From:	Smallgrains.org
To:	Gunderson, Larry (MDA)
Subject:	Comments on Fertilizer Rule
Date:	Thursday, August 17, 2017 4:36:36 PM

Larry Gunderson
Pesticide and Fertilizer Management Division
Minnesota Department of Agriculture
625 Roberts Street North
St. Paul, MN 55155-2538

Dear Mr. Gunderson,

Thank you for the opportunity to comment on the draft Nitrogen Fertilizer Rule.

I do not think a one-size-fits-all strategy is the best approach to maintaining or improving groundwater in a state as large and diverse as Minnesota. Instead of prohibiting fall nitrogen applications across the entire state based solely on soil type, you should take into account the many factors that reduce the risk of nitrate leaching in the different parts of the state, including northern and western Minnesota. You should take a regional approach and work with growers and other local experts to identify the best strategies, for each region, before regulating nitrogen applications as proposed in Part 1 of the rule.

By prohibiting fall applications of nitrogen in such a large area of Northwest Minnesota, you would be creating a major problem because we do not have the infrastructure, at supply companies and individual farms, to apply and incorporate all the acres in a very short application window in the spring. (Infrastructure includes: people, equipment, storage capacity and large distances between fields and to the fertilizer source-Mississippi River) There could be unintended consequences because P and K may be incorporated in the fall and N in the spring, causing more tillage and possible erosion in some situations. It would also raise the cost of production.

Nitrogen is expensive and I am doing whatever I can to keep it available for the crops that I grow. I use many different strategies to do this economically and I am always looking for additional ways. That is why research is so important.

I am not opposed to changing and adopting to new information or technology, however to make big changes, as proposed in Part 1, it would be good to know the changes are needed and will have a positive impact on our groundwater quality. I encourage you to seek out current well testing data and expand the monitoring of ground water in our area before regulating. I believe most of us are doing a good job of limiting nitrogen loss in order to keep it available for our crops to use. Research will help us do more.

Thank you for your willingness to listen and work with local and regional growers to find the best solutions. I understand you added additional listening sessions and extended the comment period in order to get additional input. I hope the input you are getting will encourage you to change Part 1 of the Rule so that regulation does not take place in regions that need additional testing and consideration of regional risk factors. I am willing to work with you and others to help identify regional factors that contribute significantly more or less risk. This along with testing should happen before the regulation in Part 1 takes place.

Sincerely,

Robert Proulx

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