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Ms. Kari Dolan
Ecosystem Restoration Program Manager
DEC Watershed Management Division
1 National Life Drive Main 2
Montpelier, VT 05620-3522

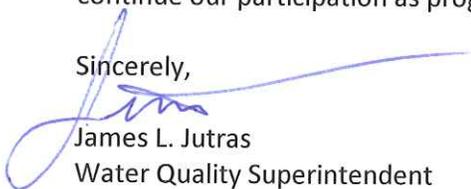
Dear Ms. Dolan

Thank you very much for your outreach efforts with EPA regarding the "Draft Proposal for a Clean Lake Champlain". The proposed plan presents a much more accurate picture of the complexity of the matter before Vermonters and distributes the remediation initiatives to where more emphasis is needed.

- Like many of our colleagues, Essex Junction supports efforts to reduce pollutant loading from non NPDES sources where significant improvement have not been made to date.
- Focus effort where greatest gains in phosphorus reduction can be made in the most cost effective manner.
- Broad-based funding that distributes the burden of phosphorus reduction to a much wider cross-section of Vermonters than those who live in communities with NPDES permits.
- Consider a hierarchy review process that encourages priority based on the lowest cost per pound of Phosphorus removed first.
- NPDES permittees should be encouraged to perform at a higher level of Phosphorus removal without penalty: Reward good behavior, don't penalize it with tighter permit standards. We highly encourage the DEC to work with facility representatives to this end.
- Allow municipalities to use Integrated Stormwater and Wastewater planning strategies supported by EPA to focus phosphorus reduction on a priority basis and across permit boundaries within their own community.
- Allow innovation and alternative implementation strategies. One size does not fit all.
- Continue to enhance stakeholder involvement in program development details.
- Nutrient offsets and some verifiable nutrient trading should be considered for cost effective implementation across permit boundaries or program silos: i.e.: Consider a municipal offset program as applied to agricultural programs.
- Consideration of working outside of specific watersheds when attainment is harder to reach and focus efforts there. Watersheds with the largest problems in attainment will have the greatest impact on phosphorus reduction in the broader lake.

Thank you for the opportunity to provide input at this stage of the process. Essex Junction plans to continue our participation as programs are developed for implementation.

Sincerely,


James L. Jutras
Water Quality Superintendent