

Comment Register
Proposed Phosphorus Management Tool Regulation
November 11-14, 2013

No.	Source	Date Received	Form	Date Acknowledged	Form of Acknowledgement
241	Gordon Gladden	11/11/13	Petition	11/12/13	email to sender
242	Rich Stover	11/11/13	Petition	11/12/13	email to sender
243	Bill Cropper	11/11/13	Petition	11/12/13	email to sender
244	Terrance Greenwood	11/11/13	Petition	11/12/13	email to sender
245	Kurt Schuster	11/11/13	Petition	11/12/13	email to sender
246	L Wayne Reichard	11/11/13	Petition	11/12/13	email to sender
247	Ray ?	11/11/13	Petition	11/12/13	email to sender
248	David R. Oress	11/11/13	Petition	11/12/13	email to sender
249	R ?	11/11/13	Petition	11/12/13	email to sender
250	Richard S Barr, Sr	11/11/13	Petition	11/12/13	email to sender
251	David A MacLeod	11/11/13	Petition	11/12/13	email to sender
252	John Broyhill	11/11/13	Petition	11/12/13	email to sender
253	Woodrow E Vicky	11/11/13	Petition	11/12/13	email to sender
254	John Daugherty	11/11/13	Petition	11/12/13	email to sender
255	Charles Brenner	11/11/13	Petition	11/12/13	email to sender
256	Joseph Ivers	11/11/13	Petition	11/12/13	email to sender
257	F M ?	11/11/13	Petition	11/12/13	email to sender
258	Stu Leer	11/11/13	Petition	11/12/13	email to sender
259	Don Ewalt	11/11/13	Petition	11/12/13	email to sender
260	Jock McNair	11/11/13	Petition	11/12/13	email to sender
261	Chris Pelk	11/11/13	Petition	11/12/13	email to sender
262	Ruth Beauchamp	11/11/13	Petition	11/12/13	email to sender
263	Fred Wierman	11/11/13	Petition	11/12/13	email to sender
264	Mike Bloxham	11/11/13	Petition	11/12/13	email to sender
265	C H Whitmore	11/11/13	Petition	11/12/13	email to sender
266	W H Parker	11/11/13	Petition	11/12/13	email to sender
267	Ann S Parker	11/11/13	Petition	11/12/13	email to sender
268	Susan Satterfield	11/11/13	Petition	11/12/13	email to sender
269	Donald E Ewalt, Jr	11/11/13	Petition	11/12/13	email to sender
270	Richard Duncan	11/11/13	Petition	11/12/13	email to sender
271	Marvin Blye	11/11/13	Petition	11/12/13	email to sender
272	Ruth P Jones	11/11/13	Petition	11/12/13	email to sender
273	Andrew Jones	11/11/13	Petition	11/12/13	email to sender
274	Hunter Johnston	11/11/13	Petition	11/12/13	email to sender
275	Don Cooper	11/11/13	Petition	11/12/13	email to sender
276	Gerald Truitt	11/11/13	Petition	11/12/13	email to sender
277	John Aukard	11/11/13	Petition	11/12/13	email to sender
278	Joe Stefursky	11/11/13	Petition	11/12/13	email to sender
279	Andrey Orr	11/11/13	Petition	11/12/13	email to sender
280	Vic Tindall	11/11/13	Petition	11/12/13	email to sender
281	Arthur Cooley	11/11/13	Petition	11/12/13	email to sender

282	George Vickers	11/11/13	Petition	11/12/13	email to sender
283	Lewis Young	11/11/13	Petition	11/12/13	email to sender
284	Daniel Williams	11/11/13	Petition	11/12/13	email to sender
285	?	11/11/13	Petition	11/12/13	email to sender
286	M' Jernigan	11/11/13	Petition	11/12/13	email to sender
287	Henry Engster	11/11/13	Petition	11/12/13	email to sender
288	Sharon Engster	11/11/13	Petition	11/12/13	email to sender
289	John Nicholson	11/11/13	Petition	11/12/13	email to sender
290	Kathleen McLain	11/11/13	Petition	11/12/13	email to sender
291	Robert F. Brown	11/11/13	Petition	11/12/13	email to sender
292	Gail Anderson	11/11/13	Petition	11/12/13	email to sender
293	Stephen L Capelli	11/11/13	Petition	11/12/13	email to sender
294	Allen Brown	11/11/13	Petition	11/12/13	email to sender
295	George Whitehead	11/11/13	Petition	11/12/13	email to sender
296	William R Brown III	11/11/13	Email Letter	11/12/13	email
297	Katrin Tolson	11/11/13	Email Form Ltr	11/12/13	email
298	Clifton G Taylor III	11/11/13	Email Letter	11/12/13	email
299	Anne Thompson	11/11/13	Email Form Ltr	11/12/13	email
300	Jay Jones	11/11/13	Email Form Ltr	11/12/13	email
301	Liz Jones	11/11/13	Email Form Ltr	11/12/13	email
302	Deborah Ford	11/11/13	Email Form Ltr	11/12/13	email
303	Chrissy Watkinson	11/11/13	Email Form Ltr	11/12/13	email
304	Anne Thompson	11/11/13	Email Form Ltr	11/12/13	email
305	Dana Yates	11/11/13	Email Form Ltr	11/12/13	email
306	Christi Pruitt-Knierim	11/11/13	Email Form Ltr	11/12/13	email
307	Marilou Gordy	11/11/13	Email Form Ltr	11/12/13	email
308	Christal Marshall	11/11/13	Email Form Ltr	11/12/13	email
309	John Cullen	11/11/13	Email Form Ltr	11/12/13	email
310	Hannah Barber	11/11/13	Email Form Ltr	11/12/13	email
311	Nancy Pali	11/11/13	Email Form Ltr	11/12/13	email
312	Rick Lowe	11/11/13	Email Form Ltr	11/12/13	email
313	Paul Morris	11/11/13	Email Form Ltr	11/12/13	email
314	Angela Matthews	11/11/13	Email Form Ltr	11/12/13	email
315	Blair Shockley	11/11/13	Email Form Ltr	11/12/13	email
316	John Savage	11/11/13	Email Form Ltr	11/12/13	email
317	Drew Miller	11/11/13	Email Form Ltr	11/12/13	email
318	Daniel Nelson	11/11/13	Email Form Ltr	11/12/13	email
319	Kristen Wheatley	11/11/13	Email Form Ltr	11/12/13	email
320	Kay Bruch	11/11/13	Email Form Ltr	11/12/13	email
321	Bonnie Hatcher	11/11/13	Email Form Ltr	11/12/13	email
322	Peggy Kimes	11/11/13	Email Form Ltr	11/12/13	email
323	Kelly Bunting	11/11/13	Email Form Ltr	11/12/13	email
324	Heather Meyers	11/11/13	Email Form Ltr	11/12/13	email
325	Keith Hornberger	11/11/13	Email Form Ltr	11/12/13	email
326	Donna Mauro	11/11/13	Email Form Ltr	11/12/13	email
327	Laura Colonna	11/11/13	Email Form Ltr	11/12/13	email
328	Heather Campbell	11/11/13	Email Form Ltr	11/12/13	email

329	Rich Schmader	11/11/13	Email Form Ltr	11/12/13	email
330	Frank J Cruice	11/11/13	Email Form Ltr	11/12/13	email
331	Roger Smith	11/11/13	Email Form Ltr	11/12/13	email
332	Jack Strickland	11/11/13	Email Form Ltr	11/12/13	email
333	Teresa Adams	11/11/13	Email Form Ltr	11/12/13	email
334	Dave Roberts	11/11/13	Email Form Ltr	11/12/13	email
335	Kimberly McAllister	11/11/13	Email Form Ltr	11/13/13	email
336	Sharon Clark	11/11/13	Email Form Ltr	11/13/13	email
337	Val Garrison	11/11/13	Email Form Ltr	11/13/13	email
338	Denise Abbott	11/11/13	Email Form Ltr	11/13/13	email
339	Don Twilley	11/11/13	Email Form Ltr	11/13/13	email
340	Shirley Finley	11/11/13	Email Form Ltr	11/13/13	email
341	W. Dale Littleton	11/11/13	Email Form Ltr	11/13/13	email
342	Bob Boyd	11/11/13	Email Form Ltr	11/13/13	email
343	Johnathan Tarr	11/11/13	Email Form Ltr	11/13/13	email
344	Alyssa Cramer	11/11/13	Email Form Ltr	11/13/13	email
345	Paul P Jacko, Jr	11/11/13	Email Form Ltr	11/13/13	email
346	Joan Adrion	11/11/13	Email Form Ltr	11/13/13	email
347	Bill Lee	11/11/13	Email Form Ltr	11/13/13	email
348	Dave Brittingham	11/11/13	Email Form Ltr	11/13/13	email
349	Richard Wilhelmi	11/11/13	Email Form Ltr	11/13/13	email
350	Marty Fabac	11/11/13	Email Form Ltr	11/13/13	email
351	Jothivel Sundaram	11/11/13	Email Form Ltr	11/13/13	email
352	Teresa Reed	11/11/13	Email Form Ltr	11/13/13	email
353	Dave Stone	11/11/13	Email Form Ltr	11/13/13	email
354	Bruce Callaway	11/11/13	Email Form Ltr	11/13/13	email
355	Gus Lebois	11/11/13	Email Form Ltr	11/13/13	email
356	Carl Johnson	11/11/13	Email	11/13/13	email
357	Mark Hardison	11/11/13	Email Form Ltr	11/13/13	email
358	Phil Briggs	11/11/13	Email Form Ltr	11/13/13	email
359	Steve Sibert	11/11/13	Email Form Ltr	11/13/13	email
360	John R Alexander	11/11/13	Email Form Ltr	11/13/13	email
361	Brian Edelman	11/11/13	Email Form Ltr	11/13/13	email
362	Scot Palmateer	11/11/13	Email Form Ltr	11/13/13	email
363	Mike Meehan	11/11/13	Email Form Ltr	11/13/13	email
364	Heidi M Frey	11/11/13	Email Form Ltr	11/13/13	email
365	Carlos Ayala	11/11/13	Email Form Ltr	11/13/13	email
366	Jakob Walter, Jr	11/11/13	Email Form Ltr	11/13/13	email
367	Darrell J Oliphant	11/11/13	Email Form Ltr	11/13/13	email
368	Kristie Dunn	11/11/13	Email Form Ltr	11/13/13	email
369	Lisa Doyle	11/11/13	Email Form Ltr	11/13/13	email
370	Matthew Hearn	11/12/13	Email Form Ltr	11/13/13	email
371	David Bailey	11/12/13	Email Form Ltr	11/13/13	email
372	Alex Walter	11/12/13	Email Form Ltr	11/13/13	email
373	Scott L Kephart	11/12/13	Email Form Ltr	11/13/13	email
374	Tim Henninger	11/12/13	Email Form Ltr	11/13/13	email
375	Bonnie Hudson	11/12/13	Email Form Ltr	11/13/13	email

376	Tim and Theresa Wright	11/12/13	Email Form Ltr	11/13/13	email
377	Mike, Dee, Thomas and Lea	11/12/13	Email Form Ltr	11/13/13	email
378	Susan J Timmons	11/12/13	Email Form Ltr	11/13/13	email
379	Christy Baker	11/12/13	Email Form Ltr	11/13/13	email
380	Teresa L Ruark	11/12/13	Email Form Ltr	11/13/13	email
381	Lindsey Hamill	11/12/13	Email Form Ltr	11/13/13	email
382	Trish Solomon	11/12/13	Email Form Ltr	11/13/13	email
383	Bill See	11/12/13	Email Form Ltr	11/13/13	email
384	Tracie Davis	11/12/13	Email Form Ltr	11/13/13	email
385	Dean Minton	11/12/13	Email Form Ltr	11/13/13	email
386	Henry R James, Jr	11/12/13	Email Form Ltr	11/13/13	email
387	Brenda James	11/12/13	Email Form Ltr	11/13/13	email
388	Kevin J Ilardi	11/12/13	Email Form Ltr	11/13/13	email
389	Howard Long	11/12/13	Email Form Ltr	11/13/13	email
390	Donovan Kruchko	11/12/13	Email Form Ltr	11/13/13	email
391	Bob Peters	11/12/13	Email Form Ltr	11/13/13	email
392	Mark Passen	11/12/13	Email Form Ltr	11/13/13	email
393	Curtis Wooten	11/12/13	Email Note	11/13/13	email
394	Marc Sperry	11/12/13	Email Form Ltr	11/13/13	email
395	Mitzi Perdue	11/12/13	Email Note	11/13/13	email
396	Jennifer Bowling	11/12/13	Email Note	11/13/13	email
397	Kent Dennis	11/12/13	Email Form Ltr	11/13/13	email
398	Brittany Swiger	11/12/13	note, frm ltr 11	11/13/13	email
399	Bill Wallace	11/12/13	Email Form Ltr	11/13/13	email
400	Chris Brasher	11/12/13	E Note, Form Ltr	11/13/13	email
401	Wendy MacKinnis	11/12/13	Email Form Ltr	11/13/13	email
402	Gary Gordy	11/12/13	Email Form Ltr	11/13/13	email
403	Kelly Ewell	11/12/13	Email Form Ltr	11/13/13	email
404	Greg Ingraham	11/12/13	Email Form Ltr	11/13/13	email
405	Ken Janek	11/12/13	Email Form Ltr	11/13/13	email
406	John D Walston, Sr	11/12/13	Email Form Ltr	11/13/13	email
407	Gea Ayala	11/12/13	Email Form Ltr	11/13/13	email
408	Michael Adamson	11/12/13	Email Form Ltr	11/13/13	email
409	Carol Phillips	11/12/13	Email Form Ltr	11/13/13	email
410	George Betton	11/12/13	Email Form Ltr	11/13/13	email
411	Mark Garth	11/12/13	Email Form Ltr	11/13/13	email
412	Mike Knauer	11/12/13	Email Letter	11/13/13	email
413	Ron Airey	11/12/13	Email Form Ltr	11/13/13	email
414	Howard A "Mick" MacDona	11/12/13	Letter	11/13/13	mail
415	Robert Schoonover	11/12/13	Form Ltr w/Note	11/13/13	mail
416	Kimber and Kim Ward	11/12/13	Letter	11/13/13	mail
417	Somerset County Commion	11/12/13	Letter	11/13/13	mail
418	John Taylor, Jr	11/12/13	Postcard	11/13/13	mail
419	Andrew L McLean	11/12/13	Letter	11/13/13	mail
420	Patricia Wheedleton	11/12/13	Letter	11/13/13	mail
421	T Harry Wheedleton	11/12/13	Postcard	11/13/13	mail
422	Danny Saathoff	11/12/13	Postcard	11/13/13	mail

423	H Spencer Waller	11/12/13	Postcard	11/13/13	mail
424	Robert Worm	11/12/13	Postcard	11/13/13	mail
425	Barb Saathoff	11/12/13	Postcard	11/13/13	mail
426	Robert P Saathoff, Sr	11/12/13	Postcard	11/13/13	mail
427	George Windsor	11/12/13	Postcard	11/13/13	mail
428	Linda Candy	11/13/13	Email Form Ltr	11/13/13	email
429	Lynda Bromley	11/13/13	Email Form Ltr	11/13/13	email
430	Michael Diniar	11/13/13	Email Form Ltr	11/13/13	email
431	Joe Burns	11/13/13	Email Form Ltr	11/13/13	email
432	Gerard Graham	11/13/13	Email Form Ltr	11/13/13	email
433	Denise Ewing	11/13/13	Email Form Ltr	11/13/13	email
434	Bel Holden	11/13/13	Email Form Ltr	11/13/13	email
435	M Jean Walter	11/13/13	Email Form Ltr	11/13/13	email
436	Vic Hensley	11/13/13	Email Form Ltr	11/13/13	email
437	Tam Pham	11/13/13	Email Note	11/13/13	email
438	Tina Rites	11/13/13	Email Form Ltr	11/13/13	email
439	Patricia A Langenfelder	11/13/13	Letter	11/13/13	email
440	Kristin Hudson	11/13/13	Postcard	11/13/13	mail
441	Ethan Hudson	11/13/13	Postcard	11/13/13	mail
442	Roger Hudson	11/13/13	Postcard	11/13/13	mail
443	Alan Hudson	11/13/13	Postcard	11/13/13	mail
444	Charles J Otto	11/13/13	Postcard	11/13/13	mail
445	Candace Anderson	11/13/13	Postcard	11/13/13	mail
446	Roy J Ring III	11/13/13	Postcard	11/13/13	mail
447	Roy J Ring IV	11/13/13	Postcard	11/13/13	mail
448	James Payne, Jr	11/13/13	Postcard	11/13/13	mail
449	Charlin Casiano	11/13/13	Letter	11/13/13	mail
450	Kathryn Danko-Lord-Worces	11/13/13	Letter	11/13/13	mail
451	Hyung Choi	11/13/13	Form Letter	11/13/13	mail
452	Dean Stewart	11/13/13	Letter	11/13/13	mail
453	Seon Choi	11/13/13	Letter	11/13/13	mail
454	Patricia A Rhodes	11/13/13	Form Letter	11/13/13	mail
455	C Temple Rhodes, Jr	11/13/13	Form Letter	11/13/13	mail
456	Chris R Rhodes	11/13/13	Form Letter	11/13/13	mail
457	Jenny Rhodes	11/13/13	Form Letter	11/13/13	mail
458	Ryan S. Rhodes	11/13/13	Form Letter	11/13/13	mail
459	Marcella DiGregorio	11/13/13	Letter	11/13/13	mail
460	Ellen L Van Culin	11/13/13	Form Letter	11/13/13	mail
461	Joseph Kulley	11/13/13	Form ltr w/note	11/13/13	mail
462	David Herbst-Washington C	11/13/13	Email Note	11/13/13	email
463	Lawrence and Donna Thom	11/13/13	Fax Letter	11/13/13	mail
464	Herb Frerichs	11/13/13	Email Letter	11/13/13	email
465	JamesChurch-WorcesterCor	11/13/13	Fax & Email Ltr	11/13/13	mail
466	Maryann Jones	11/13/13	Form Letter	11/13/13	email
467	Joni Smith-Spinella	11/13/13	Email Letter	11/13/13	email
468	David Patey	11/13/13	Email Letter	11/13/13	email
469	Harold Davis	11/14/13	Form Letter	11/14/13	email

470	Bill Massey	11/14/13	Form Letter	11/14/13	email
471	Carol Oliphant	11/14/13	Form Letter	11/14/13	email
472	William Small	11/14/13	Form Letter	11/14/13	email
473	Allen Davis	11/14/13	Form Letter	11/14/13	email
474	Amy Bowers	11/14/13	Email Letter	11/14/13	email
475	Paul and Mary Jo Towers	11/14/13	UPS O/N Ltr	11/14/13	mail
476	Sarah Miller	11/14/13	Form Letter	11/14/13	email
477	Isaac Harford	11/14/13	Form Letter	11/14/13	email
478	Richard E Blevins	11/14/13	Form Letter	11/14/13	email
479	Karen Penney	11/14/13	Form Letter	11/14/13	email
480	William C Benson	11/14/13	Letter	11/14/13	email
481	David Hancock	11/14/13	Letter	11/14/13	email
482	Ronald W Van Culin	11/12/13	Form Letter	11/15/13	mail
483	Howard Spencer Waller	11/12/13	Letter	11/15/13	mail
484	Susan Marshall	11/12/13	Form Letter	11/15/13	mail
485	Sharon J Welsh	11/12/13	Letter	11/15/13	mail
486	Minh Vinh	11/14/13	Email Letter	11/14/13	email
487	Michelle Protani-Chesnik	11/14/13	Email Letter	11/14/13	email
488	Greg Griffith	11/14/13	Email Letter	11/14/13	email
489	Jason E Scott	11/14/13	Email Letter	11/14/13	email
490	The Honorable Andy Harris,	11/14/13	Email Letter	11/14/13	email
491	Scott Warner-Mid-Shore Re	11/14/13	Email Letter	11/14/13	email
492	Paul Chesnik	11/14/13	Email Letter	11/14/13	email
493	Mary Beth Carozza	11/14/13	Email Letter	11/14/13	email

241-295



Fwd: Phosphorus Management Tool Regulation Public Comments

Jo Mercer -MDA- <jo.mercer@maryland.gov>
To: Gloria Chambers -MDA- <Gloria.Chambers@maryland.gov>

Mon, Nov 11, 2013 at 10:53 AM

----- Forwarded message -----

From: <sabs55@comcast.net>
Date: Sun, Nov 10, 2013 at 2:07 PM
Subject: Phosphorus Management Tool Regulation Public Comments
To: jo.mercer@maryland.gov, earl.hance@maryland.gov

Please accept these more than 50 petition signatures from non-agricultural persons in the Salisbury area who are troubled by the MDA's proposed Phosphorus Management Tool regulation.

Like many other persons throughout the state, they believe the tool as written by the University of Maryland is not based on complete science, will cause huge economic disruption to the agricultural community and thus the entire state of Maryland, and is not good public policy.

They urge MDA to slow down the adoption of the proposed regulation and make significant changes to what has been proposed.

Thank you.

 20131106142753.pdf
622K

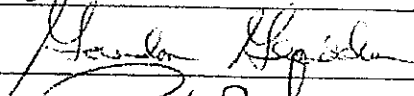
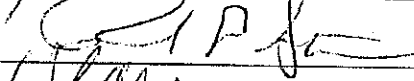
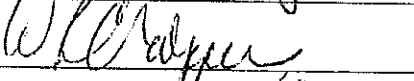
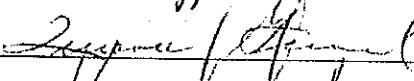
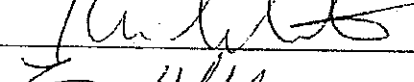
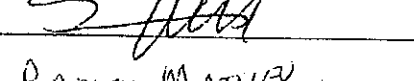
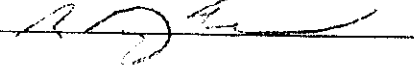
Petition Against Maryland Department of Agriculture Phosphorus Management Tool Regulation

We, the undersigned business owners/operators or citizens of Maryland, who are not farmers, chicken growers, or directly involved in the agricultural community, urge the Maryland Department of Agriculture to slow down implementation of the Phosphorus Management Tool regulation.

We believe it is premature to implement a far sweeping regulation of this sort based upon the incomplete science on which it is based. We are concerned that the state is moving forward without fully understanding the economic implications to the farming community and our region of the state. We believe there is not enough time to allow an orderly transition for the farming community. We believe the Department of Agriculture should be more concerned with supporting the famers and chicken growers of this state than appeasing the U.S. Environmental Protection Agency as it appears is occurring with this proposed regulation.

There is no valid environmental reason to move ahead so rapidly. Phosphorus accumulated on farm fields over decades and a multi-year phase-in to allow a more orderly transition is important.

We urge the Department of Agriculture to reconsider the breakneck pace at which this proposed regulation is being implemented.

	Printed Name	Town	Business Name	Signature	Date
241	CORDON GLADEN	SALISBURY	RETIRED		10/24/13
242	Rich Steven	Salisbury	Retired		10/24/13
243	Bill C. Coffey	SALISBURY	Salis Automotive		10/24/13
244	TERESA GREENWALD	SALISBURY	Ab. Educator		10/24/13
245	Hurt Schuster	Salisbury	Susan Acme		10-24-13
246	LWAYNE REICHARD	"	REICHARD REAL ESTATE LLC		10-24-13
247	Roy Mathew	"	RETIRED / INSURANCE	RAMON MATHEW	10 24 - 13
248	David P. Doran	"	RETIRED FORMER DORAN	David P. Doran	10/24/13
249	R. J. [unclear]	Eden	SPA		10/24/13

Petition Against Maryland Department of Agriculture Phosphorus Management Tool Regulation

We, the undersigned business owners/operators or citizens of Maryland, who are not farmers, chicken growers, or directly involved in the agricultural community, urge the Maryland Department of Agriculture to slow down implementation of the Phosphorus Management Tool regulation.

We believe it is premature to implement a far sweeping regulation of this sort based upon the incomplete science on which it is based. We are concerned that the state is moving forward without fully understanding the economic implications to the farming community and our region of the state. We believe there is not enough time to allow an orderly transition for the farming community. We believe the Department of Agriculture should be more concerned with supporting the famers and chicken growers of this state than appeasing the U.S. Environmental Protection Agency as it appears is occurring with this proposed regulation.

There is no valid environmental reason to move ahead so rapidly. Phosphorus accumulated on farm fields over decades and a multi-year phase-in to allow a more orderly transition is important.

We urge the Department of Agriculture to reconsider the breakneck pace at which this proposed regulation is being implemented.

	Printed Name	Town	Business Name	Signature	Date
250	RICHARD E. BARR SR	SALISBURY		Richard E. Barr Sr	10-24-13
251	DAVID A. MACLEOD	SALISBURY		David A. MacLeod	10-24-13
252	John M. Broyles	SALISBURY		John M. Broyles	10-24-13
253	Woodrow E. Vick	SALIS		Woodrow E. Vick	10-24-13
254	Josh Daugherty	Salisbury		Josh Daugherty	10-26-13
255	CHARLES BRENNER	SALISBURY		Charles Brenner	10-26-13
256	JOSEPH IVERS	SALISBURY		Joseph Ivers	10/26/13
257	Tim Young	Salisbury		Tim Young	
258	Steve Lee	Salisbury		Steve Lee	10/26/13
259	DON EWART	SALISBURY		Don Ewart	10/26/13

Petition Against Maryland Department of Agriculture Phosphorus Management Tool Regulation

We, the undersigned business owners/operators or citizens of Maryland, who are not farmers, chicken growers, or directly involved in the agricultural community, urge the Maryland Department of Agriculture to slow down implementation of the Phosphorus Management Tool regulation.

We believe it is premature to implement a far sweeping regulation of this sort based upon the incomplete science on which it is based. We are concerned that the state is moving forward without fully understanding the economic implications to the farming community and our region of the state. We believe there is not enough time to allow an orderly transition for the farming community. We believe the Department of Agriculture should be more concerned with supporting the famers and chicken growers of this state than appeasing the U.S. Environmental Protection Agency as it appears is occurring with this proposed regulation.

There is no valid environmental reason to move ahead so rapidly. Phosphorus accumulated on farm fields over decades and a multi-year phase-in to allow a more orderly transition is important.

We urge the Department of Agriculture to reconsider the breakneck pace at which this proposed regulation is being implemented.

	Printed Name	Town	Business Name	Signature	Date
260	JOCK McWain	SALISBURY	Retired	Jock McWain	10/24/13
261	Chris Peck	Salisbury	Sperry Van Ness	[Signature]	10/24/13
262	Ruth Broadbent	Salisbury	—	Ruth P. Broadbent	10/24/13
263	Fred Wuermin	"	—	Fred Wuermin	" " "
264	Mike Blorham	Willards	—	Mike Blorham	10/24/13
265	C. A. Whitmore	Seals	ret	C. A. Whitmore	10/24/13
266	W. H. PARKER	Salisbury	Ret	W H Parker	10/24/13
267	Ann S. Parker	Salisbury	retired	Ann S. Parker	10-24-13
268	Susan Satterfield	Salisbury	—	Susan Satterfield	10-24-13
269	Ronald E. Ewalt Jr.	Salisbury	RETIRED	Ronald E. Ewalt Jr.	10/26/13
270	Richard E. Duncanson	Salisbury	" "	Richard DUNCANSON	10/26/13

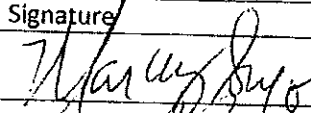
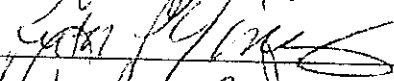
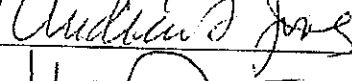
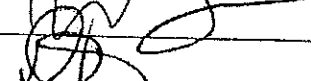

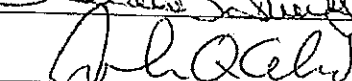
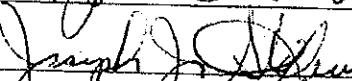
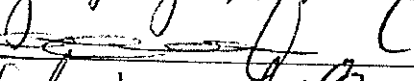
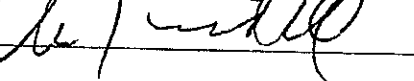

Petition Against Maryland Department of Agriculture Phosphorus Management Tool Regulation

We, the undersigned business owners/operators or citizens of Maryland, who are not farmers, chicken growers, or directly involved in the agricultural community, urge the Maryland Department of Agriculture to slow down implementation of the Phosphorus Management Tool regulation.

We believe it is premature to implement a far sweeping regulation of this sort based upon the incomplete science on which it is based. We are concerned that the state is moving forward without fully understanding the economic implications to the farming community and our region of the state. We believe there is not enough time to allow an orderly transition for the farming community. We believe the Department of Agriculture should be more concerned with supporting the farmers and chicken growers of this state than appeasing the U.S. Environmental Protection Agency as it appears is occurring with this proposed regulation.

There is no valid environmental reason to move ahead so rapidly. Phosphorus accumulated on farm fields over decades and a multi-year phase-in to allow a more orderly transition is important.

We urge the Department of Agriculture to reconsider the breakneck pace at which this proposed regulation is being implemented.

	Printed Name	Town	Business Name	Signature	Date
271	MARVIN BLYE	WILKESBORO	Caton & Blye, LLC		10/24/13
272	Ruth P Jones	Salisbury	Lombard Securities Inc		10/24/13
273	Arthur J Jones	Salisbury	Retired		10-24-2013
274	Hunter Johnston	Salisbury	Inacom		10-24-2013
275	Don Cooper	FRUITLAND	Cooper Diner		10/24/13
276	GERALD TRUITT	SALISBURY	RETIRED		10/24/13
277	John Aukward	Salisbury	BANK OF DELMARVA		10/24/13
278	JOE STEFURSKY	Salisbury	RETIRED		10/24/13
279	ANDREW ORN	Salisbury	Retired		10/24/2013
280	Vic Tindall	Salisbury	Registar		10/24/2013

Petition Against Maryland Department of Agriculture Phosphorus Management Tool Regulation

We, the undersigned business owners/operators or citizens of Maryland, who are not farmers, chicken growers, or directly involved in the agricultural community, urge the Maryland Department of Agriculture to slow down implementation of the Phosphorus Management Tool regulation.

We believe it is premature to implement a far sweeping regulation of this sort based upon the incomplete science on which it is based. We are concerned that the state is moving forward without fully understanding the economic implications to the farming community and our region of the state. We believe there is not enough time to allow an orderly transition for the farming community. We believe the Department of Agriculture should be more concerned with supporting the famers and chicken growers of this state than appeasing the U.S. Environmental Protection Agency as it appears is occurring with this proposed regulation.

There is no valid environmental reason to move ahead so rapidly. Phosphorus accumulated on farm fields over decades and a multi-year phase-in to allow a more orderly transition is important.

We urge the Department of Agriculture to reconsider the breakneck pace at which this proposed regulation is being implemented.

Printed Name	Town	Business Name	Signature	Date
ARTHUR COOLEY	SALISBURY	SHOPLAND INC	Arthur M Cooley	10/24/13
George Vickers	East New Market	Lifetime Massage	George Vickers	10/24/13
Lewis Young	Salisbury	Salisbury Beach	Lewis Young	10/24/13
Daniel P. Williams	Salisbury	Daniel P. Williams	D. Williams	10/24/13
Spencer	Salisbury	Worcester County	Spencer	10/24/13
Timothy Seavogian	Salisbury	Design Affordability	Timothy Seavogian	10/24/13

Petition Against Maryland Department of Agriculture Phosphorus Management Tool Regulation

We, the undersigned business owners/operators or citizens of Maryland, who are not farmers, chicken growers, or directly involved in the agricultural community, urge the Maryland Department of Agriculture to slow down implementation of the Phosphorus Management Tool regulation.

We believe it is premature to implement a far sweeping regulation of this sort based upon the incomplete science on which it is based. We are concerned that the state is moving forward without fully understanding the economic implications to the farming community and our region of the state. We believe there is not enough time to allow an orderly transition for the farming community. We believe the Department of Agriculture should be more concerned with supporting the farmers and chicken growers of this state than appeasing the U.S. Environmental Protection Agency as it appears is occurring with this proposed regulation.

There is no valid environmental reason to move ahead so rapidly. Phosphorus accumulated on farm fields over decades and a multi-year phase-in to allow a more orderly transition is important.

We urge the Department of Agriculture to reconsider the breakneck pace at which this proposed regulation is being implemented.

	Printed Name	Town	Business Name	Signature	Date
287	Henry Engster	Salisbury		Henry Engster	10/24/13
288	SHARON ENGSTER	SALISBURY		Sharon A Engster	10/24/13
289	John Nicholson	Princess Anne	Nicholson Contracting	John Nicholson	10/24/13
290	KATHLEEN McLain	SALISBURY		Kathleen McLain	10/24/13
291	Robert F. Proctor	Salisbury		Robert F. Proctor	10-24-13
292	GAIL ANDERSON	SALISBURY	GAIL C. ANDERSON AUD, P.H.	Gail C. Anderson	10/24/13
293	Stephen L. Capelli	Salisbury		Stephen L. Capelli	10-24-13
294	Allen Brown	Salisbury		Allen Brown	10-24-13
295	George Whitehead	Salisbury		George Whitehead	10-24-13

296
Mr. Earl Hance

Maryland Secretary of Agriculture

November 11, 2013

Secretary Hance,

Thank you for the meeting you sponsored in Easton on October 15th. I attended this meeting to learn as much as possible about the newly proposed changes to phosphorous management in the state. There were dozens of well thought out, compelling and logical reasons articulated why these proposed changes need to be delayed and revised including

1. Lack of Completed Science- the MPT is not a completed tool for P risk assessment. In addition, a regional group of soil scientists is working on this topic through a CIG. If Maryland formulates policy decisions on this research preemptively it may put the Maryland farming community at an significant economic disadvantage
2. No Economic Study has been completed to evaluate this policy impact to agriculture and the shore's economy as a whole.
3. No viable alternative options exist for farmers to market their manure. Perdue Agri Recycle is the exception
4. The Ag Sector is well ahead of its WIP goals
5. Poultry Production Data in the Model is inaccurate and grossly over states the contribution of N and P from poultry litter in the TMDL Bay Model . The Bay Program is working to get this corrected.

