

**Enhance Reporting of BMP Implementation**

Voluntary reporting of our ongoing efforts is the most efficient and effective way to work toward the goals stated in the WIP.



**Extending the Chesapeake Bay Preservation Act West of I-95**

A mandate is a large expansion of regulatory authority over land use by localities.



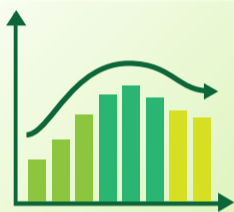
**Bioreactors**

Research on bioreactors is ongoing, and while we are encouraged by it, we have yet to see definitive results of this research here in the Commonwealth, especially in different topographies and soil compositions.



**Improve Soil Health**

The term "soil health" is too ambiguous and is difficult to quantify and monitor. This could lead to producer confusion and hinder uniformity in enforcement mechanisms.



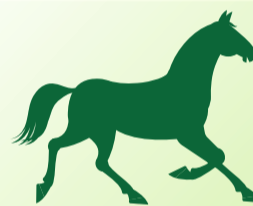
**Increase NMP's on Agricultural Land**

The Council opposes outright unfunded mandates on members' business practices. We also oppose a sole member of the Administration having unilateral authority to mandate practices and set benchmarks on an annual basis without oversight.



**Livestock Stream Exclusion**

Mandating stream exclusion would erode the trust and positive working relationship the industry has fostered over the years, and is impractical for many leased-land farmers. Pursuing mandates ahead of the 2025 deadline is premature, and industries like dairy cannot be expected to risk thousands of dollars while their farm economy continues to struggle.



**Horse Management Incentives**

Carrying capacity of equine livestock depends on several factors, and our membership holds concerns about the pilot program. We have argued for starting a pilot project with as few restrictions as possible for the equine industry in an effort to put as many BMP's in place as possible.



**Local Government Authority to Set Land Area Requirements for Horses**

We have a long standing policy opposing patchwork regulatory framework at the local level. This recommendation would allow localities to broadly regulate horse owners and operators through zoning, whereas we favor an incentive-based approach.



**Expand Poultry Litter Transport**

Any overly-burdensome mandatory reporting requirements would likely cause end-users to seek other forms of fertilizer for their land, undermining the effectiveness of DCR's Poultry Litter Transport Program. A voluntary tracking program would allow the Commonwealth to receive credit in the Model without overly burdensome regulation.



**Prioritizing Native Plant Nurseries in the Agriculture and Forestry Industries Development Fund (AFID)**

The AFID program was created to sustain economic innovation in the industry, and it should not have any conservation criteria. This funding should go where it will do the most good – to benefit the health of rural communities.



**Audit & Verify Contractor-Applicator Reports of Fertilizer on Urban Land, Limit Bag Size**

Limiting fertilizer bag size does little to minimize the amount of fertilizer applied – users will simply buy more bags to make up the difference. Likewise, while we have supported the contractor-applicator program when originally established



**Limit Bag Size**

This will require a significant increase in resources for VDACS and we recommend VDACS be given the staffing to target underserved areas while also maintaining the standards of the program previously administered and supported by our members.