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Dear Members of the House Committee on Agriculture & Forestry:

My name is Eliza Perreault and I own/operate Cloud's Path Farm in Sheffield, VT. I am writing in support of Section 19 of S.160.

Cloud's Path Farm is a sixty-five acre rolling wooded parcel near the top of the heights in Sheffield, VT. We have been incorporating chickens into the composting process for 16 years to create an end product that benefits our farm fields. We have a year-round practice that rotates the composting process to different areas of our farm lands. In the summer, the chickens are on a twenty- acre agricultural area. Using poultry netting, we move the chickens' pasture over the desired areas in need of nutrient enrichment. That means they are moved over the vegetable gardens and open pasture in turn where they have the option of eating weed seeds, bugs, and our composted materials. As we move the chicken pastures over the agricultural area throughout the summer and fall we build small manageable compost piles that are strategically located near the gardens for use in the next seasons vegetable garden. The compost that is on pasture only is spread, when ready, out over the land to rebuild the soil for future garden space. In the late fall the chickens are moved closer to our house where they reside in a greenhouse with deep bedding and access to the winter compost pile. In late spring the process repeats and the chickens will be moved in chicken tractors to the summer pasture. The compost residuals are captured by the forest surrounding the farm, the open grass areas, and the shrubs around the compost area.

The ANR has given haulers and composters an ultimatum. Either comply with becoming a solid waste facility or stop accepting food residuals. Either option will create a difficult situation for local farm businesses and their customers throughout the state. The addition of composting and hauling is reinvigorating the small farm, local communities, and rebuilding the health of the soil all at a small town, local level. If local farmers decide to continue to haul and accept food residual's they may need to spend a significant amount of capital to build solid waste holding areas for a material, currently managed responsibly, ultimately increasing economic harm to small rural farms. On-farm chicken forage composters are incorporating unique methods that benefit the environment, provide a service to communities, and are rebuilding the soil.

If we were to follow the recommendations of ANR we would need to designate a specific area as a solid waste facility which would remove the chickens' access to fresh pasture and the choice they have to forage for what each chicken needs to create healthy eggs. The economic impact to our small farm and our customers in the costs needed to implement ANR's regulations in the timeframe they have set forth is high and not practical. ANR has proposed an extremely short time period to implement multi-year projects for on- farm composting projects that should be allowed to grow as on-farm composting

operations grow and provide fluidity (in a written format approved by the stakeholders) for innovation. ANR's requirements have given the on-farm chicken forage composter community a little over two months to make a decision that will affect the economic viability of a rural small farm in an economically deprived location in the Northeast Kingdom of Vermont where few quality jobs are available. The requirements for the permitting of *approved* projects, certification for solid waste facilities and the finished improvements to be completed in little over a year (if you include winter and mud season farms have less than 5 months, on top of normal farm activities to come into "compliance") is unreasonable. It will significantly impact already planned capital projects that we have worked to implement over the last five years. The timeline directly impacts our farm through redirecting of funds for everyday farm needs (seeds, energy, feed, marketing, grow spaces, etc.) and redirects a significant amount of capital resources to funding unnecessary improvements to regulate a historically accepted environmentally friendly practice. The designation of on-farm chicken forager farms as solid waste facilities may directly impact the sales of operations that sell a lot of compost.

The regulations that ANR decided on did not take any of the stakeholders' concerns about the NEW process of composting as it was incorporated into the Universal Recycling Law. The agency is trying to insert a square peg into a round hole, without understanding the implications of the impacts to the local, rural farm economy. It is very important that compost processes be seen as a benefit to the environment and new regulations that consider the farming practice of feeding food residuals to chickens as part of a composting process is a farm operation and NOT a solid-waste facility. Composting on-chicken farms is a valuable resource to save and increase local farms' revenue, the soil, improve water quality, and provide quality jobs in poor communities.