As I poultry farmer, I maintain a CNMP and the supporting records to stay in compliance of my CAFO permit. I also submit annual implementation reports to the MDE / MDA. In addition our operation has worked with the Soil Conservation Service and FSA to install and maintain several BMPs. Voluntarily; at the suggestion of our local conservationist we installed a 450 foot berm to retain 100% of all runoff from our production area. I work closely with 6-7 grain farmers that currently purchase and handle our manure. Compensation I receive for the value of this manure offsets my cake out and cleanout costs. I work hard to properly compost my farm mortality as to provide soil amendments that are suitable for land application. All of the grain farmers I cooperate with follow state approved nutrient management plans. In addition, I insist on proper coverings on all trucks hauling manure on public roads. I bring all this to your attention to make you aware of the efforts and changes our operation has made. I am not alone. Maryland poultry farms collectively have made similar changes.

Frankly, Mr. Secretary, I have become frustrated and discouraged about farming in our State due to these ever changing requirements. As a whole I am proud of the changes the poultry industry and our farm have made to improve water quality. This regulation I'm afraid will become a "defacto moratorium" on the land application of poultry manure. This we cannot live with.

I am not a grain farmer but many of my friends are. Using all chemical fertilizer will have major impact to their cost of production. I'm told as much as \$100-\$200 per acre. A strong competitive local grain market is vital to our economy here on the shore

One of the obvious short term affects is that my farm's cash flow will be reduced at a minimum of 14%. If local grain farmers can't use my manure as a fertilizer resource I will now have to hire and pay 3rd party contractors to clean out and recondition litter. In addition I will need to hire contractors to transport our manure to "state sites" that will receive this manure.

The increase in production costs will have a significant effect on New House cash flows. New house construction in the State has been negatively impacted by storm water and permitting requirements. Decreased cash flows will be a deterrent to new housing and its financing. New House construction is vital to the long term success of a regional poultry industry

This issue has already had an impact on our family's future. About a year ago we discovered one of our older chicken houses had significant structural damage. (Probably due to the 2010 blizzard). We decided to settle with the insurance company and not rebuild this house. The regulatory environment that Maryland has placed on broiler production and my operation played a role in this decision. I realize that one house makes little difference but over time the cumulative effect if others making similar decisions will.

I ask that the State study this issue carefully before making policy decisions that will affect so many

William R. Brown III

Maple Breeze Farm

6659 ENM Ellwood Rd

Hurlock Md 21643



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Tolson, Katrin <Katrin.Tolson@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>
Cc: "Schwalb, Steve" <Steve.Schwalb@perdue.com>

Mon, Nov 11, 2013 at 3:59 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its

results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Katrin Tolson

Salisbury, MD



Manure Regulation

cgt512@aol.com <cgt512@aol.com>

Mon, Nov 11, 2013 at 10:56 AM

To: earl.hance@maryland.gov

Dear Mr. Hance

I own Three poultry farms and raise broilers and have no crop land to apply my manure to. So I give it to my local farmer to help with his crop production. I feel it is supporting the local economy and saving the farmer a added expense for growing his crops. If this practice is reduced or eliminated it will cause an adverse affect on the farmer, grower, community and surrounding community.

I was at the meeting in Salisbury and listened to the comments that were given. It seams like this bill is going to be implemented weather the farm community wants it or not. I felt sorry for you and your colleagues. I know you were just doing what the law and other people are trying to impose to clean up the Chesapeake bay.

The government is suppose to be good at governing but is seams that this plan is almost as bad as the federal government trying to implement the law. It sometimes sounds like it is a good idea to do something but the people in the offices in government often are not in the trenches like we are daily.

So they don't really see or know how it will affect the people that the law is being applied to. I would hope that our governing body would take a long hard look at what their doing and the impact that this would have on other people that try to make a living off the land.

This is not a form letter this is a concerned citizen trying to express his voice and have it heard. I also understand from what you explained that every two years there is other implementations that are supposed to be done and evaluated . I would like to know what other things or programs are in store for the poultry farmer.

I will ask you, what do I do with my litter when my local farmer can no longer use my manure? Who do I contact and where does the state want the manure disposed to. I know you informed us of shipping cost and other expense that will be incurred . But no one has any idea what to do because there is no leadership to help with implementing this program.

The added expenses will reduce our ability to stay in business and be profitable. I don't know what our government has in store for the poultry industry and farm industry but it doesn't look good.

I soon see in the future that the chicken industry will no longer be wanted on the eastern shore or the western shore. But it is a vital part of our economy.

Please respond to my e-mail and forward this to your colleagues .

Thanks for taking time to listen to my concerns .

Clifton G. Taylor III
27571 Holland Crossing Rd.
Marion Station ,MD. 21838

Cell Phone 443-614-9566
Work Phone 410-623-3911
Fax 1-800-968-2269



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

annethompson12 . <annethompson12@gmail.com>
To: Earl.Hance@maryland.gov

Mon, Nov 11, 2013 at 3:50 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

- (1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;
- (2) Tested and proven plans are in place to deal with the excess organic fertilizer;

- (3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;
- (4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Anne Thompson
Newark, MD



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION.

Jones, Jay <Jay.Jones@perdue.com>

Mon, Nov 11, 2013 at 3:46 PM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Cc: "Schwalb, Steve" <Steve.Schwalb@perdue.com>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Jay Jones

East New Market, MD



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Jones, Liz <liz.jones@perdue.com>

Mon, Nov 11, 2013 at 3:46 PM

To: "earl.hance@maryland.gov" <earl.hance@maryland.gov>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its

results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Elizabeth Jones

Delmar, MD



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Conway, Deborah <Deborah.Conway@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 3:46 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Debbie Conway

Salisbury, MD



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

1 message

Watkinson, Chrissy <Chrissy.Watkinson@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 3:47 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Chrissy Watkinson

Princess Anne, Maryland



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Thompson, Anne <Anne.Thompson@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 3:47 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Anne Thompson

Newark, MD

Anne Thompson

Cost Accountant

Refined Oil & Meal Trading

Perdue Agribusiness

410-543-3167

This communication, including attachments, may contain confidential, privileged, copyrighted or other legally protected information. If you are not the intended recipient, you are hereby notified that any use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please immediately re-send this communication to the sender and delete the original message and any copy of it, including all attachments, from your computer system.



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Yates, Dana <Dana.Yates@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 3:47 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its

results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Dana Yates

Mardela Springs, MD



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Pruitt-Knierim, Christi <Christi.Pruitt-Knierim@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 3:47 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its

results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Christi Pruitt-Knierim



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Gordy, Marilou <Marilou.Gordy@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 3:47 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its

results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Marilou Gordy

Salisbury, Maryland



Earl Hance - Secretary of Agriculture

OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Marshall, Christal <Christal.Marshall@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 3:48 PM

Dear Secretary Hance:

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same

voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Christal Marshall

Salisbury, MD

Christal Marshall

410-543-3497 Office

410-341-5029 Fax

christal.marshall@perdue.com

This communication, including attachments, may contain confidential, privileged, copyrighted or other legally protected information. If you are not the intended recipient, you are hereby notified that any use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please immediately re-send this communication to the sender and delete the original message and any copy of it, including all attachments, from your computer system.



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Cullen, John <John.Cullen@perdue.com>

Mon, Nov 11, 2013 at 3:48 PM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

John Cullen

Millsboro, DE



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Barber, Hannah <Hannah.Barber@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 3:48 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Hannah Barber

Salisbury, MD



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Pali, Nancy <Nancy.Pali@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 3:49 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Nancy Pali

Salisbury, MD



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Lowe, Rick <Rick.Lowe@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>
Cc: "Schwalb, Steve" <Steve.Schwalb@perdue.com>

Mon, Nov 11, 2013 at 3:49 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Rick Lowe

Mardela Springs, MD 21837



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Morris, Paul <Paul.Morris@perdue.com>

Mon, Nov 11, 2013 at 3:49 PM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance,

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/ PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

L. Paul Morris, Jr.

Salisbury, Maryland



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Matthews, Angela <Angela.Matthews@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>
Cc: "Schwalb, Steve" <Steve.Schwalb@perdue.com>

Mon, Nov 11, 2013 at 3:49 PM

Dear Secretary Hance,

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management/Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

- (1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;
- (2) Tested and proven plans are in place to deal with the excess organic fertilizer;
- (3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;
- (4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Angela Matthews

Onancock, VA

Thanks

Angela M. Taylor-Matthews

Employment Process Administrator

Perdue Foods, LLC

22520 Lankford Hwy

Accomac, VA 23301

Phone: 757-787-5257

Fax: 757-787-5341

email: angela.matthews@perdue.com

Laugh when you can, apologize when you should, and let go of what you can't change. Life's too short to be anything... but happy.



A Family Commitment to Quality Since 1920™

CONFIDENTIALITY NOTICE

3/5

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Blair Shockley
Laurel, Delaware



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

john.savage@mchsi.com <john.savage@mchsi.com>

Mon, Nov 11, 2013 at 3:57 PM

To: Earl.Hance@maryland.gov

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

- (1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;
- (2) Tested and proven plans are in place to deal with the excess organic fertilizer;
- (3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;
- (4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

John Savage
Bishopville, MD



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Miller, Drew <Drew.Miller@perdue.com>

Mon, Nov 11, 2013 at 3:51 PM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

- (1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;
- (2) Tested and proven plans are in place to deal with the excess organic fertilizer;
- (3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;
- (4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Drew Miller

Salisbury, Maryland

This communication, including attachments, may contain confidential, privileged, copyrighted or other legally protected information. If you are not the intended recipient, you are hereby notified that any use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please immediately re-send this communication to the sender and delete the original message and any copy of it, including all attachments, from your computer system.



Earl Hance 444A, 444B, 444C, 444D, 444E, 444F, 444G, 444H, 444I, 444J, 444K, 444L, 444M, 444N, 444O, 444P, 444Q, 444R, 444S, 444T, 444U, 444V, 444W, 444X, 444Y, 444Z, 444AA, 444AB, 444AC, 444AD, 444AE, 444AF, 444AG, 444AH, 444AI, 444AJ, 444AK, 444AL, 444AM, 444AN, 444AO, 444AP, 444AQ, 444AR, 444AS, 444AT, 444AU, 444AV, 444AW, 444AX, 444AY, 444AZ, 444BA, 444BB, 444BC, 444BD, 444BE, 444BF, 444BG, 444BH, 444BI, 444BJ, 444BK, 444BL, 444BM, 444BN, 444BO, 444BP, 444BQ, 444BR, 444BS, 444BT, 444BU, 444BV, 444BW, 444BX, 444BY, 444BZ, 444CA, 444CB, 444CC, 444CD, 444CE, 444CF, 444CG, 444CH, 444CI, 444CJ, 444CK, 444CL, 444CM, 444CN, 444CO, 444CP, 444CQ, 444CR, 444CS, 444CT, 444CU, 444CV, 444CW, 444CX, 444CY, 444CZ, 444DA, 444DB, 444DC, 444DD, 444DE, 444DF, 444DG, 444DH, 444DI, 444DJ, 444DK, 444DL, 444DM, 444DN, 444DO, 444DP, 444DQ, 444DR, 444DS, 444DT, 444DU, 444DV, 444DW, 444DX, 444DY, 444DZ, 444EA, 444EB, 444EC, 444ED, 444EE, 444EF, 444EG, 444EH, 444EI, 444EJ, 444EK, 444EL, 444EM, 444EN, 444EO, 444EP, 444EQ, 444ER, 444ES, 444ET, 444EU, 444EV, 444EW, 444EX, 444EY, 444EZ, 444FA, 444FB, 444FC, 444FD, 444FE, 444FF, 444FG, 444FH, 444FI, 444FJ, 444FK, 444FL, 444FM, 444FN, 444FO, 444FP, 444FQ, 444FR, 444FS, 444FT, 444FU, 444FV, 444FW, 444FX, 444FY, 444FZ, 444GA, 444GB, 444GC, 444GD, 444GE, 444GF, 444GG, 444GH, 444GI, 444GJ, 444GK, 444GL, 444GM, 444GN, 444GO, 444GP, 444GQ, 444GR, 444GS, 444GT, 444GU, 444GV, 444GW, 444GX, 444GY, 444GZ, 444HA, 444HB, 444HC, 444HD, 444HE, 444HF, 444HG, 444HH, 444HI, 444HJ, 444HK, 444HL, 444HM, 444HN, 444HO, 444HP, 444HQ, 444HR, 444HS, 444HT, 444HU, 444HV, 444HW, 444HX, 444HY, 444HZ, 444IA, 444IB, 444IC, 444ID, 444IE, 444IF, 444IG, 444IH, 444II, 444IJ, 444IK, 444IL, 444IM, 444IN, 444IO, 444IP, 444IQ, 444IR, 444IS, 444IT, 444IU, 444IV, 444IW, 444IX, 444IY, 444IZ, 444JA, 444JB, 444JC, 444JD, 444JE, 444JF, 444JG, 444JH, 444JI, 444JJ, 444JK, 444JL, 444JM, 444JN, 444JO, 444JP, 444JQ, 444JR, 444JS, 444JT, 444JU, 444JV, 444JW, 444JX, 444JY, 444JZ, 444KA, 444KB, 444KC, 444KD, 444KE, 444KF, 444KG, 444KH, 444KI, 444KJ, 444KK, 444KL, 444KM, 444KN, 444KO, 444KP, 444KQ, 444KR, 444KS, 444KT, 444KU, 444KV, 444KW, 444KX, 444KY, 444KZ, 444LA, 444LB, 444LC, 444LD, 444LE, 444LF, 444LG, 444LH, 444LI, 444LJ, 444LK, 444LL, 444LM, 444LN, 444LO, 444LP, 444LQ, 444LR, 444LS, 444LT, 444LU, 444LV, 444LW, 444LX, 444LY, 444LZ, 444MA, 444MB, 444MC, 444MD, 444ME, 444MF, 444MG, 444MH, 444MI, 444MJ, 444MK, 444ML, 444MM, 444MN, 444MO, 444MP, 444MQ, 444MR, 444MS, 444MT, 444MU, 444MV, 444MW, 444MX, 444MY, 444MZ, 444NA, 444NB, 444NC, 444ND, 444NE, 444NF, 444NG, 444NH, 444NI, 444NJ, 444NK, 444NL, 444NM, 444NN, 444NO, 444NP, 444NQ, 444NR, 444NS, 444NT, 444NU, 444NV, 444NW, 444NX, 444NY, 444NZ, 444OA, 444OB, 444OC, 444OD, 444OE, 444OF, 444OG, 444OH, 444OI, 444OJ, 444OK, 444OL, 444OM, 444ON, 444OO, 444OP, 444OQ, 444OR, 444OS, 444OT, 444OU, 444OV, 444OW, 444OX, 444OY, 444OZ, 444PA, 444PB, 444PC, 444PD, 444PE, 444PF, 444PG, 444PH, 444PI, 444PJ, 444PK, 444PL, 444PM, 444PN, 444PO, 444PP, 444PQ, 444PR, 444PS, 444PT, 444PU, 444PV, 444PW, 444PX, 444PY, 444PZ, 444QA, 444QB, 444QC, 444QD, 444QE, 444QF, 444QG, 444QH, 444QI, 444QJ, 444QK, 444QL, 444QM, 444QN, 444QO, 444QP, 444QQ, 444QR, 444QS, 444QT, 444QU, 444QV, 444QW, 444QX, 444QY, 444QZ, 444RA, 444RB, 444RC, 444RD, 444RE, 444RF, 444RG, 444RH, 444RI, 444RJ, 444RK, 444RL, 444RM, 444RN, 444RO, 444RP, 444RQ, 444RR, 444RS, 444RT, 444RU, 444RV, 444RW, 444RX, 444RY, 444RZ, 444SA, 444SB, 444SC, 444SD, 444SE, 444SF, 444SG, 444SH, 444SI, 444SJ, 444SK, 444SL, 444SM, 444SN, 444SO, 444SP, 444SQ, 444SR, 444SS, 444ST, 444SU, 444SV, 444SW, 444SX, 444SY, 444SZ, 444TA, 444TB, 444TC, 444TD, 444TE, 444TF, 444TG, 444TH, 444TI, 444TJ, 444TK, 444TL, 444TM, 444TN, 444TO, 444TP, 444TQ, 444TR, 444TS, 444TT, 444TU, 444TV, 444TW, 444TX, 444TY, 444TZ, 444UA, 444UB, 444UC, 444UD, 444UE, 444UF, 444UG, 444UH, 444UI, 444UJ, 444UK, 444UL, 444UM, 444UN, 444UO, 444UP, 444UQ, 444UR, 444US, 444UT, 444UU, 444UV, 444UW, 444UX, 444UY, 444UZ, 444VA, 444VB, 444VC, 444VD, 444VE, 444VF, 444VG, 444VH, 444VI, 444VJ, 444VK, 444VL, 444VM, 444VN, 444VO, 444VP, 444VQ, 444VR, 444VS, 444VT, 444VU, 444VV, 444VW, 444VX, 444VY, 444VZ, 444WA, 444WB, 444WC, 444WD, 444WE, 444WF, 444WG, 444WH, 444WI, 444WJ, 444WK, 444WL, 444WM, 444WN, 444WO, 444WP, 444WQ, 444WR, 444WS, 444WT, 444WU, 444WV, 444WW, 444WX, 444WY, 444WZ, 444XA, 444XB, 444XC, 444XD, 444XE, 444XF, 444XG, 444XH, 444XI, 444XJ, 444XK, 444XL, 444XM, 444XN, 444XO, 444XP, 444XQ, 444XR, 444XS, 444XT, 444XU, 444XV, 444XW, 444XX, 444XY, 444XZ, 444YA, 444YB, 444YC, 444YD, 444YE, 444YF, 444YG, 444YH, 444YI, 444YJ, 444YK, 444YL, 444YM, 444YN, 444YO, 444YP, 444YQ, 444YR, 444YS, 444YT, 444YU, 444YV, 444YW, 444YX, 444YY, 444YZ, 444ZA, 444ZB, 444ZC, 444ZD, 444ZE, 444ZF, 444ZG, 444ZH, 444ZI, 444ZJ, 444ZK, 444ZL, 444ZM, 444ZN, 444ZO, 444ZP, 444ZQ, 444ZR, 444ZS, 444ZT, 444ZU, 444ZV, 444ZW, 444ZX, 444ZY, 444ZZ

OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Daniel Nelson <daniel.nelson.01@gmail.com>
To: Earl.Hance@maryland.gov

Mon, Nov 11, 2013 at 3:58 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its

results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Daniel Nelson

Whaleyville, MD



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Wheatley, Kristen <Kristen.Wheatley@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 3:51 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its

results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Kristen Wheatley

Quantico, MD



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Message

Bruch, Kay <Kay.Bruch@perdue.com>

Mon, Nov 11, 2013 at 3:52 PM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Kay E Bruch

Salisbury, MD



Call Action: 410-261-1000, 1-800-372-0000

OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Page 1 of 1

Hatcher, Bonnie <Bonnie.Hatcher@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>
Cc: "steve.schwalb@perdue.com." <steve.schwalb@perdue.com.>

Mon, Nov 11, 2013 at 3:53 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

- (1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;
- (2) Tested and proven plans are in place to deal with the excess organic fertilizer;
- (3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;
- (4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Bonnie Hatcher

Eden Md.



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Kimes, Peggy <Peggy.Kimes@perdue.com>
To: "earl.hance@maryland.gov" <earl.hance@maryland.gov>

Mon, Nov 11, 2013 at 3:53 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

- (1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;
- (2) Tested and proven plans are in place to deal with the excess organic fertilizer;
- (3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;
- (4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Peggy Kimes**Salisbury, MD**

This communication, including attachments, may contain confidential, privileged, copyrighted or other legally protected information. If you are not the intended recipient, you are hereby notified that any use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please immediately re-send this communication to the sender and delete the original message and any copy of it, including all attachments, from your computer system.



Sent from my iPhone

OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Bunting, Kelly <Kelly.Bunting@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>
Cc: "Schwalb, Steve" <Steve.Schwalb@perdue.com>

Mon, Nov 11, 2013 at 3:54 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its

results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Kelly Bunting

Berlin, MD



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Meyers, Heather <Heather.Meyers@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 3:55 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Heather Meyers

Laurel, Delaware



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

11/12/2013

Hornberger, Keith <Keith.Hornberger@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 3:56 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Keith Hornberger

Pocomoke City, MD 21851



Earl Hance, MDA, Assistant Secretary of Agriculture

OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Mauro, Donna <Donna.Mauro@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 3:57 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Donna Mauro

Berlin, MD



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Colonna, Laura <Laura.Colonna@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 3:58 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Laura Nelson Colonna



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Campbell, Heather <Heather.Campbell@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 3:58 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects

determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Heather Campbell

Delmar, MD.

This communication, including attachments, may contain confidential, privileged, copyrighted or other legally protected information. If you are not the intended recipient, you are hereby notified that any use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please immediately re-send this communication to the sender and delete the original message and any copy of it, including all attachments, from your computer system.



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Schmader, Rich <Rich.Schmader@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 3:59 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

- (1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;
- (2) Tested and proven plans are in place to deal with the excess organic fertilizer;
- (3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;
- (4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Richard Schmader

Salisbury, Maryland

330

MARYLAND

Enrollment Act of 1790, Chapter 1, Section 1

Maryland Department of Agriculture (MDA)'s Proposed Nutrient Management-Phosphorous Management Tool (PMT) regulation

Frank J Cruice <fjcruice@mchsi.com>

Mon, Nov 11, 2013 at 4:06 PM

Reply-To: Frank J Cruice <fjcruice@mchsi.com>

To: "." <Earl.Hance@maryland.gov>

Cc: james mathias <james.mathias@senate.state.md.us>, norman conway <norman.conway@house.state.md.us>, "McDermott, Mike" <mike.mcdermott@house.state.md.us>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland for our livelihood. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

- (1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;
- (2) Tested and proven plans are in place to deal with the excess organic fertilizer;
- (3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;
- (4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders or those who work in Maryland, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Frank J Cruice
 MAJ, MSC, USA (Retired)


MARYLAND

Earl Hance (PMT) - PMT Opposition Emails

Phosphorous Regulation

Smith, Roger <Roger.Smith@perdue.com>

Mon, Nov 11, 2013 at 4:00 PM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

- (1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;
- (2) Tested and proven plans are in place to deal with the excess organic fertilizer;
- (3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;
- (4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay.

This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state

Roger R. Smith

Salisbury, MD 21875

This communication, including attachments, may contain confidential, privileged, copyrighted or other legally protected information. If you are not the intended recipient, you are hereby notified that any use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please immediately re-send this communication to the sender and delete the original message and any copy of it, including all attachments, from your computer system.



Earl Hance - MDA - Secretary

MDA Regulations

Strickland, Jack <Jack.Strickland@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 4:00 PM

Dear Secretary Hance,

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Jack Strickland

Rogers, AR



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL

11/08/2013

Adams, Teresa <Teresa.Adams@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 4:02 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Teresa Adams



To: Hance MDA, from: Dave Roberts, 11/11/2013

Phosphorus Management Tool regulation proposed.

Roberts, Dave <Dave.Roberts@perdue.com>

Mon, Nov 11, 2013 at 4:03 PM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Dave Roberts

Salisbury, Maryland



Phosphorous Management

McAllister, Kimberly <Kimberly.McAllister@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 4:03 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Kimberly McAllister

Bishopville, Md



OPPOSITION TO PROPOSED MARYLAND PHOSPHORUS MANAGEMENT TOOL REGULATION

Clark, Sharon <Sharon.Clark@perdue.com>

Mon, Nov 11, 2013 at 4:05 PM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers and the many businesses supporting agriculture in Maryland is extremely significant. Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer.

I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until:

(1) A full economic impact study is completed, publicized, discussed and its

results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, I support the continued restoration of the Chesapeake Bay. This land and the bay is my home. It is important to consider that agriculture has already made significant progress on the Chesapeake Bay Model and that the PMT remains a work in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Sharon Clark

Salisbury, MD



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Val Garrison <vrene25@yahoo.com>

Mon, Nov 11, 2013 at 4:11 PM

Reply-To: Val Garrison <vrene25@yahoo.com>

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

My family and I are **dependent** upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic

fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, my family and I support the continued restoration of the Chesapeake Bay. This land and the bay are our homes and the homes of my grandparents who were poultry growers and farmers. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Valerie R. Garrison
Salisbury, Maryland



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Abbott, Denise <Denise.Abbott@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 4:08 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Denise R. Abbott

Princess Anne, MD 21853

This communication, including attachments, may contain confidential, privileged, copyrighted or other legally protected information. If you are not the intended recipient, you are hereby notified that any use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please immediately re-send this communication to the sender and delete the original message and any copy of it, including all attachments, from your computer system.



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Don Twilley <dontwilley@comcast.net>
To: Earl.Hance@maryland.gov

Mon, Nov 11, 2013 at 4:15 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its

results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Don Twilley



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Finley, Shirley <Shirley.Finley@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>
Cc: "Schwalb, Steve" <Steve.Schwalb@perdue.com>

Mon, Nov 11, 2013 at 4:11 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Shirley Finley

Salisbury, MD



Earl Hance, MDA Secretary, Agriculture

(no subject)

Littleton, William <William.Littleton@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>
Cc: "Schwalb, Steve" <Steve.Schwalb@perdue.com>

Mon, Nov 11, 2013 at 4:13 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Dale Littleton

Pittsville, Maryland. 21850



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Boyd, Bob <Bob.Boyd@perdue.com>

Mon, Nov 11, 2013 at 4:19 PM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Robert J. Boyd, Jr.

Bethany Beach, Delaware

343

**MARYLAND**

OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Tarr, Johnathan <Johnathan.Tarr@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 4:19 PM

Dear Secretary Hance;

Please see the below email, which I fully support.

I would also be very interested in seeing the same scrutiny that we apply to agriculture being applied to other areas, such as waste water treatment facilities. My understanding is that Salisbury's own waste water treatment plant has had various spills directly into the Wicomico River. Our government, at all levels, should embody the changes we wish to see in the Chesapeake Bay.

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them

has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Johnathan Tarr

Salisbury, MD

Johnathan Tarr

Project Lead

Perdue Farms Inc.

410.341.2150 (desk) | 410.251.7015 (cell)

This communication, including attachments, may contain confidential, privileged, copyrighted or other legally protected information. If you are not the intended recipient, you are hereby notified that any use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please immediately re-send this communication to the sender and delete the original message and any copy of it, including all attachments, from your computer system.



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Cramer, Alyssa <Alyssa.Cramer@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 4:20 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Alyssa Cramer

Salisbury, MD



OPPOSITION TO PROPOSED MARYLAND PHOSPOROUS MANAGEMENT TOOL REGULATION

Jacko, Paul <Paul.Jacko@perdue.com>

Mon, Nov 11, 2013 at 4:24 PM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Paul P. Jacko Jr.

Delmar, MD



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Adrion, Joan <Joan.Adrion@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 4:25 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

- (1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;
- (2) Tested and proven plans are in place to deal with the excess organic fertilizer;
- (3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;
- (4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Joan M. Adrion

Salisbury, MD



Earl Hance PMA Information & Action

OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Lee, Bill <Bill.Lee@perdue.com>

Mon, Nov 11, 2013 at 4:25 PM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

William Lee

Salisbury, MD



Earl Hance - Secretary of Agriculture

OPPOSITION TO PROPOSED MARYLAND PHOSPHORUS MANAGEMENT TOOL REGULATION

davebrittingham@yahoo.com <davebrittingham@yahoo.com>

Mon, Nov 11, 2013 at 4:38 PM

Reply-To: davebrittingham@yahoo.com

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic

fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Dave Brittingham
Salisbury, MD



Opposition to proposed Maryland phosphorous management tool regulation

Wilhelmi, Richard <Richard.Wilhelmi@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>
Cc: "Schwalb, Steve" <Steve.Schwalb@perdue.com>

Mon, Nov 11, 2013 at 4:35 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Richard L. Wilhelmi

Princess Anne, MD



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Fabac, Marty <Marty.Fabac@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 4:36 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

- (1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;
- (2) Tested and proven plans are in place to deal with the excess organic fertilizer;
- (3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;
- (4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Marty Fabac

Berlin, MD

This communication, including attachments, may contain confidential, privileged, copyrighted or other legally protected information. If you are not the intended recipient, you are hereby notified that any use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please immediately re-send this communication to the sender and delete the original message and any copy of it, including all attachments, from your computer system.



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Sundaram, Jothivel <Jothivel.Sundaram@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 4:51 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its

results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Jothivel Sundaram

Salisbury, Maryland.



Sent from my iPhone

OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION.

Reed, Teresa <Teresa.Reed@perdue.com>

Mon, Nov 11, 2013 at 4:52 PM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its

results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Teresa Reed

Mardela Springs, MD



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

11/13/2013

Stone, Dave <Dave.Stone@perdue.com>

Mon, Nov 11, 2013 at 4:55 PM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

David Stone

Preston, MD.



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Callaway, Bruce <Bruce.Callaway@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>
Cc: "Schwalb, Steve" <Steve.Schwalb@perdue.com>

Mon, Nov 11, 2013 at 5:00 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Bruce and Cindy Callaway

Salisbury, MD



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Lebois, Gus <Gus.Lebois@perdue.com>

Mon, Nov 11, 2013 at 5:02 PM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Cc: "Schwalb, Steve" <Steve.Schwalb@perdue.com>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Gus Lebois

356



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL

Johnson, Carl <Carl.Johnson@perdue.com>

Mon, Nov 11, 2013 at 5:06 PM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

My family and I, my community, my farm, the company that I work for, the poultry industry, and agriculture as a whole depend upon the efficient use of resources. The use of organic fertilizer, specifically poultry manure, in the production of crops is a vital component in the success of agriculture in this region. I oppose the implementation of the phosphorous tool management tool until such time as additional scientific and economic studies are completed and published.

Respectfully submitted,

Carl Johnson

Owner of a family farm in Parsonsburg, MD

And an employee of a poultry integrator

This communication, including attachments, may contain confidential, privileged, copyrighted or other legally protected information. If you are not the intended recipient, you are hereby notified that any use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please immediately re-send this communication to the sender and delete the original message and any copy of it, including all attachments, from your computer system.



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Mark Hardison <mhardisoncpm@gmail.com>
To: Earl.Hance@maryland.gov

Mon, Nov 11, 2013 at 5:15 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

- (3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;
- (4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Mark Hardison
Parsonsburg, MD

358

MARYLAND

OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Philip Briggs <pbriggs@mchsi.com>
Reply-To: Philip Briggs <pbriggs@mchsi.com>
To: Earl.Hance@maryland.gov

Mon, Nov 11, 2013 at 5:25 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

- (1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;
- (2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Phil Briggs

Willards, MD



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Sibert, Steve <Steve.Sibert@perdue.com>

Mon, Nov 11, 2013 at 5:34 PM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its

results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Stephen Sibert

Salisbury, Maryland



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION.

Alexander, Jack <Jack.Alexander@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 5:34 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Sincerely,

John R. Alexander

Salisbury, MD 21804

This communication, including attachments, may contain confidential, privileged, copyrighted or other legally protected information. If you are not the intended recipient, you are hereby notified that any use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please immediately re-send this communication to the sender and delete the original message and any copy of it, including all attachments, from your computer system.



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Edelmann, Brian <Brian.Edelmann@colemannatural.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 5:55 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Brian Edelmann

Berlin, MD

362


MARYLAND

Delivered: 11/11/2013 6:21 PM

OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Palmateer, Scot <Scot.Palmateer@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mon, Nov 11, 2013 at 6:21 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Scot Palmateer

Hebron Maryland



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Meehan, Mike <Mike.Meehan@perdue.com>

Mon, Nov 11, 2013 at 6:28 PM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Michael Meehan

Salisbury, Md



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION.

Heidi <hpetsit@yahoo.com>

Mon, Nov 11, 2013 at 6:44 PM

Reply-To: Heidi <hpetsit@yahoo.com>

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

- (1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;
- (2) Tested and proven plans are in place to deal with the excess organic fertilizer;
- (3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;
- (4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Heidi M Frey
Worton, MD



Let's block the PMT - Nutrient Management regulations!

Please block the Nutrient Management/PMT regulations!

Carlos Ayala <carlos.ayala@comcast.net>

Mon, Nov 11, 2013 at 6:57 PM

To: Earl.Hance@maryland.gov

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until:

- (1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;
- (2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Important to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remains a work in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters - and I'm one of them - have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Carlos Ayala
Salisbury, MD 21801



Nutrient Management / Phosphorous Management Tool

Nutrient Management / Phosphorous Management Tool

C HANCE

Jakob Walter Jr <jakobwalterjr@gmail.com>

Mon, Nov 11, 2013 at 7:54 PM

To: Earl.Hance@maryland.gov

Cc: steve.schwalb@perdue.com

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Jakob Walter Jr.

Marion, Maryland



Earl Hance 4.18.13 10:00 AM

OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Oliphant, Darrell <Darrell.Oliphant@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>
Cc: "Schwalb, Steve" <Steve.Schwalb@perdue.com>

Mon, Nov 11, 2013 at 8:13 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic

fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Darrell J. Oliphant
Gumboro, Delaware

This communication, including attachments, may contain confidential, privileged, copyrighted or other legally protected information. If you are not the intended recipient, you are hereby notified that any use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please immediately re-send this communication to the sender and delete the original message and any copy of it, including all attachments, from your computer system.



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

4 pages

Dunn, Kristie <Kristie.Dunn@perdue.com>

Mon, Nov 11, 2013 at 8:30 PM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its

results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Kristie Dunn

Salisbury, Maryland



PMT regulation

ctroydoyle@comcast.net <ctroydoyle@comcast.net>

Mon, Nov 11, 2013 at 9:08 PM

To: Earl.Hance@maryland.gov

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until:

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what

alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Lisa Doyle

Quantico, MD



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Hearn, Matthew <Matthew.Hearn@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Tue, Nov 12, 2013 at 5:53 AM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Matthew Hearn



Excluded from automatic deletion

OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Bailey, David <David.Bailey@perdue.com>
To: "Earl.hance@maryland.gov" <Earl.hance@maryland.gov>

Tue, Nov 12, 2013 at 6:46 AM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

- (1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;
- (2) Tested and proven plans are in place to deal with the excess organic fertilizer;
- (3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;
- (4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

David Bailey

Parsonsburg, MD



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION.

