific risks, BMPs, acceptable practices, and practices that are not recommended. In addition to the practices listed above, a short summary of each region is listed below.

BMP REGION: SOUTHEAST

Physical Features and Cropping Systems: Characterized by permeable, silt loam soils with underlying fractured limestone bedrock. Highly productive soils with greater than 32 inches of average annual rainfall. Major crops include corn, soybeans, forages and oats.

Groundwater Concerns and Localized Problematic Areas: This region is very susceptible to groundwater contamination, particularly in close proximity to sink holes. Elevated nitrate levels are common in this region as discussed in Chapter 3. Current community water suppliers with elevated nitrate are: Hastings; Lewiston; Plainview; Utica; and several wells within the Rochester wellhead protection area. Hastings installed a nitrate removal system and plans to install a second system in the near future.

Recommended BMPs: Include accounting for nitrogen in ammoniated phosphorus products, spring preplant (PP) or split applications (PP+ sidedress) of nitrogen, utilizing appropriate legume and manure credits, minimizing direct surface water movement to sinkholes, incorporating nitrogen fertilizer and using a nitrification inhibitor on early applied sidedress (SD) nitrogen.

Practices that are acceptable with a higher degree of risk include PP applications of UAN (urea and ammonium nitrate) and ESN (Environmentally Smart Nitrogen, a slow release, urea nitrogen fertilizer).

Practices that are not recommended include any fall application of any form of nitrogen fertilizer, applying ammoniated phosphorus fertilizers to frozen ground (due to risk of runoff), and sidedressing all of the nitrogen fertilizer in continuous corn production (risk of stunting early season crop growth).

BMP REGION: SOUTH-CENTRAL MN

Physical Features and Cropping Systems: Characterized by fine-textured soils formed in glacial till and sediments. Most south-central soils have naturally poor-to-moderate internal drainage and have subsurface drainage systems to improve drainage. Average annual precipitation in the region is 27 to 35 inches. Crops are predominantly corn and soybeans.

Groundwater Concerns and Localized Problematic Areas: Due to the fine-textured till soils commonly found in this region, groundwater resources are generally well protected. However, there are some exceptions where coarse-textured soils are found on a localized level. The City of St. Peter, for example, has been dealing with elevated nitrate for the past 20 years and recently installed a nitrate removal system.

Recommended BMPs: Include accounting for the nitrogen in ammoniated phosphorus products, spring PP applications of nitrogen, utilizing appropriate legume and manure credits, incorporating nitrogen fertilizer and using split applications of nitrogen on sandy soils.

Practices that are acceptable with a higher degree of risk include fall applications of anhydrous ammonia (AA) with a nitrification inhibitor, spring preplant applications of UAN, and late fall or early preplant applications of ESN.

Practices that are not recommended include fall application of urea or AA fertilizer without a nitrification inhibitor, applying ammoniated phosphorus fertilizers to frozen ground (due to risk of runoff), sidedressing all of the nitrogen fertilizer in continuous corn production (risk of stunting early season crop growth), fall application of UAN, and fall applications of nitrogen to sandy soils.

BMP REGION: SOUTHWESTERN AND WEST-CENTRAL MINNESOTA

Physical Features and Cropping Systems: This region of the state is characterized by soils that have a medium to fine texture which were formed from loess, glacial till, or lacustrine deposits. The large majority of the soils have moderate to poor internal drainage, and tile has been installed to improve production.

This region also has a vast difference in the soils from north to south with heavier soils located in the southern portion of the region and often irrigated sandier soils located in the northern portion of the region. Average annual precipitation in the region is often below 30 inches, and as low as 25 inches in some areas. Corn, soybean, wheat and sugar beet are dominant crops in the region.

Groundwater Concerns and Localized Problematic Areas: Due to the medium to fine textured soils found in this region coupled with lower annual precipitation, groundwater resources are generally adequately protected. However, water availability can be a problem in southwest Minnesota. Rural water systems, such as Lincoln-Pipestone, Rock and Red Rock, are essential in providing adequate supplies to rural Minnesota. Water from these important alluvial channels is commonly impacted by nitrate. The Holland well field (part of the Lincoln-Pipestone Rural Water System), along with a number of small communities (Edgerton, Adrian, Ellsworth, etc.) have found it necessary to install nitrate removal systems.

Recommended BMPs for Corn: Include accounting for nitrogen in ammoniated phosphorus products, utilizing appropriate legume and manure credits, utilize a deep nitrate soil test in the fall as a nitrogen credit, incorporating nitrogen fertilizer, and split apply nitrogen on sandy soils.

Recommended BMPs for Sugar beet: Include using a 4 foot deep soil nitrate test to credit nitrogen applications, a total nitrogen rate (including credits) of 110 to 130 pounds per acre, and applying ammonium nitrogen fertilizers in the fall after soil temperatures have dropped below 50° F.

Practices that are acceptable with a higher degree of risk include late fall and PP applications of ESN and the use of urease and nitrification inhibitors with fall applied nitrogen (research has not shown a high degree of efficacy for these products at this time).

Practices that are not recommended for corn or sugar beets include any fall application of fertilizers containing nitrate, applying ammoniated phosphorus or any nitrogen fertilizers to frozen ground (due to risk of runoff), and not incorporating fall applied urea (fall applied urea is subject to very high nitrogen loss to volatilization if unincorporated on high pH soils).

BMP REGION: NORTHWESTERN MINNESOTA

Physical Features and Cropping Systems: This region of the state is characterized by soils that have a medium to fine texture which were formed from loess, glacial till, or lacustrine deposits. The large majority of the soils have moderate to poor internal drainage and tile has been installed to improve production.

Because of the flatness of the region, water often has to be pumped from the field and flooding is also common in areas within this region. This region also has a shorter growing season than other regions. Average annual precipitation in the region is often below 25 inches in many areas. Wheat is the dominant crop although corn, soybean and potatoes are also grown. Corn and sugar beets grown in Northwest Minnesota should use the nitrogen BMPs for Southwest and West-Central Minnesota.

Groundwater Concerns and Localized Problematic Areas: Due to the medium to fine textured soils found in this region coupled with lower annual precipitation, groundwater resources are generally

adequately protected. There are very limited documented areas of nitrate contaminated hotspots in this region. Areas of concerns would be the coarse-textured soils found along the beach ridges of the Red River Valley.

Contaminated wells due to surface water intrusions from spring flooding are a significant problem.

Recommended BMPs for small grain production: Include an initial nitrogen rate based on expected yield, adjust nitrogen rate according to fall 2 foot deep soil nitrate test results and legume credits, accounting for nitrogen in ammoniated phosphorus fertilizers, incorporating or banding any fall applied urea, apply AA or urea after soil temperatures are below 50° F, incorporating nitrogen fertilizer, and taking credit for nitrogen contained in previous sugar beet crop tops.

Practices that are acceptable with a higher degree of risk are applying up to 40 pounds of liquid nitrogen to foliage at boot stage or later and banding urea with or near the seed at planting.

Practices that are not recommended include fall applications of any nitrogen fertilizers containing nitrate, not incorporating spring or fall applied urea (high soil pH exacerbates urea nitrogen loss to volatilization), shallow applications of AA, foliar applications of greater than 40 pounds of nitrogen at boot stage or later, applying ammoniated phosphorus or any nitrogen fertilizers to frozen ground (due to risk of runoff), and fall applications of nitrogen (regardless of source) to sandy soils.

BMP REGION: COARSE-TEXTURED SOILS IN MINNESOTA

Physical Features and Cropping Systems: Sandy soils dominate the landscape in the central and east-central regions of the state. These coarse-textured soils are also scattered throughout the remainder of the state. Groundwater is often located 30 feet or less below many of these sandy soils. Average annual precipitation in the region is often below 25 inches in western area while in the eastern areas 30 inches or more is common. Corn, soybean, edible beans, wheat, potatoes and some vegetables are grown in the region. Irrigation is common on the sandy soils in this region. The nitrogen BMPs for the coarse-textured soils in Minnesota are aimed specifically at irrigated and dry land corn and edible beans. Nitrogen rate recommendations take into account the productivity of the soil, which in most cases is a function of irrigation and soil water holding capacity. Non-irrigated crops, grown on coarse-textured soils, tend to be classified as medium productivity, and will have a lower nitrogen rate recommendation than a soil that is classified as highly productive. It should be noted that the irrigated nitrogen recommendations are currently being revised, and this revision will be complete in 2015.

Groundwater Concerns and Localized Problematic Areas: Nitrate contamination can be a significant localized problem (Chapter 3) due to the coarse-textured soils, shallow distance to groundwater, and most of the state's irrigation development can be found in the Central Sands and the Dakota/Goodhue/Washington County area. Additionally, crop failure and water stress under dry land conditions can have significant ramifications on nitrate leaching losses.

Many public water suppliers dealing with nitrate issues are found under coarse-textured soil conditions. Examples are the cities of Perham, Park Rapids, Verndale, Hastings, and Cold Spring.

Recommended BMPs: Include accounting for nitrogen in ammoniated phosphorus products, split applications of nitrogen for corn and edible beans, utilizing appropriate legume and manure credits, incorporating nitrogen fertilizer, and using a nitrification inhibitor on early applied SD nitrogen.

Practices that are acceptable with a higher degree of risk include using just a single SD application of AA, spring PP application of ESN and use of nitrification inhibitors with spring PP applications.

Practices that are not recommended include any fall application of nitrogen fertilizer, not accounting for legume credits, fertigation of nitrogen after corn has tasseled, and application of ESN after planting edible beans (nitrogen will not be available soon enough due to the slow release).

To learn about Regional Issues and Opportunities for Advancements in Nitrogen Management see Appendix H.

BMP PROMOTION

As part of its statutory mandate to demonstrate and promote the effectiveness of the BMPs, the MDA has also instrumented several edge-of-field monitoring and demonstration sites to monitor or evaluate nitrogen loss through tile drainage, monitoring wells, and root zone monitoring. The sites known as [Red Top Farm](#), [Clay County Drainage site](#), and [Highway 90](#) are tile drained and the MDA staff have instrumented these sites to collect water quality data on the effectiveness of the BMPs in reducing nitrate loss through tile drainage. The Red Top and Highway 90 sites have been retired due to changes in land management, but a wealth of information has been garnered about nitrogen and its fate in Minnesota crop production.

In the coarse-textured irrigated sands of Minnesota, suction cup lysimeters have been utilized at the [Rosholt Farm](#) to quantify the loss of nitrate from the root zone under nitrogen rate plots that are currently being managed by U of M Extension. These nitrogen rate plots are part of the ongoing effort to revise and refine the rate BMPs for irrigated coarse-textured soils. The MDA staff have also instrumenting similar demonstration sites in the coarse-textured soils of Dakota, Lyon, Otter Tail, Stearns, and Wadena Counties.

On-farm nitrogen rate demonstration sites like the MDA's [Nutrient Management Initiative \(NMI\)](#) has also been a tool to allow farmers to compare the nitrogen BMP rate range to higher nitrogen rates in order to increase farmer acceptance of the rates. At the end of the season farmers are provided with an economic analysis based on their actual nitrogen costs and yields. Since 2006, over 190 farmers have participated in the NMI program.

[Minnesota Discovery Farms](#), a farmer led program that is led by the Minnesota Agricultural Water Resource Center and supported by the MDA, is also contributing to the promotion of the BMPs and our understanding of the field scale impact of the nitrogen BMPs and conservation practices. Minnesota Discovery Farms encompass numerous farm enterprises across Minnesota, and will inform our understanding of the baseline effects of these practices.

The [Root River Partnership](#) is designed to help southeastern Minnesota farmers and policy-makers better understand the relationship between agricultural practices and water quality. The purpose of this study is to conduct intensive surface and groundwater monitoring at multiple scales in order to provide an assessment of the amount and sources of nutrients and sediment delivered to the watershed outlet and also to determine the effectiveness of the BMPs.

The MDA will continue to dedicate time and resources towards understanding and promoting new and emerging practices that can improve nitrogen use efficiency and advance conservation in agriculture.

TOOLS FOR THE EVALUATION OF BMP ADOPTION

According to Minnesota Statutes, BMP evaluation has two components, the evaluation of BMP adoption, and the evaluation of BMP effectiveness. Each component must be evaluated individually, and their combined effect must be evaluated as well. Evaluation of either component will be a complex process. This section will discuss the tools used for determining the adoption of practices.

The results of BMP implementation may not be discernible, as measured by the level of change in nitrate concentration of ground or surface water, for a long period of time. Furthermore, changes in nitrate concentration observed over the course of a single year may or may not be related to the adoption of the BMPs. In view of these challenges, it is recognized that BMP adoption must be evaluated as well as BMP effectiveness in preventing or reversing the degradation of water quality.

Interviews: The ability for state agencies and Extension to document farmer adoption rates of voluntary BMPs is a critical component of the 1989 Minnesota Groundwater Protection Act. The MDA has developed a diagnostic tool called FARM Nutrient Management Assessment Process (FANMAP) to get a clear understanding of existing farm practices regarding agricultural inputs such as fertilizers, manures and pesticides. Although it is labor intensive, it provides a useful and accurate method of compiling data on BMP adoption.

Results have been used to design focused water quality educational programs. Data collected in the program's infancy can be used as a baseline to assist in determining if the BMPs are being adopted. Over the years, hundreds of farmers have volunteered two to four hours of their time to share information about their farming operations. The complete compendium of FANMAP surveys is available on the [MDA website: http://www.mda.state.mn.us/protecting/soilprotection/fanmap.aspx](http://www.mda.state.mn.us/protecting/soilprotection/fanmap.aspx).

Phone Surveys: The MDA has partnered with the USDA National Agricultural Statistics Service (NASS) and U of M researchers to collect information about fertilizer use and farm management on regional or statewide scales. Partners have pioneered a survey tool for characterizing fertilizer use and associated management. Surveys are conducted over the phone.

Enumerators from NASS are highly skilled at obtaining critical information over the phone with minimal time and burden on the farmer. The first attempt using this technique was in 2010. NASS enumerators surveyed approximately 1,500 corn farmers from across the state to gather information about commercial fertilizer use on corn (Bierman et al. 2011). Statewide nitrogen use surveys for grain corn production are now conducted every other year in partnership with NASS. During the alternate year, surveys on other crops and practices are conducted.

Currently reports can be found on the [MDA website: http://www.mda.state.mn.us/](http://www.mda.state.mn.us/).

BMP EVALUATION: CURRENTLY IMPLEMENTED PRACTICES

This most recent assessment of nitrogen management practices provide metrics for understanding the status of nitrogen BMP adoption on Minnesota corn acres. Table 7 compares the recommended timing and fertilizer sources with the actual timing reported by farmers in that region. In general, many of the timing BMPs are followed but there may be opportunities for Minnesota farmers to improve their nitrogen management by incorporating more split and sidedress applications.

Table 7. Overview of nitrogen recommendations and distributions of nitrogen application timings (Bierman et al. 2011)

Nitrogen BMP Region	Recommended Timing of the Primary Nitrogen Application Minnesota Recommended Application Timing for Corn			Actual Timing of the Primary Nitrogen Application (Reported as % of Primary Nitrogen Source)		
	Fall*	Spring Preplant	Split or Sidedress	Fall	Spring Preplant	Split or Sidedress
Southeast	Not Recommended	Highly Recommended: AA or Urea	Highly Recommended: AA, Urea, or UAN	5%	88%	5%
		Acceptable with Risks: Preplant with UAN or ESN				
South-Central	Acceptable with Risks: AA or Urea with N- Serve	Highly Recommended: AA or Urea	Highly Recommended: Split Applications of AA, Urea, or UAN	43% with a Very High % as AA, 51% of AA included N-Serve. Minimal Fall Applied Urea (<5%) or UAN	53%	7%
	Not Recommended: Fall Application of Urea or UAN	Acceptable with Risks: Preplant with UAN or ESN				
Coarse-Textured Soils	Not Recommended	Acceptable with Risk: AA or Urea with N-Serve, Single Sidedress w/o N-Serve, or Single Preplant with ESN	Highly Recommended: Use Split Applications, N-Serve with Early Sidedress	5% Note: There are Some Fine Textured Soils with the Counties Designated as Coarse-Textured	70% , Urea is Dominant Source	25%, UAN is the Probable Dominant Source on Irrigated Split Applications
Southwest/ West-Central	Recommended: Fall Application of AA or Urea	Recommended: Urea, AA, or UAN	Recommended: Sidedress Prior to V7 Growth Stage	47%	47%	7%
	Acceptable with Risk: Fall ESN or N-Serve with Agrotain					
	Not Recommended: Fall UAN					
Northwest	Recommended: Fall Application of AA or Urea	Recommended: Urea, AA, or UAN	Recommended: Sidedress Prior to V7 Growth Stage	11%	89%, Urea is Dominant Source	0%
	Acceptable with Risk: Fall ESN or N-Serve with Agrotain					
	Not Recommended: Fall UAN					

*Only after six inch soil temperatures fall below 50 degrees F

Note: AA=Anhydrous Ammonia, ESN=Environmentally Smart Nitrogen, UAN=Urea Ammonium Nitrate Solution

Detailed analysis supporting this table is provided in Appendix H.

Nitrogen rates are also a major concern and component of good nitrogen management, and are probably the first part that comes to mind for most farmers when nitrogen management is discussed. Table 8 presents the range of nitrogen rate recommendations for corn, and the average nitrogen rates for each region. For corn following corn acres, the nitrogen rates fell squarely within an acceptable range. The nitrogen rates that were used for corn following soybeans tended to be toward the higher end of the range, and for South-Central Minnesota, rates were actually outside of the acceptable range. This is partly due to the largest percentage of nitrogen rates in the South Central region being from 140 to 154 pounds per acre. Survey data suggests that there is a need to improve crediting for all nitrogen sources such as corn following soybeans, alfalfa and especially manure. Additional work also needs to be done to provide appropriate recognition and guidance for variable rate applications of fertilizer.

Table 8. Minnesota nitrogen BMPs and mean nitrogen rates (Bierman et al. 2011)

Nitrogen BMP Region	Acceptable Range of Nitrogen Rates for Nitrogen Fertilizer on Corn (pounds per acre)		Mean Nitrogen Rate Reported by Minnesota Corn Farmer (pounds per acre)	
	Corn Following Corn	Corn Following Soybeans	Corn Following Corn	Corn Following Soybeans
Southeast	100-180	70-140	143	138
South-Central	100-180	70-140	160	145
Irrigated Coarse-Textured Soils	100-180	70-140	146	151
Coarse-Textured Soils	100-180	70-140	128	137
Southwest/West-Central	100-180	70-140	145	138
Northwest	100-180	70-140	NA	126

FUTURE BMPS AND REFINEMENT OF EXISTING BMPS

As science and technology rapidly evolve, agriculture has often been on the cutting edge with continual changes in practices. Therefore it is important that the nitrogen BMPs also stay current with evolving agricultural technology and actual changes in practices on the farm. Some current examples of agricultural practices or new technology that need revision or development of formal state BMPs include the following:

- Optical reflectance of crop canopy to evaluate in-season nitrogen stress from active sensors and remote sensing is widely viewed in the academic and industry world as the next frontier in nitrogen management. The current challenge is to demonstrate that these tools can do a better job of quantifying nitrogen stress and addressing variability than our current nitrogen rate BMPs due to spatial and temporal variability. The MDA has currently proposed using Clean Water Fund research dollars to evaluate the efficacy of these tools.
- Research is currently being conducted to update the BMP recommendations for corn grown on irrigated sands, and is expected to be completed in 2015. An outcome of this study will also be emphasizing the role that irrigation water management will play in reducing the impact of nitrogen fertilizer on groundwater in irrigated sands.
- Improving the understanding of variables influencing nitrogen mineralization rates on a field scale is critical as precision agriculture moves forward. The Minnesota Corn Growers Association as well as the Agricultural Fertilizer Research and Education Council (AFREC) have recently invested significant resources in U of M research programs to insure that this research moves forward in a timely fashion.
- It is also acknowledged that in some irrigated, coarse-textured areas of Minnesota, nitrogen BMPs alone may not be enough to reverse the effects of groundwater contaminated by nitrate. Resources may be allocated to evaluate the feasibility of transitioning to alternative cropping systems that have lower nitrogen inputs, greater water use efficiency, and or the ability to assimilate nitrogen more efficiently.

TECHNICAL ADVISORY COMMITTEE FOR BMP DEVELOPMENT

One of outcomes of the NFMP revision will be the development of a technical advisory team that will serve several functions. The first role will be in assisting local advisory groups in establishing prioritized BMPs, based on the best available science and reasonable considerations for local conditions and cropping systems, for nitrate impacted areas. Prioritization of site specific BMPs will play an important role in making sure that targeted and impacted groundwater areas respond positively, both environmentally and agronomically. This committee will also assist the MDA in prioritizing the development and revision of the nitrogen BMPs.

Chapter 7 : Nitrogen Fertilizer Management Plan Process Overview

The purpose of the NFMP is to prevent, evaluate and mitigate nonpoint source pollution from nitrogen fertilizer in groundwater. The NFMP includes components promoting prevention and developing appropriate responses to the detection of nitrogen fertilizer in groundwater. The prevention strategy utilizes officially recognized Minnesota nitrogen fertilizer BMPs, as well as education, outreach, demonstration and training to accomplish the prevention goal. The mitigation strategy, which also includes all of the prevention strategies, necessitates a higher level of effort and intensity. Both the prevention and mitigation strategies are intended to engage local communities in the development and implementation of activities to protect groundwater from nitrate contamination.

The NFMP is designed to allow for evaluation and response to nitrogen contamination on a state, regional, or local basis. The structure of the NFMP must be flexible in order to address the site specific nature of groundwater contamination problems. Additionally the structure must be dynamic, in order to allow for advancements in soil and crop management as well as groundwater monitoring technology.

GENERAL APPROACH OF THE NFMP

The general approach used by the NFMP to address nitrate in groundwater consists of the following activities:

- Identify areas of elevated nitrate in groundwater;
- Promote nitrogen BMPs and low nitrogen cropping systems to protect groundwater statewide but with greater efforts in hydrogeologically vulnerable areas;
- Monitor private drinking water wells (or use existing monitoring data) on a township scale over a 10-year cycle and use the best available data from public wells in wellhead protection areas to identify areas with nitrate concerns;
- Conduct a detailed assessment of groundwater nitrate conditions in these areas to determine the severity and priority of the problem;
- Involve the agricultural community in problem solving at the local level; and,
- Conduct mitigation in high priority areas using a phased approach starting with voluntary actions and progressing to regulatory actions if necessary.

Each of the activities listed above are discussed in detail in subsequent chapters. A brief overview is provided below.

PREVENTION

Prevention activities focus on promoting the nitrogen BMPs to protect groundwater from nitrogen fertilizer leaching . Prevention activities within the NFMP are ongoing regardless of the status of mitigation for nitrate in groundwater. These efforts will be coordinated through a new statewide Nitrogen Fertilizer Education and Promotion Team (NFEPT). Implementation of education, outreach and demonstration activities will be accomplished through existing programs.

MONITORING AND ASSESSMENT OF GROUNDWATER

The goal of monitoring and assessment is to develop a comprehensive understanding of the severity, magnitude, and long term trends of nitrate in groundwater as measured in public and private wells. Assessment of nitrate levels in private and public wells initiates the NFMP process and aids in determining the activity level in an area.

MITIGATION

The mitigation framework is comprised of four implementation levels (Levels 1-4). The mitigation process consists of planning activities, an implementation period, followed by an evaluation of the adoption of nitrogen BMPs and verification of nitrate concentration data to determine next steps.

The NFMP emphasizes engaging key groups who are involved with crop production and the use of nitrogen fertilizers. Target groups include farmers, certified crop advisors, fertilizer retailers, crop advisors/consultants, and professional organizations that provide information on planning and guidance to farmers. These individuals and organizations have specialized knowledge and are in a position to influence BMP adoption. A significant effort will be conducted to coordinate with these professionals to protect groundwater resources in a responsible and effective manner.

Chapter 8 : Prevention

GOAL AND STRATEGY

PREVENTION GOAL

The prevention goal in the NFMP is the groundwater degradation prevention goal of the Groundwater Protection Act (cited in Chapter 1). Prevention is significantly emphasized because once groundwater is contaminated, the remediation process can be extremely slow, difficult, and expensive. Prevention activities within the NFMP are ongoing regardless of the status of mitigation for nitrate in groundwater. It is intended that prevention be accomplished by promoting Nitrogen Fertilizer BMPs, which are defined in the Groundwater Protection Act as practices that consider economic factors, availability, technical feasibility, implementability, effectiveness, and environmental effects.

PREVENTION STRATEGY

The MDA must promote BMPs and provide education about how their use will prevent, minimize, reduce, and eliminate the source of groundwater degradation. The objective of education and promotion in the NFMP is to assist farmers in the adoption of nitrogen fertilizer BMPs to the fullest extent possible for their given operation. For the purposes of the NFMP, education is the process where people become aware of a BMP and then acquire the needed knowledge and skills to successfully use it. Promotion is the process where an individual or a group supports or encourages others to consider a BMP and incorporate it into their cropping system. Promotion can also involve removing barriers to BMP adoption, such as assuring specialized nitrogen fertilizer products are available in an area, or providing financing for equipment purchases.

MDA and partners such as the U of M will provide BMP education and promotion to farmers and to those who provide farmers with crop nutrient management services and support, including crop advisors/consultants and Soil and Water Conservation District (SWCD) staff, and suppliers of fertilizer, farm equipment, and agricultural technology. In addition, education is provided to residents and local government officials and staff in areas susceptible to nitrate groundwater contamination so they are aware of the nitrogen fertilizer BMPs and their role in protecting groundwater quality.

