



September 28, 2017

Ms. Kari Dolan
Program Manager
Clean Water Initiative Program
Vermont Dept. of Environmental Conservation
One National Life Drive
Montpelier, VT 05620-3522

Via Email: Kari.Dolan@vermont.gov

Re: Vermont Clean Water Fund Final Draft Distributions for the FY19 Draft Budget

The Lake Champlain Committee and the Vermont Chapter of the Sierra Club again appreciate the opportunity to comment on the Vermont Clean Water Fund Final Draft Distributions for the FY19 Draft Budget. Having commented thoroughly on the previous Draft Recommendations, here we only offer comments on the allocation of the bond premium funds that were not included in the Draft Recommendations.

The "Summary of SFY2018 - 2019 Clean Water Appropriations," notes that \$2,259,988 is available from the "FY19 Capital Bill: Bond premium from sale of bonds." It is our understanding that this bond premium has not been allocated to any Sectors or programs. To date, the Municipal Wastewater Control Sector and the Developed Lands and Roads Sector have received adequate funds due to the infusion of Capital bond money. However, as we stressed in our comments on the FY19 Draft Recommendations, more funds need to be allocated to the Agricultural Pollution Control and the Natural Resources Restoration Sectors, as many of the programs in these sectors cannot utilize restricted money from capital bonds or the state and federal transportation money. The additional funds from the bond premium, while restricted in use, will allow more unrestricted funding from the Property Transfer Tax Clean Water Surcharge to be shifted to assist the agricultural and natural resources sectors, essentially swapping out unrestricted funds for restricted funds where possible.

To reiterate past comments, more unrestricted funds overall should be shifted to agricultural programs, particularly technical assistance for farmers, as capital funding is largely dedicated to development, municipalities, and roads projects. Agricultural technical assistance programs are important early in this clean water process. These programs will pay dividends in the immediate future as management practices change and less phosphorus and sediment is discharged into Vermont waters. As we have also mentioned in the past comments, if the Agency of Agriculture, Food & Markets is at distribution capacity due to limited staff, the funds for programs such as the Agronomy and Conservation Assistance Program (ACAP) should be distributed as a block grant to other groups, particularly the UVM Extension.

It is inequitable that municipalities have received abundant funds for pollution reduction from roads and other impervious surfaces while the agricultural community lags behind with a \$14 million gap because of the expediency and low political risk of Capital funds. The agricultural sector contributes the highest percentage of any sector to the phosphorus and sedimentation runoff that pollutes Lake Champlain and Vermont waters. Reduction of these sources of pollution is among the most cost-effective remedies available and more funding should be shifted to this sector. One-time funding will have a big impact on clean water in the long term.

As to the Natural Resources Restoration Sector, we reiterate our previous comments that more funds need to be allocated to this program for easements, land purchases, and restoration projects. For some floodplains, particularly those in agricultural use to grow crops such as corn, the most effective way to protect water quality is simply to ease or purchase the land so it is taken out of use. More projects and programs in the natural resources sector are eligible for capital funds than in the agriculture sector, and a concerted effort should be made to take more floodplain and river corridor lands out of agricultural production from willing sellers.

We appreciate the explanation of the various funding sources and programs that support natural resources restoration articulated in the *Summary of Public Comments on the Fund Allocation Priorities for the Clean Water Fund Board, September 6, 2017*. But, we nonetheless continue to highlight the need for more unrestricted funds to help identify willing sellers of land in river corridors and flood plains that can then be purchased with capital funds in subsequent years.

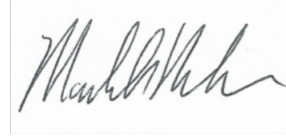
We recommend that the \$200,000 from the Clean Water Fund currently recommended for planning purposes be bolstered by unrestricted funds that can be shifted from other programs and replaced with bond premium money. These funds can help establish the foundation of a buy-out program from willing sellers to take river corridors and flood-prone lands out of agricultural production. Once such parcels and sellers are identified, capital funds could be used to implement this approach in subsequent years. Further, if payments to an owner for identified lands are spread out over several years, more lands could be removed from production immediately with the knowledge that future capital funds will be used to continue payments to willing sellers.

