

Roots Return Heritage Farm LLC



E-Mail: rootsreturn@gmail.com

Date: March 19, 2025

To: MN House of Representatives Members of Taxes Committee, Chairs Davids and Gomez, Vice-Chairs Joy and Norris (via email)

RE: Oppose [HF 363 \(Jacob\)](#)

Greetings Representatives:

Representative Jacob's bill proposing a \$5/acre MN Property Tax Credit for agricultural producers 'certified' under MDA's MN Agricultural Water Quality Certification Program ([MAWQCP](#)) is misguided. Proposing a credit will not provide any more clean water outcomes, nor has the last 11 years of the program's existence. I served 6 yrs on the advisory board and was proud to help provide more conservation practices on MN acres. However, **there are no measurements the program uses to claim improved water quality outcomes. If you place a rubber membrane underneath, and walls around ag parcels emitting pollution, you will improve water quality.** Since that isn't realistic, anyone should be able to state with ease how practice A will provide 'assurance' of water quality outcome B. Modeling doesn't explain outcomes achieved, measurements do per our state agency monitoring reports. This credit could provide Representative Jacob's 108 acre parcel a **\$540 credit on \$3,068 property tax**. Ag organizations supporting see another offer of taxpayer subsidy.

Perennial use of synthetic nitrogen, oversupply of manure, neonic coated seeds, chemical sprays, tillage, drain tile does not 'assure' water quality. All practices are producer choice and these practices are allowed on 'certified' acres. There are amazing producers implementing conservation practices on their lands, but there simply aren't enough producers making positive, non-polluting changes. We have experienced the EPA having to step in when our state agencies didn't for high nitrogen in private wells. This is in Representative Jacobs district and regions of SE MN. Per the [2022 USDA Ag Census](#), the majority of acres in MN still implement no conservation practices, nor is agricultural pollution ceasing to exist.

I asked MDA to review with our advisory board agricultural pollution and water quality reports provided by them, MPCA, DNR, MDH to help guide the program's efforts where its most needed. My request was met with anger and refusal to review the very data needed to make quantified decisions. Because of no measuring in-field, edge-of-field, or drain tile discharge, **hard data of the program's efficacy are missing.** Number of acres and farmers enrolled does not equal improved water quality. I live in a [DWSMA](#) area of Carver County, and see no restrictions being upheld by any MDA oversight for 'groundwater protection'.

Most producers the program targets already receive USDA/FSA subsidies. State ag grants are at an all-time high. This very program's existence relies on Clean Water Funds which cost taxpayers **\$54M+** to date. [Agricultural parcels pay the least amount of property taxes of any zoned land use in MN and have additional tax deferment programs.](#) I know, I own two. Taxpayers also currently [pay to clean up and mitigate ag pollution](#) issues through no fault of their own. What if you couldn't drink your well water? Who is responsible?

Without utilizing agency reports on agricultural pollution or water impairments, the only statistics this program delivers are estimations from the program's certification tool. **The tool provides statistics, not measurements or accountability required by the Clean Water Fund. Our agencies have reported regions of MN with high nitrates and agricultural chemicals in surface water and groundwater for decades.**

The program claims to 'remove' agricultural pollution risks to water quality are unsubstantiated. **NRCS-MN stated it next to impossible to make 'guarantees' to a specific water quality outcome due a multitude of factors:** soil types, depth to bedrock, weather, floods/droughts, climate projections, producer education, familiarity, equipment, drainage, irrigation, consistency of practice, etc.

Your opposition to this bill will keep conversation honest that degraded water quality from agricultural sources needs more help than just the MAWQCP program existing, and that **measurable, accountable clean water outcomes** are what we all need. Tax breaks only for having the title of this program on agricultural lands still producing pollution do nothing for producers, or Minnesotans who rely on clean drinking water. I thank you for voting to oppose.

Sincerely,

Lori D. Cox, Owner - Roots Return Heritage Farm LLC

2016 MAWQCP certified farm using no synthetic nitrogen, pesticides, or animal manure; continual no-till cover crops, fallow field; perennial fruits and rotated annuals on highly erodible soils.