PREVENTION IMPLEMENTATION

Since 1990, the NFMP prevention efforts have included implementing a variety of activities at a statewide, regional and on-farm level (Table 9). Providers of nitrogen BMP education and promotion in Minnesota have varied over time. The once predominate role of U of M Extension has been supplanted by others following Extension's move from a county-based to a regional-based program delivery model in the early 2000's. Extension still plays an important role, especially in developing educational materials and providing statewide and regional training for farmers and agricultural professionals, but now a larger role is played by crop consultants, agribusiness, SWCDs, state agencies, and non-profit organizations. Moreover, the wide availability of accurate yield monitors, global positioning systems (GPS) and remote sensing technology has allowed farmers to conduct their own on-farm demonstrations and to provide peer-to-peer consultation. Internet access has given farmers much more information at their fingertips as well.

Table 9. Examples of nitrogen BMP education and promotion activities implemented since 1990

STATEWIDE	
Type	Examples
Publication	U of M Extension's Best Management Practices for Nitrogen Use in Minnesota
Media	MDA and U of M press releases in agricultural newspapers, radio and television
Internet	MDA and U of M nutrient management websites, MDA soil temperature website, U of M and agricultural industry crop production blogs
Conference	U of M Extension Short Course, Minnesota Ag Expo
Exhibit	MDA exhibits at Minnesota Crop Production Retailers Trade Show and Minnesota Ag Expo
REGIONAL	
Type	Examples
Communications	Newsletters and e-mail updates from agricultural industry and SWCDs.
Conference	Nutrient Management Efficiency Conferences, U of M Winter Crop Days, Irrigation Management Workshops
Demonstration	MDA's tile drainage demonstration sites, U of M Extension and MDA's nitrogen management on coarse-textured soils demonstrations
ON FARM	
Type	Examples
Demonstration	Nutrient Management Initiative demonstrations, adaptive nitrogen demonstrations, manure management demonstrations, Discovery Farm sites, WinField Answer Plots

PREVENTION PRACTICES AND TOOLS

A variety of practices and tools can be utilized in order to achieve the NFMP prevention goal. Each is described in detail below.

BEST MANAGEMENT PRACTICES

According to Minnesota Statutes, the NFMP must include components promoting prevention. The primary tool for achievement of this objective is the adoption of nitrogen BMPs, which are discussed in detail in Chapter 6. The MDA will work with various partners to educate and promote BMPs for nitrogen fertilizer use.

Alternative Management Tools

In areas with highly vulnerable groundwater, the use of nitrogen fertilizer at the recommended rate, timing, source and placement of the nitrogen BMPs may not be enough to decrease the amount of nitrate leaching into groundwater to meet water quality goals. It is difficult to prevent nitrate from leaching to groundwater when growing high nitrogen demanding crops in vulnerable areas, and under unfavorable weather conditions the losses can be quite high. Even without adding fertilizer there are nitrogen losses from the mineralization of organic matter that can be significant. For these reasons, nitrate in groundwater is a very complex and difficult issue to address.

In these cases, the MDA encourages farmers to consider other options such as Alternative Management Tools (AMTs). AMTs go beyond the nitrogen BMPs through the use of other alternatives. The MDA can encourage and support the adoption of AMTs in targeted high risk areas (such as areas with sandy, coarse-textured soil or shallow bedrock). AMTs are defined as locally developed solutions for addressing groundwater nitrate problems that are implemented on a site-specific basis. The MDA will work toward selecting and/or developing tools to determine BMP effectiveness so that the information is available for consideration. If the BMPs can be shown to be inadequate, possible AMTs should be proposed by the local farmers and considered by the Advisory Committee.

AMTs implemented on a site specific basis for groundwater protection can be divided into four categories: utilizing new technologies (including precision agriculture); improving genetic diversity; increasing continuous cover (including diversifying crop rotation, perennial crops, & cover crops); and retiring crop land. Each of these categories will be discussed in further detail below. This summary does not include all the AMTs available, but rather provides examples to capture the range of options. The MDA has found that local stakeholders can suggest unique and effective AMTs, which can be successful in decreasing nitrate pollution in groundwater.

Utilizing New Technologies

Inefficient fertilizer use reduces economic returns for the farmer. Controlled (i.e. slow or delayed) release nitrogen fertilizer products have been available since the early 1970s and were developed to release nutrients gradually into the soil to improve crop use efficiency. When used correctly, this reduces the likelihood of environmental nitrogen loss via volatilization, denitrification, leaching or runoff and can result in greater yields compared to applying conventional nitrogen sources prior to planting (Blaylock et al. 2005). This technology can be beneficial to cropping systems in coarse-textured soils susceptible to leaching. For example, results from a Minnesota based study suggested that the use of polymer-coated

urea on potatoes grown in coarse-textured soils improved recovery of applied nitrogen and reduced nitrate leaching (Zvomuya et al. 2003, Wilson et al. 2010).

Precision Agriculture

Precision agriculture is a method of farm management that uses site specific information on soils, crops, nutrients, pests, and/or moisture to adjust practices to reflect in-field variability. It encourages better management of agricultural inputs including fertilizers, herbicides, seed and fuel, and is already practiced in some form by at least one-third of Midwestern farmers (Mulla 2013). The use of precision agriculture has the potential to increase production and nutrient use efficiency, thereby reducing nutrient leaching potential and/or over application (Hedley, 2014). Precision agriculture techniques often incorporate GPS technology to spatially reference the observed field variability. Research has shown that the use of GPS alone can increase nutrient use efficiency by 5 to 10%, and when combined with geographic information system (GIS) prescription maps, the efficiency can increase an additional 10 to 20% (Hedley 2014). Using variable rate fertilizer application technology, a field can be divided into management zones and different fertilizer rates can be applied based on soil nutrient concentrations, crop response, landscape position, soil moisture and soil type.

Variable rate irrigation is a type of precision agriculture technique that combines GPS technology with GIS field maps to increase irrigation efficiencies. This technique not only improves water use and reduces cost, but can also be used to minimize nutrient leaching losses by adjusting the frequency and duration of irrigation based on soil texture and moisture. Research has shown that drainage and runoff can be reduced by as much as 55% during the period of irrigation, decreasing the risk of nitrate leaching (Hedley 2014). This approach could be further expanded to apply nutrients to crops through irrigation water (i.e., fertigation), which also has the potential to provide highly efficient uniform or variable application to meet site-specific crop needs over the field area within the pivot. Although additional research should be pursued to confirm benefits to water quality within Minnesota, preliminary research has shown that soluble nitrogen fertigation of potatoes may reduce nitrate leaching in coarse textured soils; however, this may need to be used in conjunction with a cover crop to minimize fall leaching (Wilson et al. 2010).

Improving Genetic Diversity

Genetically engineered crops provide environmental benefits in addition to the economic benefits (NRC, 2010). Selection of crop varieties engineered with genes that have been shown to use nitrogen more efficiently, or that allow greater nitrogen uptake (e.g., larger root systems, quicker establishment) can reduce the amount of nitrogen susceptible to environmental loss, including leaching. On average, depending on the crop species and cultivar, at least half of the nitrogen fertilizer applied to the soil is lost to the environment (McAllister et al. 2012). Although additional research is needed for the continued development of new solutions to increase yields while maintaining or decreasing nitrogen fertilizer requirements, the agricultural industry can be the biggest contributor to the education and promotion of varieties that have successfully demonstrated lower nitrogen input requirements or loss reductions. By working together with crop advisors, consultants and seed dealers, farmers can evaluate the appropriate seed varieties for improved nitrogen use efficiencies within their soil types and management practices.

Increasing Continuous Cover

Landscapes have become increasingly homogenized over the last decade as fields formerly in small grains, grassland or pasture have been converted to corn and soybean (Wright and Wimberly 2013). Increased conventional row crop acreage and aggressive management can result in bare soils during

periods of high runoff and precipitation; resulting in increased nutrient loss and a larger opportunity for nitrate leaching. Identifying methods of adding continuous cover to portions of the landscape can reduce nitrogen inputs and/or increase uptake of soil nitrogen. Increasing continuous cover can be accomplished by diversifying crop rotations, adopting perennial cropping systems and incorporating cover crops.

Diversifying Crop Rotations

A majority of Minnesota farmers typically have a corn-corn or corn-soybean rotation. There are environmental benefits, including the prevention and reduction of nitrate leaching, to having crop rotations that incorporate crops other than corn and soybean. In addition to the environmental benefits, multi-year crop rotations can have net returns per acre as high as or higher than typical two-year rotations (Olmstead and Brummer 2008; Riedell et al. 2009; Coulter et al. 2011; Davis et al. 2012).

Alternative annual crops, such as small grains (e.g., oats, wheat, rye, barley) and oilseed crops (e.g., flax, canola, safflower, sunflower), can be included into crop rotations. These crops require less nitrogen and have greater nitrogen use efficiencies than corn and most other row crops. The incorporation of legume crops, such as alfalfa or clover into rotations, benefits soil health by increasing biomass and fixing atmospheric nitrogen into the soil, resulting in greater income stability once established (Davis et al. 2012). Although benefits may not be observed instantly, diverse cropping systems are valuable tools for improved net returns and soil health.

Perennial Crops

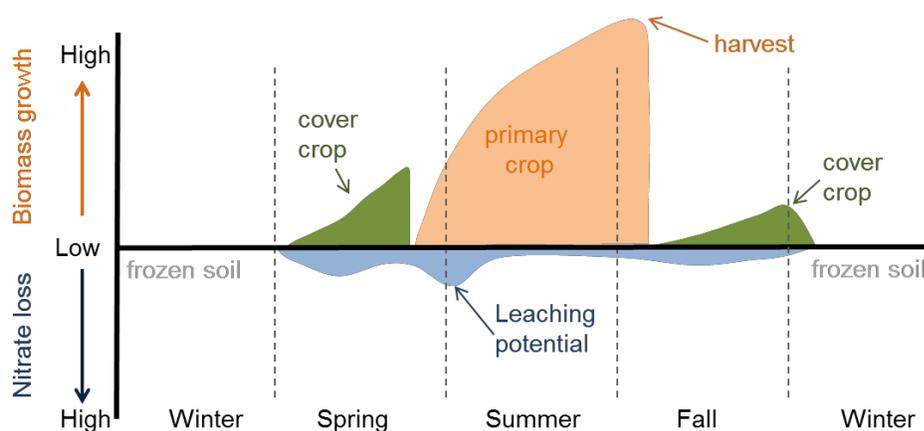
Perennial vegetation has been shown to be effective at scavenging nitrogen from the soil, as well as requiring lower nitrogen inputs. Perennial crops encompass perennial biomass or forage crops, and woody perennials, including shrubs and trees.

Unlike most row crops, perennial biomass or forage crops are not cultivated each year, which is beneficial for soil health and water quality, because it builds organic matter and reduces weed, insect and disease pressure. Long-term perennial forage used for haying or grazing can be economically competitive with corn and soybean production (Olmstead & Brummer 2008). However, in addition to being more labor intensive, it is important to acknowledge that hay production may require different planting and harvesting equipment. Perennial forages combined with grazing provide another option for farmers with livestock. Grazing lands are the principal source of forage for domestic livestock in Minnesota; therefore, managed grazing can be a profitable, productive, and an environmentally beneficial land use. In addition legumes fix nitrogen that will provide nitrogen credits to the next crop.

Cover Crops

When agricultural fields would otherwise be bare prior to crop emergence in spring or after fall harvest, cover crops can be planted to increase landscape diversity and provide seasonal soil cover. Cover crops include annually seeded grasses, small grains, legumes or forbs. Common cover crops conducive to Minnesota's colder climate include rye and other small grains, buckwheat, hairy vetch, radishes and brassicas. Cover crops improve water and soil quality by adding soil organic matter and reducing the opportunity for nitrogen leaching by increasing biomass production when the primary crop is not yet established or has been harvested (Figure 21; concept adopted from Heggenstaller et al. 2008).

Figure 21. Conceptual diagram representing nitrate loss in response to cover crop use



An obstacle for successful cover crop adoption in Minnesota is the small window of opportunity for establishment following the primary row crop harvest. Because of the short time frame between harvest and killing frost, cover crop adoption by Minnesota farmers using shorter season crop rotations have a greater likelihood of success. These short season crops, including corn silage, small grains, and vegetable crops like peas and sweet corn, are harvested early enough in the growing season to allow sufficient time for successful cover crop establishment in the fall. Successful cover crop stands may also be achieved by over-seeding into a standing corn and soybean field. Currently with existing cover crop technology, only 1/3 of cover crops are successfully established, though current Clean Water Funded research projects and U of M Forever Green Initiative are trying to change this.

Retiring Cropland

In Minnesota's most highly vulnerable groundwater areas, retiring cropland is an option for minimizing the nitrate leaching risk. Working together with local communities, the MDH and the MDA have had success in exchanging vulnerable cropland located within wellhead protection areas with less vulnerable land, allowing the land within the wellhead protection areas to be temporarily or permanently retired.

Retiring targeted portions of cropland into conservation easements may be the most environmental and economically beneficial option. Programs such as the Board of Water and Soil Resources Reinvest in Minnesota (RIM) Reserve Program and the Natural Resources Conservation Service (NRCS) Conservation Reserve Program (CRP) provide the landowner payment(s) to retire the land from production. The MDA will collaborate with other partners to identify specific areas where retiring cropland would be most appropriate. In addition, the Environmental Quality Incentives Program (EQIP) Source Water Protection (SWP) Initiative is a new NRCS funding and technical assistance opportunity (in partnership with the MDH) dedicated to protect and improve the quality of Minnesota's vulnerable drinking water resources used by public water suppliers.

Alternative Management Tool Implementation

The MDA encourages the exploration and use of Alternative Management Tools (AMTs) in highly vulnerable areas in order to protect and/or mitigate groundwater nitrate concerns. There are many options to consider when selecting the appropriate AMT, most importantly economics and site conditions. Farmers and their advisors/consultants will have the best insight on which AMTs might fit their farming

operation. The MDA will continue to work toward providing knowledge and developing resources regarding the effectiveness of the AMTs so that proper information is available for consideration.

Research on cropping systems that encourage the use of the nitrogen BMPs and AMTs has been funded by the MDA since 1989 through the Sustainable Agriculture Demonstration Grant Program, Specialty Crops Block Grants, the Agriculture BMP Loan Program, and more recently, the Clean Water Legacy Amendment funded Technical Assistance and Research programs. Recent attention, both locally and nationally, on the environmental benefits gained through the use of cover crops has increased the interest and funding for innovative cover crop projects. The MDA will continue to lead the state effort to explore, research, and promote new technology and improved crop diversity to protect our groundwater resources.

The MDA will identify opportunities to collaborate with other agencies, industry, and non-governmental organizations through existing programs and develop new partnerships. This includes internal MDA collaboration between divisions to determine where perennial cropping systems may support the development of biofuel and other progressive industry development efforts. The MDA will continue to work with other state and federal projects and programs.

Additionally, there is opportunity to explore partnerships with agricultural industry and organizations in order to foster the development and establishment of AMTs. One avenue could be investigating the potential for and development of markets that support implementation of the continuous cover practices discussed above. This could be pursued as a statewide effort or through the local Advisory Team process. Any and all of these avenues may be explored to advance the diversification of our cropping systems and promotion of new technologies.

PREVENTION PROGRAMS AND ACITIVITIES

Although the NFMP focuses on groundwater, the prevention implementation efforts will benefit surface water as well. A recent study evaluated nitrogen sources and loads to surface waters and found that agricultural contributions are a significant factor in many watersheds within Minnesota (MPCA 2013). It is recognized that there may be significant overlap of efforts to protect groundwater and surface water from nitrate and other agricultural non-point source contaminants; therefore prevention activities under the NFMP will be integrated to the greatest extent possible with other state, federal, local or private sector water protection programs.

Nitrogen Fertilizer Education and Promotion Team

As a first step in developing an integrated education and promotion program to prevent water resource degradation, the MDA will establish a Nitrogen Fertilizer Education and Promotion Team (NFEPT). The NFEPT will assist the MDA with the coordination of prevention activities and programs. The NFEPT provides expertise and advice on education and promotion activities the MDA should undertake.

The NFEPT should include the organizations listed in the statute (the MDA, MPCA, BWSR, SWCDs and Extension), as well as, University of Minnesota researchers and private sector agronomists, fertilizer retailers and/or crop consultants and advisors. Other agencies, such as the MDH, the DNR, the Minnesota Rural Water Association and the Natural Resource Conservation Service will be invited to participate as well. Additional interested parties are welcome to attend NFEPT meetings and contribute to discussions and planning activities. NFEPT meetings will be informal and facilitated by the MDA.

The NFEPT will meet at least once annually to review and design targeted educational and promotional prevention activities for water resource protection, including activities associated with the BMPs required as part of Minnesota Statutes, section 103H.151 or as part of the MDA's activities in response to groundwater areas of concern. The MDA and the NFEPT will:

- Look for ways to ensure an appropriate message about nitrogen BMPs and the risk to groundwater is integrated into education and outreach activities;
- Strive to ensure that available resources are used wisely to minimize any potential overlap between programs; and
- Support an adaptive management strategy where the recommended BMPs may change over time based on newly available information on potential sources or practices and tradeoffs between practices where there are multiple water quality concerns.

These efforts will make coordination and communication essential. It is anticipated that frequent, informal communications and interaction will occur between NFEPT members and MDA staff to plan and implement outreach activities.

Prevention programs and activities are delivered on statewide, regional, and local scales. Those activities that are the most effective in educating and promoting nitrogen BMPs and AMTs will vary over time and between locations. The NFEPT, or a regional or local team will identify education and promotion activities considered to be the most effective for a given time and set of conditions. These teams will operate on different scales (statewide, regional or local). In identifying education and promotion activities, these teams will specify the: 1) target audience, 2) educational and/or promotional objective, 3) delivery method, and 4) evaluation method. The NFEPT suggestions for education and promotion activities will be considered subject to available resources to be provided by the MDA as well as other partner contributions. Opportunities for cooperation among state agencies, representative NFEPT organizations, and other interested parties will be explored, as will opportunities for joint grant writing. Programs and activities that MDA is currently involved with are described below.

Local Water Management Planning

Local Water Management Plans (LWMPs), including comprehensive local water plans, county water plans, watershed district management plans, SWCD yearly work plans, watershed management organization plans, etc., are major tools for addressing water resource concerns at the local level. LWMPs will serve as a key vehicle for implementing the NFMP prevention activities. The BWSR has oversight to ensure that LWMPs are prepared and coordinated with existing local, and state efforts and that plans are implemented effectively. The MDA, via input on LWMPs, seeks to provide guidance to support the process, including nitrogen fertilizer management planning.

At the beginning of the LWMP update process, state agencies, including the MDA, are invited to provide input to the local government unit (LGU). The MDA has redeveloped a process to provide comment on LWMPs to LGUs and has identified nitrogen fertilizer management as a priority concern for groundwater in the state. The MDA provides guidance on recommended prevention activities to address this concern, as well as maps of counties depicting vulnerable areas. MDA staff are available to provide technical support for developing the plans. The LGU reviews all agency and public input, and then selects the concern(s) of highest priority to include in their LWMP. The county includes activities for each of the selected concerns and gives an estimated cost and timeline to implement. Once the plan is approved,

these activities become eligible for funding. The LGU may then apply for grants and other funding opportunities based on activities in their plan.

Groundwater Protection Programs

Groundwater protection is a shared responsibility between the MDA, MDH and DNR. The MDA's involvement in each of the agency's programs are described below.

Wellhead Protection

The MDH is responsible for administering the State's Wellhead Protection (WHP) program (Minnesota Rules, Part 4720) designed to prevent human caused contaminants from entering wells used by a public water supply. Community and non-community non-transient public water suppliers are required to develop a WHP plan to protect their source of drinking water based on the scientifically delineated recharge area of their well(s) and the vulnerability of the aquifer they use. The vulnerability of the wells and aquifer is based on well construction, geologic information and well water chemistry results. This information is used locally by the public water supplier to help them identify potential concerns, issues and activities that will be effective in protecting the water supply wells and aquifers from potential sources of contamination.

To gather local support, WHP teams are organized by the public water supplier (PWS) to discuss concerns and identify activities and resources needed to help protect the public water supply. WHP plans are updated every 10 years. Depending on the vulnerability of the public water supply and local concerns, WHP Teams can include a combination of local, state and federal government and others needed to develop and implement effective WHP plans. Public water suppliers are required to implement activities identified in the WHP Plan as part of on-going implementation efforts to protect their groundwater.

Through participation on WHP teams, the MDA provides expertise to local technical staff and farmers regarding the promotion and use of the nitrogen BMPs and other practices that can help reduce nitrogen loss to groundwater in WHP areas. Some examples of previous WHP area work includes on-farm test plots to try new technologies and nitrogen rates, development of nutrient management plans, promotion of nitrification inhibitors and time release fertilizers such as Environmentally Smart Nitrogen® (ESN), new crop varieties and alternative cropping systems, etc. These activities are frequently conducted in consultation with the U of M.

The MDA and the MDH will continue to coordinate and prioritize prevention activities to minimize nitrogen impacts in vulnerable WHP areas where agriculture land uses are present. Staff will meet on an on-going basis to regionally prioritize efforts based on local needs and water quality and agriculture land use changes that may warrant accelerated promotion and implementation of the nitrogen BMPs. Further priority will also be given to vulnerable WHP areas where groundwater quantity or quality is limited and there is a considerable population served by the PWS. The NFEPT may be able to provide assistance in the development of outreach materials to local WHP teams and county resource staff in the promotion of the nitrogen BMPs to farmers.

Groundwater Management Areas

The Minnesota legislature created groundwater management areas (GWMA) as a tool for the DNR to address groundwater quantity issues. The program is currently in a pilot project status. NFMP

implementation will be coordinated with the DNR-led GWMA projects where water supply and groundwater quality (nitrate) are concerns.

SURFACE WATER PROTECTION PROGRAMS

The MPCA is the lead state agency for implementing the federal Clean Water Act and state statutes to protect surface water quality in Minnesota. The MDA, in cooperation with the MPCA and other stakeholders, will ensure that nitrogen BMP education and promotion activities under the NFMP are coordinated with and support MPCA-based prevention and impaired waters response efforts. This will be accomplished by developing an integrated strategy to coordinate and prioritize prevention plans and activities for the NFMP and Watershed Restoration and Protection Strategy (WRAPS).

The State of Minnesota has adopted a Watershed Approach to address the water quality in each of the state's 81 major watersheds on a ten-year cycle. In the first four years of the cycle, a WRAPS document is drafted that includes water quality assessments, impairments, pollutant and stressor identification, total maximum daily load allocations, public participation and restoration and protection strategy development. Groundwater information and vulnerable areas will also be integrated into the discussions. A team is formed in each major watershed that includes local partners to provide input on the development of this document. The MDA will share nitrate data and other information available on research and existing practices.

Nitrate Total Maximum Daily Loads (TMDLs)

The MPCA, in cooperation with other agencies and organizations, implements a process for monitoring surface waters to determine if the waters are impaired (do not meet standards). The process establishes the total maximum daily load (TMDL) of a contaminant that a water body can carry without becoming impaired and allocates pollutant loads (commonly referred to as the TMDL process). The process also includes the development of an implementation plan to achieve necessary pollutant reductions.

The MPCA incorporated the Safe Drinking Water Act standard for nitrate-N (10 mg/L) into the State's Water Quality Standards. The nitrate standard is applied to Class 1 waters (groundwater and designated surface waters) in Minnesota. A number of Class 1 surface waters in the state are currently impaired due to high nitrate. The MPCA is currently preparing a draft standard for the protection of aquatic life in cold surface waters (Class 2). For nitrate impairments in surface water, the MDA will support the MPCA's investigation and planning efforts and promote the prevention activities in the NFMP.

There are instances where discharge of nitrate contaminated groundwater can be a significant source in surface water nitrate impairments. This is especially a concern in karst areas in southeastern Minnesota, outwash sand deposits in central Minnesota and in alluvial valleys across the state. In these vulnerable areas, groundwater is the primary source of flow during much of the year for many streams and rivers. In these cases, the MDA will continue to promote the prevention activities in the NFMP and will also support the MPCA in investigating and planning efforts to address nitrate impairments.

If a TMDL plan identifies specific nitrate concentration goals for groundwater in order to meet surface water standards, the MDA will work to the fullest extent possible with the MPCA, local government and other groups to survey current agricultural practices and promote the selected BMPs. The MDA will work with the MPCA to provide information related to the costs, benefits and limitations of the nitrogen BMPs to support modeling and development of TMDL allocations and implementation plans.

Nutrient Reduction Strategy

The Minnesota Nutrient Reduction Strategy (NRS) is the state's plan for addressing nitrogen (and phosphorous) contamination in surface water (MPCA 2014). The Nutrient Reduction Strategy sets Phase I nitrogen targets of a 35% reduction in the Mississippi River basin and a 10% reduction in the Red River Basin by 2025. Working together on implementing the NFMP and the Nutrient Reduction Strategy will help to reach these targets and to decrease nitrogen in groundwater and surface water. The Strategy notes that progress on nutrient efficiency and cover crops, among other areas, is key to decreasing nitrogen in surface water. As the Minnesota Nutrient Reduction Strategy and NFMP are implemented, the MDA and MPCA will collaborate to ensure that mutual goals and strategies are coordinated.

Chapter 9 : Monitoring and Assessment of Groundwater in Sensitive Areas

Nitrate monitoring and assessment of groundwater is targeted to sensitive groundwater areas of the state as identified in Chapter 4. The goal of monitoring and assessment is to develop a comprehensive understanding of the severity and magnitude of nitrate in groundwater drinking water wells (public and private). Nitrate monitoring activities include identifying and selecting wells from a designated area, collecting and testing the water samples, obtaining and summarizing the results and conducting follow up site visits, if necessary, to confirm the results. Nitrate assessment involves establishing and reporting the overall pattern in wells within designated areas. Monitoring and assessment initiates the NFMP process and forms a basis for determining the appropriate level of action (Prevention or Mitigation).

