

Dear Members of the Vermont Legislature,

The FWA is writing to express their support for the ongoing efforts of the Vermont Agency of Agriculture, Food and Markets (VAAFM) in managing agricultural regulations and to raise several concerns regarding the recent developments in regulatory oversight:

1. Commendation for VAAFM's Enforcement of Required Agricultural Practices (RAPs):

- VAAFM has shown commendable dedication to enforcing the Required Agricultural Practices (RAPs), critical for maintaining our state's water quality. We acknowledge the agency's proactive approach to ensuring compliance through inspections, education, and enforcement actions, and we encourage continued stringent enforcement in partnership with our farming community.

2. Support for the Routine Use of Corrective Action Letters:

- The use of Corrective Action Letters (CALs) by VAAFM has been instrumental in fostering a supportive rather than punitive regulatory environment. This approach not only educates farmers on compliance but also provides them with an opportunity to rectify issues. We support the continued and enhanced use of CALs as part of VAAFM's enforcement strategy.

3. The Absolute Importance of Stopping Direct Discharges from Farms:

- We cannot overstate the importance of stopping direct discharges from farms into our waterways. VAAFM has been diligent in addressing this issue, implementing measures to prevent runoff and pollution. Their commitment to this aspect of agricultural regulation is vital for the health of Vermont's rivers, lakes, and streams, and we commend their proactive stance.

4. ANR's Role in Agricultural Regulation:

- While we understand the EPA's directive for ANR to take over certain aspects of agricultural regulation, we must ensure that this transition does not undermine the effective work already being done by VAAFM. How will ANR leverage VAAFM's experience and expertise to ensure a seamless transition and effective enforcement?

5. Clarification on EPA's Critique:

- The EPA's involvement suggests there are issues within the regulatory system rather than with the farming community's adherence to RAPs. We seek detailed insights into how the

EPA has identified these issues and how they plan to work with VAAFM to address them without casting undue blame on Vermont's farmers.

6. Protecting the Farming Community:

- It's imperative that our farmers are not seen as victims of any regulatory inefficiencies. We ask for your commitment to ensuring that any changes in oversight do not disrupt the agricultural sector, which is vital to Vermont's economy and identity. How will the legislature support VAAFM in continuing its role while navigating this new regulatory framework?

7. EPA's Role and ANR's New Responsibilities:

- Given VAAFM's current role in enforcing parts of the Clean Water Act, we need clarity on why a shift to ANR is necessary and how this will improve outcomes for our environment. We support a cooperative approach where VAAFM's knowledge and relationship with the farming community are not lost.

8. Ensuring a Positive Future for Vermont's Farmers:

- As we move forward, what assurances can be provided to farmers that this regulatory shift will be beneficial, transparent, and considerate of their operational needs? We advocate for a collaborative effort that enhances compliance while supporting the sustainability and growth of Vermont's agricultural sector.

We appreciate VAAFM's efforts and look forward to a regulatory environment that supports both our farmers and our environmental stewardship.

Thank you for your attention to these significant issues.

Sincerely,

The FWA board