In conclusion, we again thank you for the opportunity to comment on the proposed FY19 allocations from the Clean Water Fund Board. We ask that the unallocated bond premium funds be used to offset unrestricted funds from programs that are eligible for capital funds to bolster the underfunded Agricultural Pollution Control and the Natural Resources Restoration Sectors.

Sincerely,

A handwritten signature in blue ink, appearing to read "Lori Fisher".

Lori Fisher
Executive Director
Lake Champlain Committee

A handwritten signature in black ink, appearing to read "Mark Nelson".

Mark Nelson
Chair
Vermont Chapter of the Sierra Club

Albin D. Voegele
292 French Hill Road
P.O. Box 147
Saint Albans, Vermont 05478

29 September 2017

VIA: Email

Vermont Department of Environmental Conservation
ATTN: Clean Water Initiative Program
1 National Life Drive, Main 2
Montpelier, VT 05620-3522

Greeting:

By way of introduction, The Town of Saint Albans Select Board has appointed me to serve as the Town's representative to the Northwest Regional Planning Commission (NRPC) and (separately) as a member of the NRPC Clean Water Advisory Committee. In those capacities, I would like to make several comments regarding the Clean Water Program.

With the support and assistance of the NRPC the Town of Saint Albans (TSA) is beneficiary to the following programs: (1) the Regional Water Education Program, (2) the Eco-Restoration Program, (3) help with the Road Erosion Control Inventory and (3) Phase 1 of the French Hill Road Stream Geomorphic Assessment.

More recently the Town has received a number of grants to repair and improve roadside control of water run-off. Without exception the Town Manager, Director of Administration and the Director of the Department of Public Works are extremely appreciative of all the assistance and support they have received from the NRPC to address the difficult and expensive interventions needed by the Town's MS4 permit to improve the quality of the water running into Lake Champlain.

In summary, on behalf of the Town of Saint Albans and personally, it is our hope that the Clean Water Initiative Program funds will continue as important resources for municipalities to meet MS4 requirements for storm water mitigation. Concurrently, it is our hope that the Northwest Regional Planning Commission will be afforded all the financial resources it needs to continue its mission in actively assisting and support municipalities comply with the goals and requirements of its MS4 permits and proactively remediate the damages to our ecosystem caused by neglect and historical lack of educational information.

Respectfully,

Al Voegele

From: Adam Lougee <alougee@acrpc.org>
Sent: Tuesday, September 19, 2017 10:31 AM
To: ANR - Clean Water VT
Subject: Comments of ACRPC regarding funding of Clean Water Act Implementation
Attachments: Adam Lougee.vcf

Dear Sir or Madam:

The Addison County Regional Planning Commission believes DEC needs to dedicate funding to creating a project pipeline in order for this program to be successful. ACRPC believes the pipeline needs to go beyond identifying and prioritizing projects. While that is a good first step, it is only a first step. It does not create a project that is "Ready to go". In order to create a project ready for construction, DEC must support the interim steps of planning, engineering and budgeting for priority projects identified. Both VTrans and BGS devote considerable resources to creating their pipeline. When they present to the legislature, they use multi-year budget cycles that request funding for planning and engineering, and then construction. Rolling forward, this creates the pipeline of projects completed. DEC should consider a similar process for its priority projects.

Sincerely,

Adam Lougee, Director
ACRPC



From: Nancy Mongeur [mailto:nmongeur@gmail.com]
Sent: Saturday, September 09, 2017 9:54 AM
To: ANR - Clean Water VT <ANR.CleanWaterVT@vermont.gov>
Cc: Myott Larry <larry.myott@gmail.com>; Hendrickson Ray & Hilda <hillhendy@surfglobal.net>
Subject: Clean Water Fund Comments

Good Morning,

As I sit here worried about my winter home that is about to get slammed by Irma, I'm also worried about my registered homestead on Lake Carmi in Franklin, VT.

The water quality is deplorable and deadly. Most of the camps are second homes that pay higher taxes and most take their household water directly from the lake. So to close public access to the lake because it is toxic is the least that can be done and not enough. This poison is getting into our homes.

When you have to close your windows so the smell doesn't ruin dinner, when you can't wash or shower or do your dishes, things have gone too far.

