

From: [Frey, Craig Joseph](#)
To: [Bartnick, Bill](#)
Subject: [External] comment on 5M-1 rule
Date: Friday, November 13, 2020 11:53:22 PM
Attachments: [Hendry Soil Sample Example.pdf](#)

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Hi Bill,
Can you please add the follow to the public comments for consideration?
Thanks,
Craig

When applicable (soil pH ≥ 7.4), current UF/IFAS soil lab results state the following (see attached for an example):

The soil has been determined to be calcareous in nature because of its pH (≥ 7.4). At this pH, AB-DTPA extraction method was found suitable. However, only Phosphorus(P) was calibrated. No calibration was possible for Potassium(K) and Magnesium(Mg). Therefore, the recommendations for K and Mg are provided solely for successful crop performance and yields. Nitrogen(N) recommendations are provided based on research data and not on a soil test. Research studies are underway at different locations in the state to identify an appropriate extraction method for improved interpretations and recommendations for these soils. At that time, the recommendations will be modified, as appropriate.

This is inconsistent with current BMP manuals, which state M-3 must be used. Additionally, while it states only P is calibrated with this extraction method, there are no published UF/IFAS fertilizer recommendations with this extraction method, including P.

Therefore, it is recommended that a temporary emergency order be included in the 5M-1 rule, in a location that seems most appropriate by FDACS OAWP, when the soil characteristics are described as above. This temporary emergency order should state that an Enrolled Producer does not need to implement corrective measures for phosphorous fertilization when soil pH is ≥ 7.4 until UF/IFAS provides an appropriate recommendation for the extraction method for these soil conditions as well as published fertilizer recommendations that are calibrated to crop yield response for this extraction method.

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