From: Becher, Douglas (DD)
To: Gunderson, Larry (MDA)
Cc: Bill Bond
Subject: Draft Nitrogen Fertilizer Rule - Comment
Date: Monday, July 31, 2017 7:15:06 AM

Larry,

After attending the public hearing and comment session that was held in St. Paul I do have a couple comments which I also voiced at the meeting. First, the 20# N limitation through dry fertilizer applications is going to be tough to monitor an implement especially with growers that are utilizing variable rate technology. The recs being made for variable rate applications are constructed using the most recent soil sample results and this may detour growers from utilizing this environmentally sound practice for Phosphate applications. Second, is the restriction of N applications to soils that have reach 32 degrees F. With fall application of anhydrous in particular there are many situations where the ground surface may have a slight crust on top but the application can still be done with good coverage and flow of soil behind the knife. Limiting the back end of the application window will force growers and applicators to start earlier creating situations where N conversions in warmer soils might be an issue.

Please, consider eliminating or revising these restrictive rules from the draft.

Thanks,

Doug

MCPR Board Member

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