

# **Attachment A**

## **Comment Summaries**

Nolte Family Irrigation Project EAW Record of Decision

June 18, 2020

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## Introduction

The Minnesota Department of Natural Resources (DNR) released the Nolte Family Irrigation Project (the Project) Environmental Assessment Worksheet (EAW) for public review on April 6, 2020. The public comment period closed on May 6, 2020. DNR received 98 written letters or e-mails on the EAW from various state and local agencies, non-governmental groups, and citizens. An alphabetical listing of commenters, arranged by organization or last name of the commenter, follows in the table below.

A unique comment identification (Comment ID) correlates individual comments within each comment document. If a comment letter consisted of more than one comment, letters were assigned to the comment ID (e.g., 11a-z). Where feasible, DNR has grouped similar comments together and responded to a comment representative of the grouping (i.e., Comment Topic). These grouped responses are found within the Record of Decision (ROD). This improves the readability of the ROD and helps to show common themes expressed by commenters. In accordance with Minnesota Rules, part 4410.1700, Subpart 4, DNR gave due consideration to all substantive and timely comments on the content of the EAW and a response was provided.

Comment letters are available upon request.

There were a number of comments received during the public comment period that were considered non-substantive for a variety of reasons, such as an opinion, request to approve or deny a permit application, or general statement about the Project by the commenter. These comments did not address the accuracy or completeness of the material contained in the EAW or environmental impacts and did not warrant further investigation prior to the final ROD. In accordance with Minn. R. 4410.1700, Subp. 4, these comments did not receive a specific response.

## Reader Tip

You can search for a specific comment ID when using the electronic version of the document.

- First, locate the unique commenter ID (e.g., 11) in the following table
- Next, do one of the following:
  - Choose Edit >Find, or
  - Ctrl+F (for PC) or Command – ⌘+F (for Mac)
- Type in the commenter ID in the search box.

Comment ID	Commenter Name	Comment Received	Comment Topic	Comment Summary
55	Anderson, Jim	5-May-20	Non-Substantive	see comment letter 04
10	Barrett, Michael	9-Apr-20	Non-Substantive	see comment letter 04
52	Becker, Todd and Renee	5-May-20	Non-Substantive	see comment letter 04
79	Bilek, Amanda, Minnesota Corn Growers Association	6-May-20	Non-Substantive	see comment letters 04 and 37
24	Biscoe, Steve	20-Apr-20	Non-Substantive	see comment letter 04
58	Bohmer, Dave	5-May-20	Non-Substantive	see comment letter 04
57	Brataas, Anne	5-May-20	Non-Substantive	Commenter urges proper oversight and strict permitting of irrigation wells for the wellbeing and future of all.
13	Bregier, Anna PFC Development company	7-Apr-20	Non-Substantive	see comment letter 04
78	Breitkreutz, Dawn	6-May-20	Non-Substantive	Commenter supports the Noltes, praises their farming practices and feels they have been put in this situation unfairly
60	Breitkreutz, Grant	5-May-20	Non-Substantive	Commenter supports Nolte's practices.
89a	Broberg, Jeff, Well Owners Association	6-May-20	EIS Need	Commenter requests an Environmental Impact Statement (EIS) followed by a contested case hearing for the proposed Water Appropriation Permits.
89b	Broberg, Jeff, Well Owners Association	6-May-20	Relationship with RDO	Commenter asserts the proposed project is one piece of a connected action where planned future stages of expanded irrigated row crop production of potatoes in the Pineland Sands for RD Offutt is not adequately addressed
89c	Broberg, Jeff, Well Owners Association	6-May-20	Non-Substantive	Commenter requests that their comments and all attachments be included as part of the EAW's administrative records.