Many of us around the lake are doing what we can to help prevent further contamination like policing our septic systems, doing shoreline environmental projects, switching to environmentally friendly personal and household products. Many farmers are investing greatly to help remediate the problem (while others simply can't afford too).

All this helps to prevent further contamination but it will take a huge and costly effort to get rid of the toxins already present in the lake.

If this lakes cannot be cleaned up, the whole Lake Champlain basin is doomed. Lake Carmi is the 4th largest lake fully contained within Vermont and eventually runs into Lake Champlain. I'm not being an alarmist; this is fact.

The State of Vermont owns a huge portion of our shoreline and owns a huge obligation towards helping to getting it clean. Not to mention the State's obligation to its citizens. Without clean water humankind dies.

Please include in your budget funding to enforce already established laws, provide financial assistance to help landowners and farmers to do the right thing, fund research and, most importantly, fund remedial solutions to clean up the lake. Save Vermont!

Below are a few photos for your reference (I wish we had smell-a-photo). There are better examples on the webpages.

You can also see a constant stream of Lake photos and concerns at the following web pages:

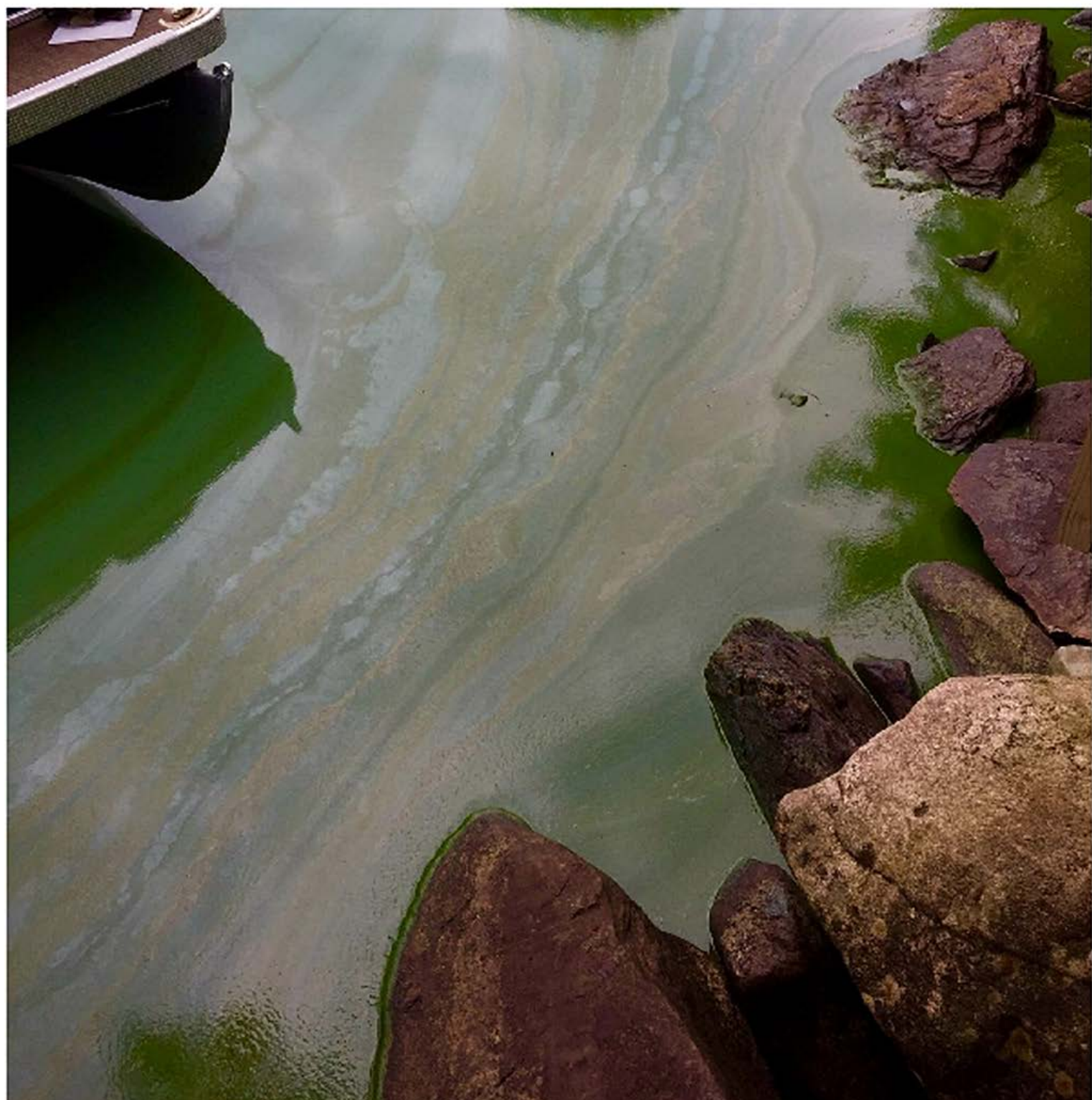
<https://www.facebook.com/groups/74001133924> - Lake Carmi Campers

