



Green Mountain
Water Environment
Association

January 14, 2014

Kari Dolan, Manager, Ecosystem Restoration Program
Department of Environmental Conservation Watershed Management Division
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Dear Ms. Dolan:

Please accept the following comments regarding the Draft State of Vermont Proposal for a Clean Lake Champlain on behalf of the members of the Green Mountain Water Environment Association (GMWEA). GMWEA is an association of Vermont water and wastewater professionals. Our greater than 600 members are “Boots on the Ground”-- 24 hours a day, 365 days a year -- designing, operating, maintaining, and repairing the water, wastewater and stormwater systems in Vermont.

Point Sources

Over the past 20 years, Vermont’s long-term program to reduce phosphorus levels in wastewater discharges to Lake Champlain represents a major success story. As a result of these investments, phosphorus loading to Lake Champlain from Vermont treatment plants has declined by 83% since 1991. During the 1970s, wastewater point discharges made up nearly half of the total phosphorus load to Lake Champlain. That amount has since dropped to 3.1% of the current total load. While it is true that best available technology exists to remove more phosphorus at treatment plants, that technology comes at a significantly higher capital and operating cost with little gain. In essence, we are passing the point of diminishing returns at Vermont’s wastewater treatment facilities.

It is imperative to overcome the perception that issuing more stringent permits for point sources is the only way to ensure phosphorus reductions. This approach is guaranteed to be very costly and will have a diminishing return with limited improvement. If additional requirements to enhance phosphorus removal at Vermont’s wastewater treatment facilities are imposed by the Environmental Protection Agency (EPA) or the Vermont Department of Environmental Conservation (VT DEC), they must also include broad-based funding for those capital improvements. It is unfair and unrealistic to rely on municipalities and their rate payers to solely shoulder the burden of the cost of additional phosphorus removal at wastewater treatment facilities.



In contrast, optimization of treatment performance should be encouraged by setting a realistic phosphorus limit for wastewater treatment plants and supporting those facilities that consistently perform better than their permits require.

Non-point Sources

Studies conclude that non-point sources are contributing almost 97% of the phosphorus currently entering Lake Champlain and its tributaries. We therefore strongly support the current recommendations to reduce phosphorus from the non-point sources. In addition, VTTrans and town highway departments should review and revise current practices for drainage and ditching of public roadways, emphasizing reducing/eliminating direct discharge into waterways. Some reductions could be performed at a minimal cost during routine maintenance. It is recommended that providing education and training for road crews to be able to identify potential problem areas be seriously considered.

A vast amount of contributing land along and adjacent to the lake and its tributaries is privately owned. For any plan to be viable, the State must address these areas with effective legislation to reduce/eliminate any direct runoff, with a means for enforcement if needed.

Public Education and Outreach

No restoration plan will succeed without public support, and we are concerned that, as written, the proposal perpetuates the public perception that addressing water quality is solely the responsibility of the State and does not identify any clear roles for federal partners, technical professionals such as the members of GMWEA, watershed groups, or individuals. It will be critical for everyone to participate in order to achieve our shared water quality goals. Public education/outreach throughout the Lake Champlain watershed regarding the phosphorus TMDL must therefore be a significant component of long term success.

As professionals, it is imperative that we become one voice. EPA, VT DEC, GMWEA and other environmental or public interest groups must come to an agreement and devise a unified statement to deliver to the public. It will be the public that will be required to change current practices, along with paying to clean up the lake and waterways. Our combined statement to the public should stress that, as individuals, our activities and practices have an impact on the lake regardless of where we live in the watershed.

Funding

It is apparent that funding is not infinite and must be a major component in any plan. As part of a funding package, it is recommended that an "environmental tax" on manufactured products that contain phosphorus be imposed.



General Comments

This is a long-term venture. Any visual improvement in lake water quality will take decades, even if all TMDL components are met today. In lieu of meeting TMDL levels, the ultimate deciding factor that progress is being made in phosphorus reduction in Lake Champlain and its tributaries is if the public sees a reduction in cyanobacterial (aka blue-green algae) blooms. Albert Einstein has been quoted to say: “We cannot solve our problems with the same thinking we used when we created them.” With that quote in mind, we cannot ignore the significant nutrient recycling from bottom sediment that occurs in the lake (and will for the foreseeable future) and that the proposal needs to explicitly address this important source. Current and new technology should be explored to address this “legacy” phosphorus, with an emphasis that cost and effectiveness must be deciding factors before any implementation.

In conclusion, we support the clean-up of Lake Champlain regarding the phosphorus issues and understand that everyone contributes and is part of the problem. Success can only be realized, however, if actions taken for improvement are affordable and strategically implemented.

Thank you for the opportunity to provide comments on this important matter.

Sincerely,

Robert Fischer
President, GMWEA

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