

Comment Register
Proposed Phosphorus Management Tool Regulation
November 19-20, 2013

No.	Source	Date Received	Form	Date Acknowledged	Form of Acknowledgement
691	Hoa N Tran	11/18/13	Fax Form Letter	11/19/13	mail
692	Hutchison Bros. - Travis Hut	11/20/13	Postcard		
693	Robert Hutchison	11/20/13	Postcard		
694	Eric Schrader	11/20/13	Postcard		
695	Frank K Covey	11/20/13	Postcard		
696	S Langford Anderson	11/20/13	Postcard		
697	W Drew Stabler	11/20/13	Postcard		
698	Alice Mason	11/20/13	Postcard		
699	P Thomas Mason	11/20/13	Postcard		
700	Outten Farms - William F Ou	11/20/13	Letter		
701	Worcester Soil Conservatio	11/20/13	Letter		
702	The Honorable Mary Beth C	11/20/13	Letter		
703	Brian J Smith	11/20/13	Letter		
704	Maryland Dairy Industry Ass	11/20/13	Letter		
705	Henry Landis	11/20/13	m Letter/Comments		
706	Ruth Landis	11/20/13	Form Letter Comments		

691
November 16, 2013

410-841 5914

Secretary Earl D. Hance
Maryland Department of Agriculture
50 Harry S Truman Parkway
Annapolis, Maryland 21841

Dear Secretary Hance:

WE / I am a chicken grower, who has a poultry farm in Wicomico 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 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, a huge 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.

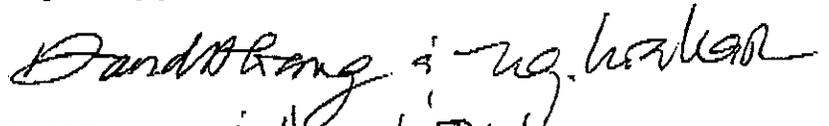
Crop Farmers

- 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 micro nutrients, 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,



David T. Hoang : HSA N. TRAN
 31093 Old Fruitland Rd.,
 Salisbury, MD 21804

"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 ask you to reconsider the PMT regulations. We need to come up with a solution that is reasonable. We need to get back to farming scientifically and not politically. I am in support of the MD F.B. and MD Grain Producers on this issue.

Thank You,

RECEIVED

NOV 19 2013

OFFICE OF THE SECRETARY

Sincerely,
Name: Travis Hutchison
Address: 10882 Lewistown Rd
Cordova MD. 21625
Phone: 410-820-2093
Email: hutchisonbrothers@hotmail.com

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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



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Dear Secretary Hance:

I am opposed to implementing the PMT as currently proposed. Because of the unknown cost to the livestock industry, (in moving manure, not being able to use manure, or grazing up to use manure) ask for a phased in approach.

1. Phase in over several years
2. Allow starter P on high P soils
3. Give protection for farmers storing manure (litter) in piles till spring.

Thank you for your consideration Bobby

RECEIVED

Sincerely,

Name: Robert Hertilison
 Address: 11283 Lewistown Rd
Cardova, Md. 21625
 Phone: 410 924 0085
 Email: _____

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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



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Dear Secretary Hance:

PLEASE TAKE A STEP BACK AND LOOK
AT WHOLE PICTURE. BEFORE MAKING FINAL
DECISION ON PMT REGULATION!

RECEIVED

Sincerely,

Name: ERIC G. SCHRADER
Address: 221 EDMORE ROAD
CHESTERTOWN, MD 21620
Phone: 410-810-0744
Email: _____

694

Our Farms, Our Future

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Dear Secretary Hance:

After listen to MDA's explanation of this regulation and several days of internet research on the subject I can only summarize that no one knows what real effect the 150 index will have on the bay. The question of economic impact on the "Red Foot" producers caused by this regulation has been completely overlooked. I ask you to stop this "TRAIN WRECK", AND address these issues.