<https://www.facebook.com/Friends-of-Lake-Carmi-214912375235939/?fref=ts> - Friends of Lake Carmi

<https://www.facebook.com/franklinwatershed/?fref=ts> - Franklin Watershed Committee

Thank you for listening. Please do the right thing.

Nancy Mongeur
Lake Carmi
Franklin, VT









Adam Lougee, ACRPC
President

Tom Kennedy, SWCRPC
Vice-President

Charlie Baker, CCRPC
Secretary/Treasurer

**VAPDA Comments on the
 Clean Water Fund FY19 allocations**
 September 28, 2017

Thank you very much for the opportunity to provide comments on the proposed FY19 Clean Water Fund Allocations. VAPDA believes that investing in water quality is a necessary and important long-term investment in our State that will improve our environment, health, and economy.

- **Allocation #3 - Increase investment in Tactical Basin Planning.** To do a better job of integrating the partners (RPCs, conservation districts, watershed associations, municipalities) in the tactical basin planning process more resources are needed. In FY17, the RPCs received \$330,000 for this work to integrate the municipalities. We recommend, based on conversations with the conservation districts, that \$500,000 is needed to fully integrate the partners into the basin planning process.
 - **Allocation #6 - Increase Investment in Project Development.** There is a clear need for increased investment in getting non-transportation projects ready for capital funding. It appears that there are about 20% CWF funds available for the transportation projects (Allocations #13 and 14). The same percent of investment needs to be invested in developing high-priority, non-transportation projects from the tactical basin plans to determine which projects in each sector will achieve the greatest water pollution reduction per dollar invested. Currently, there is only 7% in CWF in Allocation #6. We recommend increasing the investment in project identification, planning, and preliminary engineering under Allocation #6 to between \$460,000 and \$900,000. This investment is critical if we are to getting projects ready for capital investment.
 - **Allocation #7 - Municipal Grants in Aid Pilot Project.** This has been extremely successful in its first year as a pilot program and we are pleased to see additional funds proposed for next year. This project could serve as a model for project delivery in future years. The second year of this program should continue to be managed by DEC in partnership with the RPCs to provide for continuity of the program for municipal officials. We support this increased investment in this program.
2. **Grant Applications.** We sincerely appreciate the level of effort and investment that the State has put into developing new revenues and programs for water quality improvement. We are hearing a lot of concerns from applicants about the number and timing of the grant application processes. We ask DEC and VTrans to consider whether the grant application cycles could be reduced so that there is one round in the late Fall to correspond with municipal budget cycle and a second round in the late Spring. We would also ask you to consider reducing the number of applications to just two types – one for transportation and the other for non-transportation projects. This would allow the agencies to determine the most appropriate funding source without doing separate applications for each.
 3. **Cost Share.** The State of Vermont should examine cost share requirements and consider lowering or eliminating cost share for high priority projects identified during basin planning or other project development processes.

Respectfully submitted by Charlie Baker, VAPDA Natural Resource Committee Chair. Thank you for your consideration.

