

April 9, 2020

Lindsay Kurrle, Secretary
Agency of Commerce and Community Development
National Life Bldg David Building, 6th Floor
One National Life Drive
Montpelier, VT 05620-0501



Dear Secretary Kurrle,

On behalf of the Mulch & Soil Council (MSC), which is the national non-profit trade association for all producers of horticultural mulches, consumer potting soils and commercial growing media, representing over 100 member companies, we are writing to request that, following ACCD's March 31 memo to large in-person retail operators, garden products be reclassified as essential products, going forward. This includes, but is not limited to, products used for greenhouse and home vegetable production such as: potting soils, raised bed soils, landscape soils, organic and chemical fertilizers, soil amendments, mulch, crop seeds, vegetable plant plugs, vegetable starter plants and any related garden products to support food crop production.

Historical Context:

As we've seen throughout our country's history, starting with Victory Gardens during World War II and more recently following the 9/11 terrorist attacks, certain garden products fulfill an essential role in expanding and protecting our critical food supply. Over 76% of households in the U.S. have a yard or garden, which accounts for over 87.4 million households. Before 9/11, vegetable gardening was estimated at 7-9% of U.S. households. Following 9/11, due to widespread fears of food shortages and food safety concerns, by 2004 the number of vegetable gardens rose to 68% of households with a yard or garden. In Vermont, that number is at least 134,155 households, or 51% of all Vermont households. We are already seeing a similar surging demand for these types of products, essential for gardening, throughout the U.S., as a response to the COVID-19 outbreak.

Additionally, the 2012 Agcensus of the USDA, determined greenhouse production of fruits, berries, tomatoes, other vegetables, which requires the same growing media, fertilizers and soil amendments, accounts for over \$660 million in value to U.S. food supply. Adding mushroom production and vegetable seedlings and plugs expands the food related greenhouse market production value to over \$2 billion.

Public Health and Well-Being:

During this national emergency, Stay-At-Home Orders are causing tremendous family tension and stress. Children are home with limited activity options (causing stress), which makes parents trying to work from home even more stressed. Adults are worried about affording rent **and food**. Gardening is known to be a stress reducer. It can provide adults and children with outdoor activities and fresh air that build mind and body and will certainly help put food on the table from spring through fall.

Agriculture and Food Production:

As we've already seen, grocery stores are struggling to keep up with demand, and supply chain issues have resulted in food shortages in many areas of the country. No one knows how, or how soon, these issues will be resolved. As a result, consumers are experiencing very significant food insecurity. Many have already turned to self-sufficiency through increased home food production.

Due to short growing seasons in many parts of the country, including Vermont, typical consumer demand utilizes 50% of industry production of these types of products during the 13 weeks from March 1 to May 31. Vermont's growing season is short, with only 118 days, and the last freeze often coming in mid-May. Cool season crops need to be planted now and spring crops in a matter of a few weeks more. If the Stay-At-Home Order is not amended to allow these types of

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products, many food production opportunities will be lost to the public. Later after the order is eased or lifted, consumers will rush to stores to get these types of products, causing an in-person surge and more shortages, instead of allowing them to gradually spread that rush over the next 6 weeks between now and the last frost in mid-May.

If garden products for food production remain classified as non-essential products, consumers already worried about food security will be late in planting their gardens, which will reduce their yields and increase consumer stress. For these reasons, garden products such as:

- Potting soils for growing vegetables in containers
- Raised bed soils for above ground raised vegetable gardens
- Landscape soils and soil amendments for in-ground garden plots, holes and to replace erosion losses,
- Organic manures and chemical fertilizers to provide crop nutrients
- Mulch products to conserve on water use, control soil temperatures (hot & cold), prevent soil erosion, and reduce weeds without chemicals.
- Vegetable seeds, starter plants and plugs for food production and
- Any related garden products to support food crop production

should be classified as essential materials and essential supply chain manufacturers for hardware stores, building materials stores, garden centers, nurseries and other businesses covered in the March 31 ACCD memo to retailers.

We respectfully request that this change be made to best serve the public interest in greenhouse and home food crop production. We further hope that mulch and soil producers will be able to continue to support a concerned public in Vermont as we are in many other states in this time of national emergency and do our part, along with many other critical stakeholders, to help our country get through this very trying time.

Thank you for considering our input. We look forward to hearing from you soon.

Please do not hesitate to reach out with any questions.

Sincerely,



Robert C. LaGasse
Executive Director

cc: Anson Tebbetts, VT Secretary of Agriculture
MSC Board of Directors