



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 1
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February 13, 2014

David Mears, Commissioner
Vermont Department of Environmental Conservation
1 National Life Drive, Main 2
Montpelier, VT 05620-3520

Chuck Ross, Secretary
Vermont Agency of Agriculture, Food and Markets
116 State Street
Montpelier, VT 05620-2901

Dear Commissioner Mears and Secretary Ross:

The purpose of this letter is to augment my January 17, 2014 letter, calling specific attention to the need to focus on additional measures for South Lake and Missisquoi Bay.

As noted in the January 17 letter, based on the results of the Scenario Tool, EPA believes it will take an aggressive application of all of the measures in the Proposal to achieve water quality standards. However, the Scenario Tool also indicates that for two lake segments, Missisquoi Bay and the South Lake, additional measures will be required beyond those described in the Proposal. Please ensure that your final Proposal includes a description of the additional actions or measures that will be taken in these lake segment watersheds. EPA is available to assist in evaluating the effectiveness of potential additional measures using the Scenario Tool. For example, EPA's preliminary analysis suggests some additional phosphorus reductions may be achieved from forest lands with increased implementation of certain forest management practices. These reductions from forested areas will help, and it's important that they be added to the Proposal, but additional reductions will also be needed from other sectors. Agricultural land is the dominant phosphorus source in these watersheds, and it is therefore essential that the Proposal include an especially strong commitment to phosphorus reductions from agricultural lands in these watersheds. An evaluation of the suite of proposed additional measures with the Scenario Tool should be included to demonstrate that these measures, in combination with the measures proposed in November will be sufficient to achieve the reduction targets in these critical segments. If the effects of certain proposed measures are not feasible for simulation using the Scenario Tool, then the alternative basis for determining their effectiveness should be described in the Proposal.

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As always, EPA stands ready to assist your agencies in this effort.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Perkins', written in a cursive style.

Stephen S. Perkins
Office of Ecosystem Protection

cc: Kari Dolan, VT DEC
Laura DiPietro, VT AAFM