From: Rod Sommerfield
To: Gunderson, Larry (MDA)
Subject: Comment on rule to stop Fall Nitrogen applications in Karst and sand areas
Date: Friday, November 27, 2015 4:44:35 PM

Mr. Gunderson

We believe the stopping of Fall Nitrogen applications in these areas is decades over due. When one considers that newborns are most at risk from Nitrates in drinking water, it is hard to believe anyone can find justification for continuing this practice. Our farm was talked into trying Fall anhydrous back in the mid-70's and we stopped after one year. We do Regenerative Agriculture having significantly increased our soil organic matter and grown the A Horizon by double from what it was when our soils were first cleared. We currently produce a bushel of corn with no more than .6 pounds of purchased Nitrogen and many times less. We also feel no one should be allowed to apply Nitrogen at rates greater than 10 times the soils CEC. We believe the main drivers of this misuse are the Custom fertilizer applicators who want to spread there equipment and labor over Fall and Spring. There are many of us who do all we can to be Good Stewards of the Environment it is not fair to us when the State allows BAD Stewards to always have their way.

Thank You!
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