From: Roots Return Heritage Farm
To: Gunderson, Larry (MDA)
Subject: Re: Draft Nitrogen Fertilizer Rule comments
Date: Wednesday, August 02, 2017 8:36:39 AM

Thank you Larry. Below is what I was trying to submit in the box on your site...

Hello, please consider incorporating the following into your rule. I also have comments at the end if you would please consider in order to get any improvements in at the farm level:

(2.18-2.19) How does anyone get to the heart of who the responsible party is, when so many acres are rented? Where is the written agreements that discuss the renting of land across MN? Is the state really going to track them down, and how will this rule enforce/ensure responsible parties are identified. Please confirm this with further language.
(5.18-5.23) Why are you allowing ~320 acres worth of vulnerable land, or any land for that matter to have fall application of any direct and excess nitrogen? Why aren't you enticing alternative practices (BMP's) for fall applications of covers, or other naturally-derived materials that don't cause a concern to Minnesota's groundwater, and while they enrich the very soil they're trying to grow on?
(8.19-8.22) what kind of agricultural emergency dictates anyone, anywhere should further pollute water in order to get nitrogen on their field? Isn't that what agriculture insurance programs and subsidy payments are for? This should be changed and not included; period. There is no emergency allowance to pollute water, and don't bow to those who say there is. In the fall there is an emergency? Really?
(9.1-9.22) Why are you waiting for 9 yrs to determine that any township is losing the battle with nitrogen issues and needs to 'have mitigation level raised'? They would all be in trouble already, and corrective actions including fines should have already been implemented. Giving people 9 yrs to comply with something that you say is dire, is ridiculous. We must not have a problem.

I really can't believe only wells are being tested. Why aren't above ground sources being tested with MN PCA, along with this rule and where they're designating 'vulnerable sites'? They've been tracking those for years, and today I can read on a map where they say waters are in danger, from nitrogen & phosphorus run-off. Water is water; it travels in the ditches, streams, rivers and lakes and also infiltrates into ground water. The fact that this rule is so short-sighted is the reason it will do nothing to protect any groundwater in MN, and hence the Governor may be trying, but it appears oversight is going to be very lax, as are most things in MN. We need tougher, stricter measures in order for the needle to move anywhere near the positive.

There needs to be much tighter reins put on pollution, polluters and the excessive use of nitrogen that harms our drinking and recreation supply; period. I fear all the work you've put into this will fall short, and for that I'm sad that state agencies continually succumb to the loudest farmer out there getting paid weather all that crop comes in or not, and doesn't instead listen to the whole population, knowing he/she has skin in the game. Everyone who's a drinker or user of water needs to do their part. Gov Dayton will not get his wish of 25% better water quality by 2025 with this, among other very lax rules. This is the reason we got to where we are, and tougher measures are indeed needed.

Provide incentive with cover crops or start pushing enrolling acres into CRP; there's dozens of programs out there at the local, state and federal levels that will pay farmers sometimes at or above their per acre prices they get at the end of the year. If the land and subsequent crop needs so much nitrogen, why doesn't the farmer/agronomist realize this and take it out of production? The land at that point is telling you something. Incentives/$ is the object here when you don't have all folks caring about the very environment they live in. There are no exceptions anymore for anybody; everyone is accountable, and water doesn't care where our parcel boundary or waterway designations are. Farmers have a lot of accountability for this issue, as does everyone else. No more loose rules please and start fining those who misuse, and don't care about the environment around them. Just how bad does it all have to get? At 40% unusable lakes, don't you think its time?

Thank you.

Lori D. Cox, Owner/Operator
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Carver, MN 55315
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or find us on Shopify, MN Grown, Agrilicious, LocalHarvest.org
MN Ag Water Quality Certified Farm
NFU/NACD Soil Health Champion Network Farm

On Wed, Aug 2, 2017 at 8:22 AM, Gunderson, Larry (MDA) <larry.gunderson@state.mn.us> wrote:

> Hi Lori, I'm not sure why you are receiving the error. Go ahead and email your comments directly to me. You can just reply to this email.
>
> Larry
>
> Larry Gunderson, Supervisor
>
> Fertilizer Technical Unit
>
> Minnesota Department of Agriculture

625 Robert Street North

St. Paul, Minnesota 55155

651-201-6168

Larry.Gunderson@state.mn.us

From: Roots Return Heritage Farm [mailto:rootsreturn@gmail.com]
Sent: Tuesday, August 01, 2017 2:26 PM
To: Gunderson, Larry (MDA) <larry.gunderson@state.mn.us>
Subject: Draft Nitrogen Fertilizer Rule comments

Hello Larry,

I'm getting the following error, but no red underlines, no nothing to indicate where the problem might be...can you help me on the site? I don't know what this error means. I've indicated comments stating specifically even what the numbered lines are in your draft rule.

The comment field contains content that may present a security risk. Please enter appropriate information

Thank you,

Lori D. Cox, Owner/Operator

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