October 31, 2013

Annie Felix-Gerth
Pesticide and Fertilizer Management Division
Minnesota Department of Agriculture
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RE: Comments on the draft 2013 Nitrogen Fertilizer Management Plan.

As an independent crop consultant, I realize that our firm could potentially profit from the increased services that would be needed by farmers due to increased regulations imposed by the 2013 Nitrogen Fertilizer Management Plan. However, I believe that the overall impacts of this plan would be over-reaching and harmful to MN farmers.

Our consulting firm works with over 50,000 acres of cropland in central MN. Farmers hire us to provide independent advice, information, and technology to assist them in making more timely and informed decisions based on sound science. Farmers willingly hire us because they want to be profitable, but they also want to be good stewards of the land.

Regarding nitrogen management, we spend thousands of dollars every year on lab fees for soil nitrate testing and plant tissue testing to help our growers dial in their nutrients more efficiently. We've even spent over $10,000 this year on a new soil nitrate machine so we can adjust nitrogen fertilizer recommendations within minutes or hours instead of days. Farmers and people in our industry can give you countless examples of how we as an industry are investing in new methods and technology to be more efficient and productive with our crop nutrients.

It is frustrating to read the Revised Nitrogen Fertilizer Plan and find out that these kinds of practices are not addressed. Rather, it seems, MDA wants to indict agriculture based on the testing of private wells.

Sincerely,

Paul M. Anez
Anez Consulting, LLC