

January 30, 2018

House Committee on Agriculture and Forestry,

Hello, my name is Stephanie Walsh and I work for NOFA-VT, Vermont Organic Farmers, as an organic Certification Specialist specializing in dairy and livestock. I also have seven years of commercial dairy farming experience; three of those years were spent on my own small dairy farm in Franklin County. I have a Bachelor's of Science degree in Environmental Science from UVM and a Master's Degree in Environmental Law from Vermont Law School.

I was asked by the committee to provide testimony on H.678. With experience gained while serving on the RAP development committee with the Agency of Agriculture and talking with my constituents, I strongly support H.678. This bill addresses the problem of insufficient data available to the Agency when drafting proposed rules to add to the RAPs to address Subsurface Tile Drainage in Vermont. Although I can not speak to the specifics of the study, UVM Extension has received funding and just recently started sampling in an effort to understand the impact of subsurface tile drainage in Vermont. The data available to regulators at this point mostly comes from the mid-west, where soil types, topography and climate vary drastically from those of Vermont. Also, management techniques on farms where data is available from differs vastly from the management on Vermont farms.

Because of the unknowns, it is of my opinion that the agency should be granted more time to complete and analyze the data from the studies being conducted on subsurface tile drainage in Vermont before beginning the rulemaking process. Dairy farmers in Vermont are currently facing multiple challenges including decreased pay price on their milk, increased regulations and a changing climate, to name a few. We need to be able to understand the impact of these proposed regulations on the management on Vermont farms so we fully understand that the management changes requested from Vermont dairy farmers will have a positive impact on our Vermont waters.

My constituents are organic commercial dairy farmers in Vermont. Subsurface tile drainage systems are used on both organic and conventional dairy farms in Vermont. Although there is little data on how much subsurface tile drainage is in VT, anecdotally I know that organic dairy farmers have used subsurface tile drainage to improve drainage on pasture and hay lands as well as on annual crop land, like corn. Subsurface tile drainage is used as a tool by all types of dairy farmers to increase productivity on all types of crop and pasture land without necessarily having a negative impact on Vermont waters. However, this anecdotal knowledge needs to be backed by hard scientific data, thus the need for more time to study and analyze the data from Vermont specific studies that are just in their infancy.

Again, please support the passage of H.678 to allow more time for Vermont specific scientific research to inform the changes to the RAP regulations. Please feel free to ask me any questions.