From: James Kukowski
To: Gunderson, Larry (MDA)
Subject: N Fertilizer Rule
Date: Friday, August 25, 2017 3:36:46 PM

Dear Fertilizer Technical Unit Supervisor Larry Gunderson,

I am writing in regards to the MDA proposed N Fertilizer Rule. I am asking that the rule be rewritten and consider the huge economic impact it will have on Minnesota's farm families.

First of all, the rule relies on faulty data collected from domestic wells. Well casings have many maintenance and construction issues that can lead to the well being compromised and showing levels of N higher than in the surrounding groundwater. The result is that farm families are considered guilty before the actual source of the N is determined. The MDA should only use test results from properly constructed monitoring wells.

Secondly, the application of the rule may have devastating economic effects on farm families. Farmers are already careful about the rate of N used on their fields. This is an expensive input that is vital for a good harvest. We do not want to waste N or pollute groundwater. In many areas there is not proper infrastructure to get N to farmers in the fall. Fall road restrictions could make fertilizers unavailable and spell doom for farm families. In addition, there is not adequate manpower and machinery to get all the fields fertilized in the spring. These challenges and the economic impact on farm families and rural economies has not been looked at or considered at all in this rule.

Finally, the rule's use of townships is too broad. Each field acts differently than the next. Looking at soils and the conservation practices on a field level should be a part of the rule before any restriction is put on the use of N fertilizer.

Please take the time to look into these issues and rewrite the rule in a way that will treat farm families fairly. The rule should look at the true source of N and the true levels of N and be built upon sound science.

Regards,
James Kukowski
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