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Please accept this document as written comment on the Conservation Law Foundation petition to require Mandatory Pollution Control.

Working as a Certified Crop Adviser in the Missisquoi Bay watershed with 25 Dairy Producer Clients for the last 20 plus years has given the opportunity to see much evolution in the water quality arena.

Part of the Certified Crop Adviser program provides us the option of working as a Technical Service Provider (TSP), which allows us in the private sector to write Comprehensive Nutrient Management Plans (CNMP) meeting State of Vermont and Natural Resource Conservation Service (NRCS) 519 standards. In spending many hours writing the plans to meet standards that will reduce environmental impacts on water quality, it is very discouraging to see them tossed on a shelf not to be looked at until we return to do the required, State cost share, annual update.

We as TSPs could help immensely in the daunting task of enforcing these plans and the required BMP's that the CLF is looking for. This could be done by following up after a visit from an enforcement person from the State of Vermont.

Enforcement personnel need to have a title relating to the fact that they are an environmental inspector, much like the current Dairy Inspectors that visit each Dairy Farm every six months for a routine inspection. If the Dairy Inspectors were briefed on what to look for they could make the environmental inspection part of their Dairy inspection. If a major problem were found with the environmental piece the Dairy Inspector could refer that problem to the environmental inspector. This would implement the environmental enforcement in a much more efficient way by reducing travel and people hours.

In making many farm visits to clients it is a resounding comment that all farms need to be treated the same in the inspection process. If one farm is cited on violations and the neighbor has not been visited due to time constraints of the inspectors this makes for a lot of animosity among our dairy producers. In talking with the current staff making farm visits regarding environmental regulations it is always stated that we do not have enough staff to do this job properly. It is difficult enough to find personnel to do enforcement and when being short staffed and not keeping up with enforcement visits makes the job even more difficult.

A hard look needs to be taken at what the Ag Agency Staff is doing and redirecting some of these job descriptions to more vital operations such as enforcement. We as TSP's can make visits on the "how", leaving the staff more time for the "do this" piece. The Agency is headed in the right direction with diverting the program funding duties to NRCS and UVM Extension, using more of their time for reviewing CNMP's and enforcing them. This gives TSP's, who are writing many of these plans, more support in the field and reduces the environmental impact on water quality keeping the CLF tycoons at bay.

The Agency of Agriculture should not get hung up on doing the education piece. UVM Extension in the Northwest Region has an army of people doing education in environmental practices and this will allow the Agency personnel more time for the enforcement, as they are the only agency in all this that can do this task.

The Dairy and Agricultural Industry needs to take all this activity to heart. If we do not, it will sink our industry to one that has no community support to operate. This has been shown in other parts of the country such as California, where many dairy producers have pulled up stakes and moved to other regions or gone out of business solely because of public pressure.

The regulations which will clear up this water quality problem are all in place. Compliance is not out of reach for our states vitally important Dairy Producers. Funds for environmental practices need to be part of the program, however, should not sit on the total responsibility of the State and Federal government. We have many clients that are taking part in the Ben and Jerry's Caring dairy program which pays to help Dairy Farmers comply with water quality standards. Commonwealth Dairy is another example of the Dairy processors stepping up to the plate with their recent grant awards to our Dairy Producers. State and federal funds could be directed to the enforcement piece with Dairy Producers seeking more funds from the Dairy market place, which is beginning to require environmental compliance before they purchase our Dairy Products.