



# York County Conservation District

"Conservation • Stewardship • Education"

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YCCD staff comments on proposed Facility Odor Management Regulations:

1. Legislation gives Districts lots of opportunity to accept responsibility for OM delegation but apparently offers no funding. 83.731 (b): "delegation of administrative or enforcement authority may be made to a conservation district when the district demonstrates it has or will have an adequate program and sufficient resources to accept and implement the delegation".
2. We would like to see more information on the specific BMPs that will be required: What are they? What will need to be done?
3. What will be the general public's reaction when they realize the legislation does not address field application of manure?
4. 83.701 Definitions define livestock, but not poultry.
5. 83.703 (i), (ii) & (iii) Who determines what is "practical and economically feasible"?
6. 83.761 (2)(iii) Need to define "surrounding area" How big? What are the land use categories?
7. 83.762 (5) Biosecurity protocols should be a part of the written plan and not need to be requested.
8. 83.771 (b) (i&ii) The plan "need only address adjoining landowners" when being developed. Need to also consider other nearby neighbors?
9. 83.782 (b) What will be used to determine criteria for planting practices – i.e. planting patterns, plant heights, etc. Will the criteria and plan have to be updated at some point?

INDEPENDENT REGULATORY  
PERMISSIONS

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