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Kari Dolan
Manager, Ecosystem Restoration Program
Department of Environmental Conservation Watershed Management Division
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Montpelier, VT 05620-3522

Ms. Dolan,

Thanks to Vermont Department of Environmental Conservation and EPA Region 1 for recently conducting a series of public meetings to discuss the, "Draft Proposal for a Clean Lake Champlain" (tmdl).

- VRWA supports the ongoing efforts of direct discharge facilities to reduce phosphorus loads to Lake Champlain. It is important to note Vermont wastewater facilities (wwtf) are doing their part on this issue and these efforts represent a major success story. During the 1970's, wwtf made up nearly half of the total phosphorus load to Lake Champlain. As a result of significant capital investments since 1991, these same direct discharges have reduced their phosphorus loading to the lake by 83%; now estimated load is just above 3%.
- If additional reductions in phosphorus contributions from wwtf are incorporated into the final tmdl, there must be adequate funding support to cover the associated costs. The final phosphorus discharge limits are not yet determined but it is known a value below current limits will be very expensive to implement for a very small gain (estimated at 1 to 2% of total phosphorus load). Cost estimates for this minimal gain are into the hundreds of millions of dollars. Given increasingly tight budgets, for communities and the users of the given wwtf, it is not realistic to expect this cost can be readily absorbed at the local level by ratepayers.
- The detailed costs associated with all possible strategies to reduce phosphorus loading should be included in the final tmdl plan. This information needs to illustrate what the costs for any given strategy will be and also what that given investment will provide in regards to total benefit, in this case reduction in phosphorus loading. This information could then be used to target and prioritize investments (using a cost-benefit analysis). For each dollar invested it should be made clear which investments provide the most reduction in phosphorus loading.
- Consider allowing some type of trading or credit process in the final tmdl plan. A basic concept would allow a credit and or giving funding preference to partnering entities. As an example, at a recent biosolids meeting conducted by VT DEC (December 2013) several success stories were described regarding activities between wwtf and local farmers on biosolids disposal processes. The local farmers collaborated with their local wwtf to receive biosolids from the facility. These biosolids were then used as a fertilizer source and applied using VT Department of Agriculture best management practices. These efforts not only protected the environment but also benefited both the wwtf and the local farmers. This is a win – win partnership activity that needs to be expanded upon and further rewarded.

VRWA is prepared to continue to assist communities and to continue partnerships with state and federal partners with the overall goal of insuring systems have the resources needed to both promote public health and protect the environment. Again thanks for your efforts and for allowing VRWA the opportunity to provide feedback on this issue.

Sincerely,

A handwritten signature in black ink, appearing to read "Shaun Fielder".

Shaun Fielder
Executive Director