



Champlain Valley Farmer Coalition, Inc.

*Farmers working together for a clean Lake Champlain
and thriving agriculture in Vermont.*

Secretary Chuck Ross
Vermont Agency of Agriculture, Food & Markets
116 State Street
Montpelier, VT 05620-2901

AUG 20 AM 9:01

August 14, 2014

Secretary Ross,

On behalf of Champlain Valley Farmer Coalition Inc. (CVFC), I would like to submit this official response to the Conservation Law Foundation's petition to require additional BMPs on farm fields identified as 'Critical Source Areas' in the Missisquoi Bay watershed.

CVFC, as you may know, is supportive of the Critical Source Area model as a tool for farmers to identify fields with potential resource concerns, prioritize resources, make management decisions and track progress as BMPs are implemented. In fact, we hope that it can be expanded to be utilized throughout the Champlain Valley watershed. We do not, however, believe it should be used as a regulatory tool to require specific actions for farmers. Stone Environmental explained this sufficiently during the public hearing on July 18th, so I will not expand on it here.

As a group of Vermont farmers dedicated to being proactive about protecting water quality, we recognize that we all need to take responsibility and make management decisions every day that will help us make progress on achieving a healthy lake and a healthy agricultural sector in our state. We support VAAFMs water quality initiatives and have actively participated in the Agricultural Working Group, public hearings during the TMDL process, and interacting with legislators and policy makers during the crafting of HB 586 during the last legislative session.

While we recognize that there are farms of all shapes and sizes in Vermont working diligently to ensure they are farming in a way that is compatible with water quality; we also realize that we have a long way to go. Not everyone has embraced our goal of being proactive in how they operate and manage their farms and land and water resources. We are supportive of VAAFMs ongoing interest and effort in updating and enforcing the existing Accepted Agricultural Practice laws and meeting the requirements set forth by EPA to have a sound TMDL plan, and feel like this is the best place to focus the state's limited resources at this time. We hope to aid in that effort by educating farmers about the AAPs, their value to water quality, and that they do not have to hinder a farming operation, but can be a win-win for the farm and the lake. We also hope to educate farmers about further practices they can adopt on their farms to 'take it to the next level'. Many of our

members and directors have adopted agronomic best practices like nutrient management, cover cropping, reduced tillage, conservation crop rotation, manure injection (with and without dragline) and feel strongly that these practices are improving water quality, soil health, and our crop production capabilities. We don't feel, however, that prescribing a set suite of practices based on a model is the best way to deploy these practices. Farmers must select the right 'tools' for their individual fields and situations. We support the work of VAAFM, UVM Extension, NRCS and Conservation Districts as they are stepping up to the plate to help farmers with one-on-one technical assistance and financial assistance to make decisions like these. We only wish there was more of this type of assistance available, in addition to the resources needed to truly enforce our existing AAP requirements in Vermont.

As an organization, we do not support CLF's petition. While we commend their dedication to being a catalyst for action in protecting the lake, we feel this particular request does not serve the state, the lake or Vermont farmers in a productive manner.

Please feel free to contact me or the CVFC directly if you have any questions about these comments.

Sincerely,

A handwritten signature in black ink that reads "Eric Clifford". The signature is written in a cursive, slightly slanted style.

Eric Clifford,
President, Champlain Valley Farmers Coalition