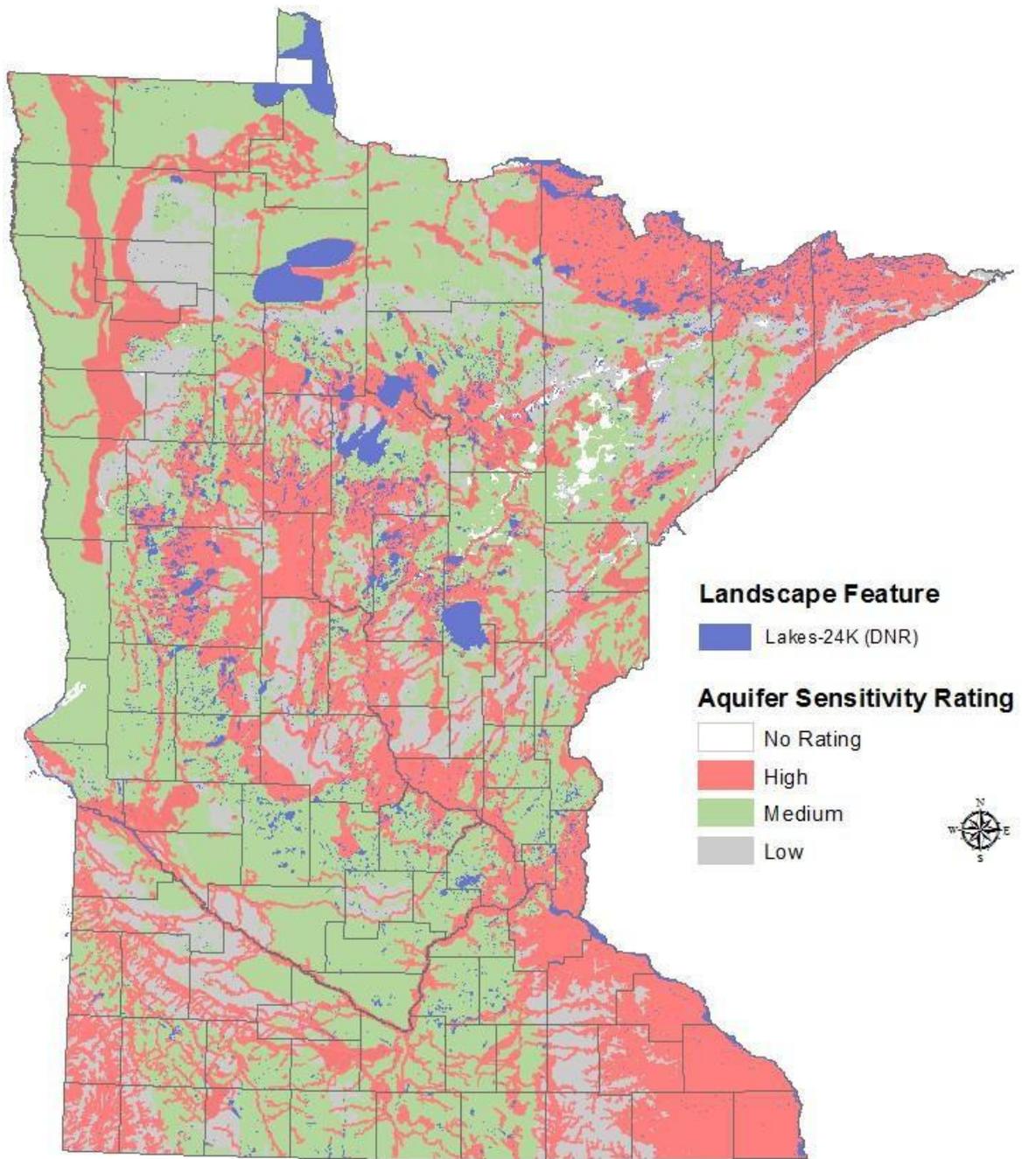
MONITORING STRATEGY

There are separate nitrate monitoring strategies for private and public wells due to the fact that the MDA administers the private well monitoring program and the MDH administers the public well program.

PRIVATE WELL MONITORING

The MDA has established a Township Testing Program to determine current nitrate concentrations in private wells on a township scale. Monitoring will focus on areas of the state where groundwater nitrate contamination is more likely to occur. The MDA will perform the initial search based on all available private drinking water wells in hydrogeologically vulnerable areas, generally using the township as the primary geographic boundary for sampling. The selection of townships will be based on groundwater vulnerability information, the proportion of land in row crops and other data which may indicate an increased or decreased risk of nitrate in water wells. Figure 22 illustrates potential groundwater vulnerable areas. The MDA estimates 250-350 townships may be targeted for nitrate testing. This number may change based on site specific conditions determined after additional investigation. It is anticipated that over 70,000 private wells will be offered nitrate testing as a part of this assessment.

Figure 22. Water table sensitivity



0 15 30 60 90 120 Miles

Prepared by the Minnesota Department of Agriculture 2012



During the township selection process, the MDA will consult with the local government unit(s) (county, Soil and Water Conservation District, water management organization, rural water authority, etc.), consider all relevant information (described in Chapter 3) and review any existing groundwater nitrate data from private and public wells. If nitrate data is already available, recent and meet the well screening requirements, the MDA will consider the information on a case-by-case basis to decide if it can be used for the NFMP process. Based on the review of this information, the MDA may decide that collecting additional groundwater nitrate data is necessary in order to accurately characterize the drinking water quality in an area. If additional water sampling and testing is needed, the MDA will partner with the local government unit to conduct private well testing via the homeowners.

Well owners will be contacted via letter, inviting them to participate in a free analysis for nitrate concentrations in their wells. If the well owner agrees to participate, they will be asked to fill out a survey about their well (construction type, well depth, age, etc.) and mail it in. Each participant will then receive a sample kit with instructions on how to take the sample and where to send it for analysis.

Samples will be analyzed for nitrate concentration using a certified lab if the financial resources are available. Otherwise, UV spectrophotometers will be used and local government staff will be trained to perform the analysis. (MDA has 15 units scattered across the state and encourages local partners to use them) A Quality Assurance Quality Control (QA/QC) protocol will be established and utilized.

Follow up site visits will be conducted for wells with high nitrate-N results (> 5mg/L). Site visits will include resampling and a potential nitrate source inventory to confirm well construction information and to assess whether nitrate in the well is likely from a nitrogen fertilizer and agricultural non-point source (see Appendix I: MDA Private Well Sampling and Site Inventory for details). Wells that may be vulnerable to other nitrogen sources, such as feedlots, should be screened and removed from consideration.

The MDA will notify and consult with other agencies (DNR, MDH, MGS) and local government unit(s) about the project. The MDA will request available technical data related to land use, hydrogeologic sensitivity, groundwater flow, capture zones and travel times, etc. to determine scope and extent of the problem area and potential source areas. Age dating of the aquifer(s) or other similar tests may be conducted if necessary.

PUBLIC WELL MONITORING

The MDH is responsible for monitoring contaminants in public wells within wellhead protection areas (WHPAs), including nitrate, as discussed in Chapters 3, 4, and 8. The MDA will coordinate with the MDH to obtain monitoring data from public water suppliers that are already conducting quarterly nitrate monitoring. Water samples collected from these wells will be evaluated by the MDA and the MDH to determine if they meet the screening criteria (i.e. the monitoring well data is determined to be representative of nitrogen fertilizer use within the WHPA) and are the most representative of the raw water. The samples could include raw water, finished water, or water from other area wells; however raw water is more appropriate for understanding actual nitrate conditions. If the opportunity exists, monitoring of private wells within WHPAs will be considered as well.

STATEWIDE AQUIFER MONITORING NETWORK

The MDA has initiated discussions through the State Interagency Groundwater Team about developing a statewide groundwater monitoring network of permanent, non-private wells which could be used to evaluate water quality for each vulnerable aquifer across the state. The goal of this network will be to

provide statistically defensible water quality concentration and trend data which can be used for evaluating nitrate impacts. However, it will be several years before this information would be available.

ASSESSMENT STRATEGY

Following the assembly of nitrate monitoring data, the MDA will conduct an assessment based on data in areas of concern. Nitrate concentration data from private and public wells will be assessed based on separate criteria described below in order to determine whether the area of concern continues in a “Prevention” mode or proceeds into a “Mitigation” mode. The NFMP Mitigation mode is comprised of four implementation levels. Each successive level represents an increase in implementation effort.

The determination of the mode and level is primarily based on nitrate concentrations, trends, and adoption of the BMPs. Consideration will also be given to significant changes in land use, the size of the area, the severity of the problem, and other factors that might be expected to influence nitrate levels. It is important to recognize that there can be significant variability in nitrate concentrations over time and distance as a result of the complexity and unique characteristics of each site. Therefore, decision makers will need to use best professional judgment and may deviate from this guidance if deemed appropriate based on site specific conditions and circumstances.

PRIVATE WELL ASSESSMENT

The assessment of private wells will be based on existing data and/or the results of the MDA well water monitoring efforts. The initial assessment will result in determining the proper mitigation level as shown in the tables below.

Private Well Assessment Criteria:

- The area will be determined to be in Prevention mode if the groundwater nitrate concentrations are unknown or below the Level 1 Mitigation mode criteria.
- Mitigation Level 1 is reached when 5% of the wells have nitrate concentrations greater than the Health Risk Limit (HRL) or 10% of the wells have groundwater nitrate-N concentrations greater than 7 mg/L.
- Mitigation Level 2 is reached when 10% of the wells have nitrate concentrations greater than the HRL and, the BMPs are being adopted or the response effort will be initially promoting BMP adoption.
- Mitigation Level 3 is reached when 10% of the wells have nitrate levels greater than the HRL and BMPs are not being adopted.
- Mitigation Level 4 is reached when 15% of the wells have nitrate levels greater than the HRL and BMPs are not being adopted.

Table 10 depicts the private well Prevention and Mitigation modes and criteria. After the first round of private well monitoring is completed, the results will be evaluated using the criteria listed under Prevention and Mitigation Levels 1 and 2 only. The criteria for Mitigation Levels 3 and 4 will be considered in subsequent monitoring and assessment rounds.

Table 10. Private well criteria used to determine Prevention and Mitigation modes and levels

Groundwater Nitrate Concentration Criteria	Unknown or Below Mitigation Level 1	5% of wells > HRL or 10% of wells > 7 mg/L NO ₃ -N	10% of wells > HRL	10% of wells > HRL	15% of wells > HRL
BMP Adoption Criteria	Unknown/NA	Unknown or BMPs Adopted	BMPs Adopted	BMPs Not Adopted	BMPs Not Adopted
Mode	Prevention	Mitigation			
Level	NA	1	2	3	4
Status	Voluntary	Voluntary	Voluntary	Regulatory	Regulatory

NOTE: The Health Risk Limit (HRL) for nitrate-nitrogen in Minnesota is 10 mg/L.

Following the determination decision, the boundaries of the area(s) of concern may need to be reevaluated. The MDA may consider combining townships for the purpose of developing an effective and efficient response.

Following the initial round of monitoring and assessment for private wells, the MDA will attempt to organize subsequent monitoring and assessment rounds in parallel to MPCA's 10 year water quality assessment cycle and revisit the areas that have not developed a long term monitoring or mitigation plan, or updated it the past ten years.

PUBLIC WELL ASSESSMENT

The assessment of public wells in wellhead protection areas will be based on nitrate data that has been collected by the public water supplier. These areas may include only one or very few public wells; therefore, the percentage criteria used for private wells is not applicable. The MDA and the MDH will assess the data using the nitrate criteria described below. The criteria are based on Safe Drinking Water Act standards. Using the available data, the MDA will use best professional judgment in determining the mitigation level, in consultation with the MDH.

Public Well Assessment Criteria:

- The wellhead protection area will be determined to be in Prevention mode if the groundwater nitrate-N concentrations are unknown or below 5.4 mg/L (Level 1 Mitigation mode criteria), which is the value at which additional monitoring is currently required under the Safe Drinking Water Act.
- Mitigation Level 1 is reached when the well(s) are above 5.4 mg/L nitrate-N.
- Mitigation Levels 2 and 3 are reached when the nitrate contamination in the raw water is projected to exceed the drinking water standard of 10 mg/L nitrate-N in 10 years or less. Consideration will also be given to significant changes to land use, the size of the wellhead protection area and other local factors which might be expected to increase or decrease groundwater nitrate levels. Where possible, trend studies will be conducted by doing statistical analysis of time series data. In cases where limited or conflicting data exist, best professional judgment will also be applied.

- If the BMPs are being adopted, the area will be in a Level 2.
- If BMPs are not being adopted the area will be in a Level 3.
- Mitigation Level 4 is reached when the well(s) are above 9 mg/L and the BMPs are not being adopted.

Table 11 depicts the public well Prevention and Mitigation modes and criteria. After the first round of public well monitoring is completed, the results will be evaluated using the criteria listed under Prevention and Mitigation Levels 1 and 2 only. New sites may be assessed at Level 1 or 2. The criteria for Mitigation Levels 3 and 4 will be considered in subsequent monitoring and assessment rounds.

Table 11. Public well criteria used to determine Prevention and Mitigation modes and levels

Groundwater Nitrate Concentration Criteria	Unknown or Below Mitigation Level 1	Wells > 5.4 mg/L NO ₃ -N	Projected to exceed 10 mg/L NO ₃ -N in 10 years or less		Wells > 9 mg/L NO ₃ -N
BMP Adoption Criteria	Unknown/NA	Unknown or BMPs Adopted	BMPs Adopted	BMPs Not Adopted	BMPs Not Adopted
Mode	Prevention	Mitigation			
Level	NA	1	2	3	4
Status	Voluntary	Voluntary	Voluntary	Regulatory	Regulatory

NOTE: The Health Risk Limit (HRL) for nitrate-nitrogen in Minnesota is 10 mg/L.

Chapter 10 : Mitigation

MITIGATION GOAL, STRATEGY AND PRIORITIZING EFFORTS

MITIGATION GOAL

The goal of mitigation is to minimize the source of pollution to the greatest extent practicable and, at a minimum, reduce nitrate contamination to below the Health Risk Limit (HRL) so that groundwater is safe for human consumption.

MITIGATION STRATEGY

The mitigation strategy is based on the prevention strategy, but implemented over a defined area and at a higher level of effort and intensity. Mitigation will be accomplished by:

- Intensifying and targeting education and outreach (preventative) efforts via a multi-level approach;
- Using/refining the existing nitrogen BMPs, developing and implementing Alternative Management Tools (AMTs) in areas where conventional BMPs may not provide enough protection;
- When appropriate, exercising regulatory authority provided in the Groundwater Protection Act.

This strategy will be implemented considering regional and local conditions. Geology, crop type, groundwater vulnerability and the type of wells (public or private) vary throughout the state. Both BMPs and AMTs can be used at each and every mitigation level.

The mitigation process is designed with two goals in mind. First, to ensure that the appropriate nitrogen fertilizer BMPs are adopted, using either a voluntary, or, if necessary, a regulatory approach. Second, to actively involve local farmers and the local community in problem solving to develop effective solutions to local nitrate problems. Figure 23 provides an illustration of how the combination of nitrate levels and BMP adoption results in identification of the appropriate mitigation level.

The mitigation criteria is different for private wells versus public water supplies. Specific criteria are shown in in Figure 24 and Figure 25 as well as Table 12 and Table 13 (repeated from Chapter 9). Additional narrative is provided in Chapter 9.

Figure 23. Mitigation levels based on nitrate levels and BMP adoption

Revised NFMP: Clear Definition of Prevention & Mitigation Levels for Localized Responses

	Prevention	Level One	Level Two	Level Three	Level Four
Nitrate Levels	<i>Increasing</i>				
BMP Adoption	<i>Acceptable or Undetermined</i>			<i>Not Acceptable</i>	
Regulatory Status	<i>Voluntary</i>			<i>Regulatory</i>	

Figure 24. Mitigation process for private wells

Criteria within the “Mitigation” Process for Private Wells (Township Scale)

	Level One	Level Two	Level Three	Level Four
Nitrate Levels	<i>Increasing</i>			
% Number of Private Wells	5% or More Above 10 mg/L NO ₃ -N <u>OR</u> 10% or More Above 7 mg/L NO ₃ -N	10% or More Above 10 mg/L NO ₃ -N		15% or More Above 10 mg/L NO ₃ -N

Figure 25. Mitigation process for public water supplies

Criteria within the “Mitigation” Process for Public Water Supplies

	Level One	Level Two	Level Three	Level Four
Nitrate Levels				
Nitrate Conc. mg/L	5.4 mg/L NO ₃ -N	Nitrate Levels Expected to Exceed 10 mg/L NO ₃ -N in 10 Years or Less		9.0 mg/L NO ₃ -N

Table 12. Private well criteria used to determine Prevention and Mitigation modes and levels

Groundwater Nitrate Concentration Criteria	Unknown or Below Mitigation Level 1	5% wells > HRL OR 10% wells > 7 mg/L NO ₃ -N	10% wells > HRL	10% wells > HRL	15% wells > HRL
BMP Adoption Criteria	Unknown/NA	Unknown or BMPs Adopted	BMPs Adopted	BMPs Not Adopted	BMPs Not Adopted
Mode	Prevention	Mitigation			
Level	NA	1	2	3	4
Status	Voluntary	Voluntary	Voluntary	Regulatory	Regulatory

NOTE: The Health Risk Limit (HRL) for nitrate-nitrogen in Minnesota is 10 mg/L.

Table 13. Public well criteria used to determine Prevention and Mitigation modes and levels

Groundwater Nitrate Concentration Criteria	Unknown or Below Mitigation Level 1	Wells > 5.4 mg/L	Projected to exceed 10 mg/L NO ₃ -N in 10 years or less		Wells > 9 mg/L NO ₃ -N
BMP Adoption Criteria	Unknown/NA	Unknown or BMPs Adopted	BMPs Adopted	BMPs Not Adopted	BMPs Not Adopted
Mode	Prevention	Mitigation			
Level	NA	1	2	3	4
Status	Voluntary	Voluntary	Voluntary	Regulatory	Regulatory

NOTE: The Health Risk Limit (HRL) for nitrate-nitrogen in Minnesota is 10 mg/L.

PRIORITIZING MITIGATION EFFORTS

Mitigation activities require significant staff resources to implement and the MDA and partners may need to prioritize its work load in consideration of the following:

- Private wells in areas with the highest nitrate concentrations, and with the greatest numbers of wells exceeding the HRL;
- Public wells (in wellhead protection areas) with the highest concentrations of nitrate relative to the HRL, and the trend analysis before exceeding the HRL;
- Size of population potentially affected;
- Significant changes to land use, the size of the area and other factors, which might be expected to increase or decrease nitrate levels; and
- Local government units and agricultural communities with demonstrated willingness and capacity to participate and provide support, as well as the probability that successful implementation of mitigation activities will cause the groundwater nitrate concentrations to decrease in a reasonable amount of time.

The MDA will consider input from other agencies in developing priorities.

MITIGATION IMPLEMENTATION

Based on past experience implementing the NFMP over the last twenty years (see Chapter 1, Appendix A and B), the MDA has developed a process for responding to local areas with elevated nitrate. The mitigation process is the same for addressing nitrate in both private and public wells. All sites will start in a voluntary level (Level 1 or 2), determined using the mitigation criteria discussed in Chapter 9, and will only move to a regulatory level (Level 3 or 4) if the BMPs are not being adopted.

MITIGATION PROCESS OVERVIEW

The mitigation process generally consists of the following activities listed in a typical chronological order of implementation; however each site is unique and actual activities may vary depending upon specific considerations for each site. This is intended for general guidance rather than instructional. This process begins once a nitrate problem has been identified and a potential problem confirmed;

1. Form local Advisory Team (Advisory Team);
2. Select a project lead and develop a work plan;
3. Establish a local nitrate monitoring network capable of producing long-term trends;
4. Hold a public information meeting(s) for farmers and other interested parties;
5. Select the right set of nitrogen BMPs to implement in the area using U of M guidance;
6. Conduct an initial survey of BMP adoption;
7. Consider Alternative Management Tools (AMTs) in high risk areas;

8. Assess the need for demonstration projects based on results from BMP adoption survey;
9. Develop a plan for educational activities based on results from BMP adoption survey;
10. Assist with obtaining funding for implementing the selected BMPs and AMTs;
11. Work with farmers to implement selected BMPs;
12. Conduct a follow up survey of BMP adoption after three growing seasons of implementation;
13. Evaluate BMP adoption; and
14. Determine appropriate mitigation level using nitrate concentration and BMP adoption criteria.

MITIGATION PROCESS IN DETAIL

The following provides details of each of the above steps for the localized areas where groundwater is impacted by nitrate have been identified.

1. Form local Advisory Team (Advisory Team).

The role of the Advisory Team is to advise the MDA regarding appropriate response activities for the area and to support implementation of these activities. The team(s) will help develop and implement locally viable solutions to address elevated nitrate.

The Advisory Team will consist of people who are from the area, including farmers, representatives of local groups/organizations, public water supply systems (in wellhead protection areas), and government staff and/or professionals who can provide technical or financial support. The majority of members will be local farmers and their crop advisors/consultants. The size and composition of the team will vary depending upon the size of the area, the nature of the problem and availability of local stakeholders; however it will likely be no more than 15 -20 people. The MDA will develop guidance that outlines the roles and responsibilities of the Advisory Team.

Local farmers and their crop advisors/consultants are critical in helping develop and implement appropriate activities to address elevated nitrate in their groundwater because they control the land use. The mitigation strategy is constructed specifically to involve the local agricultural community in problem solving with the opportunity to avoid regulations if voluntary actions are taken.

Advisory Team decisions will not be determined by majority vote, but rather the team will seek consensus and common ground. The team will advise the MDA in an open process. All members' comments and recommendations will be considered. The MDA will be responsible for final determinations of potential regulatory actions and will seek to provide consistency in decision making for similar situations/areas.

It is highly recommended that one member of the Advisory Team be selected to be the point person for the project. This person would be the liaison between the agricultural community and the technical/government staff and should be present for on-farm communications with farmers. It is vital that they be agriculturally literate and possess excellent communication skills.

The MDA will form the team(s) in level 2 or above in consultation with local leaders. The MDA will support the formation of Advisory Teams in level 1. A formal determination of level will be placed on the MDA's website as data become available.

2. Select a project lead and develop a work plan.

There are two options for project leadership in mitigation. One option is for the MDA to administer and lead the process. The other option is for a local entity to lead the process with the MDA as the project administrator. A local entity could be a county, Soil and Water Conservation District, watershed management organization, or township in a private well contamination situation or a municipality (city) in a public well contamination situation. These governing bodies have proven to be the most effective and efficient way to accomplish the prevention and mitigation goals of the NFMP. The leadership role determination will be based on several factors including the capacity and resources at the local level and willingness to participate.

The MDA, in cooperation with the local government unit and the Advisory Team, will develop a work plan to define and guide expectations, tasks, responsibilities, timelines, funding needs, etc. for the project. Work plan templates will be provided to local government units.

3. Establish a local nitrate monitoring network capable of producing long-term trends.

A long term local nitrate monitoring network will be established based on the set of private wells (or possibly public wells in wellhead protection areas) sampled during the Monitoring and Assessment Process (Chapter 9) using the same sampling procedures and analytical protocol. This network will be used to collect routine nitrate samples from private wells. The Advisory Team will propose monitoring network recommendations to the MDA. Monitoring data from this network will be maintained by the MDA and made available through reports, data requests and on the MDA website.

4. Hold a public information meeting for farmers and other interested parties.

It is important to create awareness about nitrate issues; therefore hosting a public meeting is a critical early step. Based on the Advisory Team findings, the meeting will provide as many facts as are known about the current situation. An expected outcome for the meeting will be a dialogue regarding appropriate BMPs for the area, barriers to adopting those BMPs and possible solutions. There may be significant economic or operational barriers to adopting the BMPs. Adopting new BMPs might require a substantial change in practices with significant costs or risks for implementation. These barriers may vary significantly between regions and individual farming operations.

5. Select the right set of nitrogen BMPs to implement in the area using U of M guidance.

The Advisory Team will provide input to the MDA on the BMPs that are appropriate for the area. The BMPs will be selected by reviewing the appropriate U of M nitrogen BMP recommendations, information from the public meeting(s), and local soils and cropping systems data. This set of BMPs will be the basis for measuring BMP adoption.

6. Conduct an initial survey of BMP adoption.

An initial survey of the selected BMPs will be completed by the MDA to determine adoption rates for nitrogen fertilizer rate, timing, source and placement. These practices are interrelated and each should be evaluated in the context of the other three. Other practices may be considered in the survey. It will also be important to assess barriers to adopting the BMPs.

There are a number of survey options, ranging from resource intense in-person interviews to less resource intense mail surveys. The type of survey used will be subject to available resources and priority. The survey type and intensity may be different based on the mitigation level with a level 1 survey being the least intense. One possible survey format could be a simplified version of the MDA's FArm Nutrient Management Assessment Program (FANMAP), which is a method for conducting in-person field-by-field surveys of fertilizer management practices. The MDA has also developed other regional survey techniques and is investigating remote sensing and field scale assessment methods for evaluating appropriate nitrogen fertilizer use practices.

Farmer participation in surveys is important to ensure complete and accurate data. In situations where farmer participation is limited, the Advisory Team should evaluate whether the available information supports a conclusion that the BMPs are being adopted. There should be sufficient survey or other technical data to support this conclusion.