Walter, Alex <alex.walter@perdue.com>

Tue, Nov 12, 2013 at 6:50 AM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Alex Walter

Fruitland, MD.

373


MARYLAND

OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Kephart, Scott <Scott.Kephart@perdue.com>

Tue, Nov 12, 2013 at 7:08 AM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Cc: "Schwalb, Steve" <Steve.Schwalb@perdue.com>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

- (1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;
- (2) Tested and proven plans are in place to deal with the excess organic fertilizer;
- (3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;
- (4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Scott L. Kephart

Parsonsburg, Maryland



PMT Opposition Emails - Search Results

(no subject)

Henninger, Tim <Tim.Henninger@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>
Cc: "steve.schwalb@perdue.com." <steve.schwalb@perdue.com.>

Tue, Nov 12, 2013 at 7:09 AM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its

results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Tim Henninger

Felton De

11/13/13
375

MARYLAND

Sent: Tuesday, November 12, 2013 7:23 AM

OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Hudson, Bonnie <Bonnie.Hudson@perdue.com>
To: "Earl.Hance@Maryland.gov" <Earl.Hance@maryland.gov>
Cc: "Schwalb, Steve" <Steve.Schwalb@perdue.com>

Tue, Nov 12, 2013 at 7:23 AM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Bonnie Hudson

Bishopville, Maryland



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Wright, Theresa <Theresa.Wright@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>
Cc: "Schwalb, Steve" <Steve.Schwalb@perdue.com>

Tue, Nov 12, 2013 at 7:38 AM

Dear Secretary Hance,

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

- (1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;
- (2) Tested and proven plans are in place to deal with the excess organic fertilizer;
- (3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;
- (4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Tim and Theresa Wright

Mardela Springs, MD 21837

This communication, including attachments, may contain confidential, privileged, copyrighted or other legally protected information. If you are not the intended recipient, you are hereby notified that any use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please immediately re-send this communication to the sender and delete the original message and any copy of it, including all attachments, from your computer system.



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION.

Phillips, Mike <Mike.Phillips@perdue.com>

Tue, Nov 12, 2013 at 7:45 AM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Mike, Dee, Thomas, and Leah Phillips

24668 Nanticoke Rd.



Opposition to Proposed Maryland Phosphorous Management Tool Regulation

Timmons, Susan <Susan.Timmons@perdue.com>
To: "earl.hance@maryland.gov" <earl.hance@maryland.gov>

Tue, Nov 12, 2013 at 7:59 AM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Susan J Timmons

Berlin, Maryland



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Message

Baker, Christy <Christy.Baker@perdue.com>
To: "earl.hance@maryland.gov" <earl.hance@maryland.gov>

Tue, Nov 12, 2013 at 8:03 AM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Christy K Baker

Salisbury, MD



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Ruark, Terri <Terri.Ruark@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Tue, Nov 12, 2013 at 8:07 AM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its

results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Teresa L. Ruark,
Sharptown, MD



Earl Hance MDA - Secretary of Agriculture

OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Hamill, Lindsey <lindsey.hamill@perdue.com>
 To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Tue, Nov 12, 2013 at 8:12 AM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its

results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Lindsey Hamill

Salisbury, MD



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Solomon, Trish <Trish.Solomon@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>
Cc: "Schwalb, Steve" <Steve.Schwalb@perdue.com>

Tue, Nov 12, 2013 at 8:12 AM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Trish Solomon

Delmar, De



Earl Hance <MDA-4621.hance@maryland.gov>

OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

See, Bill <Bill.See@perdue.com>

Tue, Nov 12, 2013 at 8:22 AM

To: "earl.hance@maryland.gov" <earl.hance@maryland.gov>

To Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Bill See

Delmar, DE



opposition to PMT

Davis, Tracie <Tracie.Davis@perdue.com>

Tue, Nov 12, 2013 at 8:23 AM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Tracie Davis

Salisbury, Maryland



Earl Hance - MDA - 11/12/13 10:34 AM

Opposition to the proposed MDA regulations

Minton, Dean <Dean.Minton@perdue.com>

Tue, Nov 12, 2013 at 8:34 AM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Dean Minton

310 East 4th St.

Laurel, DE 19956

386

November 12, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S. Truman Parkway
Annapolis, Maryland 21401

Dear Dr. Mercer:

I am extremely concerned about the Maryland Department of Agriculture's proposed regulation related to the Phosphorus Management Tool.

My first fear is that the proposed regulation, which will have huge impacts on the state's agricultural community, is based on incomplete research. The University of Maryland researchers have stated that their work is not done, yet the state is moving forward at breakneck speed for what appears to be political reasons. Rather than being focused on how to support and improve the agricultural community, the department seems more concerned with appeasing the U.S. Environmental Protection Agency. If the farming sector in Maryland was lagging in achieving Chesapeake Bay Watershed Implementation Plan goals, then perhaps enhanced efforts would be needed, but as Secretary of Agriculture Hance has stated, we are at 130% of the goal. That's an accomplishment that seems to be lost on Governor O'Malley, the Maryland Department of Agriculture, and the EPA.

Allowing an extended and orderly phase-in of the implementation date of the Phosphorous Management Tool will cause no environmental harm. For decades, the scientific and regulatory community told farmers not to worry about applications of phosphorus to the soil because unless the soil moved, the phosphorus would not move. Recently, that thinking changed and farmers began applying manures based upon their phosphorus content. The phosphorus levels in soils and waters were achieved over decades and will not be corrected for decades, even if this new regulation changes manure application procedures in 2015. Waiting a few more years to allow for an orderly phase-in will not cause any harm to our environment. An orderly phase-in will allow the agricultural community to adjust and make required changes. Additionally, we saw firsthand how difficult and time consuming it was for Maryland CAFO farmers to obtain a Comprehensive Nutrient Management Plan and to think the conservation districts, the University of Maryland Extension, and/or private consultants can do enough side-by-side Phosphorus Site Index/Phosphorus Management Tool comparisons in 2014 to provide valid results does not seem feasible.

Here are some of my concerns about the near-immediate implementation of this regulation. First and foremost, how can the Department of Agriculture even think about proposing a regulation that could cause such financial hardships on farm families when no meaningful economic impact analysis has been done?

Chicken Farms

- Denied the ability to use manure, a locally produced organic fertilizer, on their own crops, some chicken farmers will have to buy commercial fertilizer to replace chicken manure they already own. That will have a negative economic impact on the chicken growers.
- Chicken growers who have been selling their manure to other farmers may no longer have customers, thus a loss of income.
- Chicken growers who have had their chicken houses cleaned with manure removed from the farm without charge may now have to pay somebody to clean the houses and transport the manure since the cleaning/transporting company may not be able to sell the manure to make a profit and cover the costs of cleaning/transporting.
- Even if the MDA establishes the state storage sites, it will be the chicken growers' responsibility to transport the manure to the site, possibly creating a cost for the chicken growers.
- If the value of manure is lost, then alternative use companies might start charging a fee to accept manure, much like a landfill charges for disposal. If any alternative use companies start operating, and nothing of any magnitude appears to be on the horizon, they might charge a disposal fee instead of buying manure or accepting it for free.

Crop Farmers

- Denied the ability to use manure on their crops, crop farmers will have to buy commercial fertilizer to replace chicken manure that they have been using.
- Crop farmers who have used manure and not commercial fertilizers may have to buy or rent commercial fertilizer application equipment, thus raising their costs of doing business.
- Crop farmers wanting to hire a fertilizer applicator might find that there are not enough applicators or equipment in the short fertilizer application period to allow timely fertilizer applications. Increased demand in services will allow these applicators to raise their fees, thus higher costs for crop farmers.
- While commercial fertilizer will help a crop grow, the micronutrients and organic material in animal manure will help grow a larger crop. If yields are lessened due to the loss of organic material and micronutrients, then farmer income will diminish.
- Crop farmers and chicken farmers alike will most likely have to alter their business plans in ways that weaken their ability to withstand adverse growing conditions and/or markets – requiring new expenditures/capital purchases while at the same time artificially reducing their potential yields.
- Crop farmers could see increased effects of drought on their crops as a result of losing poultry litter's organic material that helps build up the soil's moisture retaining capabilities.

Once this regulation is in effect, as it appears it will be and contrary to the wishes of many in the agricultural community, there will be many negative effects to the farming community, individuals like me, and the entire state of Maryland without noticeable improvements in water quality.

Please, slow this down. Allow the scientific research to be completed and then allow an orderly phase-in much as the game-changing Water Quality Improvement Act of 1998 allowed a

phase-in period. Without alternative uses of manure and cost effective replacements for this soon-to-be lost organic fertilizer, tremendous harm will come to the state of Maryland without improving the environment.

Respectfully yours,

A handwritten signature in cursive script that reads "Brenda B James".

Brenda B James
Salisbury Md

387

November 12, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S. Truman Parkway
Annapolis, Maryland 21401

Dear Dr. Mercer:

I am extremely concerned about the Maryland Department of Agriculture's proposed regulation related to the Phosphorus Management Tool.

My first fear is that the proposed regulation, which will have huge impacts on the state's agricultural community, is based on incomplete research. The University of Maryland researchers have stated that their work is not done, yet the state is moving forward at breakneck speed for what appears to be political reasons. Rather than being focused on how to support and improve the agricultural community, the department seems more concerned with appeasing the U.S. Environmental Protection Agency. If the farming sector in Maryland was lagging in achieving Chesapeake Bay Watershed Implementation Plan goals, then perhaps enhanced efforts would be needed, but as Secretary of Agriculture Hance has stated, we are at 130% of the goal. That's an accomplishment that seems to be lost on Governor O'Malley, the Maryland Department of Agriculture, and the EPA.

Allowing an extended and orderly phase-in of the implementation date of the Phosphorous Management Tool will cause no environmental harm. For decades, the scientific and regulatory community told farmers not to worry about applications of phosphorus to the soil because unless the soil moved, the phosphorus would not move. Recently, that thinking changed and farmers began applying manures based upon their phosphorus content. The phosphorus levels in soils and waters were achieved over decades and will not be corrected for decades, even if this new regulation changes manure application procedures in 2015. Waiting a few more years to allow for an orderly phase-in will not cause any harm to our environment. An orderly phase-in will allow the agricultural community to adjust and make required changes. Additionally, we saw firsthand how difficult and time consuming it was for Maryland CAFO farmers to obtain a Comprehensive Nutrient Management Plan and to think the conservation districts, the University of Maryland Extension, and/or private consultants can do enough side-by-side Phosphorus Site Index/Phosphorus Management Tool comparisons in 2014 to provide valid results does not seem feasible.

Here are some of my concerns about the near-immediate implementation of this regulation. First and foremost, how can the Department of Agriculture even think about proposing a regulation that could cause such financial hardships on farm families when no meaningful economic impact analysis has been done?

Chicken Farms

- Denied the ability to use manure, a locally produced organic fertilizer, on their own crops, some chicken farmers will have to buy commercial fertilizer to replace chicken manure they already own. That will have a negative economic impact on the chicken growers.
- Chicken growers who have been selling their manure to other farmers may no longer have customers, thus a loss of income.
- Chicken growers who have had their chicken houses cleaned with manure removed from the farm without charge may now have to pay somebody to clean the houses and transport the manure since the cleaning/transporting company may not be able to sell the manure to make a profit and cover the costs of cleaning/transporting.
- Even if the MDA establishes the state storage sites, it will be the chicken growers' responsibility to transport the manure to the site, possibly creating a cost for the chicken growers.
- If the value of manure is lost, then alternative use companies might start charging a fee to accept manure, much like a landfill charges for disposal. If any alternative use companies start operating, and nothing of any magnitude appears to be on the horizon, they might charge a disposal fee instead of buying manure or accepting it for free.

Crop Farmers

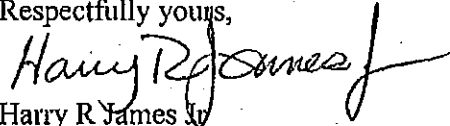
- Denied the ability to use manure on their crops, crop farmers will have to buy commercial fertilizer to replace chicken manure that they have been using.
- Crop farmers who have used manure and not commercial fertilizers may have to buy or rent commercial fertilizer application equipment, thus raising their costs of doing business.
- Crop farmers wanting to hire a fertilizer applicator might find that there are not enough applicators or equipment in the short fertilizer application period to allow timely fertilizer applications. Increased demand in services will allow these applicators to raise their fees, thus higher costs for crop farmers.
- While commercial fertilizer will help a crop grow, the micronutrients and organic material in animal manure will help grow a larger crop. If yields are lessened due to the loss of organic material and micronutrients, then farmer income will diminish.
- Crop farmers and chicken farmers alike will most likely have to alter their business plans in ways that weaken their ability to withstand adverse growing conditions and/or markets – requiring new expenditures/capital purchases while at the same time artificially reducing their potential yields.
- Crop farmers could see increased effects of drought on their crops as a result of losing poultry litter's organic material that helps build up the soil's moisture retaining capabilities.

Once this regulation is in effect, as it appears it will be and contrary to the wishes of many in the agricultural community, there will be many negative effects to the farming community, individuals like me, and the entire state of Maryland without noticeable improvements in water quality.

Please, slow this down. Allow the scientific research to be completed and then allow an orderly phase-in much as the game-changing Water Quality Improvement Act of 1998 allowed a

phase-in period. Without alternative uses of manure and cost effective replacements for this soon-to-be lost organic fertilizer, tremendous harm will come to the state of Maryland without improving the environment.

Respectfully yours,

A handwritten signature in black ink, appearing to read "Harry R. James Jr.", with a long, sweeping horizontal stroke extending to the right.

Harry R James Jr
Salisbury Md



Earl Hance, MDA-earl.hance@maryland.gov

OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Ilardi, Kevin <Kevin.Ilardi@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Tue, Nov 12, 2013 at 8:37 AM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Kevin J. Ilardi

Berlin, Maryland



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

howard long <howlong@mstar.net>
To: Earl.Hance@maryland.gov

Tue, Nov 12, 2013 at 8:56 AM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its

results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Howard Long

Salisbury, MD



Earl Hance to Secretary of Agriculture

OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Kruchko, Donovan <Donovan.Kruchko@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Tue, Nov 12, 2013 at 8:59 AM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Thanks,

Donovan

Monroe, NC

Donovan Kruchko

Director of Sales

Perdue Foods

Offc: 704.225.8001 || Mbl: 704.661.4342

donovan.kruchko@perdue.com



This communication, including attachments, may contain confidential, privileged, copyrighted or other legally protected information. If you are not the intended recipient, you are hereby notified that any use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please immediately re-send this communication to the sender and delete the original message and any copy of it, including all attachments, from your computer system.



Opposition to the Nutrient Management / Phosphorous Management Tool

Peters, Robert <Robert.Peters@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>
Cc: "Schwalb, Steve" <Steve.Schwalb@perdue.com>

Tue, Nov 12, 2013 at 8:59 AM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Bob Peters, Salisbury MD, 21801



Earl Hance - MDA - Secretary Hance

Opposition to proposed Maryland phosphorus management tool

mark.passen.mp@gmail.com <mark.passen.mp@gmail.com>

Tue, Nov 12, 2013 at 9:24 AM

To: earl.hance@maryland.gov

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

- (1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;
- (2) Tested and proven plans are in place to deal with the excess organic fertilizer;
- (3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;
- (4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Mark Passen
Parsonsborg, MD 21849



MARYLAND

FW: CALL TO ACTION: SUBMIT A MESSAGE IN OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Wootten, Curtis <Curtis.Wootten@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Tue, Nov 12, 2013 at 9:25 AM

This is Curtis Wootten at Perdue-I am very concerned about the negative effect this will have on my job and many others!!!

From: Perdue Corporate Communications
Sent: Monday, November 11, 2013 3:43 PM
Subject: CALL TO ACTION: SUBMIT A MESSAGE IN OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION
Importance: High

Perdue Associate;

The Maryland Department of Agriculture (MDA)'s proposed Nutrient Management-Phosphorous Management Tool (PMT) regulation will allow the State of Maryland to determine how and when farmers – including poultry growers – can apply phosphorous to their fields.

The proposed regulation will have a significant impact on all poultry growers and their families, and all those who are supported by agriculture across Delmarva.

At Perdue, we believe that there is no practical, realistic, sufficient and timely plan proposed by this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT. Nor do we believe that MDA is providing those who will be impacted by the regulation sufficient time to evaluate its effect on their businesses and develop workable alternatives.



The Honorable Earl R. Hance, Jr., Governor

PMT Regulation being proposed

Sperry, Marc <Marc.Sperry@perdue.com>

Tue, Nov 12, 2013 at 9:35 AM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Mr. Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland, and I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my opinion that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge and potentially devastating.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like-minded voters across Maryland, firmly request that the implementation of this regulation be put on hold until:

- (1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;
- (2) Tested and proven plans are in place to deal with the excess organic fertilizer;
- (3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;
- (4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to

adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration

Marc Sperry
Business Development Manager
Perdue Farms, Inc.
31149 Old Ocean City Rd.
Salisbury, MD. 21804

(410)-543-3542 - Direct

(410)-341-5109 - Fax

(443)-523-0080 - Cell

This communication, including attachments, may contain confidential, privileged, copyrighted or other legally protected information. If you are not the intended recipient, you are hereby notified that any use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please immediately re-send this communication to the sender and delete the original message and any copy of it, including all attachments, from your computer system.



PHOSPHOROUS MANAGEMENT TOOL REGULATION --Need to find a win-win solution

PHOSPHOROUS MANAGEMENT TOOL REGULATION --Need to find a win-win solution

PHOSPHOROUS MANAGEMENT TOOL REGULATION --Need to find a win-win solution

Mitzi Perdue <mitzi@bhealthy.com>

Tue, Nov 12, 2013 at 9:42 AM

To: Earl.Hance@maryland.gov

Dear Sirs:

Everyone wants a clean Bay, but surely there are ways of accomplishing this that cause less pain to the farmers.

Could we come up with legislation that is effective but less damaging? I talk with many farmers, and I worry that the legislators may not fully realize the harm that they are causing and the importance of finding win-win solutions.

Sincerely,

Mitzi Perdue

Former President, American Agri-Women



PMT Regulations

bowlingtrucking@aol.com <bowlingtrucking@aol.com>

Tue, Nov 12, 2013 at 9:51 AM

To: earl.hance@maryland.gov

Dear Secretary Hance,

I am a crop farmer who lives in Charles County and I am extremely concerned about the Maryland Department of Agriculture's proposed regulation to the Phosphorus Management Tool.

My primary concern is that the proposed regulation is based on incomplete research. The University of Maryland researchers have stated that their research is not done, yet the state is moving forward at breakneck speed for what appears to be political reasons. Please slow this down! Allow the scientific research to be completed and then allow an orderly phase-in. Without alternative uses of manure and cost effective replacements for this soon-to-be lost organic fertilizer, tremendous harm will come to the State of Maryland and you still will not have improved the environment.

Jennifer Bowling
Charlotte Hall, Maryland



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Kent Dennis <kentdennis01@aol.com>

Tue, Nov 12, 2013 at 10:04 AM

To: Earl.Hance@maryland.gov

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

- (1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;
- (2) Tested and proven plans are in place to deal with the excess organic fertilizer;

- (3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;
- (4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Kent Dennis
Willards, MD



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Swiger, Brittany <Brittany.Swiger@perdue.com>

Tue, Nov 12, 2013 at 10:09 AM

To: "jo.mercer@maryland.gov" <jo.mercer@maryland.gov>, "earl.hance@maryland.gov" <earl.hance@maryland.gov>

Good Morning,

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / PMT regulation recently proposed by the MDA. I support the continued restoration of the Chesapeake Bay, and I am familiar with the issues that arise due to spreading litter in the watershed; however, the agriculture industry has made significant progress on the Chesapeake Bay Model. I also recognize that restoring the bay will take continued collective efforts by all of us. The PMT is a work in progress and its impact on Maryland's farm families and the industries behind them has not been fully determined. Without time to adjust, the economic livelihood as well as the economy of the state could be negatively impacted.

Please find attached my letter concerning the possible PMT regulations that may occur in the near future. Thank you for your consideration and have a nice Tuesday!

Brittany Nicholle Swiger

Perdue Farms

Heritage Breeders

Pocomoke Complex

Cell (443)735-5285

This communication, including attachments, may contain confidential, privileged, copyrighted or other legally protected information. If you are not the intended recipient, you are hereby notified that any use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please immediately re-send this communication to the sender and delete the original message and any copy of it, including all attachments, from your computer system.

 PMT Letter 2013.docx

November 12, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S. Truman Parkway
Annapolis, Maryland 21401

Dear Dr. Mercer:

I am a farm manager for Perdue's breeder department who lives in Worcester County and I am extremely concerned about the MDA's proposed regulation related to the Phosphorus Management Tool (PMT).

My first fear is that the proposed regulation, which will have huge impacts on the state's agricultural community, is based on incomplete research. The University of Maryland researchers have stated that their work is not done, yet the state is moving forward at breakneck speed. Rather than being focused on how to support and improve the agricultural community, the department seems more concerned with appeasing the U.S. EPA. If the farming sector in Maryland was lagging in achieving Chesapeake Bay Watershed Implementation Plan goals, then perhaps enhanced efforts would be needed, but we are at 130% of the goal. That's a huge accomplishment that seems to be lost on Governor O'Malley, the MDA and the EPA.

Allowing an extended and orderly phase-in of the implementation date of the PMT will cause little environmental harm. For decades, the scientific and regulatory community told farmers not to worry about applications of phosphorus (P) to the soil because unless the soil moved, the P would not move. Recently, that thinking changed and farmers began applying manures based upon their P content. The P levels in soils and waters were achieved over decades and will not be corrected for decades, even if this new regulation changes manure application procedures in 2015. Waiting a few more years to allow for an orderly phase-in will cause little harm to our environment. An orderly phase-in will allow the agricultural community to adjust and make required changes. Additionally, we saw firsthand how difficult and time consuming it was for Maryland CAFO farmers to obtain a Comprehensive Nutrient Management Plan and to think the conservation districts, the University of Maryland Extension, and/or private consultants can do enough side-by-side PSI/PMT comparisons in 2014 to provide valid results, does not seem feasible.

Here are some of my concerns about the near-immediate implementation of this regulation. First and foremost, how can the MDA think about proposing a regulation that could cause such financial hardships on farm families when no meaningful economic impact analysis has been done?

Chicken Farms

- Denied the ability to use manure, a locally produced organic fertilizer, on their own crops, some chicken farmers will have to buy commercial fertilizer to replace chicken

manure they already own. That will have a negative economic impact on the chicken growers.

- Chicken growers who have been selling their manure to other farmers may no longer have customers, thus a loss of income.
- Chicken growers who have had their chicken houses cleaned with manure removed from the farm without charge may now have to pay somebody to clean the houses and transport the manure since the cleaning/transporting company may not be able to sell the manure to make a profit and cover the costs of cleaning/transporting.
- Even if the MDA establishes the state storage sites, it will be the chicken growers' responsibility to transport the manure to the site, possibly creating a cost for the chicken growers.
- If the value of manure is lost, then alternative use companies might start charging a fee to accept manure, much like a landfill charges for disposal. If any alternative use companies start operating, and nothing of any magnitude appears to be on the horizon, they might charge a disposal fee instead of buying manure or accepting it for free.

Crop Farmers

- Denied the ability to use manure on their crops, crop farmers will have to buy commercial fertilizer to replace chicken manure that they have been using.
- Crop farmers who have used manure and not commercial fertilizers may have to buy or rent commercial fertilizer application equipment, thus raising their costs of doing business.
- Crop farmers wanting to hire a fertilizer applicator might find that there are not enough applicators or equipment in the short fertilizer application period to allow timely fertilizer applications. Increased demand in services will allow these applicators to raise their fees, thus higher costs for crop farmers.
- While commercial fertilizer will help a crop grow, the micronutrients and organic material in animal manure will help grow a larger crop. If yields are lessened due to the loss of organic material and micronutrients, then farmer income will diminish.
- Crop farmers and chicken farmers alike will most likely have to alter their business plans in ways that weaken their ability to withstand adverse growing conditions and/or markets – requiring new expenditures/capital purchases while at the same time artificially reducing their potential yields.
- Crop farmers could see increased effects of drought on their crops as a result of losing poultry litter's organic material that helps build up the soil's moisture retaining capabilities.

Once this regulation is in effect, as it appears it will be and contrary to the wishes of many in the agricultural community, there will be many negative effects to the farming community, individuals like me, and the entire state of Maryland without noticeable improvements in water quality.

Please, slow this down. Allow the scientific research to be completed and then allow an orderly phase-in period. Without alternative uses of manure and cost effective replacements for this soon-to-be lost organic fertilizer, tremendous harm will come to the state of Maryland.

Thank you so much for your consideration and time, Dr. Mercer.

Sincerely,

Brittany Nicholle Swiger
Farm Manager, Heritage Breeders
Perdue Farms
Pocomoke City, MD



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Wallace, Bill <Bill.Wallace@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Tue, Nov 12, 2013 at 10:11 AM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its

results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

William E. Wallace

Salisbury MD 21801



Earl Hance - MDA - Department of Agriculture

Opposition to proposed Maryland phosphorous Management Tool

Brasher, Chris <Chris.Brasher@perdue.com>

Tue, Nov 12, 2013 at 10:25 AM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance:

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Chris Brasher

Woodstock, Georgia



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Wendy MacKinnis <wendypeach@gmail.com>
To: Earl.Hance@maryland.gov

Tue, Nov 12, 2013 at 10:31 AM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

- (1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;
- (2) Tested and proven plans are in place to deal with the excess organic fertilizer;

- (3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;
- (4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Wendy MacKinnis
Seaford, DE



(no subject)

Gordy, Gary <Gary.Gordy@perdue.com>

Tue, Nov 12, 2013 at 10:56 AM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Cc: "Schwalb, Steve" <Steve.Schwalb@perdue.com>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

- (2) Tested and proven plans are in place to deal with the excess organic fertilizer;
- (3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;
- (4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Gary Gordy

Salisbury Maryland



Fwd: CALL TO ACTION: SUBMIT A MESSAGE IN OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Kelly Ewell <cabanagal67@aol.com>

Tue, Nov 12, 2013 at 11:01 AM

To: "earl.hance@maryland.gov" <earl.hance@maryland.gov>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request

that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Kelly Ewell
Berlin, Maryland

This communication, including attachments, may contain confidential, privileged, copyrighted or other legally protected information. If you are not the intended recipient, you are hereby notified that any use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please immediately re-send this communication to the sender and delete the original message and any copy of it, including all attachments, from your computer system.



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION.

Ingraham, Greg <Greg.Ingraham@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>
Cc: "Schwalb, Steve" <Steve.Schwalb@perdue.com>

Tue, Nov 12, 2013 at 2:58 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Greg Ingraham

Cell: 443-366-5015

405

**MARYLAND**

OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Janek, Ken <Ken.Janek@perdue.com>

Tue, Nov 12, 2013 at 12:01 PM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

- (1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;
- (2) Tested and proven plans are in place to deal with the excess organic fertilizer;
- (3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;
- (4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Ken Janek

Berlin, Maryland



Earl Hance 1203-400-1111

OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION.

Walston, John <John.Walston@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Tue, Nov 12, 2013 at 12:09 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

- (1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;
- (2) Tested and proven plans are in place to deal with the excess organic fertilizer;
- (3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;
- (4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

John D Walston Sr.

Salisbury MD.

This communication, including attachments, may contain confidential, privileged, copyrighted or other legally protected information. If you are not the intended recipient, you are hereby notified that any use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please immediately re-send this communication to the sender and delete the original message and any copy of it, including all attachments, from your computer system.



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Gea Ayala <gea@tripsite.com>
To: Earl.Hance@maryland.gov

Tue, Nov 12, 2013 at 12:51 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Gea Ayala

Salisbury, MD



Opposition to Proposed Maryland Phosphorous Management Tool Regulation

Adamson, Michael <Michael.Adamson@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Tue, Nov 12, 2013 at 1:35 PM

Dear Secretary Hance;

Like most of my friends and neighbors, my family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record **in opposition to** the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until:

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration.

Mike Adamson

Ocean City, MD



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Phillips, Carol <Carol.Phillips@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Tue, Nov 12, 2013 at 1:58 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its

results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Carol Phillips

Salisbury, Maryland



(no subject)

Beaton, George <George.Beaton@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Tue, Nov 12, 2013 at 4:09 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

George Betton

Salisbury, MD



Opposition To Proposed Maryland Phosphorous Management Tool Regulation

Garth, Mark <Mark.Garth@perdue.com>

Tue, Nov 12, 2013 at 7:03 PM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland and I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture. It is my view that it is premature to issue such guidelines before the science that is used as the basis for such regulation is validated, the economic impact of the regulation on all impacted parties is fully understood and a viable, practical solution for dealing with the resulting excess fertilizer is identified and put into place. To implement the regulation without those matters properly resolved would be reckless and cause irreparable harm to the Maryland economy and many of its citizens that we depend upon to provide jobs and economic growth.

Accordingly, I, along with like voters across Maryland, respectfully request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

I care deeply about the environment and fully support efforts to protect our natural resources, including the continued restoration of the Chesapeake Bay. However, we must do this responsibly and we must do it together. Making sure that the full impact of any decisions are understood before they are implemented is the obligation of prudent governance. Please make sure that the future of our state is not sacrificed on the altar of expediency.

Thank you for your consideration!

Mark Garth

Salisbury, Maryland

This communication, including attachments, may contain confidential, privileged, copyrighted or other legally protected information. If you are not the intended recipient, you are hereby notified that any use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please immediately re-send this communication to the sender and delete the original message and any copy of it, including all attachments, from your computer system.

412

MARYLAND

Subject: New Phosphorus PMT test

New Phosphorus PMT test

Mike Knauer <christian4804@yahoo.com>

Tue, Nov 12, 2013 at 10:18 PM

Reply-To: Mike Knauer <christian4804@yahoo.com>

To: "Earl.Hance@MARYLAND.GOV" <Earl.Hance@maryland.gov>

I have grown up on the farm that I am now operating. We are three years from being able to apply for a Maryland Century Farm. I hope that we are still in business then, as I would like to pass on the farm to my son to operate someday. Not just a sign reminding him what his father, grandfather and great grandfather that he never met did for the past 100 yrs. I'm not totally against what the state of Maryland is doing but hows its going about it. To my understanding the implementation on the new PMT test is a year behind of when it was to go into effect. The new Chesapeake Bay model isn't due for a change til 2017. What I don't understand is why hasn't there been as rush study on the bay model done to backup the the new PMT test implementation. I'm not sure when the Bay model was last updated but to me it would make sense to not base new test on old data. When we do soil test our test are no more than two years old to the date we consult our Agronomist about nutrient application for the year. How close is the Bay model date to the current date. It is impossible to implement new rules on out dated data.

As the population grows we are suppose to increase supply to feed the country. How can we do this if our soils are depleted and not producing yeild due. The business losses profit and goes out of business and the state is out income tax. If the chicken farmer can't get rid of the manure then he is out of business. If he goes out of business then they don't need the farmer to supply grain for chicken feed.

We have been a no-till farm for the past ten years and we don't plan on changing anytime soon. We recently have started using manure on our farm per recomendation from nutrient managment plan. We have seen great resposnes in yeilds this past year and are currently doing soil samples for the new plan being done. My father asked why our fertlizer bill was half of years past and I told him because we only used commercial fertilizer on the wheat crop. We used manure on the remainder acres at a third of the cost of man made fertilizer. We do what ever we can to save money on the farm but what we don't do is depleat our soil that supports our family business. That means over fertilizing when the plants or soil can't hold it.

You come from a farming family back ground and would think you would understand what all the fuss is about. I also know that people change. Money and power can change people and not always for the better. In the meeting I attended you got tired of hearing Maryland compared to Delaware. Why don't the states in the Chesapeake Bay water shed work together instead of apart like a chess match. Last time I looked shit ran down hill. It's the goverments normal deal. "Over do it now and worry about the impact when its to late to repair the damage."

Well you to can't make a mark in history "The Farming History in Maryland" just as Obama is making his mark in history as being " The Preisident that BROKE the Country"

Thank you for your time.

LONG FUTURE FARMER



Proposed PMT regulations

Airey, Ronald <Ronald.Airey@perdue.com>

Tue, Nov 12, 2013 at 3:12 PM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Ron Airey

Salisbury, MD

RECEIVED

NOV 12 2013

OFFICE OF THE SECRETARY

414
Secretary Hance,

My family operates a small poultry and grain operation near Federalsburg, Maryland. I attended the informational meeting in Easton. I did not speak, but listened intently to both sides. I have to say, the Department of Agriculture answered many of the inquiries with "we are aware of that and are working on it" or....."that something we are considering". I was surprised that your department was not better prepared to implement this regulation.

Much was discussed about the cost share for manure transport, especially for the lower shore counties. You were adamant this program would have increased funding to handle the increased need. However, the "need" will increase greatly with this new index, to the point that existing haulers will be overwhelmed. Add to this the cumbersome payment procedures and you have the beginnings of a nightmare scenario.

You also discussed the alternative uses for poultry manure. Right now on the shore, Perdue Farms offers the only large scale alternative use for manure. You mentioned a startup program in one of the lower shore countries that will extract nutrients from manure. But this facility is not online and once it is, it will have very limited capacity.

Today I read an article about the Delaware Department of Agriculture taking a slower, more calculated approach to the phosphorus issue. They are looking at the possible alternative processes, but more importantly, maintaining a balance with the

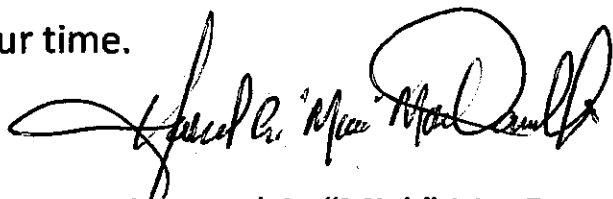
viability and profitability of the agricultural community. I would suggest this direction for our Department of Agriculture.

