From:	Patrick Murray
To:	Gunderson, Larry (MDA)
Subject:	Cooperative Network comments to MDA"s Proposed Nitrogen Fertilizer Rule
Date:	Friday, January 29, 2016 5:13:25 PM
Attachments:	image001.png Cooperative Network Comments on Proposed Nitrogen Fertilizer Rule 1-29-16.pdf

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Hi Larry –

Attached please find Cooperative Network's comments to the proposed rule governing nitrogen fertilizer. Please feel free to let me know if you have any questions. Thanks and I hope all is well.

Patrick

PATRICK MURRAY | Director of Government & Member Relations
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Cooperative Network

The united voice for cooperatives in Minnesota and Wisconsin.

UPCOMING EVENTS

Co-op Communicators Workshop – Feb. 25-26
Co-ops Yes! Youth Leadership Conference – March 7-8
Minnesota Co-op Day at the Capitol – March 15

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January 29, 2016

Mr. Larry Gunderson
Minnesota Department of Agriculture
625 Robert Street North
St. Paul, MN 55155

Re: Comments on Proposed Rule Governing Nitrogen Fertilizer

Dear Mr. Gunderson:

Cooperative Network is an association of more than 400 cooperative businesses owned by residents of Wisconsin and Minnesota. Our diverse membership includes member-owned farm supply, financial, health care, mutual insurance, dairy marketing, processing, consumer, livestock marketing, communications, electric utility, housing, school district, and worker-owned cooperatives, among others. Thank you for the opportunity to comment on the Minnesota Department of Agriculture's (MDA) Proposed Rule Governing Nitrogen Fertilizer.

Comments regarding specific provisions in the proposed rule include:

- The proposed rule and associated Nitrogen Fertilizer Management Plan (NFMP) identifies areas of the state where groundwater is vulnerable to contamination (i.e., sandy soils or karst geology). Specifically, defining coarse textured soils based on Natural Resources Conservation Services classifications as dominated by sand and loamy sand is suggested. However, more accurate criteria reflecting the variability in groundwater vulnerability in the karst region is needed. Depth of topsoil is one variable that can support fall nitrogen application. We believe that MDA should focus the NFMP and proposed rule to these vulnerable areas (i.e., sandy soils or karst geology) and explicitly state all other areas are not subject to the proposed rule.

- Upon identification of priority areas, MDA should engage local stakeholders with knowledge of water conditions and farming practices. The local advisory teams should include farmers and agronomists with knowledge of local conditions.

- Notification of the proposed rule and subsequent priority areas should be sent to affected local units of government, farm organizations and local extension professionals. Cooperative Network participates in The Nitrogen Fertilizer Education and Promotion Team and sees its role as an opportunity to guide MDA efforts on the proposed rule.

- Finally, we would prefer that the rule reflect that commercial nitrogen fertilizer only be permitted on non-sandy soils after soil temperature has reached 50 degrees Fahrenheit or below, with the use of an approved inhibitor at recommended rates.

We plan continued engagement in on this process. It is critical to our agricultural cooperatives and their member-owners. Once again, we appreciate the opportunity to comment on this proposed rule, and we thank you in advance for your consideration of our comments.

Sincerely,

Matt Hughes
Minnesota Managing Director
Cooperative Network