Strengthening the Capability of Governments



September 26, 2017

Attention: Clean Water Initiative Program
Department of Environmental Conservation
1 National Life Drive, Main 2
Montpelier, VT 05620-3522
anr.cleanwatervt@vermont.gov

Dear Commissioner Boedecker:

I am writing on behalf of the Windham Regional Commission (WRC) to comment on the proposed Clean Water Fund Fiscal Year 2019 Budget Priorities. The WRC has long partnered with its towns, the Agency of Natural Resources, the Windham County Natural Resource Conservation District, watershed and fish and wildlife organizations, and other partners to identify, plan for, and implement clean water initiatives. Clean water affects our health, quality of life and our regional economy. The quality of our waters is in many ways the embodiment of the quality of much of the work that we do as a regional commission. Indeed, it is one of the principle drivers of the policies contained within our regional plan. We are thrilled that the legislature and ANR have recognized the roles regional planning commissions do and can play in the implementation of the Clean Water Initiative Program.

First, I'd like to comment on the value and exceptionally smooth roll out of the Grants In Aid project. This was an excellent means by which to further raise awareness within the towns of the Municipal Roads General Permit, help them get work underway so they understand what the permit requires and how it is to be implemented, and to carry out a "sea trial" of sorts to begin implementation of the rule to understand what works and what needs to be improved.

Our chief concern is that there seems to be a lack of priority placed on the definition and design of projects. In addition to the development of basin planning and the identification and prioritization of projects, funding for the scoping and engineering of projects is essential. I have attached a summary of the VTrans Project Definition Process Guidebook for your reference and pasted in the process flow chart. It is our experience that the project design and development workflow for water quality and habitat projects is ostensibly the same as that one would follow for transportation or other infrastructure projects. We have followed this workflow for several projects using ecosystem restoration grant funding.

You may also want to consider if there are efficiencies to be had through a contracting process similar to the VTrans design-build initiative. That could result in getting projects done more quickly for less money with high-performance results.

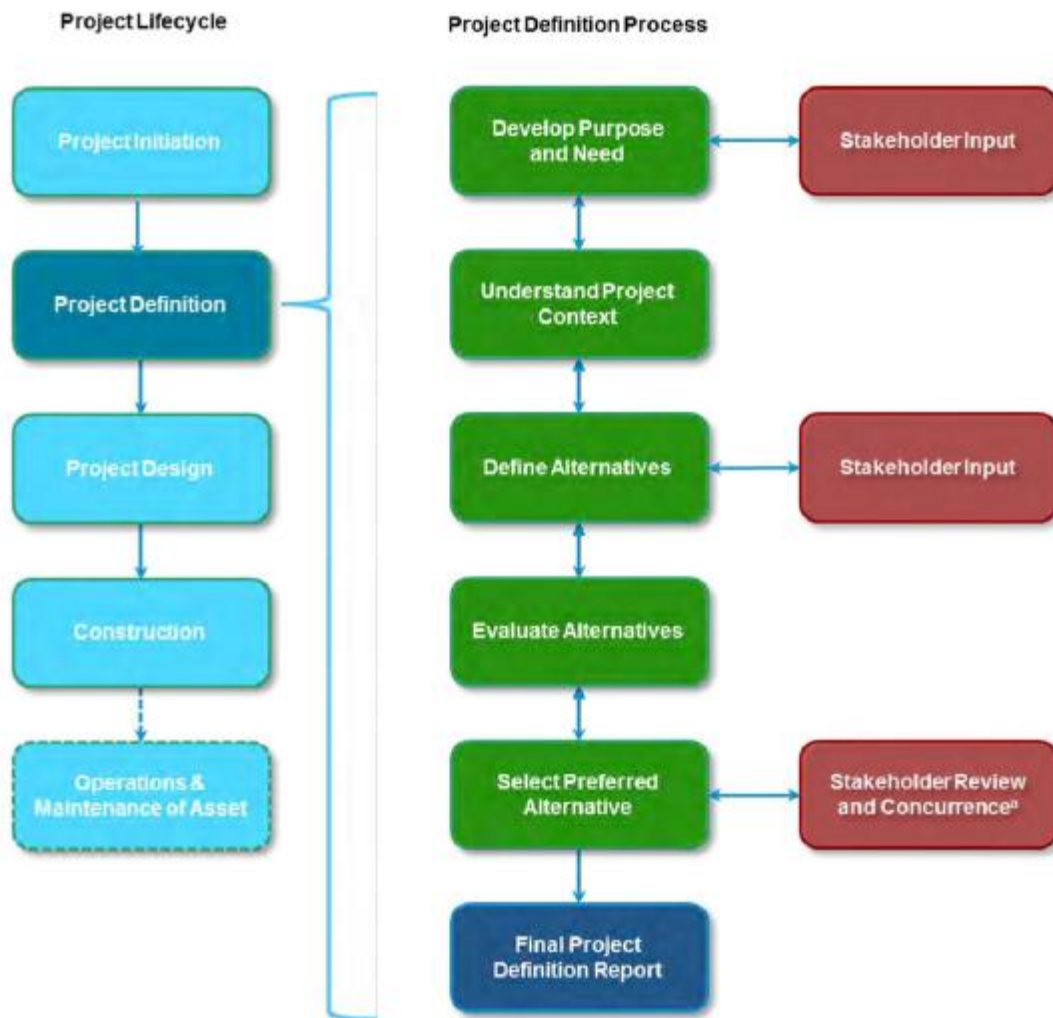
Thank you for your consideration of our comments. Please let me know if you have any questions.

