From:	Dan Schmitz
To:	Gunderson, Larry (MDA)
Subject:	MDA N Rule
Date:	Friday, January 29, 2016 5:02:38 PM
Attachments:	MDA N Rule comment.pdf

Larry,

Please see attached.

Best regards,

Dan Schmitz

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Larry Gunderson
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RE: Comments on the proposed MDA Nitrogen Fertilizer Rule.

Thank you for considering my comments on the proposed MDA Nitrogen Fertilizer Rule. I have three main concerns with this rule.

1. The process for using domestic wells for determining if groundwater has been impacted by fertilizer nitrogen use is completely flawed. Domestic wells are subject to poor construction, unknown condition, and contamination from multiple sources that are unrelated to commercial agricultural use of nitrogen and are an unreliable indicator of ground water contamination from nitrogen fertilizer use. The MDA should research and consider the reasons why the state of Nebraska, which has documented high nitrate levels in groundwater, uses only dedicated monitoring wells for water quality monitoring of agricultural application and has completely rejected the use of both domestic and irrigation wells for monitoring nitrate in groundwater.

2. The prescribed nitrogen fertilizer use rates for corn developed by the U of M are far too narrow to have practical application for the wide and diverse soils, topography, climate, and management abilities of the Minnesota agricultural landscape. The nitrogen evaluation strips that the MDA implemented with multiple Minnesota farmers a few years ago shows this to absolutely be the case: Many of the locations showed optimum rates both above and below University BMP rates. I am amazed how often I am sitting in a university extension program meeting and the nitrogen rates used to achieve optimal production are well above what the “Nitrogen Use Calculator” would dictate for corn production in Minnesota.

3. The social costs have not been established. Minnesota farmers continue to raise the bar on nitrogen use efficiency. Farm yields continue to increase while nitrogen use in the state has remained relatively constant. To impose restrictions on their ability to economically and logistically produce a crop for a growing population would be a human injustice. We produce and sell millions of cars in this country every year knowing that a certain fraction of the population will die in automobile collisions, yet we continue the production; what are the documented deaths or illness from nitrate poisoning? I have not seen a single report of methemoglobinemia in Minnesota for the thirty years I have been in the Ag industry.

I believe this rule needs further careful scrutiny before implementation. The methods proposed for triggering nitrogen use restrictions are flawed. The nitrogen use rate restrictions proposed under the rule are too narrow. The social costs of this rule have not been adequately considered. I suggest a series of public hearings be held to gather further input from the citizens of Minnesota and the ag community.

Best Regards,

Dan Schmitz