From: MDA.Info@state.mn.us
To: Gunderson, Larry (MDA)
Cc: Wolf, Katie (MDA)
Subject: Draft Nitrogen Fertilizer Rule Comment
Date: Friday, August 25, 2017 9:20:50 AM

The following information has been submitted through the Draft Nitrogen Fertilizer Rule Comment Form.

Name: Richard Syverson
Organization: Syverson Family Farms
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Comment: As a farmer who operates in one of the vulnerable areas as described by this rule, I have major concerns about it. I utilize the services of a crop consultant and we together put together a fertilizer plan that provides adequate nutrients for my crops and protects the environment. We have grid sampled the entire farm and apply all fertilizer on a variable rate, as needed basis. There have been no instances to my knowledge of any wells in my area exceeding any of the limits in the rule. I believe the imppication of that is that I, and my neighbors, are already being good stewards of fertilizer products and any restriction that takes management of those products out of our hands is counter productive for water quality. Specifically, I have an issue with the 20 pound limit on DAP and Map and fall application. As these products contain N in the ammonioum form, they are unlikely to cause any problem with leaching over the winter. I agree that they should not be applied on frozen ground, but that is unheard of in my area. Perhaps the rule could be improved by removing that restriction on fall applications and retaining it for frozen ground. I am concerned that this rule will spend many state resources trying to regulate farmers in areas that do not have groundwater N problems instead of focusing on the areas of the state where we truly do have nitrogen in groundwater that can be actually linked to fertilizer applications. This rule seems to be an issue of using the wrong tool for the job, something like a hunter going to the field with a shotgun when a rifle is needed. Respectfully, Richard Syverson