Information collected by the MDA in relation to the practices on a specific farm is confidential and protected by Minnesota Statutes (section 13.643, subdivision 7). The information will be aggregated by the MDA and reported publically unless it would reveal the practices on an individual farm. Whether reported or not, the information can be used to support site specific decisions. This initial survey of practices will be reviewed by local farmers and the Advisory Team for accuracy.

7. Consider Alternative Management Tools (AMTs) in high risk areas.

The critical challenge for addressing nitrate in groundwater from agricultural fertilizer is that even the most responsible management practices result in some nitrogen loss. It is difficult to prevent nitrate from leaching to groundwater when growing high nitrogen demanding crops in vulnerable areas, and under unfavorable weather conditions the losses can be quite high. Even without adding fertilizer there are nitrogen losses from the mineralization of organic matter that can be significant. For these reasons, nitrate in groundwater is a very complex and difficult issue to address.

Various sources strongly suggest that the full adoption of the current nitrogen BMPs (rate, timing, source and placement of fertilizer) will reduce nitrate leaching losses by 15 to 25% (under normal climatic conditions). It is important to note that farmers have already integrated many of these practices into their operations over the past twenty years. Under Minnesota soils and field conditions, nitrate concentrations can exceed the 10 mg/L drinking water standard under row crop agricultural fields even when no commercial nitrogen fertilizer is applied. Nitrate losses of 8 to 20 pounds per acre per year are typical under non-fertilized corn-soybean rotations. Nitrate losses under alfalfa or conservation land (Conservation Reserve Program) are typically 1 pound per acre which is a 95% or greater reduction in nitrate leaching (Sawyer and Randall 2008; Randall and Sawyer 2008; MPCA 2013; Upper Mississippi Sub-basin Hypoxia Nutrient Committee 2008).

The MDA does not have the authority, nor do we believe it is appropriate, to require farmers to grow certain crops. But the MDA can encourage and support the adoption of AMTs in targeted high risk areas (such as areas with sandy, coarse-textured soil or shallow bedrock). AMTs (discussed in detail in the Chapter 8) are defined as locally developed solutions for addressing groundwater nitrate problems that are implemented on a site-specific basis.

The MDA will work toward selecting and/or developing tools to determine BMPs effectiveness so that the information is available for consideration. If the BMPs can be shown to be inadequate, possible AMTs should be proposed by the local farmers and considered by the Advisory Committee.

Mitigation level activities must include the use of BMPs, but AMTs are not required. However, the distinction is made between BMPs and AMTs since BMPs are the general basis for potential regulations under the Groundwater Protection Act, while AMTs are not. Therefore BMPs and AMTs are given separate standing, even though both may be important contributors in addressing groundwater degradation.

8. Assess the need for demonstration projects based on results from BMP adoption survey.

The MDA, in cooperation with the Advisory Team will consider the need for demonstration projects. On-farm nitrogen rate demonstration projects like the MDA's Nutrient Management Initiative establish nitrogen rate strips that maintain a minimum of 30 pound nitrogen rate difference and also require a short check strip where little or no nitrogen is applied. At the end of the season farmers are provided with an economic analysis based on their actual nitrogen costs. AMT demonstration projects should also be considered.

9. Develop a plan for educational activities based on results from BMP adoption survey.

The Advisory Team will assist the MDA in developing an educational plan to target the selected BMPs and address barriers. The Advisory Team will specify its target audience, educational and/or promotional objectives, as well as the delivery and evaluation methods to be used. The Advisory Team will also help identify and determine who will be responsible for implementing the education program. At the state level, the Nitrogen Fertilizer Education and Promotion Team (NFEPT) may address targeted educational opportunities that can be tailored to local areas by the Advisory Teams. The education plan can include activities listed in the Prevention Chapter.

The MDA will provide guidance to the Advisory Team and the local government unit such as technical assistance, factsheets, links to information on the MDA website, and other materials.

10. Assist with obtaining funding to implement the selected BMPs and AMTs.

The MDA staff and/or qualified representatives will help farmers and the local government unit to obtain funding to implement the selected BMPs and AMTs. Funding such as grants, loans and cost share from local, state and federal sources may be pursued. Detailed information on selected practices, estimated cost to implement, schedule of work, etc. will be prepared.

11. Work with farmers to implement selected BMPs.

MDA will inform farmers of the selected BMPs prior to the beginning of the growing season, preferably in the summer or fall of the year before implementation. Farmers should be allowed three growing seasons (length of a typical crop rotation) following the selection and promotion of selected BMPs to adopt them. The MDA staff and/or qualified representatives will work with farmers to implement selected BMPs. One-on-one meetings between farmers and technical staff (SWCD, Natural Resources Conservation Service, county, etc.) and/or the project point person will be conducted to discuss mitigation level goals and review their farming operation in the context of the selected BMPs.

12. Conduct a follow up survey of BMP adoption after three growing seasons of implementation.

After three growing seasons of BMP implementation has occurred, the MDA will conduct a follow up survey of BMP adoption.

13. Evaluate BMP adoption.

One of the most challenging components of the NFMP is evaluating BMP adoption. This is because each farm operation is unique and the selected BMPs may vary depending upon the soils, topography, cropping system, economic risk and individual preferences of farmers. Nevertheless, with careful review, it is possible to assess reasonable and appropriate BMPs for a particular crop, setting and rotation. The review can also identify practices which are clearly inappropriate for protecting water resources.

Each of the BMPs will be evaluated as pass-fail, in context of the other practices. There can be a great deal of variability in farm management decisions from year to year, depending on the weather, so there are challenges to consistently implementing the practices. Few farm operations can realistically implement all of the practices every year. Therefore, the selected BMPs need to be implemented on approximately 80% of the available row crop land in order to meet the BMP adoption criteria. This value provides a benchmark for BMP implementation and allows for evaluation on a site specific basis. There must be information to support that BMPs are being adopted.

14. Determine appropriate mitigation level using nitrate concentration and BMP adoption criteria.

In order to evaluate mitigation level activities the following conditions must be met:

- Complete at least two rounds of private well sampling (sample rounds must be from different years). Within wellhead protection areas, public well data will be used in coordination with the MDH;
- Allow three growing seasons to implement the selected BMPs;
- Complete BMP adoption surveys prior to and after implementation and prior to considering a regulatory level (Level 3 or 4).

The MDA will review available nitrate concentration (and trend data, if available) and BMP adoption survey data to determine if the area moves up or down a level. When evaluating the change in nitrate in groundwater, the MDA will consider lag time to determine if the BMPs implemented have been effective. Lag time is the period from when a practice is adopted to when a change in groundwater quality could be expected. Over a short time period it is very unlikely that groundwater monitoring data would be sufficient to link results to BMP effectiveness; demonstration site and modeling are much more likely to answer that question. The lag time can be less than a year to decades depending upon a number of factors including soil type, geology, depth to groundwater, the volume, intensity and timing of precipitation, as well as field practices such as tillage and crop type. In dry years, there may be virtually no nitrate leaching to groundwater, while heavy precipitation after several dry years could result in a large quantity of nitrate leaching past the root zone. The lag time should be based on a technical assessment of water travel times from the land surface to the water table using modeling, soil sampling, age dating of groundwater or other suitable methods. The estimated lag time should be based on the best available data, with consideration of historical local weather events. Nitrate leaching models may be helpful as well as monitoring residual soil nitrogen in the root zone.

The MDA recognizes the need to better understand the relationship between land-use practices and changes in groundwater nitrate levels. The MDA may utilize or develop tools such as models, field hydrologic tests, field sampling, tracers, etc. that can provide the information to show the link between

BMP implementation and water quality. The MDA is supportive of continuing research on accurate quantification and prediction of nitrogen leaching losses to groundwater under field conditions.

Downgrading the mitigation level will be conducted using similar considerations. A site may be downgraded to a lower level if nitrate monitoring results indicate that nitrate has continuously improved to below the nitrate criteria for the current level. Once a site has been categorized as Level 3 or 4, it generally should not be removed unless nitrate data are below the minimum nitrate criteria with an appropriate margin of assurance. A site may be downgraded to a lower level if the 90th percentile from the monitored wells show a stable or downward trend for three consecutive sampling events over a period of a least three years and sustained nitrate monitoring results are at least 10% below the nitrate criteria. This will help to ensure the reduction is stable. The MDA will use best professional judgment in making a final determination.

ADDITIONAL MITIGATION ACTIVITIES TO CONSIDER

The mitigation process described above provides a layout of the basic activities. The Advisory Team may explore additional activities to implement in the mitigation process. The MDA has provided a set of examples below for Levels 2-4; Level 1 is not listed because the effort needed is less than for the other levels. The Advisory Team may offer other alternatives for consideration by the MDA.

ACTIVITIES TO CONSIDER FOR LEVEL 2

- Collect irrigation well water samples to augment the long-term private well monitoring network data and to provide information on nitrogen crediting for determining proper nitrogen fertilizer application rates;
- Proper crediting for all nitrogen sources;
- Record keeping of nitrogen use, including rates, crediting of nitrogen sources, timing, placement and source;
- Recommend and support developing irrigation, water management or nutrient management plans;
- Demonstration sites;
- Annual farmer updates.

ACTIVITIES TO CONSIDER FOR LEVEL 3 (IN ADDITION TO LEVEL 2 ACTIVITIES)

- The MDA or approved representative collects irrigation well water samples;
- Farmers report on their fertilizer management practices to the MDA, including nitrogen fertilizer and/or manure application rates, timing, sources, crediting and placement;
- Require irrigation, water management and/or nutrient management (including manure) plans developed and/or certified by a qualified professional;

- Farmers attend at least one MDA approved education activity such as a meeting, field day, clinic and/or workshop.

ACTIVITIES TO CONSIDER FOR LEVEL 4 (IN ADDITION TO LEVEL 3 REQUIREMENTS)

- Mandate specific nitrogen management practices.

DEVELOPMENT OF WATER RESOURCE PROTECTION REQUIREMENTS (WRPRS, OR RULES)

If it is determined that an area will move to a regulatory mitigation level (Level 3 or 4), the MDA will implement a rule(s). The Groundwater Protection Act grants the MDA authority to develop formal rules called Water Resource Protection Requirements (WRPRS) (Minnesota Statutes, section 103H.275).

Actions should be carefully targeted to restrict practices which are clearly inappropriate, or mandate practices that are very effective at protecting groundwater, can be successfully enforced at a reasonable cost, and are economically viable. Any regulatory activity should be implemented only after a reasonable period of time has been allowed for notification, education and voluntary adoption of the selected BMPs.

There are currently no rules (WRPRS) in place. Beginning in 2015, the MDA will develop a rule to address statewide and area specific nitrate issues. Appendix J provides some guidance in development of these rules. The Administrative Procedures Act (Minnesota Statutes, section 14) identifies requirements for rule development and implementation.

The new rule will generally be based on the Minnesota nitrogen BMPs. There will be increased restrictions/requirements when going from Mitigation Level 3 to Level 4. It is intended that Level 3 will allow farmers significant freedom to control their agronomic practices. However, Level 3 regulations are intended to send a clear message that groundwater contamination is a significant concern in the area; it is critical to actively work with crop advisors/consultants and the Advisory Team to help develop and implement reasonable and effective methods for addressing elevated nitrate. The goal of Level 3 regulation is to attain the widespread adoption of the BMPs and, to the extent possible, involve stakeholders in identifying solutions that will be effective in addressing the problem. In some cases other options may be needed such as those outlined in the AMT section in Chapter 8.

The process for developing rules in the Groundwater Protection Act (Minnesota Statutes, section 103H.275, subdivision 2) provides for two options, one is applying a rule statewide and the second is developing a rule which would be applied to specific geographic areas by Commissioner's Order. The MDA has decided to use both options. General information on what these proposed rules will contain is outlined below. Greater detail will be provided in the proposed rules.

PROPOSED STATEWIDE RULES

Part 1 of the proposed rule will restrict the fall application of nitrogen fertilizer and application of nitrogen fertilizer to frozen soils in areas that are vulnerable to groundwater contamination when it is listed under "not recommended" in the nitrogen BMPs. The MDA believes that these practices are clearly inappropriate, and that the vast majority of Minnesota farmers and their crop advisors do not fall apply or apply fertilizer to frozen ground when it is not recommended by the U of M.

If there are exceptions where fall application or application to frozen ground is appropriate, the MDA will include those exceptions in the rule. Exceptions could include things such as agronomic products or practices where nitrogen fertilizer use may be acceptable. The MDA will work with the U of M and the agricultural community to define or refine nitrogen BMPs and exceptions.

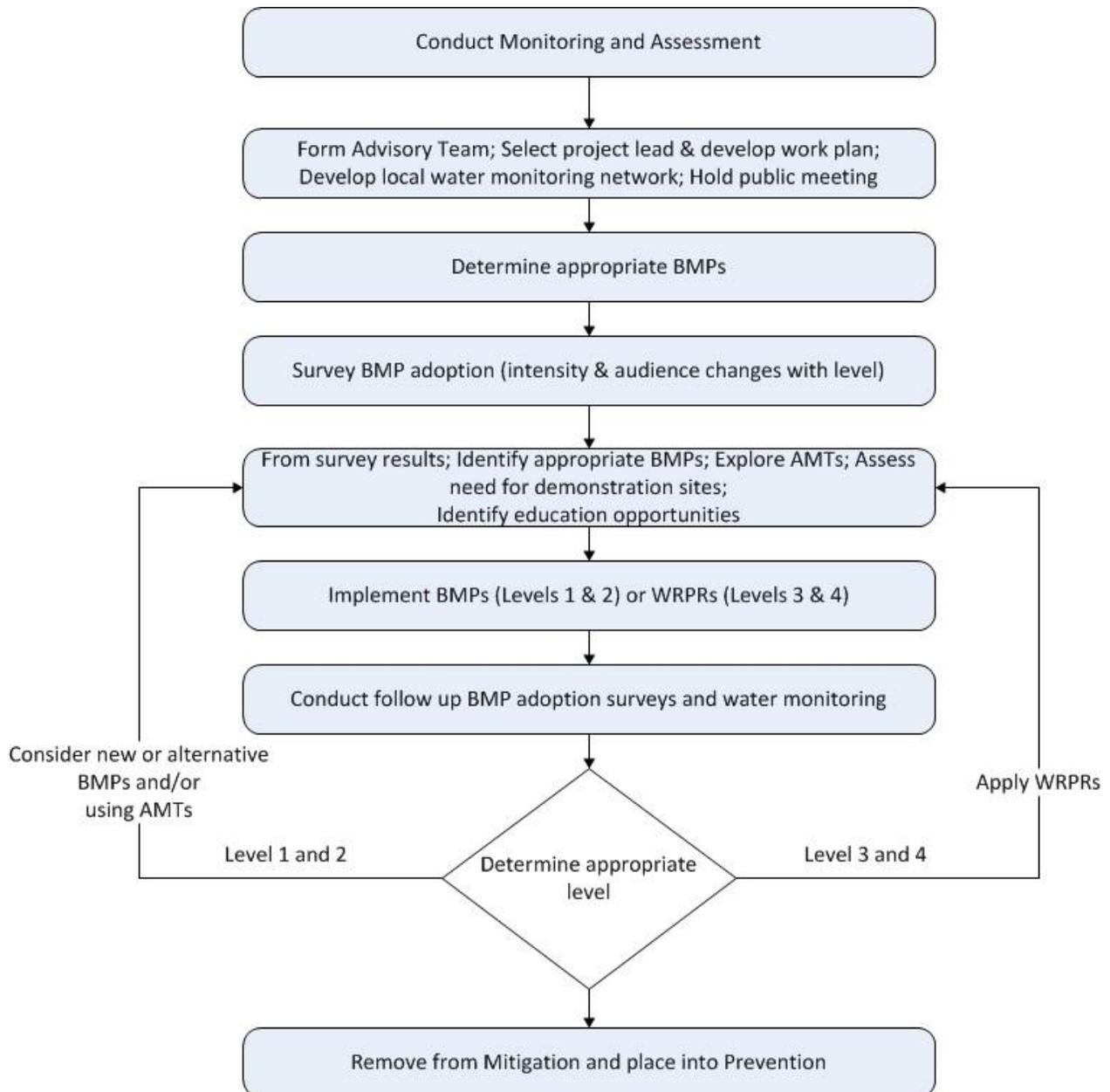
Part 2 of the proposed rule will adopt a process for moving to regulation based on the mitigation process outlined in this chapter. This includes implementing regulations at Levels 3 and 4. Site specific regulations would be selected from a menu of options that will be in the rule, with specific requirements applied to a local area (such as a township or wellhead protection area) through a Commissioner's Order as outlined in the Minnesota Statutes, section 103H.275, subdivision 2. Commissioner's Orders are exempt from rulemaking under the Administrative Procedures Act.

The menu of options would be based primarily on the existing regional nitrogen BMPs. Other options could include those listed in the 'Additional Mitigation Activities to Consider' section of this chapter. This menu of options will be reviewed at the local level in consultation with a local advisory team to select the option(s) appropriate for the specific setting.

MITIGATION DIAGRAM

Figure 26 depicts the mitigation process. It is a cyclical process, consisting of reoccurring nitrate monitoring and assessment, planning, pre- implementation BMP adoption surveys, a period of implementation, post-implementation BMP adoption surveys, and final assessment. This process begins after nitrate testing has occurred and impacted areas have been identified at the township or WHPA scale.

Figure 26. Simplified Nitrogen Fertilizer Management Plan (NFMP) Mitigation process.



BENCHMARKS

The MDA will develop benchmarks and performance goals for implementing the NFMP. This will be used for MDA work planning and also as an information tool for other state agencies and local partners. These will include timelines for evaluating private wells in townships with vulnerable groundwater and conducting the first round of nitrate sampling. The long term goal will be to survey every available private well in vulnerable townships at least once every 10 years in synch with the MPCA 10 year watershed monitoring cycle. This will allow local government units to integrate actions to protect groundwater into their local water management plans as well as coordinate potential shared monitoring efforts.

The MDA will estimate the staff resources required to implement a response effort in all areas designated as a Level 2 or higher over a period of 10 years and will seek funding to do so. The MDA will annually measure its performance against this 10 year plan and project likely implementation timelines into the future. The MDA will also evaluate and report on the progress implementing the BMPs and other mitigation actions in areas designated as a Level 2 or higher.

SURFACE WATER IMPAIRMENTS AND THE NFMP MITIGATION PROCESS

The MDA involvement in surface water impairments via the NFMP in a Prevention mode was discussed in Chapter 8. The following section describes how the MDA could become involved in surface water impairments via the NFMP in a mitigation mode.

GROUNDWATER TO SURFACE WATER DISCHARGE TOTAL MAXIMUM DAILY LOADS (TMDLS)

The MDA may implement a mitigation response in TMDL areas if the groundwater nitrate concentrations meet the criteria outlined in the NFMP. Regulatory actions may be considered in accordance with the NFMP and guidance in the Groundwater Protection Act. There must be clear attribution in the TMDL of the impact of nitrogen fertilizer management practices on groundwater quality, and the subsequent impact on surface water quality. These decisions will be made on a site specific basis subject to available resources. However, these projects will be prioritized following the process outlined in the “Prioritizing Mitigation Efforts” section of this chapter.

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Abbreviations

AGENCIES AND ORGANIZATIONS

BWSR	Minnesota Board of Water and Soil Resources
DNR	Department of Natural Resources
EPA	Environmental Protection Agency
MDA	Minnesota Department of Agriculture
MDH	Minnesota Department of Health
MDNR	Minnesota Department of Natural Resources
MGS	Minnesota Geological Survey
MPCA	Minnesota Pollution Control Agency
SWCD	Soil and Water Conservation District
U of M	University of Minnesota
USGS	United States Geological Service

TECHNICAL TERMS

BMP	Best Management Practices (voluntary)
ET	Evapotranspiration
HRL	Health Risk Limit
MCL	Maximum Contaminant Level
mg/L	Milligrams Per Liter
N	Nitrogen
NFMP	Nitrogen Fertilizer Management Plan
PMR	Pesticide Monitoring Region
UAN	Urea Ammonium Nitrate (fertilizer)
WRPR	Water Resource Protection Requirements (regulatory)

Appendices

- A. MDA Lessons Learned in Responding to Elevated Nitrate in Groundwater
- B. Case Studies: City of Perham, City of St. Peter, Lincoln-Pipestone Rural Water
- C. History of Groundwater Monitoring in Minnesota
- D. Challenges of Monitoring Groundwater Quality
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- J. Regulated Mitigation Guidance

A. MDA LESSONS LEARNED IN RESPONDING TO ELEVATED NITRATE IN GROUNDWATER

The Minnesota Department of Agriculture (MDA) has been working on responding to areas with elevated nitrate in groundwater for over 20 years. Most activities have been focused on responding to public water supply issues. However, our staff resources have always been severely limited, generally only a few staff to address the issue statewide. Therefore we focused our efforts on developing a process for responding to locally high nitrate, primarily through working with the Minnesota Department of Health (MDH) in wellhead protection areas with nitrate problems. Based on this experience, we have developed a general approach to addressing nitrate problems and have also learned a number of lessons regarding these efforts. This approach and some of the lessons learned are briefly discussed below:

Major Steps

1. Review monitoring data to confirm there is a problem and to understand the extent and scope of the problem.
2. Consult with other agencies on their understanding of the problem, especially the use of hydrogeologic sensitivity and groundwater flow maps to understand potential source areas for targeted implementation of practices.
3. Form a local advisory team.
4. Begin a long term private well monitoring network. This is not always possible within a wellhead protection area because most residents will be on public water. The same may be true for rural water systems.
5. Hold a public information meeting early in the process specifically for farmers; otherwise the subsequent survey of practices may not be successful.
6. Conduct a detailed survey of agricultural practices (FArm Nutrient Management Assessment of Practices - FANMAP) and other local issues such as lawn care, golf courses, etc.
7. Review the FANMAP data and identify recommended Best Management Practices (BMPs) for local soils and cropping systems.
8. Develop an educational response targeting key weaknesses (if any).
9. Work with farmers to implement recommended BMPs.
10. Use FANMAP data to support obtaining implementation and cost sharing funding if needed.
11. Foster industry and local agricultural dealership support and awareness.
12. Conduct edge of field demonstrations, such as the Red Top and Highway 90 demonstration sites. These sites were essential to opening doors to farmers and demonstrating BMPs that needed to be implemented.
13. Promote the Nutrient Management Initiative (NMI), BMP Challenge and other programs that address the economic risk for the farmers.
14. Consider alternative management practices such as alfalfa or Conservation Reserve Program (CRP) on high risk lands as early as possible in the process.
15. Continue monitoring and BMP promotion.
16. Conduct a post BMP adoption FANMAP survey (after appropriate time period) and adjust the response as needed.

Lessons Learned

1. Local government units may be very hesitant to work with state agencies and other outside potential players.
2. Most local government units may need a lot of help. They don't have the expertise to do this effort without considerable assistance.
3. Funding – we need to be realistic about funding needs and have many options based on funding availability.
4. Recognize that groundwater quality may be one of many issues facing any given area. Don't expect that locals will be there with open arms to take on new work, especially if there is not associated funding.
5. Be careful of local politics or long-standing sour relationships. There may be hard feelings to overcome that have nothing to do with the current situation.
6. There may be friction between the local government unit and area residents already. Sometimes to avoid confrontation, the local government unit may not want specific residents on the advisory team.
7. Intentionally build trusting relationships. Understand that it will take a long time to build these relationships. This is no different than how all of us act. Very few of us will put our business and future prosperity into the hands of a stranger.
8. The key people needed on the local advisory team are: the city and/or county; the water supplier; state agency technical staff, hydrogeologists and agricultural scientists; University of Minnesota Extension (if available); the local agricultural dealership(s) and, local farmers and their crop advisors.
9. Include as many farmers and local agricultural consultants/crop advisors on the advisory team as possible.
10. Keep people with difficult personalities off the team. One hostile person can ruin everything.
11. An objective non-accusatory attitude within the advisory team is the most important factor in the success of the project. This can be accomplished through strong, preferably local, leadership.
12. Don't waste farmers' time. They are busy. Make sure your meetings are well run and useful.
13. Find an effective facilitator if at all possible.
14. The project needs a liaison - a person who is trustworthy, reliable, and understands farming. Only this person should be allowed to speak to farmers outside of the advisory team meetings. Frequent visits, especially from unqualified people, may quickly wear out the welcome for everyone else. Sometimes it may be best to have the one contact person conduct shuttle diplomacy to negotiate between individuals or local government units to overcome hard feelings. Be flexible.
15. There can be a huge communications gap between the local advisory team and area farmers - this gap needs to be addressed early in the project.
16. Because groundwater issues are local, they tend to be relevant and important to people. Make sure everyone can understand the causes and effects of local nitrate problems.
17. Local needs - Be ready to address local concerns even when the best literature and science tells you otherwise, such as the golf course example. It was important to the area farmers that MDA investigate sources of nitrate from an area golf course. The demonstration helped address their concerns.
18. Many cities will not have their monitoring data compiled by individual well or may be reluctant to share the data with you. If possible obtain it. Long term water quality trend data is very useful. Rarely is there an abundance of monitoring data, and it is not uncommon for existing data required by MDH to be in paper form and unorganized.
19. MDA has developed a standard approach to conducting a field-by-field survey of actual nutrient management practices (FANMAP). While this tool is available to everyone, most people will have great difficulty conducting the survey without help. Individuals without a suitable agricultural background will not be able to conduct the survey.

