August 22, 2017

Larry Gunderson
Pesticide and Fertilizer Management Division
Minnesota Department of Agriculture
625 Robert Street North
St. Paul, MN 55155

Dear Mr. Gunderson,

On behalf of the Minnesota Farm Bureau Federation (MFBF), thank you for the opportunity to provide comments on the draft nitrogen fertilizer rule. MFBF represents nearly 30,000 farm families and is organized in 78 counties across Minnesota.

MFBF believes the Minnesota Department of Agriculture needs to conduct more thorough research before nitrogen limitations are put into place. Instead of a rule, the Department should support outreach and education efforts to further the adoption of improved nitrogen management practices. Research focus should be on the most up-to-date best management practices, timed applications of nitrogen fertilizer, and usage or precision agriculture technology.

MFBF has strong concerns over the determination of soils classified as vulnerable based solely of the soil type without adequate and consistent data of the ground water below. In areas where more than 50% of a section is deemed vulnerable, more in-depth research needs to be conducted before the entire section of classified as vulnerable. MDA water monitoring data shows that areas with elevated nitrate levels are significantly smaller than the areas defined as vulnerable and therefore MFBF believes that efforts should focus on more localized areas.

In areas where elevated nitrate levels have been determined, MFBF believes the Department should investigate to ensure that elevated nitrate levels are actually the result of current nitrogen fertilizer practices, not due to other nitrogen sources or from fertilizer practices of past generations.

In summary, water quality is a top priority for Minnesota Farm Bureau Federation and its members. However, MFBF urges the Department to do away with the first part of the proposed rule and instead focus on helping farmers implement best management practices that work on each farm, rather than a one-size fits all approach.

Sincerely,

Kevin Paap
President

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