

Ms. Kari Dolan, Manager, Ecosystem Restoration Program  
Department of Environmental Conservation Watershed Management Division  
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January 17, 2014

Ms. Dolan,

I'd like to take this opportunity to comment on the draft state of Vermont proposal for a clean Lake Champlain. In the interest of full disclosure, I am an employee of the Vermont Department of Environmental Conservation, in the Watershed Management Division.

I support the recommendations outlined in the draft proposal as they begin to address aspects of phosphorus management that have not previously been implemented. In particular, moving to address the water quality issues associated with road maintenance and small farms takes us in the right direction.

I'd also like to encourage you to consider changing the vocabulary used in the conversation around this proposal. The terms 'recovery' and 'remediation' suggest to me that there is an end to these focused management practices that reduce phosphorus loading to the lake, though it may be decades into the future, when we can relax and acknowledge a job well done. The reality is that those practices can never end if we are to reach and maintain the water quality we desire on Lake Champlain and all Vermont waters.

There are parallels between the ongoing discussion about climate change and the long history of phosphorus management. Human activities are disrupting natural cycles of storage and assimilation of carbon and phosphorus. The changes we must implement to minimize those disruptions affect all aspects of our society. They are not easy and not temporary but require us to re-think how we conduct our most basic day-to-day activities. As we move forward with our phosphorus reduction strategy, the climate change discussion offers a foundation and vocabulary we can use and build upon.

Sincerely,

Angela Shambaugh

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