

## Vermont Clean Water Board Meeting Minutes

Date/Time: Tuesday, October 22, 2019, 2:30 – 4:30 pm

Location: National Life Davis Building – 1 National Life Drive, The Catamount Room (N215)

---

### Clean Water Board Members/Designees:

Susanne Young, Agency of Administration (AoA) Secretary and Clean Water Board Chair

Ted Brady, Agency of Commerce and Community Development (ACCD) Deputy Secretary

Bob Flint, public member

Joe Flynn, Agency of Transportation (VTrans) Secretary

James Giffin, public member

Christopher Louras, public member (absent)

Julie Moore, Agency of Natural Resources (ANR) Secretary

Anson Tebbetts, Agency of Agriculture, Food and Markets (AAFM) Secretary

Chad Tyler, public member (absent)

- 1) Welcome, Overview of Agenda, Approval of Meeting Minutes** **2:30-2:35 pm**  
Agency of Administration Secretary and Clean Water Board Chair Susanne Young
  - June 12, 2019 meeting minutes approved
  - August 22, 2019 working meeting minutes approved
  
- 2) Draft Clean Water Fund Current Year Unallocated Balance and Contingency Reserve** **2:35-2:42 pm**  
Agency of Natural Resources Secretary Julie Moore (information only)
  - The Clean Water Fund current year unallocated/unreserved balance is \$900,000 (recurring revenue) and prior year unallocated/unreserved balance is \$218,808 (non-recurring revenue) due to higher than anticipated revenues; if the Clean Water Board recommends adjusting the contingency reserve from \$950,000 to \$500,000, additional \$450,000 in non-recurring unallocated/unreserved revenue would be available
  - Noted unclaimed bottle deposit escheats reporting and revenue collection began October 2019; limited data/experience available to update anticipated revenues
  - Draft October 17, 2019 proposed SFY 2021 clean water budget provides recommendation for use of unallocated/unreserved revenue
  
- 3) SFY 2021 Clean Water Budget**
  - a. Budget Process, Public Comments, and Recommended Adjustments** **2:42-2:55 pm**  
Secretary Julie Moore (information only)
    - Meeting materials contain all public comments received in response to the draft SFY 2021 clean water budget via online questionnaire, August 22, 2019 public hearing, and other comments submitted by email
    - The Clean Water Initiative Program summarized public comment themes and suggested options to address public comment themes for the Board's consideration
  
  - b. Response to Agricultural Land Use Practices and Enforcement Concerns** **2:55-3:03 pm**  
Agency of Agriculture, Food and Markets Secretary Anson Tebbetts (information only)
    - AAFM is focused on agricultural nonpoint source pollution
    - Secretary Tebbetts explained that in 2018, AAFM:

- Held 366 educational events statewide with approximately \$1.3 million invested across the state to educate farmers and partners on new approaches to agriculture;
  - Funded 87 BMPs; financing includes costs for cover cropping after corn harvesting and no-till practices, which focused on a new approach for not disturbing soils and improving soil health;
  - Made 652 quality compliance visits; and
  - Issued 118 enforcement actions totaling \$69,000 in penalties; thirty cases were referred to ANR and seven individual cases were referred to the Vermont Attorney General with a total of \$115,000 in fines
- The proposed budget redirects more resources to compliance and enforcement than the public comment draft

**c. Discuss and Finalize SFY 2021 Clean Water Budget Recommendation 3:03-3:17 pm**

Secretary Susanne Young

- Bob Flint asked if the proposed SFY 2021 clean water budget incorporates reducing the contingency reserve from \$950,000 to \$500,000; Secretary Moore responded yes, it proposes authorizing \$450,000 in non-recurring unallocated/unreserved revenue from the contingency reserve, \$218,808 non-recurring prior year unallocated/unreserved revenue, and \$900,000 reoccurring current year unallocated/unreserved revenue
- Secretary Young asked if the Board ever had to dip into contingency reserve; Secretary Moore responded the State accessed the contingency reserve once, required by statute, to fund initial response of \$50,000 for Lake Carmi’s designation as a “Lake in Crisis”
- Motion to approve SFY 21 budget made and seconded; discussion followed
- Bob Flint asked if level of clean water investment is aligned with what the State of Vermont can afford, and how the State is doing compared to other states, considering its size; Secretary Moore cited a U.S. Environmental Protection Agency letter indicating the level of investment is acceptable to support the Lake Champlain phosphorus reductions over an estimated 20-year timeframe
- Bob Flint asked if, given experience over last few years, the State is meeting its targets; Secretary Moore responded yes and cited the Vermont Clean Water Initiative Annual Investment Report that tracks state investments and reflected on substantial amount of work completed over the past few years
- Secretary Young reiterated next steps: the approved SFY 2021 clean water budget will be sent to the Department of Finance and Management, incorporated into the administration’s proposed budget and presented to the Governor
- Motion to approve recommendation passed