RECEIVED

Sincerely,

Name: FRANK COVEY
Address: 24716 Auction Rd
Federalsburg Md.
Phone: 410-443-3845
Email: _____

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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



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Dear Secretary Hance:

1. Wait for research to be completed before PMT is forced on us. 2. You need impact studies on the cost to the grower. 3. Projected cost to my operation to be from \$125-\$150 per acre, additional fuel, commercial fertilizers, plus retrofitting my equipment. 4. It has yet to be proven that the movement of phosphorus from the farm land is the major pollutant. 5. My poultry operation has already been impacted by being unable to clean out the houses. How much more additional cost?

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Sincerely,
Name: S Langford Anderson
Address: 27301 Fellswood Rd
Princess Anne, MD 21803
Phone: 410-422-4509
Email: _____

696

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.

11-14-13

Dear Secretary Hance:

Please NO PMT regulations until we know more about what is happening in the soil. I believe that some of the studies underway will help sort out info that will help in making a sound decision in this area.

RECEIVED

Sincerely,

Name: W. Drew Stabler
Address: 5210 DAMASCUS RD
LAYTONSVILLE, MD 20882
Phone: 301-253-6733
Email: _____

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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.Pance@maryland.gov.

Dear Secretary Hance:

There is some work to be done before implementing PMT regulations. What are the exact costs of transporting this manure? I think these costs alone are going to be high. Are you sure using commercial fertilizers on high phosphorus fields is better than manure? How long does the phosphorus stay in the soil? If the phosphorus remains in the soil, are we sure it is going to wash into the bay? What should the phosphorus levels be?

RECEIVED

Sincerely,

Name: Alice Mason
Address: 23991 Melitote Rd.
Chestertown, Md. 21620
Phone: 410 778-0349
Email: fawnwood@gmail.com

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Our Farms, Our Future

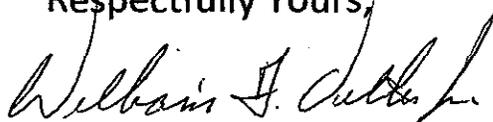
700

November 11, 2013

Dear Secretary Hance,

I am a Dorchester County Grain Farmer and I am extremely concerned about the Phosphorus Manage Tool that you propose. We are a seven generation family farm operation and use chicken manure which we purchase to use on ground where we grow corn. We have been seeing a large yield increase with this practice and could not grow the corn yield with commercial fertilizer in today's times due to fertilize prices. We feel that Maryland should slow down and allow the scientific research be completed like our neighbor states. Farmers as a whole are excellent people for the environment. If they were not their land would have been destroyed generations ago. Step-up and help protect the Family Farmer from the negative things the extreme environmentalist are trying to do.

Respectfully Yours,



*Outten Farms
4310 Elliot Island Rd.
Vienna, MD 21869*

Dorchester County

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NOV 20 2013

OFFICE OF THE SECRETARY

701



Worcester Soil Conservation District

304 Commerce Street - Snow Hill, MD 21863-1008 - Phone (410) 632-5439 (Press 3) - Fax (410) 632-2732

November 14, 2013

Mr. Earl Hance, Secretary
Maryland Department of Agriculture
50 Harry Truman Parkway
Annapolis, MD 21401

Dear Secretary Hance:

The Worcester Soil Conservation District is strongly opposed to the new "Phosphorous Management Tool". We feel it burdens the state's farmers with more unnecessary regulations. The farmers in this state have proven their willingness to use and adopt new technology which has reduced the use of fertilizer and animal manure over the last 15-20 years here in the State of Maryland.

We also feel that there has not been adequate research done on the economic impact that will be felt by the farmers of this state. In other words, is the state going to replace the lost fertilizer dollar value? Is the state going to pay for taking a resource out of the hands of the farmer?

We strongly urge you NOT to implement or support the new "Phosphorous Management Tool".

Sincerely yours,

A handwritten signature in black ink that reads "David A. Hudson".

David A. Hudson, Chairman
Worcester Soil Conservation District

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NOV 20 2013

OFFICE OF THE SECRETARY

Mary Beth
CAROZZA

FOR MARYLAND HOUSE OF DELEGATES, DISTRICT 38C

"Protecting our Shore Way of Life"

702

November 15, 2013

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NOV 20 2013

OFFICE OF THE SECRETARY

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.

