

Hi All,

I am not in favor of adding any additional sections to the RAPs on soil health or soil quality. There are already required practices incorporated within nutrient management planning standard that promote soil quality. I don't see the value to adding more language and more specifics that in some ways may limit a farmer's ability to actually improve soil quality. Manure application is identified as a way to improve soil health as well as crop rotation and reducing tillage. These are all practices highlighted and incorporated into nutrient management plans.

There is a fear that the language is not strong enough around soil quality - I would disagree - the NMP standards strongly support soil quality. I feel this way because I help write 60 NMPs a year and I see what farmers are implementing to improve soil health.

article C (line 8) - I am not sure why this is in this section - is this insinuating that we are headed down a pathway that farms will each have their own load allocation that they need to meet? Is this saying that the Agency must develop methods to come up with individual load allocations per farm?

Last section Lake Carmi Pilot Project - also felt shocked by this section. I am not sure how or why we would take an approach just eliminating P imports without looking at mass nutrient balances to understand P flows. It also doesn't at all look at what practices the farms in this watershed are implementing or the nutrient budgets on these farms. This "pilot project" is not realistic and will not get to the root of the problems in Lake Carmi. It also shows a complete lack of understanding of what is happening on farms. It is disappointing to say the least.

You would need to put a moratorium on farming if you are planning to put a moratorium on not importing grain (this is one of the aspects of the moratorium). This would also have severe implications on farm financials and I have a feeling the financial institutions would take serious issue with blocking grain moving onto these farms. This needs serious consideration and thought before something like this is actually implemented. I am happy to comment more but I am seriously opposed to this type of pilot project.

Thanks Heather