Sincerely,



Chris Company,
Executive Director

Figure ES.1 Project Definition Process



^a "Stakeholder review and concurrence" means that stakeholders have been presented with a description of the preferred alternative and why it was selected; have been provided the opportunity to comment on the selection; and that VTrans has considered any stakeholder concerns and addressed them to the extent practical. The final determination of the preferred alternative is made by VTrans considering all stakeholder input.

From: Catherine Dimitruk <cdimitruk@nrpcvt.com>
Sent: Thursday, September 28, 2017 4:29 PM
To: ANR - Clean Water VT
Subject: Clean Water Fund Comments

Northwest Regional Planning Commission Comments
Clean Water Fund FY19 allocations
September 28, 2017

Municipal Grants in Aid Pilot Project. This has been extremely successful in its first year as a pilot program and we are pleased to see additional funds proposed for next year. This project could serve as a model for project delivery in future years. The second year of this program should continue to be managed by DEC in partnership with the RPCs to provide for continuity of the program for municipal officials.

Cost Share. The State of Vermont should examine cost share requirements and consider lowering or eliminating cost share for high priority projects identified during basin planning or other project development processes.

Project Development. A significant, targeted investment must be made in project development. Relying solely on grant applications from willing partners will not result in development of the most effective projects for improving water quality. The State of Vermont should identify and fund the development of projects that are identified as high priorities in the Basin Planning process.

Public Outreach and Information. Providing detailed, easily accessible public information about projects that are funded and completed and publicizing project successes will help to build support for the programs. It will also encourage additional participation from municipalities and property owners.

Common Grant Application. The amount of funding available is of tremendous benefit to Vermont's communities and landowners and is appreciated. However, each month there are one or more grant applications announced or due, and it is challenging to find the resources to apply for the grants and often difficult to determine which is the best grant program for individual projects. In future years, NRPC encourages the Agencies to work together to develop common application materials and streamlined, coordinated application processes.

Thank you for considering NRPC's comments.



Catherine Dimitruk | *Executive Director*
Northwest Regional Planning Commission | 75 Fairfield Street, St. Albans, VT 05478
Phone: 802.524.5958 | **Fax:** 802.527.2948 | **Website:** www.nrpcvt.com

From: Jim Sullivan <jsullivan@bcrcvt.org>
Sent: Tuesday, September 19, 2017 1:00 PM
To: ANR - Clean Water VT
Subject: Clean Water Fund Comments

The Bennington County Regional Commission would like to reinforce other comments regarding the need to include sufficient project development costs in the final budget. Some water quality improvement projects are straightforward and can be accomplished with relatively little pre-development planning and design, but others are complex and may involve work in and around sensitive environments and infrastructure. Moreover, an assessment of needs, and of project benefits and costs, will help to ensure that important projects continue to move forward and that the most critical are identified as priorities for implementation. Funds spent on project development should never reduce the effectiveness of the initiative, of course, but a reasonable set aside for project planning will go a long way toward ensuring its long-term value to the state. Regional planning commissions have worked with the state and local governments for many years to identify and “scope” transportation projects, thus ensuring that the most critical needs are met in the most cost-effective manner possible. Similar consideration should be given to implementation of projects addressing the water quality needs of the state.

