

December 28, 2012

Kari Dolan, Manager  
Ecosystem Restoration Program  
Department of Environmental Conservation  
Watershed Management Division  
1 National Life Drive, Main 2  
Montpelier, VT 05620-3522

Dear Ms. Dolan,

The Vermont Association of Planning and Development Agencies (VAPDA) appreciates the opportunity to comment on the draft Water Quality Remediation, Implementation, and Funding Report prepared in accordance with Act 138.

Vermont's 11 Regional Planning Commissions help communities manage change and improve the quality of life for our citizens. We advocate for their needs to state and federal agencies, as well as help translate state and federal programs to community action.

VAPDA submits the following comments on the draft Report:

**Regional Planning Commissions (RPCs) can play a significant role in improving Vermont's water quality.**

VAPDA appreciates the draft Report's description of RPCs and ways we can, and do, assist in meeting water quality goals. VAPDA is working to develop statewide consistency among RPCs. All RPCs provide services to their respective municipalities on water quality planning and implementation as funding and regional priorities allow. The draft report's recommendation to amend 24 V.S.A to include a water quality element in regional plans would help better integrate state, regional and municipal priorities regarding water quality. VAPDA invites you to participate in one of its upcoming monthly meetings to discuss the Department's ideas for desirable common elements within regional plans.

**The draft Report would benefit from strengthening the link between the importance of maintaining Vermont's forests and maintaining and improving water quality.**

Forested watersheds are the generally accepted benchmark of quality for water resources, according to the Vermont Department of Forests, Parks, and Recreation website. The draft Report alludes to forest land conversion in several areas, including future development impacts,

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the importance of maintaining upstream portions of watersheds, enhancing the UVA program, and a need to address silviculture runoff. It would benefit from addressing the maintenance of Vermont's urban and rural forests as a crucial part of sustaining or improving water quality more directly in Chapter One. It may be helpful to incorporate some of the priority actions and issues of the 2010 Vermont Forest Action Plan into the final Report, as well as new strategies for developing forest sustainability being tested by the Vermont Division of Forests.

**Municipalities would benefit from understanding and technical assistance with both regulatory, and non-regulatory, tools for promoting, protecting, and improving water quality.**

Achieving 100 percent of Vermont municipalities having enhanced river corridor and floodplain bylaws by 2022 is a worthwhile goal that should be pursued with vigor. However, it may not be achievable given that citizens in some municipalities have not chosen to adopt basic flood hazard regulations as of 2012. Identifying non-regulatory tools for promoting, protecting, and improving water quality and providing technical assistance about these tools to municipalities can assist the State in meeting its water quality goals while educating citizens and municipal officials about other methods for achieving water quality.

**Managing the aging drinking water and sewer systems in Vermont continues to be a struggle for municipalities, and targeted investments to support maintenance of these systems would be welcome.**

Implementing the goals of 24 V.S.A. Chapter 117 §4302 related to compact village and urban centers and providing a strong and diverse economy requires adequate water and sewer in these areas. Having the Department highlight aging systems as a priority water quality issue affecting both human health and the environment will increase the understanding of their importance.

We appreciate the opportunity to provide input on the draft Report.

If you have any questions, please feel free to contact me.

Sincerely,



Charlie Baker, Chair  
Executive Directors Committee

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