**4) Establishment of Clean Water Service Providers (Act 76 of 2019) 3:17-3:33 pm**

Department of Environmental Conservation Water Investment Division Director Neil Kamman

- Provided update on implementation of Act 76 of 2019
- Bob Flint commented that he did not remember this process being quite as convoluted and asked if ANR anticipates it will take this long; Neil explained the Act requires Clean Water Service Providers be established by November 1, 2020, which will allow Providers one year to establish before receiving funds to begin implementing projects November 1, 2021
- Bob Flint asked what the Regional Planning Commissions’ (RPC) role will be in the process; Neil answered that statute does not specify the entities that will

serve as Clean Water Service Providers; Secretary Moore clarified that a prior version of the bill proposed RPCs serve as Clean Water Service Providers but the bill enacted does not

- James Giffin asked if ANR expects there to be organizations willing to serve as Clean Water Service Providers in every region of the state; Neil anticipates there will be willing organizations, but if not, the State may need to operate “business as usual” or utilize other block grant models

**5) Status of Clean Water Fund Program Audit due January 15, 2021**

**3:33-3:40 pm**

Secretary Susanne Young

- AoA will post a Request for Proposals to select a contractor to complete the Clean Water Fund Program Audit this fall

**6) Public Comments**

**3:40-4:28 pm**

Secretary Susanne Young

- Public comment with four minutes allotted per individual (summary of public comments on pages 4-8)

**7) Next Steps, Closing Remarks**

**4:28-4:30 pm**

Secretary Susanne Young

- The Board agreed to schedule a February meeting if needed to review revenue updates
- Susanne Young entertained a motion to adjourn. Secretary Moore motioned; Bob Flint seconded the motion; meeting adjourned

**8) Adjourn**

**4:30 pm**

Supporting Materials:

1. June 12, 2019 Draft Clean Water Board Meeting Minutes (Page 1)
2. August 22, 2019 Draft Clean Water Board Working Meeting Minutes (Page 28)
3. Clean Water Fund Revenues vs. Appropriation (Page 4)
4. Clean Water Funding Factsheet (Page 5)
5. SFY 2021 Clean Water Budget Public Comment Package (Page 6)
6. Draft Updated SFY 2021 Clean Water Budget (Page 41)
7. Draft Updated SFY 2021 Clean Water Budget Line Item Descriptions (Page 42)
8. Act 76 Overview (Page 48)
9. Draft Clean Water Fund Program Audit Scope of Work (Page 52)

## Vermont Clean Water Board Meeting Minutes – Public Comment Attachment

Date/Time: Tuesday, October 22, 2019, 2:30 – 4:30 pm

Location: National Life Davis Building – 1 National Life Drive, The Catamount Room (N215)

---

### Public Attendees Recorded

John Barrows	Deborah Hartenstein
Paulette Bogan	Kent Hartenstein
Katherine Brewer	Catherine Lajeunesse
Jared Carpenter	Caterina Lamanna
Laurel Casey-Ansley	Adam Lougee
Jane Clifford	Lyn Munno
Michael Colby	Kathryn O'Neill
Andrea Englehardt	David Putter
Ernie Englehardt	Dan Albrecht (Skype)
Nancy Everhart	Jess Buckley (Skype)
Judith Fisher	Eric Perkins (Skype)
Elizabeth Gribkoff	Holden Sparacino (Skype)
Reed Hampton	Kathy Urffer (Skype)
Vanessa Hampton	

### Public Comments

3:40-4:30 pm

Secretary Susanne Young

- Public comment with four minutes allotted per individual

**John Barrows:** We don't have enough money in the fund, probably need about 10 times the amount. Know we've done a lot since 2015, it's a small step and long ways to go, but don't think \$20 million goes far enough. Know there's other money, \$50 to 60 million, about the amount in a school budget. Thinks agriculture, Missisquoi Bay, etc., should be a part of Lakes in Crisis. Glad to hear Neil mention there is a protection grant program, think will be very critical in this process. Been promoting this idea for years for farms that drain on the side of hills like Lake Carmi. If the state bought rights for land, so there won't be any nutrients put in the land, would solve a lot of the problems. That would be a permanent solution you won't have to keep paying. BMPs Secretary Anson mentioned should be mandatory and not occasional. Another pet peeve is the Cyano-tracker, which is basically someone going out one to two times per week. Have sent pictures to the Department of Health. A lot goes unreported, specifically in Carmi, and not as accurate as it should be. Would hope that in areas like Button Bay, there should be someone there every day.