20. The FANMAP survey of practices is extremely important. It provides hard facts on local farm practices, both good and bad. These facts change the whole tone of the discussion from one of defensiveness to one of shared problem solving. Without facts all you have are opinions and assumptions, which are usually incorrect. Present FANMAP results back to the farmers and ask them "did we get it right?" This will add enormous credibility to the program by collectively identifying weaknesses and possible reasons for current practices.
21. Information on the practices for a specific farm or piece of land must be kept completely confidential or no one will participate. Farmers are very proud and competitive and watch their neighbors, so be careful not to embarrass anyone. Further, sharing information on rental land and individual farm practices can put farmers at a local competitive disadvantage and cost them money.
22. FANMAP data generally makes it much easier to obtain implementation funding since you can be very specific in a grant or loan application about what needs to be implemented and why, and the request will be supported by the members of the advisory team.
23. Local farmers have repeatedly come up with the ideas that work best.
24. Consider Alternative Management Tools (AMTs) early (Chapter 8). These generally are by far the most beneficial actions that can be taken to address groundwater quality issues. They might be very costly to implement, but we have seen farmers implement these practices at their own cost in order to help their neighbors and their community.
25. Don't expect passive, indirect methods of communication to change practices. Mail outs, news releases, etc. may be very good at raising awareness but rarely result in behavioral changes.
26. Crop advisors/crop consultants are especially influential in many farmers land management and fertilizer use decisions.
27. Make it a priority to provide farmers with updates and question/answer opportunities. Some of our best meetings have been over a meal sponsored by the community and served more as a trust building exercise rather than an informational meeting.
28. Give farmers credit for being reasonable, caring, people who want to be good neighbors. With very few exceptions they are.
29. Edge of field demonstrations, such as the Red Top and Highway 90 demonstration sites and the Nutrient Management Initiative are essential to opening doors to farmers and demonstrating BMPs that need to be implemented in a location.
30. Land swapping and rentals can add numerous complications to water quality efforts. Rental lands can be a challenge since the owner may not be local and may have little interest in the local situation. Alternatively, a land owner has the ability to require BMPs or implement alternative management strategies on their property.
31. Methods for evaluating progress on a project may include indicators such as 1) edge of field demonstration response time; 2) early adoption by cutting edge farmers; 3) adoption by "average" farmers; 4) changes in deep residue soil nitrate from bottom of root zone to the water table; 5) observation wells or sand points, etc.
32. Water quality monitoring data will determine success or failure of the effort. We will know if our efforts are being successful. However there may be a long lag time between implementing practices and improvements in water quality. Rarely will improvements in groundwater quality be observed in public water supplies within a year; it may take many years, even decades to see improvements.
33. Vigilance. Once you start working on a local nitrate problem you can never stop. Unless someone is paying attention, the land use practices may revert back to the old ways.

B. CASE STUDIES: CITY OF PERHAM, CITY OF ST. PETER, LINCOLN-PIPESTONE RURAL WATER

CITY OF PERHAM

Perham is located in the heart of Minnesota's west-central lakes region in Ottertail County. The city boasts an impressive business community based upon industry, agriculture, and tourism. Approximately 325 million gallons of water are supplied each year to businesses, industry, and its 2600 residents. Elevated nitrate levels in the community's drinking water supplies have forced the city to take immediate and long-term corrective actions. Providing quality drinking water is an important component for future growth and viability of this region.

Water Quality and Challenges

- Five supply wells vary in depth from 95 to 120 feet deep. Two supply wells were recently idled due to low output and will only be used under emergency or backup situations. A new well, yielding high quality water, was put online in 2000 to replace them.
- Individual city wells have sporadically exceeded the safe drinking water standard of 10 mg/L. Currently city staff blends water to keep the levels of the finished drinking water between 6 to 8 mg/L nitrate. Deeper aquifers with lower nitrate levels contain high levels of iron. More than likely, finding adequate supplies of low nitrate water will become more and more difficult.
- A nitrate removal system was considered, but not put into practice because of the very high costs involved.
- Water quality is impacted by factors such as land use activities from a combination of growing high nitrogen consuming crops, large areas being irrigated, coarse-textured soils which allow rapid water movement, and relatively shallow wells.
- Perham's wellhead protection area covers approximately 11,500 acres. Within this area, 1,600 acres are of significant importance, because surface water can reach the aquifer within 10 years.
- In the remaining protection area it typically takes between 10 to 30 years for water to reach the aquifer. This means that we may not enjoy many of the environmental benefits of improved nitrogen management for years to come.

Successful Action Steps

- A wellhead protection plan was completed to address the amount of nitrogen escaping from cropland, lawns, septic tanks, and feedlots. Management goals and strategies in the plan define implementation steps to protect and improve drinking water quality. This approach was highly successful due to cooperation among community residents, farmers, businesses, industry, and state/local agencies.
- Residents in the wellhead protection area, including farmers, businesses and city homeowners, are being provided with information on specific actions they can take to protect drinking water. Information is being distributed through public meetings, press releases, utility bill inserts, demonstration projects and curriculum being taught in local schools.

- Signs have been installed identifying the boundaries of the wellhead protection area. Residents, landowners, and farmers have a better understanding of the size of the protection area when they can visually see it.
- In 1993, the Perham wellhead protection team partnered with the MDA to establish a volunteer groundwater monitoring network using about 100 privately owned wells. Nitrate trends are monitored in outlying areas and within the water supply management area.
- In 1999 and 2000, most farmers who farm in the wellhead protection area participated in a study to evaluate their current nutrient management practices, fertilizer, manure rates, and review associated management. This information helped educators design appropriate programs and served as the baseline to determine where improvements have been achieved.
- Farmers are trying a new variety of potato that produces good crop yields with less nitrogen fertilizer.
- Livestock farmers are improving the way they manage manure by developing nutrient management plans and taking nitrogen credits for those applications.
- Landowners have been encouraged to take sensitive land out of crop production where nitrate leaching is a risk. This land is enrolled in long-term easements through the Conservation Reserve Program (CRP). Native grasses planted on this land are helping to filter out pollutants moving into groundwater.
- Homeowners are learning efficient ways to manage nitrogen fertilizer applications on their lawns. Regular maintenance of septic systems is encouraged and failing systems are upgraded.

CITY OF ST. PETER

St. Peter is located in south-central Minnesota nestled in the beautiful Minnesota River valley. Substantial growth and development are projected for the future of St. Peter and supplying quality drinking water is very important for long-term economic growth and stability of the city. Approximately 350 million gallons of drinking water are supplied annually to over 10,000 residents.

Water Quality and Unique Challenges

- Seven supply wells, varying in depth from 130 to 670 feet, pump water from three separate aquifers. Of these, four shallow wells are considered vulnerable to land use activities.
- Nitrate levels in the vulnerable wells have been steadily increasing since the 1980's. In response to this threat, a planned approach was developed on how to minimize risks from nitrate and other contaminants.
- City staff blend water from various wells to produce a finished water supply which typically contains nitrate levels between 4 to 5 mg/L, the health standard is 10 mg/L. In 2011 the City of St. Peter did construct a reverse osmosis treatment system to treat for nitrates, radium and other minerals.
- St. Peter's wellhead protection area covers over 4,600 acres. Over 80% of the protection area is cultivated cropland consisting of corn, soybeans, and canning crops.

- Drainage water derived from tile-drained cropland on the western edge of the management area is discharged onto coarse-textured soils near the city limits. The rapid infiltration of water through these coarse soils allows rapid movement of contaminants into the aquifer.

Successful Action Steps

- Community residents, farmers, businesses, and state/local agencies developed a wellhead protection plan to protect the city's water supply. Management goals and strategies in the plan define implementation steps to address nitrate contamination from cropland, lawns, and septic systems. This plan was approved in 1998 and was one of the first of its type in Minnesota.
- Local units of government were instrumental in obtaining funding through state and federal grant programs. Assessing the extent of the problem and implementing numerous educational activities were made possible through these grants.
- City residents, farmers, and businesses are provided with information on specific actions they can take to protect drinking water. Information is distributed through public meetings, media, direct mailings, utility bill inserts, demonstration projects, and curriculum being taught in local schools.
- An inventory of potential contaminants was compiled by interviewing property owners. Personal interviews provided an excellent "one on one" opportunity to explain the importance of protecting their drinking water resource.
- A well sealing campaign was initiated for inactive private wells. This campaign successfully sealed numerous wells and identified some previously unrecorded ones.
- In 1996, an "on-farm" study was conducted to evaluate farmer's current nutrient management practices, fertilizer/manure rates, and review associated management decisions. This information helped target educational programs focused on reducing nitrogen application rates and promote nitrogen Best Management Practices (BMPs).
- Rural residents are encouraged to upgrade failing septic systems through low interest loan, cost share programs, and upgrades through property transfer requirements.
- Homeowners are learning about efficient ways to manage nitrogen fertilizer applications on their lawns. Lawn and garden care demonstrations are held at local parks. Lawn management information is supplied to the homeowner through monthly water statements.
- The "Red Top" demonstration farm was established in 1995 as a means for evaluating the University of Minnesota fertilizer recommendations, associated nitrogen BMPs, and subsequent water quality. This site has been a highly successful demonstration tool.
- Informational handbooks were developed and distributed to farmers and agricultural professionals within the wellhead protection area. These handbooks emphasize activities producers and landowners can implement to reduce groundwater contamination.
- Numerous nitrogen validation trials have been established on farmer's fields. Results from these trials have consistently proven that farmers can produce maximum economic corn yields and reduce nitrogen inputs. Farmers in the protection area are beginning to implemented positive management changes on their own farms after seeing these results.

- Crop consultants and agricultural retailers are taking a leadership role in promoting nitrogen BMPs and developing nutrient management plans. Some farmers in the area are taking advantage of cost share incentives for developing these plans through the Environmental Quality Incentive Program (EQIP).

LINCOLN-PIPESTONE RURAL WATER

Water quality and quantity in southwest Minnesota are significant concerns. Protection of limited water supplies is important to the long-term economic stability and growth of this area. Most drinking water supplies in the region are obtained from shallow groundwater aquifers which are frequently contaminated with nitrate. Deeper aquifers are not suitable for use as drinking water because of sulfur contamination and inadequate recharge. Past agricultural land use practices have played a large role in defining today's water quality issues.

Water Quality and Unique Challenges

- Lincoln-Pipestone Rural Water (LPRW) supplies water to 27 communities and 3000 rural households in southwestern Minnesota.
- The recharge area of the three major well fields— Burr, Verdi, and Holland covers over 32,000 acres. Water from the Burr well fields is low in nitrate due to the geology of this area.
- Raw water from some of the Verdi and Holland supply wells have elevated nitrate levels and in some cases exceeded the federal drinking water quality standard of 10 mg/L. These higher levels are due to the fact that wells are shallow and vulnerable to contamination from activities taking place on the land.
- Wells containing various nitrate concentrations are blended to produce a safe finished product.
- A \$2,000,000 nitrate removal system was installed in the Holland well field. (Hopefully over time improved water quality will make the system unnecessary).
- Few locations in the area have a dependable backup source of drinking water. It is critical that existing supplies are adequately protected.

Successful Action Steps

- The LPRW project is an example of how water suppliers, crop and livestock farmers, ag-dealerships, University of Minnesota, and local/state/federal organizations can work together to develop and implement a wellhead protection plan. Management goals and strategies in the plan define implementation steps to protect and improve drinking water quality.
- A chain reaction of grant writing and obtaining sources of funding occurred after the initial state grant was obtained. Local units of government were responsible for later bringing in \$235,000 in EQIP 319 and Clean Water funding, and a \$60,000 continuation gift from the Lincoln-Pipestone Rural Water Board, to support local initiatives.
- When nitrogen BMPs are properly administered, and adequately funded with cost share dollars, significant behavioral changes in nutrient management can be achieved in a narrow window of time.

- Channeling communications from all of the various partnerships through the LPRW project coordinator significantly reduced much of the confusion, redundancy, and apprehension commonly shared by most farmers in these types of projects.
- Local Natural Resource Conservation Service and Soil and Water Conservation District staff are historically swamped with existing workloads. Hiring a dedicated nutrient plan writer/coordinator to work solely with farmers to develop nutrient, pesticide and tillage management plans was a huge boost to the project.
- Research was conducted to fine-tune existing fertilizer and manure recommendations for the unique soils and geology found in this area. Area farmers were highly receptive to having research conducted by USDA-ARS and University of Minnesota (U of M) on their farms. This research confirms that U of M recommendations for applying nitrogen are accurate.
- Farmers were extremely receptive to changing management practices when provided knowledge as to: 1) how their nutrient management decisions affect groundwater quality, and 2) how changes in their nutrient management decisions can result in favorable profit margins.
- Similar to most areas of Minnesota, farmers frequently enjoy a cost savings of anywhere from \$4 to \$8 per acre through reduced nitrogen inputs. Savings on manured fields can be substantially higher.
- Personal on-farm visits and “one on one” technical assistance were critical in clearly explaining the benefits of conservation easement programs and nitrogen BMPs.
- Portions of the most sensitive land have been taken out of agricultural production and have been placed into the Conservation Reserve Program (CRP) where groups such as local hunting clubs can lease the land.
- Innovative, cost effective solutions are frequently developed on a very localized scale. In this case, a lease agreement between an area hunting club and LPRW was highly beneficial in taking some of the most sensitive land out of production and replacing it with perennial grasses and legumes.

C. HISTORY OF GROUNDWATER MONITORING IN MINNESOTA

The Groundwater Protection Act of 1989 provided funding for the Department of Natural Resources, Minnesota Geological Survey, Minnesota Pollution Control Agency, Minnesota Department of Agriculture and Minnesota Department of Health to conduct various types of groundwater monitoring. Because of the Act, Minnesota has made great strides in advancing its groundwater data collection programs. This accomplishment is due in part to a study completed in 1991 by the Legislative Water Commission, titled “Nitrogen in Minnesota Groundwater.” This report clearly identified the void in not having a statewide groundwater monitoring program to specifically assess the extent and trends of nitrate concentrations.

Since the 1990s, Minnesota has evolved to use a multi-agency approach to monitoring groundwater quality and quantity. Multiple state, local, and federal entities collect groundwater samples for nitrate analysis throughout Minnesota. Each entity has differing statutory and regulatory authority, purposes, goals and roles in groundwater monitoring based on their respective responsibilities (Figure C 1). Some of these entities are listed below, along with their related web link (is not an exclusive list):

- Minnesota Department of Agriculture (MDA) – Monitors water quality to identify the concentration and frequency of agricultural chemicals in Minnesota’s groundwater and surface water.

<http://www.mda.state.mn.us/chemicals/pesticides/maace.aspx>

- Minnesota Department of Health (MDH) – Monitors public drinking water supplies in the state. The web link provides monitoring and statistical information on nitrate nitrogen levels found in community water supply systems in relation to the number of community systems in Minnesota and population served.

<https://apps.health.state.mn.us/mndata/nitrate-messaging>

- Minnesota Department of Natural Resources (DNR) – Monitors groundwater levels via a statewide network of water level observation wells.

http://www.dnr.state.mn.us/waters/groundwater_section/obwell/index.html

- Minnesota Pollution Control Agency (MPCA) – Monitors ambient groundwater quality conditions in urban areas around the state.

<http://www.pca.state.mn.us/index.php/water/water-types-and-programs/groundwater/groundwater-monitoring-and-assessment/groundwater-monitoring-and-assessment.html>

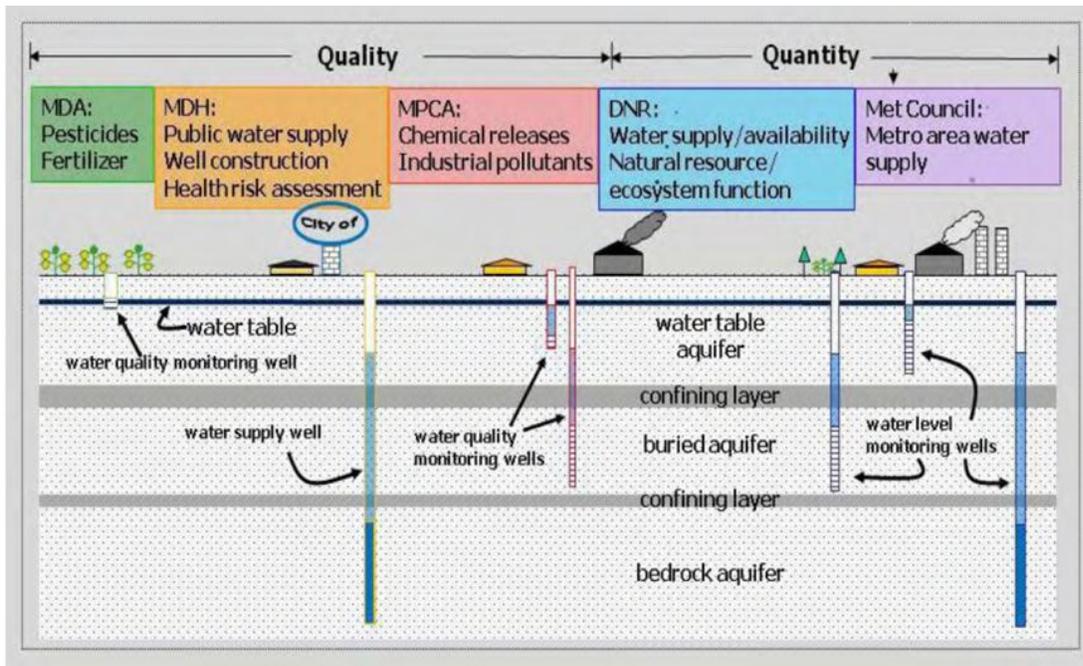
- United States Geological Survey (USGS) – Monitors groundwater quality and quantity in special project areas or at regional-scales throughout the nation.

<http://water.usgs.gov/ogw/programs.html>

- County agencies, such as Soil and Water Conservation Districts (SWCDs) – Manage natural resources at the local-scale.

http://www.maswcd.org/SWCDs_On_The_Web/swcds_on_the_web.htm

Figure C 1. Minnesota agencies responsible for water monitoring and the well types used



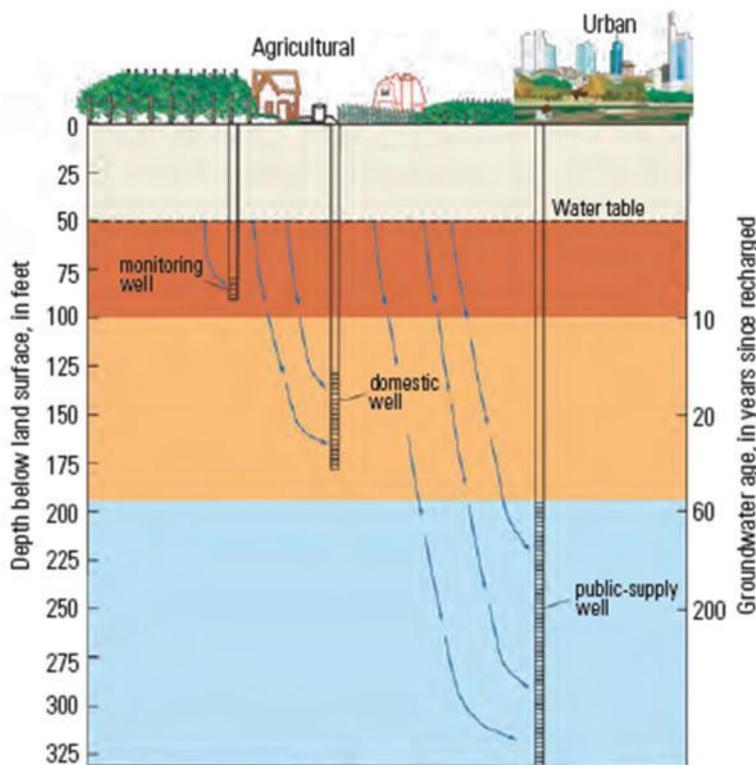
D. CHALLENGES OF MONITORING GROUNDWATER QUALITY

There are many complicating factors to monitoring and assessing groundwater nitrate data. Nitrate concentrations in the groundwater will depend upon the amount of the nitrogen loading into the system, transport time to groundwater, and where and when the sample is collected (Minnesota Department of Health 1998). Specifically, the nitrate concentration will depend upon, 1) nitrogen input as a result of land use (e.g., grassland, forest, dry land cultivation, irrigated crop land, residential, industrial or commercial) and how that land use is managed; 2) short-term and long-term precipitation, or recharge; 3) physical and chemical properties (Chapter 3), and 4) associated management of nitrogen fertilizer inputs.

In addition to land use, climatic and other variables influence the nitrogen cycle and the release of nitrate into the water table. Well type, construction and placement can have huge implications on nitrate monitoring results. Nitrate is typically highly stratified, with much higher concentrations at the top of the aquifer, so it is important to monitor water quality in various depths.

Typically, each type of well—monitoring, private (domestic), or public—taps a different depth interval in the aquifer system, so that samples collected from each type of well reflect a different part of the history of nitrogen input in that region (Figure D 1).

Figure D 1. Well types, associated depths and rate of groundwater recharge (Dubrovsky 2010)



Because the well type, construction and depth can affect groundwater quality results, it is important to be aware of how the wells differ.

Monitoring wells are installed for the sole purpose of monitoring groundwater quality and do not provide drinking water. The intake, or screen, of a monitoring well is located to evaluate a specific type of contaminant. Groundwater samples collected from monitoring wells are very sensitive to groundwater quality changes caused by infiltrating recharge. This makes monitoring wells ideal for evaluating impacts to groundwater quality caused by the overlying land use (Minnesota Pollution Control Agency 2007). Because of these factors, monitoring well nitrate results are typically much higher than private and public wells and should not be used to infer drinking water quality.

Private (domestic) wells are installed to supply drinking water to homes and small businesses. The intake or screen for a private well is generally installed ten or more feet below the water table and typically ten or more feet in length to maximize the volume of water that can be extracted from the aquifer. Because the intake of a private well is separated by distance and time of travel from the water table, groundwater samples collected from private wells tend to be insulated from rapid water quality changes occurring at the water table. Consequently, private wells can provide a more integrated picture of ambient water quality in the aquifer (Minnesota Pollution Control Agency 2007).

Public supply wells are installed to supply drinking water to the public, the most prominent being a municipal system, operated by a city to provide water to its citizens. However, schools, churches, mobile home parks and apartment complexes may also have public water supply wells. Public water supply wells are installed at varying depths depending on geology and water quantity needs. Typically public supply wells are deeper than private wells.

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E. EVALUATING THE PRESENCE OF NITRATE-NITROGEN IN GROUNDWATER

Water resource managers must have high quality data for making sound decisions to protect groundwater from nitrate-nitrogen (hereafter referred to as nitrate) impacts. Collecting high quality nitrate data requires an appropriately designed water monitoring program. Methods for evaluating nitrate in groundwater must consider the time it takes for water to travel from a point of origin (for example, a septic system or a farm field) to an aquifer and subsequently within the aquifer. The transformation of nitrate (via chemical reactions) within the aquifer needs to be understood in order to determine proper well placement, data collection needs and to ensure appropriate evaluation of the resulting data. Monitoring groundwater for nitrate is multi-faceted, time consuming and expensive to do correctly, but proper monitoring design is absolutely necessary in order to ensure accurate and informative data are collected.

One of the key issues in developing a nitrate monitoring program and understanding the data is denitrification. Denitrification results in the transformation of nitrate into harmless nitrogen gas ($\text{NO}_3^- \rightarrow \text{NO}_2^- \rightarrow \text{NO} + \text{N}_2\text{O} \rightarrow \text{N}_2$ (gas)). Denitrification is an important process in groundwater and occurs when oxygen is either absent or is present at very low levels in the aquifer. These low oxygen conditions are known as reducing conditions and can effectively remove the nitrate from groundwater. Knowledge on where these reducing conditions are present in groundwater is critical in developing monitoring strategies and for interpreting the data from monitoring samples.

Another critical piece of information needed to develop a nitrate groundwater monitoring program is the age of the water in the aquifer. Water enters the ground to become groundwater at various times prior to when a sample is collected (days, weeks, years or decades). The time lapse between when the water entered the ground and when the sampling occurs may be critically important in determining the significance of nitrate results. Typically, water that entered the ground 50 or more years ago tends to have very low nitrate levels. It is also very common for this water to occur at greater depths in the aquifer. Groundwater age and reducing conditions, combined, lead to the explanation why deeper groundwater within the same aquifer has little or no nitrate present even when there are high nitrate levels near the top of the aquifer.

What makes an aquifer more susceptible to nitrate impacts?

In Minnesota, surficial aquifers are recharged annually. This means the time it takes water to move from a point of origin to the water table (the very top portion of the aquifer) is less than one year. These surficial aquifers are generally considered susceptible to nitrate contamination at the water table; however, deeper portions of these surficial aquifers may not be susceptible because nitrate will be denitrified or the water is older, having entered the ground before the increase in nitrogen fertilizer application during the past 50 years. Another reason that deeper portions of a surficial aquifer may be less susceptible to nitrate is the presence of a thick confining layer, which creates a physical barrier so nitrate cannot move from the top to deeper portions of the aquifer.

How does an aquifer in a reducing condition decrease nitrate levels?

The nitrogen cycle in groundwater is complex and dependent on many variables. Nitrogen generally moves into an aquifer as nitrate. Once within an aquifer, nitrogen will stay as nitrate as long as there is an adequate supply of oxygen. Conversely, when oxygen is depleted bacteria within the aquifer will begin to use, or consume, nitrate as an energy source. These “denitrifying” bacteria will use up available nitrate by converting it to nitrogen gas and thus create areas of low nitrate.

What is the best way to monitor for nitrate?

When monitoring groundwater for nitrate, samples should be collected in all dimensions within the aquifer of concern; both horizontally and vertically. The upper portion of an aquifer may be susceptible to nitrate contamination but the lower portion may not be. A transition zone of low oxygen content, where nitrate is used by bacteria and converted to gas, frequently occurs between upper and lower aquifer zones. The transition zone may be susceptible to nitrate reaching the zone but the nitrate rapidly disappears, ultimately resulting in low sensitivity to nitrate.

