



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION I
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BOSTON, MASSACHUSETTS 02109-3912

September 3, 2020

Julia S. Moore, Secretary
Vermont Agency of Natural Resources
1 National Life Drive, Davis Bldg.
Montpelier VT 05620-3901

Anson Tebbetts, Secretary
Vermont Agency of Agriculture, Food and Markets
116 State Street
Montpelier, VT 05620-2901

Peter Walke, Commissioner
Vermont Department of Environmental Conservation
1 National Life Drive, Davis Bldg.
Montpelier VT 05620-3520

Re: Lake Champlain TMDL Implementation Final Report Card for Phase 1 Milestones

Dear Secretary Moore, Secretary Tebbetts, and Commissioner Walke:

EPA committed to periodically evaluate Vermont's progress toward completion of its Lake Champlain Phosphorus TMDL Phase 1 implementation obligations. As you know, the 2016 TMDL includes an Accountability Framework containing 28 Phase 1 milestones to be completed by the end of 2017. EPA issued the State a provisional pass in April 2018 based on the successful completion of 25 of the 28 milestones and the State's commitment to complete the remaining three milestones the following year. **With its recent issuance of the Three-Acre Stormwater Permit, Vermont has successfully completed all Phase 1 Accountability Framework milestones.**

The completion of the Phase 1 milestones (as documented in the attachment) sets the wheels in motion for restoration of the Lake in the years to come. These milestones are key foundational building blocks, including, among other things, the adoption of new Required Agricultural Practices to reduce phosphorus from agricultural sources, the issuance of a series of new stormwater permits to reduce phosphorus from developed land, the establishment of a long-term

funding source for clean water projects across the state, and the development of a tracking and accounting system to evaluate phosphorus reduction progress across all sectors. Completion of these foundational milestones is a major accomplishment and EPA commends the State for its dedication to this work.

While the focus of this report card is on the Phase 1 milestones, we also want to acknowledge the results of the broader suite of Lake restoration actions completed since passage of Act 64. The State has indicated in its Vermont Clean Water Initiative 2019 Performance Report that actions tracked so far have resulted in an estimated reduction of 16.4 metric tons of phosphorus per year, or about eight percent of the total reduction target. As tracking methods are further developed and the impact of new permit programs and related measures is quantified, we anticipate that phosphorus loading will continue to decrease substantially over the next five years.

While much work remains, the State's successful completion of the 2016 TMDL's Phase 1 milestones puts Vermont in a strong position to achieve the phosphorus reductions needed to restore Lake Champlain.

Thank you again for the work involved in finishing your Phase 1 milestones, and we look forward to continuing to collaborate with you on Lake Champlain protection and restoration.

Sincerely,

Dennis Deziel
Regional Administrator

Attachment

Cc (via email): Pete LaFlamme, Watershed Management Division Director, VTDEC
Neil Kamman, Water Investment Division Director, VTDEC
Laura DiPietro, Water Quality Division Director, AAFM