**James Maroney:** Everyone in this room knows that there are essentially three sources of phosphorus pollution: stormwater runoff approximately 45%, wastewater treatment facilities 5% and agriculture 45%. The state doesn't seem to know there is a tremendous difference between the first two and the third. We're not going to stop driving and going to the bathroom, it's not going to stop raining. The only way to fix the pollution coming from stormwater runoff and WWTF is with money. We've got some money there, which I see is necessary to spend. The third one however, agriculture, is voluntary – we don't need to do it at all. We import 95% of our food in Vermont and dairy farmers present 1% of the national supply of milk. Vermont agriculture could disappear tomorrow and virtually nobody outside Vermont would notice, and probably most consumers wouldn't notice, putting aside cultural affinities. Eric Smeltzer, who did a study of the TMDL a couple of years ago, said this lake is capable of absorbing about 500 tons of phosphorus. It's getting now around 800 tons, 300 tons too much and 60% of that is coming from agriculture. Conventional ag is the problem. We didn't have this problem 25 years ago, something in the agriculture has changed. Vermont has said they've been working on it since 1984 and virtually nothing has changed but costs. Some of you may have seen a survey from VPR, said that 95% of Vermonters support dairy. Question was, do you think dairy farming is important to the state as it views itself. Survey that had to do with general questions about life in Vermont. In the article that come out in

Vermont Biz, Secretary Tebbetts you said you were working very hard to fix dairy farmers' problems. What are you going to do? Everyday I come in with a stack of bills and I can't pay them. Losing \$100,000 per year. What will you do about that?

**Reed Hampton:** Spoke a bit at the last meeting on Lake Champlain. Believe the Agency of Agriculture is failing with their enforcement. We've had numerous outbreaks every time we have any kind of a storm surge. You can call up, you can complain, and nothing happens. Certain large CAFOs and large farms out there that take advantage of this. There's no one watching and they're doing whatever they want to do. It's a disgrace.

**Vanessa Hampton:** Built home on Button Bay. Every day walk around Button Bay and pick up garbage, so it looks nice, good for wildlife. Last few years haven't been able to swim in the lake. Have become sick breathing in whatever in the manure that's different now. When picking up garbage, go up to Basin Harbor, go out to the point and go further down, Arnold Bay, go all the way down to marina that is coated green. Point is this, tourists are asking - what's with the lake. Forty percent of the GDP in the state of Vermont is tourism. Tourists are asking if they can go in the water, can't lie. We're right on Champlain, people will revolt, people won't pay taxes. Not against the farmer, came from farming background in England, know how it was done 40-50 years ago. It wasn't cows dying after three or four years, wasn't cows standing in their own [expletive]. Wasn't that at all. It was them eating grass. Then the farmers standing out bullying you and looking at you. Scared to live where I live for my own health, scared because the retribution of the farmer and just can't see agriculture overseeing itself. It should be overseen and enforced.

**Paulette Bogen:** From Panton, Bed & Breakfast owner on Lake Champlain. Very small part of tax goes into the budget. Again, would like to reinforce tourism brings in a lot more money than agriculture. Piece of information I would like to know – even though fines have been assessed to farmers, how much of those assessed fines have been collected? Again, the Department of Agriculture cannot self-monitor or self-evaluate. Representatives from ANR and AAFM came to Panton for small town hall meeting. Asked, how much of those fines assessed were collected? Those representatives from those departments did not know. In past two years have had to warn guests not to swim right off our dock, from a very deep part of our lake. Milfoil was in Button Bay and a little bit north of Button Bay, now it has come down almost to Arnold Bay and there are plants in Arnold Bay and we're at a very deep part of the lake. In past seven years we are now seeing milfoil where I haven't before, now having to warn my guests not to swim in lake. Guest are writing reviews (at least one) talking about quality of the lake. That's out there on internet, can't be pulled back and that's going to part of what damages the future in Vermont, because tourism and not agriculture is bringing in a lot more money into Vermont. Please do consider not having AAFM monitor itself and do put money into best practices for farmers.

