From:	Nels Paulsen
To:	Gunderson, Larry (MDA)
Subject:	Nitrogen Fertilizer Comment
Date:	Thursday, January 28, 2016 3:05:37 PM
Attachments:	Nitro Fertilizer Comment.pdf

Mr. Gunderson,

Please find a formal comment on the Proposed Rule Governing Nitrogen Fertilizer attached.

Thank you,

Nels

Nels Paulsen
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January 25, 2016

To: Mr. Larry Gunderson
larry.gunderson@state.mn.us
651-201-6168

RE: Proposed Rule Governing Nitrogen Fertilizer, Minnesota Rules, 1573; Revisor's ID Number R-04337

Greetings Mr. Gunderson,

I am writing to you on behalf of Conservation Minnesota. As an organization, we work to solve the conservation problems that are most important to Minnesotans.

We write regarding the Minnesota Department of Agriculture's proposed rule adopting mandatory requirements to prevent nitrate contamination in groundwater. While this proposed rule is an important step towards protecting Minnesota's drinking water, the proposed rule does not go far enough. Restricting fall and winter nitrogen fertilizer application is essential to preventing contaminated groundwater. However, this restriction only applies to the most vulnerable areas within the state. And further more, many farmers already restrict their use of nitrogen fertilizers in the fall and winter. The rule should consider requiring fertilizer limitations on additional lands to ensure that our water is better protected for safe human consumption.

Restricting nitrogen fertilizer use is only one means to safeguard drinking water - other options would create even more protection. A more extensive and comprehensive rule, requiring broader restrictions to even more areas of the state, would be a healthier option for Minnesotans. We appreciate the effort put into this proposed rule to improve water quality, but we believe the rule can go even further. Additional steps should be taken to protect Minnesota's precious water resources, and this proposed rule leaves some vulnerable water resources needing additional protections.

This proposed rule is on the right path to protecting drinking water for all Minnesotans. However, we ask that you continue to develop the rule to enhance those protections.

Thank you,

Nels Paulsen
Policy Manager
Conservation Minnesota