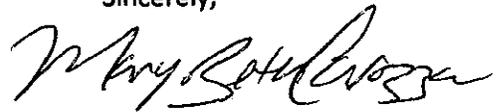
Further, the proposed regulations do not take into account the improvements and efforts made by our Maryland farmers since the 2005 phosphorous implementation date of the Water Quality Improvement Act of 1998. Through Best Management Practices, Maryland farmers are doing more than their fair share in 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,

A handwritten signature in black ink, appearing to read "Mary Beth Carozza". The signature is fluid and cursive, written in a professional style.

Mary Beth Carozza
Candidate for State Delegate
Maryland District 38C

703

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NOV 20 2013

OFFICE OF THE SECRETARY

Secretary Earl D. Hance
Maryland Department of Agriculture
50 Harry S Truman Parkway
Annapolis, Maryland 21841

Dear Mr. Hance,

I'm a poultry and grain producer in Caroline County as well as an employee for a local poultry company. I'm writing to you in regards to the proposed Phosphorus Management Tool (PMT), and the impact it will have on me and my family, and the community in which I live.

I fear that if the new tool is implemented as is, we will be strapped with the financial burden of not only disposing of the excess litter we produce but also supplementing the nutrients that we currently receive from poultry litter with bought commercial fertilizers.

I've been fortunate to have attended the public meeting you held in Talbot County and am thankful that you and your staff put the meeting together. During that meeting you and your staff spoke of how anybody with excess litter could sell it to their neighbors to help recoup the cost of buying commercial fertilizer. That theory may hold true if there wouldn't be the amount of land disqualified from using manure due to high p levels. Manure is just like any other commodity, the price is determined by supply and demand. With the amount of land not able to use poultry litter, the demand will be dramatically reduced while the supply dramatically increases, which will make the litter useless. I feel that over time this will also force us to pay to have the excess removed. I also understand that the state has a manure transportation program to help cover the cost of removing the manure, but what happens when that money runs out? I'm afraid that the state has seriously underestimated the cost to remove this excess manure and that over time the tax payers of Maryland are going to get tired of paying to remove it.

As an employee of a local poultry Integrator I also fear that if the state tries to pass the burden on to the Integrators, then eventually they will also get tired of the extra cost and move to an area that is more business friendly. These companies are competing in a global market and all cost associated with the production of their product has to be passed on to the consumer. This will just add another cost to produce poultry on Delmarva and put our companies at a cost disadvantage. I think one thing that we all can agree upon is that the poultry industry is the back bone of Agriculture in Maryland and without it we will have a hard time surviving.

Another thing everybody could agree upon is that the bay's health didn't deteriorate to this level over a 5 or 10 year period, it's been decades and decades in the making. Therefore I feel that is unrealistic that we can restore the bay in a short amount of time. I read in the local news papers about how the bay is starting to see some improvement in its health and how much the Agriculture sector has already greatly reduced its environmental impact. So why can't we stay the course and give our current regulations time to work? I feel that once the other sectors catch up to Agriculture in reducing their environmental impact we could then and only then achieve the goal of a healthier bay.

Thank you for taking the time to read my concerns.

Sincerely,

Brian J. Smith
Brian J. Smith



704



Maryland Dairy Industry Association

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Buddy Hance
Maryland Secretary of Agriculture
50 Harry S. Truman Parkway
Annapolis, MD 21401

NOV 20 2013

OFFICE OF THE SECRETARY

Recent changes to Maryland Nutrient Management regulations have been extremely difficult for Maryland dairy farmers. The ban on winter-hauling of manure has increased the need for expensive storage facilities. The heavy emphasis on incorporation may increase the likelihood of soil erosion and the greater loss of phosphorus. A more soil-friendly alternative is injection. This equipment is too expensive for smaller farmers to afford. They will have to rely on custom operators. Since the window to apply manure is now much smaller, all farmers will need their service at the same time, causing the potential for delayed planting and reduced yields.

The old Phosphorus Site Index was a useful tool to manage fields with high phosphorus values. It allowed much more flexibility than the new Phosphorus Management Tool (PMT). While most of the emphasis has been on the effect it will have on poultry operations on the Eastern Shore, there is an equal concern for the effect it will have on dairy farms in the Piedmont Region of central Maryland.

