

Farm Bureau objects to EPA process, not Chesapeake cleanup

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In your January 14 editorial "**Faulty stewardship**," you took great aim at the agricultural community and the Farm Bureau for its recent lawsuit against the **Environmental Protection Agency**. We would like to set you straight on some facts so that your readers are completely educated about this recent action.

This lawsuit is not seeking to delay clean-up of the **Chesapeake** Bay. Farmers are committed to doing their part to achieve the goal of clean water for the Chesapeake Bay. The **U.S. Department of Agriculture's** Natural Resource Conservation Service found that farmers were actively implementing erosion control practices on about 96 percent of the cropland acres in the watershed and found that sediment contributions to the region's rivers and streams are being reduced by 64 percent, nitrogen by 36 percent, and phosphorus by 43 percent.

This lawsuit challenges a specific, unlawful EPA regulatory action. It is about federal overreaching into state authorities across seven jurisdictions. EPA claims to be working in "partnership" with the states, but its tactics throughout this process have looked more like coercion than cooperative federalism. Rather than facilitate and strengthen the cooperative bay restoration process that has recently made such great strides, EPA chose a top-down approach.

This lawsuit does not seek to benefit agriculture at the expense of others. Farmers do not want to shirk their responsibilities or shift clean-up burdens onto other sectors. No one knows the full cost and economic burden that the EPA will impose because EPA has refused to conduct an analysis of those impacts. States within the watershed have estimated that implementation will cost billions of dollars.

It is not that the regulations are unlawful because implementation would be costly. But the cost of EPA's action is so great, EPA is both morally and legally obligated to apply sound science and to allow for full and meaningful public participation in its decision-making process.

EPA also made an arbitrary decision to finalize the regulations without correcting gross errors that undermine their scientific validity. Incorrect assumptions and estimates were fed into flawed models ill suited to the task for which they were being used. EPA's models were not designed for the job of allocating pollutant loads at this level of detail. They were not properly calibrated or validated. EPA admitted that its modeling was flawed but nonetheless finalized the regulations without correcting these deficiencies.

Maryland farmers have spent many years establishing and abiding by stringent nutrient management plans to be better stewards of the land. It is in their best interest to do so. Maybe you should visit some of those farms so you can better understand their environmentally sound farming practices.

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