



Taryn LaScola, Director,  
Director, Division of Crop and Pest Services  
Department of Agricultural Resources  
251 Causeway Street, Suite 500  
Boston, MA 02114

October 26, 2016

RE: Regulations at **330 CMR 31.00**: PLANT NUTRIENT APPLICATION REQUIREMENTS FOR AGRICULTURAL LAND NON-AGRICULTURAL LAND, NON-AGRICULTURAL TURF, AND LAWNS PURPOSES

Dear Director LaScola:

Thank you for the opportunity to comment on this important regulatory change. The Wastewater Advisory Committee (WAC) commends the Massachusetts Department of Agricultural Resources (MDAR) for its efforts to protect the quality of the Commonwealth's freshwater resources.

WAC understands and supports the effort to prevent freshwater algae blooms caused by excess Phosphorus. The Phosphorus in MWRA's fertilizer pellets has been combined with ferric chloride, which makes the Phosphorus mostly insoluble in water. We ask that MDAR's refine its new regulations to **differentiate between the easily-soluble Phosphorus in chemical fertilizers from the slow-release Phosphorus in MWRA biosolids**. Not only would this allow for the use of biosolids within Massachusetts' borders (which translates into considerable freight emissions savings), but it would also assist the DEP's efforts to increase recycling, rather than landfilling, organic waste in the Commonwealth

As you know, DEP has banned organics from landfills for larger generators, a move WAC supports, and which we hope will mean more recycling of organics through co-digestion. MDAR's draft regulation appears to make such recycling more difficult. WAC asks that you clarify this issue in your next draft.

If you have any questions, please feel free to contact our executive director, Andreae Downs, at 617-378-8972 or [andreae.wac@gmail.com](mailto:andreae.wac@gmail.com).

Sincerely,

Taber Keally

Chairman, Wastewater Advisory Committee to the MWRA

*WAC is a citizens' advisory committee to the MWRA on wastewater issues. We provide an independent forum for discussion of these matters. Environmental improvement, safety, cost and technical issues are all considered when formulating our recommendations.*