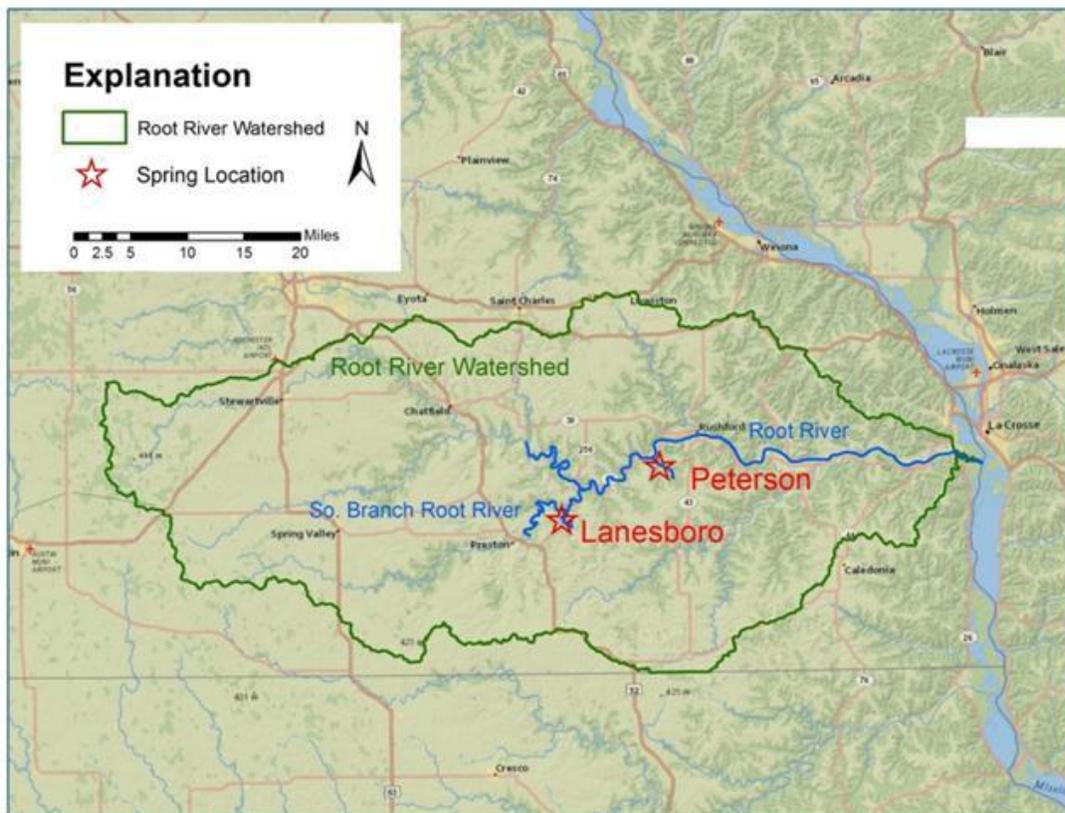
Samples collected from wells in a nitrate monitoring program should be analyzed for other parameters to more completely understand the fate of nitrogen in the aquifer. Samples may be tested for different forms of nitrogen, including nitrogen gas and ammonia, as well as dissolved oxygen and other common groundwater constituents (such as, dissolved iron, sulfur, and manganese). There are many other groundwater quality concerns related to nitrate that will need their own specific monitoring design, ranging from relatively basic to extremely complex. In the end, the cost and complexity of a nitrate monitoring program is directly related to how the resulting data will be used. The main costs associated with an appropriately designed nitrate monitoring program are drilling multiple wells at varying depths, sample collection and analysis, and subsequent data analysis and summarization.

F. NITRATE TRENDS IN GROUNDWATER AT SELECTED SPRINGS IN SOUTHEAST MINNESOTA

Minnesota Pollution Control Agency (MPCA) Root River Watershed Study 2000-2010

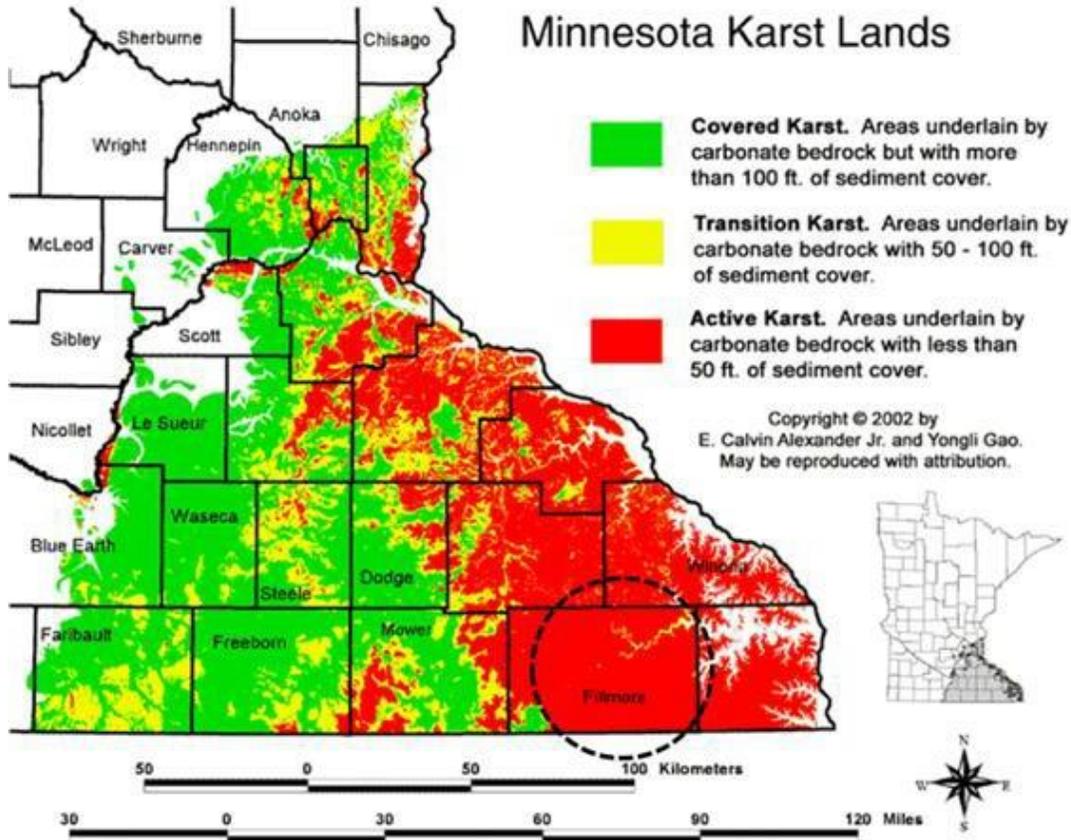
Due to its unique karst geology (fractured limestone bedrock overlaid with shallow soil, often with sinkholes), much of southeastern Minnesota represents a sensitive region for contamination of groundwater and surface waters. As part of an effort to understand the groundwater-surface water interaction on the karst landscape, the MPCA investigated flow and nitrate concentration trends in three springs in the Root River Watershed in southeastern Minnesota from 2000-2010 (Figure Figure F 1) (Streitz 2012).

Figure F 1. Root River Watershed Study Area



The Root Watershed is located in an active karst region of Minnesota (Figure F 2). Karst landforms are concentrated in southeastern Minnesota and consist primarily of limestone. The springs included in the study were Lanesboro, Peterson and Crystal springs. Crystal Springs, located on the Whitewater River in northern Winona County was dropped due to a lack of data. Lanesboro and Peterson springs are both integrated into the Minnesota Department of Natural Resources fish hatchery operations. Because of this connection, discharge and nitrate concentrations have been monitored for over 20 years.

Figure F 2. Study Area and Hydrogeology of Southeast Minnesota



Spring discharge is controlled by the interaction between precipitation, topography, geology and climate. To understand these interactions, precipitation, water appropriations (withdrawals), and stream flow data was analyzed. Below are some basic conclusions:

- Based on average areal precipitation, rainfall in the Southeast region displays no significant trend over the last 20 years.
- Groundwater and surface water withdrawal trends have been increasing at statistically significant rates over the last 20+ years, with $p = 0.01$ for both trends.
- The average annual flow of the Lanesboro spring shows no trend over the period of the last 20 years.
- The Lanesboro spring average annual nitrate concentration shows a statistically significant increasing trend (Figure F 3).
- The Lanesboro spring shows a rising trend in nitrate load that is statistically significant, at $p < 0.05$ (Figure F 4).
- The flow data for the main spring at Peterson spring shows no statistically significant trend, but it appears that flow was in a long term decline until 2007, when flow increased dramatically.

- The Peterson spring average annual nitrate concentration shows a statistically significant increasing trend (Figure F 5).
- The Peterson spring exhibits a strong rising trend in nitrate load that is statistically significant, at $p=0.001$ (Figure F 6).

Figure F 3. Lanesboro Spring nitrate-nitrogen average annual concentration (MPCA 2012)

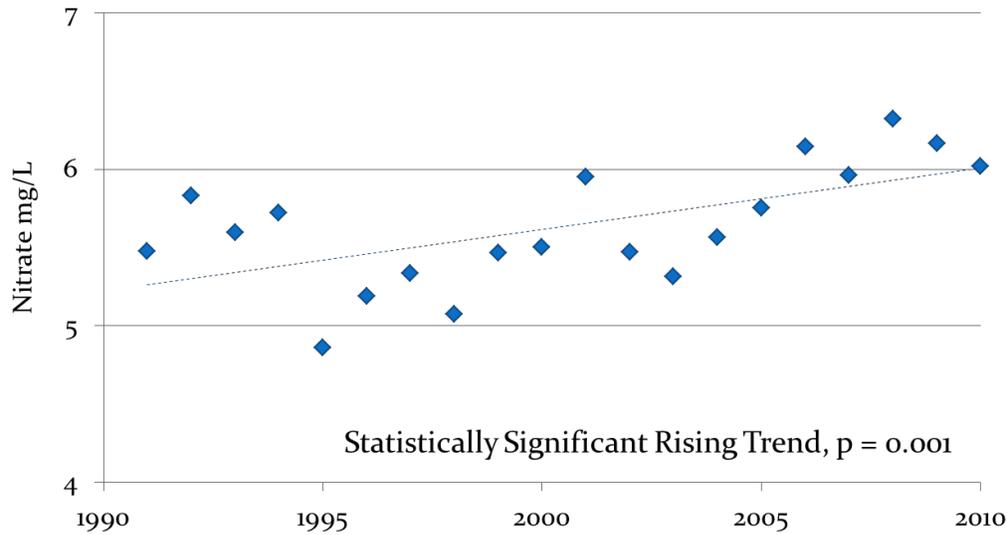


Figure F 4. Lanesboro Spring nitrate-nitrogen load (MPCA 2012)

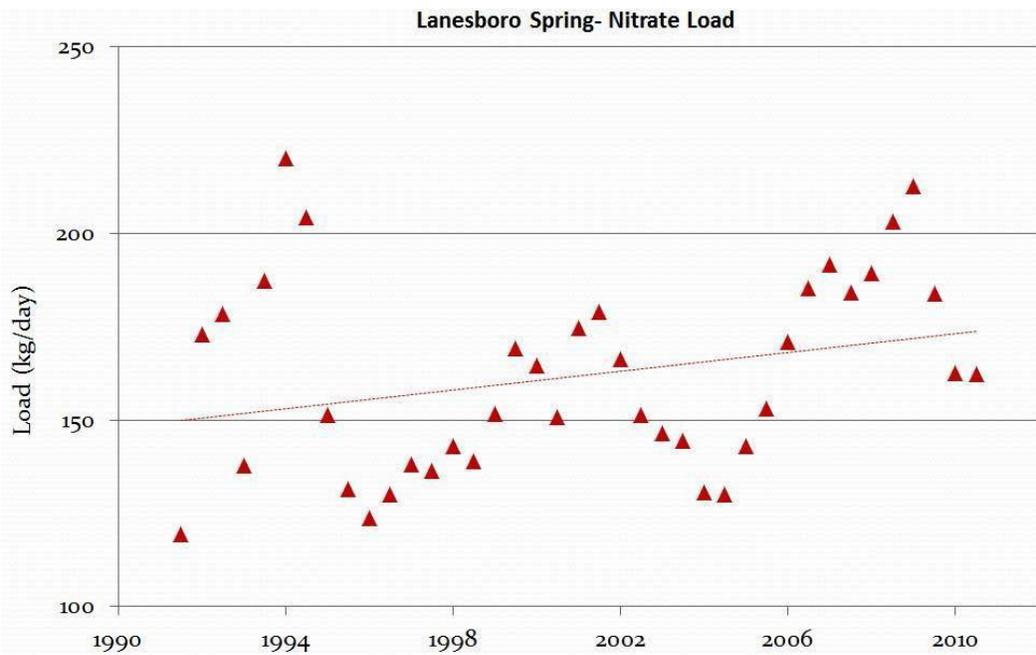


Figure F 5. Peterson Spring nitrate-nitrogen average annual concentration (MPCA 2012)

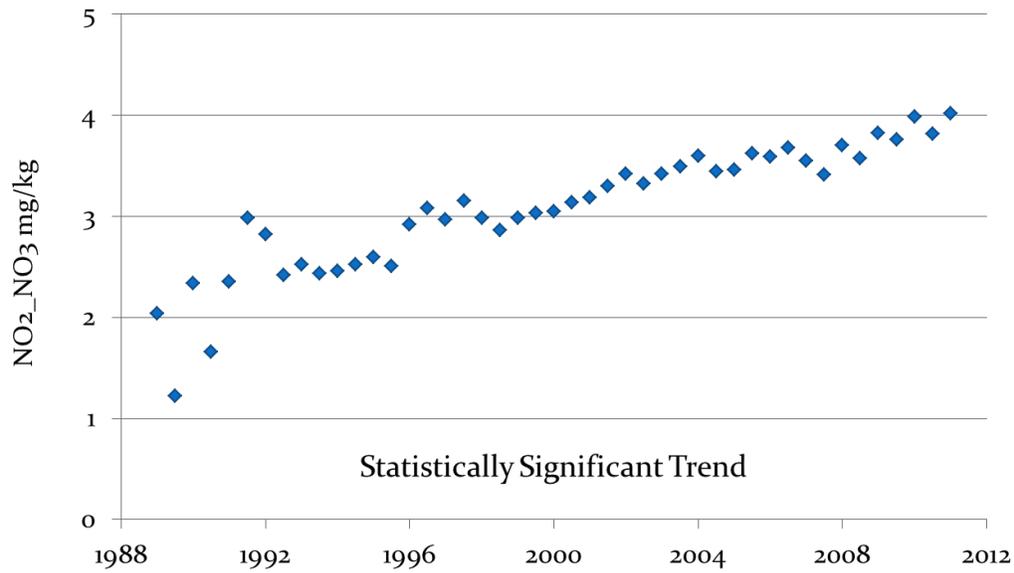
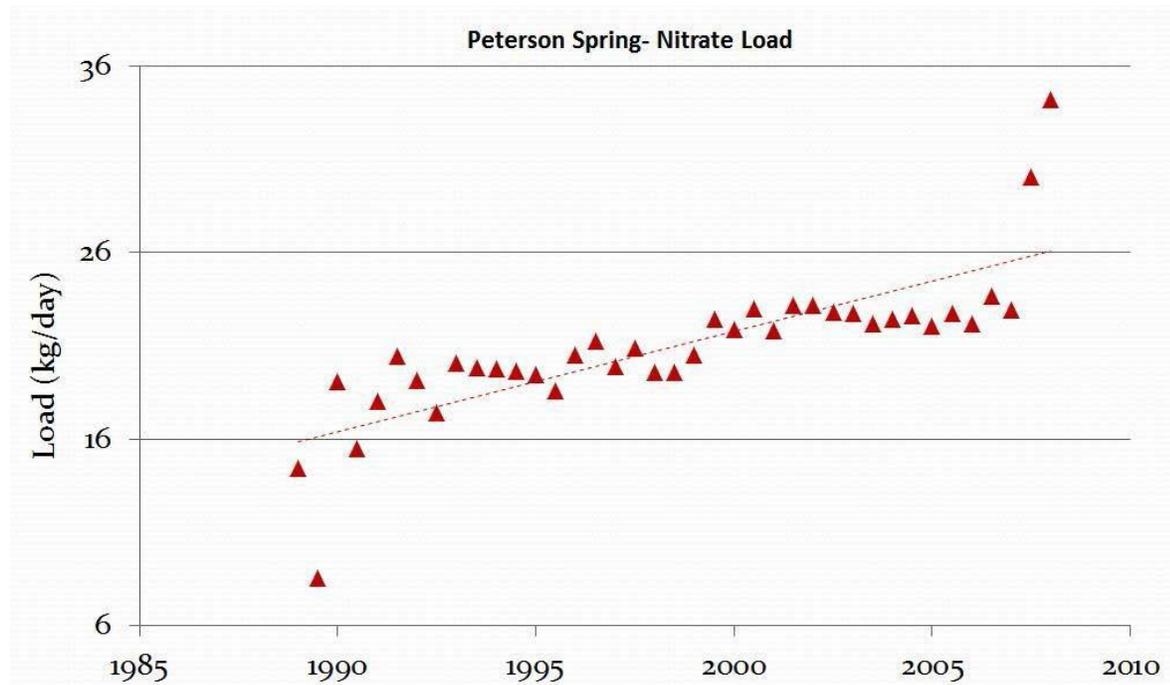


Figure F 6. Peterson Spring nitrate-nitrogen load (MPCA 2012)



References

Streitz, Andrew. 2012. Nitrate Trends in Groundwater at Selected Springs in Southeast Minnesota. Minnesota Pollution Control Agency. August 1, 2012.

G. THE NITROGEN CYCLE, SOURCES AND TRENDS

The behavior of nitrogen in the environment is governed by a complex set of interrelated chemical and biological transformations. These reactions are summarized in the “nitrogen cycle” (Figure 12). The nitrogen cycle describes the inputs, pools, pathways, transformations, and losses of nitrogen in the environment.

The nitrogen cycle reactions are influenced by the interaction of numerous chemical, biological, environmental and management factors. The dynamic interplay of these factors complicates predictions of the behavior of nitrogen introduced into the environment. Knowledge of the dynamics of the nitrogen cycle is important to help understand how these multiple factors will interact to influence nitrogen behavior at a given site. Sound nitrogen management decisions can then be made based upon this knowledge.

Although several nitrogen species are involved in the cycle, the species which are of primary importance in the soil are nitrate-nitrogen (NO_3^-), ammonium nitrogen (NH_4^+), and organic nitrogen. The characteristics of these species and related processes are summarized below:

- **Organic nitrogen:** Organic nitrogen is the predominant nitrogen species in the soil profile. Organic nitrogen is not readily available for release into solution but must first be transformed to inorganic forms by microbial action (mineralization). Organic nitrogen may be the primary source of nitrogen in surface runoff but rarely contributes to groundwater contamination.
- **Nitrate (NO_3^-):** Nitrate is extremely soluble in water and its negative charge excludes it from adsorption onto sites in the soil colloid exchange complex. These characteristics render it highly susceptible to leaching and subsequent groundwater contamination.
- **Nitrite (NO_2^-):** Nitrite is an intermediate product in the conversion of ammonium to nitrate in the soil and is the species of toxicological concern in the human system. Although nitrite is highly soluble, it is also very unstable and is rarely detected in groundwater except at very low levels.
- **Ammonia (NH_3) / ammonium (NH_4^+):** Ammonia (gas) is the primary form of nitrogen feedstock applied in fertilizers. It reacts to form ammonium immediately upon contact with water. Ammonium binds tightly to soil colloid surfaces and clay interlayers; it will be temporally immobile until soil bacteria convert it to the much more soluble nitrate form.

The primary chemical and biological processes of the nitrogen cycle include:

- **Mineralization:** The microbial degradation of organic nitrogen to produce the inorganic forms of nitrogen.
- **Net Mineralization:** The cumulative balance at the end of the growing season between mineralization and immobilization. Net mineralization is used frequently within this document when discussing nitrogen budgets and comparing quantitative amounts to other nitrogen sources.
- **Nitrification:** The microbial mediated oxidation of ammonium to nitrite and then to nitrate. This is the primary nitrate-producing reaction in the cycle. It is also a key to potential nitrogen loss in the cycle since nitrate can be lost from the root zone by leaching or by denitrification.
- **Immobilization:** The assimilation of inorganic forms of nitrogen by plants and microbes, producing various organic nitrogen species.

- **Denitrification:** The biochemical reduction of nitrate and nitrite to gaseous molecular nitrogen (N₂) or a nitrogen oxide form nitrous oxide (N₂O), nitric oxide (NO), or nitrogen dioxide (NO₂). This is a primary volatile loss pathway to the atmosphere. Over 78% of the atmosphere is comprised of N₂.
- **Volatilization:** The loss of ammonia to the atmosphere. This occurs primarily in the case of surface-applied urea fertilizers, animal wastes (which also contain urea), and during the application of anhydrous ammonia under conditions when the soils do not properly seal.
- **Leaching:** The process of mass and diffusive transport of solutes in water percolating through the soil. Nitrate is the principal nitrogen species transported in subsurface water due to its solubility and exclusion from adsorption onto soil colloid surfaces. Nitrate leaching is one of the primary avenues of nitrogen loss, particularly during years with above-normal precipitation.

AGRONOMIC AND EXTERNAL SOURCES OF NITROGEN

The potential sources of nitrogen to the soil system are many and varied. In an agronomic context, all nitrogen sources applied to a field should be taken into account in determining the appropriate nitrogen fertilizer rate. This multitude of potential sources greatly complicates the calculation of a nitrogen budget. For the purposes of this discussion, nitrogen sources will be defined in terms of agronomic (crop growth) inputs and external sources. The agronomic inputs are those sources which may be considered in a nitrogen budget for the purposes of crop production. The external sources are nitrogen sources which may contribute to groundwater contamination but are dissociated from agricultural production.

Agronomic Inputs:

- Soil organic matter and crop residue;
- Commercial fertilizers;
- Atmospheric deposition;
- Atmospheric fixation (legumes);
- Land-applied manure and other organic residues.

External Sources:

- Municipal Wastes;
- Septic systems;
- Feed lots (concentrated animal wastes);
- Turf grass (golf course, parks, private and public lawns);
- Landfills;
- Wildlife excretions.

Two notes should be made on the subject of nitrogen sources. First, all nitrogen sources perform the same function in the context of the nitrogen cycle, although they may enter the cycle at different points. This means that all nitrogen sources are potential nitrate sources and could contribute to groundwater contamination. Secondly, it is important to recognize that nitrate occurs naturally in the soil system.

Theoretically, this means that the threat of nitrate contaminated groundwater is ubiquitous regardless of external inputs. However, in Minnesota there are no known cases of elevated nitrate levels in groundwater in an undisturbed situation. Background nitrate concentrations are generally considered to be below 3 mg/L.

The University of Minnesota (U of M) and other land grant universities have conducted numerous research projects and subsequently produced numerous reports on nitrogen management and its relationship to environmental outcomes (Randall and Mulla 2001; Randall and Goss 2001; Laing 2008). These research efforts have primarily focused on cropland soils and its associated agronomic inputs.

At the time of this report writing, a highly related research project between the U of M, U.S. Geological Survey, and the Minnesota Pollution Control Agency (MPCA) reached its final completion (Minnesota Pollution Control Agency 2013). Researchers did an exhaustive investigation of nitrogen sources and contributions to surface and groundwater.

Project goals were:

- Assess soil nitrogen budgets for combinations of soils, climates, and land uses representative of the most common conditions in Minnesota;
- Assess nitrogen contributions to Minnesota rivers from primary land use sources and hydrology pathways; and
- Determine the watersheds which contribute the most nitrogen to the Mississippi River.

Figure 13 (Chapter 5) illustrates the major sources of nitrogen inputs to Minnesota cropland. It is noted that farmers don't have direct control over some of the major pathways. Mineralization contributions account for greater than 40% of the inputs but due to the complexities of the nitrogen cycle, this source is the least understood. Similarly atmospheric deposition, although significantly less important, also needs to be considered. Mineralization rates are strongly influenced by many factors including soil type, organic matter content, climatic conditions and landscape position. In a very general sense, average mineralization and deposition credits are already built into the U of M's nitrogen fertilizer recommendations. Due to mineralization variability, nitrogen fertilizer rate recommendations tend to be a range based on regional research rather than an absolute number.

Alternatively, farmers have considerable management control over the fertilizer source characteristics, timing, placement and rate of commercial fertilizer. Complicating factors include the successful management of manure and legume sources. However, a sound science-based nutrient management approach can successfully account for many of the complicating factors under most cropping conditions.

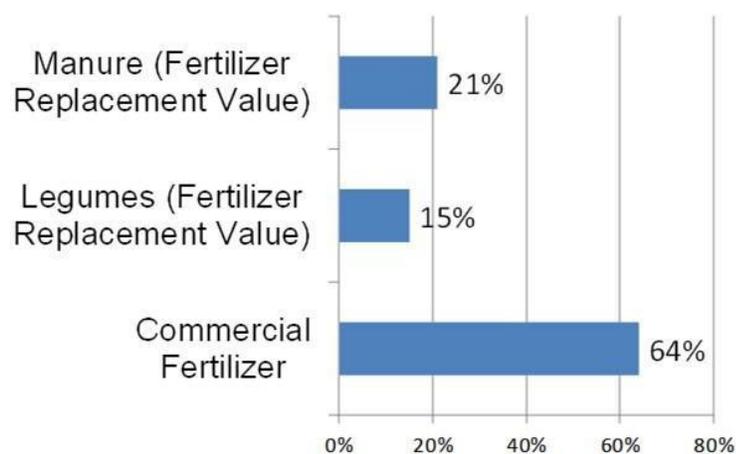
MAJOR AGRICULTURAL SOURCES OF NITROGEN

Figure G 1 examines the same data set as Figure 13 but only looks at those sources that farmers have direct control over. Estimates of the relative contributions from the primary agricultural nitrogen sources including fertilizer, manures, and legumes are 64%, 21% and 15%, respectively. For comparative

purposes, contributions from manure and legumes¹ are expressed in terms of “fertilizer replacement” values. Previous estimates (Minnesota Pollution Control Agency 2008) were 68%, 14%² and 18%, respectively, based on data from the 2002 Census of Agriculture. The importance of manure was slightly different in the two studies due to some minor differences in nutrient availability assumptions. Animal densities were similar, but the more recent study by the MPCA (2013) considered a much wider set of variables.