**Rob Cormier:** Don't know any of these people here but hearing same reoccurring themes. Big reoccurring theme is not about money but it's about public policy. Money's going to help but if we do some simple things to change public policy will make a big world of difference. If you as a group can recommend to Lakes in Crisis bill like we did for Lake Carmi – we ran a great system on how to get money and attention. Think there are worse areas than Lake Carmi that don't have the resources. Have to get water out of agriculture, it's the biggest thing but we have the fox guarding the hen coop. Reoccurring theme, seeing it over and over again. Have to get a mutual entity evaluating. Need to get water out of agriculture and back to ANR. Not anti-farming, just anti-pollution. Here in the State of Vermont, pollution looks like two things: either a municipality's dumping into the lake or it's dairy, clear cut. We don't have huge industries. Needs to be a moratorium on banning of spreading and can use Lake Carmi as an example; it's a bowl it's all going down. If you ban spreading on Lake Carmi, it's going to drop outbreaks. We need some kind of tracking system on outbreaks. Need to start pivoting out of dairy. If agriculture drops out of Vermont, nobody would notice. Hemp is not the answer, need to figure out one way to pivot to a sustainable agriculture market that feeds our system and helps stops the pollution.

**Laurel Casey-Ansley:** Thank you guys for what you're trying to do, ironically, it's not a money issue, it is the laws we don't have. Cyanobacteria all over my property is making me sick, making my renters sick. It's getting worse, what's going to happen is someone is going to die. It'll make national news. Cyanobacteria goes

airborne for 18 miles. Eighteen miles inland of lakes in Vermont and everyone's going to get sick. Dairy is dying. People are stopping eating dairy, know it's not good for you. Even farmer friends are trying to sell properties. They keep spreading manure and keep their cows because they're trapped. Would be great if the state can buy property and turn into a land trust. Just saying, the good news for those of us are very upset – it's going to get bad fast. What's happened in just last three years with the gallons and gallons of rain coming down quickly and it goes right to the lake. There's nowhere else it will go. We thought this is something that might happen, and it's happening now. Good news is, it is going to get worse, people will get very sick, probably going to have to get together and sue the state. Not a small problem, a disaster, horrific. When it gets on the front page of the Times maybe we can go do something about it. Trust that sometimes we have to hit the bottom before we go up.

**Michael Colby:** Some other good news, one is the people in the room. I commend you for this patience. These people are on the front line of what is a war. It's not agriculture, what you're promoting Anson with these big CAFOs, it's agri-warfare. These people on the frontlines, they didn't ask for this war. But in their yards, in their waterfront, in their air, it is an assault. I've been to their properties; it breaks your heart to go there. Please, visit these places, seeing how they're living, it's an abomination, a disgrace. Good news, we know exactly why it's happening, no mystery. It's the CAFOs, the large farms. All across the country, map it out, where do these people live, where are the biggest CAFOs? It's a one and one relationship. Here's an obscenity – while we're trying to spend this money, AAFM is handing out more and more permits for large farms. In the last five years the number of farms with more than 700 hundred cows, at least the ones reporting, have doubled in past five years. People are living the way they're living and you're handing out permits. All small farms and medium farms, they're part of this assault too, this agricultural warfare going on. What happened with cyanobacteria outbreaks in that same five-year period? Increased 141%. There's no mystery here. Have to get Anson's agency to get their act together and do their job. Can anyone on the Board tell me how much pesticides were put on the land last year? You can't because he's not following the law and for the past six years, he hasn't told the public, which he's required to do. Required by statute to report to the public every year how many pesticides are being used in the state. Last time he did it, 2013. How can you talk about water and a plan when you don't have data? How can you talk about a plan when the cause is being encouraged? Again, good news, people are waking up, the state is waking up, we're telling this story and we're going to get action. Please help us sooner rather than later.

