



RECEIVED

October 10, 2007

2634

2007 OCT 23 AM 11:47

INDEPENDENT REGULATORY
REVIEW COMMISSION

State Conservation Commission
Agriculture Building, Room 405
2301 North Cameron Street
Harrisburg, PA 17110

RE: Proposed Rulemaking, State Conservation Commission
Facility Odor Management Regulations

To Whom It May Concern:

As members of the agriculture community, who may be subject to these new odor regulations, I personally believe it is reasonable to ask that new operations that are significantly going to contribute to the odor issue be required to implement best management practices that will reduce the amount of odor possibly escaping off the premises of the operation. With the encroachment issues the agriculture community faces, it is imperative that we do what we can without putting more unreasonable responsibility and strain on the farmer. I believe these proposed best management practices are a good way to help the odor issue, but they need to be realistic for the farmer who has to implement and maintain the odor management plan.

The commission has taken much into consideration and has spent adequate time preparing these regulations. However, the funding opportunities that are being proposed could possibly be spent before many farmers receive the help they need to get their odor management plan written and implemented. One of the biggest concerns I see is how much it will cost the farmer from the beginning, getting the plans written, to the end, being implemented in the three years they have to get the entire plan installed properly. I believe it can be done, but a greater incentive has to be present.

Another concern I have is how will this affect current operations that aren't new or recently improved in the future? This regulation addresses the newly developed operations, but what about all the other operations that become subject to a new housing development or multiple new neighbors? In addition, how will new technologies be accepted and incorporated into the regulations? The new technologies must be affordable for the farmer.

Because the Odor Management regulations coincide with the current Nutrient Management regulations, they can easily be completed together and help each other respectively for planning requirements. Overall, I believe these regulations will aid in helping address air quality issues from an odor standpoint.

Thank you for your time.

Sincerely,

A handwritten signature in cursive script that reads "Rebecca Ranck".

Rebecca Ranck
Environmental Coordinator