October 3l, 2013

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RE: Comments on the draft 2013 Nitrogen Fertilizer Management Plan

How much more time and resources will the MDA spend going down a wrong road that will lead only to public concern and fear and an inaccurate perception of water quality issues in Minnesota?

The Draft 2013 Nitrogen Fertilizer Management Plan is a lengthy document that, in the end, has not provided any documented proof that the agricultural use of commercial nitrogen is the source of high nitrate levels in private residential wells. It appears the MDA has used non-verified data to support their position. Many farmers are afraid to comment on the Plan because of fear of any repercussions that could come their way from becoming actively involved in this process. Others who attended the Public Listening Sessions felt hopeless in responding as it appears the MDA is very determined to move forward with this plan regardless of any input you are given.

It is my understanding that in 1990, a similar process and plan was constructed to address this issue of nitrogen management. At that time, there was greater input from the ag community. In comparison, the 2013 NFMP advisory committee had minimal true ag representation, ie: a producer not serving on some commodity organization board. The 1990 plan is still relevant and usable. The presenters from the MDA at the Public Listening Session could not help themselves from repeatedly saying how this study is possible because of the Clean Water Legacy Act funding. It must be tiring looking for a way to link contaminated wells to agricultural activity when you have no solid proof. Is this a good use of taxpayers' dollars? The wells that are experiencing high nitrates need to be evaluated to rule out site specific problems. If you have a real genuine concern for these families and individuals, your plan would include purchasing and distributing reverse osmosis systems for their homes.

Looking back to the June 2012 issue of the MDA Update, page 6 headline reads "Good News for Central Sands Well Owners". The article states that over 88% of the wells sampled had nitrate-nitrogen concentrations less than 3mg/L; only 5% exceeded the safe drinking water guideline of 10mg/L. The article goes on to say that "it is important to note that the older and/or shallower wells tended to have a higher percentage at unsafe nitrate-nitrogen concentrations." We question how less than a year later the MDA is spending time and resources and calling this an immediate threat to public health?

The presenters at the meetings/listening sessions that my wife and I attended were so unaware of many of the conservation and fertilizer management practices already being used by producers. The

technological advances that continue to be made in the agricultural industry utilize less water, less commericial fertilizers, and fewer passes over the land. Farmers have, for many years, been actively seeking and implementing better practices. Look around--- we are not farming like we did 20 years ago. Or in most cases not even like we did 5 years ago.

How can the MDA, in good consciousness, propose a plan that you, yourselves, have said that the recorded history is somewhat foggy and that the effects of nitrogen-nitrates in well water doesn't sometimes show up until about 20 or more years later? Has your plan been verified by a third-party non-government agency? How can you establish regulations when you don't fully understand the effects of what farmers are currently doing? According to what you have said, you may not know these effects until 20 years from now. We do know that farmers are using nitrogen in more efficient ways. One presenter was amazed to hear that as a producer, I use variable-rate nitrogen applications. This allows the nitrogen to be used most efficiently when the plant needs it and can utilize it. The use of cover crops has been common practice on our farm for over 30 years. Most farmers are excellent stewards of the land and to imply that we need the NFMP to keep us "in-line" is an insult. After clean air and water, people need food. Farmers are growing more food with fewer resources than ever. What economic hardships are you willing to put on farmers just to follow a plan that likely will not have a significant change in the nitrate-nitrogen levels of private wells? What happens after you have spent all the Clean Water funds, made farmers make unreasonable changes to their operations, and the public sees no positive change in their water quality? What will this do to the credibility of the MDA?

Your plan calls for phases. But why does it not call for trial segments that could test the validity of this plan?

This only skims the concerns I have with this Draft 2013 NFMP. In the best interest of the people of Minnesota, I strongly support the MDA to reconsider this proposed plan and to actively engage a greater number of producers from across the state for future input.

Sincerely

Duane J. Kroll
Producer from Morrison County