From: MDA.Info@state.mn.us
To: Gunderson, Larry (MDA)
Cc: Wolf, Katie (MDA)
Subject: Draft Nitrogen Fertilizer Rule Comment
Date: Thursday, August 17, 2017 7:23:39 PM

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

Name: Dan Bradow
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Comment: As a Farmer, I take my responsibility to insure that ALL of my farming practices are done in a safe and economical way. The new Nitrogen Fertilizer Rule that is being developed would be a severe and unnecessary enforcement in my area of Otter Tail and Wilkin counties. The soil types in my local area are very heavy and I have never seen an instance of where I could see leaching of Nitrogen away from my growing crops. The Cation Exchange Capacity is quite high in this area and the general rule has been taking a CEC and multiply by 10 and that is what your ground can hold for nitrogen before losing it to leaching. My farms range between 15 and 30 CEC. My practice has been to apply about 46% of my Nitrogen needs (approximately 90# of Nitrogen) in the fall when soil temperatures fall below 50 degrees. I then apply the rest of my needs in the spring/summer as sidedress applications. By applying in the fall, it helps reduce my work load. It also reduces the compaction across my fields as it tends to be dryer soil conditions in the fall instead of wetter conditions in the spring. I also band my phosphorus, potassium, and sulfur in the fall. With your limit of 20# of Nitrogen I would not be able to accomplish this fall application and the rates I need to raise a crop. By banding my fertilizer, I'm able to reduce my fertilizer needs by 30% versus applying broadcast. I would not be able to get my fertilizer banded in spring due to the lack of time available in this northern climate. I understand that there are areas in Minnesota that need ground water protection and there are some soils that Nitrogen can leach quite easily, but this proposal which seems to be done in a broad brush stroke is not the answer. In my corner of SW Otter Tail county and into Wilkin county the loss of fall nitrogen usage on OUR land is unacceptable. This nitrogen rule will have a severe economic impact on how farmers get fertilizer out to the crops. More equipment would have to be purchased, more expensive liquid fertilizers would have to be used at higher usage rates which would also include higher fuel usage across all of our farms. I strongly encourage you to delay this implementation and open up more dialog to develop a better plan.