Our farm has been recognized by the State of Maryland as a Cooperator of the Year for Caroline County (...in fact, you presented us with the award). We have spent a great deal of money to design our poultry production area to comply with state/federal guidelines for storm water management and proper manure management. We have utilized cost share monies for heavy use pads, PLT usage and a manure structure. We have installed buffers around our poultry houses and fields. We have always been a responsible farming operation.

Secretary Hance, we feel this new regulation needs a longer implementation period. An economic impact study should be completed to look at the extensive financial impact on the farming community. Additionally, real and viable alternatives for manure have to be in place prior to the implementation of the regulation. In short, you are moving forward on a plan that the true cause and effect is not widely known.

I hope you consider all of our concerns. We would like to pass our operation on to our son, but only if the future of agriculture in Maryland is allowed to be profitable.

Thank you for your time.

A handwritten signature in black ink, appearing to read "Howard A. 'Mick' MacDonald". The signature is fluid and cursive, with a large loop at the end.

Howard A. "Mick" MacDonald

Smithville View Farm LLC
6158 Todd Rd.
Federalsburg, Md. 21632

Smithville View Farm LLC

415

November 5, 2013

RECEIVED

Secretary Earl D. Hance
Maryland Department of Agriculture
50 Harry S Truman Parkway
Annapolis, Maryland 21841

NOV 12 2013

OFFICE OF THE SECRETARY

Dear Secretary Hance:

I am a poultry and grain crop farmer who lives in Caroline County, MD and I am extremely concerned about the Maryland Department of Agriculture's proposed regulation related to the Phosphorus Management Tool.

My first fear is that the proposed regulation, which will have huge impacts on the state's agricultural community, is based on incomplete research. The University of Maryland researchers have stated that their work is not done, yet the state is moving forward at breakneck speed for what appears to be political reasons. Rather than being focused on how to support and improve the agricultural community, the department seems more concerned with appeasing the U.S. Environmental Protection Agency. If the farming sector in Maryland was lagging in achieving Chesapeake Bay Watershed Implementation Plan goals, then perhaps enhanced efforts would be needed, but as you have stated, we are at 130% of the goal. That's an accomplishment that seems to be lost on Governor O'Malley, the Maryland Department of Agriculture, and the EPA.

Allowing an extended and orderly phase-in of the implementation date of the Phosphorous Management Tool will cause no environmental harm. For decades, the scientific and regulatory community told farmers not to worry about applications of phosphorus to the soil because unless the soil moved, the phosphorus would not move. Recently, that thinking changed and farmers began applying manures based upon their phosphorus content. The phosphorus levels in soils and waters were achieved over decades and will not be corrected for decades, even if this new regulation changes manure application procedures in 2015. Waiting a few more years to allow for an orderly phase-in will not cause any harm to our environment. An orderly phase-in will allow the agricultural community to adjust and make required changes. Additionally, we saw firsthand how difficult and time consuming it was for Maryland CAFO farmers to obtain a Comprehensive Nutrient Management Plan and to think the conservation districts, the University of Maryland Extension, and/or private consultants can do enough side-by-side Phosphorus Site Index/Phosphorus Management Tool comparisons in 2014 to provide valid results does not seem feasible.

Here are some of my concerns about the near-immediate implementation of this regulation. First and foremost, how can the Department of Agriculture even think about proposing a regulation that could cause such financial hardships on farm families when no meaningful economic impact analysis has been done?

Chicken Farms

- Denied the ability to use manure, a locally produced organic fertilizer, on their own crops, some chicken farmers will have to buy commercial fertilizer to replace chicken manure they already own. That will have a negative economic impact on the chicken growers.
- Chicken growers who have been selling their manure to other farmers may no longer have customers, thus a loss of income.
- Chicken growers who have had their chicken houses cleaned with manure removed from the farm without charge may now have to pay somebody to clean the houses and transport the manure since the cleaning/transporting company may not be able to sell the manure to make a profit and cover the costs of cleaning/transporting.

- Even if the MDA establishes the state storage sites, it will be the chicken growers' responsibility to transport the manure to the site, possibly creating a cost for the chicken growers.
- If the value of manure is lost, then alternative use companies might start charging a fee to accept manure, much like a landfill charges for disposal. If any alternative use companies start operating, and nothing of any magnitude appears to be on the horizon, they might charge a disposal fee instead of buying manure or accepting it for free.

Crop Farmers

- Denied the ability to use manure on their crops, crop farmers will have to buy commercial fertilizer to replace chicken manure that they have been using.
- Crop farmers who have used manure and not commercial fertilizers may have to buy or rent commercial fertilizer application equipment, thus raising their costs of doing business.
- Crop farmers wanting to hire a fertilizer applicator might find that there are not enough applicators or equipment in the short fertilizer application period to allow timely fertilizer applications. Increased demand in services will allow these applicators to raise their fees, thus higher costs for crop farmers.
- While commercial fertilizer will help a crop grow, the micronutrients and organic material in animal manure will help grow a larger crop. If yields are lessened due to the loss of organic material and micronutrients, then farmer income will diminish.
- Crop farmers and chicken farmers alike will most likely have to alter their business plans in ways that weaken their ability to withstand adverse growing conditions and/or markets – requiring new expenditures/capital purchases while at the same time artificially reducing their potential yields.
- Crop farmers could see increased effects of drought on their crops as a result of losing poultry litter's organic material that helps build up the soil's moisture retaining capabilities.

Once this regulation is in effect, as it appears it will be and contrary to the wishes of many in the agricultural community, there will be many negative effects to the farming community, individuals like me, and the entire state of Maryland without noticeable improvements in water quality.

Please, slow this down, work closely with other surrounding states. Allow the scientific research to be completed and then allow an orderly phase-in much as the game-changing Water Quality Improvement Act of 1998 allowed a phase-in period. Without alternative uses of manure and cost effective replacements for this soon-to-be lost organic fertilizer, tremendous harm will come to the state of Maryland without improving the environment.

Respectfully yours,



Robert Schoonover
DBA 2 Cool Farm
Greensboro, MD

Bobby & Katie Schoonover
26543 Whiteleysburg Road
Greensboro, MD 21639

416

RECEIVED

NOV 12 2013

November 7, 2013

OFFICE OF THE SECRETARY

Dear Mr. Hance,

The new Phosphorus management tool is going to have a negative impact on my poultry farm. I am what is referred to as a "no land generator", meaning I produce manure but do not land-apply to my farm. Therefore, my family and I are dependent upon someone to clean out and transfer manure to my storage shed or haul away to use as organic fertilizer. I have an agreement with a local grain and truck crop farmer. Chances are good if you traveled to the beach you stopped at his modern fruit stand with an amazing selection of delicious Maryland grown fruits and vegetables. There is no cash exchanged with my current arrangement. He cleans and or crusts out the houses for the value of the organic fertilizer.

If the land he applies my manure to is not allowed to have organic fertilizer applied because of "P" greater than 150, then he will not be allowed to take it and therefore I am left to search for another suitor. The U of MD brief study states that 80% of the lower shore land will not be available. If this happens, the value of my organic fertilizer will become worthless and in fact cost me a significant amount of money to have my houses crusted.

My farm is fairly typical of most, especially those that opt to grow in a large bird program and produce five flocks on average per year. The terms of my loan necessitate that I make four quarterly payments. The significance of the fifth flock is that flock allows me to reinvest in the farm or other options with my grower pay. If I must now pay for the crusting out of all five flocks I will lose 30-40% of my cash flow that will now go towards clean outs. Another scenario would be if I had to wait to clean out, my down time between flocks will increase resulting in losing the important fifth flock. The results to my cash flow would be the same, disastrous.

I'm in the process of obtaining permits for two additional houses. However, with this new "P" tool in the works and its potential negative impact on poultry and crop farming I'm putting that on hold indefinitely. No intelligent grower would move forward with this much uncertainty about poultry and crop farming in Maryland.

I ask you to please reconsider your position on the "P" tool standard. Thank you for your time and consideration.

Sincerely,



Kimber & Kim Ward
New Direction Farm
27839 Rockawalkinridge Road
Salisbury, Md. 21850
803-580-9787

417

COMMISSIONERS FOR SOMERSET COUNTY

11916 SOMERSET AVENUE, ROOM 111
PRINCESS ANNE, MARYLAND 21853
TELEPHONE 410-651-0320, FAX 410-651-0366

COMMISSIONERS

REX SIMPKINS, PRESIDENT
CHARLES F. FISHER, VICE-PRESIDENT
CRAIG N. MATHIES, SR.
RANDY LAIRD
JERRY S. BOSTON



COUNTY ADMINISTRATOR-CLERK
RALPH D. TAYLOR

COUNTY ATTORNEY
KIRK G. SIMPKINS

November 1, 2013

RECEIVED

NOV 1 2 2013

OFFICE OF THE SECRETARY

Secretary Earl F. Hance
Maryland Department of Agriculture
50 Harry S. Truman Parkway
Annapolis, MD 21401

Re: Opposition to new Phosphorous Management Tool
For Nutrient Management

Dear Secretary Hance:

Recently the Somerset County Commissioners were made aware of the proposed Phosphorus Management Tool plan for nutrient management, as proposed by the Maryland Department of Agriculture. It is with great concern that we write to you today. This regulation will have a severe negative impact on Somerset County and serve a devastating blow to the already fragile agricultural community. With agriculture being the number one leading industry in Somerset County, you should understand our concerns. Therefore, we strongly oppose the adoption of this (PMT) policy.

We certainly understand the importance of being good stewards of the land, and also understand the importance of balanced regulations. We urge you to reconsider this proposal and look into the impact this regulation will impair on Somerset and its surrounding counties.

Sincerely,

Rex Simpkins
President
Somerset County Commissioners

"Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorous Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard." Kevin Anderson - President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

I HOPE THAT YOU & THE GOVERNOR WILL RE CONSIDER YOUR PLACING NEW RESTRICTIONS ON FARMERS THROUGH THE NEW PMT TOOL. BESIDES THE FACTS THAT YOUR DEPT. DOESN'T KNOW HOW MUCH LITTER WILL BE MOVED, WHERE IT WILL GO, HOW MUCH IT WILL COST, OR HOW IT WILL AFFECT LOCAL FARMERS AND ECONOMIES, THE "EXPERTS" AT U. OF MD. DON'T KNOW IF IT WILL DO ANYTHING TO CLEAN UP THE BAY. I KNOW THAT THE GOV. NEEDS TO MAKE POINTS WITH THE ENVIRONMENTAL CROWD DURING HIS RUN-UP TO THE PRESIDENTIAL NOMINATION, BUT HE NEEDS TO UNDERSTAND THAT HIS RECEPTION IN THE FARMING STATE OF IOWA WILL BE LESS THAN CORDIAL WHEN THEY FIND OUT HOW HE TREATS 'HIS' FARMERS IN MD. FARMERS HAVE ALREADY EXCEEDED THEIR GOALS ON BAY CLEANUP. CITY VOTERS IN ? S. BALTIMORE CITY & CO, MONT. AND P.G. COUNTIES NEED TO MEET THEIRS NOW.

RECEIVED

NOV 12 2013

Sincerely,
Name: JOHN TAYLOR JR
Address: 10304 CALEB RD
BERLIN MD. 21811
Phone: 410-251-6362
Email: JOHNAJESU @ AOL. com.

418

OFFICE OF THE SECRETARY
Our Farms, Our Future

419

RECEIVED

November 6, 2013

NOV 12 2013

Secretary Hance
Maryland Department of Agriculture
50 Harry S. Truman Parkway
Annapolis, MD 21401

OFFICE OF THE SECRETARY

Dear Secretary Hance,

I am writing to express my thoughts on the Phosphorous Management Tool regulation. The regulation is based on incomplete, inconclusive and contradictory science. It was promulgated to satisfy the WIP, which was based on the TMDL which was derived from the Chesapeake Bay Model. The Bay Model uses many, now proven incorrect, assumptions, notably the amount and nutrient content of chicken litter.

Agriculture has improved the use of nutrients over the past 30 years and more can be done. But it has to be in a scientifically proven, economically viable way – this regulation is neither. There needs to be flexibility in the tool for naturally high P soils, for potatoes and vegetable crops which require higher available and starter P, for dairy farms which cannot transport liquid organic fertilizer long distances, and for organic farms which by definition have to use organic fertilizer. There also needs to be operating alternative uses for organic fertilizer which, very importantly, also maintains the value – in other words which pays enough to replace the current value not just someplace to take it. An economic impact study needs to be completed to show the costs of this regulation in relation to proven benefits in water quality which at this time I believe are either uncertain or unknown entirely.

The PMT regulation needs to be withdrawn and reworked with these items in mind:

- A. Bay model is re run in 2017 with more accurate assumptions to show what needs to be accomplished
- B. Better, more accurate and replicated science has been completed to quantify the benefits of the PMT and that operating under it will not affect crop yields
- C. Operating alternative uses for organic fertilizer that maintain the value
- D. Flexibility is built into the regulation for instances where it is not economically or agronomically feasible to adhere to the PMT
- E. Economic impact study/ cost benefit analysis
- F. Allow the farm community time to adjust their business plans to accommodate new requirements

This is the most contentious issue I have seen in 27 years working with farmers. The regulation has to be withdrawn.

Sincerely,



Andrew L. McLean 2815 Ruthsburg Rd, Centreville, MD 21617 410-310-4232

RECEIVED

NOV 12 2013

11-6-13

OFFICE OF THE SECRETARY

420
Dear Secretary Hance,

We farm 352 acres in Dorchester County. We also own & operate four poultry houses. It appears at this time that if the PMT goes into effect, we will need to purchase commercial fertilizer for $\frac{3}{4}$ of our farmland. This will be a definite economic hardship for us. Up until now we have been able to use "our" chicken manure within "our" Nutrient Management Plan as fertilizer for our crops.

No valid plans have been made by MDA to transport and store manure produced on the Eastern Shore. A viable system needs to be in place before implementing the PMT.

Political aspirations and implications need to be eliminated from any determination of when and if the PMT is implemented.

All information needs to be gathered from all sources of pollution, from all areas whose rivers flow into the Chesapeake.

Please be very deliberate and do the right things, at the right time, for the right reasons. We are depending on you to defend & support Maryland farmers.

Sincerely,
Patricia Wheedleton

Name - Patricia Wheedleton

Address: 26955 LINE RD,

SEAFORD, DE. 19973

Phone: 302-629-7414 Cell# - 410-430-7318

Patricia A. Wheedleton

T. Harry Wheedleton
26955 Line Rd.
Seaford, DE 19973-4637

"Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorous Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard." Kevin Anderson - President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

11/6/13

Dear Secretary Hance:

The PMT should be postponed until current, accurate, scientific research is in place to determine how MDA should proceed on this issue. When we have ^{more} information, phosphorus use determination and the use of chicken manure should be re-evaluated. Then and only then should "effective" regulations be put in place. Since the current Chesapeake Bay Model is based on 10 yr. old data, this also needs to be updated with current statistical information. Putting the PMT in use now without an economic study on how this will effect our farms, the counties on the Eastern Shore and the economy of MD. as a whole, goes against good common sense. Please do not implement PMT prematurely.

We farm 352 acres in Dorchester County.

Sincerely, T. Harry Wheedleton

RECEIVED

Name: T. HARRY WHEEDLETON

Address: 26955 LINE RD,

SEAFORD, DE. 19973

Phone: 302-629-7414 Cell # 410-422-1993

Email: _____

421

Our Farms, Our Future

"Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorous Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard." Kevin Anderson - President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

Agriculture is a Science. This PMT regulation is a political tool to cater to the environmental community. Poultry litter is an organic, slow release nutrient source, that is much more stable than commercial fertilizers. The environmental community should embrace chicken manure, and support its use in a proper manner. Please take the politics out of Agriculture, and let Science determine the way we produce food.

RECEIVED

Sincerely,
Name: Danny Seathoff, Seathoff Inc
Address: 11830 Ridgely Rd
Ridgely, MD 21660
Phone: 410 634-2899
Email: _____

422

Our Farms, Our Future

"Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorous Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard." Kevin Anderson - President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

Please don't put my Family farm
out of Business w/ this unfair regulation!

RECEIVED

NOV 12 2012

OFFICE OF THE SECRETARY

Our Farms, Our Future

Sincerely, H. S. Waller
Name: H. Spencer Waller
Address: P.O. Box 89
DVAUTICA, MD 21856
Phone: 410-223-4111
Email: Spencer@orionwildlife.com

423

"Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorous Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard." Kevin Anderson - President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

AS A Veg Farmer and chicken grower on the shore I feel that the new Regulations will be a burden on my operation and not good for my crops. All the Bay Regulations have already added enough cost to this operation. Even with cost share programs I still have to spend more money. Already it is so hard to use manure on many veg fields such as melons and lops to keep cost down. We use manure on grain crops and sweetcorn taking that away puts me at a vaneely disadvantage from states not requiring this. Also we grow chickens for perdue farm and I think if we keep driving their cost up sooner or later they will move from here and grow birds werea cheaper Else where

RECEIVED

Sincerely,

Name: Robert Warm
Address: 23050 Hog Creek Rd
Preston Md 21655
Phone: 410 310 9461
Email: _____

NOV 12 2013

OFFICE OF THE SECRETARY

Our Farms. Our Future

424

"Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorous Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard." Kevin Anderson - President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

You don't seem to be the Maryland farmer that I expected. You should really support the farming industry. It looks as though you don't support us at all. I'm not sure that you really know the answers that we in farming wanted to hear.
Chickens are helping with our cash flow. Selling our chicken manure isn't going to help us in making payments. ~~Real~~ Machinery, chemicals, fertilizers, seeds and fuel are eating farmers income up.
Let's see a big change from you + yours truly!

Sincerely,
Name: Dan Southall
Address: 10144 Conboy Rd
Easton MD 21601
Phone: 410-522-1378
Email: _____

NOV 12 2013

OFFICE OF THE SECRETARY

Our Farms. Our Future

425

"Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorous Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard." Kevin Anderson - President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

first thing Mr. Hance I am disappointed in you as a farmer been trying to push this mess down our throat. I think the farming community needs to stand up to MD, and do what we have been doing. Are you guys going to arrest us all. I have spent alot of money on G.P.S. New spreader and Cal. to try to spread manure. We grow chicken on our farm that has been in our family 108 yrs. We can't sell enough manure as you guys said to buy back corn, fertilizer. I don't intend to stop using manure.

RECEIVED

NOV 12 2013

OFFICE OF THE SECRETARY

Our Farms, Our Future

Name: Robert P. SAATHOFF SR
Address: 10144 CONDOVA RD
EASTON MD 21601
Phone: 410 822 1378
Email:

Sincerely

426

"Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorous Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard." Kevin Anderson - President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

I am a farmer and use chicken manure on my farm. I do not want to pollute our bay any more than anyone else. We all know that the farmer is the whipping boy for all of the industry and sewage treatment plants that have permits to dump in the tributaries and waterways. Maybe the answer to the problem is to issue permits to the farmers so that farm nutrients do have to have their own strong individual means and not a discharge pipe with a valve we could legally pollute too!

RECEIVED

NOV 12 2013

OFFICE OF THE SECRETARY

Our Farms, Our Future

Sincerely,
Name: George Windsor
Address: 5855 Mt Holly Rd
East New Market Md 21631
Phone: 410-953-7369
Email: _____

427

428

November 12, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S. Truman Parkway
Annapolis, Maryland 21401

Dear Dr. Mercer:

I am extremely concerned about the Maryland Department of Agriculture's proposed regulation related to the Phosphorus Management Tool.

My first fear is that the proposed regulation, which will have huge impacts on the state's agricultural community, is based on incomplete research. The University of Maryland researchers have stated that their work is not done, yet the state is moving forward at breakneck speed for what appears to be political reasons. Rather than being focused on how to support and improve the agricultural community, the department seems more concerned with appeasing the U.S. Environmental Protection Agency. If the farming sector in Maryland was lagging in achieving Chesapeake Bay Watershed Implementation Plan goals, then perhaps enhanced efforts would be needed, but as Secretary of Agriculture Hance has stated, we are at 130% of the goal. That's an accomplishment that seems to be lost on Governor O'Malley, the Maryland Department of Agriculture, and the EPA.

Allowing an extended and orderly phase-in of the implementation date of the Phosphorous Management Tool will cause no environmental harm. For decades, the scientific and regulatory community told farmers not to worry about applications of phosphorus to the soil because unless the soil moved, the phosphorus would not move. Recently, that thinking changed and farmers began applying manures based upon their phosphorus content. The phosphorus levels in soils and waters were achieved over decades and will not be corrected for decades, even if this new regulation changes manure application procedures in 2015. Waiting a few more years to allow for an orderly phase-in will not cause any harm to our environment. An orderly phase-in will allow the agricultural community to adjust and make required changes. Additionally, we saw firsthand how difficult and time consuming it was for Maryland CAFO farmers to obtain a Comprehensive Nutrient Management Plan and to think the conservation districts, the University of Maryland Extension, and/or private consultants can do enough side-by-side Phosphorus Site Index/Phosphorus Management Tool comparisons in 2014 to provide valid results does not seem feasible.

Here are some of my concerns about the near-immediate implementation of this regulation. First and foremost, how can the Department of Agriculture even think about proposing a regulation that could cause such financial hardships on farm families when no meaningful economic impact analysis has been done?

Chicken Farms

- Denied the ability to use manure, a locally produced organic fertilizer, on their own crops, some chicken farmers will have to buy commercial fertilizer to replace chicken manure they already own. That will have a negative economic impact on the chicken growers.
- Chicken growers who have been selling their manure to other farmers may no longer have customers, thus a loss of income.
- Chicken growers who have had their chicken houses cleaned with manure removed from the farm without charge may now have to pay somebody to clean the houses and transport the manure since the cleaning/transporting company may not be able to sell the manure to make a profit and cover the costs of cleaning/transporting.
- Even if the MDA establishes the state storage sites, it will be the chicken growers' responsibility to transport the manure to the site, possibly creating a cost for the chicken growers.
- If the value of manure is lost, then alternative use companies might start charging a fee to accept manure, much like a landfill charges for disposal. If any alternative use companies start operating, and nothing of any magnitude appears to be on the horizon, they might charge a disposal fee instead of buying manure or accepting it for free.

Crop Farmers

- Denied the ability to use manure on their crops, crop farmers will have to buy commercial fertilizer to replace chicken manure that they have been using.
- Crop farmers who have used manure and not commercial fertilizers may have to buy or rent commercial fertilizer application equipment, thus raising their costs of doing business.
- Crop farmers wanting to hire a fertilizer applicator might find that there are not enough applicators or equipment in the short fertilizer application period to allow timely fertilizer applications. Increased demand in services will allow these applicators to raise their fees, thus higher costs for crop farmers.
- While commercial fertilizer will help a crop grow, the micronutrients and organic material in animal manure will help grow a larger crop. If yields are lessened due to the loss of organic material and micronutrients, then farmer income will diminish.
- Crop farmers and chicken farmers alike will most likely have to alter their business plans in ways that weaken their ability to withstand adverse growing conditions and/or markets – requiring new expenditures/capital purchases while at the same time artificially reducing their potential yields.
- Crop farmers could see increased effects of drought on their crops as a result of losing poultry litter's organic material that helps build up the soil's moisture retaining capabilities.

Once this regulation is in effect, as it appears it will be and contrary to the wishes of many in the agricultural community, there will be many negative effects to the farming community, individuals like me, and the entire state of Maryland without noticeable improvements in water quality.

Please, slow this down. Allow the scientific research to be completed and then allow an orderly phase-in much as the game-changing Water Quality Improvement Act of 1998 allowed a

phase-in period. Without alternative uses of manure and cost effective replacements for this soon-to-be lost organic fertilizer, tremendous harm will come to the state of Maryland without improving the environment.

Respectfully yours,

ROUNDS ROAD FARM
Linda Candy
Pittoville, MD.



Earl Hance (486) 740-1100, ext. 2000

OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Bromley, Lynda <Lynda.Bromley@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Wed, Nov 13, 2013 at 7:01 AM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Lynda Bromley

Salisbury Md



Earl Hance 443-737-1000 x3000

Nutrient Management

Diniar, Michael <Michael.Diniar@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>
Cc: "Schwalb, Steve" <Steve.Schwalb@perdue.com>

Wed, Nov 13, 2013 at 7:09 AM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

- (1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;
- (2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Michael Diniar

Rehoboth Beach, DE

Thank you,

Michael Diniar

410-543-3430

This communication, including attachments, may contain confidential, privileged, copyrighted or other legally protected information. If you are not the intended recipient, you are hereby notified that any use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please immediately re-send this communication to the sender and delete the original message and any copy of it, including all attachments, from your computer system.



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Burns, Joe <Joe.Burns@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Wed, Nov 13, 2013 at 7:52 AM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Joe Burns

Salisbury, Maryland



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Graham, Gerard <Gerard.Graham@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Wed, Nov 13, 2013 at 7:59 AM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic consequences of this regulation to poultry growers, poultry integrators and their employees, grain farmers, and the many businesses supporting Maryland agriculture, is detrimental.

Additionally, in my view, there is no practical, realistic, sufficient, and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers, who are directly affected by this regulation, enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer.

I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed, and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In my case, through multiple generations. We recognize that this will take continued collective efforts by all of us. Please consider that Maryland agriculture has already made significant progress on the Chesapeake Bay Model; the PMT remain a work in progress. The program's effect on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Gerard Graham

Salisbury, MD



Please consider the environment before printing this e-mail.

This communication, including attachments, may contain confidential, privileged, copyrighted or other legally protected information. If you are not the intended recipient, you are hereby notified that any use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please immediately re-send this communication to the sender and delete the original message and any copy of it, including all attachments, from your computer system.



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Ewing, Denise <Denise.Ewing@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Wed, Nov 13, 2013 at 8:04 AM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Denise Ewing



(no subject)

Holden, Bel <Bel.Holden@perdue.com>

Wed, Nov 13, 2013 at 9:00 AM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Cc: "Schwalb, Steve" <Steve.Schwalb@perdue.com>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

THANKS,

BELAVEATE HOLDEN
POCOMOKE CITY, MD

This communication, including attachments, may contain confidential, privileged, copyrighted or other legally protected information. If you are not the intended recipient, you are hereby notified that any use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please immediately re-send this communication to the sender and delete the original message and any copy of it, including all attachments, from your computer system.



Nutrient management / PMT regulation proposed

M. Jean Walter <mjeanwalter@gmail.com>

Wed, Nov 13, 2013 at 9:25 AM

To: Earl.Hance@maryland.gov

Cc: steve.schwalb@perdue.com

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

- (2) Tested and proven plans are in place to deal with the excess organic fertilizer;
- (3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;
- (4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

M. Jean Walter
Marion, Maryland



(no subject)

Hensley, Vic <Vic.Hensley@perdue.com>

Wed, Nov 13, 2013 at 9:27 AM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Victor Hensley

Newark, Md.

[Earl Hance - 2013-11-13 9:55 AM](#)

The PMT regulations

Tam Pham <tphammutual@gmail.com>

Wed, Nov 13, 2013 at 9:55 AM

To: "Earl Hance@maryland.gov" <earl.hance@maryland.gov>

Dear secretary Hance:

My name is Tam Pham. I reside on 8830 Calloway rd Willards Md. I'm a chicken grower who live in Wicomico County, MD. I sincerely request you please slow this down. Allow the scientific research to be completed and then allow an orderly phase in much as the game-changing Water Quality Improvement Act of 1998 allowed a phase-in period. Without alternative uses of manure and cost effective replacement for this soon-to-be lost organic fertilizer, tremendous harm will come to the state of Maryland without improving the environment .

Respectfully yours,
Tam Pham



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Rites, Tina <Tina.Rites@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Wed, Nov 13, 2013 at 9:50 AM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Tina Rites

Berlin, Maryland



MFB Comments on PMT proposed regulation

Valerie Connelly <valeriec.mdfb@verizon.net>
To: Buddy Hance - MDA <earl.hance@maryland.gov>

Wed, Nov 13, 2013 at 10:10 AM



Maryland Farm Bureau, Inc.

8930 Liberty Road • Randallstown, MD 21133 • (410) 922-3426

November 12, 2013

The Honorable Earl F. Hance
Secretary of Agriculture
Maryland Department of Agriculture
50 Harry Truman Parkway
Annapolis, MD 21401

Re: Proposed Regulation to Adopt the Phosphorus Management Tool

By unanimous vote of the Board of Directors of the Maryland Farm Bureau, I am writing to oppose the adoption of the new Phosphorus Management Tool (PMT) at this time. If implemented, the PMT restrictions will dramatically limit the use of locally produced organic fertilizer to much of the land on the lower Eastern Shore and in many other areas of the State. This limitation will have far reaching negative economic impacts on individual poultry growers, dairymen, grain operators, support businesses and local communities.

Our members strongly believe that it makes no sense to impose this burden on farmers when at 130% we are the only sector to reach our Bay cleanup goals in the most recent analysis and are, in fact, doing more than our fair share.

The Clean Water Act, under which the TMDL WIP and state proposed pollution restrictions are imposed, intended to protect Agricultural businesses from unreasonable economic harm in any effort to achieve clean water status. This intent is evidenced by the agricultural stormwater exemption in the Act. While the PMT is not related to the stormwater exemption, it is an example of unreasonable economic harm that will arise if implemented as proposed.

We would like to point out that other state agencies have backed off when proposed water quality regulations are expected to have an unreasonable economic impact on businesses. The most recent example is the Accounting for Growth negotiation at the Maryland Department of the Environment. When the development community balked at paying \$30,000 per credit to offset Phosphorus in new development, the agency agreed that they would only have to address Nitrogen. In fact, they reasoned that as long as Nitrogen was addressed (at around \$3000 per credit) Phosphorus would be contained. Shouldn't the farm community, one of the largest economic drivers in the state, get the same consideration?

Additionally, we are concerned that replacing organic slow-release fertilizer with water-soluble chemical Nitrogen will have a much greater impact on the Bay. Chesapeake Bay Foundation agrees with this concern in their October 2013 Pennsylvania Fact Sheet entitled, "Manure: Not the Leading Cause of Nitrogen Pollution to the Chesapeake Bay." In it they emphasize that "in the case of nitrogen pollution, manure is not the leading source; rather, chemical fertilizers applied onto agricultural lands are the leading source of nitrogen pollution..." And since no study has been conducted to analyze the potential impact of switching from organic to chemical fertilizer, it is possible that the effort to address a perceived Phosphorous problem on farms will cause a new Nitrogen concern.

And we say "perceived Phosphorus" problem because we know that the Chesapeake Bay Model does not currently give credit for most of the phosphorus control measures we have already taken on Maryland farms. It is possible that once the model is corrected and the new numbers are run, Maryland farmers will have already met their Phosphorus reduction goals, without the need to implement the onerous PMT.

On behalf of more than 36,000 Farm Bureau families in Maryland, we request the withdrawal of this proposed regulation. The science is simply not ready. The cost-benefit analysis has not been conducted. And the argument that agriculture is at 130% now but needs to do more to stay on track is not acceptable to us.

If, after all the problems with the Bay Model are fixed and a true and accurate assessment shows there is still

an agricultural phosphorous issue, we will work cooperatively with the state to address it in a way that does not threaten to destroy the business model of the largest economic sector on the Eastern Shore.

Sincerely,



PATRICIA A. LANGENFELDER

President



MFB Board Comments to MDA on PMT Nov 2013.doc

41K

"Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorous Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard." Kevin Anderson - President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

my husband's farm has been in his family for over 100 years. If the PMT regulations go into effect it could cripple the agricultural community and put our way of life at risk. I strongly oppose this new PMT regulation!

RECEIVED

NOV 12 2013

OFFICE OF THE SECRETARY

Our Farms, Our Future

Name:

Address:

Phone:

Email:

Sincerely,
Kristin Hudson
9101 Lantown Rd
Berlin MD 21811
410-629-0496
khudson@hughes.net

440

"Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorous Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard." Kevin Anderson - President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

In writing this letter because I think this PMT Regulation is ridiculous trying to haul away manure instead of using it to grow a crop makes no sense. Farmers are the best recyclers they use everything they want to make a living.

RECEIVED

NOV 12 2013

OFFICE OF THE SECRETARY
Our Farms, Our Future

Sincerely, *Ethan Hudson*

Name: Ethan Hudson

Address: 9101 Lytton Road
Bethesda MD 2081

Phone: _____

Email: _____

441

"Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorous Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard." Kevin Anderson - President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

My family has been farming in Maryland for over a hundred years. We have always used some sort of livestock manure as our fertilizer so naturally our land is and has always been high in phosphorous. Phosphorous is always present and doesn't move unless you have erosion and with the farming practices now such as no-till, min-till there is no way for it to move. Also now we all have NMP's so we are putting on less fertilizer to grow the same crop so phosphorous is not to blame. So I am writing this letter to let it be known I oppose the "PMT" Reg's

RECEIVED

NOV 12 2013

OFFICE OF THE SECRETARY
Our Farms, Our Future

Sincerely,

Roger A. Hudson

Name: Roger Hudson
Address: 9129 OLD OR. RD.
Berlin MD.
Phone: _____
Email: _____

442

"Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorous Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard." Kevin Anderson - President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

I'm writing this letter to let you know I oppose the "PMT" Regulation's MDA has brought forth. As I told you before MDA's Idea of Storing Litter outside on state Land is not your best Idea But this whole Phosphorous thing is not either. More Power to you "MDA" to store it outside on state Land I'm sure the Waterkeepers will be thrilled by that!! On Your Idea of Educating the Big Farms Enrollment folks good luck you can't educate someone who is not willing to learn. Trust me I've learned this first hand. All this Regulation will do is put an end to Ag. in Maryland. What MDA and University of MD. has said make me feel like I'm back in my Law suit listening to the Waterkeepers Idea of Ag as a whole.

Sincerely, *Alan Hudson*

RECEIVED

Name: Alan Hudson
Address: 9101 Logtown RD
Berlin MD. 21811
Phone: 410-629-0496
Email: _____

443

Our Farms, Our Future

"Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorous Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard." Kevin Anderson - President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

I am writing to formally express my opposition to the implementation of regulations on the Phosphorous Mgt. Tool. We have heard the empty promises of funding before. Quite frankly, with limited resources in the state, much more effective use could be made spending the money in other areas for real environmental gain. These theoretical "potential for loss" and no apparent qualification of the economic impact just makes this unacceptable.

