From: Jeff Sorenson
To: Gunderson, Larry (MDA)
Subject: Nitrogen Rule
Date: Friday, August 25, 2017 11:45:09 PM
Attachments: image001.png

Larry,

I am very concerned with the proposed Nitrogen Rule. I am an Agronomist with Legend Seeds and in this role I work with hundreds of growers on Management plans including fertilizer plans, I am also very closely tied to my family farm by Morgan.

Some of the issues that I have with this plan are:

I use to work at a local coop and the main reasons that we applied fertilizer, Nitrogen included, in the fall was because we simply couldn't apply enough acres in the spring. Most of the corn in MN is planted in about a 7 day time frame, verses in the fall the Retailers apply fertilizer for about 6 weeks, or in other words these places would not only have to buy 6 times as much equipment they will also have to find 6 times as many employees, which already is a challenge to find enough help at that time of year. Fertilizer is also applied in the fall to help reduce compaction in the spring of the year, so now if we are applying fertilizer in the spring and compacting the soil we will now have more run off and in my opinion have more water quality issues.

Another big aspect that is being overlooked in this all is that when we apply Fertilizer in the fall the soil temperature is either below 50 degrees or we apply a nitrogen stabilizer, so the amount of fertilizer that converts to the Nitrate form before spring applied fertilizers is very little. I have actually taken Nitrogen tests in the spring for a number of years and each time I find no difference in Nitrate levels between areas that had fall applied fertilizer and areas that had no fertilizer applied yet. Almost all of the Nitrogen is still in the Ammonium form and has not converted to the Nitrate form yet . But the interesting thing when I started doing these Nitrogen soil test was that there was a lot of Nitrate Nitrogen in the soil where there was no fertilizer applied because Soybeans produce their own Nitrogen(to the tune of 600#) so even though we can't control this there is actually more leaching potential in a Soybean or Alfalfa field than there is in a Corn field.

The final part of this rule that needs to be addressed is that if there is going to be an exemption for Nitrogen from Phosphorus fertilizer this amount needs to be higher than 20#. Because when I make Variable rate recommendations based of U of M Rates for just making up for crop removal my average Nitrogen that I get from just DAP is about 50#of Nitrogen. And it works best to put a little Urea with that to make a flat 50# so in the spring we have an even amount of Nitrogen and we don't have to variable rate in the spring also. I think there should be a higher average amount that can be applied in the fall. Also even though right now the recommendations call for about 250# of DAP as our yields keep increasing the amount of crop removal of increases so we will need to be applying even more DAP just to keep nutrient levels where they are.

And I think that at the end of the day farmers put a lot of science into how and why they apply the fertilizer that they do because they can't afford to waste any fertilizer, this is why there is so much that is Grid sampled and Variable Rate applied right now. And I truly believe that farmers are the ones that are most effected by any Nitrate leaching because if it truly is coming from these fields then our wells are the ones most effected and thus we for sure want to be applying the right fertilizer's.

Thanks

Have Great Day

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