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89d	Broberg, Jeff, Well Owners Association	6-May-20	EIS Need	Commenter asserts that a mandatory EIS should be required based on Minnesota Rules 4410.2000, subp. 4 (Connected or Phased actions).
89e	Broberg, Jeff, Well Owners Association	6-May-20	Cover Types and Land Use	Commenter questions the acreage assigned for the various land use cover types in the EAW.
89f	Broberg, Jeff, Well Owners Association	6-May-20	Mitigation Sufficiency	Commenter believes EAW Item 8 (Permits and Approvals) misrepresented the Minnesota Agricultural Water Quality Certification Program (MAWQCP).
89g	Broberg, Jeff, Well Owners Association	6-May-20	Cover Types and Land Use	Commenter asserts that the Land Use description in EAW Item 9 is inaccurate.
89h	Broberg, Jeff, Well Owners Association	6-May-20	Geology and Soil	Commenter asserts that the geology and soil description in EAW Item 10 is inadequate and/or inaccurate and provides their professional/personal opinion of relevant information for consideration.
89i	Broberg, Jeff, Well Owners Association	6-May-20	Aquifer Test/Groundwater	Commenter asserts that data on the nearby wells (well construction, well depths and aquifers) are important details to understand if shallow groundwater will occur.
89j	Broberg, Jeff, Well Owners Association	6-May-20	Water Quality	Commenter asserts that the EAW stormwater assessment is incomplete without assessing the water quality of the shallow groundwater recharge.
89k	Broberg, Jeff, Well Owners Association	6-May-20	Aquifer Test/Groundwater	Commenter expresses concern about the impacts of the water appropriation.
89l	Broberg, Jeff, Well Owners Association	6-May-20	Mitigation Sufficiency	Commenter expresses concern about nitrate contamination and cites the Byron study.
89m	Broberg, Jeff, Well Owners Association	6-May-20	Water Quality	Commenter is concerned about water quality at a watershed scale.
89n	Broberg, Jeff, Well Owners Association	6-May-20	Mitigation Sufficiency	Commenter appears to have concerns about the Minnesota Agricultural Water Quality Certification Program (MAWQCP)

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89o	Broberg, Jeff, Well Owners Association	6-May-20	Water Quality	Commenter asserts the discussion of pesticides and their mitigation measures fails to address the baseline water quality from the wells in the vicinity or from the three existing irrigation wells and that modeling should be completed.
89p	Broberg, Jeff, Well Owners Association	6-May-20	Wildlife and Habitat	Commenter believes that the proposed project's land conversion will significantly impact wildlife and habitat in the area by creating barriers to movement and edge effects.
89q	Broberg, Jeff, Well Owners Association	6-May-20	Relationship with RDO	Commenter believes the EAW should include land purchased by RDO and focus on the lands where center pivot irrigation wells have already been drilled but not permitted.
89r	Broberg, Jeff, Well Owners Association	6-May-20	Water Quality	Commenter asserts that groundwater contamination will originate on the cropland due to nitrates and pesticides and will migrate offsite serving to recharge deeper aquifers and discharge to wetlands, streams, and the Redeye River.
89s	Broberg, Jeff, Well Owners Association	6-May-20	Water Quality	Commenter asserts that groundwater contamination above the health risk limit will occur within one to two years of row crop irrigation following forest destruction based on nearby Dept of Agriculture studies. Also that the nutrient contamination will persist as long as annual crops are grown on the site having a cumulative and irreversible impact on the groundwater.
89t	Broberg, Jeff, Well Owners Association	6-May-20	Aquifer Test/Groundwater	Commenter states that the connectivity of the deeper supply aquifers and unconfined surface aquifer is unknown.
89u	Broberg, Jeff, Well Owners Association	6-May-20	EIS Need	Commenter requests a regional EIS.
76	Buntjer, Mark	6-May-20	Non-Substantive	see comment letter 04
84a	Childress, Willa, Pesticide Action Network and the Toxic Taters Coalition	6-May-20	Relationship with RDO	Commenter asserts the EAW should have included the impacts of the RD Offutt Company.

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84b	Childress, Willa, Pesticide Action Network and the Toxic Taters Coalition	6-May-20	Health Impacts	Commenter is concerned about pesticide health impacts.
84c	Childress, Willa, Pesticide Action Network and the Toxic Taters Coalition	6-May-20	Health Impacts	Commenter is concerned about pesticide drift health impacts and states a discrepancy in the number of structures that fall within 1/4 mile of the project area.
84d	Childress, Willa, Pesticide Action Network and the Toxic Taters Coalition	6-May-20	Water Quality	Commenter expresses ground and surface water quality concerns with respect to nitrate and pesticide contamination for the nearby domestic wells and recommends that the project proposer fund mitigation for impacted nearby wells.
84e	Childress, Willa (Toxic Taters Coalition) and Emily Marquez (Pesticide Action Network)	6-May-20	Relationship with RDO	Commenter appears to assert that the EAW should have included the CPE of the RD Offutt Company's activities in the evaluation.
33	Cox, Robert	20-Apr-20	Non-Substantive	see comment letter 04
35	Diekmann Farms, Inc.	21-Apr-20	Non-Substantive	see comment letter 04
80	Neal, Craig	6-May-20	Non-Substantive	Support on behalf of the Wadena County Farm Bureau.
64	Dukowitz, Roger	6-May-20	Non-Substantive	Commenter asserts the environmental review rules need to change and that the Nolte family should be reimbursed.
36a	Eckenrode, Richard and Bernice	27-Apr-20	Aquifer Test/Groundwater	Commenter has concerns about the aquifer test wasting water, timing and use of pumped water and no public input.
36b	Eckenrode, Richard and Bernice	27-Apr-20	Non-Substantive	Commenter is concerned about the financial and emotional impacts of this EAW process on the Nolte family.

