

TMDL Comment from Nate Woodard:

I feel I could write a small book on the subject but will focus on a narrow Ag focused point. I think some of the proposed AAP law changes are needed but some of them go too far considering the current state of programs and progress.

I think the folks proposing these changes can't properly manage the current AAP's and there associated programs; therefore adding more regulations to the mix doesn't make a lot of sense to me. I believe the TMDL drafters need to rework the current system for getting farmers to comply with the current AAP's.

Examples: hold current VAAFMM regulatory staff feet to the fire and make sure they are doing their jobs and not turning a blind eye. Hire more technical staff/project managers that work to get farms into compliance in a non-regulatory way (ideally through non-government, non-regulatory, voluntary conservation with VT Conservation Districts-VACD). Have the regulators refer farms to technical staff. Increase technical staff pay and benefits so that they can maintain a sustainable living to prevent turnover. Long-term technical staff can build better relations with the farming community. Also make sure all components of a technical staff program exist (example: local available engineers to assist, design, and inspect projects). Make sure tax payer dollars are being used wisely through project performance monitoring. Hold big oil and coal companies accountable for current day climate change that is and will continue to negatively impact Ag and implemented Ag conservation practices in Vermont.

I fear some of these new proposed AAP law changes will put a lot of small dairy farms out of business. A lot of these farmers are at or past retirement age and don't have a way to retire. They plan to work until they drop dead. If the AAP's put them out of business how will they survive? Also I feel a lot of Vermont's tourism is a result of the high farm numbers. The agricultural community in Vermont is what makes Vermont the great State that it is!

Perhaps an alternative program to get farmers into different styles of farming would be beneficial (dairy to beef, dairy to veg). MFO's and LFO's have money for expensive NRCS/VAAFMM supported projects but small dairy farmers who are just getting by can't afford even the best cost share programs not to mention the external equipment to manage the new practices. More cooperative agricultural community efforts might be one solution.

I feel Vermont still has a very long way to go to improve water quality! I think it's important to look at current programs and processes and make the needed upgrades and changes before making things more complicated.

For the Earth: Farmers, Water Quality and General Ecosystem Conservation!

I am always available for questions or consultation.

Sincerely,

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