RECEIVED

NOV 12 2013

OFFICE OF THE SECRETARY

Our Farms, Our Future

Sincerely,

Name: Charles J. Otto
Address: 14451 Reading Ferry Rd
Princess Anne, MD 21853
Phone: 410-651-2134
Email: delegateotto@comcast.net

444

"Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorous Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard." Kevin Anderson - President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

The soil testing procedures you are using to not take into consideration that an allum treatment has been used by the poultry companies on the manure which attaches to the phosphorous and makes it immobile.

However, It is NOT Available to the plant. The soil test will say you have 150+ phosphorous, BUT, it can NOT tell if that element is available for the plant or if it is attached to alluminium and tied up chemically.

THIS has been pushed by the MDA and the poultry companies as a way of making the manure safer for the key, but it is now going to bite the farmers that used it in a devastating way.

Sincerely,
Name: Candace ANDERSON
Address: 9001 Ring Rd
Westover, MD 21871
Phone: 410-651-1791
Email:

445

Our Farms, Our Future

"Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorous Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard." Kevin Anderson - President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

These regulations are going to hinder my ability to make a profit and I will NOT be able to make a living on the farm that has been in my family for 100 years.

Poultry manure makes it feasible for me to raise corn profitably. without manure I will not plant corn with the cost of commercial fertilizer and be limited to soybeans, which are not a crop to have continuous rotation of.

RECEIVED

Sincerely,
Name: Roy J. Ring III
Address: P.O. Box 173
Westover MD 21871
Phone: 410-651-1260
Email: _____

446

Our Farms, Our Future

"Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorous Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard." Kevin Anderson, President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

These regulations are very restrictive and limit the amount of money my family farm can generate. These will cause the farm to be unprofitable and my family will lose the farm before the 5th generation can get it.

RECEIVED

Sincerely,
Name: Roy J. Ring IV
Address: P.O. Box 173
Westover MD 21871
Phone: 410-726-7347
Email:

447

OFFICE OF THE SECRETARY
Our Farms, Our Future

"Secretary of Agriculture Buddy Hance stated that he had received only eight comments about the new Phosphorous Management Tool (PMT) regulation. We wanted to make sure you have the opportunity to make your voice heard." Kevin Anderson - President, Maryland Grain Producers Association



Please use the space below to send comments regarding the PMT regulations to the Department of Agriculture. Comments should be received before November 18th. Alternatively, comments can be emailed to: Earl.Hance@maryland.gov.

Dear Secretary Hance:

ONCE again, political reasons not environmental goals, has forced us in the Ag community to speak out about government regulations that will hurt our bottom line and reduce our ability to farm in the state of Maryland. There are plenty of studies that show the cost to the farmer for the PMT regulations which are correct. However, having owned and killed my farm for over 40 years, the personal observation of my operation makes me believe the studies the government used to push this are incomplete and even falsify to promote their agenda. Hopefully the Ag community will come together and use our economic clout and push back against this political posturing.

RECEIVED

Sincerely,
Name: James Payne Jr.
Address: 5821 Long Pipe Rd.
Rhodesdale, Md. 21659
Phone: 410-883-3515
Email: _____

448

Our Farms, Our Future

449
November 7, 2013

Secretary Earl D. Hance
Maryland Department of Agriculture
50 Harry S Truman Parkway
Annapolis, Maryland 21841

RECEIVED

NOV 12 2013

OFFICE OF THE SECRETARY

Dear Secretary Hance:

I am a poultry company employee who has worked in Wicomico County for more than 6 years. I am extremely concerned about the Maryland Department of Agriculture's proposed regulation that will regulate the Phosphorous Management Tool.

The University of Maryland has not been able to complete their research. I understand wanting the best for our environment; however we cannot make decisions based on incomplete research. Many hard working families, including my own will be negatively impacted by the decision of putting into effect this regulation. Why would the state move forward without the proper information to back them up? If the University of Maryland is working on research related to Phosphorous Management and we don't allow them to finish – isn't this a waste of resources? We all need to be patient and work together to continue improving the agricultural community. Remember, without agriculture there is no food. And without food, there is no life.

There are many other ways we can work together to improve the quality of our environment. Agricultural companies and independent farmers are working together to achieve the Chesapeake Bay Watershed Implementation Plan; and as you are well aware, we are at 130% of the goal. Such a huge accomplishment seems to have been forgotten by Governor O'Malley, the Maryland Department of Agriculture, and the EPA. Something needs to be done to remind them of such efforts.

For any change or new plan to become successful, we need time: time to educate, train and finally implement strategies that will allow us to receive more gains than hardships in the process. Has there been a meaningful economic impact analysis? We cannot abandon our farmers and agricultural companies. If we allow the near-immediate implementation of this regulation, too many negative effects will be brought upon us without improving water quality. So, please slow this down.

Respectfully yours,

Charlin Casiano

Princess Anne, MD

*From: Charlin Casiano
11585 Pine Pole Rd.
Princess Anne MD 21853*

Worcester County Farm Bureau

P.O. Box 357
Snow Hill, Maryland 21863
410-632-3329

worcestercountyfarmbureau@gmail.com

450

November 7, 2013

The Honorable Earl Hance
Secretary of Agriculture
Department of Agriculture
Wayne A. Cawley, Jr. Building,
50 Harry S Truman Parkway, Annapolis, MD 21401 – 8960

RECEIVED

NOV 12-2013

OFFICE OF THE SECRETARY

Dear Mr. Secretary:

I own a winery/vineyard in Worcester County. Although being a winemaker sounds awfully romantic and glamorous, the simple fact is I am a farmer. A proud farmer, who happens to also be the President of Worcester County Farm Bureau.

I am writing this letter in opposition to the newly proposed phosphorus management guidelines. It seems the agriculture sector has come under assault in Maryland with newly imposed storm water management, sediment erosion and phosphorus/nutrient management regulations. These regulations just add to the burden farmers already face in running their businesses; these new regulations could be the straw that breaks the farmers back.

What ever happened to the assumed inherent goodness of each farmer to be a steward of his or her land? This administration has abandoned the time proven system of outreach and extension to stakeholders, including farmers, for a politically motivated and non-democratic approach to passing regulations and associated penalties. This surely does not ensure a robust, bi-partisan, wholistic, and collaborative process; the ensuing legislation is rife with issues as a result.

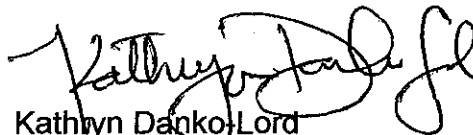
As an example, one of the biggest problems with the regulations is the changing (some might say arbitrary) index levels. Initially, chicken manure was permitted at 6 tons per acre, then 2 tons, then 1.5 tons. Now, depending on the phosphorous on site, a farmer may not be able to spread manure AT ALL if the level is 150. I may even have my facts wrong, because with such confusing changes, obviously not based on science, who can keep up? Farmers have implemented nutrient management plans, hired soil scientists, implemented Best Management Practices and the like. To impose yet another regulation, which will dramatically increase the cost of farming, is unfair and unfounded.

As you are aware, only 2% of the population in the US is farmers. An unfortunate perception from the non-farming community is that farming is a hugely profitable industry that can absorb costs and pass them on to consumers. The reality is much different; most farm families are "rich" in their ownership of the land but farm from wealthy when considering income. Most farm products are commodities raised on family farms by men and women who work long hours in a physically and mentally demanding industry so everyone can have the greatest grilled chicken salad at Panera Bread or the juiciest steak at Lone Star or the most delicate glass of Chardonnay at Ruth's Chris. All kidding aside, farming is the most honorable profession on the planet. We care for the land, raise hard working children, contribute to the spirit of the community, and feed the world.

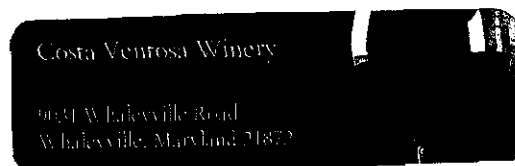
Every acre that goes out of production in Maryland and in North America opens up another acre of Brazilian Rain forest or impacts similar precious tracts of land. The negative externalities are simply passed from one area to another area; most often the production is shifted to an area that has no environmental safe guards in practice. We have the safest food supply and production in the world and we need to keep it here. And, yes, we need to have guidelines and laws that protect the environment based on sound science as we till the land and care for the livestock and harvest our grapes.

I support scientific based regulations but this current one is not scientific and not in the interest of the citizens of Maryland, both farming and non-farming alike.

Sincerely,



Kathryn Danko Lord
Owner, Costa Ventosa Winery
President, Worcester County Farm Bureau



451

November 8, 2013

RECEIVED

Secretary Earl D. Hance
Maryland Department of Agriculture
50 Harry S Truman Parkway
Annapolis, Maryland 21841

Dear Secretary Hance:

I am a chicken grower, who lives in Wicomico County and I am extremely concerned about the Maryland Department of Agriculture's proposed regulation related to the Phosphorus Management Tool.

My first fear is that the proposed regulation, which will have huge impacts on the state's agricultural community, is based on incomplete research. The University of Maryland researchers have stated that their work is not done, yet the state is moving forward at breakneck speed for what appears to be political reasons. Rather than being focused on how to support and improve the agricultural community, the department seems more concerned with appeasing the U.S. Environmental Protection Agency. If the farming sector in Maryland was lagging in achieving Chesapeake Bay Watershed Implementation Plan goals, then perhaps enhanced efforts would be needed, but as you have stated, we are at 130% of the goal. That's an accomplishment that seems to be lost on Governor O'Malley, the Maryland Department of Agriculture, and the EPA.

Allowing an extended and orderly phase-in of the implementation date of the Phosphorous Management Tool will cause no environmental harm. For decades, the scientific and regulatory community told farmers not to worry about applications of phosphorus to the soil because unless the soil moved, the phosphorus would not move. Recently, that thinking changed and farmers began applying manures based upon their phosphorus content. The phosphorus levels in soils and waters were achieved over decades and will not be corrected for decades, even if this new regulation changes manure application procedures in 2015. Waiting a few more years to allow for an orderly phase-in will not cause any harm to our environment. An orderly phase-in will allow the agricultural community to adjust and make required changes. Additionally, we saw firsthand how difficult and time consuming it was for Maryland CAFO farmers to obtain a Comprehensive Nutrient Management Plan and to think the conservation districts, the University of Maryland Extension, and/or private consultants can do enough side-by-side Phosphorus Site Index/Phosphorus Management Tool comparisons in 2014 to provide valid results does not seem feasible.

Here are some of my concerns about the near-immediate implementation of this regulation.

- Denied the ability to use manure, a locally produced organic fertilizer, on their own crops, some chicken farmers will have to buy commercial fertilizer to replace chicken

manure they already own. That will have a negative economic impact on the chicken growers.

- Chicken growers who have been selling their manure to other farmers may no longer have customers, thus a loss of income.
- Chicken growers who have had their chicken houses cleaned with manure removed from the farm without charge may now have to pay somebody to clean the houses and transport the manure since the cleaning/transporting company may not be able to sell the manure to make a profit and cover the costs of cleaning/transporting.

Once this regulation is in effect, as it appears it will be and contrary to the wishes of many in the agricultural community, there will be many negative effects to the farming community, individuals like me, and the entire state of Maryland without noticeable improvements in water quality.

Please, slow this down. Allow the scientific research to be completed and then allow an orderly phase-in much as the game-changing Water Quality Improvement Act of 1998 allowed a phase-in period. Without alternative uses of manure and cost effective replacements for this soon-to-be lost organic fertilizer, tremendous harm will come to the state of Maryland without improving the environment.

Respectfully yours,



Hyung Choi

Hyung Choi
32171 Shavox Rd.
Salisbury MD 21804

452
November 8, 2013

Secretary Earl D. Hance
Maryland Department of Agriculture
50 Harry S. Truman Parkway
Annapolis, Maryland 21841

RECEIVED

NOV 12 2013
OFFICE OF THE SECRETARY

Dear Secretary Hance:

I work for a poultry company that does business with hundreds of hard working poultry and grain farmers on the Eastern Shore of Maryland. I am opposed to the implementation of the proposed regulations relating to the new Phosphorus Management Tool (PMT).

I am opposed to these proposed regulations for these two reasons:

- The PMT is based on incomplete and possibly flawed science.
- There is a complete disregard for the economic impact that these proposed regulations will have on the agricultural community and the citizens of Maryland.

Marylanders cannot allow their zeal to lead on environmental issues to develop into arrogance. Certain entities seem to believe that Maryland is more concerned about the Chesapeake Bay than any other state. The excuse often given is that Maryland is the closest to the Bay. This implies that other regional states are not as concerned but this is not accurate. The other surrounding states are just as concerned for the health of the Bay but seem to be interested in learning more about the science. They want to see the new Chesapeake Bay model due in 2017. They want to hear more about studies of agriculture's impact on the bay from respected institutions like the University of Delaware. In other words, they are taking a sensible, mature approach.

There is a complete disregard for the economic impact that the proposed regulations will have on the State. MDA has been very arrogant about this, stating that we will find out what the impact is **after** the regulations are imposed. How can a State agency that exists to promote agriculture in the State have no interest in the impact of its actions? This needs to be corrected immediately but it will require leadership from MDA.

When considering new regulations, legislators should carefully evaluate the costs that the regulations will cause versus the benefit to the people. Clearly, this has not been done. Instead, we hear careless statements about being able to ship all of this manure off of the Shore or that the State will create some huge stockpile of manure somewhere, somehow. These are just absurd notions, that have been given so little thought that it is offensive to the intelligence of the citizens of the State.

I urge you to reconsider the proposed regulations relating to the new Phosphorus Management Tool (PMT). Let's make sure that we get the best information available from the entire region and from all concerned sources to make good decisions.

Sincerely,



Dean Stewart

23704 McDONALD DR
Georgetown, DE 19947

453

RECEIVED October 19, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

NOV 12 2013

OFFICE OF THE SECRETARY

Dear Mrs. Mercer,

I am writing to oppose the upcoming requirement that all Maryland nutrient management plans utilize the new, and untested, Phosphorus Management Tool (PMT). This tool will unfairly burden farm operations in my area by limiting and/or eliminating the option of poultry litter as an organic, slow release fertilizer. The costs associated with replacing poultry litter with an equivalent commercial fertilizer range from approximately \$100 to \$350 per acre. The additional costs associated with replacing litter as a nutrient source will place an unfair burden on Delmarva grain producers. In addition, poultry farmers will suffer as no viable option currently exists to take the manure generated on their farms, thus the costs of reutilization will fall on their shoulders. While MDA argues that the manure transport program will handle the exportation of manure, the reality is the trucking resources and cost recovery processes do not exist. Relocation of poultry litter on the scale required to satisfy the requirements under the PMT are not feasible, period!

Delmarva farmers and MDA through cost share programs have made considerable investments in storage, spreading equipment and manure management tools to minimize the environmental effects of poultry litter while maximizing the benefits to soil health and crop production. The PMT will render these investments useless and require similar and redundant investments wherever the ultimate fate of the manure resource proves to be.

I urge you to delay the implementation of the new PMT to enable thorough testing of the science behind the tool, give time for alternative uses to develop, and for farmers to find suitable and cost effective replacements for organic fertilizer that will be outlawed on most soils.

Sincerely,

Signature Seon Choi
Printed Name Seon Choi
Street Address 32171 Shavox Rd.
City, State, Zip Salisbury MD 21804

454
November 1, 2014

RECEIVED
NOV 12 2013
OFFICE OF THE SECRETARY

Secretary Earl D. Hance
Maryland Department of Agriculture
50 Harry S Truman Parkway
Annapolis, Maryland 21841

Dear Secretary Hance:

I am a farmer who lives in Queen Anne's County and I am extremely concerned about the Maryland Department of Agriculture's proposed regulation related to the Phosphorus Management Tool.

My first fear is that the proposed regulation, which will have huge impacts on the state's agricultural community, is based on incomplete research. The University of Maryland researchers have stated that their work is not done, yet the state is moving forward at breakneck speed for what appears to be political reasons. Rather than being focused on how to support and improve the agricultural community, the department seems more concerned with appeasing the U.S. Environmental Protection Agency. If the farming sector in Maryland was lagging in achieving Chesapeake Bay Watershed Implementation Plan goals, then perhaps enhanced efforts would be needed, but as you have stated, we are at 130% of the goal. That's an accomplishment that seems to be lost on Governor O'Malley, the Maryland Department of Agriculture, and the EPA.

Allowing an extended and orderly phase-in of the implementation date of the Phosphorous Management Tool will cause no environmental harm. For decades, the scientific and regulatory community told farmers not to worry about applications of phosphorus to the soil because unless the soil moved, the phosphorus would not move. Recently, that thinking changed and farmers began applying manures based upon their phosphorus content. The phosphorus levels in soils and waters were achieved over decades and will not be corrected for decades, even if this new regulation changes manure application procedures in 2015. Waiting a few more years to allow for an orderly phase-in will not cause any harm to our environment. An orderly phase-in will allow the agricultural community to adjust and make required changes. Additionally, we saw firsthand how difficult and time consuming it was for Maryland CAFO farmers to obtain a Comprehensive Nutrient Management Plan and to think the conservation districts, the University of Maryland Extension, and/or private consultants can do enough side-by-side Phosphorus Site Index/Phosphorus Management Tool comparisons in 2014 to provide valid results does not seem feasible.

Here are some of my concerns about the near-immediate implementation of this regulation. First and foremost, how can the Department of Agriculture even think about proposing a regulation that could cause such financial hardships on farm families when no meaningful economic impact analysis has been done?

Chicken Farms

- Denied the ability to use manure; a locally produced organic fertilizer, on their own crops, some chicken farmers will have to buy commercial fertilizer to replace chicken manure they already own. That will have a negative economic impact on the chicken growers.
- Chicken growers who have been selling their manure to other farmers may no longer have customers, thus a loss of income.
- Chicken growers who have had their chicken houses cleaned with manure removed from the farm without charge may now have to pay somebody to clean the houses and transport the manure

since the cleaning/transporting company may not be able to sell the manure to make a profit and cover the costs of cleaning/transporting.

- Even if the MDA establishes the state storage sites, it will be the chicken growers' responsibility to transport the manure to the site, possibly creating a cost for the chicken growers.
- If the value of manure is lost, then alternative use companies might start charging a fee to accept manure, much like a landfill charges for disposal. If any alternative use companies start operating, and nothing of any magnitude appears to be on the horizon, they might charge a disposal fee instead of buying manure or accepting it for free.

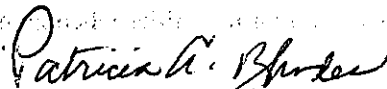
Crop Farmers

- Denied the ability to use manure on their crops, crop farmers will have to buy commercial fertilizer to replace chicken manure that they have been using.
- Crop farmers who have used manure and not commercial fertilizers may have to buy or rent commercial fertilizer application equipment, thus raising their costs of doing business.
- Crop farmers wanting to hire a fertilizer applicator might find that there are not enough applicators or equipment in the short fertilizer application period to allow timely fertilizer applications. Increased demand in services will allow these applicators to raise their fees, thus higher costs for crop farmers.
- While commercial fertilizer will help a crop grow, the micronutrients and organic material in animal manure will help grow a larger crop. If yields are lessened due to the loss of organic material and micronutrients, then farmer income will diminish.
- Crop farmers and chicken farmers alike will most likely have to alter their business plans in ways that weaken their ability to withstand adverse growing conditions and/or markets – requiring new expenditures/capital purchases while at the same time artificially reducing their potential yields.
- Crop farmers could see increased effects of drought on their crops as a result of losing poultry litter's organic material that helps build up the soil's moisture retaining capabilities.

Once this regulation is in effect, as it appears it will be and contrary to the wishes of many in the agricultural community, there will be many negative effects to the farming community, individuals like me, and the entire state of Maryland without noticeable improvements in water quality.

Please, slow this down. Allow the scientific research to be completed and then allow an orderly phase-in much as the game-changing Water Quality Improvement Act of 1998 allowed a phase-in period. Without alternative uses of manure and cost effective replacements for this soon-to-be lost organic fertilizer, tremendous harm will come to the state of Maryland without improving the environment.

Respectfully yours,



Patricia A. Rhodes
Chestnut Vale Farms

455
November 1, 2014

RECEIVED
NOV 12 2013
OFFICE OF THE SECRETARY

Secretary Earl D. Hance
Maryland Department of Agriculture
50 Harry S Truman Parkway
Annapolis, Maryland 21841

Dear Secretary Hance:

I am a farmer who lives in Queen Anne's County and I am extremely concerned about the Maryland Department of Agriculture's proposed regulation related to the Phosphorus Management Tool.

My first fear is that the proposed regulation, which will have huge impacts on the state's agricultural community, is based on incomplete research. The University of Maryland researchers have stated that their work is not done, yet the state is moving forward at breakneck speed for what appears to be political reasons. Rather than being focused on how to support and improve the agricultural community, the department seems more concerned with appeasing the U.S. Environmental Protection Agency. If the farming sector in Maryland was lagging in achieving Chesapeake Bay Watershed Implementation Plan goals, then perhaps enhanced efforts would be needed, but as you have stated, we are at 130% of the goal. That's an accomplishment that seems to be lost on Governor O'Malley, the Maryland Department of Agriculture, and the EPA.

Allowing an extended and orderly phase-in of the implementation date of the Phosphorous Management Tool will cause no environmental harm. For decades, the scientific and regulatory community told farmers not to worry about applications of phosphorus to the soil because unless the soil moved, the phosphorus would not move. Recently, that thinking changed and farmers began applying manures based upon their phosphorus content. The phosphorus levels in soils and waters were achieved over decades and will not be corrected for decades, even if this new regulation changes manure application procedures in 2015. Waiting a few more years to allow for an orderly phase-in will not cause any harm to our environment. An orderly phase-in will allow the agricultural community to adjust and make required changes. Additionally, we saw firsthand how difficult and time consuming it was for Maryland CAFO farmers to obtain a Comprehensive Nutrient Management Plan and to think the conservation districts, the University of Maryland Extension, and/or private consultants can do enough side-by-side Phosphorus Site Index/Phosphorus Management Tool comparisons in 2014 to provide valid results does not seem feasible.

Here are some of my concerns about the near-immediate implementation of this regulation. First and foremost, how can the Department of Agriculture even think about proposing a regulation that could cause such financial hardships on farm families when no meaningful economic impact analysis has been done?

Chicken Farms

- Denied the ability to use manure, a locally produced organic fertilizer, on their own crops, some chicken farmers will have to buy commercial fertilizer to replace chicken manure they already own. That will have a negative economic impact on the chicken growers.
- Chicken growers who have been selling their manure to other farmers may no longer have customers, thus a loss of income.
- Chicken growers who have had their chicken houses cleaned with manure removed from the farm without charge may now have to pay somebody to clean the houses and transport the manure

since the cleaning/transporting company may not be able to sell the manure to make a profit and cover the costs of cleaning/transporting.

- Even if the MDA establishes the state storage sites, it will be the chicken growers' responsibility to transport the manure to the site, possibly creating a cost for the chicken growers.
- If the value of manure is lost, then alternative use companies might start charging a fee to accept manure, much like a landfill charges for disposal. If any alternative use companies start operating, and nothing of any magnitude appears to be on the horizon, they might charge a disposal fee instead of buying manure or accepting it for free.

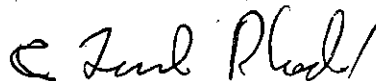
Crop Farmers

- Denied the ability to use manure on their crops, crop farmers will have to buy commercial fertilizer to replace chicken manure that they have been using.
- Crop farmers who have used manure and not commercial fertilizers may have to buy or rent commercial fertilizer application equipment, thus raising their costs of doing business.
- Crop farmers wanting to hire a fertilizer applicator might find that there are not enough applicators or equipment in the short fertilizer application period to allow timely fertilizer applications. Increased demand in services will allow these applicators to raise their fees, thus higher costs for crop farmers.
- While commercial fertilizer will help a crop grow, the micronutrients and organic material in animal manure will help grow a larger crop. If yields are lessened due to the loss of organic material and micronutrients, then farmer income will diminish.
- Crop farmers and chicken farmers alike will most likely have to alter their business plans in ways that weaken their ability to withstand adverse growing conditions and/or markets – requiring new expenditures/capital purchases while at the same time artificially reducing their potential yields.
- Crop farmers could see increased effects of drought on their crops as a result of losing poultry litter's organic material that helps build up the soil's moisture retaining capabilities.

Once this regulation is in effect, as it appears it will be and contrary to the wishes of many in the agricultural community, there will be many negative effects to the farming community, individuals like me, and the entire state of Maryland without noticeable improvements in water quality.

Please, slow this down. Allow the scientific research to be completed and then allow an orderly phase-in much as the game-changing Water Quality Improvement Act of 1998 allowed a phase-in period. Without alternative uses of manure and cost effective replacements for this soon-to-be lost organic fertilizer, tremendous harm will come to the state of Maryland without improving the environment.

Respectfully yours,



C. Temple Rhodes, Jr.
Chestnut Vale Farms

456

November 1, 2014

RECEIVED

NOV 12 2013

OFFICE OF THE SECRETARY

Secretary Earl D. Hance
Maryland Department of Agriculture
50 Harry S Truman Parkway
Annapolis, Maryland 21841

Dear Secretary Hance:

I am a farmer who lives in Queen Anne's County and I am extremely concerned about the Maryland Department of Agriculture's proposed regulation related to the Phosphorus Management Tool.

My first fear is that the proposed regulation, which will have huge impacts on the state's agricultural community, is based on incomplete research. The University of Maryland researchers have stated that their work is not done, yet the state is moving forward at breakneck speed for what appears to be political reasons. Rather than being focused on how to support and improve the agricultural community, the department seems more concerned with appeasing the U.S. Environmental Protection Agency. If the farming sector in Maryland was lagging in achieving Chesapeake Bay Watershed Implementation Plan goals, then perhaps enhanced efforts would be needed, but as you have stated, we are at 130% of the goal. That's an accomplishment that seems to be lost on Governor O'Malley, the Maryland Department of Agriculture, and the EPA.

Allowing an extended and orderly phase-in of the implementation date of the Phosphorous Management Tool will cause no environmental harm. For decades, the scientific and regulatory community told farmers not to worry about applications of phosphorus to the soil because unless the soil moved, the phosphorus would not move. Recently, that thinking changed and farmers began applying manures based upon their phosphorus content. The phosphorus levels in soils and waters were achieved over decades and will not be corrected for decades, even if this new regulation changes manure application procedures in 2015. Waiting a few more years to allow for an orderly phase-in will not cause any harm to our environment. An orderly phase-in will allow the agricultural community to adjust and make required changes. Additionally, we saw firsthand how difficult and time consuming it was for Maryland CAFO farmers to obtain a Comprehensive Nutrient Management Plan and to think the conservation districts, the University of Maryland Extension, and/or private consultants can do enough side-by-side Phosphorus Site Index/Phosphorus Management Tool comparisons in 2014 to provide valid results does not seem feasible.

Here are some of my concerns about the near-immediate implementation of this regulation. First and foremost, how can the Department of Agriculture even think about proposing a regulation that could cause such financial hardships on farm families when no meaningful economic impact analysis has been done?

Chicken Farms

- Denied the ability to use manure, a locally produced organic fertilizer, on their own crops, some chicken farmers will have to buy commercial fertilizer to replace chicken manure they already own. That will have a negative economic impact on the chicken growers.
- Chicken growers who have been selling their manure to other farmers may no longer have customers, thus a loss of income.
- Chicken growers who have had their chicken houses cleaned with manure removed from the farm without charge may now have to pay somebody to clean the houses and transport the manure

since the cleaning/transporting company may not be able to sell the manure to make a profit and cover the costs of cleaning/transporting.

- Even if the MDA establishes the state storage sites, it will be the chicken growers' responsibility to transport the manure to the site, possibly creating a cost for the chicken growers.
- If the value of manure is lost, then alternative use companies might start charging a fee to accept manure, much like a landfill charges for disposal. If any alternative use companies start operating, and nothing of any magnitude appears to be on the horizon, they might charge a disposal fee instead of buying manure or accepting it for free.

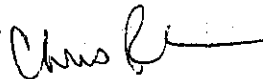
Crop Farmers

- Denied the ability to use manure on their crops, crop farmers will have to buy commercial fertilizer to replace chicken manure that they have been using.
- Crop farmers who have used manure and not commercial fertilizers may have to buy or rent commercial fertilizer application equipment, thus raising their costs of doing business.
- Crop farmers wanting to hire a fertilizer applicator might find that there are not enough applicators or equipment in the short fertilizer application period to allow timely fertilizer applications. Increased demand in services will allow these applicators to raise their fees, thus higher costs for crop farmers.
- While commercial fertilizer will help a crop grow, the micronutrients and organic material in animal manure will help grow a larger crop. If yields are lessened due to the loss of organic material and micronutrients, then farmer income will diminish.
- Crop farmers and chicken farmers alike will most likely have to alter their business plans in ways that weaken their ability to withstand adverse growing conditions and/or markets – requiring new expenditures/capital purchases while at the same time artificially reducing their potential yields.
- Crop farmers could see increased effects of drought on their crops as a result of losing poultry litter's organic material that helps build up the soil's moisture retaining capabilities.

Once this regulation is in effect, as it appears it will be and contrary to the wishes of many in the agricultural community, there will be many negative effects to the farming community, individuals like me, and the entire state of Maryland without noticeable improvements in water quality.

Please, slow this down. Allow the scientific research to be completed and then allow an orderly phase-in much as the game-changing Water Quality Improvement Act of 1998 allowed a phase-in period. Without alternative uses of manure and cost effective replacements for this soon-to-be lost organic fertilizer, tremendous harm will come to the state of Maryland without improving the environment.

Respectfully yours,



Chris R. Rhodes
Deerfield Farms

457

RECEIVED

November 1, 2014

NOV 12 2013

Secretary Earl D. Hance
Maryland Department of Agriculture
50 Harry S Truman Parkway
Annapolis, Maryland 21841

OFFICE OF THE SECRETARY

Dear Secretary Hance:

I am a farmer who lives in Queen Anne's County and I am extremely concerned about the Maryland Department of Agriculture's proposed regulation related to the Phosphorus Management Tool.

My first fear is that the proposed regulation, which will have huge impacts on the state's agricultural community, is based on incomplete research. The University of Maryland researchers have stated that their work is not done, yet the state is moving forward at breakneck speed for what appears to be political reasons. Rather than being focused on how to support and improve the agricultural community, the department seems more concerned with appeasing the U.S. Environmental Protection Agency. If the farming sector in Maryland was lagging in achieving Chesapeake Bay Watershed Implementation Plan goals, then perhaps enhanced efforts would be needed, but as you have stated, we are at 130% of the goal. That's an accomplishment that seems to be lost on Governor O'Malley, the Maryland Department of Agriculture, and the EPA.

Allowing an extended and orderly phase-in of the implementation date of the Phosphorous Management Tool will cause no environmental harm. For decades, the scientific and regulatory community told farmers not to worry about applications of phosphorus to the soil because unless the soil moved, the phosphorus would not move. Recently, that thinking changed and farmers began applying manures based upon their phosphorus content. The phosphorus levels in soils and waters were achieved over decades and will not be corrected for decades, even if this new regulation changes manure application procedures in 2015. Waiting a few more years to allow for an orderly phase-in will not cause any harm to our environment. An orderly phase-in will allow the agricultural community to adjust and make required changes. Additionally, we saw firsthand how difficult and time consuming it was for Maryland CAFO farmers to obtain a Comprehensive Nutrient Management Plan and to think the conservation districts, the University of Maryland Extension, and/or private consultants can do enough side-by-side Phosphorus Site Index/Phosphorus Management Tool comparisons in 2014 to provide valid results does not seem feasible.

Here are some of my concerns about the near-immediate implementation of this regulation. First and foremost, how can the Department of Agriculture even think about proposing a regulation that could cause such financial hardships on farm families when no meaningful economic impact analysis has been done?

Chicken Farms

- Denied the ability to use manure, a locally produced organic fertilizer, on their own crops, some chicken farmers will have to buy commercial fertilizer to replace chicken manure they already own. That will have a negative economic impact on the chicken growers.
- Chicken growers who have been selling their manure to other farmers may no longer have customers, thus a loss of income.
- Chicken growers who have had their chicken houses cleaned with manure removed from the farm without charge may now have to pay somebody to clean the houses and transport the manure

since the cleaning/transporting company may not be able to sell the manure to make a profit and cover the costs of cleaning/transporting.

- Even if the MDA establishes the state storage sites, it will be the chicken growers' responsibility to transport the manure to the site, possibly creating a cost for the chicken growers.
- If the value of manure is lost, then alternative use companies might start charging a fee to accept manure, much like a landfill charges for disposal. If any alternative use companies start operating, and nothing of any magnitude appears to be on the horizon, they might charge a disposal fee instead of buying manure or accepting it for free.

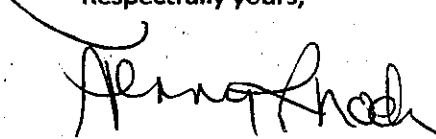
Crop Farmers

- Denied the ability to use manure on their crops, crop farmers will have to buy commercial fertilizer to replace chicken manure that they have been using.
- Crop farmers who have used manure and not commercial fertilizers may have to buy or rent commercial fertilizer application equipment, thus raising their costs of doing business.
- Crop farmers wanting to hire a fertilizer applicator might find that there are not enough applicators or equipment in the short fertilizer application period to allow timely fertilizer applications. Increased demand in services will allow these applicators to raise their fees, thus higher costs for crop farmers.
- While commercial fertilizer will help a crop grow, the micronutrients and organic material in animal manure will help grow a larger crop. If yields are lessened due to the loss of organic material and micronutrients, then farmer income will diminish.
- Crop farmers and chicken farmers alike will most likely have to alter their business plans in ways that weaken their ability to withstand adverse growing conditions and/or markets – requiring new expenditures/capital purchases while at the same time artificially reducing their potential yields.
- Crop farmers could see increased effects of drought on their crops as a result of losing poultry litter's organic material that helps build up the soil's moisture retaining capabilities.