Thank you for your time and consideration,

James Sullivan
Director
Bennington County Regional Commission
111 South Street - Suite 203
Bennington, VT 05201
802-442-0713 x5
jsullivan@bcrcvt.org

From: James H. Maroney, Jr. <maroney.james@gmail.com>
Sent: Sunday, September 10, 2017 3:32 PM
To: ANR - Clean Water VT
Subject: Clean Water Week Comments/Suggestions

Dear Kari:

I will keep this short in the hope that these three points will make an impression.

1) Vermont passed Act 64, the so-called “Clean water law,” which the secretary never loses an opportunity to remind us will take twenty-five years to take effect. Yet the state is already celebrating clean water as if it had already been attained, when irrespective of its flaws (see below) the law has not even been funded.

2) Virtually all of us on both sides of the debate agree that conventional dairy is the largest contributor to both lake pollution and to greenhouse gas generation. Yet by design Act 64 imposes no material constraints upon the conventional dairy industry, which the law permits to continue business as usual.

3) State support for the conventional dairy industry has been based for fifty years upon helping farmers lower costs, which savings they convert to new capacity — more land, more cows, larger barns and equipment in order to make more milk. But since the industry is drowning in milk, bigger production means steadily falling prices, which drive small and medium-size farm attrition, which means more land on which large conventional farmers spread NPK fertilizer, the principal cause of lake and atmospheric pollution.

James H. Maroney, Jr.

Oliver Hill Farm
1033 Bullock Road
Leicester, VT 05733
Cell: (802) 236-7431

September 20, 2017

Kari Dolan
Clean Water Initiative Program
Department of Environmental Conservation
1 National Life Drive, Main 2
Montpelier, VT 05620-3522

Dear Kari Dolan,

Thank you and the Clean Water Board for giving the public the opportunity to provide comments regarding the Clean Water Board's proposal for FY19 allocations. The opportunity for the public to provide input in the budget allocations is essential considering that surface water quality is a public resource and the maintenance and restoration of water quality provides public benefit.

The Clean Water Initiative should strongly consider devoting funding for project development, including preliminary feasibility analysis, project scoping and design, and cost estimation. Devoting funding to project development will ensure that there are numerous projects ready for bidding and construction in the future. Without these critical steps, projects are not developed to level where they are ready for construction.

The Municipal Grants-In-Aid Program has been extremely popular and successful in our Region, as 27 out of our 30 towns participated in the Program this year. We recommend that the Clean Water Initiative Program continue to expand the Municipal Grants-In-Aid Program as municipal roads are a large source of sediment pollution and continue to be a long-term maintenance concern for municipalities. As municipalities work towards improving their roads to meet the Municipal Roads General Permit (MRGP) more money should be devoted to road related projects.

Sincerely,



Peter G. Gregory, AICP
Executive Director

CC: Michael Storace
Planner

William B. Emmons, III, Chair ~ Peter G. Gregory, AICP, Executive Director
128 King Farm Rd. Woodstock, VT 05091 ~ 802-457-3188 ~ trorc.org

Barnard ~ Bethel ~ Bradford ~ Braintree ~ Bridgewater ~ Brookfield ~ Chelsea ~ Corinth ~ Fairlee ~ Granville ~ Hancock ~ Hartford
Hartland ~ Newbury ~ Norwich ~ Pittsfield ~ Plymouth ~ Pomfret ~ Randolph ~ Rochester ~ Royalton ~ Sharon ~ Stockbridge ~ Strafford
Thetford ~ Topsham ~ Tunbridge ~ Vershire ~ West Fairlee ~ Woodstock

From: Peter G. Gregory <pgregory@trorc.org>
Sent: Monday, September 25, 2017 9:14 AM
To: ANR - Clean Water VT
Cc: Tom Kennedy; Charlie Baker; Christopher Damiani
Subject: Clean Water Fund Comments

Hello;

Additional comments I have for you to consider. These are shared by other regional planning commission directors.

