

August 16, 2010
John Huisman
DENR/Division of Water Quality
Planning Section
1617 Mail Service Center
Raleigh, NC 27699-1617

Dear Mr. Huisman:

The Durham County Farm Bureau Board of Directors would like to submit the following comments on the proposed Falls Lake regulations.

As President of the Durham County Farm Bureau, I attended some of the stakeholder meetings, and was surprised to see the amount of nutrients the DWQ model said agriculture was delivering to Falls Lake. Based on a study by Dr. Deanna Osmond at NCSU, agriculture is not nearly the source of nutrients that was predicted in the Falls Lake model developed by DWQ. Is it necessary to impose additional regulations on farmers in the Falls Lake watershed that exceed the current Neuse agriculture rule?

If agriculture's nutrient contributions, as shown by the DWQ model, are what triggered a perception that this Falls Lake agriculture rule was needed, then the hearing officers need to reexamine this and consider whether this Falls Lake agriculture rule is needed. We are already exceeding the Neuse agriculture rule requirements, but these very high reductions are unrealistic for farmers to meet and continue to farm.

We work hard here on our farms to protect water quality, and have exceeded the nutrient reduction goal for agriculture in the Neuse Basin. Farmers in our county and throughout the watershed are hard-pressed to stay in agriculture in this rapidly developing area.

We ask that you consider that agriculture is a beneficial land use to the environment and to the community, and not adopt additional rules that may not be necessary. However, if rules are adopted on agriculture in the Falls Lake watershed:

-We support the collective compliance approach to rule implementation, such as is currently used for the Neuse Basin regulations.

-We oppose the mandatory requirements for every farmer to install buffers, livestock fencing, and other mandatory BMPs on all farmland in the Falls Lake watershed. This is currently proposed for Stage 2. This should not be in the rules at all, either in Stage 1 or Stage 2. Successful and environmentally sound farm management practice decisions are best made on the farm with technical assistance from local agricultural agencies, not by one size-fits-all state rules.

We appreciate the opportunity to comment on these proposed rules.

Sincerely,
Talmage Layton, President
Durham County Farm Bureau
6504 Cheek Road, Durham, NC 27704