

Hi Kari, David, Chuck and Eric,

I browsed the draft Clean Lake Proposal and thank you all for preparing this thoughtful report.

Here are some comments for your consideration.

Summary Matrix

Can you include a quick review "Existing vs After" matrix that includes: how many P loading pounds were and are allocated for each land use category, historic and projected expenses/fees, regulatory vs non regulatory and expected completion dates? This will help viewers more easily compare and evaluate cost benefits etc.

Linking watershed P loading data to your implementation plan.

Can you link your report's categories to the lake tributary's P loading data.

Watershed pounds and instream loading numbers like ours can monitor trends and effectiveness of work within each watershed. This Lake P reduction plan should be watershed based and towns et al should work cooperatively to make improvements. At the reach level, our instream loading data can monitor our collective successes in the shorter term before it all hits the lake. Our local towns have started to help fund our work, and we appreciate that they feel more accountable every year. This report could better support very strategic local sampling like ours as "best available science" when available vs CSA modelling. Our approach is very cost effective if LaRosa services can continue and is easily transferrable. Local data speaks volumes to towns and landowners. Our group is working very closely right now w DEC (Jim Kellogg et al) to fine tune and cost reduce our sampling plan strategies.

Climate adaptation and flood resilience messaging should be included up in the front and liberally throughout the report, including strategic language that would identify and justify certain BMP, AAP, AMP measures designed for predicted more frequent heavy precipitation events. As you know, it is essential to more clearly highlight that the bulk of loading to streams and the lake occurs during higher flows, not to mention when fields are bare. So, to have reasonable assurances of reducing our loadings, we must design for those events vs the benign low flow events. We must come up with heavier rain event numbers that reflect the climate predictions. See attached P Kg/cfs data results for the LaPlatte prepared by Dr. Bill Hoadley for our South Chittenden Riverwatch group.

We have also been talking about buy outs for farms in CSA's or flood prone areas. Direct to Lake SMALL tribs and near lake lands with clay soils flush large amts of P/acre to the lake. With bigger rain events, these little tribs flood onto the large flat adjacent agr fields. The functions and values of these small floodprone DD trib areas must be defined, recognized and improved. This should be included in this report.

Manure spreading

We do have data that affirms what farmers have long known, that spreading during leaf off season (November) is potentially a very poor practice. Spreading at this time should be conditioned to injection only, or where lands are far from surface waters. See attached Powerpoint by Kristen Underwood/SMRC for LCA.

Ditches/swales.

There should be language included that calls for all farm field ditches/swales to be managed as any other stormwater conveyance in VT, namely that they must be disconnected from any road ditch OR stream, wetland (perennial or otherwise) AND managed for nutrient and sediment removal using detention ponds.

Avoiding overland runoff into road ditches will be critical where this problem is substantial in Clay soil areas. There is a hefty Little Otter Study that tells this story well. This strategy should be included.

Basin Plan regulatory information

The basin plans will include regulatory and non reg status reports and recs for the next 5 yrs. This section looks very thin.

Current Use Mgmt Plans

To appreciate tax reductions, Ag mgmt plans and Forest mgmt plans must be dutifully managed, be on the public record and indicate actual steps are scheduled for WQ AAPs and AMP compliance. This is a massive hole in our system since there is NO ag mgmt staff at present and since our AMP and AAPs are based on low flows when P loading is known to not occur. It is entirely unjust to have a forestry mgmt staff while having NO agr mgmt oversight staff.

Thanks for taking these comments.

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