From:	Montgomery, Bruce (MDA)
To:	Wolf, Katie (MDA); Berg, Jeffrey (MDA)
Cc:	Gunderson, Larry (MDA)
Subject:	Forwarded Comments: #2
Date:	Monday, August 14, 2017 7:44:02 AM

From: Shawn Feikema [mailto:shawn@feikemafarms.com]
Sent: Friday, August 11, 2017 5:58 PM
To: Gunderson, Larry (MDA) <larry.gunderson@state.mn.us>
Subject: Proposed fall nitrogen rule

Larry

This is Shawn Feikema from Luverne MN. My family has farmed in the far southwest corner for nearly 70 years. We have been doing the best job we can in managing our land so that we can not only be economically sustainable but also environmentally sustainable. I have been following the rule process for the vulnerable ground water areas and have some comments.

A few concerns I have with the proposed rule are as follows:

- The current maps that you are using may not be all that accurate. We farm some fields where there is bedrock beneath the surface. We have had it several times where a well driller thinks they know how deep the rock is, based on a map they have. When they drill they find that the maps are off by as much as 30 -40 feet. The maps that get used for this rule must be accurate due to the affect it will have on the farmer.
- The rule needs to have a way for certain areas to be removed from the vulnerable list if proven that there is little to no risk of nitrogen loss into ground water.
- I believe that we need to know what the baseline should be in our ground water before enforcing new rules with no actual goal in mind. As an example, we drilled a well in the early 1960's which was before much use of any nitrogen fertilizers. When the well was drilled then it was high in nitrates. The test levels have not change in nearly 60 years. For the rule to assume that the nitrates in the water are coming from fall nitrogen may be stretch at best.
- This rule makes the assumption that fall application of nitrogen is the problem and that eliminating it will be the solution. I have not seen any science that has shown a dramatic decrease in nitrates in ground water due to the absence of fall nitrogen application.
- If we are to have "local advisory teams" we need to make sure they are FROM the local area not FOR the local area.
- Need to define the timeline of application to something better than "Fall". That can mean different days on the calendar to different people.
- In the BMP there is no provision for the "good actors" if the "bad actors" cause a township to be put in level 3 or 4
- The rule should use science from more than just the University of MN

In summary I think there needs to be much more attention given to this proposed rule in many ways. This rule could have a detrimental effect on agriculture going forward without the proper science to back it up. In 20 years we could find that we have had no effect on our ground water but have increased the cost of production for farmers. Farmers are trying to do what is best and I think

that have some best management practices and using a voluntary system of some sort to do more studies in the areas that have been identified before making a rule we regret.

Thank you for your time and work on this issue, feel free to contact me in the future.

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