Comment ID	Commenter Name	Comment Received	Comment Topic	Comment Summary
74	Erickson, Steve	6-May-20	Non-Substantive	Claims not to be in support on one side or the other. Suggests the state consider a different approach, such as mediation and provides his personal and/or professional accounts of the past and present.
02a	Etzel, Jim	7-Apr-20	EIS Need	Commenter requests an EIS for the Pineland Sands area.
02b	Etzel, Jim	7-Apr-20	Relationship with RDO	Commenter claims EAW is not about Nolte, but rather RD Offutt
20	Fischer, Byron	16-Apr-20	Non-Substantive	see comment letter 04
83	Formo, Warren	6-May-20	Cover Types and Land Use	Commenter asserts that the concern of the opposition is directed toward extent of ag production "suggesting future massive expansion of irrigation..." Commenter provided data about cropland in Wadena County. States that the Nolte proposal should go forward.
14	Fox, Ben	14-Apr-20	Non-Substantive	see comment letter 04
49	Fronning, Adam	5-May-20	Non-Substantive	see comment letter 04
19	Giese, Norman & Renae	15-Apr-20	Non-Substantive	Commenter believes DNR is overreaching its authority (e.g., daming up public water, water volume controls, water quality).
54	Gillespie, Chuck	5-May-20	Non-Substantive	Commenter provides personal and rhetorical accounts of forest to field land conversions. A question of the appropriation operation along with a request for DNR to make this a priority.
65	Goeden, Kevin and Gail	6-May-20	Non-Substantive	see comment letter 04
95	Gorentz, Jonathan	6-May-20	Non-Substantive	see comment letter 04
73	Graff, Glen	6-May-20	Non-Substantive	Commenter provides general letter of support for the Nolte Project due to their proposed mitigation.

Comment ID	Commenter Name	Comment Received	Comment Topic	Comment Summary
18	Gray, Paul and Gary, Gray Potato Farm	15-Apr-20	Non-Substantive	see comment letter 04
30	Hague, Earl	20-Apr-20	Non-Substantive	see comment letter 04
22	Halverson, Ronald	16-Apr-20	Non-Substantive	Commenter supports project because of proposed mitigation.
23a	Halverson, Ryan	17-Apr-20	Non-Substantive	see comment letter 04
23b	Halverson, Ryan	18-Apr-20	Non-Substantive	Commenter is concerned about DNR's monitoring and efforts against irrigators.
45	Hammer, Tom	5-May-20	Non-Substantive	see comment letter 04
96	Helfter, Tom	6-May-20	Non-Substantive	Received late - 11:27PM; Request to approve the permit.
17	Herickhoff, Kurt, Central MN Seeds, LLC	15-Apr-20	Non-Substantive	see comment letter 04
67	Hoge, Kevin & Carol	6-May-20	Non-Substantive	Commenter supports the Nolte operation.
98	Horsager, Chuck, Wadena County Commissioner	19-May-20	Non-Substantive	Received late--5/19; in support of project
12	Hultgren, Nate, Hultgren Farms	14-Apr-20	Non-Substantive	see comment letter 04
21	Hultgren, Noah	16-Apr-20	Non-Substantive	see comment letter 04
37a	IAM - Irrigator's Association of Minnesota	30-Apr-20	Non-Substantive	Commenter expresses concern about the cost of an EAW.

