

Dear Kari,

I am Selectboard Chair of my town. Although I have not consulted with my other board members, I would like to share my personal thoughts. After my review of the part related to Municipal Roads, (page 15 of the Proposal) I have questions and concerns.

1. If this is a Proposal for a Clean Lake Champlain, would municipal roads in different watersheds (where rivers flow south into the Connecticut River) be subject to it?
2. Subjecting municipalities to a state permitting system concerns me because it sounds like it could be unnecessarily duplicative of the more reasonable AOT Standards process already in place with municipalities. Small towns (ours has a population of 732 people, from babies to the elderly) run by ever-changing volunteers already struggle to keep up with – and sometimes even identify - too many regs, rules and requests issued by various State agencies.
3. I am concerned because a regulatory permit system is likely to change the timetable for implementation of AOT Standards in an effort to speed up town road drainage improvements. Our town already adopted the latest state transportation Standards for municipal roads. Our understanding with AOT is that we do not need to make immediate wholesale improvements of all town roads to meet those standards, but rather tackle them one portion of a road at a time *at the time* we do *new* work on a town road, and then keep it *ongoing* without regressing. Otherwise costs of improvements to all town roads under an enhanced timetable would be staggering and impossible for current property taxpayers to bear. The AOT is sensitive to this, but the DEC may not have the discretion to be sensitive to cost constraints of permittees under a regulatory system.
4. Subjecting municipalities to a state permitting system would likely introduce penalties, a potential “big stick” in the event of permit violations – even unintended ones.
 - (a) Penalties would be unfortunate for virtually all municipalities and property taxpayers since all are already straining under heavy tax burdens, in part from the state education tax system. My guess is that most violations would occur due to town budget and personnel limitations rather than any desire to flout state regs. Penalties would only hurt the already-hurting.
 - (b) Permits and penalties would be unfortunate for state government as well because I have noticed that the State of Vermont passes more environmental laws and regs than it can reasonably enforce, especially with state employee and budget cutbacks over recent years. This makes for inconsistent and unequal treatment and enforcement, among other problems.

Personally, I consider myself an environmentalist – and I live on a lake that I love – however I also must advocate for a fair and consistent regulatory system and for already-hurting property taxpayers. Small towns cannot afford more than what we have signed onto with the AOT standards, especially with limited grant assistance. The thought of going through a state-imposed inventory, management plan and permitting process with overstretched town volunteers and limited personnel is both aggravating and disheartening as much as we all want clean lakes and waterways.

I could happily be more supportive if some other state regulations and property tax burdens dissolved to make room for this process, but as it stands small towns are already overly-saturated.

Kind regards, -Annette

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