Once this regulation is in effect, as it appears it will be and contrary to the wishes of many in the agricultural community, there will be many negative effects to the farming community, individuals like me, and the entire state of Maryland without noticeable improvements in water quality.

Please, slow this down. Allow the scientific research to be completed and then allow an orderly phase-in much as the game-changing Water Quality Improvement Act of 1998 allowed a phase-in period. Without alternative uses of manure and cost effective replacements for this soon-to-be lost organic fertilizer, tremendous harm will come to the state of Maryland without improving the environment.

Respectfully yours,



Jenny Rhodes

Deerfield Farm

458

RECEIVED

November 1, 2014

NOV 12 2013

Secretary Earl D. Hance
Maryland Department of Agriculture
50 Harry S Truman Parkway
Annapolis, Maryland 21841

Dear Secretary Hance:

I am a farmer who lives in Queen Anne's County and I am extremely concerned about the Maryland Department of Agriculture's proposed regulation related to the Phosphorus Management Tool.

My first fear is that the proposed regulation, which will have huge impacts on the state's agricultural community, is based on incomplete research. The University of Maryland researchers have stated that their work is not done, yet the state is moving forward at breakneck speed for what appears to be political reasons. Rather than being focused on how to support and improve the agricultural community, the department seems more concerned with appeasing the U.S. Environmental Protection Agency. If the farming sector in Maryland was lagging in achieving Chesapeake Bay Watershed Implementation Plan goals, then perhaps enhanced efforts would be needed, but as you have stated, we are at 130% of the goal. That's an accomplishment that seems to be lost on Governor O'Malley, the Maryland Department of Agriculture, and the EPA.

Allowing an extended and orderly phase-in of the implementation date of the Phosphorous Management Tool will cause no environmental harm. For decades, the scientific and regulatory community told farmers not to worry about applications of phosphorus to the soil because unless the soil moved, the phosphorus would not move. Recently, that thinking changed and farmers began applying manures based upon their phosphorus content. The phosphorus levels in soils and waters were achieved over decades and will not be corrected for decades, even if this new regulation changes manure application procedures in 2015. Waiting a few more years to allow for an orderly phase-in will not cause any harm to our environment. An orderly phase-in will allow the agricultural community to adjust and make required changes. Additionally, we saw firsthand how difficult and time consuming it was for Maryland CAFO farmers to obtain a Comprehensive Nutrient Management Plan and to think the conservation districts, the University of Maryland Extension, and/or private consultants can do enough side-by-side Phosphorus Site Index/Phosphorus Management Tool comparisons in 2014 to provide valid results does not seem feasible.

Here are some of my concerns about the near-immediate implementation of this regulation. First and foremost, how can the Department of Agriculture even think about proposing a regulation that could cause such financial hardships on farm families when no meaningful economic impact analysis has been done?

Chicken Farms

- Denied the ability to use manure, a locally produced organic fertilizer, on their own crops, some chicken farmers will have to buy commercial fertilizer to replace chicken manure they already own. That will have a negative economic impact on the chicken growers.
- Chicken growers who have been selling their manure to other farmers may no longer have customers, thus a loss of income.
- Chicken growers who have had their chicken houses cleaned with manure removed from the farm without charge may now have to pay somebody to clean the houses and transport the manure

since the cleaning/transporting company may not be able to sell the manure to make a profit and cover the costs of cleaning/transporting.

- Even if the MDA establishes the state storage sites, it will be the chicken growers' responsibility to transport the manure to the site, possibly creating a cost for the chicken growers.
- If the value of manure is lost, then alternative use companies might start charging a fee to accept manure, much like a landfill charges for disposal. If any alternative use companies start operating, and nothing of any magnitude appears to be on the horizon, they might charge a disposal fee instead of buying manure or accepting it for free.


Crop Farmers

- Denied the ability to use manure on their crops, crop farmers will have to buy commercial fertilizer to replace chicken manure that they have been using.
- Crop farmers who have used manure and not commercial fertilizers may have to buy or rent commercial fertilizer application equipment, thus raising their costs of doing business.
- Crop farmers wanting to hire a fertilizer applicator might find that there are not enough applicators or equipment in the short fertilizer application period to allow timely fertilizer applications. Increased demand in services will allow these applicators to raise their fees, thus higher costs for crop farmers.
- While commercial fertilizer will help a crop grow, the micronutrients and organic material in animal manure will help grow a larger crop. If yields are lessened due to the loss of organic material and micronutrients, then farmer income will diminish.
- Crop farmers and chicken farmers alike will most likely have to alter their business plans in ways that weaken their ability to withstand adverse growing conditions and/or markets -- requiring new expenditures/capital purchases while at the same time artificially reducing their potential yields.
- Crop farmers could see increased effects of drought on their crops as a result of losing poultry litter's organic material that helps build up the soil's moisture retaining capabilities.

Once this regulation is in effect, as it appears it will be and contrary to the wishes of many in the agricultural community, there will be many negative effects to the farming community, individuals like me, and the entire state of Maryland without noticeable improvements in water quality.

Please, slow this down. Allow the scientific research to be completed and then allow an orderly phase-in much as the game-changing Water Quality Improvement Act of 1998 allowed a phase-in period. Without alternative uses of manure and cost effective replacements for this soon-to-be lost organic fertilizer, tremendous harm will come to the state of Maryland without improving the environment.

Respectfully yours,



Ryan S. Rhodes
Deerfield Farms

11-8-13

459

RECEIVED

NOV 13 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

Mr A. M. Ed. D
Administrator, NMP
Maryland Dept of Agriculture
50 Harry S. Truman Parkway
Annapolis, Md 21401

Dear Mr. Messer,

I raise chickens in Vienna, Md.
and my father uses my
manure on his fields. That
way of doing business and clearing
my head.

If this proposed legislation -
Phosphorus Management Tool - goes
into effect - what will I
do with my manure?

If the State is trying to
put the chicken industry in
Maryland out of business they
are on the right track!

How can decisions be made
when the U of M researchers do
not have all the answers and/or
have not solved the manure distribution
problem without creating high costs to
the chicken grower?

-2-

Enjoy raising chickens, creating
food for human consumption and
fertilizer for other crops needed
for survival.

You, Dept of Agriculture came
out walk in my shoes for a
day. Farmers work hard and
the world benefits. Why try to
make it more harder, more expensive -
when you do not have enough
research to know what is and
is not affecting the water
quality.

Show down and complete
your research. Develop a
phase-in plan that will
change the Water Quality.

Thank you
Marcella J Digregorio

MARCELLA J. D. GREGORIO
POB 68
VIENNA, MD 21869



Thomas & Marcella Digregorio
P.O. Box 68
Vienna, MD 21869

460

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S. Truman Parkway
Annapolis, Maryland 21401

RECEIVED

NOV 13 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

Dear Dr. Mercer:

I am extremely concerned about the Maryland Department of Agriculture's proposed regulation related to the Phosphorus Management Tool

My first fear is that the proposed regulation, which will have huge impacts on the state's agricultural community, is based on incomplete research. The University of Maryland researchers have stated that their work is not done, yet the state is moving forward at breakneck speed for what appears to be political reasons. Rather than being focused on how to support and improve the agricultural community, the department seems more concerned with appeasing the U.S. Environmental Protection Agency. If the farming sector in Maryland was lagging in achieving Chesapeake Bay Watershed Implementation Plan goals, then perhaps enhanced efforts would be needed, but as Secretary of Agriculture Earl Hance has stated, we are at 130% of the goal. That's an accomplishment that seems to be lost on Governor O'Malley, the Maryland Department of Agriculture, and the EPA.

Allowing an extended and orderly phase-in of the implementation date of the Phosphorous Management Tool will cause no environmental harm. For decades, the scientific and regulatory community told farmers not to worry about applications of phosphorus to the soil because unless the soil moved, the phosphorus would not move. Recently, that thinking changed and farmers began applying manures based upon their phosphorus content. The phosphorus levels in soils and waters were achieved over decades and will not be corrected for decades, even if this new regulation changes manure application procedures in 2015. Waiting a few more years to allow for an orderly phase-in will not cause any harm to our environment. An orderly phase-in will allow the agricultural community to adjust and make required changes. Additionally, we saw firsthand how difficult and time consuming it was for Maryland CAFO farmers to obtain a Comprehensive Nutrient Management Plan and to think the conservation districts, the University of Maryland Extension, and/or private consultants can do enough side-by-side Phosphorus Site Index/Phosphorus Management Tool comparisons in 2014 to provide valid results does not seem feasible.

Here are some of my concerns about the near-immediate implementation of this regulation. First and foremost, how can the Department of Agriculture even think about proposing a regulation that could cause such financial hardships on farm families when no meaningful economic impact analysis has been done?

Chicken Farms

- Denied the ability to use manure, a locally produced organic fertilizer, on their own crops, some chicken farmers will have to buy commercial fertilizer to replace chicken manure they already own. That will have a negative economic impact on the chicken growers.
- Chicken growers who have been selling their manure to other farmers may no longer have customers, thus a loss of income.
- Chicken growers who have had their chicken houses cleaned with manure removed from the farm without charge may now have to pay somebody to clean the houses and transport the manure since the

cleaning/transporting company may not be able to sell the manure to make a profit and cover the costs of cleaning/transporting.

- Even if the MDA establishes the state storage sites, it will be the chicken growers' responsibility to transport the manure to the site, possibly creating a cost for the chicken growers.
- If the value of manure is lost, then alternative use companies might start charging a fee to accept manure, much like a landfill charges for disposal. If any alternative use companies start operating, and nothing of any magnitude appears to be on the horizon, they might charge a disposal fee instead of buying manure or accepting it for free.

Crop Farmers

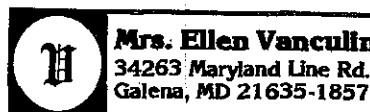
- Denied the ability to use manure on their crops, crop farmers will have to buy commercial fertilizer to replace chicken manure that they have been using.
- Crop farmers who have used manure and not commercial fertilizers may have to buy or rent commercial fertilizer application equipment, thus raising their costs of doing business.
- Crop farmers wanting to hire a fertilizer applicator might find that there are not enough applicators or equipment in the short fertilizer application period to allow timely fertilizer applications. Increased demand in services will allow these applicators to raise their fees, thus higher costs for crop farmers.
- While commercial fertilizer will help a crop grow, the micronutrients and organic material in animal manure will help grow a larger crop. If yields are lessened due to the loss of organic material and micronutrients, then farmer income will diminish.
- Crop farmers and chicken farmers alike will most likely have to alter their business plans in ways that weaken their ability to withstand adverse growing conditions and/or markets -- requiring new expenditures/capital purchases while at the same time artificially reducing their potential yields.
- Crop farmers could see increased effects of drought on their crops as a result of losing poultry litter's organic material that helps build up the soil's moisture retaining capabilities.

Once this regulation is in effect, as it appears it will be and contrary to the wishes of many in the agricultural community, there will be many negative effects to the farming community, individuals like me, and the entire state of Maryland without noticeable improvements in water quality.

Please, slow this down. Allow the scientific research to be completed and then allow an orderly phase-in much as the game-changing Water Quality Improvement Act of 1998 allowed a phase-in period. Without alternative uses of manure and cost effective replacements for this soon-to-be lost organic fertilizer, tremendous harm will come to the state of Maryland without improving the environment.

Respectfully yours,

Ellen L. Vanculin



461

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S. Truman Parkway
Annapolis, Maryland 21401

RECEIVED

NOV 13 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

Dear Dr. Mercer:

I am extremely concerned about the Maryland Department of Agriculture's proposed regulation related to the Phosphorus Management Tool

My first fear is that the proposed regulation, which will have huge impacts on the state's agricultural community, is based on incomplete research. The University of Maryland researchers have stated that their work is not done, yet the state is moving forward at breakneck speed for what appears to be political reasons. Rather than being focused on how to support and improve the agricultural community, the department seems more concerned with appeasing the U.S. Environmental Protection Agency. If the farming sector in Maryland was lagging in achieving Chesapeake Bay Watershed Implementation Plan goals, then perhaps enhanced efforts would be needed, but as Secretary of Agriculture Earl Hance has stated, we are at 130% of the goal. That's an accomplishment that seems to be lost on Governor O'Malley, the Maryland Department of Agriculture, and the EPA.

Allowing an extended and orderly phase-in of the implementation date of the Phosphorous Management Tool will cause no environmental harm. For decades, the scientific and regulatory community told farmers not to worry about applications of phosphorus to the soil because unless the soil moved, the phosphorus would not move. Recently, that thinking changed and farmers began applying manures based upon their phosphorus content. The phosphorus levels in soils and waters were achieved over decades and will not be corrected for decades, even if this new regulation changes manure application procedures in 2015. Waiting a few more years to allow for an orderly phase-in will not cause any harm to our environment. An orderly phase-in will allow the agricultural community to adjust and make required changes. Additionally, we saw firsthand how difficult and time consuming it was for Maryland CAFO farmers to obtain a Comprehensive Nutrient Management Plan and to think the conservation districts, the University of Maryland Extension, and/or private consultants can do enough side-by-side Phosphorus Site Index/Phosphorus Management Tool comparisons in 2014 to provide valid results does not seem feasible.

Here are some of my concerns about the near-immediate implementation of this regulation. First and foremost, how can the Department of Agriculture even think about proposing a regulation that could cause such financial hardships on farm families when no meaningful economic impact analysis has been done?

Chicken Farms

- Denied the ability to use manure, a locally produced organic fertilizer, on their own crops, some chicken farmers will have to buy commercial fertilizer to replace chicken manure they already own. That will have a negative economic impact on the chicken growers.
- Chicken growers who have been selling their manure to other farmers may no longer have customers, thus a loss of income.
- Chicken growers who have had their chicken houses cleaned with manure removed from the farm without charge may now have to pay somebody to clean the houses and transport the manure since the

cleaning/transporting company may not be able to sell the manure to make a profit and cover the costs of cleaning/transporting.

- Even if the MDA establishes the state storage sites, it will be the chicken growers' responsibility to transport the manure to the site, possibly creating a cost for the chicken growers.
- If the value of manure is lost, then alternative use companies might start charging a fee to accept manure, much like a landfill charges for disposal. If any alternative use companies start operating, and nothing of any magnitude appears to be on the horizon, they might charge a disposal fee instead of buying manure or accepting it for free.

Crop Farmers

- Denied the ability to use manure on their crops, crop farmers will have to buy commercial fertilizer to replace chicken manure that they have been using.
- Crop farmers who have used manure and not commercial fertilizers may have to buy or rent commercial fertilizer application equipment, thus raising their costs of doing business.
- Crop farmers wanting to hire a fertilizer applicator might find that there are not enough applicators or equipment in the short fertilizer application period to allow timely fertilizer applications. Increased demand in services will allow these applicators to raise their fees, thus higher costs for crop farmers.
- While commercial fertilizer will help a crop grow, the micronutrients and organic material in animal manure will help grow a larger crop. If yields are lessened due to the loss of organic material and micronutrients, then farmer income will diminish.
- Crop farmers and chicken farmers alike will most likely have to alter their business plans in ways that weaken their ability to withstand adverse growing conditions and/or markets – requiring new expenditures/capital purchases while at the same time artificially reducing their potential yields.
- Crop farmers could see increased effects of drought on their crops as a result of losing poultry litter's organic material that helps build up the soil's moisture retaining capabilities.

Once this regulation is in effect, as it appears it will be and contrary to the wishes of many in the agricultural community, there will be many negative effects to the farming community, individuals like me, and the entire state of Maryland without noticeable improvements in water quality.

Please, slow this down. Allow the scientific research to be completed and then allow an orderly phase-in much as the game-changing Water Quality Improvement Act of 1998 allowed a phase-in period. Without alternative uses of manure and cost effective replacements for this soon-to-be lost organic fertilizer, tremendous harm will come to the state of Maryland without improving the environment.

Respectfully yours,

Sir When you sit down for supper tonight
remember where the food came from. I don't know
why you want to punish us. When there's a
problem we all should work together. This
problem didn't happen fast so it won't
go away fast. Please help us work together

PO Box 384
SHARP TOWN MD
21861

Thank you
Joseph Kuller 410-7493438



Phosphorous Management Tool

Message

DAVID HERBST <dlh21783@hotmail.com>

Wed, Nov 13, 2013 at 1:31 PM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Mr Secretary :the Washington Co. Farm Bureau is opposed to the implementation of the new phosphorous management tool. No other government body has recognized this tool as being viable,we do not have any assurance that there will be a positive effect on the Bay if enacted, it will cost Millions of dollars to implement and cause the lose of farmers and farmland in Maryland. Please withdraw this proposal till we can be sure that it will help the Bay and know the consequences of such a drastic measure so we can decide if the negatives outweigh the positives. Thank you.

David Herbst
President Washington Co.
Farm Bureau

Sent from my iPhone

463

LAWRENCE C. THOMAS
32071 MITCHELL ROAD
PRINCESS ANNE, MARYLAND 21853
(410) 651-9327

November 12, 2013

MDA
Buddy Hance, Secretary of Ag
General Assembly Committee

We have a small family farm in Somerset County Maryland. This farm has been continuously farmed by our family for more than 10 generations, since late 1600. We are proud of our stewardship of this farm and several generations have received outstanding conservation farmer of the year from Soil Conservation District. Our concern is that the new PMT tool and regulations will cost our small farm so much that it will no longer be profitable. My understanding is that the new regulations are based on scientific evidence but with so many findings that dispute this, I have many concerns.

1. The University of Maryland is the only university I have been able to find that claims phosphorous is very mobile and moves through the soil. All the other universities say that it is non-mobile and will not move through the soil.
2. no account has been taken to separate phoserous that is available for plant food from that which is bonded in the soil by other elements and cannot be used by the plants.
3. the age of the study does not take into fact the changes and benefits we farmers have done to efficiently improve our use of the phosphorous and our effect of the bay.
4. looking at my soil samples the phosphorous numbers are dropping although still above the 150 number that was pulled out of air and uncertain where it came from. This means I cannot use my poultry manure to fertilize my field which will cost we more than \$ 28,000 on my 180 acres of corn. This could put me out of business.
5. our state spends hundreds of thousands of dollars to evaluate the economic impact of changing the opening day of school by four days yet why was no money spent to evaluate the economic impact of this pmt tool and regulation not just on the farmers but the many citizens effected by the trickle down of this.
6. why are so many of the findings on the university of Delaware in direct opposition to the data presented in the development of this tool by the university of Maryland? Shouldn't two scientific institutions be working together to improve and correct the flawed parts of this tool, before they move forward to implement.

Earl Hance - MDA - earl.hance@maryland.gov

(no subject)

Frerichs, Herb <Herb.Frerichs@perdue.com>
To: "Earl Hance (MDA)" <earl.hance@maryland.gov>

Wed, Nov 13, 2013 at 1:52 PM

Dear Secretary Hance:

My family and I are dependent upon the poultry industry and agriculture in Maryland and I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture. It is my view that it is premature to issue such guidelines before the science that is used as the basis for such regulation is validated, the economic impact of the regulation on all impacted parties is fully understood and a viable, practical solution for dealing with the resulting excess fertilizer is identified and put into place. To implement the regulation without those matters properly resolved would be reckless and cause irreparable harm to the Maryland economy and many of its citizens that we depend upon to provide jobs and economic growth.

Accordingly, I, along with like voters across Maryland, respectfully request that the implementation of this regulation be put on hold until;

- (1) A full economic impact study is completed, publicized, discussed and its results incorporated into the regulation;
- (2) Tested and proven plans are in place to deal with the excess organic fertilizer;
- (3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;
- (4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

I care deeply about the environment and fully support efforts to protect our natural resources, including the continued restoration of the Chesapeake Bay. However, we must do this responsibly and we must do it together. Making sure that the full impact of any decisions are understood before they are implemented is the obligation of prudent governance. Please make sure that the future of our state is not sacrificed on the altar of expediency.

Thank you for your consideration!

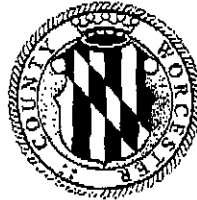
Herb Frerichs Jr.

Salisbury, Maryland

This communication, including attachments, may contain confidential, privileged, copyrighted or other legally protected information. If you are not the intended recipient, you are hereby notified that any use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please immediately re-send this communication to the sender and delete the original message and any copy of it, including all attachments, from your computer system.

TEL: 410-632-1191
FAX: 410-632-3131
E-MAIL: admin@co.worcester.md.us
WEB: www.co.worcester.md.us

465



OFFICE OF THE
COUNTY COMMISSIONERS

HAROLD L. HIGGINS, CPA
CHIEF ADMINISTRATIVE OFFICER
JOHN E. "SONNY" BLOXOM
COUNTY ATTORNEY

COMMISSIONERS
JAMES C. CHURCH, PRESIDENT
MERRILL W. LOCKFAW, JR., VICE PRESIDENT
JUDITH O. BOGGS
MADISON J. BUNTING, JR.
LOUISE L. GULYAS
JAMES L. PURNELL, JR.
VIRGIL L. SHOCKLEY

Worcester County

GOVERNMENT CENTER
ONE WEST MARKET STREET • ROOM 1103
SNOW HILL, MARYLAND
21863-1195

November 13, 2013

Earl F. Hance, Secretary
Maryland Department of Agriculture
50 Harry S. Truman Parkway
Annapolis, Maryland 21401

RE: Opposition to new Phosphorus Management Tool for Nutrient Management

Dear Secretary Hance:

At our meeting on October 1, 2013, the Worcester County Commissioners learned that the proposed Phosphorus Management Tool (PMT) for Nutrient Management is now being proposed by the Maryland Department of Agriculture. This regulation will have a severe negative impact on the use of poultry manure in Worcester County and would therefore be devastating to the agricultural industry in Worcester County and the State of Maryland. Given that agriculture is the second leading industry in Worcester County behind Tourism, this new regulation is of significant concern to the Worcester County Commissioners and we strongly oppose its adoption.

The Commissioners understand that the new Phosphorus Management Tool is intended to replace the current P-Site Index as the tool used to determine phosphorous application by identifying areas where excess phosphorous is present in the soil and a high potential for phosphorous loss exists. The effect of the new tool will be a higher likelihood that a field will not be able to take poultry litter. As a result, serious concerns have been raised about the proposed regulation by manure transporters who may have fewer farms willing to accept chicken manure, chicken growers who may have no place to send their manure thus creating problems on chicken farms, crop farms who will have extra costs to fertilize their fields since they will be denied the ability to use manure, and chicken companies who may have to reduce bird placements on some farms because of those farms' inability to clean out their houses in accordance with company recommendations. While the Worcester County Commissioners understand and appreciate the need to protect and preserve our natural environment, we also understand the need for balanced regulations which will also enable our local agricultural industry to continue to thrive and facilitate the economic recovery of Worcester County and the State of Maryland. Simply put, the proposed regulation appears to place too high a price on the agricultural operations in Worcester County. Therefore, prior to any further consideration, the

Citizens and Government Working Together

Worcester County Commissioners request that a comprehensive economic impact study be conducted to determine the full impact and cost of this new regulation.

Thank you for your consideration of our concerns. If you should have any questions with regard to our position on this matter, please feel free to contact either me or Harold L. Higgins, Chief Administrative Officer, at this office.

Sincerely,



James C. Church
President

JCC/KS/fac

cc: Senator James N. Mathias

Delegate Michael McDermott

Delegate Norman Conway

Delegate Charles Otto

Bob Mitchell, Director of Environmental Programs

Bill Badger, Director of Economic Development

Bill Satterfield, Executive Director, Delmarva Poultry Industry

H:\CC\101\PMT for Nutrient Mgmt opposition.wpd



Earl H. Hance, Secretary, Maryland Department of Agriculture

OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

11/13/2013

Jones, Maryann <Maryann.Jones@perdue.com>

Wed, Nov 13, 2013 at 4:25 PM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Maryann Jones

Salisbury, Maryland



Poultry Litter Regulations Public Comment

jonismith66 <jonismith66@gmail.com>
Reply-To: jonismith66 <jonismith66@gmail.com>
To: earl.hance@maryland.gov

Wed, Nov 13, 2013 at 4:16 PM

Dear Mr. Hance & any others including legislators concerned in this matter,

I deeply concerned with the new regulations that are purposed to be set into place on the farmers of Md. & how that will effect the farms, the farm family's and the general public as a whole here on the Easter Shore. I am making this statement based off of the information that was available at the public meeting on the subject that I attended in Oct. In Salisbury, Md. I can't express in words how up set that I was after leaving that night at thought it may not be wise to sit down and write you then because I may made some statements that were not as rational as I would like for them to be.

Here's some in sight on who I am and why this is important to me, I'm at least a 5th generation farmer, I haven't done any research to see if the history goes back farther then that, but my pop-pop was a farmer as was his pop-pop, which to him was important for me to know. As a child I had no idea why this was important to him, that I know that, but now as an adult I know why and I am greatful for that and every other lesson he taught me along the way, which I would not have learned if he had not been a farmer. Before I was 5 I could tell you just at sight what every was by it's leaves, what every plant in the garden was and when they were ripe, which bird was which by the sounds it made or it's appearance, I knew the difference in a rooster and a hen by sight at a few weeks old, and which bugs helped crops & which ones ate them, at the age of 5. Most children are learning abc's at that age, I already knew mine. Today there are college classes that teach our park rangers and natural resources officials the same things that this man taught me as a young girl. If he had been anything but a farmer I would have never gotten that education that comes with such a tremendous price tag these days, even though he worked from sun up to after sundown, and in the middle of the night when something broke or we had a storm, he taught me all he could. If he had been a contractor, Dr. , state worker, judge, lawyer, retail employee, or a number of other things, I would have never learned all I did before ever even entering kindergarden, farming kept him on the farm & inturn closer to his family, which for me was a blessing, I learned that its not worth doing if you don't do it right, & it's not worth having if you didn't work for it, I learned what work, real hard work was and what kind of struggles that man delt with daily to keep his family fed. He taught me honesty, & respect, values, & morals, & that you treat people as you would want to be treated, and that you don't go out looking for a fight, but you do stand your ground and fight for what you believe in, and that family is everything. That I couldn't have learmed anywhere other then that farm, because in any other setting children can't accompany they're parents or grandparents to work, its not allowed & frowned upon, but kids lose the time with their parents, when mom & dad have to put them in daycare centers & the lose the lessons that could be taught also. So to me keeping his legacy alive for my future grand kids is important and them being to grow up as I did, is important, & when something threatens that it is of great concern to me as is with many farmers.

So now that you know a little about me & where I come from, I will voice my oppinion on the new phcsphorus management tool. I think the decision to implement this given tool was made in haste, I don't feel as though there is enough information on the tool it's self, the economic impacts that it is going to have on the community & economy as a whole, not just the farming community, also the effects it will have directly on the farming

community, and the further degradation that it will have on the farming community that already faces the parallels of less land availability for farming, but an increasing population to feed. I feel as though the farmers are a focal point for the water keepers and legislators because we are a smaller group of people that represents far less numbers in a larger mass of people so it is easier to impose regulation on us than it is to impose those regulations on a city, it is unfair, to say the least. I have worked in construction for a part of my life & therefore from time to time have worked at the waste water treatment facilities; different towns have different out puts into different water ways but you can not tell me that all the farms in the town I live in put more stuff in the water than these plants do. I know of one here on the shore, and I won't say where that pumps the water directly into the bay!!! So sitting on the bay close enough to pump into the bay, where do you think the spillage goes if there is an overflow or spillage event???? Hummm. Yet our little farms most of which are not directly on the bay, are supposedly the ones polluting the bay, and the majority of the regulations fall on us. Come on now, I don't have a masters in science, but my pretty certain good old common sense could tell you otherwise. I do not think it is fair or decent in anyway for law makers impose these regulations on us when the regulations on human waste are far too lax, simply because there are more people to oppose that matter. I asked at the meeting what the grand plan was for phosphorus management after there were fewer farms to regulate, because this new tool would put a lot of small farmers under, no one could answer that question???? Which again leads me to believe nowhere near enough research has been done on this tool or its impacts, the farms are complying with the regulations that have been put in place thus far, if you run them out of business, or they simply give up because of all the expenses & hassles it is to comply and then still may end up in trouble (like the Hudson Farm), then what happens when their land is developed and more water treatment plants have to be built, & the regulation that they have to comply with are far less stringent than ours? I guess it will be good the 1st few years because of the things the farmers have put in place but not long because that pollution is immediate, it's not run off or leaching which takes place over decades, from our farms. I would strongly suggest that some of the deciding legislation take a short course on elementary "cause & effect" if they are not going to at least have research that is supportive of all impacted factors when making these decisions. I do understand that your backs are against a wall & I do understand that changes need to be made to further improve the bay, I would like to see the bay in better condition, my kids fish and crab there, but the farming community is not the only community that has to make changes, we are probably one of the smaller factors, & I am not sure if it is simple demographics that are against us or if it is more than that, but I can tell you it makes me mad, & sad all at the same time when a community that has brought to such a small area, & has met and exceeded the goals for the bay are still on the chopping block. I Guess every one in Annapolis thinks those cans of food grow right there on the shelf, in that store. Unfortunately, they would be mistaken, it takes a lot of time, money, & people to get it there.

In closing I would hope that a little common sense would come to pass in Annapolis, and there would be more research done on this new tool, before making it a regulation, the tool itself & whether it is the best suited for our area, because different soils test different, and a farm 4 miles from mine has far different soil than mine does, and may have a different soil testing method that works more efficiently than another, I hope they would consider the effects it would have on the region, not just the state, because the economics are all tied together, & keep in mind that on black and white print all things may appear fine but in the real world that may not be the case. I hope the fact that the farm population in general is aging, & they can no longer do what someone in their 20s can, also keep in mind that some do not have email, or facebook, twitter, ect. So to post updates on your web page is great for us in the younger generation is great but to the 84 year old farmer like my uncle, it doesn't relay the messages very well, because his info will come from a news paper or the evening news, aside from that their health isn't what it once was and the money that these new regulations may impose may very well be the difference in fertilizers for crops, or blood pressure medicine, for some, especially with our health care system in the condition it is in now. I also hope that if public awareness is going to be one of the focuses with these new regulations, then someone, that's pushing for these regulations, should make the general community aware of the potential impacts on them as a whole. We as farmers know what it could do to us and them but they for the most part are totally in the dark because no body sees the connection, especially as busy as the world is today between their food, fuel, jobs, and manure. Simple as this less farms mean, less small businesses, which is less farm jobs, less food, less feed mill jobs, less grain mill jobs, higher food cost, higher fuel cost, less money going to equipment dealers in the area, equipment supply Co for animal operations in the area, pest control operations in the area, to fuel companys in the area, fewer poultry plant jobs, fewer truck drivers for them, less contractor opportunities, also less jobs, and then there are the hardware stores that so many of us farmers frequently visit to do routine maintenance on our operations, less revenue for them also. It's a cycle. That the general public should be made aware of because it impacts them also which may not mean anything at the capital until it's time to vote, but in areas like ours that depend greatly on the farming industry, it's a game

changer. Most farmers don't have a problem helping with anything, especially something as important as the bay, but it has to be realistic, it can't be one sided, & the notion to help comes quite naturally, however being told you have to do something that could potentially put a hardship on your family and business that most of us have devoted our lives to, on the land tha we own, and paid for, or that our familys have owned for years, is not very well recieved, most of the people from here are farmers, have family that farms, work on farms, or farm equipment, built for farmers, or work in the poultry plants or have family or friends that do. It's pretty cut and dry that the farming industry is what in one way, shape, or form, be it beef, pork, poultry, grain, produce,, dairy, equestrian, ect, keeps this area going, when all the tourist leave our beaches, the farms are what we have, you can't bring that much revenue in from any other source over night, & why would you want to? When the run off to the bay from us doesnt hold a candle to that of Baltimore, lets say. But no one can regulate that they may lose to many votes right? There needs to be a better plan, and more answers or Maryland and the Eastern shore as a whole will lose money, at the Salisbury meeting for example there was an organic farmer there seated in front of me, his operation is based off of natural fertilizers which are supposed to be better for may reasons, then synthetics, he said" they pushed so much for organic, now want just they opposite, im going to have to sell both of my farms, and get the hell out of Md." The man left before the meeting was through, and had no more answers to his questions or any more hope then he came there with. It should be noted, this man was a younger farmer, maybe 35, but if thats how he feels at this point, the imagine what the aging generation is up against, & how much easier for them it would be just to sell their farms to developer's then to keep farming, most people are retiring at the age of the average farmer in Md. But the majority of the farmers don't have a 401k and their pention is in the ground they plant every year. I will like to think that the concerns for my self, as well as other farmers in the area, and all others that are potentially effected by this tool would be taken into consideration before this to tool put into place , so that the consequences are not ahead of the plan, so to speak. If not done properly because of being rushed the results could be horrible for the area, and after it is enacted and things begin to take place there's no saying sorry or do overs. I think we all know it is not that simple.

Thank you for your time.

Sincerely,

Joni Smith-Spinella,



Printed on 11/13/2013 4:50 PM

Proposed PMT regulation in Maryland

Dave Patey <dpatey@mountaire.com>

Wed, Nov 13, 2013 at 4:50 PM

To: "jo.mercer@maryland.gov" <jo.mercer@maryland.gov>, "earl.hance@maryland.gov" <earl.hance@maryland.gov>

I am writing to strongly oppose the proposed PMT regulation as currently written.

I have worked in the chicken industry all my life.

Most all of my family and many of my friends are either chicken growers, row crop farmers or work in and around the chicken industry.

The Ag industry in this area and therefore my family's future will be deeply and negatively affected if this rule goes in to affect anytime in the foreseeable future as written.

There are two main and fundamental problems with the rule.

- First there is absolutely no science showing that high phosphorus soils or the application of added phosphorous to them actually poses any environmental concern due to leaching in to the bay, so why enact.
- Secondly there has been no true financial impact study of the law done although it is very obvious that the cost to crop farmers and chicken farmers will be very high.

To me it is very logical if something costs a lot of money but adds no value then it should not be done.

The State of Maryland needs to use some common sense and stay with adding fertilizer at crop use rates and leave the current tool alone until the research needed tells us otherwise.