A quick geography lesson would tell us that the main contributors to the health or lack thereof of the upper Chesapeake Bay would be the Susquehanna River and the Conowingo Dam, as well as the cities that discharge their waste treatment near the Bay.

It is exceedingly unfair for the state of Maryland to continually put our farmers at an economic competitive disadvantage against farmers from neighboring states that do not have the same strict regulations. Farmers in this state have demonstrated they are good stewards of the land.

The state of Maryland should slow the process of promulgating costly new regulations until the other states in the Chesapeake Bay watershed catch up to our level of environmental stewardship.

The average age of farmers continues to go higher. The next generations of farmers are being discouraged by the poor economic feasibility of farming. More costly regulations only make this problem worse. The Maryland Dairy Industry Association strongly urges the Maryland Department of Agriculture to abandon the implementation of the new Phosphorus Management Tool.

Allen Stiles
President



Maryland Dairy Industry Association

23301 Mount Ephraim Road
Dickerson, MD 20842

705-706

Henry and Ruth Landis
24249 Bridgetown Road
Goldsboro MD 21636

November 14, 2013

Secretary Earl D Hance
Maryland Department of Agriculture
50 Harry S Truman Parkway
Annapolis MD 21401

RECEIVED

NOV 20 2013

OFFICE OF THE SECRETARY

Secretary Hance:

I am a 86 year old crop, dairy and poultry farmer in Caroline County and I am extremely frustrated and concerned about the Maryland Department of Agriculture's (MDA) 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, it is based on incomplete research. The University of Maryland researchers have stated that their work is not yet 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 and cleanup the Chesapeake Bay watershed, the department seems more concerned with appeasing the U.S. Environmental Protection Agency (EPA). If the farming sector in Maryland was lagging in achieving Chesapeake Bay Watershed Implementation Plan (WIP) goals, then perhaps enhanced efforts would be needed, but as you have stated, agriculture are at 130% of their goal. That's an accomplishment that seems to be lost on Governor O'Malley's awareness along with MDA and EPA.

Allowing an extended orderly phase-in of the implementation date of the PMT will cause no environmental harm. For decades, the scientific and regulatory community told farmers not to worry about application of phosphorus to the soil because unless the soil is moved, the phosphorus would not move out of the soil. Recently, that recommendation has changed and farmers began applying manure and fertilizer based upon their phosphorus recommendations according to soil and manure tests. The phosphorus levels in soils and waters have occurred over decades and will not be corrected for decades. Even if the proposed regulation that changes manure application it would not negatively impact the soil before 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 based on their farm operation. Additionally, we saw firsthand how difficult and time consuming it was for Maryland CAFO farmers to obtain a Comprehensive Nutrient Management Plan, implement the requirements, pay for the plan and to anticipate the local Soil Conservation Districts, University of Maryland Extension and/or private consultants can be trained and do enough side-by-side Phosphorus Site Index/PMT comparisons in 2014 to provide valid results do not seem feasible.

Here are some of my concerns about the near-immediate implementation of this regulation:

- How can MDA think about supporting and processing a regulation that could cause such financial hardships of farm families when no meaningful economic impact study has been completed?
- On poultry farms:
 - Denying the ability to utilize my manure, a locally produced “**organic**” fertilizer on my crops. I thought MDA was very supportive of organic production! I would have to purchase commercial fertilizer to replace my own manure which I don’t have to buy!
 - If I had an excess of poultry manure, transporting is not an option, our farming operation does not have a truck that is legal to be driven on the road to transport the manure which means I would have to take a reduction in sale price because of not delivering my manure to the buyer or hire a truck to transport my manure.
 - There may not be a market for my manure due to the levels of Phosphorus in soils on surrounding farm operations.
 - During the season when manure cannot be applied, storing manure will become a problem because of not being able to use and spread my manure during the time I’m allowed to apply. My manure building will not hold the capacity of manure if I cannot utilize it myself.
- Even if MDA establishes the State storage sites, it will be my responsibility to transport the manure to wherever designated. The site maybe many miles from my poultry houses and I would have to hire a truck to transport it.
- If the value of manure is lost due to the decrease in demand alternative uses for manure may cause companies to charge a fee to accept the manure which is more money out of my pocket!
- Who will monitor the manure at the State storage sites and who would monitor what the manure tests results show the levels are in the manure and who decides who can buy it and it is usable on their soil?
- Grain farmers:
 - Denies the ability to use manure on their crops, grain farmers will have to buy commercial fertilizer to replace chicken manure that they have been using.
 - Grain farmers who have used manure and not commercial fertilizers may have to buy or rent equipment to apply the purchased fertilizer and leave the manure spreader in the barn, thus once again raising equipment costs.
 - Grain farmers may have to hire a fertilizer company to apply the fertilizer instead of doing the work themselves and once again another cost out of my pocket.
 - Commercial fertilizers will help grow a crop; however the micronutrients and organic material in manure will help grow a larger crop. If yields are lessened due to the loss of organic material and micronutrients my income will diminish.
 - Grain farmers and poultry farmers alike will most likely have to alter their business plan in ways that will weaken their ability to borrow and withstand adverse growing conditions and/or markets – requiring new expenditures and