1. If you really want to incent communities to invest in projects that may have huge water quality improvements, you must be more flexible on match amounts.
2. Are you statutorily directed to require 50% match on Lake Champlain municipal projects? If not, why would a program be set up to dampen enthusiasm for tackling projects that may have a direct link in addressing the TMDL?
3. There are many projects around the state, that could have a major positive impact on pollution reduction, that no sponsor (municipality, watershed group, RPC) will ever take on because of the match. I recommend that you consider these "state" projects, funded at 100% and have the RPCs manage them for you. We already do construction management on roadway and ACCD HUD funded disaster construction projects.

Thank you.

Peter G. Gregory, AICP
Executive Director



Two Rivers-Ottawaquechee Regional Commission
128 King Farm Road | Woodstock, Vermont 05091
(802) 457-3188 | (802) 457-4728 - fax | (802) 558-9064 - cell
pgregory@trorc.org | trorc.org | [TRORC facebook](#)

From: Bob Buermann <rbuermann@hotmail.com>
Sent: Thursday, September 28, 2017 10:27 PM
To: ANR - Clean Water VT
Subject: Clean Water Fund Comments

The Grants in Aid pilot project has had a very successful first year. Additional funding as proposed would be welcome. The partnership between DEC and the RPCs has ensured an efficient roll out of the program with a simple and efficient grant process and onsite technical assistance. South Hero is one of the first communities in the state to complete our work, constructing 10 new BMPs on 2 connected road segments. If the program remains as is, South Hero will be interested in continuing to participate in future years and this could serve as a model for providing grant funds to municipalities.

Regards,
Bob Buermann
21 Richards Road
South Hero

email rbuermann@hotmail.com cell 802-238-4492 home 802-372-5470

From: Tasha Wallis <tasha@lcpcvt.org>
Sent: Tuesday, September 19, 2017 3:14 PM
To: ANR - Clean Water VT
Subject: FW: Clean Water Fund Budget

Below are comments submitted by the Lamoille County Planning Commission regarding the Clean Water Budget per the public process.

Thank you for your time and consideration.

Project development is critical to ensure that there are “shovel ready” projects in future years. Most communities have neither the personnel (town engineers, public works staff) or financial resources to complete project scoping and development without State support. Project development also identifies opportunities to incorporate water quality into other municipal infrastructure investments – such as major road repairs or pedestrian infrastructure upgrades – allowing limited public funds to be used to the maximum benefit.

Tasha Wallis

Executive Director

Lamoille County Planning Commission

52 Portland Street | 2nd Floor | PO Box 1637 | Morrisville, VT 05661

email: Tasha@lcpcvt.org | website: www.lcpcvt.org

direct dial: 802-851-6346 | main number: 802-888-4548

Steven A Judge
75 Lyon Road, P.O. Box 476
Royalton, Vermont 05068
802-763-7963
vermontmilk@gmail.com



September 21, 2017

Attention: Clean Water Initiative Program
Department of Environmental Conservation
1 National Life Drive, Main 2
Montpelier, VT 05620-3522

Dear Board Members, Clean Water Initiative Program

Enclose please find my recommendations for steps that can be taken to clean up Lake Champlain. I also included my resume as a way of introduction.

I owned and operated dairy farms in Shoreham, Vermont for over a decade and am very familiar with the nutrient and sediment pollution entering Lake Champlain from agricultural sources.

Best of luck,

A handwritten signature in black ink, appearing to read "S. Judge", with a long horizontal flourish extending to the right.

Steven A Judge

Five Simple Steps for Cleaning Up the Lake Champlain Watershed And Lake Champlain

- 1) Require cover crops for all tilled agricultural land that would otherwise be left open during the late fall, winter and early spring.**
- 2) Prohibit the spreading of manure on bare ground lacking cover crops outside of the growing season.**
- 3) Allow the spreading of manure outside of the growing season until December 1st and after April 1st ONLY on fields that have cover crops or perennial crops that are capable of retaining the manure and preventing runoff.**
- 4) Develop state programs that will provide incentives for farmers in the Champlain Valley and other sensitive regions of Vermont to plant perennial forage crops such as hay, trefoil and alfalfa instead of corn. Limit the intervals that those fields can be plowed to every three or five years.**
- 5) In 2014 50,000 tons of commercial fertilizer were applied to Vermont's cropland. The spreading of commercial fertilizer must be carefully regulated and commercial fertilizer applicators and their employees should be required to receive formal training and be certified.**