

May 5, 2024

Hello EMSWCD Board members,

Thank you for the opportunity to give input into the future of Headwaters Farm.

My name is Sue Nackoney and I own and operate a certified organic farm that began at Headwaters in 2015. I grow mixed vegetables, herbs and flowers that I sell at the Portland Farmer's Market (PFM) flagship market on Saturdays at PSU.

Before I began at Headwaters, I had apprenticed and worked on several local small-scale sustainable and organic farms in Oregon from 1995-2002, including Gathering Together Farm and 47th Avenue Farm. I stopped farming in 2002 when my first child was born, also because I did not see a clear path forward for developing a farm when land was priced out of my reach. I do not have a trust fund, family members who own farmland, or much financial support from outside, and had the added consideration of how to contribute to supporting my family of two children. When I learned about Headwaters I immediately saw an open door to developing a farm business and accessing land.

I graduated in 2019, and while my farm business underwent major changes due to changes outside my control, I was still able to continue my farm business. Without the support of Headwaters program and staff, especially Rowan Steele, I would certainly have closed the farm. Specifically the Beginning Farmer Partnership with PFM secured a new market for my produce and helped me to widen and diversify my offerings to include more products.

As a certified organic farm, I was extremely alarmed at the suggestion by the agronomist Michelle Armstrong that herbicides and fumigants should be used at Headwaters. These are considered "Prohibited Substances" under the National Organic Program, which is the law under which organic farms are required to comply. Not only is that illegal for any organic farm already established at Headwaters to use these chemicals, but also it will be impossible for any incoming farms to be certified organic for three years after those substances are applied, or ever, if those substances continue to be applied.

It is true that weeds pressure at Headwaters is high. The small-scale farmer is always weighing the tension of how to control weeds and remain profitable. However, I feel it is also important to note that weed, disease and pest pressure at Headwaters is part of the legacy of abuse in the hands of extraction of topsoil by past nursery operations. Topsoil can not be simply created, it is a long term process and a treasure to be conserved. Also the surrounding nursery neighbors are using high nitrogen (N) inputs that will create succulent plant growth, draw in pests, and then the nurseries spray and those pests will go to places like Headwaters and become a heavier pressure than if those nurseries and heavy N users were not present. Weeds may or may not be the biggest problem for a farmer. There are organic farms who use a philosophy of farming "with weeds" and others who have been able to eradicate weeds from their soil seed bank, a legacy of years of diligent mechanical weed control. Unfortunately,

leasing land for a short time does not allow a farmer to receive the benefits of a long-term weed reduction program.

To the comment that soil nitrogen (N) was low, anyone with a basic understanding of soil will know that N will be low unless there is supplemental fertilizer. N will leach from the soil in the rainy winter, for example, so I apply organic N to all my crops at planting in spring/summer and may supplement during the life of the plants. I only apply N to the actual planting bed tops, not to the entire field, in order to economize on this expensive fertilizer. It is not a problem with soil fertility that random sampling of N at Headwaters would be low, actually it is a positive sign of soil health and conservation in the ecosystem, where excess N would otherwise be leached into waterways and cause the well-documented myriad of problems that ensue.

To the point of the farmer critic who would like to see more berries grown at Headwaters, they are missing the point of the program. Headwaters is not a demonstration farm or an educational farm. It is an Incubator Farm program, a place where farmers with a business plan who were vetted during application have a fighting chance to start a farm in what is otherwise an extremely difficult economic proposition. Berries are an investment, and one that may not pay off during the term of the program before they would have to be moved, or abandoned when the farmer graduated.

Personally I feel like I had a very positive experience at Headwaters and that it is the reason my business is still in operation today. Beneath the criticism from Mr. Rossi, I sense an antagonism towards the type of small-scale farming happening at Headwaters. Perhaps it is not Headwaters that is failing, but our food system that is broken because it focuses on practices that also destroy the health of humans and all our living co-habitats on the planet with the use of toxic chemicals in the name of profits over any care about the consequences. "Fixing" Headwaters with the very tools that destroy soil and ecosystems in the first place is very misguided and will destroy the program completely.

If Mr. Rossi and other critics truly cared about the future of Headwaters, I would imagine a very different conversation, one in which we talked about **why** there is a problem with weeds and farmer attrition. It would focus on helping farmers to gain a capital and equity position during their time at the incubator. And most importantly, it would help all these farmers to secure the land base they need in order to continue to farm after graduation. The USDA considers all farmers with 10yrs or less in business as "beginning farmers". Here's my most important question: how can Headwaters be a model in this country for truly and deeply supporting beginning farmers and sustaining farms that will light the way to a future so full of nourishment and health that we can only begin to imagine? That is the question I would like to see answered and well-funded.

Thank you for your consideration,

Sue Nackoney

she/her

farmer/owner

Gentle Rain Farm

Certified Organic