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January 13, 2006

Dear Mr. Berger:

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My name is Travis Ayres and I am a custom manure hauler in Bradford and Tioga counties. I started this business nearly four years ago and I have had no environmental issues. I also am a supervisors and chairman for LeRoy Township (Bradford County). As a chairperson, I helped reinstate LeRoy as an ag. secure area. Prior to becoming an entrepreneur in this field, I was a dairy farmer with my father's farm my entire life. We participated in soil conservation plans and I feel my comments and opinions should be valuable in manure handling regulations.

I am concerned with the proposed regulations and the onset of hardships that it brings to manure haulers, farmers, and land owners. Small agricultural businesses already have difficulties competing in rural Pennsylvania. Issues such as insurance, benefits, competitive wages, and in my business, seasonal work add to these difficulties. Now with the proposed regulations manure haulers could possibly be a "thing of the past". My small custom manure hauling business is in jeopardy.

The reason for my letter is to comment on, and give my input on, the proposed regulations for manure haulers. Please consider the following:

- The proposed program needs to be similar to the Penn State program. After certification for manure hauling is achieved, it should be maintained by annual training and not have an expiration date.
- The cost for the proposed regulations is excessive. Is this to cover the salary of a state worker in Harrisburg?
- The display of certification numbers is not practical. Having multiple pieces of equipment and employees makes it necessary for us to be versatile (we don't use the SAME piece of equipment on a day to day basis). Certification numbers will also draw unnecessary attention from the non-dairy public.
- Manure from non-CAO/CAFO operations should be exempt from manure hauler regulations.
- With your proposed regulations, the record keeping is excessive. There is no need for the Pennsylvania Department of Agriculture to have the records of manure haulers. These records should remain on the farm and be available as needed for inspection. In many ways, this is a double regulation since CAO/CAFOs are required to keep these kinds of records now.
- The limitation of stacked manure to fifteen days isn't feasible since our wet season is considerably longer in the northern counties.

Please reconsider your proposed regulations on the handling of manure. I believe your proposed regulations are jeopardizing many agricultural businesses.

Thank you for your time in this matter.

Sincerely,
Travis L. Ayres
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