From: Rodney Jorgenson
To: Gunderson, Larry (MDA)
Subject: Nitrogen Fertilizer Rule Comments
Date: Thursday, August 24, 2017 9:40:04 PM

Dear Supervisor Gunderson,

As a farmer, I am writing to express concerns with the Minnesota Department of Agriculture's proposed nitrogen fertilizer rule. Water is important to me and my family, however, there are concerns that need to be addressed in this proposed rule.

The Department of Agriculture needs to conduct more thorough research before nitrogen limitations are put into place. Instead of a rule, the Department should support outreach and education efforts to further the adoption of improved nitrogen management practices. Research focus should be on the most up-to-date best management practices, timed applications of nitrogen fertilizer, and usage of precision agriculture technology.

Water quality is a top priority for Minnesota farmers and ranchers. However, I urge the Department to do away with the first part of the proposed rule and instead focus on helping farmers implement best management practices that work on each farm, rather than another one-size fits all approach. We should have learned this from the buffer law, where there were obvious instances where buffers would have little to no impact on stream/river water, yet the law did little to consider the circumstances of that particular watershed.

Groundwater nitrogen comes from many sources, and limiting N applications is no guarantee that well N levels will go down. I've used U of M Nitrogen guidelines for years, when Gyles Randall, Soil Scientist with the U of M Waseca Outreach Center did research on my farm, along with other farms in southern Minnesota. We found that less than 100 pounds of actual N often yielded the highest economic return. Even so, N levels in our water have been on the high side. We get along fine with a reverse osmosis system to treat drinking water.

I wonder how the Department will measure the effectiveness of the proposed restrictions it plans to put into place, and what happens if those restrictions have little to no impact on reducing nitrogen in ground water. If we're serious about clean water, we need to make sure regulations put into place have actual results, and if they don't, they shouldn't stand.

Sincerely,

Rodney Jorgenson
27100 625th St
Kasson, MN 55944
rodj99@aol.com