From:	Gunderson, Larry (MDA)
To:	Berg, Jeffrey (MDA)
Cc:	Wolf, Katie (MDA)
Subject:	Fwd: Draft Nitrogen Fertilizer Rule
Date:	Tuesday, August 08, 2017 3:51:31 PM

Jeff, another comment on the rule.

Sent from my iPad

Begin forwarded message:

From: "CO-Warren, Chris Kolstoe" <Chris.Kolstoe@chsinc.com>
Date: August 8, 2017 at 12:49:49 PM CDT
To: "larry.gunderson@state.mn.us" <larry.gunderson@state.mn.us>
Subject: Draft Nitrogen Fertilizer Rule

Larry,

I have grown up in NW Minnesota on a farm which I currently farm with my dad and I am also sales Manager for CHS Ag Services with an agronomy degree working with 15 different locations throughout NW Minnesota. I believe that the draft Nitrogen rule in our part of the world is not needed as farmers are already doing their part to protect their Nitrogen investment and water quality. Farmers throughout the region are already managing where they can safely apply fall nitrogen right before freeze up and where they cannot. Farmers are also using technologies such as precision ag to place fertilizer and also nitrogen stabilizers to protect their investments as nobody wants to lose their nitrogen to leaching or valorization.

As I look at the map of where the state is saying no fall N application, I was zooming into land that my dad and I farm and through my own knowledge of the land I would say the map is inaccurate as it shows some land we could apply fall N to that I would say is more susceptible to N leaching then to some land that is in the no N application zone. It appears that the map is based mostly on just topsoil and not considering the heavy clays we have below.

As a retailer I also know firsthand the impact this rule will have on farmers if this rule is implemented as logistics, infrastructure, people and equipment are already pushed to the limit in the spring. Farmers need to be able to continue using BMP's on the land that they know to correctly manage their land.

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