**Response from Secretary Young:** For the record, Tebbetts has not been AAFM Sectary since 2013.

**Deborah Hartenstein:** Live south of Button Bay. Since everyone's saying the same thing, would like to make one comment: the solution to the pollution is not dilution. Will also say, I've been in this property 20 years next week, and you never get used to the smell of manure. It doesn't smell the same way it did 15 years ago. It's burning, your eyes hurt. You don't want to hang your clothes out. You don't want to have guests over. Can't open windows at night, never get used to it. And we drink this water, we drink it and most people in our region have super high-end water filtration systems even though we have municipal water to drink. This is not an uncommon occurrence. This is a picture Paulette showed on June 21<sup>st</sup> which hit the airwaves on NPR and VPR.

**Andrea Englehardt:** From Lake Carmi. We do appreciate all the resources for Lake Carmi. It has to be \$2 million if you count the State Park. And the years of work – Neil wrote our TMDL in 2009. He's been in it for a decade, but today the lake is blooming and it's worse than ever. I think we can conclude we have to do something else. Consider banning manure in our watershed and see what happens. She mentioned something about a death – our camp is 50 feet from Dicky Brook. Lucky we don't live there. Dicky Brook was named after Dicky Reinveldt who died of ALS. The more I read; ALS is tied to cyanobacteria. We don't like smell of manure but what will state do if all of a sudden people are getting sick? Did you do everything you can do to make sure people don't get sick? Feel bad when the school bus goes by, students breathe it. At the retirement home, people can't leave. When we see the blooms, we do leave. Asking for manure bans in the watershed as a test case, to see if it helps. Landscape has changed but phosphorus has to go down. Even with our \$1.5 million aeration this fall it is still blooming constantly. We know you're trying, but I think you're going to have to step

out of the track and try something different. Becoming a huge health crisis, not just for us, but for Lake Champlain. Thank you for the work but it's not going to cost as much as a lawsuit.

**Ernie Englehardt:** Made a statement in the Lake Carmi Campers Association spring newsletter, said health alert signs were common on Lake Carmi last summer and fall of 2018. And in my understanding, there hasn't been any changes in past year. Wanted to remind people quickly that Carmi is a Lake in Crisis. Some of the discussion that lead up to that, is that it can be seen as a laboratory. Carmi is a small lake, surround by agricultural use. We know where point and nonpoint sources are, where phosphorus is coming into the lake. Request that AAFM and ANR take some pretty aggressive action on Lake Carmi, since it is small it can be a laboratory to see what can be done to reduce amount of phosphorus coming into the lake. A lot of RAPs (Required Agricultural Practices) in the lake and a lot of BMPs coming in line to help. Think there are a lot of other things that can be done. Perhaps for some of the fields in Lake Carmi there could be less manure spread, see what happens to the crops. May not be a significant difference. Eliminating manure, try it, see if you can get the same yield without as much manure. At same time realize, financial impact on farmers. Appreciate Secretary Young, that there is flexibility in the Clean Water Fund, and if some specific actions are tried, taking a farmland out of farming, or trying a different type of farming that's not very intensive – see what happens then. But part of that can be flexible to compensate the farmers to switch to something else. Please act aggressively in this little lake, hopefully will be results found that can be applied on a larger scale, like Lake Champlain, that are in terrible shape.

**Public Member:** Hospital Creek is near my house, surrounded by farms. It is a tributary to Lake Champlain. Angie Allen just completed a survey that covers 2017 and 2018. I think this Hospital Creek will be identified as an issue, maybe not quite in crisis, but almost there. Can trace all pollution to agriculture in the area. Marina on opposite side of creek, most boats covered in green goo. No real tourism, nobody really wants to move to this area, it's near the Crown Point Bridge. When bought the property we paid \$40,000 in land transfer taxes. We are here by choice; this is a holiday residence. That money – I want to know what happened to it, it's fraudulent. It's fraudulent to write checks like that and see the quality of the lake go down year after year. It's declined in the four summers I've been on the lake. This is our investment money and our retirement money in this house. It's our decision to be there but it's a scary bad decision if that's going to happen to us. Lot of people are here have a lot to lose and the state has a lot to lose. Not sustainable to continue to run a state like this. Vermont must lead, not follow by chasing laws and statutes. Just racing to the bottom. To lead is to start a legislative process that gets glyphosates, manure, all of these things, out of our supply. We tried voluntary, tried enforcement, but the laws have obviously been insufficient.

**Adam Lougee, on behalf of Vermont Association of Planning and Development Authorities (VAPDA):** My focus a bit different than other folks, a lot more focused on budget. Three things to talk about. First, going back to the 2020 budget and talk about funding for watershed groups. Then, Grants-in-Aid briefly, and lastly since Neil brought up Clean Water Service Providers wanted to briefly talk about that as well.

