From: Gunderson, Larry (MDA)
To: Wolf, Katie (MDA)
Subject: FW: nitrogen fertilizer rule
Date: Wednesday, June 14, 2017 9:54:47 AM

Another comment

Larry Gunderson, Supervisor
Fertilizer Technical Unit
Minnesota Department of Agriculture
625 Robert Street North
St. Paul, Minnesota 55155
651-201-6168
Larry.Gunderson@state.mn.us

From: Eric Wright [mailto:ewright@countryprideservices.com]
Sent: Monday, June 12, 2017 4:33 PM
To: Gunderson, Larry (MDA) <larry.gunderson@state.mn.us>
Subject: nitrogen fertilizer rule

Larry,

I have read the draft proposal on the "Nitrogen Fertilizer Rule". It seems as though it is aimed at commercial fertilizer applications only. Nowhere in the draft are "Manure" applications even mentioned in the rule. I work in the retail fertilizer industry and have been for 24 years. I have seen a lot of changes in that time with fertilizer programs and applications. One of them is "Variable Rate Application". This program is totally based on a grid sample format of the soil mainly to be more efficient with the fertilizer usage in the field. We are a dealer that currently uses DAP for our P source. As you know DAP also has N in it as well. As the rate increases so does the N. We also variable rate the N source with a stabilizer, be it 32% UAN, NH3, or Urea, either in the fall or in the spring depending on the farm. This is so the rate of N is consistent throughout the field so as not to over apply the N as well as provide protection to their investment. Our customers find this very cost effective as well as beneficial to the environment. Manure applications on the other hand do not do this. While their rates per acre are limited what time of year are they doing this operation? Mostly starting in late August after small grain harvest in to September starting on early soybean harvest, finishing up in late October, maybe November. Why is this allowed to happen? Soil temps at this time of year are above the text book 50 degree maximum requirement for N applications when conversion from Ammonium to Nitrate occurs. I understand their reasoning for doing this, however, it has nothing to do with Nitrogen application, usage, or the environment. It has totally to do with the operation of the livestock and the disposal of the manure that has been generated to make more room for it. There are other areas that are never mentioned in this proposed regulation that include urban runoff as well.

I believe that the state of Minnesota has a problem with our groundwater and drinking water supplies. I also believe that this proposal will not change the outcome as it currently stands solely based on what I have explained above.

Respectfully,

Eric Wright
Agronomy Manager
Country Pride Services Cooperative
Bingham Lake, MN