

From: [Henry Benthem](#)
To: [Jennings, Jonathan \(ECY\)](#)
Subject: Draft
Date: Friday, October 02, 2015 8:25:18 PM

First of all I'd like to say that the job the NRCS and Dep of Ag have done has been more than adequate on nutrient management , our P and K have been steadily dropping and we are always low on N. With all these proposed changes you will see an exodus of dairies leaving the business. We have spend hundreds of thousands of dollars to be in compliance with nutrient manage plans and now it has been all for not because 'the possibility is there for us to pollute' .

We have been good Stuart's of the land and servants to the environment and the community.

Everybody in life has ' the possibility to pollute' driving a car you could have an oil ,gas ,coolant leak. That doesn't mean that they will and everyone wants to avoid that.

Some of the things that would affect us on our dairy is the sampling of 1.2.3 ft down is crazy if there are no issues with the top foot of soil why would they be one at three ft down . We sample every year already both soil and manure and apply only what each crop needs.

If all these rules go in effect I am afraid our neighbors who are receiving manure now will not want to participate anymore because of all the extra paperwork.

There are also times of the year in which we can spread manure on dormant crops like alfalfa in early spring or late fall when there is no frost or rain with NO possible chance of polluting anything and we also no till on occasion so we would not be incorporating it in the soil.

We are NOT polluting and are NOT putting the environment or people or animals in harms way, by following BMP's and our farm plan. These proposals will create a mountain of paperwork and chaos and misunderstanding between DOE and farmers,

To assume a lined lagoon or a soil lined lagoon is polluting is not based on science, it's based on assumptions and that is why we are here today. You can test lagoons anywhere and you will see there is no seepage or pollution.

Please stop driving vehicles stop using batteries and keep all pets in a concrete room so there will be no chance of it polluting the environment , don't use the toilet cause the municipality can also ' possibly pollute' , there are no guaranties that no one will pollute but the proper guidelines are in place already for us to follow and if we follow those guides there will be no pollution.

I believe these proposals that the EPA is writing up are not nessary and the NRCS and dep of ag have professionals in place who are more than qualified to do what the DOE is trying to take over.

Thanks for your time,
Henry Benthem.