

## Tabular Summary of Public Comments on the Fund Allocation Priorities for the Clean Water Fund Board

# Public Comments

|  | General | General - Funding | General - Process | Process - Transparency | Process - Regional Equity | Table #1 - Priorities | Table #2 - Allocations | Enforcement | Monitoring and Assessment | Education/Outreach, Technical Assistance |
|--|---------|-------------------|-------------------|------------------------|---------------------------|-----------------------|------------------------|-------------|---------------------------|--|
| <b>General Comments</b>  |         |                   |                   |                        |                           |                       |                        |             |                           |  |
| Process lacked adequate opportunity to provide input prior to releasing draft priorities   |         |                   | X                 |                        |                           |                       |                        |             |                           |  |
| Board meeting did not allow for engagement and the development of priorities   |         |                   | X                 |                        |                           |                       |                        |             |                           |  |
| Unclear how the allocations were determined  |         |                   |                   | X                      |                           |                       |                        |             |                           |  |
| Stakeholder input is critical to achieve improvements and build support  |         |                   | X                 |                        |                           |                       |                        |             |                           |  |
| Lack of transparency has hindered ability to provide substantive comments  |         |                   |                   | X                      |                           |                       |                        |             |                           |  |
| Fund is to be a dedicated fund for clean water projects, not to offset budget shortfalls   |         | X                 |                   |                        |                           |                       |                        |             |                           |  |
| Allocations that focus on programs rather than projects adds to the uncertainty  |         |                   |                   | X                      |                           |                       |                        |             |                           |  |
| Priorities should reflect the timeframe of commitments established in Act 64   | X       |                   |                   |                        |                           |                       |                        |             |                           |  |
| A website should be established containing information to explain priorities and allocations   |         |                   |                   | X                      |                           |                       |                        |             |                           |  |
| Extend the comment period after information regarding allocations is public  |         |                   | X                 |                        |                           |                       |                        |             |                           |  |
| Use a collaborative, sustained & statewide public engagement effort to promote a water ethic & show progress                                 | X       |                   |                   |                        |                           |                       |                        |             |                           |  |
| Seek stable funding from uses that generate impacts and from fines through enhanced enforcement  |         | X                 |                   |                        |                           |                       |                        | X           |                           |  |
| Ensure that the Clean Water Fund provides for a statewide approach for water quality improvement   |         | X                 | X                 |                        |                           |                       |                        |             |                           |  |
| Recommendations should be divided into transitional (to be phased out) & operational (continual) activities                                  | X       |                   |                   |                        |                           |                       |                        |             |                           |  |
| Identify all state & federal funding to a priority area to show resources already available to help justify proposal                         |         | X                 |                   |                        |                           |                       |                        |             |                           |  |
| Provide information on the effect of each action to see which produces results (environmental outcomes)                                      | X       |                   |                   |                        |                           |                       |                        |             |                           |  |
| Volunteer organizations involved in fundraising, assessments, monitoring, raising awareness and cleanups can only do so much without funding |         | X                 |                   |                        |                           |                       | X                      |             |                           |  |

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| <b>General Comments (continued)</b>   |         |                   |                   |                        |                           |                       |                        |             |                           |  |
| Remove all references specific to watersheds in Table 2; recommendation #1, #6, and #14 are earmarks. Table 1 priorities provide sufficient guidance to ensure highest quality projects receive funding |         |                   |                   |                        |                           | X                     | X                      |             |                           |  |
| Failure to regulate the import of phosphorus-containing fertilizer will frustrate efforts to restore water quality  | X       |                   |                   |                        |                           |                       |                        |             |                           |  |
| The least expensive option is to prevent impacts and treat the cause of pollution, rather than the results  | X       |                   |                   |                        |                           |                       | X                      |             |                           |  |
| Best Management Practices are not practical, effectiveness is speculative, there is a lack of incentives to adopt them, there is a lag time before seeing results                                       | X       |                   |                   |                        |                           |                       |                        |             |                           |  |
| Clean Water Fund should not become a replacement for other funding programs but an addition over existing funding levels, in recognition of the water quality challenges                                |         | X                 |                   |                        |                           |                       |                        |             |                           |  |
| <b>General Comments - Geographic Specification</b>  |         |                   |                   |                        |                           |                       |                        |             |                           |  |
| Target the impaired waters of the Connecticut River; this watershed should be a priority  | X       |                   |                   |                        | X                         |                       |                        |             |                           |  |
| Geographic equity is important; all waters should benefit with the enforcement of TMDLs   |         |                   |                   |                        | X                         |                       |                        |             |                           |  |
| Address erosion and water quality issues of the Connecticut River   |         |                   |                   |                        | X                         |                       | X                      |             |                           |  |
| Conservation commissions and the Connecticut River Watershed Council need support to address problems   |         |                   |                   |                        | X                         |                       | X                      |             |                           |  |
| Geographic equity is important for non-Lake Champlain projects  |         |                   |                   |                        | X                         |                       |                        |             |                           |  |
| Support high priority projects across the state, including the Connecticut River Valley watershed   |         |                   |                   |                        | X                         |                       |                        |             |                           |  |
| The Connecticut River watershed has the same water quality needs as Lake Champlain; support regional equity   |         |                   |                   |                        | X                         |                       |                        |             |                           |  |
| Make Lake Carmi, an impaired water, a state priority  |         |                   |                   |                        | X                         | X                     |                        |             |                           |  |
| Support the Connecticut River watershed which is impaired for nitrogen and subject to a TMDL  |         |                   |                   |                        | X                         |                       |                        |             |                           |  |

