

January 4, 2019

David Frederickson, Chair
Minnesota Environmental Quality Board
625 Robert Street North
St. Paul, MN 55155

Dear Chair Fredrickson:

In follow-up to our discussion at the December 19, 2018, Minnesota Environmental Quality Board (EQB) meeting, I am formally requesting that the EQB order a generic environmental impact statement (EIS) under Minn. Rules pt. 4410.3800, subp. 3 to study and address nitrate pollution of groundwater in the geologically sensitive karst region of southeastern Minnesota.

As you know, the karst region is particularly susceptible to rapid seepage of contaminants from the land and overlying soils, making the groundwater of this region very vulnerable to contamination. The Minnesota Department of Health (MDH) and the Minnesota Department of Agriculture (MDA) together have extensive data documenting nitrate contamination of public and private drinking water wells. In particular, data recently compiled via the MDA Township Testing Program have found numerous townships in the karst region with private wells at or above the 10 milligrams per liter health risk limit for nitrate.

Nitrate in drinking water can pose a health risk to people, especially infants and the elderly. It is important to have a sound understanding of the sources of nitrate contamination of groundwater in order to properly minimize and manage potential impacts. However, this issue of nitrate contamination is bigger than any one project or site, and merits a generic EIS.

A generic EIS can help Minnesota citizens, businesses, and decision-makers better understand the nature, extent and sources of the nitrate contamination. This will provide insight into the actions needed to address the existing contamination that is the cumulative effect of current practices and activities, as well as inform the review of new projects. Such a generic EIS could be scoped to focus on the sensitive karst region of Minnesota, or could be expanded to include all areas with data showing nitrate contamination of groundwater.

I understand that completing such an EIS will require time and resources. While a decision is pending on a generic EIS, and while a generic EIS is underway if one is ordered, project-specific environmental review will continue as required by Minn. Rules pt. 4410.3800, subpts 8 and 9. The MPCA will continue to work with project proposers within our authority to mitigate potential impacts from new or expanding projects. At the same time, I strongly urge EQB to pursue a generic EIS as noted above, to provide the additional information needed to take a more holistic view of this significant problem, and to help Minnesota to go beyond mitigating the impact of new projects to also better address the existing nitrate contamination that already threatens human health and our environment.

Sincerely,



John Linc Stine
Commissioner

cc: Will Seuffert, EQB Executive Director