Thanks for your consideration

David Patey

Director of Live Operations

Mountaire Farms

Office: 302 934 4093

Cell: 302 381 6381



Earl Hance - 410-486-4000 - 1000 Pennsylvania Avenue, NE

OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Davis, Harold <Harold.Davis@perdue.com>

Thu, Nov 14, 2013 at 7:06 AM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Cc: "Schwalb, Steve" <Steve.Schwalb@perdue.com>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Harold Davis

Berlin, Maryland



New Proposal on Phosphorus Reg's

Bill Massey <bmassey@mountaire.com>

Thu, Nov 14, 2013 at 8:02 AM

To: "jo.mercer@maryland.gov." <jo.mercer@maryland.gov>

Cc: "earl.hance@maryland.gov" <earl.hance@maryland.gov>

I am writing to express my concern for the new Phosphorus Reg's Proposal.

I was born and raised in Wicomico County on a farm where we grew corn, beans, truck crops and poultry. My father worked with the County Agents, including Bob Miller and Wayne Shaft, over the years to follow recommended practices for growing our crops. These practices were used to grow high quality products while using recommended perimeters. When manure storage structures came about we participated and used this structure as prescribed. Having followed recommendations through out our farming history it is painful to hear and read how bad our geographic area handled nutrients.

The poultry industry has worked for many years with the farming community to help with concerns of over nitrification reaching the bay. An example of this is the implementation of phytase in poultry feeds which has lowered phosphorus content in feed and thus manure. Farmers now watch very closely how nutrients are handled. I believe it will be hard to find a group that has done more than the ag. Community to help with the concern of bay pollution.

If indeed more changes need to happen it needs to be done in a well thought out manner versus rushing to act similar to Obama Care which is blowing up in the faces of those it was suppose to help. I call this unintended consequences when something is done to meet a deadline when you know the facts are not all in. Our neighboring states that were sharing this work have said there is more that needs to be learned before the best decision can be made. After all Maryland is not the only state that owns the bay problem. This does not need to be another lets pass this bill so we can see what's in it situation.

I respectfully ask that we keep working on a solution in unison with the other bay states and be sure we get all the facts before rushing into a situation that could have grave unintended consequences.



PROPOSED REGULATION

Carol Oliphant <coliphant@pepupinc.com>
To: earl.hance@maryland.gov

Thu, Nov 14, 2013 at 8:05 AM

I am extremely concerned about the Maryland Department of Agriculture's proposed regulation related to the Phosphorus Management Tool

My first fear is that the proposed regulation, which will have huge impacts on the state's agricultural community, is based on incomplete research. The University of Maryland researchers have stated that their work is not done, yet the state is moving forward at breakneck speed for what appears to be political reasons. Rather than being focused on how to support and improve the agricultural community, the department seems more concerned with appeasing the U.S. Environmental Protection Agency. If the farming sector in Maryland was lagging in achieving Chesapeake Bay Watershed Implementation Plan goals, then perhaps enhanced efforts would be needed, but as Secretary of Agriculture Earl Hance has stated, we are at 130% of the goal. That's an accomplishment that seems to be lost on Governor O'Malley, the Maryland Department of Agriculture, and the EPA.

Allowing an extended and orderly phase-in of the implementation date of the Phosphorous Management Tool will cause no environmental harm. For decades, the scientific and regulatory community told farmers not to worry about applications of phosphorus to the soil because unless the soil moved, the phosphorus would not move. Recently, that thinking changed and farmers began applying manures based upon their phosphorus content. The phosphorus levels in soils and waters were achieved over decades and will not be corrected for decades, even if this new regulation changes manure application procedures in 2015. Waiting a few more years to allow for an orderly phase-in will not cause any harm to our environment. An orderly phase-in will allow the agricultural community to adjust and make required changes. Additionally, we saw firsthand how difficult and time consuming it was for Maryland CAFO farmers to obtain a Comprehensive Nutrient Management Plan and to think the conservation districts, the University of Maryland Extension, and/or private consultants can do enough side-by-side Phosphorus Site Index/Phosphorus Management Tool comparisons in 2014 to provide valid results does not seem feasible.

Here are some of my concerns about the near-immediate implementation of this regulation. First and foremost, how can the Department of Agriculture even think about proposing a regulation that could cause such financial hardships on farm families when no meaningful economic impact analysis has been done?

Chicken Farms

- Denied the ability to use manure, a locally produced organic fertilizer, on their own crops, some chicken farmers will have to buy commercial fertilizer to replace chicken manure they already own. That will have a

negative economic impact on the chicken growers.

- Chicken growers who have been selling their manure to other farmers may no longer have customers, thus a loss of income.
- Chicken growers who have had their chicken houses cleaned with manure removed from the farm without charge may now have to pay somebody to clean the houses and transport the manure since the cleaning/transporting company may not be able to sell the manure to make a profit and cover the costs of cleaning/transporting.
- Even if the MDA establishes the state storage sites, it will be the chicken growers' responsibility to transport the manure to the site, possibly creating a cost for the chicken growers.
- If the value of manure is lost, then alternative use companies might start charging a fee to accept manure, much like a landfill charges for disposal. If any alternative use companies start operating, and nothing of any magnitude appears to be on the horizon, they might charge a disposal fee instead of buying manure or accepting it for free.

Crop Farmers

- Denied the ability to use manure on their crops, crop farmers will have to buy commercial fertilizer to replace chicken manure that they have been using.
- Crop farmers who have used manure and not commercial fertilizers may have to buy or rent commercial fertilizer application equipment, thus raising their costs of doing business.
- Crop farmers wanting to hire a fertilizer applicator might find that there are not enough applicators or equipment in the short fertilizer application period to allow timely fertilizer applications. Increased demand in services will allow these applicators to raise their fees, thus higher costs for crop farmers.
- While commercial fertilizer will help a crop grow, the micronutrients and organic material in animal manure will help grow a larger crop. If yields are lessened due to the loss of organic material and micronutrients, then farmer income will diminish.
- Crop farmers and chicken farmers alike will most likely have to alter their business plans in ways that weaken their ability to withstand adverse growing conditions and/or markets – requiring new expenditures/capital purchases while at the same time artificially reducing their potential yields.
- Crop farmers could see increased effects of drought on their crops as a result of losing poultry litter's organic material that helps build up the soil's moisture retaining capabilities.

Once this regulation is in effect, as it appears it will be and contrary to the wishes of many in the agricultural community, there will be many negative effects to the farming community, individuals like me, and the entire state of Maryland without noticeable improvements in water quality.

Please, slow this down. Allow the scientific research to be completed and then allow an orderly phase-in much as the game-changing Water Quality Improvement Act of 1998 allowed a phase-in period. Without alternative uses of manure and cost effective replacements for this soon-to-be lost organic fertilizer, tremendous harm will come to the state of Maryland without improving the environment.

Respectfully yours,

Carol Oliphant, Pep-Up Inc.



OPPOSITION TO PROPOSED MARYLAND PHOSPOROUS MANAGEMENT TOOL REGULATION.

Small, William <William.Small@perdue.com>

Thu, Nov 14, 2013 at 8:36 AM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Cc: "Schwalb, Steve" <Steve.Schwalb@perdue.com>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed and its

results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined.

These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

William Small

Salisbury Md.



Opposition to the PMT

Allen Davis <allendavis520@gmail.com>


Wed, Nov 13, 2013 at 9:01 PM

To: Earl.Hance@maryland.gov

Dear Buddy,

I am writing to express my strong opposition to the implementation of the PMT as it is currently proposed. It is my belief that the only science on which this program is based is political science developed to pave the way for Governor O'Malley's agenda. His agenda does not seek to promote production agriculture in Md. but rather to win favor with the environmental activists. The so called science that the Governor has been promoting through the U of Md. has accomplished one thing, to destroy most of the faith and credibility that Md. Farmers ever held in the University's research. The telling event for me was Dr. Coale's letter which was read at the Easton hearing where he stated that his research would be done to support the Governor's position. At that hearing he also answered Bill Sylvester's question about whether he could say that there would be any phosphorus kept out of the bay as a result of the PMT and he answered "No". With no more confidence in the success of the PMT than Dr. Coale has, how can you support burdening Maryland Farmers with such terrible regulation.

Allen Davis, grain/poultry farmer, Kent County, Md.

 **pmt letter.docx**
14K



PMT regulations COMMENT received by NOV. 18th

amy bowers <btseal@yahoo.com>

Thu, Nov 14, 2013 at 9:45 AM

Reply-To: amy bowers <btseal@yahoo.com>

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance,

I am writing to give you and everyone who is on board for the new PMT regulations my comments/opinion for why it should be put on a stand still until the thorough information has been received and research has been done so the excuate facts are in for how it will effect the farmers and all is involved.

Lets start with that you at the easton meeting on Oct. 15th stated that money was not an issue for this new PMT regulation. If that was the case, then why did the college do the model D which cost a fraction and only 2 months compared to model A which was 2 years and almost 400,000. Im assuming it was the time. You want to push the new regulation through not caring or wanting to get the accurate facts along with data to see how it will effect the farmers business or even if it will help the Chesapeake Bay.

So right now no one can answer how it will effect a farmer as a whole with the business, like cost, time, man power, etc. Then they have no idea where this litter stations will be going or how many. How far they will be from farmers and how they will monitor each farmers litter. Plus who will pay for the transportation of the litter.

Then you need to look at if they need to start using fertilizer. If so will the cost go up. When the economy was good and house market was good some years ago things went up along with fertilizer and when the economy came crashing down the price of the fertilizer did not. So this could be another money maker for the this market. Then it will hurt all farmers, even ones who dont use no manure.

The farmers have done everything that has been asked of them over the years. Its time that you listen to the farmers. We are not asking that you don't ever put this new regulation into affect. We are asking that you accurately do the proper research and get all the data that is needed to see who will be effected, how the state will help those effected, always help, which farmers accurately are hurting the Chesapeake Bay or even if the phosphorus from the farmers farm is reaching the Bay. And that they also work just as hard on the sludge facilities. They are constantly pouring sludge into the Bay. They need to upgrade and soon Maryland can nolonger transport sludge to VA. So why not build a facility for sludge as they signed a contract with EGO Corp. Inc. of Arlington, VA for the the facility at eastern Correctional Institute to produce power on sludge than manure.

Its like Maryland is targeting farmers. News is on them not the other or real polluters. Does Maryland want the agriculture business in there state. Do they want money in this state or just a poor state. Lets be real here.

Thank you

Sincerely,

475

RECEIVED

NOV 14 2013
OFFICE OF THE SECRETARY

11-11-13

Paul W. Javorek

26829 Bakers Rd

Dorton MD 21639

Bad News Farm

Dear Secretary, thank you!

I am a small chicken grower on

Hay Production, with live in Corleone

County, ME. I am concerned about the

Thompson's Department of Agriculture's

proposal related to the Phosphorus Management

Act. How do you know we are responsible

for the phosphorus? Has anyone taken

a look at the change in the weather.

Years ago the bay was to freeze over and

now it doesn't. Nobody knows the answers

to what the Bay Problem comes from, so

they fall all the blame on the poultry

industry and farmers. It just like

the computer virus. Nobody knows for

sure. How are we had the answers for

it either, so to why we needed it.

All of did was created a job for

someone. What is that the Phosphorus

Management Act is for to waste a job

for someone else. You taking away

income and making more expenses

for me if regulations go through. The

fact is that the Phosphorus is not

the problem to lose them just

Chicken farms you will also find the
grown farms, if chicken farms are
gone that means loss of jobs for
Chicken Companies, Electric Companies,
Gas Co. Truck Drivers, Fuel Co. and
who ever else this involves. If

we are out of a job, you will be too
if we are not able to raise

chickens are you going to pay
my bill for me and my
family!!! Please reconsider

there are alot of downside the
this regulation I found on the

~~the~~ income from my poultry
farm just to live a average
life, on the poultry farms
can't be all the problem
with the Chesapeake Bay.

Thank you

Paul W. Towers Jr.
PAUL W. TOWERS SR.

Mary A. Towers
Marilyn Towles
B&B News Farm
11-11-13

11-11-13
Insert date

Secretary Earl D. Hance
Maryland Department of Agriculture
50 Harry S Truman Parkway
Annapolis, Maryland 21841

BAD News Farm

Dear Secretary Hance:

I am a (a crop farmer, a chicken grower, something else) who lives in (??? County) and I am extremely concerned about the Maryland Department of Agriculture's proposed regulation related to the Phosphorus Management Tool.

My first fear is that the proposed regulation, which will have huge impacts on the state's agricultural community, is based on incomplete research. The University of Maryland researchers have stated that their work is not done, yet the state is moving forward at breakneck speed for what appears to be political reasons. Rather than being focused on how to support and improve the agricultural community, the department seems more concerned with appeasing the U.S. Environmental Protection Agency. If the farming sector in Maryland was lagging in achieving Chesapeake Bay Watershed Implementation Plan goals, then perhaps enhanced efforts would be needed, but as you have stated, we are at 130% of the goal. That's an accomplishment that seems to be lost on Governor O'Malley, the Maryland Department of Agriculture, and the EPA.

Allowing an extended and orderly phase-in of the implementation date of the Phosphorous Management Tool will cause no environmental harm. For decades, the scientific and regulatory community told farmers not to worry about applications of phosphorus to the soil because unless the soil moved, the phosphorus would not move. Recently, that thinking changed and farmers began applying manures based upon their phosphorus content. The phosphorus levels in soils and waters were achieved over decades and will not be corrected for decades, even if this new regulation changes manure application procedures in 2015. Waiting a few more years to allow for an orderly phase-in will not cause any harm to our environment. An orderly phase-in will allow the agricultural community to adjust and make required changes. Additionally, we saw firsthand how difficult and time consuming it was for Maryland CAFO farmers to obtain a Comprehensive Nutrient Management Plan and to think the conservation districts, the University of Maryland Extension, and/or private consultants can do enough side-by-side Phosphorus Site Index/Phosphorus Management Tool comparisons in 2014 to provide valid results does not seem feasible.

Here are some of my concerns about the near-immediate implementation of this regulation. First and foremost, how can the Department of Agriculture even think about proposing a regulation that could cause such financial hardships on farm families when no meaningful economic impact analysis has been done?

Chicken Farms

- Denied the ability to use manure, a locally produced organic fertilizer, on their own crops, some chicken farmers will have to buy commercial fertilizer to replace chicken manure they already own. That will have a negative economic impact on the chicken growers.
- Chicken growers who have been selling their manure to other farmers may no longer have customers, thus a loss of income.
- Chicken growers who have had their chicken houses cleaned with manure removed from the farm without charge may now have to pay somebody to clean the houses and transport the manure since the cleaning/transporting company may not be able to sell the manure to make a profit and cover the costs of cleaning/transporting.

- Even if the MDA establishes the state storage sites, it will be the chicken growers' responsibility to transport the manure to the site, possibly creating a cost for the chicken growers.
- If the value of manure is lost, then alternative use companies might start charging a fee to accept manure, much like a landfill charges for disposal. If any alternative use companies start operating, and nothing of any magnitude appears to be on the horizon, they might charge a disposal fee instead of buying manure or accepting it for free.

Crop Farmers

- Denied the ability to use manure on their crops, crop farmers will have to buy commercial fertilizer to replace chicken manure that they have been using.
- Crop farmers who have used manure and not commercial fertilizers may have to buy or rent commercial fertilizer application equipment, thus raising their costs of doing business.
- Crop farmers wanting to hire a fertilizer applicator might find that there are not enough applicators or equipment in the short fertilizer application period to allow timely fertilizer applications. Increased demand in services will allow these applicators to raise their fees, thus higher costs for crop farmers.
- While commercial fertilizer will help a crop grow, the micronutrients and organic material in animal manure will help grow a larger crop. If yields are lessened due to the loss of organic material and micronutrients, then farmer income will diminish.
- Crop farmers and chicken farmers alike will most likely have to alter their business plans in ways that weaken their ability to withstand adverse growing conditions and/or markets – requiring new expenditures/capital purchases while at the same time artificially reducing their potential yields.
- Crop farmers could see increased effects of drought on their crops as a result of losing poultry litter's organic material that helps build up the soil's moisture retaining capabilities.

Once this regulation is in effect, as it appears it will be and contrary to the wishes of many in the agricultural community, there will be many negative effects to the farming community, individuals like me, and the entire state of Maryland without noticeable improvements in water quality.

Please, slow this down. Allow the scientific research to be completed and then allow an orderly phase-in much as the game-changing Water Quality Improvement Act of 1998 allowed a phase-in period. Without alternative uses of manure and cost effective replacements for this soon-to-be lost organic fertilizer, tremendous harm will come to the state of Maryland without improving the environment.

Respectfully yours,

PAUL W. TOWERS SR.

26829 BAKER RD

Insert printed name

Insert town

DENTON MD 21629



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Miller, Sarah <Sarah.Miller@perdue.com>
 To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Thu, Nov 14, 2013 at 10:29 AM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Sarah Miller

Salisbury, MD



Earl Hance (MDA) - Policy Director for MDA

OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

Harford, Isaac <Isaac.Harford@perdue.com>

Thu, Nov 14, 2013 at 11:08 AM

To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like voters across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Marylanders, we support the continued restoration of the Chesapeake Bay. This land and the bay are our homes. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families and the industries behind them has not been determined. These same voters have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Isaac Harford

Salisbury, MD

Isaac D. Harford,

Animal Geneticist, Heritage Breeders, LLC (a wholly owned subsidiary of Perdue Farms Inc.)

10789 Stewart Neck Road, Princess Anne, MD 21853

Office 410-341-2903, Mobile 479-462-4182, FAX 410-341-2909

"The principle of selection permits to the farmer not only to modify the characters of its flock but also to transform it. It is the magic stick which he can call to life all the forms and models he pleases."

Charles Darwin
Origin of Species

This communication, including attachments, may contain confidential, privileged, copyrighted or other legally protected information. If you are not the intended recipient, you are hereby notified that any use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please immediately re-send this communication to the sender and delete the original message and any copy of it, including all attachments, from your computer system.

478

November 13, 2013

Earl Hance, Secretary of Agriculture
Maryland Department of Agriculture
50 Harry S. Truman Parkway
Annapolis, Maryland 21401

Dear Secretary Hance,

I am a poultry farm owner who lives in Worcester County and I am extremely concerned about the Maryland Department of Agriculture's proposed regulation related to the Phosphorus Management Tool.

My main fear is that the proposed regulation will have huge impacts on the state's agricultural community, and the overall economy of the entire state of Maryland. This regulation will put Maryland farmers at an unfair disadvantage when competing with farmers in neighboring states. The regulation is based on incomplete research. The main researchers working on this from the University of Maryland have stated that their work is not done, yet the state is moving forward at breakneck speed for what appears to be political reasons. Research by the University of Delaware has shown that numbers being used by EPA to determine the amount of manure coming from poultry houses is inaccurate. This morning a study by the U.S. Geological Survey conducted on the Delmarva Peninsula, indicates it may take several decades for many water-quality management practices aimed at reducing population to the Bay to achieve their full benefit due to the influence of groundwater. It would seem that the state should be focusing on using real science to make a real difference and not bowing down to politics. Rather than being focused on how to support and improve the agricultural community, the department seems more concerned with appeasing the U.S. Environmental Protection Agency. If the farming sector in Maryland was lagging in achieving Chesapeake Bay Watershed Implementation Plan goals, then perhaps enhanced efforts would be needed, but as you (Secretary of Agriculture Hance) have stated, we are at 130% of the goal. That's an accomplishment that seems to be lost on Governor O'Malley, the Maryland Department of Agriculture, and the EPA.

Allowing an extended and orderly phase-in of the implementation date of the Phosphorous Management Tool will cause no environmental harm as shown by the research released today. For decades, the scientific and regulatory community told farmers not to worry about applications of phosphorus to the soil because unless the soil moved, the phosphorus would not move. Recently, that thinking changed and farmers began applying manures based upon their phosphorus content. The phosphorus levels in soils and waters were achieved over decades and will not be corrected for decades, even if this new regulation changes manure application procedures in 2015. Waiting a few more years to allow for an orderly phase-in will not cause any harm to our environment. An orderly phase-in will allow the agricultural community to adjust and make required changes. Additionally, we saw firsthand how difficult and time consuming it was for Maryland CAFO farmers to obtain a Comprehensive Nutrient Management Plan and to think the conservation districts, the University of Maryland Extension,

and/or private consultants can do enough side-by-side Phosphorus Site Index/Phosphorus Management Tool comparisons in 2014 to provide valid results does not seem feasible.

Here are some of my concerns about the near-immediate implementation of this regulation. First and foremost, how can the Department of Agriculture even think about proposing a regulation that could cause such financial hardships on farm families when **no meaningful economic impact analysis** has been done?

Chicken Farms

- Denied the ability to use manure, a locally produced organic fertilizer, on their own crops, some chicken farmers will have to buy commercial fertilizer to replace chicken manure they already own. That will have a negative economic impact on the chicken growers.
- Chicken growers who have been selling their manure to other farmers may no longer have customers, thus a loss of income.
- Chicken growers who have had their chicken houses cleaned with manure removed from the farm without charge may now have to pay somebody to clean the houses and transport the manure since the cleaning/transporting company may not be able to sell the manure to make a profit and cover the costs of cleaning/transporting.
- Even if the MDA establishes the state storage sites, it will be the chicken growers' responsibility to transport the manure to the site, possibly creating a cost for the chicken growers.
- If the value of manure is lost, then alternative use companies might start charging a fee to accept manure, much like a landfill charges for disposal. If any alternative use companies start operating, and nothing of any magnitude appears to be on the horizon, they might charge a disposal fee instead of buying manure or accepting it for free.

Crop Farmers

- Denied the ability to use manure on their crops, crop farmers will have to buy commercial fertilizer to replace chicken manure that they have been using.
- Crop farmers who have used manure and not commercial fertilizers may have to buy or rent commercial fertilizer application equipment, thus raising their costs of doing business.
- Crop farmers wanting to hire a fertilizer applicator might find that there are not enough applicators or equipment in the short fertilizer application period to allow timely fertilizer applications. Increased demand in services will allow these applicators to raise their fees, thus higher costs for crop farmers.
- While commercial fertilizer will help a crop grow, the micronutrients and organic material in animal manure will help grow a larger crop. If yields are lessened due to the loss of organic material and micronutrients, then farmer income will diminish.
- Crop farmers and chicken farmers alike will most likely have to alter their business plans in ways that weaken their ability to withstand adverse growing conditions and/or markets – requiring new expenditures/capital purchases while at the same time artificially reducing their potential yields.

- Crop farmers could see increased effects of drought on their crops as a result of losing poultry litter's organic material that helps build up the soil's moisture retaining capabilities.
- Organic farmers are not allowed to use commercial fertilizer but can use poultry manure to fertilize their crops based on USDA regulations. With the push to "Buy Local" and for small farmers to have direct sales to consumers this regulation will put many of the small local and organic farmers out of business.

Once this regulation is in effect, as it appears it will be and contrary to the wishes of many in the agricultural community, there will be many negative effects to the farming community, individuals like me, and the entire state of Maryland without noticeable improvements in water quality.

Please, slow this down. Allow the scientific research to be completed and then allow an orderly phase-in much as the game-changing Water Quality Improvement Act of 1998 allowed a phase-in period. Without alternative uses of manure and cost effective replacements for this soon-to-be lost organic fertilizer, tremendous harm will come to the state of Maryland without improving the environment.

Respectfully yours,

Richard E. Blevins
Twin Oak Farms
1128 Snow Hill Rd
Stockton, Maryland 21864



OPPOSITION TO PROPOSED MARYLAND PHOSPHOROUS MANAGEMENT TOOL REGULATION

... 11/14/2013

Penney, Karen <Karen.Penney@perdue.com>
To: "Earl.Hance@maryland.gov" <Earl.Hance@maryland.gov>

Thu, Nov 14, 2013 at 12:03 PM

Dear Secretary Hance;

My family and I are dependent upon the poultry industry and agriculture in Maryland. I would like to go on record in opposition to the Nutrient Management / Phosphorous Management Tool (PMT) regulation recently proposed by the Maryland Department of Agriculture (MDA). It is my position that the economic impact of this regulation on the poultry growers, poultry integrators and their employees, grain and soybean farmers with families like mine and the many businesses supporting agriculture in Maryland is huge.

Additionally, in my view, there is no practical, realistic, sufficient and timely plan proposed with this regulation for dealing with the estimated excess organic fertilizer that will result from the implementation of the PMT.

Furthermore, MDA is not allowing farmers directly impacted by this regulation enough time to evaluate its effect on their businesses and develop any workable alternatives. The modifications being developed for the Chesapeake Bay Model, the basis for the nutrient management/PMT regulation, will change the model's output relating to the amounts and impact of organic fertilizer. I, along with like taxpayers across Maryland, firmly request that the implementation of this regulation be put on hold until;

(1) A full economic impact study is completed, publicized, discussed

and its results incorporated into the regulation;

(2) Tested and proven plans are in place to deal with the excess organic fertilizer;

(3) Enough time is given to farmers that are directly affected to fully understand the impact of the Nutrient Management / PMT regulation on their specific farm, and understand what alternatives are available, and;

(4) Scheduled modifications to the Chesapeake Bay Model are made, the resultant effects determined, and those effects incorporated into any nutrient management / PMT regulation proposed.

Like most Maryland taxpayers, we support the continued restoration of the Chesapeake Bay. This land and the bay are used by our families. In many cases this has been through multiple generations. We recognize that this will take continued collective efforts by all of us. Importantly to consider is that agriculture has already made significant progress on the Chesapeake Bay Model and the PMT remain works in progress. Its impact on Maryland's farm families (where I grew up) and the industries behind them has not been determined. These same voters and taxpayers have not been afforded the time to adjust to regulations that could drastically alter their economic livelihood and the economy of the state.

Thank you for your consideration!

Karen Penney

Felton, DE

Karen.Penney@Perdue.com

This communication, including attachments, may contain confidential, privileged, copyrighted or other legally protected information. If you are not the intended recipient, you are hereby notified that any use, disclosure, dissemination, distribution, or copying of this communication, or any of its contents, is strictly prohibited. If you have received this communication in error, please immediately re-send this communication to the sender and delete the original message and any copy of it, including all attachments, from your computer system.

480
31648 Mitchell Road
Princess Anne, Maryland 21853
November 14, 2013

The Honorable Earl F. Hance
Secretary of Agriculture
Maryland Department of Agriculture
50 Harry Truman Parkway
Annapolis, MD 21401

RE: Proposed 'Phosphorus Management Tool' regulation

After attending the meetings in Salisbury and Easton on the proposed Phosphorus Management Tool (P)
I have the following comments.

This legislation will be more restrictive than the current P-Site Index. It is designed to be more sensitive to the movement of Phosphorus when the true movement of it is not known. No indicated studies were introduced to define the amount of movement we currently deal with throughout the shore.

Nor is the amount of P in the soil now throughout the Eastern Shore of Maryland known because of the extremely small number of samples taken by researchers. For this to be a credible study samples should be numbered in the thousands, and distributed over the entire shore. It would be more credible as well if the samples were taken by a neutral party not associated with those who have agendas.

For years in the past the amount of fertilizer, including the amount of P, was applied based on then recognized amounts. Though this amount was reduced over the years to 5 tons/acre in 1996, and further to 2 tons every 3 years. The amounts of P in the soil in residual amounts may be high in some cases because of the former use of large amounts of fertilizer including P.

Large amounts of P in the soil does not indicate the availability of it for plant use. Again because of the unknown rate of movement and because high amounts of P in the soil is not always available to plants, as was indicated by one grower who had plant tissues tested for P content.

Agriculture is the lifeblood of the Eastern Shore. No economic study was presented at these meetings to show the impact on farmers should this legislation become law. These meetings were purported to favor the use of poultry litter as a fertilizer source. Farmers whose land shows high in the amounts of P will not be able to use available poultry litter as a fertilizer, requiring the application of expensive commercially available chemical fertilizer. And no economic study has been done.

If this legislation becomes law those who transport manure will be adversely affected as well. And, the amount of truck traffic to redistribute manure will be huge. More unnecessary traffic on our highways.

One can say that the driver of this legislation is the governor, and others working to influence him. Are we to react to their demands without knowing the economic consequences to our people? Are we looking at another lawsuit on a farmer with the UMD law school helping the prosecution? Or are we going to do the research necessary, and take the time necessary, to know what we are doing before proceeding with this PMT?

Sincerely
William C. Benson



earl.hance@maryland.gov - 11/14/2013 12:58 PM

Fwd: PMT**David Hancock** <dhancock93@yahoo.com>

Thu, Nov 14, 2013 at 12:58 PM

To: "earl.hance@maryland.gov" <earl.hance@maryland.gov>

Sent from my iPhone

Begin forwarded message:

From: David Hancock <dhancock93@yahoo.com>**Date:** November 14, 2013 6:35:37 AM EST**Cc:** Daetwyler Dean <ddaetwyler@gmail.com>, Melinda Rice <ricefarms3@gmail.com>, Wathen Pat <pwathen.ccfb@yahoo.com>, Warring Francis <fwarring@umd.edu>, Susan Boarman <susanboarman55@gmail.com>, Milly B Welsh <graden2@verizon.net>, "kmgoddard@yahoo.com" <kmgoddard@yahoo.com>, "krichards410@gmail.com" <krichards410@gmail.com>, "kevinwarring@gmail.com" <kevinwarring@gmail.com>, "jcherbert@rocketmail.com" <jcherbert@rocketmail.com>, Mike Amoss <mamoss21@yahoo.com>, Walter Steve <strawman25@aol.com>, Swann Frank <swanncci5@verizon.net>, Rice William <ricefarms3@aol.com>, Lines David <dave.lines@earthlink.net>, Herbert Addison <herbertfarm@msn.com>, Abell Wanda <wjabell@gmail.com>, Boarman Bobby <sssparke@earthlink.net>, Bowling Chip <tobaccoman123@aol.com>, Culver Bru <BLCULVER_TASCO@ATT.NET>, Hancock Sheila <motherofive37@aol.com>, Valerie Connelly <valeriec.mdfb@verizon.net>, James Raley <jkraley@toad.net>**Subject:** PMT**Reply-To:** David Hancock <dhancock93@yahoo.com>

Mr. Hance,

Please consider the attached letter on behalf of the Charles County Farm Bureau.

Thank you,

David Hancock Jr

**PMT.docx**

14K

November 14, 2013

The Honorable Earl F. Hance
Secretary of Agriculture
Maryland Department of Agriculture
50 Harry Truman Parkway
Annapolis, MD 21401

Re: Proposed Regulation to Adopt the Phosphorus Management Tool

On behalf of the Charles County Farm Bureau, I am asking that the proposed Phosphorous Management tool be withdrawn by MDA. We believe that this tool, if implemented will have long term negative effects on Agriculture in the entire State of Maryland. We feel that it is not necessary to implement the PMT because farmers have already excided the bay cleanup goal by 130%. This proves that what we have already implemented is working, and we are doing more than our fair share to clean up the bay that we all love. Also the PMT would greatly restrict the amount of Natural, organic fertilizer that can be applied to our crop land. The organic fertilizer would be replaced by chemical forms of fertilizer, which even the environmentalist community agrees is far worse than organic fertilizer.

The new PMT would also have dire economic consequences for farmers on both sides of the shore. Both Poultry and grain farmers have business plans developed with Poultry litter in mind. Poultry farmers will now have to pay to have the litter removed, instead of selling it to other farmers. Farmers who use the litter for fertilizer will now have to buy more expensive chemical forms of fertilizer. The PMT will only continue to hurt agriculture in a time when we are trying to save it. I ask that you would strongly consider withdrawing the PMT.

David Hancock Jr.

President

Charles County Farm Bureau

482

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S. Truman Parkway
Annapolis, Maryland 21401

RECEIVED

NOV 12 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

Dear Dr. Mercer:

I am extremely concerned about the Maryland Department of Agriculture's proposed regulation related to the Phosphorus Management Tool

My first fear is that the proposed regulation, which will have huge impacts on the state's agricultural community, is based on incomplete research. The University of Maryland researchers have stated that their work is not done, yet the state is moving forward at breakneck speed for what appears to be political reasons. Rather than being focused on how to support and improve the agricultural community, the department seems more concerned with appeasing the U.S. Environmental Protection Agency. If the farming sector in Maryland was lagging in achieving Chesapeake Bay Watershed Implementation Plan goals, then perhaps enhanced efforts would be needed, but as Secretary of Agriculture Earl Hance has stated, we are at 130% of the goal. That's an accomplishment that seems to be lost on Governor O'Malley, the Maryland Department of Agriculture, and the EPA.

Allowing an extended and orderly phase-in of the implementation date of the Phosphorous Management Tool will cause no environmental harm. For decades, the scientific and regulatory community told farmers not to worry about applications of phosphorus to the soil because unless the soil moved, the phosphorus would not move. Recently, that thinking changed and farmers began applying manures based upon their phosphorus content. The phosphorus levels in soils and waters were achieved over decades and will not be corrected for decades, even if this new regulation changes manure application procedures in 2015. Waiting a few more years to allow for an orderly phase-in will not cause any harm to our environment. An orderly phase-in will allow the agricultural community to adjust and make required changes. Additionally, we saw firsthand how difficult and time consuming it was for Maryland CAFO farmers to obtain a Comprehensive Nutrient Management Plan and to think the conservation districts, the University of Maryland Extension, and/or private consultants can do enough side-by-side Phosphorus Site Index/Phosphorus Management Tool comparisons in 2014 to provide valid results does not seem feasible.

Here are some of my concerns about the near-immediate implementation of this regulation. First and foremost, how can the Department of Agriculture even think about proposing a regulation that could cause such financial hardships on farm families when no meaningful economic impact analysis has been done?

Chicken Farms

- Denied the ability to use manure, a locally produced organic fertilizer, on their own crops, some chicken farmers will have to buy commercial fertilizer to replace chicken manure they already own. That will have a negative economic impact on the chicken growers.
- Chicken growers who have been selling their manure to other farmers may no longer have customers, thus a loss of income.
- Chicken growers who have had their chicken houses cleaned with manure removed from the farm without charge may now have to pay somebody to clean the houses and transport the manure since the

cleaning/transporting company may not be able to sell the manure to make a profit and cover the costs of cleaning/transporting.