1. Funding for watershed groups: Take you back to December 2018 board meeting. Peter Gregory and some other people testified before you and requested you put in extra \$75,000 for watershed planning. That money went into the top line budget. Watershed groups haven't been able to access it yet. They will be able to access it by going through an RFP, but they haven't been able to get it yet, and if you look at the Clean Water Service Provider timeline, a lot is happening already. That money was intended, as I understand, to get them into a position for them to participate in the water quality planning process. Ask to get that money to the groups quickly; they're important partners to us in the watershed. They do a lot of good work, specifically in Addison County. Do a lot of water testing. Nobody knows the watersheds better than the watershed groups. They're locally active and will be able to help the Clean Water Service Provider in any region. Urge you to help them get more involved in the process.
2. Grants-in-Aid: Looking at clean water budget on page 41, footnote at very bottom of budget. Footnote says "ANR and VTrans leadership have requested staff evaluate efficiencies to be gained by VTrans managing the Municipal Roads Grants-in-Aid Program." RPCs work with municipalities to run that

program. Northwest RPC gets a grant from DEC and distributes to other RPCs who get the money directly to municipalities to help fix their roads. Program runs really well, don't want to see it change significantly, especially in front of an audit. In the past year in SFY 2019, had 193 municipalities participating, over \$2 million in grant funding and \$1.4 million of local match (town money) went into road projects, 836 road segments improved covering 56 miles. It is making a significant difference. Good program and essentially don't want to mess with it.

3. Clean Water Service Providers: RPCs are very interested in participating. In Neil's handout last line about Clean Water Service Providers being responsible for pollution reductions. You all make the rules and give the allocations, we're ready to work on contracts and we'll be held to the timelines for the contracts and bring projects in on budget but being held responsible for achieving reductions that are not yet established scares us.

**Lyn Munno:** Want to quickly echo some of the comments. Watersheds United Vermont represents community-based nonprofit watershed groups that have been key partners for DEC and the state in developing tactical basin plans and implementing clean water projects across the state. Wanting to ask, as we look forward into this year FY2021, 2022, rolling out Act 76, ensuring funds are available to support these community-based watershed groups to help the state achieve clean water goals. Specifically, been working with DEC tactical basin planning staff for years. Received support that watershed groups are key partners in developing these plans. One barrier, watershed groups, unlike RPCs and conservation districts, have not been in state statute as a basin planning partner eligible to receive funds. During 2019 legislative session, part of Act 76, legislature amended 10 VSA Chapter 1253 to include funds to support watershed groups participation in tactical basin planning via Watersheds United Vermont (WUV). Very pleased about opportunity to provide support. Change adds WUV and designees alongside RPCs and conservation districts as entities to receive performance contract for development and implementation tactical basin plans. Changed when legislation went into effect in July 2019. Looking forward to having watershed groups receiving funds in line with the change in statute in current fiscal year and years to follow. Tactical basin support, core of DEC's efforts to restore Vermont waters to reach goals of Act 64 and implementation of Act 76. Will be interesting to see how basin planning works out with CWSP to achieve clean water goals together, even with the regional model. Watershed organizations in conjunction with districts and RPCs are critical partners for the state in achieving these goals. We ask the Clean Water Board to allocate sufficient funds for three groups to work together for tactical basin plans and implementing clean water projects to ensure protection of all Vermont waters.

**Jill Arace:** We too would support the participation of the watershed groups in the basin planning process. Want to thank the board for the increase in funds for agricultural projects in SFY 2021. Agriculture for TMDL presents 40% of problems for Lake Champlain phosphorus and is being asked to contribute to 67-68% of the solution and so far, has contributed quite a bit to the solution, don't want to forget that. I am participating on the payment for ecosystem services workgroup, also looking at supporting the working lands by acknowledging contribution it's making to remediate pollution problems but also adding value environmentally and economically to community. Proposal to come probably before the legislature asking for funds to support a pilot project. Lastly, have some concerns for the Clean Water Service Provider model. Don't want to be set up to be competing with our partners. Don't want this context to be where we're all competing with one another. Have communicated with DEC and participating in process but do have a concern about conflicts of interest and how it will be managed. If people are both acting as implementing and money lenders, seems if there are conflicts of interest hoping it will be addressed in this process.

###