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37b	IAM - Irrigator's Association of Minnesota	30-Apr-20	Aquifer Test/Groundwater	Commenter expresses concern about testing requirements.
37c	IAM - Irrigator's Association of Minnesota	30-Apr-20	EIS Need	Commenter states an EAW should not be required for irrigation permit applications.
37d	IAM - Irrigator's Association of Minnesota	30-Apr-20	EIS Need	Commenter seems to recommend that water quality concerns (causes and sources) be conducted through a large scientific study/analysis to be paid for by an entity other than a project proposer.
37e	IAM - Irrigator's Association of Minnesota	30-Apr-20	Mitigation Sufficiency	Commenter mentions other programs and monitoring provided by Minnesota Department of Agriculture (MDA) and Minnesota Department of Health (MDH).
94	Kaschmitter, Glen	5-May-20	Non-Substantive	see comment letter 04
90a	Keehr, Darwin	6-May-20	Non-Substantive	Commenter supports the Noltes, praises their farming practices and feels they have been put in this situation unfairly.
90b	Keehr, Darwin	6-May-20	Non-Substantive	see comment letter 04
88a	Kleven, Bruce MSCA	6-May-20	Non-Substantive	Commenter disapproves of the Environmental Review Need Determination.
88b	Kleven, Bruce MSCA	6-May-20	Non-Substantive	see comment letter 04
85a	Konopacky, Jaime EWG	6-May-20	Relationship with RDO	Asserts project is an RDO project, and that land conversion risk and phased nature of RDO expansion
85b	Konopacky, Jaime EWG	6-May-20	Mitigation Sufficiency	Asserts that Byron Twp Study is evidence that BMPs are ineffective for protecting groundwater from contamination
85c	Konopacky, Jaime EWG	6-May-20	Cover Types and Land Use	Commenter asserts CPE include historic/forecasted trends of land conversion in assessment

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85d	Konopacky, Jaime EWG	6-May-20	CPE	Commenter asserts that the EAW used an overly narrow geographic scope for CPE groundwater assessment.
85e	Konopacky, Jaime EWG	6-May-20	CPE	Commenter asserts CPE for groundwater contamination include baseline nitrate levels from manure application for the entire Pineland Sands Area.
85f	Konopacky, Jaime EWG	6-May-20	Cover Types and Land Use	Commenter asserts that EAW fails evaluate deforestation that occurred on the 303 acres of the proposed project
85g	Konopacky, Jaime EWG	6-May-20	Aquifer Test/Groundwater	Commenter asserts that the EAW is missing an assessment of groundwater pollution-private wells-surface water-interaquifer impacts.
85h	Konopacky, Jaime EWG	6-May-20	Mitigation Sufficiency	Assert that MAWQCP is for existing Nolte farming not the proposed 303 acres
85i	Konopacky, Jaime EWG	6-May-20	Aquifer Test/Groundwater	Commenter asserts that an aquifer test is needed.
85j	Konopacky, Jaime EWG	6-May-20	Health Impacts	Commenter asserts that extent and types of chemical inputs are needed.
38	Koob, Gregory	30-Apr-20	Non-Substantive	Commenter provides personal accounts of their family's practices, recollections of public meetings in the Little Rock Creek area, and states supports DNR's efforts to explain the facts.
62	Krause, Norman	6-May-20	Non-Substantive	see comment letter 04
56	Kroll, Duane	5-May-20	Non-Substantive	see comment letter 04
51a	Kromar, Karen (MPCA)	5-May-20	Non-Substantive	Commenter notes some incorrect or missing references and typos.

Comment ID	Commenter Name	Comment Received	Comment Topic	Comment Summary
51b	Kromar, Karen (MPCA)	6-May-20	Water Quality	<p>Commenter clarifies information provided in the EAW from the 2014 Monitoring and Assessment Report and the 2016 Watershed Restoration and Protection Strategies (WRAPS) Report for the Redeye River:</p> <ul style="list-style-type: none"> <li>o That the list of stream water quality standards should include aquatic recreation, and drinking water should be removed.</li> <li>o The WRAPS Report (MPCA 2016) found aquatic life stressors, including dissolved oxygen, turbidity, and measures of fish and macroinvertebrate health fail to meet water quality standards in some reaches.</li> <li>o The Monitoring and Assessment Report (MPCA 2014) states wind and water soil erosion, surface and groundwater management/quality, changing land use patterns, increased groundwater withdrawal trends, and bacteria (E.coli) are of highest concern in this watershed. Recent expansion of irrigated agriculture has primarily been in the adjacent Crow Wing River Watershed, but is occurring in this watershed as well.</li> </ul>
51c	Kromar, Karen (MPCA)	7-May-20	CPE	<p>Regarding Item 19 (Cumulative Potential Effects), commenter agrees that based on the geographic area and timeline for the proposed Project, the overall cumulative nature of potential environmental effects to surface water contamination from the proposed Project, and those within the geographic area, are expected to contribute minimally to any contamination of surface water, if all recommendations included in the EAW are followed and no unexpected conditions occur. Additionally, though the likelihood of significant contamination is low, the potential is substantially greater than it was under historic land use conditions.</p>

