From:	Rick L. Gilbertson
To:	Gunderson, Larry (MDA)
Subject:	Comments on Proposed Rule on Nitrogen Fertilizer Use
Date:	Friday, January 29, 2016 5:00:20 PM
Attachments:	MNICCA Comments on Proposed Nitrogen Fertilizer Use Rule.docx

---

Larry:

Please see the attached document.

Thanks,

Rick Gilbertson
President, MNICCA

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

Mr. Gunderson:

I am commenting on the "Proposed Rule on Nitrogen Fertilizer Use" as put forward by the Minnesota Department of Agriculture. As the current President of the Minnesota Independent Crop Consultants Association (MNICCA), my comments reflect concerns and questions shared by members of the association through personal communication with me.

By far, the largest concern regards the use of private wells in groundwater vulnerable areas as the triggering mechanism to monitor groundwater quality. Age of these private wells, the quality of the individual well construction and proper grouting of these private wells as required by the Minnesota Water Well Construction Code are all suspect in this dataset. A better use of the "Township Testing Program" of private wells may be to educate private well owners on proper well construction and possibly financial assistance in remediating poorly maintained or constructed individual wells. The overwhelming recommendation of MNICCA members is to only use dedicated groundwater monitoring wells, properly sited, as the basis for monitoring groundwater nitrate contamination and the need for nitrogen fertilizer restrictions.

I appreciate the opportunity to voice our concerns, and look forward to continuing to share in the responsibility of striving to prevent or minimize the impacts of nitrogen fertilizer on groundwater.

Sincerely,

Rick Gilbertson
President, MNICCA