It is also important to note that the relative contributions of these three key nitrogen sources vary drastically from farm to farm and in many cases, from field to field.

Figure G 1. Controllable nitrogen sources applied to agricultural land (Modified from Wall et al. 2012)



NITROGEN FERTILIZER SALES AND SOURCES

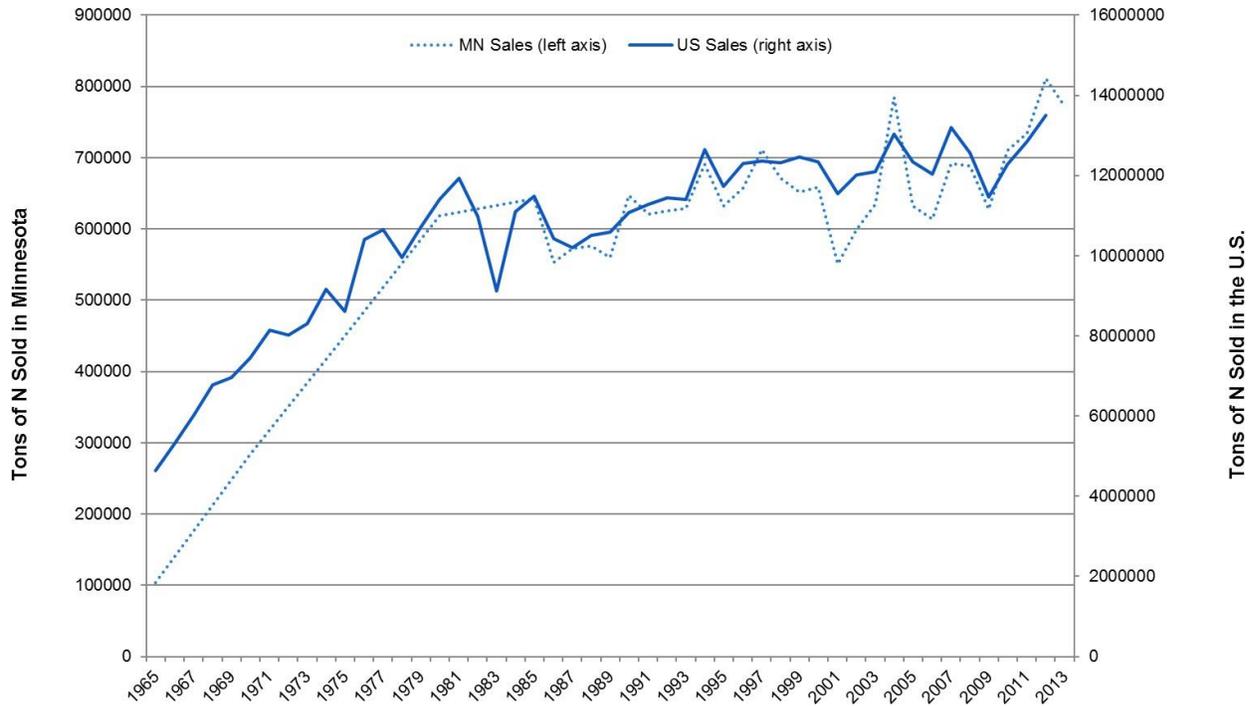
The industrial process for creating ammonia was first developed in the early part of the 20th century. However, it was not until World War II ended that synthetic ammonia was readily available for agricultural use. Adoption of commercial fertilizer proceeded slowly until the early 1960’s. The Tennessee Valley Authority (TVA) and cooperative research programs in many U.S. agricultural colleges helped promote the adoption of fertilizer use. Commercial nitrogen fertilizer use eventually catapulted in the United States during the 1960’s and 1970’s as a result of educational efforts, lower costs, and the introduction of improved plant genetics.

¹ In the 2013 MPCA report, the amount of nitrogen which cropland legumes fixed from the atmosphere was estimated to be 612 million pounds (306,000 tons per year). When converting to “fertilizer replacement” value, it was assumed that the past soybean acres contributed 140,000 tons per year (7 million acres at 40 pounds per acre) and the alfalfa-clover acres would be terminated after the fourth year of production contributing 19,000 tons per year (2 million acres at 75 pounds per acre) for a legume “fertilizer replacement” value of 159,000 tons per year.

² Manure nitrogen contributions were calculated based upon the 2002 animal census for various species of livestock and poultry using nutrient output estimates from the Midwest Planner (Midwest Plan Service 1985). Output numbers are then reduced by 50% recognizing that there are significant storage and application losses due to gas emission losses of ammonia, uncollected manure under pastured conditions and other losses. These adjusted values represent the land-applied portion of manure that ultimately becomes available for plant uptake and is referred to as the “fertilizer replacement value of manure.”

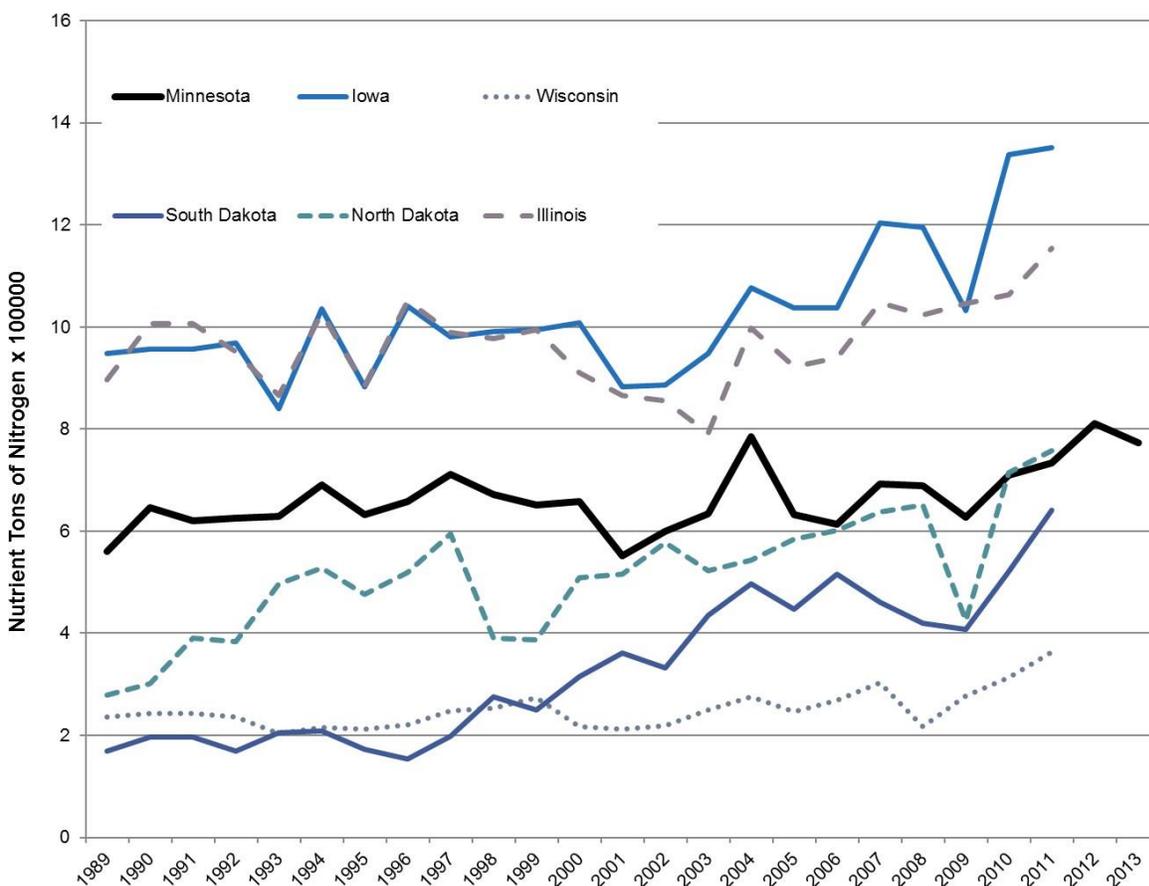
Minnesota’s historic nitrogen use (Figure G 2) tracks similar to the national trends.

Figure G 2. Commercial nitrogen fertilizer sales trends in Minnesota and U.S., 1965-2013



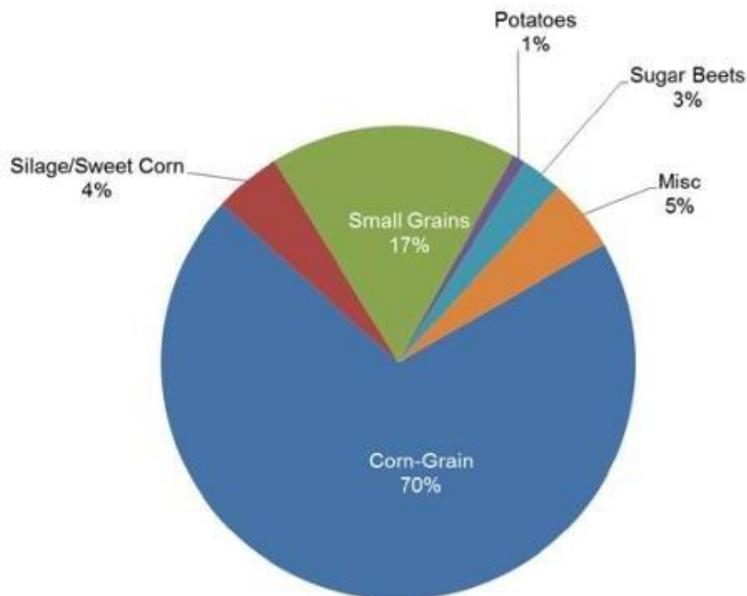
Minnesota's nitrogen fertilizer sales began to stabilize in the early 1980's. Over the past 20 years, statewide sales have averaged 660,000 tons per year and are trending slightly upward (Figure G 3). Fertilizer sales in other Upper Midwestern Corn Belt states have also shown slight upward trends. Both North and South Dakota have seen some rapid increases in nitrogen fertilizer sales which are most likely due to large increases in corn acres.

Figure G 3. Nitrogen fertilizer sales trends in neighboring states, 1989-2011



In order to better understand the potential fate of nitrogen fertilizer, it is important to establish a basic understanding of the usage and associated management. Obtaining accurate fertilizer use information directly from farmers can be problematic and therefore frequently limited. Consequently the statewide nitrogen fertilizer information reported here are approximations (Figure G 4). The key pieces of information needed to make these estimates are derived from the Minnesota Department of Agriculture’s (MDA) annual statewide sales and the reported crop acres from the National Agricultural Statistics Service (NASS).

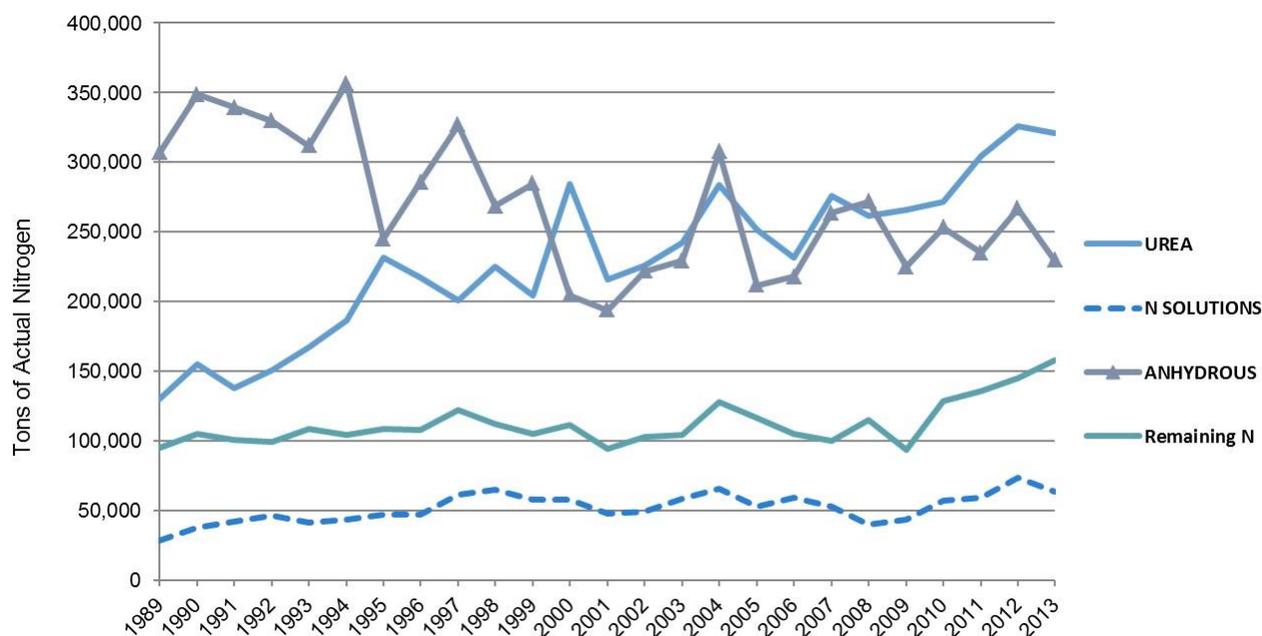
Figure G 4. Estimated nitrogen fertilizer distribution by crop type (MDA sales data and NASS reported acres from 1992-2011)



It is estimated that grain corn consumes approximately 70% of the nitrogen fertilizer sold in the state. With the recent increases in corn acres (2010 to 2013), those percentages have recently grown to 76 to 77%. Small grain consumption (defined here to include spring and winter wheat, oats, durum, barley, and rye) accounts for another 15 to 20%; this acreage can vary significantly from year to year. Silage corn and sweet corn (fresh market and canning) uses another 4 to 5%. Minnesota is a national leader in sugar beet production (0.5 million acres) which consumes another 3%. Statewide, the amount of nitrogen fertilizer used on irrigated and dry land potatoes is a very small percent although the per acre rate on irrigated potatoes is generally the highest compared to any other crop. Miscellaneous crops (5%) include edible beans, sunflowers, peas and some other minor crops.

Selecting the right nitrogen source is an important consideration. Minnesota's nitrogen best management practices (BMPs) recognized the importance in selecting the right source in partnership with timing, placement, rate and other factors. Anhydrous ammonia (82-0-0) was the dominant source throughout the 1970's, 80's and early 90's (Figure G 5). Historically, anhydrous has been the cheapest source. It also has been an excellent option for many farmers in a fall-application program because anhydrous is less prone to off-season leaching losses compared to other sources. However, because of safety concerns and increased regulations, the number of fertilizer dealerships offering anhydrous has steadily decreased during the 1990's.

Figure G 5. Trends in major nitrogen sources used in Minnesota, 1989-2013



In many cases, urea (46-0-0) has taken up the slack in anhydrous ammonia sales. For most applications in Minnesota, urea can be an excellent substitute when properly applied for most farmers. However, it does not have the versatility of anhydrous for fall application in the south-central part of the state. For the last decade, anhydrous and urea each supply approximately 35 to 40% of the state's nitrogen fertilizer. Liquid nitrogen fertilizer (28-0-0 and 32-0-0) account for another 9 to 10% of the sales. Miscellaneous sources, which include a very wide variety of dry fertilizer products, make up the balance.

These major nitrogen fertilizer sources have unique characteristics and require different management in terms of timing, placement, and methods for stabilizing. Minnesota's regionally-based nitrogen BMPs provide farmers with this type of information. For more information, please review the complete set of nitrogen BMPs by going to the [University of Minnesota Extension Nutrient Management website: http://www.extension.umn.edu/agriculture/nutrient-management/nitrogen-best-management-practices/](http://www.extension.umn.edu/agriculture/nutrient-management/nitrogen-best-management-practices/).

CROPPING TRENDS AND POTENTIAL NITROGEN LOSSES OF MINNESOTA'S MAJOR CROPS

Crops vary widely in their physiological nitrogen needs, timing of uptake, and their ability to capture nitrogen inputs before it becomes a water quality concern. Crop type is one of the most profound drivers influencing water quality and it is extremely important to understand these relationships. Numerous research studies by the U of M and other land grant universities have clearly documented the importance of crop selection on the potential impacts on nitrate leaching losses. A collection of outstanding summaries have been compiled as a result of the relatively recent concerns associated with the hypoxic zone in the Gulf of Mexico (Laing 2008).

Some general guidelines found in Table G 1 provide a listing of the major crops grown in Minnesota, the typical nitrogen requirements, unique characteristics of that crop, and the relative nitrate leaching losses.

Table G 1. Typical nitrogen requirements and potential impacts on nitrate leaching losses for crops/cover in Minnesota (MDA and MDH)

Commonly grown Agricultural Crops or Alternative Cover	Typical Nitrogen Requirements (Pounds per Acre)	Characteristics	Relative Nitrogen Leaching Loss Rating System*
Corn (Grain or Silage)	70-180	Deep rooted; inputs highly dependent on anticipated yields	Spring Applied: M-H; Fall Applied: H-VH; Irrigated: M-H; Manured: M-VH
Wheat, Barley, Oats	60-100	Solid seeded	L-M
Soybeans	Legume – no additional nitrogen needed	Poor scavenger of residual soil nitrate	M
Potatoes – Irrigated	200-250	High management, shallow root system	H-VH
Sugar Beets	100-120	Sugar quality decreases if too much nitrogen available	M
Alfalfa	Legume – no additional nitrogen needed	Very deep rooted, excellent scavenger. Crediting to subsequent crops critical upon termination	L-Potential losses after crop is terminated
Grass-Legume Mixtures	60; lower nitrogen rates allow for legume growth	NA	VL-L
Pasture/Grazing	Plant nutrition provided by manure or supplemental fertilizer inputs	NA	Dependent upon grazing pressure; Generally L
CRP Mixtures	Application at establishment	Mixtures vary but diverse systems tend to be the most conservative	VL
Lawns and Golf Fairways	40-160	Fall nitrogen applications; split applications	L; L
Golf Greens, High Input Areas	120-220	Split applications needed	M-H

*Very High=VH, High=H, Medium=M, Low=L, Very Low=VL

Crop selection, as reported by the NASS over the past ninety years, has changed dramatically. Minnesota once routinely raised over 8 million acres of small grains each year (Figure 16). Acres dropped significantly in the 1950's and again during the 1980's and 1990's. Over the past decade, there are approximately 2 million acres grown. Small grains are generally considered to have a low to moderate impact on groundwater quality for the following reasons: solid seeding resulting in a uniform root distribution; typically grown in areas of low groundwater vulnerability; and moderate nitrogen inputs due to lodging concerns.

Corn acres have been steadily increasing for the last ninety years. This crop has high nitrogen requirements and has a narrow uptake period. Minnesota's nitrogen BMPs have a number of options to insure that this crop has the nutrients needed during this critical uptake period. Other nitrogen-demanding

crops are relatively small on a state perspective but can have significant impacts (both economic and environmental) on a local level.

Looking back at the trends in “legume” crops since the 1920’s (Figure 17), there has been a very steady decline of alfalfa and clover acres. These declines are linked to the significant changes in the dairy industry and due to lower production costs in neighboring states. These crops have strong, positive implications on groundwater quality and have been demonstrated to be extremely effective at removing nitrate from the soil profile resulting in high quality recharge into groundwater.

Despite being one of the oldest crops known to human civilization, soybeans did not become an important crop in the U.S. until the turn of the 20th century. Soybean production started in Minnesota in the early 1940’s and has steadily increased to about 7 million acres. Provided with the proper nitrogen-fixing bacteria (via inoculum), soybeans are highly capable of supplying its own nitrogen needs as well as utilizing residual soil nitrate from the previous crop.

Between the 1920’s and 1960’s, amounts of nitrate leaching below the root zone were probably relatively small compared to recent years. The major changes over the past ninety years are: 1) the additional influx of commercial fertilizers (Figure 15); 2) substantial more acres of nitrogen demanding crops (Figure 16); and 3) replacement of nitrogen conserving crops, such as alfalfa, clovers, pasture and hay grasses, with soybeans (Figure 17). These changes in aggregate contribute to an increased risk of nitrate entering groundwater. If these changes continue on the landscape, it suggests an ongoing increased risk nitrate loading to groundwater.

TRENDS IN N FERTILIZER USE ON MAJOR CROPS, PRODUCTION AND FERTILIZER USE EFFICIENCY

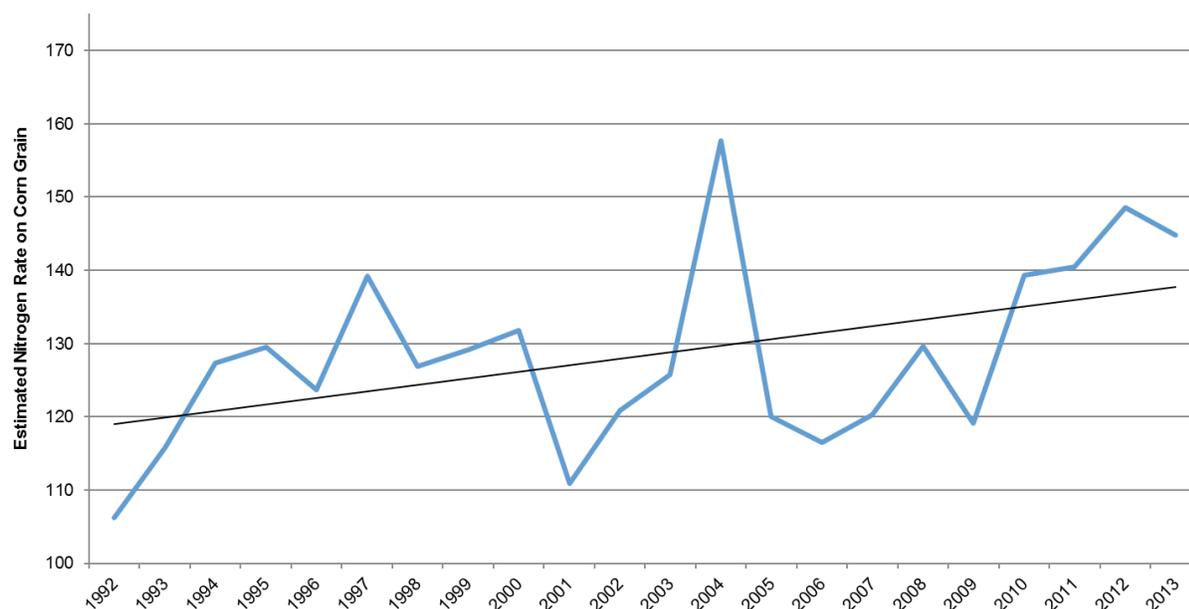
Generally, nitrogen fertilizer rate is the most important factor in understanding potential environmental consequences. Figure 18 illustrates the important relationship between nitrogen fertilizer rates, crop response, and nitrate leaching losses. Identifying the optimum nitrogen rate is critical in balancing the production aspects with environmental concerns associated with water quality.

Since the writing of the original Nitrogen Fertilizer Management Plan (1990), there has been significant advancements made in understanding nitrogen fertilizer use and the associated management practices that Minnesota farmers implement to optimize economic and environmental returns. Chapter 6 discusses these survey studies, and other methods for understanding current fertilizer practices.

Establishing credible data quantifying nitrogen rates that farmers typically use on their farming operation can be extremely complicated. Factors such as crop rotation, mineralization rates, and manure applications need to be understood for the reported rates to be meaningful. Additionally, it is not uncommon for farmers to use different rates for specific fields based upon years of past experience. Making things even more complex is the fact that a significant number of farmers are now applying multiple nitrogen rates within a given field through soil zoning or other variable rate techniques.

The MDA has been estimating nitrogen fertilizer use on grain corn since 1992. The MDA’s approach used the reported annual statewide sales data as the starting point. Sales included both primary and secondary nitrogen sources such as nitrogen contributions from MAP and DAP. Using the verified NASS reported acres for all crops, MDA staff then used the best available use information from other existing surveys and university input for all crops other than grain corn. The remaining balance was then divided across all reported corn acres. Rates over time are provided in Figure G 6.