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| <b>General Comments – Compliance and Enforcement</b>   |         |                   |                   |                        |                           |                       |                        |             |                           |  |
| DEC should be properly funded to provide farm oversight and enforcement  |         |                   |                   |                        |                           |                       |                        | X           |                           |  |
| Agricultural impacts could be reduced by eliminating violations via an enforcement (rather than grants) program  |         |                   |                   |                        |                           |                       |                        | X           |                           |  |
| Connecticut River buffers are often narrow or non-existent, best practices are not being followed, runoff is causing environmental & health impacts                                |         |                   |                   |                        |                           |                       |                        | X           |                           |  |
| Increase enforcement using frequent inspections & increase other regulatory activities to increase compliance  |         |                   |                   |                        |                           |                       |                        | X           |                           |  |
| Best Management Practices should be required   |         |                   |                   |                        |                           |                       |                        | X           |                           |  |
| Concerned that the State has a poor record of enforcing existing vegetated buffer requirements   |         |                   |                   |                        |                           |                       |                        | X           |                           |  |
| <b>Table #1: Clean Water Fund Priorities</b>   |         |                   |                   |                        |                           |                       |                        |             |                           |  |
| Add to Priority C (riparian buffer restoration) “to minimize the risk of flood damage”   |         |                   |                   |                        |                           | X                     |                        |             |                           |  |
| Target Vermont’s impaired waters   |         |                   |                   |                        |                           | X                     |                        |             |                           |  |
| Support Priority C (riparian buffer restoration) and G (land acquisition) as the least expensive way to restore water quality, flood resilience & improved fish & wildlife habitat |         |                   |                   |                        |                           | X                     |                        |             |                           |  |

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| <b>Table #2: Agency of Agriculture (Recommendations #1-#3)</b>  |         |                   |                   |                        |                           |                       |                        |             |                           |  |
| Increase allocations for conservation planning & technical assistance, necessary for implementation           |         |                   |                   |                        |                           |                       | X                      |             |                           | X  |
| Support conservation districts in their work to provide technical and educational assistance                  |         |                   |                   |                        |                           |                       | X                      |             |                           | X  |
| Establish a grant fund to assist farmers in meeting cost-share requirements of state & federal programs       |         | X                 |                   |                        |                           |                       |                        |             |                           |  |
| Develop guidelines for technical assistance providers for managing referrals to local, state or fed. programs |         |                   |                   |                        |                           |                       |                        |             |                           | X  |
| Promote grass-based dairying statewide as a value-added, lower impact opportunity                             |         |                   |                   |                        |                           |                       | X                      |             |                           |  |
| Providing incentives & funding assistance to farmers to implement Best Management Practices is essential      |         | X                 |                   |                        |                           |                       | X                      |             |                           |  |
| Farming in watersheds with impaired waters such as Lake Carmi must be held to a higher standard               |         |                   |                   |                        |                           |                       |                        | X           |                           |  |
| Support allocation to purchase conservation easements and curtail agricultural activity in impaired waters    |         |                   |                   |                        |                           |                       | X                      |             |                           |  |
| Support technologies to enhance implementation of agricultural best management practices                      |         |                   |                   |                        |                           |                       | X                      |             |                           |  |
| Eliminate language, "Lake Champlain as first priority" and focus on highest ranking projects statewide        |         |                   |                   |                        |                           |                       | X                      |             |                           |  |
| <b>Table #2: All Sectors (Recommendations #4, #5)</b>   |         |                   |                   |                        |                           |                       |                        |             |                           |  |
| Support partner support (recommendation #4)   |         |                   |                   |                        |                           |                       | X                      |             |                           | X  |
| Include in partner support (rec. #4) assistance in project development to meet need of rural communities      |         |                   |                   |                        |                           |                       | X                      |             |                           | X  |
| Support partner monitoring (recommendation #5)  |         |                   |                   |                        |                           |                       | X                      |             | X                         |  |
| Support partner monitoring (recommendation #5) to identify, track stream conditions over time                 |         |                   |                   |                        |                           |                       | X                      |             | X                         |  |
| Provide \$10,000 to the Lewis Creek Association to target and track water quality investments                 |         |                   |                   |                        |                           |                       | X                      |             | X                         |  |
| Support a statewide volunteer stream monitoring and sampling planning initiative                              |         |                   |                   |                        |                           |                       | X                      |             | X                         |  |