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51d	Kromar, Karen (MPCA)	8-May-20	CPE	Regarding Item 19 (Cumulative Potential Effects), commenter states that when considering the environmental impacts of pesticide use, it is important to understand that the impacts of some pesticides are felt well beyond the area in which they are applied. Pollinators often have ranges up to several miles, and carry pesticide-contaminated pollen or nectar with them while foraging. For example, honeybee hives located in central Minnesota, miles from the nearest agricultural lands, have been found to have elevated levels of chlorothalonil and chlorpyrifos in the comb. When pollinator populations are impacted by pesticides, the effect will also be felt in native and non-native plant communities that are dependent on pollinators to maintain ecosystem integrity. Changes in plant communities can affect wildlife populations. In short, even if pesticide application best management practices are followed exactly as prescribed, there will be environmental impacts because of their use.
81a	Kyar, Gail	6-May-20	Non-Substantive	Commenter asserts that the project should not be rejected due to association with potato farmers. Commenter praises Nolte's stewardship of the land
81b	Kyar, Gail	7-May-20	Non-Substantive	Commenter asserts that petition signers may not have been aware of what they were signing and that anyone outside the area should not be deciding farm matters they have no knowledge of.
68	Kyar, Kevin	6-May-20	Non-Substantive	Commenter supports the Noltes, asserts the DNR is not justified in the environmental review process. Supports permitting in a timely manner.
71	Landuyt, Michael	6-May-20	Non-Substantive	Commenter provides general letter of support for the Nolte Project due to their proposed mitigation.
25	Larson, Jerry	20-Apr-20	Non-Substantive	see comment letter 04
87a	Lindberg, Eric, MCEA	6-May-20	Relationship with RDO	Commenter asserts that the project is actually an RDO project and future phases of RDO expansion must be included in the assessment

Comment ID	Commenter Name	Comment Received	Comment Topic	Comment Summary
87b	Lindberg, Eric, MCEA	6-May-20	Aquifer Test/Groundwater	Commenter asserts that the EAW does not include an assessment of water resources available (need for aquifer test), impact to wells and surface water.
87c	Lindberg, Eric, MCEA	6-May-20	Cover Types and Land Use	Commenter is concerned that groundwater contamination from land conversion for irrigation projects is becoming a regional issue.
87d	Lindberg, Eric, MCEA	6-May-20	CPE	Commenter asserts the EAW needs to evaluate project GHG emissions.
87e	Lindberg, Eric, MCEA	6-May-20	Cover Types and Land Use	Commenter asserts that information is needed on the project compatibility with Wadena County Local Water Resource Management Plan.
11	Lindow, Steve	9-Apr-20	Non-Substantive	Commenter opposes the proposed project because of land clearing and nitrate leaching into drinking water.
91a	Mattison, Willis	6-May-20	EIS Need	Commenter is concerned about environmental degradation at a regional scale.
91b	Mattison, Willis	6-May-20	CPE	Commenter asserts this project has the potential for cumulative potential effects.
91c	Mattison, Willis	6-May-20	Aquifer Test/Groundwater	Commenter asserts that an EIS is needed because: A. “statistical analyses” were not yet conducted; and B. because “connectivity of the water table system to the source aquifer...is not known”, and C. “pumping impacts on nearby wetlands” are deferred to a later permitting process; and D. The aquifer test needed to evaluate pumping impacts on wetlands and the Red Eye River are also deferred to the permitting process; and E. There is not enough data to know how additional irrigation permits may change the groundwater supply, and potentially the quality of nearby lakes, streams and wetlands.

