From: MDA.Info@state.mn.us
To: Gunderson, Larry (MDA)
Cc: Wolf, Katie (MDA)
Subject: Draft Nitrogen Fertilizer Rule Comment
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The following information has been submitted through the Draft Nitrogen Fertilizer Rule Comment Form.

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Comment: Describe how both parts 1 and 2 of the rule will impact your farm. • Does the depiction of “vulnerable groundwater areas” seem reasonable for your farm given your knowledge of the soils and quality of drinking water in the area? Specific soil properties are always good in determining nutrient managment systems • If your farm is located within a vulnerable area as identified in part 1, and if wells in your township have been tested and are not above the 10 ppm limit, are existing farming practices already protecting groundwater? Likely due to the fact the well is a "good" well to start with. Along with that modern day (sustainable) practices are still used to characterize soil health, nutrient timing, and nutrient rates. Growers can evaluate ROI (inputs/productivity) by the acre if they choose. No grower I know is willing and able to over apply nutrients. • Should the allowance of up to 20 pounds of nitrogen associated with MAP or DAP applications of phospho rus be removed if soil tests are being used to determine phosphorus appliction rates? Nitrogen associated with the MAP/DAP should not be restricted. Use rates unlikely to be over 20 lbs anyway on these proposded soils. • If you are in an area that could be affected by part 2 of the rule, are there precision agriculture technologies you are using for nitrogen applications that need to be considered in the development of mitigation strategies? Yes - precision ag is the backbone of critical information for making better decisions. • If you are in an area that could be affected by part 2 of the rule, describe the importance of the role of the local advisory team in the mitigation process and the expertise that resides within your community to participate on this team.... local agronomist are fully capable of ground-truthing soil type and nutrient soil test levels to establish a crop plan. N-use efficiency has nearly doubled over the past 30 years - that never gets brought up. As precision ag has evolved, nutrient use efficiency and ROI are tracked. if there is an opportunity for a grower to reduce inputs (fertilizer applied) where productivity is limited - they either have. Have not met a grower than can afford to over apply product without a return in productivity (use/uptake). So yes, too many misconceptions that producers over apply simply due the fact the public does not understand the investment growers have made (Proactively) to make make responsible decisions. Develop management sytems that are efficient, sustainable, and profitable are based on economics driven by fundamental agronomics. Using well testing sites as a basis to point fingers and scrutinze the ag industry appears off target.