Summary of Concerns for the Nitrogen Rule Throughout MN
8-23-17

1) Use of Ksat and the existing vulnerability may not represent reality, more evident in Red River Valley.
2) Using sections not appropriate-field by field preferred.
3) The proposed 20lb/N/A associated with Map/Dap is restrictive-not enough carry over
   Phosphorus for soybeans.
4) Concerns about increased regulations on manure applications.
5) Concerns about using private wells for monitoring purposes.
6) Testimony regarding the use of technology and sound N management practices.
7) Significant acres using precision ag/variable rate applications
8) Need to spread work load and risk between fall and spring.
9) Time/Labor restraints or shortages in spring.
10) Spring traffic and compaction
11) Additional exemptions for specialty crops (rice paddy, grass seed production)
12) Adequate storage
13) Spring product shortage
14) More floaters and trucks (smaller coop concerns)
15) High fertilizer cost
16) Enforcement and responsible parties if illegal applications are made

Other Notes

1) If your township becomes vulnerable, a local advisory team will be established
2) A non-response to a survey (ie – if you followed BMP or used a precision practice) is a no answer
   and is included in the total acres for the township.
3) Enforcement action will look like a pesticide complaint. Human endangerment increases cost of fine.

From Cannon Falls 55009