Draft Nitrogen Fertilizer Rule Comment Form

Thank you for taking time to review the draft Nitrogen Fertilizer Rule (Rule). We appreciate your thoughts and suggestions, please use the comment form below. Submitted comments will be considered during the Rule revision. If you would like to receive updates during the rulemaking process please be sure to include an email address.

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

Name: Aaron Erickson
Organization: Farmer / Rock Co. MN
Email: ernie4047@gmail.com

Please provide your email if you would like to receive updates.

Zip Code: 56138
Comment: *

Submit
1) it appears to me that the vulnerable groundwater area in our operation is already being addressed by the buffer rule. another example of government overstepping their bounds on privately owned ground. the rules and regulations being forced upon us effect our bottom line in times that are already difficult to make a profit.
2) the area in section 23 martin township / rock co. appears to be largely in un-farmed or sparcely farmed ground (& probably larger than really necessary). this ground (if not being farmed) should not effect the entire section, or fields in the section.
3) Rock County is a large livestock producing county. in what i've read, i do not see manure applications being addressed. in most cases, manure must be applied in the fall. 20 units of N, would not be enough for manure applications.
4) we are already utilizing grid sampling and variable rate fertilizer applications. so, the N rate applied by MAP or DAP varies greatly throughout the field. the 20 lbs of N with MAP or DAP, even if done on a field average is unrealistic, since higher rates of N may be no where near the effected ground.
5) i've read that if less than 50% of the section has effected ground, that it must be manged on a per field basis. who determines the "field"? if there is 200 acres with 10 potentially vulnerable acres through the middle must the entire 200 be thrown out? we are considering being added to a manure management plan. if we loss the opportunity to apply manure on 200 acres, the livestock operator will likely look for different ground to apply the manure. again potentially negatively effecting our bottom line.
6) some of this ground was put into production around 2012, when a lot of idle ground was put back into production. i've inquired about getting the ground into CRP. i was told i was not eligible. if you truly do want to manage this ground, allow for enrollment into CRP regardless of cropping history rules.
7) as previously mentioned, we are variable rate applying P & K in the fall. we do not currently apply fall N. we are currently implementing split applied N early and late spring. most of our potentially vulnerable ground is not being farmed. we are being forced to widen buffer strips where necessary. i do feel we are already managing this issue. further forced government regulations should not be required.