

VAPDA The Vermont Association of Planning & Development Agencies

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Kari Dolan, Manager, Ecosystem Restoration Program
Department of Environmental Conservation Watershed Management Division
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Re: Draft State of Vermont Proposal for a Clean Lake Champlain

Dear Ms. Dolan,

On behalf of VAPDA, I would like to enter the following comments into the record.

All of the Regional Planning Commissions agree to the importance of clean water and the need for everyone to do their share to ensure that the surface waters of Vermont remain clean. In general, the position of VAPDA is that the implementation of any TMDL be:

- A. Fair, All Vermonters contribute to the problem, all Vermonters benefit from clean lakes and streams so all Vermonters should contribute to the efforts to maintain healthy lakes and streams.
- B. Effective, Any measure implemented should produce meaning full improvements in water quality.
- C. Efficient, Limited resources should be spent to achieve the biggest bang for the buck.

With any new legislation, the devil is always in the details. More detailed concerns involve the process of implementation rather than the concept. Some of these concerns are:

- A. Cost to municipalities, Rural towns with a small number of tax payers and miles of gravel roads will face major increases in town highway budgets which cannot be sustained. Urban towns with acres of pre-existing impervious surfaces cannot bear the cost of retrofitting these areas to bring them into compliance.
- B. Permits, Who will issue, who will enforce, will there be fines for violations? What will be the policy for bringing pre-existing noncompliant violations into compliance?
- C. Conflicts between programs, Higher densities being encouraged in down towns and growth centers concentrate impervious surface area and limit the chance for infiltration.
- D. Conflicts between allowed uses of funding sources for projects need to be resolved. Previous watershed restoration projects could now be considered storm water projects and would no longer be eligible.
- E. Does/will one size fit all? Different issues between the Champlain basin and the Connecticut River basin need to be addressed. Different pollutant, different TMDL.
- F. Bang for the \$\$\$, Prior to implementing any action, a plan to prioritize the source of phosphorus should be in place. State studies show a much higher loading from agricultural and developed sources over town highways. Targeting known problem areas over blanket permits will be much more cost effective.