

Dear Chairman Deen,

Thank you for your interest in S.260. I hope the Natural Resources Fish and Wildlife Committee can consider the following:

**Projects eligible for funding:**

- Include projects for priority funding if they also help the state meet its Hazard Mitigation Plan (HMP) goals. You may be aware this Plan is revised every five years, and is currently in that process. Plan recommendations include soil based practices. Contact Stephanie Smith [Stephanie.A.Smith@vermont.gov](mailto:Stephanie.A.Smith@vermont.gov) if you would like someone to testify on the benefits of soil based mitigation and climate resilience practices as part of Hazard Mitigation.

- Add on-farm monitoring as eligible for funding. Monitoring is essential to measure the benefits of change of practice, whether the use of compost or changes to cropping and grazing practices.

- Delete **community-based methane digesters that utilize manure, wastewater, and food residuals to produce energy** from the list of innovative or alternative technologies or practices designed to improve water quality or reduce sources of pollution to surface waters. (See below for information on digester technology)

- If funding for biosolids digesters remains in the bill, include a definition of 'community-based' to ensure this is not a handout for developers and utilities at the expense of electric ratepayers, and taxpayers; specify that the Renewable Energy Credits (RECs) from projects funded for water quality improvement must be retired.

- Add the following to the list of funding eligible projects and technologies

- heat recovery from composting on farms\*
  - dairy farm transition to grass-fed (assumes most water quality issues on farms are related to growing corn)
  - composting at regional and local scale (also supports demand for compost to meet new rules in the Vermont Stormwater Management Manual).

\*Compost alters nutrient availability in the soil, and provides water quality benefits, along with increased carbon sequestration and profitability from: improved soil health from additional organic matter (compost) that builds soil structure and reduces erosion, helping farmers achieve RAP goals; reduces the need for commercial fertilizer; produces plants more resistant to disease and weather extremes. There is growing interest from farmers, especially for composting systems designed to also capture heat (compost heat recovery <http://agrilabtech.com>). Helping farmers make this transition is good for water quality, and agriculture.

**About digesters:**

A digester does not alter nutrients. What goes in, comes out - unless the digestate is subject to further treatment such as precipitating out phosphorous. My understanding is a digester that mixes municipal wastewater with food scraps and manure results in digestate that must be treated as bio-solids, and a market found for the material. Given these additional and not insignificant costs, is there enough public good to justify public funding for this approach to nutrient management? What is the market for this material? Will Vermont farmers and gardeners want it? For more information about biosolids management contact Ernie Kelley in DEC Waste Management Division: [ernie.kelley@vermont.gov](mailto:ernie.kelley@vermont.gov)

Thank you for considering these concerns and recommended changes to S.260.

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