Figure G 6. Statewide estimates of nitrogen fertilizer rates on grain corn, 1992-2013

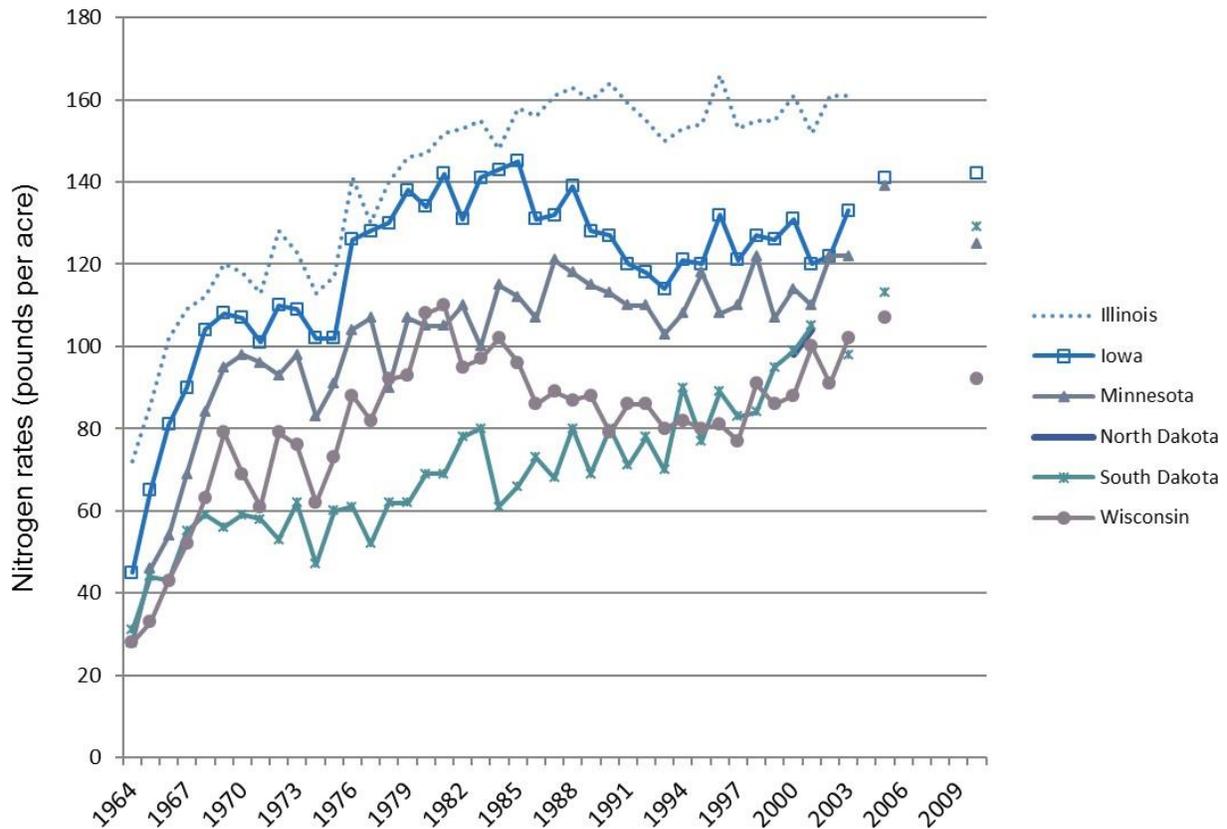


Due to the fact that the relationship shown in Figure G 6 is based upon sales data, there tends to be considerable year to year variability. Spikes such as shown in 2004, followed by subsequent slump, were probably caused by the short term occurrence of buying fertilizers on the futures market. The actual product more than likely did not get applied until one to three years after the recorded sale. Based upon the MDA estimates, it appears that across all corn acres, the typical nitrogen fertilizer rate on corn tends to be between 120 to 140 pounds per acre. Rates increased very slightly (4%) from 1992 to 2011. Average rates between the time periods of 1992 to 2001 and 2002 to 2011 were 124 and 129 pounds acre per year, respectively. Estimated nitrogen fertilizer rates since 2010 increased 5 to 10 pounds per acre and were likely to be directly linked to high corn prices.

The NASS has also made estimates of fertilizer rates over the past fifty years. The nitrogen fertilizer rate estimates for corn shown Figure G 7 are from the ARMS³ survey program. The NASS collected this information annually until 2003. Because of federal budget cuts, ARMS activities have become highly sporadic. It is very important to note that the sampling population used in ARMS is used primarily for economic analysis and is heavily weighted on factors such as farmer age, income and demographics. The resulting sampling population used by ARMS is approximately 150 individual corn fields which is intended to represent 7 to 8 million acres across the state. Additionally, the NASS does not collect any information on crop rotation, manure application, etc. It is believed that the NASS approach generally underestimated nitrogen rates and similar observations were reported in Iowa. Typically using the NASS rates and reported acres, it was very difficult to account for 10 to 20% of the nitrogen fertilizer sold statewide.

³ Agricultural Resource Management Survey. This survey is USDA's primary source of information of the financial condition, production practices, resource use, and economic well-being of America's farm households.

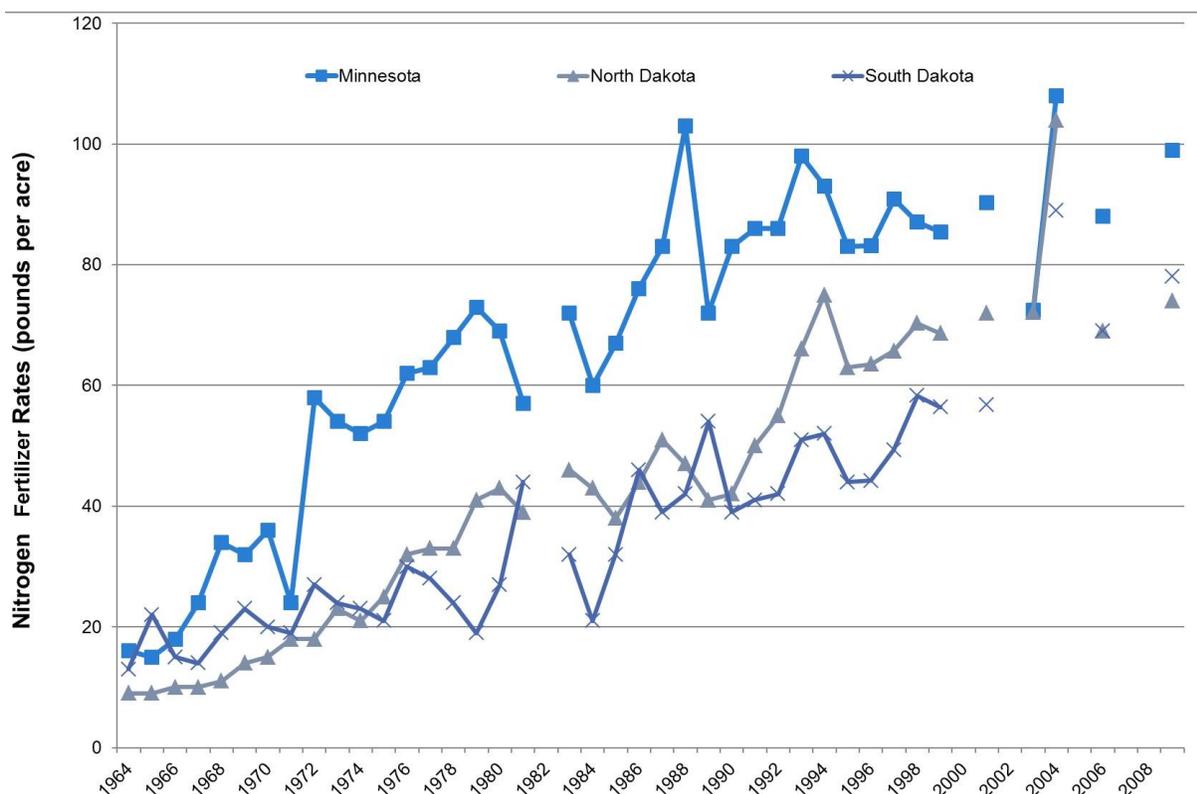
Figure G 7. Nitrogen rates on corn in neighboring states, 1964-2010. Note that the data set from North Dakota is very limited.



The NASS/USDA fertilizer use information, because of the already discussed limitations, is probably the most useful with general trends over time. When comparing trends on estimated nitrogen rates on corn, it appears that Minnesota rates follow somewhat similar patterns to neighboring states (Figure G 7). Similar to the rate estimates provided in Figure G 6, this data also suggests that rates on corn are trending slightly upward over the past twenty years.

The NASS/ERS included wheat in their annual surveys since the 1960's (**Error! Reference source not found.**). This information suggests that rates, similar to corn, rose rapidly and then stabilized over the past 10 to 15 years. Lodging from too much nitrogen can cause excess top growth, weakened stems, and subsequent harvesting problems from wind damage.

Figure G 8. Nitrogen rates on wheat in neighboring states, 1964-2010



Sugar beets are an excellent example of the need for balancing production with product quality. The sugar beet industry, with the assistance of North Dakota State University and the U of M, determined that there is a very significant negative relationship between nitrogen fertilizer rates and the amount of extractable sugar produced per acre. Extensive research has led to the conclusion that 110 to 130 ⁴ pounds of nitrogen per acre is adequate for production of high yielding sugar beets with good quality (BMPs for Nitrogen Use in Southwest and West Central MN). Information on commercial fertilizer rates on other Minnesota crops is very limited.

There are some other interesting trends that have developed over the last 20 years between inputs and outputs. Nitrogen fertilizer consumption on corn has increased about 13%⁵ corn acres have steadily increased by 8%⁶(Figure G 8). However, the interesting outcome is that the corresponding outcome (bushels produced) has increased about 40%⁷over the same time period.

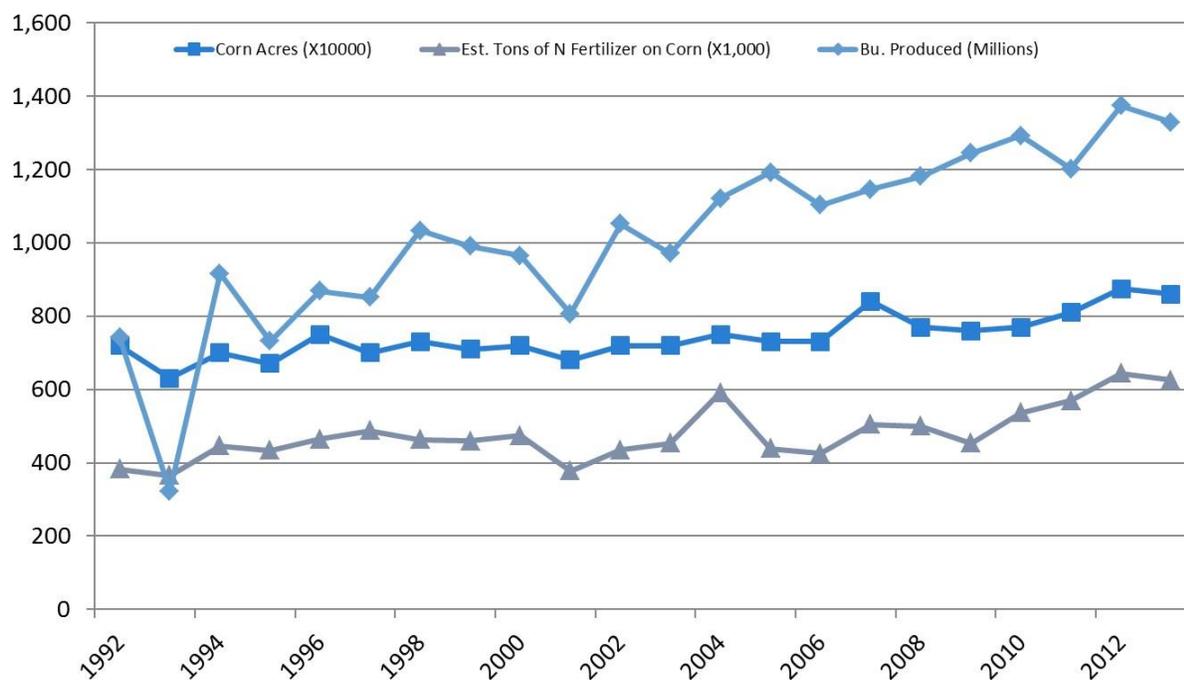
⁴ Total nitrogen is the sum of fertilizer nitrogen and soil residual nitrate measured to a depth of four feet in late fall.

⁵ Annual consumption by corn between 1992-2001 and 2002-2011 were 435,100 and 490,100 tons, respectively

⁶ Average corn (grain) acres between 1992-2001 and 2002-2011 were 7.0 and 7.6 million acres, respectively.

⁷ Average bushels of corn grain produced between 1992-2001 and 2002-2011 were 822,390 and 1,150,280 million, respectively.

Figure G 8. Relationship between grain corn production, corn acreage and nitrogen fertilizer inputs



This relationship suggests that corn farmers are successfully getting more production from each pound of nitrogen fertilizer. From the environmental perspective, this trend is positive. However at this time, the causative factors or the direct environmental implications are not well understood.

Figure 19 illustrates the improvements in nitrogen fertilizer use efficiency. Bushels produced per pound of nitrogen fertilizer have steadily increased from roughly 0.8 to 1.3 over the past twenty years. Many researchers suspect that genetics is a significant driver for the increases. Root systems are larger, deeper and denser resulting in more effective nitrogen uptake and utilization. General adoption of the 4R concept (right rate, right source, right timing and right placement) is another reason. Improved weed control and the use of different hybrids in different parts of the landscape are other important improvements.

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H. REGIONAL TRENDS AND OPPORTUNITIES FOR ADVANCEMENTS IN NITROGEN MANAGEMENT

The nitrogen best management practices (BMPs) developed by the University of Minnesota (U of M) vary by region, discussed in Chapter 6. This appendix explores regional trends and opportunities for advancement in nitrogen management.

BMP REGION: SOUTHEAST

Marketplace Trends Over the Past 20 Years: The dairy industry has changed significantly over this time period in this region. Since the early 1990's, there has been an 11% reduction in dairy cows, a 42% reduction in alfalfa acres, and a 60% reduction in the number of dairy operations. Many of the small operations, commonly referred to as "scrape and hauls" (no manure storage structures), have been greatly reduced. With the loss in dairy numbers, significant amount of alfalfa, clover, and pasture land acres have been converted to corn/soybean systems. Corn acres have risen 16% over the past 20 years. This has put additional pressure on protecting groundwater resources from nitrate loading.

There are over 55,000 irrigated acres in Dakota and northern Goodhue Counties and this number continues to slowly expand. This will increase the acreage of high nitrogen demanding crops such as potatoes and corn.

Opportunities for Advancements in Nitrogen Management: A recent survey found that the vast majority of nitrogen fertilizer was applied as a spring preplant and the average application rate on corn was 140 pounds per acre (Bierman, et al. 2011). Most of these reported fields were following soybeans with no recent manure applications (past 5 years). Farmers could potentially reduce fertilizer inputs by 20 to 30 pounds per acre through additional soybean crediting.

There have been significant concerns about fall applications in this area. Fall application is a highly visible operation that area farmers and non-farmers are very sensitive to and occasionally complaints are reported to either Minnesota Department of Agriculture (MDA) or county staff. The most recent report (Bierman et al. 2011) indicated that 5% of the nitrogen going onto corn is fall applied. Additional follow-ups with dealerships confirmed that there is a small percentage that does get applied on the heavier soils outside of the traditional karst regions. Early fall applications of manure is probably a much more significant threat.

Proper manure crediting has historically been one of the greatest opportunities for advancements in nutrient management. Several projects, such as within the Whitewater River watershed, has made significant advances in crediting. Future MDA/National Agricultural Statistics Service (NASS) surveys will help better understand the current crediting level.

BMP REGION: SOUTH-CENTRAL

Marketplace Trends Over the Past 20 Years: The hog industry has changed dramatically over this time period. Most of the small operations are no longer in existence, having been replaced by up to 4000 head confinement barns. Many counties in this region have doubled or tripled the hog numbers in the past 20 years. With the increase in hog numbers, manure has become an important nitrogen resource. This region is also the location of many of the counties with the highest production of corn and soybeans.

Opportunities for Advancements in Nitrogen Management: Fertilizer rates on corn are the highest (146 pounds per acre) in the state (Bierman et al. 2011). Nitrogen rates (pounds per acre) ranged from 128 (Rice) to 159 (Faribault). Rates on corn following soybeans frequently exceeded the U of M recommendations by 20 to 30 pounds per acre. Future educational programs are needed to insure that farmers can enjoy the fertilizer savings while reducing nitrate losses to surface waters via tile drainage. Improvements in management will probably have minimal impacts on groundwater resources in the majority of South-Central Minnesota but could be important in subsurface drainage waters.

Over 40% of the primary nitrogen goes on in the fall making this a very important regional practice. Fall nitrogen in this region needs the additional protection from nitrification inhibitors. Based on the Bierman report, half the acreage is using an inhibitor with anhydrous ammonia. Future educational efforts should strive to reduce acres not being treated with inhibitors. Expanded use of inhibitors should help reduce “insurance nitrogen.” Based on expanded analysis¹ of the Bierman (2011) report, fall applications are 12 pounds per acre greater than spring applications in a corn-soybean rotation.

Soil temperatures are also a critical consideration when fall-applying. Currently there is a minimal understanding of how closely temperatures are being considered prior to fall applications. Future educational efforts should focus on identifying ways to make this type of information readily available and considered prior to fall applications.

Fall application of urea is not recommended in this region. In some areas, crop retailers have discontinued selling anhydrous ammonia because of safety concerns. Where this happens, localized education efforts need to focus on the promotion of spring applications.

Lack of proper manure crediting is a statewide issue. Over the past several decades, there has been some critical research completed on nutrient availability especially on hog manure. Through improved recommendations and attention to spreader calibration and technology, livestock farmers have been able to realize the benefits from manure crediting. Many of the spreading challenges have been resolved through the use of certified commercial manure applicators.

BMP REGION: SOUTHWEST AND WEST-CENTRAL

Marketplace Trends Over the Past 20 Years: Relative acres of the major crops has been relatively stable in this region. Perhaps one of the large improvements in terms of fertilizer efficiencies has been in the sugar beet area (includes the Northwest BMP Region). Rates and management have changed drastically when the interaction between beet quality and nitrogen inputs was understood. Large increases in the number of hog systems over the past two decades has changed some of the nutrient management challenges on a localized level. Most of the small operations are no longer in existence having been replaced by confinement barns, often of 6000 head or greater. Many counties in this region have doubled or tripled the hog numbers in the past 20 years. With the increase in hog numbers manure has become a common resource for nitrogen fertilizer. This region is also the location of many of the counties with high production of corn and soybeans. Turkey operations are also a common place in this region with modest growth over the past twenty years.

Opportunities for Advancements in Nitrogen Management: Nitrogen rates (pounds per acre) on corn averaged 139 pounds per acre ranging from 117 (Douglas) to 155 (Redwood). Rates on corn following soybeans frequently exceeded the U of M recommendations by 20 to 40 pounds per acre. Future educational programs are needed

¹ Personal Communication with Denton Bruening, MDA.

to insure that farmers can enjoy the fertilizer savings while reducing nitrate losses to surface waters via subsurface drainage. Improvements in management will probably have minimal impacts on groundwater resources in the majority of this region but could have significant impacts in recharge areas.

Roughly 50% of the primary nitrogen goes on in the fall making this a very important regional practice. Unlike the South-Central Region, the nitrogen BMPs do not recommend nitrification inhibitors or Environmentally Smart Nitrogen (ESN) because there is lower probability of seeing a crop response factoring in the additional economic costs.

Soil temperatures are also a critical consideration. Currently it is difficult to determine how closely temperatures are being considered prior to applications. Future educational efforts should focus on identifying ways to make this type of information readily available and considered prior to fall applications.

In this region, farmers have several nitrogen source options for fall application with either anhydrous ammonia (AA) or urea being acceptable; urea ammonium nitrate (UAN) is not recommended. It is very likely that farmers would attempt to switch to this highly soluble source.

Lack of proper manure crediting is a statewide issue. Over the past several decades, there has been some critical research completed on nutrient availability especially on hog manure. Through improved recommendations and attention to spreader calibration, livestock farmers have been able to realize the benefits from manure crediting. Many of the spreading challenges have been resolved through the use of certified commercial manure applicators.

BMP REGION: NORTHWEST

Marketplace Trends Over the Past 20 Years: Similar to the West-Central Region, perhaps one of the large improvements in terms of fertilizer efficiencies has been in the sugar beet area. Rates and management have changed drastically when the interaction between beet quality and nitrogen inputs was understood. This area has seen a significant change from wheat to more corn and soybeans.

Opportunities for Advancements in Nitrogen Management: Nitrogen rates on corn were the lowest in the state (131 pounds per acre, (Bierman et al. 2011)) with a very large percentage (89%) going on in the spring. Due to the high pH soils, atmospheric losses from non-incorporated urea may pose the biggest economic threat to farmers. Soil testing for nitrogen, especially on wheat and beets, is also common. Wheat was the dominate crop in this region. Farmer's practices for nitrogen management are not well documented in regards to wheat. Likewise nitrogen management for potatoes is not well documented in this region.

Documenting nitrogen management for wheat and potatoes would provide a basis to analyze nitrogen use. Providing nitrogen management education for farmers adapting corn and other southern crops in their rotations would also be beneficial. Future MDA/NASS surveys will help better understand the current crediting level.

BMP REGION: COARSE-TEXTURED SOILS

Marketplace Trends Over the Past 20 Years: Irrigation development has had a profound impact on localized areas within the Central Sands and Dakota/Goodhue Counties. Statewide, irrigated acres have

increased by 9% over the last decade. Some counties, such as Morrison, have shown irrigated acreage increases over 20%.

Opportunities for Advancements in Nitrogen Management: Nitrogen rates ranged from 112 pounds per acre in Isanti County to 162 pounds per acre in Chisago County. Timing indicated that 95% of nitrogen fertilizer was applied either in the spring (70%) or as a split application (25%). The area that warrants the greatest education resources in the coarse-textured soil will undoubtedly be irrigation water management. As irrigation acres continue to expand, it is imperative that farmers are provided with the knowledge and tools to accurately manage water and nitrogen as they transition from low input, dry land management into highly managed irrigated crops.

MDA PRIVATE WELL SAMPLING AND SITE INVENTORY GUIDANCE

GROUNDWATER NITRATE-NITROGEN TOWNSHIP SAMPLING

Private well and/or irrigation well water samples will be collected from townships in sensitive areas.

Groundwater Monitoring Data Analysis:

1. Summary statistics of groundwater nitrate-nitrogen results.
2. Summarize survey information which includes well depth, well age, and well construction. Wells that are of hand-dug construction will not be included in the statistical data analysis.
3. Collection of all relevant groundwater information including, but not limited to:
 - Has a geologic county atlas been conducted?
 - If yes, many well logs are available and may be linked to the County Well Index.
 - What is the drinking water profile of the community? What is the ratio of well types?
 - Age dating information available?

NITROGEN FERTILIZER SOURCE CONFIRMATION

Nitrogen fertilizer source will be confirmed before a township moves into Level 3, which is regulatory. Wells with high (>5 mg/L) nitrate-nitrogen results will be screened with the following possible sources:

1. Septic Sources of Nitrate:
 - Are there septic systems in the immediate vicinity of the well(s) that may be impacting groundwater?
 - Is the area served by a municipal sanitary sewer?
 - What is the general condition of septic systems in the area? Percent failing? Are they required to be checked at point of sale?
 - Are there other parameters that may suggest septic systems could be a nitrate contamination source; e.g. fecal coliform, caffeine, etc.
2. Feedlot Sources of Nitrate:
 - Are feedlots in the area?
 - Is manure commonly applied in the area?

3. Land Use Practices:

- What percent of the land is in corn, potatoes, sod farms, or other crops that may have significant nitrate applications in the area of concern?
- Is irrigation taking place in the area?

4. Other Nitrate Sources:

- Are significant quantities of wastewater applied in the area of concern?

J. REGULATED MITIGATION GUIDANCE

This guidance document describes the circumstances under which regulations may be adopted to accomplish mitigation goals. The following are the key elements from Minnesota Statutes, section 103H.275 regarding the adoption by rule of Water Resource Protection Requirements (WRPRs) to protect groundwater:

1. WRPRs may only be adopted if best management practices (BMPs) are proven to be ineffective;
2. WRPRs must be commensurate (proportional) with the groundwater pollution;
3. WRPRs must be consistent with the degradation prevention goal of the Groundwater Protection Act, and be designed to prevent and minimize the pollution to the extent practicable;
4. WRPRs must be designed to prevent the pollution from exceeding Health Risk Limits (HRLs); and
5. WRPRs must be based on –
 - a. Use and effectiveness of BMPs
 - b. Nitrogen fertilizer use and practices contributing to the pollution detected
 - c. Economic factors
 - d. Availability
 - e. Technical feasibility
 - f. Implementability
 - g. Effectiveness

Based on these statutory requirements, the following is general guidance that will be used by the Minnesota Department of Agriculture (MDA) when evaluating the need for proposed adoption of WRPRs by rule:

1. WRPRs may be adopted by the commissioner if:
 - a. BMPs are proven to be ineffective; and
 - b. The commissioner determines that regulatory action is required because of significant or widespread exceedances of the HRLs.

OR

2. WRPRs may be adopted by the commissioner if:
 - a. BMPs are proven to be ineffective; and
 - b. One of the following conditions exist:
 - i. The pollution exceeds, or is at risk of exceeding, the HRLs; or
 - ii. The WRPRs would be proportional with the groundwater pollution.
 - c. If the BMPs are, or appear to be, ineffective, and BMP adoption data supports that the BMPs are being adopted, then other tools will be explored and considered in order to achieve the goals of the Groundwater Protection Act.

While prevention of groundwater degradation (i.e., zero pollution) is a goal of the act, it is not a requirement. The act repeatedly uses the term “to the extent practicable” and directs the MDA to recognize potential limitations to achieving non-degradation, and that non-degradation may not in some circumstances be practicably achievable. This is further reemphasized by the requirement that WRPRs must be proportional with the groundwater pollution.

If successful, the BMPs will provide for the minimum amount of nitrogen fertilizer to be used while still achieving economic profitability. It is possible that some contamination of groundwater at concentrations below the HRLs will occur. Under the Groundwater Protection Act, it is recognized that for some human activities the degradation prevention goal cannot be practicably achieved; however, pollution should be prevented and minimized to the extent possible.

The act directs similar goals and considerations for the development of both BMPs and WRPRs. Both are intended to prevent and minimize pollution to the extent practicable in consideration of several specific and similar criteria. Therefore, if required, WRPRs should be similar to the BMPs.