- capital purchases such as equipment while at the same time reducing potential yields.
- Grain farmers could also see increased effects of drought on their crops as a result of losing poultry litter's organic material that helps build up soil's moisture retaining capabilities.

Once this regulation goes into effect, as it appears it will be and contrary to the wishes of many in the agricultural community, there will be many negative effects. For individuals like me, a small farming operation, the financial impact is huge and to realize no significant and noticeable improvement in water quality is just sad.

I have soils tests that have been taken on the same fields for over 20 years and the FIV value has not changed during that time. Where in fact did the FIV value of 150 come from? Is it a number someone inputted into a computer and decided that is the number I should pick or has science been completed to show that 150 FIV is the level to limit the soil to for Phosphorus levels? I have not applied manure nor a P based commercial fertilizer, the Phosphorus that is measured in the soil is staying in the soil and is not moving through groundwater or any other way for that matter. Science has proven that whether it is the University of Maryland science or science from the testing labs where I send my soil samples.

The expense that our farming operation will have to incur will be very detrimental to my bottom line; it will cost between approximately \$8.00 a ton to transport my manure if I had my own truck. Since I don't have a truck to transport my manure, to God knows how many miles away to a State approved site, a loaded mile rate fee is \$3.00 per mile on top of the \$8.00/ton. This will cause a huge reduction in my cash flow and then considering I will have to purchase fertilizer in place of my manure will just kill my bottom line.

There are scientists, MDA employees, environmentalists and the Governor who are telling farmers how to farm when they have never farmed a day in their life. How can someone tell me how to grow a crop when they don't know how to grow a crop themselves! I have been farming for over 70 years how dare you tell me how to run my farm business. MDA has to trust the farmers in this State to make good decisions and to do the right thing without regulating them out of business.

There are so many farmers who do not have off the farm jobs and do not have a steady paycheck to fall back on. Insurance costs, machinery, fertilizer, spray, seed, living expenses, fuel and many other items that you have to have on the farm to run an agricultural business have all risen in prices and my profit margin is growing smaller and smaller each year. Yet, once again there is more and more expected of an already depressed occupation. If farming wasn't such a passion and what my family wants to do for a living I would quit and move to the west to get away from the bureaucratic mess! Farmers have agreed to so many new regulations over the past 20 years and yet no acknowledgment of all of what has been asked, or better yet, regulated to us. We have completed Nutrient Management Plans, Soil and Water Conservation Plans, soil tests, manure tests, annual implementation reports, crops reports, cover crops, Maryland Department of Environment inspections, bio security measures, manure reports and so on and so on, enough! There are so many flaws in the TMDL process, the WIP process and so many modulated

numbers that are not science based but created by a computer that has a person entering data that they "THINK" is appropriate. This process of cleaning up the Bay is all an educated guess! In most instances the people who are providing the computer created data have something to gain from pointing the finger at agriculture and to think that MDA has accepted and supported this mess is very disappointing. My family and every farm family wants the health of the Bay to improve but until you have every person, business and municipality, within the Chesapeake Bay watershed to do what should be done to clean up the Bay, regulating farmers will not do the job.

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 commodity, tremendous harm will come to our States largest economic engine, Agriculture and without improving Maryland's environment.

Respectfully


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