Comment ID	Commenter Name	Comment Received	Comment Topic	Comment Summary
91d	Mattison, Willis	6-May-20	Water Quality	Commenter asserts the EAW makes the following incorrect or at least misleading statement based on the Red Eye River WRAPS Plan: “Land conversion from forest to irrigated row crop agriculture has not been identified as a significant source of water quality concerns within the Redeye River Watershed.”
91e	Mattison, Willis	6-May-20	Wildlife and Habitat	Commenter asserts that the summary statement that no endangered species may be impacted by the proposed project belies what DNR knows about population declines in broad taxonomic groups ranging from insects, to birds, reptiles, amphibians and some mammal species.
91f	Mattison, Willis	6-May-20	Mitigation Sufficiency	Commenter is concerned about whether label restrictions or BMP practices are indeed accomplishing the protections intended.
91g	Mattison, Willis	7-May-20	Mitigation Sufficiency	Commenter states the EAW should provide an assessment of the likelihood (potential) that the proposer's mitigating measures, even if implemented fully will in fact effectively avoid adverse impacts entirely or minimize impacts below a level of potential significance, and that the appropriate action is to complete an EIS.
43	McCleery, Martin, Ten Mile Lake Association	5-May-20	Water Quality	Commenter expresses groundwater quality concerns in the Ten Mile Lake Watershed area and over the greater Pineland Sands area, asserting the RD Offutt is the cause. Commenter requests DNR review and correct the problem and suggests that those who contaminate should pay for clean-up.
46	Miller, Gene	5-May-20	Non-Substantive	see comment letter 04
15	Miller, Ron	15-Apr-20	Non-Substantive	Commenter believes DNR should grant a permit.
16	Molitor, William, Re/Max Results	15-Apr-20	Non-Substantive	see comment letter 04
59	Munneke, Robert and Darlene	5-May-20	Relationship with RDO	Commenter requests environmental review of RD Offutt, citing the damage they are doing.

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47	Murn, Jim	5-May-20	Non-Substantive	see comment letter 04
86	Olander, Keith	6-May-20	Non-Substantive	see comment letter 04
50	Olson Farms	5-May-20	Non-Substantive	Commenter submitted a blank PDF.
32	Peterson, Raymond	22-Apr-20	Non-Substantive	Commenter expresses general favor of granting a permit and talked about wells being used for filling fire engines.
01	Pickar, Kelly	6-Apr-20	Non-Substantive	Commenter requests that the project proposer be allowed to farm the land.
97	Reichmann Land and Cattle	5-May-20	Non-Substantive	see comment letter 04
69	Riepe, Mark	6-May-20	Non-Substantive	see comment letter 04
66	Roelofs, Becky	6-May-20	Non-Substantive	see comment letter 04
29	Roth, Brenda	20-Apr-20	Non-Substantive	In favor of continuing with irrigation plan for Nolte family
28	Roth, Brian	20-Apr-20	Non-Substantive	In favor of continuing with irrigation plan for Nolte family
34	Roth, Eileen	17-Apr-20	Non-Substantive	In favor of continuing with irrigation plan for Nolte family
26	Roth, Nancy	20-Apr-20	Non-Substantive	In favor of continuing with irrigation plan for Nolte family
40	Sanford, Paul	5-May-20	Non-Substantive	Commenter believes DNR is overreaching its authority and states that precedent has been set and should be maintained.
53a	Scheer, Kent	5-May-20	Non-Substantive	Commenter requests DNR to cease irrigation well permitting in the shallow aquifer regions of Minnesota.
53b	Scheer, Kent	5-May-20	Water Quality	Commenter cites nitrate concern and potable water sourcing around Park Rapids and asserts it was caused by sloppy farming.

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53c	Scheer, Kent	5-May-20	Non-Substantive	Commenter suggests three solutions: more rigorous permitting/oversight in the Pineland Sands area, higher user fees, and user bond payments.
06	Schlichting, Marlene, Schlichting Farms, Inc.	7-Apr-20	Non-Substantive	see comment letter 04
07	Schlichting, Richard, Schlichting Farms, Inc.	7-Apr-20	Non-Substantive	see comment letter 04
05	Schlichting-Hicks, Jocelyn, Schlichting Farms, Inc.	7-Apr-20	Non-Substantive	see comment letter 04
41	Schock, Andrew	5-May-20	Non-Substantive	see comment letter 04
39	Schultz, Jake	4-May-20	Non-Substantive	Commenter praises Nolte's stewardship of land, DNR should not make things difficult for farmers, everyone (rural, lake homes, city homes) all contribute to water quality. Hopes the DNR grants the permit.
44	Skroch, Mark	5-May-20	Non-Substantive	see comment letter 04
72	Sleiter, Dennis	6-May-20	Non-Substantive	Commenter provides general letter of support for the Nolte Project due to their proposed mitigation.
93	Staloch, Pat	29-Apr-20	Non-Substantive	see comment letter 04
77	Syltie, Fletcher	6-May-20	Non-Substantive	Commenter seems to support the Nolte Family Farm and project
61	Tauber, Mike	6-May-20	Relationship with RDO	Commenter asserts the proposed project is a phase of a larger RDO project and provided numerous attachments with a primary focus on the RD Offutt Company. Neonics-coated seeds. Selenium and coronavirus, Well Borings. Soil Reports. Land Conversion Powerpoints. Fungicide fact sheets. Byron Study excerpts. Geology and water quality reports. No instruction on what information may have been missing or inaccurate in EAW.

