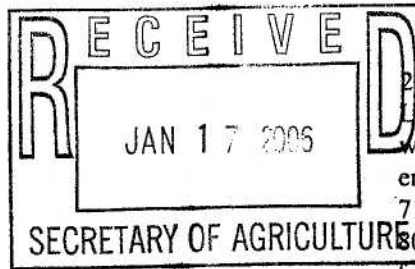




Pennsylvania State Grange



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January 12, 2006

The Honorable Dennis C. Wolff, Secretary
Pennsylvania Department of Agriculture
2301 North Cameron Street
Harrisburg, PA 17110

Dear Secretary Wolff:

On behalf of The Pennsylvania State Grange I am writing to express our concern regarding the Proposed Rulemaking for the final Commercial Manure Hauler and Broker Certification program.

We are very concerned that the Nutrient Management Advisory Board and the State Conservation Commission were not afforded the opportunity for consultation in the drafting of these regulations as Act 49 requires. We request that the Department withdraw the proposed rulemaking and rewrite the regulations, in consultation with the two Boards, in a less restrictive manner while still following the intent of Act 49.

If withdrawal is not possible, we strongly urge a sixty day extension of the comment period to allow time for input from the two Boards as well as participation from the industry. A delay of sixty days at this time would be a more efficient use of time to implement the regulations and avoid a contentious adoption process later. A sixty day extension would allow time for the Department to meet with interested parties and develop a more reasonable program in keeping with the intent of Act 49.

We also strongly recommend that the Voluntary Certification Program developed by Penn State be adopted as the Interim Program. This voluntary program has been well received by the industry and its adoption would avoid confusion and turmoil at this time until the final program regulations are adopted.

Thank you for your consideration in this matter.

Sincerely,

Betsy E. Huber
President

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