- Even if the MDA establishes the state storage sites, it will be the chicken growers' responsibility to transport the manure to the site, possibly creating a cost for the chicken growers.
- If the value of manure is lost, then alternative use companies might start charging a fee to accept manure, much like a landfill charges for disposal. If any alternative use companies start operating, and nothing of any magnitude appears to be on the horizon, they might charge a disposal fee instead of buying manure or accepting it for free.

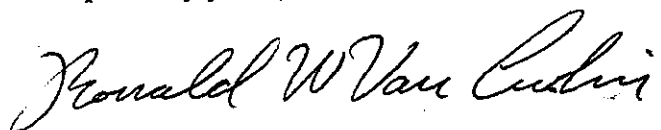
Crop Farmers

- Denied the ability to use manure on their crops, crop farmers will have to buy commercial fertilizer to replace chicken manure that they have been using.
- Crop farmers who have used manure and not commercial fertilizers may have to buy or rent commercial fertilizer application equipment, thus raising their costs of doing business.
- Crop farmers wanting to hire a fertilizer applicator might find that there are not enough applicators or equipment in the short fertilizer application period to allow timely fertilizer applications. Increased demand in services will allow these applicators to raise their fees, thus higher costs for crop farmers.
- While commercial fertilizer will help a crop grow, the micronutrients and organic material in animal manure will help grow a larger crop. If yields are lessened due to the loss of organic material and micronutrients, then farmer income will diminish.
- Crop farmers and chicken farmers alike will most likely have to alter their business plans in ways that weaken their ability to withstand adverse growing conditions and/or markets – requiring new expenditures/capital purchases while at the same time artificially reducing their potential yields.
- Crop farmers could see increased effects of drought on their crops as a result of losing poultry litter's organic material that helps build up the soil's moisture retaining capabilities.

Once this regulation is in effect, as it appears it will be and contrary to the wishes of many in the agricultural community, there will be many negative effects to the farming community, individuals like me, and the entire state of Maryland without noticeable improvements in water quality.

Please, slow this down. Allow the scientific research to be completed and then allow an orderly phase-in much as the game-changing Water Quality Improvement Act of 1998 allowed a phase-in period. Without alternative uses of manure and cost effective replacements for this soon-to-be lost organic fertilizer, tremendous harm will come to the state of Maryland without improving the environment.

Respectfully yours,



Mr. Ronald W. Van Culin
34263 Maryland Line Rd.
Galena, MD 21635

480

October 19, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S Truman Pkwy
Annapolis, MD 21401

RECEIVED

NOV 12 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

Dear Mrs. Mercer,

I am writing to oppose the upcoming requirement that all Maryland nutrient management plans utilize the new, and untested, Phosphorus Management Tool (PMT). This tool will unfairly burden farm operations in my area by limiting and/or eliminating the option of poultry litter as an organic, slow release fertilizer. The costs associated with replacing poultry litter with an equivalent commercial fertilizer range from approximately \$100 to \$350 per acre. The additional costs associated with replacing litter as a nutrient source will place an unfair burden on Delmarva grain producers. In addition, poultry farmers will suffer as no viable option currently exists to take the manure generated on their farms, thus the costs of reutilization will fall on their shoulders. While MDA argues that the manure transport program will handle the exportation of manure, the reality is the trucking resources and cost recovery processes do not exist. Relocation of poultry litter on the scale required to satisfy the requirements under the PMT are not feasible, period!

Delmarva farmers and MDA through cost share programs have made considerable investments in storage, spreading equipment and manure management tools to minimize the environmental effects of poultry litter while maximizing the benefits to soil health and crop production. The PMT will render these investments useless and require similar and redundant investments wherever the ultimate fate of the manure resource proves to be.

I urge you to delay the implementation of the new PMT to enable thorough testing of the science behind the tool, give time for alternative uses to develop, and for farmers to find suitable and cost effective replacements for organic fertilizer that will be outlawed on most soils.

Sincerely,

Signature

Printed Name Howard Spencer Waller

Street Address 6396 Cherry Walk Rd. P.O. Box 89

City, State, Zip Quantico, MD 21856

484
Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S. Truman Parkway
Annapolis, Maryland 21401

RECEIVED
NOV 12 2013
MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

Dear Dr. Mercer:

I am extremely concerned about the Maryland Department of Agriculture's proposed regulation related to the Phosphorus Management Tool

My first fear is that the proposed regulation, which will have huge impacts on the state's agricultural community, is based on incomplete research. The University of Maryland researchers have stated that their work is not done, yet the state is moving forward at breakneck speed for what appears to be political reasons. Rather than being focused on how to support and improve the agricultural community, the department seems more concerned with appeasing the U.S. Environmental Protection Agency. If the farming sector in Maryland was lagging in achieving Chesapeake Bay Watershed Implementation Plan goals, then perhaps enhanced efforts would be needed, but as Secretary of Agriculture Earl Hance has stated, we are at 130% of the goal. That's an accomplishment that seems to be lost on Governor O'Malley, the Maryland Department of Agriculture, and the EPA.

Allowing an extended and orderly phase-in of the implementation date of the Phosphorous Management Tool will cause no environmental harm. For decades, the scientific and regulatory community told farmers not to worry about applications of phosphorus to the soil because unless the soil moved, the phosphorus would not move. Recently, that thinking changed and farmers began applying manures based upon their phosphorus content. The phosphorus levels in soils and waters were achieved over decades and will not be corrected for decades, even if this new regulation changes manure application procedures in 2015. Waiting a few more years to allow for an orderly phase-in will not cause any harm to our environment. An orderly phase-in will allow the agricultural community to adjust and make required changes. Additionally, we saw firsthand how difficult and time consuming it was for Maryland CAFO farmers to obtain a Comprehensive Nutrient Management Plan and to think the conservation districts, the University of Maryland Extension, and/or private consultants can do enough side-by-side Phosphorus Site Index/Phosphorus Management Tool comparisons in 2014 to provide valid results does not seem feasible.

Here are some of my concerns about the near-immediate implementation of this regulation. First and foremost, how can the Department of Agriculture even think about proposing a regulation that could cause such financial hardships on farm families when no meaningful economic impact analysis has been done?

Chicken Farms

- Denied the ability to use manure, a locally produced organic fertilizer, on their own crops, some chicken farmers will have to buy commercial fertilizer to replace chicken manure they already own. That will have a negative economic impact on the chicken growers.
- Chicken growers who have been selling their manure to other farmers may no longer have customers, thus a loss of income.
- Chicken growers who have had their chicken houses cleaned with manure removed from the farm without charge may now have to pay somebody to clean the houses and transport the manure since the

cleaning/transporting company may not be able to sell the manure to make a profit and cover the costs of cleaning/transporting.

- Even if the MDA establishes the state storage sites, it will be the chicken growers' responsibility to transport the manure to the site, possibly creating a cost for the chicken growers.
- If the value of manure is lost, then alternative use companies might start charging a fee to accept manure, much like a landfill charges for disposal. If any alternative use companies start operating, and nothing of any magnitude appears to be on the horizon, they might charge a disposal fee instead of buying manure or accepting it for free.

Crop Farmers

- Denied the ability to use manure on their crops, crop farmers will have to buy commercial fertilizer to replace chicken manure that they have been using.
- Crop farmers who have used manure and not commercial fertilizers may have to buy or rent commercial fertilizer application equipment, thus raising their costs of doing business.
- Crop farmers wanting to hire a fertilizer applicator might find that there are not enough applicators or equipment in the short fertilizer application period to allow timely fertilizer applications. Increased demand in services will allow these applicators to raise their fees, thus higher costs for crop farmers.
- While commercial fertilizer will help a crop grow, the micronutrients and organic material in animal manure will help grow a larger crop. If yields are lessened due to the loss of organic material and micronutrients, then farmer income will diminish.
- Crop farmers and chicken farmers alike will most likely have to alter their business plans in ways that weaken their ability to withstand adverse growing conditions and/or markets – requiring new expenditures/capital purchases while at the same time artificially reducing their potential yields.
- Crop farmers could see increased effects of drought on their crops as a result of losing poultry litter's organic material that helps build up the soil's moisture retaining capabilities.

Once this regulation is in effect, as it appears it will be and contrary to the wishes of many in the agricultural community, there will be many negative effects to the farming community, individuals like me, and the entire state of Maryland without noticeable improvements in water quality.

Please, slow this down. Allow the scientific research to be completed and then allow an orderly phase-in much as the game-changing Water Quality Improvement Act of 1998 allowed a phase-in period. Without alternative uses of manure and cost effective replacements for this soon-to-be lost organic fertilizer, tremendous harm will come to the state of Maryland without improving the environment.

Respectfully yours,

Susan Marshall
Pittsille mo

Susan Marshall
34802 Mt Hermon Rd
Pittsille mo 21850

485
SHARON J. WELSH FARM
26786 Temple Road
Marydel, MD 21649
410-482-6324

RECEIVED

NOV 12 2013

MD DEPARTMENT OF AGRICULTURE
NUTRIENT MANAGEMENT PROGRAM
ANNAPOLIS

November 6, 2013

Jo A. Mercer, Ed.D.
Administrator, Nutrient Management Program
Maryland Department of Agriculture
50 Harry S. Truman Parkway
Annapolis, Maryland 21401

Dear Dr. Mercer:

The proposed regulation by the Maryland Department of Agriculture related to the Phosphorus Management Tool is another attempt by Government regulations to completely eliminate the smaller farmer in the State of Maryland.

The impact that this regulation will have on the state's agricultural community will place small farms in jeopardy of losing our livelihood. All the research is still incomplete. The University of Maryland researchers have stated that their work is not done, yet the state is moving forward with their own agenda. This is only a political move to appease the U.S. Environmental Protection Agency. If the farming sector in Maryland was lagging in achieving Chesapeake Bay Watershed Implementation Plan goals, then perhaps enhanced efforts would be needed, but as Secretary of Agriculture Earl Hance has stated, we are at 130% of the goal. Why will Governor O'Malley, the Maryland Department of Agriculture and the EPA not accept that farmers do not cause all the problems. Baltimore City and surrounding areas cause much more of their own share of polluting the Chesapeake Bay than farmers do.

Allowing an extended and orderly phase-in of the implementation date of the Phosphorous Management Tool will cause no environmental harm. For decades, the scientific and regulatory community told farmers not to worry about applications of phosphorus to the soil because unless the soil moved the phosphorus would not move. Recently, that thinking changed and farmers began applying manures based upon their phosphorus content. The phosphorus levels in soils and waters were achieved over decades and will not be corrected for decades, even if this new regulation changes manure application procedures in 2015. Waiting a few more years to allow for an orderly phase-in will not cause any harm to our environment. An orderly phase-in will allow the agricultural community to adjust and make required changes. Additionally, we saw firsthand how difficult and time consuming it was for Maryland CAFO farmers to obtain a Comprehensive Nutrient Management Plan

and to think the conservation districts, the University of Maryland Extension, and/or private consultants can do enough side-by-side Phosphorus Site Index/Phosphorus Management Tool comparison in 2014 to provide valid results does not seem feasible.

When Chicken Farms are denied the ability to use manure, a locally produced organic fertilizer on their own crops, they will have to purchase Commercial fertilizer to replace chicken manure that they already own. **DO YOU HAVE ANY IDEA HOW MUCH THAT WILL COST????**

Chicken growers who have been selling their manure to other farmers will lose a viable income thereby losing more of the income. **MORE LOSS OF PROFIT!!!!**

Chicken growers who have had their chicken houses cleaned with manure removed from the farm without charge will now have to pay somebody to clean the houses and transport the manure since the cleaning/transporting company may not be able to sell the manure to make a profit. **MORE LOSS OF PROFIT!!!!**

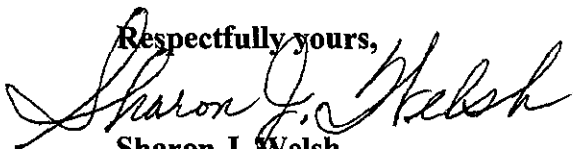
Even if the MDA establishes the state storage sites, it will be the chicken growers' responsibility to transport the manure to the site, more cost to the grower. **MORE LOST PROFIT!!!!**

If the value of manure is lost, then alternative use companies may start charging fees to accept manure, much like a landfill charges for disposal. If any alternative use companies start operating nothing of any magnitude appears to be on the horizon. They might charge a disposal fee instead of buying manure or accepting it for free. **ADDED COST TO GROWERS!!!**

YOU ARE TRYING VERY HARD TO PUT THE SMALL CHICKEN GROWERS OUT OF BUSINESS. WHY???? I feel that this is nothing more than a political ploy to maneuver the farmers in the State of Maryland to go out of business. **YOU ARE CAUSING HARDSHIP FOR EACH AND EVERY FARMER IN THE ENTIRE STATE OF MARYLAND.**

Please slow this down. Allow the scientific research to be completed and then allow an orderly phase-in much as the game-changing Water Quality Improvement Act of 1998 allowed a phase-in period. Without alternative uses of manure and cost effective replacements for this soon-to-be lost organic fertilizer, tremendous harm will come to the state of Maryland without improving the environment.

Respectfully yours,



Sharon J. Welsh

**Sharon Welsh Farm
26786 Temple Road
Marydel, MD 21649**



Regarding the PMT Regulations

minh vinh <vinhbminh@yahoo.com>

Thu, Nov 14, 2013 at 1:44 PM

Reply-To: minh vinh <vinhbminh@yahoo.com>

To: "earl.hance@maryland.gov" <earl.hance@maryland.gov>

Cc: minh vinh <vinhbminh@yahoo.com>

Secretary Earl D. Hance
Maryland Department of Agriculture
50 Harry S Truman Parkway
Annapolis, Maryland 21841

Dear Secretary Hance:

My name is Minh Vinh, a chicken grower, who lives in Worcester County and I am extremely concerned about the Maryland Department of Agriculture's proposed regulation related to the Phosphorus Management Tool.

I came to Eastern Shore 6 years ago with a dream that I can support my family and raise my kid by working in chicken farm. It has been everything that I was looking for. All my kids are attending Pocomoke school, a very good school, and I have a steady income by growing chicken with Perdue. The work is hard but it is worth it.

About few months ago, when I started learning about the new PMT regulation, I have a lot of concerns about the impact of this regulation.

No one can tell me that what will be the economic impact to the chicken industry and to me personally? I've been using manure as a trade value for cleaning the chicken house and transport the manure out of my farm may now that I have to pay somebody to do that. Even if MDA establishes the state storage sites, it will be my responsibility to transport the manure to the site and it will cost even more. Yet, the time to clean and move manure will be longer since the local farmer can't take my manure, therefore it will be longer for me to place the chicken back.

I have too many concerns and I ask you to stop this regulation, allow the scientific research to be completed, the questions have answer then implement the method.

Respectfully yours,
Minh Vinh
Snow Hill, MD



(no subject)

1 message

Michelle Protani-Chesnik <mchesnik@gmail.com>

Thu, Nov 14, 2013 at 3:15 PM

To: "Dr Jo Mercer, ED.D" <jo.mercer@maryland.gov>

Cc: Earl.Hance@maryland.gov

November 11, 2013

Jo A Mercer Ed.D.

Administrator, Nutrient Management Program

Maryland Department of Agriculture

50 Harry S Truman Parkway

Annapolis, Maryland 21401

Dear Dr, Mercer,

I am writing to you today in reference to the proposed Phosphorus Management Tool, in hopes that you will understand my concerns with this regulation. I fear it will cause many negative economic impacts on farm families, rural communities and agriculture in general through out Maryland. The damages from this politically driven regulation have the potential to wreak economic and environmental havoc that will take decades to repair.

Please allow time for an Economic impact study and sound Science before rushing into the implementation of this regulation.

I am a no land family poultry farmer in Wicomico County, Maryland. This means I only raise chickens and depend on local farmers via Ellis Farms to remove poultry litter from my farm. I will face a loss of at least 18% of my annual income, money that is already being used to pay other farm expenses. I will need

to let other debt or living expenses go so that I can use these already allocated monies to cake out chicken houses, store it in barns and when they are filled in 5 or 6 months pay for trucks to haul it to the (still location unknown) State Sites. The 18% does not include hauling it off. I am struggling to find affordable health insurance, since our insurance been cancelled, thanks to the other helpful government act known as Obama Care. I really don't know if we will survive O'Malley Care for Agriculture.

Below I have listed some of the reasons that this needs to wait for implementation;

The State has no true idea of how much poultry litter is available.

I have submitted an annual implementation nutrient form for many years.

Oddly until I asked the question as to how much poultry litter is produced each year at a DPI meeting in 2009. I wasn't aware that the amount of poultry and other animal fertilizer was never tabulated from those AIR forms. You cannot imagine my shock when we were sitting there discussing the Bay model and MDA (Royden Powell) "tells me we have no numbers". **Why turn in data if no one uses it?**

Manure transport alone will not take care of the litter excess if we implement the Phosphorus tool.

Alternative use options are not up and running and will not be for at least a few years

Maryland to date has failed at all alternative use projects. ECI has been 2 years, still not started. Green Planet should be done in 15 months, gone back to California, no site even chosen. Individual farm project, given funding by the state is on a farm but still doesn't work, searching for parts.

Hoarding litter on State properties will not solve the problem either. Hoarding litter on State grounds is not an environmentally sound option either, when you consider that we will also need to find places to hoard human waste as well.

Grain farmers and vegetable farmers will face extreme economic hardship with the need to spend at the very least a 115.00 an acre to substitute commercial fertilizer. Organic farmers can only use poultry litter for production.

Some crops such as potatoes and watermelons must have phosphorus to grow.

Agriculture in Maryland deserves more than an 80,000, 8 month, WIP driven Bare bones scientific study prior to implementation.

Another consideration is that the Phosphorus Management tool only, measures **the phosphorus in the soil in the field** it does not measure and **was not designed to measure the phosphorus leaving the field**. What does this tool really tell us about Bay health? I believe it does nothing to prove or disprove that the field phosphorus levels impact the Bay. Year after year the field levels remain basically the same. The crop takes up the phosphorus in the poultry litter that is spread and at the end of the crop cycle the level is back to the level it was before spreading poultry litter. Are we spending millions to implement something that does not tell the true facts?

It is morally and economically wrong to bring harm to so many families and businesses as the State of Maryland as this regulation will.

Please stop the implementation of this regulation until we know the ramifications of it.

Sincerely,

Michelle Protani-Chesnik

Michelle Protani-Chesnik
8128 Green Lewis Road
Willards Maryland 21874

Michelle Protani-Chesnik
8128 Green Lewis Road
Willards, Maryland 21874



Phosphorous Tool

Greg Griffith <Greg.Griffin@ivescollc.com>
To: Earl.Hance@maryland.gov

Thu, Nov 14, 2013 at 2:29 PM

Please read the attached letter in opposition to this regulation.

Greg Griffith

Territory Manager

Ivesco

Cell:443-859-3204

Warehouse:

285 Oakwood Drive

Harrisonburg, VA 22801

Office: 540-433-2761

800-241-6542

Delmar MD Warehouse

443-359-5690

 **Greg Griffith.docx**
12K

Greg Griffith

514 East Main Street

Fruitland, MD 21826

October 23, 2013

To Whom It May Concern,

I am writing this letter in opposition to the proposed phosphorous tool. This proposed regulation will be devastating not only to the farmers, poultry growers and integrators, but to the economy as a whole on the Eastern Shore. I have worked in the poultry industry for 20 years. Most of that time was with Perdue Farms Incorporated with its corporate base located in Salisbury Maryland. As part of Perdue, I personally worked on a project that partnered with EPA to ensure that the growers were following a NMP that was approved by the state as well as maintaining proper storage and onsite clean up at the farm. Over the years, nutrient management has been a huge part of the agricultural community and it has vastly improved the way manure is handled. Better equipment, guidance and knowledge have allowed the agricultural community to maximize production while protecting the environment. These people do not in any way want to harm the environment nor do they want to lose their way of life!

I am still employed in the poultry industry as a sales representative for poultry supplies. If this regulation passes many of my friends and colleagues will no longer be employed. It will be the fall of the agriculture industry on the Shore and thousands of people will lose their jobs, homes and way of life. If you know anything about trickle down economics, you will understand that thousands of more people will be affected by this regulation. All the tax dollars and income that the agricultural community pumps into the economy will be lost. Every business on the shore will feel the economic impact. If there is no agriculture left on the Shore, there are no jobs! The State of Maryland has regulated and taxed almost every viable industry until they close the doors or pack up and go to another state. The agricultural industry is all that is left and you are trying your hardest to make it disappear as well.

It is a shame that no one will look at the real areas of concern when it comes to bay pollution. You continue to blame the farmers yet when you drive down route 50 to the bay bridge, the homes that are built right on the water aren't owned by the farmers. Those beautiful lawns and landscaping don't come without the use of chemicals. How many small towns along the tributaries are operating sewer plants that are outdated and in need of repair, dumping into the rivers? How much of the pollution is coming from the tributaries that come into the bay from other states?

The agricultural community is going above and beyond to work with the state and local governments. It is a shame that they are persecuted as the bad guys. I am urging you to reconsider the passing of this regulation. I am urging you not to put an end to the way of life for thousands of families including mine.



PMT

Jason Scott <jescott81@gmail.com>

Thu, Nov 14, 2013 at 2:36 PM

To: Earl.Hance@maryland.gov

I'm writing to send comments on the new PMT regulations. I have three major comments or points of contention with the regulations.

1. Is a phase in approach possible? Why are we rushing to create new regulations with new science when Maryland farmers have already attained 130% of the current TMDL for Phosphorus. When Drs. McGrath and Coale began this research, they undoubtedly did not expect it to be used to create regulations when it had barely gotten a chance to be peer reviewed. Further, the rest of the bay watershed is in the process of evaluating this tool for their own Nutrient Management considerations. Why can't Maryland allow some time for the science to be further studied, and for farmers to try out the tool for a few years before it is written in to regulations. Finally, John Clune of USGS recently completed a study of Nitrogen in groundwater that stated that "the median age for ground water and nitrogen in the Chesapeake Bay ranges from 20 to 40 years." Utilizing this data, it is evident that we should just now be starting to see the improvements in the bay that were brought forth by the Nutrient Management law which was passed in 1996. It took centuries for the bay to get to the state that it is today, and it will at least take decades, if not centuries to make the improvements that are needed.
2. By current University of Maryland regulations, MD farmers can use a phosphorus starter containing no more than 30 lbs. of Phosphorus per acre even in high P soils. I would like that to be maintained because Phosphorus is very beneficial to a corn plants' early growth. In the case of 2013, a year with cold wet soils, starter saved a lot of corn crops and helped them get off to a faster start. I don't see where this is addressed in the legislation.
3. Finally, I think that no matter the soil phosphorus, if a producer takes a tissue sample of their crop and it is phosphorous deficient they should have the ability to rescue that crop with foliar phosphorus. I believe the same thing should be true with Nitrogen and I see nowhere in Nutrient Management regulations that allow for the tissue tests, which are the most accurate barometer of the nutrients that are truly in the plant.

Thank you for your consideration.

Regards,

Jason E. Scott
Certified Farm Nutrient Management Consultant
Walnut Hill Farms
Scott's Seed, L.L.C.
443.521.0080

490

ANDY HARRIS, M.D.
FIRST DISTRICT, MARYLAND



COMMITTEE ON APPROPRIATIONS

SUBCOMMITTEES
COMMERCE, JUSTICE, SCIENCE

LABOR, HEALTH AND HUMAN SERVICES,
EDUCATION

LEGISLATIVE BRANCH

Congress of the United States
House of Representatives
Washington, DC 20515

November 14, 2013

1533 LONGWORTH HOUSE OFFICE BUILDING
WASHINGTON, D.C. 20515
PHONE: 202.225.5311

15 CHURCHVILLE ROAD, SUITE 102B
BEL AIR, MARYLAND 21014
PHONE: 410.588.5670

212 WEST MAIN STREET, SUITE 204B
SALISBURY, MARYLAND 21801
PHONE: 443.944.8624

100 OLDE POINT VILLAGE, SUITE 101
CHESTER, MARYLAND 21519
PHONE: 410.643.5425

WWW.HARRIS.HOUSE.GOV

The Honorable Earl D. Hance
Secretary, Maryland Department of Agriculture
50 Harry S. Truman Parkway
Annapolis, Maryland 21841

Dear Secretary Hance,

I appreciate this opportunity to provide comments regarding the Maryland Department of Agriculture's (MDA) proposed regulation related to the Phosphorus Management Tool (PMT). As you know, I represent Maryland's First Congressional District, where a significant part of our local economy is represented by the agriculture and poultry industries. Although this is a state regulation and I am sensitive to Maryland's sovereignty on this state regulation, since the impetus for the action is the Federal Clean Water Act and Watershed Implementation Plans required by the U.S. Environmental Protection Agency (EPA), I wanted to be sure to share my comments and input. My staff attended the briefings in Easton and I have been in regular contact with the Maryland Farm Bureau, the Delmarva Poultry Industry (DPI), individual farmers and other stakeholders to ensure that I fully understand their concerns and can help to represent the interests of my constituents.

There can be no doubt that the proposed PMT regulations will have a tremendous and very burdensome impact on the state's agricultural community especially on the Eastern Shore. Unfortunately, the current proposal appears to be based on incomplete research rather than sound science. Even researchers from the University of Maryland agree that their work is not done, yet the state appears to be moving forward in finalizing the regulation despite a lack of consensus with neighboring states in the Chesapeake Bay watershed, and broad concerns among the agricultural community. Maryland farmers have not only achieved their Chesapeake Bay Watershed Implementation goals, but significantly exceeded them (130% of goal). Given this remarkable progress and the yet unproven benefits of the proposed regulation, it seems both unwise and unfair to add additional limitations on these hard-working Marylanders' ability to do the work them and their families have done for generations. I find it simply unacceptable that the cost impact of the proposal on our farming community was never considered. I find that hard to believe in the current economic condition in which we find our state and our nation.

At the very least, prior to the finalization of this regulation, MDA should first complete an economic impact analysis of how this regulation will impact the agricultural community. Imposing such hardship on the farming community without adequately taking into account the economic impact is bad public policy. I have spoken to the many poultry growers who will no longer be able to utilize

locally produced organic fertilizer and instead be forced to buy more expensive chemically-derived commercial products. Those who sell manure to local farmers will no longer have customers, and as a result will be forced to develop new arrangements for cleaning out chicken houses and transporting the manure. If the value of manure is lost, companies may stop accepting it for free, and begin charging a fee to accept the manure instead – much like a landfill. These blows to an already struggling industry and the Eastern Shore economy at the worst possible time must be undertaken judiciously, with a full understanding of the costs – and benefits – involved.

In addition to poultry growers, the proposed regulation negatively impacts our crop farmers. Since many will no longer be able to use chicken manure as fertilizer, they will be forced to purchase much costlier commercial fertilizer instead. This may also force them to purchase or rent new equipment and require the hiring of otherwise unnecessary staff to apply the new fertilizer. Given the short application time period, it may be impossible for crop farmers to rent equipment and hire applicators in a timely fashion which will, in turn, diminish crop yields and drive up costs, both effecting profitability already at painfully low margins.

Although I was pleased that MDA recognized the concerns of farmers by briefly delaying the rulemaking process earlier this year, I am disappointed that the revised proposed rule does not address specific concerns with regard to the effective date of the rule. While the revised effective date of January, 2015 is a small improvement from the original proposed date of September, 2013, there is still too much work to be done before imposing the rule, including the completion of the scientific research currently being conducted by the University of Maryland. Sound agricultural policy should always be based on facts, and complete scientific information is simply not available at this time.

Allowing an extended and orderly phase-in of the PMT implementation date will give the agricultural community adequate time to adjust their business plans and practices to accommodate the required changes which will minimize its economic impact without causing harm to the environment. Implementation without additional time to plan will have a significant, negative impact on the economy of the entire Eastern Shore without significantly improving the health of our environment. I urge you to reconsider allowing the agricultural community time to adjust to the significant changes required by the rule, while allowing the necessary scientific research and economic analyses to be completed prior to implementation. I also believe that any farmer should be allowed to use phosphorous in amounts equal to that taken up by their crops.

Thank you for allowing me to share my comments with you. I look forward to working with you in support of Maryland's agricultural community and the Chesapeake Bay Watershed.

Sincerely,



Andy Harris, M.D.
Member of Congress

MID SHORE REGIONAL
COUNCIL
8737 BROOKS DRIVE
SUITE 101
EASTON, MD 21601



MID-SHORE REGIONAL COUNCIL

Phone: 410.770.4798

Fax: 410.770.5398

www.midshore.org

November 14, 2013

Secretary Earl F. Hance
Maryland Department of Agriculture
50 Harry S Truman Parkway
Annapolis, Maryland 21401

Dear Secretary Hance:

The Mid-Shore Regional Council (MSRC) has strong concerns regarding the Department's proposed Phosphorous Management Tool (PMT) regulations and their implications for agriculture in the region.

The MSRC operates as a cooperative regional planning and development agency within Caroline, Dorchester, and Talbot Counties to foster physical, economic, and social development. Therefore, the Council understands how important a healthy and thriving agricultural economy is to the broader health of our region's economy.

Although the Council fully supports a clean and healthy Chesapeake Bay, these proposed regulations and the immediacy with which the Administration is insisting they be adopted will have drastic consequences on farmers involved in all sectors of production agriculture, but particularly on the poultry sector.

Allowing an extended and orderly phase-in of the implementation date of the Phosphorous Management Tool will cause no environmental harm and minimal disruption to agricultural operations in the region.

We know that agricultural production already requires significant investment and outlays of capital. Unfortunately, the proposed PMT regulations will force producers to drastically alter their business plans, add and/or increase costs for commercial fertilizer, likely require additional capital expenditures for new equipment/storage buildings, reduce soil health, and in most cases reduce yield potential.

In light of such significant concerns and so many additional unanswered questions, please slow implementation of this regulation down. In order to minimize economic harm to the region's farmers, the MSRC asks that you allow the scientific research to be completed along with an economic impact study and afterwards move forward with an orderly phase-in period.

Sincerely,

Scott Warner
Executive Director

Executive Board

Dirck Bartlett

Chairman

Talbot County Council

Jeff Ghrist

First Vice Chairman

Caroline County Commissioner

Ricky Travers

Second Vice Chairperson

Dorchester County Council

R. Andrew Hollis

Third Vice Chairman

Talbot County Council

Walter Chase

Secretary

Trappe Commissioner

Kurt Fuchs

Treasurer

Gale Nashold

Member At Large

Allen Nelson

Member At Large

Delegate Jeannie Haddaway-
Riccio

District 37 B



Phosphorus Management Tool

Paul Chesnik <pchesnik@gmail.com>

Thu, Nov 14, 2013 at 4:55 PM

To: jo.mercer@maryland.gov

Cc: MDA <Earl.Hance@maryland.gov>

I am a no land family poultry farmer living in Willards, Maryland. The new proposed regulations at MDA will cause a reduction of income from 17 to 22 percent.

I will now have to pay for clean-out

I will now have to pay to have the litter move to a undisclosed state location

I will now have to pay for snow removal

Other then the additional expenses, it is plain wrong for the State of Maryland to castrate the agricultural community with more un-proven environmental regulations. The agricultural community has done more then any other segment in the state to help clean the bay.

I am tired of promises of an equal playing field. I am tired of being told we are not Delaware where their Department of Agriculture fights the E.P.A. for the farmers and does not impose unnecessary regulations against those who cultivate the land, raise poultry or livestock.

It is time that the Maryland Department of Agriculture to stand up for the farmer and stop being a lobbyist for the environmentalists.

Paul Chesnik

8128 Green Lewis road

Willards, MD 21874

410-835-8419

pchesnik@gmail.com

493

November 15, 2013

The Honorable Earl D. Hance
Secretary, Maryland Department of Agriculture
50 Harry S. Truman Parkway
Annapolis, Maryland 21841

Dear Secretary Hance:

As a candidate for the newly-created Maryland 38C legislative district, I am joining with our Eastern Shore farm families, members of the Delmarva Poultry Industry and Maryland Farm Bureau, and the local business community to request an immediate withdrawal of the Maryland Department of Agriculture's proposed regulations related to the Phosphorous Management Tool (PMT) and to allow time for an economic evaluation, as well as, for an extended phase-in of any new PMT tool based on a cost analysis and sound science

After listening to individual families on their farms and attending the MDA briefings in Salisbury and Easton with approximately 400 concerned citizens at each forum, I strongly oppose moving forward with the proposed PMT regulations. It is simply unacceptable for the Maryland Department of Agriculture and our state government to impose new regulations without knowing the costly economic impact of the proposed PMT regulations and without the science to support that these proposed regulations would even improve the health of the Chesapeake Bay Watershed through reduced phosphorous leaving a farm.

Further, the proposed regulations do not take into account the improvements and efforts made by our Maryland farmers since the 2005 phosphorous implementation date of the Water Quality Improvement Act of 1998. Through Best Management Practices, Maryland farmers are doing more than their fair share in meeting the Chesapeake Bay Watershed goals and have exceeded them by 130 percent. Put simply, Maryland agriculture is the only sector to reach the Environmental Protection Agency's cleanup goals.

Also, since the EPA is considering changes to the current Chesapeake Bay Model, before the critical time period of 2017, which means reassignments of pollution responsibility by state and by sector, it only makes sense for the State of Maryland to wait for accurate model updates before proposing a new Phosphorous Management Tool. The updated Chesapeake Bay Model may indicate that Maryland farmers have already met their phosphorous reduction goals, without the need for a new PMT, or the updated research may point to a new approach based on sound science to meeting the Chesapeake Bay Watershed goals.

Even more disturbing is that you, Secretary Hance, may be considering even going further in regulating the Agriculture community, if municipalities cannot achieve and/or afford their WIP (Watershed Implementation Plan) by the Year 2017. It is almost impossible to expect the Agriculture community to accept almost the entire burden of the Chesapeake Bay Restoration program.

I believe the members of our Maryland farm community have proven their commitment over the years to meeting our Chesapeake Bay Watershed goals. As we move forward, I respectfully request that the Maryland Department of Agriculture consider this past progress, the economic impact of all proposed regulations, and sound science to ensure that any proposed regulations will improve the health of the Chesapeake Bay. I appreciate this opportunity to share my comments and look forward to working with you.

Sincerely,

Mary Beth Carozza
Candidate for State Delegate
Maryland District 38C