From: Darby Boe
To: Gunderson, Larry (MDA)
Subject: Draft Nitrogen Fertilizer Rule
Date: Thursday, August 24, 2017 4:00:24 PM

Dear Mr. Gunderson,

I am writing in regards to the Draft Nitrogen Fertilizer Rule that is being discussed recently. While I haven't been able to attend a meeting due to scheduled conflicts, I have read up on it and have discussed it with several of my customers and want to say that I am against this potential rule change. I am a loan officer in NW Minnesota and deal with farmers from Roseau MN to Warren MN and on into ND. One of my concerns would be that land in the proposed "Vulnerable Groundwater Areas" would become less valuable due to the increased restrictions on the land. People would likely be less interested in purchasing ground that limits when they can complete some of their fall work when compared to land just west of the area that is very similar in soil quality and has less restrictions. This could adversely impact a farmer's balance sheet and lending capacity and would have impacts on collateral values for the banks using land in this area as collateral.

If this rule would go in effect, we do not have the infrastructure to handle the increased amount of fertilizer storage that would be required. Fertilizer companies would also need to add equipment to get the fertilizer applied because they wouldn't be able to spread this out by applying a portion of the fertilizer needs in the fall. Our spring planting seasons are so "tight" the way it is and often times it seems we only have 7-10 days to put the crop in the ground and this rule would put more work into this small window. It could lead to less nitrogen being applied at appropriate times and therefore impacting production or it could add more cost (i.e. labor, machinery expense, etc.) to get the fertilizer on the ground. I am concerned that it could have a direct impact to the companies that supply the fertilizer as well as the farmer by increasing their costs and decreasing their efficiencies in an industry that already has very tight profit margins.

My last concern would be the fact that I deal with farm customers in both ND and MN and it seems that the regulations and taxes in MN are far more burdensome when compared to ND. Due to this fact I have several guys that have never had an interest in farming in ND because MN has always been their home but are now starting to look for ground to farm in ND. If this happens it could take money out of our local economies and move it to ND.

With all of this said, I have no issue with rules that will help ensure that we have clean drinking water for years to come but please do not do something that impacts our local economies when there is no evidence to show that we have a current nitrate problem in our drinking water in this part of the state.

Thank you for taking time to hear my objections to this rule. I have included my contact information below if you would like to follow up on this.

Sincerely,

Darby Boe

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