From: MDA.Info@state.mn.us
To: Gunderson, Larry (MDA)
Cc: Wolf, Katie (MDA)
Subject: Draft Nitrogen Fertilizer Rule Comment
Date: Friday, August 25, 2017 8:33:56 PM

The following information has been submitted through the Draft Nitrogen Fertilizer Rule Comment Form.

Name: Daniel Roberts
Organization:
Email: rober710@umn.edu
Zip Code: 56062
Comment: The proposed nitrogen fertilizer rule is a government overreach and is unlikely to do much, if anything, to improve nitrate levels in sensitive/vulnerable areas. It does not address other more important sources such as mineralization of soil organic matter. My primary concern is that this rule will be expanded during regulatory process to include banning organic nitrogen in the form of animal manure. Banning the application of animal manure after August 31 would be devastating to the livestock industry, which is an important economic driver in Minnesota. Nitrate tests from private wells do not necessarily correlate with nitrogen fertilizer use and therefore agency testing of private wells would be an inefficient use of resources. Nitrate testing should be done on properly constructed dedicated monitoring wells to trigger any regulatory process. The proposed rule does nothing to address nitrogen fertilizer applications in cities and municipalities.