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| <b>Table #2: Agency of Natural Resources – Municipal Stormwater (Recommendations #7-#9)</b>   |         |                   |                   |                        |                           |                       |                        |             |                           |  |
| Support stormwater project planning and implementation (recommendations #7, #8)   |         |                   |                   |                        |                           |                       | X                      |             |                           |  |
| Increase stormwater project planning for FY2017 (recommendation #7) to maintain funding levels  |         |                   |                   |                        |                           |                       | X                      |             |                           |  |
| Do not support municipal capital equipment assistance (recommendation #9), since this is to meet urban needs, which should already have contracted these services or secured equipment; rural communities under-resourced |         |                   |                   |                        |                           |                       | X                      |             |                           |  |
| <b>Table #2: Agency of Natural Resources – Natural Resources (Recommendations #10-#12)</b>  |         |                   |                   |                        |                           |                       |                        |             |                           |  |
| Support wetland, river and floodplain restoration (recommendations #10-#12)   |         |                   |                   |                        |                           |                       | X                      |             |                           |  |
| River and riparian restoration (recommendation #11) should not be applied to VT Housing & Conservation Board (VHCB)-supported projects in recognition of existing state funds being used to support VHCB                  |         |                   |                   |                        |                           |                       | X                      |             |                           |  |
| Support actions that provide for flood mitigation as well as water quality, such as easements & land acquisition  |         |                   |                   |                        |                           |                       | X                      |             |                           |  |
| Request \$20,000 in 2015/2016 winter season to support survey and engineering work associated with moving a dam on Lake Harvey in the town of Barnet further upstream to reduce accumulation of silt                      |         |                   |                   |                        |                           |                       | X                      |             |                           |  |
| Recommend highest priority on retiring entire floodplains to restore floodplain forests & wetlands, targeting lands subject to repeated flooding and repetitive crop loss   |         |                   |                   |                        |                           |                       | X                      |             |                           |  |
| Support floodplain restoration over buffers; buffers have limited benefits such as filtering pollutants   |         |                   |                   |                        |                           |                       | X                      |             |                           |  |
| Recommend that wetland and floodplain restoration (recommendation #10) & river corridor restoration (#11) receive FY2016 funding  |         |                   |                   |                        |                           |                       | X                      |             |                           |  |

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| <b>Table #2: Agency of Natural Resources – LiDAR Mapping (Recommendations #13)</b>   |         |                   |                   |                        |                           |                       |                        |             |                           |  |
| Support LiDAR mapping  |         |                   |                   |                        |                           |                       | X                      |             |                           |  |
| <b>Table #2: Agency of Natural Resources – Wastewater Treatment (Recommendations #14)</b>  |         |                   |                   |                        |                           |                       |                        |             |                           |  |
| Eliminate this allocation; source is 3% of the problem and contribution is meaningless to meet \$78 million in need in Lake Champlain Basin and other funding streams are available, including user fees |         |                   |                   |                        |                           |                       | X                      |             |                           |  |
| Remove earmark to the Lake Champlain Basin; EPA requires nitrogen reduction plans as part of all discharge permits in the Connecticut River watershed  |         |                   |                   |                        |                           |                       | X                      |             |                           |  |
| <b>Table #2: Agency of Transportation – Municipal Roads (Recommendations #15-#16)</b>  |         |                   |                   |                        |                           |                       |                        |             |                           |  |
| Support municipal gravel & paved road planning & implementation  |         |                   |                   |                        |                           |                       | X                      |             |                           |  |
| Modify proposal to support inventory & prioritization for the first two years & implementation in later years  |         |                   |                   |                        |                           |                       | X                      |             |                           |  |
| Note the Hazard Mitigation Grant Program funds as another leveraged fund to support this work  | X       |                   |                   |                        |                           |                       |                        |             |                           |  |
| Support \$500,000 for FY2017 to support regional planning commissions assistance to municipalities   |         |                   |                   |                        |                           |                       | X                      |             |                           | X  |