Comment ID	Commenter Name	Comment Received	Comment Topic	Comment Summary
63	Thompson, Jake	6-May-20	Non-Substantive	see comment letter 04
03a	Trainor, Joe	7-Apr-20	Aquifer Test/Groundwater	Commenter is concerned about the timing and use of the aquifer test.
03b	Trainor, Joe	7-Apr-20	Geology and Soil	Commenter is concerned about sandy soils which are vulnerable to leaching.
03c	Trainor, Joe	7-Apr-20	Straight River	3. Groundwater discharge into the Straight River.
03d	Trainor, Joe	7-Apr-20	Mitigation Sufficiency	Commenter is concerned about the enforceability of the MAWQCP certification, commitment of the project proposer following BMPs and future landowners.
03e	Trainor, Joe	7-Apr-20	Non-Substantive	Commenter provides opinion that water appropriation should be permitted on a more broad area rather than farm-by-farm.
48	Van Beusekom, Brian	5-May-20	Non-Substantive	Commenter believes DNR is overreaching its regulatory authority.
31	Wagner, Kathryn	21-Apr-20	EIS Need	Commenter cites general land use and water quality concerns for the greater Pineland Sands area and requests that DNR do an EIS on Pineland Sands Project in Cass County.
09a	Wenthold, Randy	9-Apr-20	Health Impacts	Commenter states that no one (at any agency) has discussed the issues regarding chemical exposures from RD Offutt or any family LLC farm for potato production.
09b	Wenthold, Randy	9-Apr-20	Health Impacts	Commenter provides a list of chemicals being used and expresses concern regarding contamination and health concerns.
09c	Wenthold, Randy	9-Apr-20	Aquifer Test/Groundwater	Commenter is concerned about effect of running hundreds of gallons a minute of pivot well water.
70a	Whitney, Daniel and Mary Osborne-Whitney, Northwest AquaTek Solutions	6-May-20	Mitigation Sufficiency	Commenter provides many areas of agreement with DNR's EAW and lists the proposer's mitigation measures.

Comment ID	Commenter Name	Comment Received	Comment Topic	Comment Summary
70b	Whitney, Daniel and Mary Osborne-Whitney, Northwest AquaTek Solutions	6-May-20	Cover Types and Land Use	Commenter believes DNR's description of the proposed project area (past and current) is misleading.
70c	Whitney, Daniel and Mary Osborne-Whitney, Northwest AquaTek Solutions	6-May-20	Geology and Soil	Commenter asserts that statements in an EAW (e.g., Item 10b) require a scientific reference in order to qualify something as high, medium, or low impact (e.g., high v low nitrate leaching potential).
70d	Whitney, Daniel and Mary Osborne-Whitney, Northwest AquaTek Solutions	6-May-20	Mitigation Sufficiency	Commenter notes that the conservation plan developed by the Wadena SWCD for the proposed irrigation systems was provided to the Nolte Farm November 14, 2019.
04	Wojtanowicz, Diane Prairie Farm Company	7-Apr-20	Non-Substantive	Commenter is in favor of the project and states that because of proposed mitigation, there is not potential for significant environmental effects. Commenter supports the closure of the EAW and approval of water appropriation permits for Nolte Family.
08	Wojtanowicz, Max, Shareholder Prairie Farms, Inc.	8-Apr-20	Non-Substantive	see comment letter 04
75	Wollum, Kristi	6-May-20	Non-Substantive	Commenter provides general letter of support for the Nolte Project due to their proposed mitigation.
42	Yaggie, Connie	5-May-20	Non-Substantive	see comment letter 04
82	Zeltwanger, Eric	6-May-20	Non-Substantive	Commenter supports the Noltes, praises their farming practices and feels they have been put in this situation unfairly
92	Zimmerman, Dean	28-Apr-20	Non-Substantive	see comment letter 04