

### **Comments on State of Vermont Proposal for a Clean Lake Champlain.**

Forests produce the cleanest water of any land use. A statewide strategy to protect, conserve and enhance forest cover for water quality ought to be a key ingredient in Vermont's implementation plan to meet the lake's TMDL. Research indicates that on a watershed scale and for riparian buffers water quality impacts can be seen when forest cover goes below 65% and 70% respectively. Vermont is approximately 75% forested with varying fluctuations from watershed to watershed, and site to site. If we do not act now to protect and conserve the forests that currently exists and to strategically enhance forest cover in areas of need to mitigate stormwater runoff, we are being short sighted of our current and future impact on the land, its effect on water quality and the significant value of trees and forests.

Attached is a draft of a white paper that the Department of Forests, Parks and Recreation (FPR) commissioned Stone Environmental to produce that explores the relationship between optimal tree/forest cover, feasibility and water quality. Based on this information and precedent that EPA acknowledged the benefits of trees and forest for water quality in other TMDL's like the Chesapeake Bay, we would like to encourage the creation of a forest cover conservation and restoration strategy in this TMDL.

FPR would welcome partnering with VDEC and EPA to develop such a strategy that would support location-specific tree canopy and watershed assessments, identification of priority areas and adoption of tree cover goals. This process can then support the creation of a system to promote tree cover goals in priority zones, including riparian zones and urban areas, coupled with mechanisms to ensure the maintenance and conservation of existing cover. Protecting, conserving and enhancing forest cover across Vermont's landscape is a critical, cost-effective way to meet water quality goals while attaining many other co-benefits including air quality, wildlife and fisheries habitat, and sustainable communities.