



January 21, 2014

Senator Robert Hartwell
Chair
Members of the Committee
Senate Natural Resources Committee
Vermont State House
Montpelier, Vermont 05

Dear Senators,

Our membership has been engaged and passionate about what the lake means to their businesses and families. Without a clean and inviting lake, the members of the Lake Champlain Regional Chamber of Commerce will not be able to realize the economic and personal benefits that they have enjoyed for generations. Our member businesses support reducing overall pollution in Lake Champlain.

As the Committee continues to work on H. 526, we ask that you consider the following:

1. Delegation of power should be an option to municipalities as often as possible. A "one size fits all" regulation will not work well on Lake Champlain's varied shoreline terrain. Towns with established shoreline regulations know what is best for their own nuances in shoreline geography. Shoreline regulations must be allowed to be administered on the local level with deference given to existing local regulations if desired by a community.
2. The proposed vegetation and ground cover requirements go too far and will be difficult to enforce. Regulating ground cover and all vegetation within the shoreland is too broad and will create a system of neighbor turning in neighbor. Regulating when and how a landowner can rake their leaves is unmanageable.
3. Allow adequate time for municipalities to adopt local shoreline zoning bylaws. All towns which desire to regulate their shorelines should be given a reasonable amount of time to set their own policies. More than one calendar year will be needed for towns to develop regulations and those regulations should be allowed to reflect local needs and planning.
4. Provide adequate lead time for landowners to understand the bill and its ramifications. Development projects undertaken by our members often involve the input of significant capital and the signing of agreements months, and even years, in advance of actual ground breaking activities. An effective date prior to January 2015 may negatively impact those landowners who have expended resources for projects prior to the existence of shoreland regulation. Adequate time will be needed so that landowners can make decisions on development projects based on their understanding of the new law.
5. Fees should be based on the size of the project. A fee structure that bases the price for a permit or registration on the size of the project more fairly distributes the cost of administering the program than a flat fee.
6. Opportunity for a variance should be included. While the current draft of H. 526 includes in-depth information on how the program would operate, we cannot imagine every situation

that may come up over time. Language that allows for variances should be included in the bill so that landowners with a unique property or plan can work with the Agency to find a solution.

The outpouring of Chamber members interested in water quality policy has shown us that those operating near Lake Champlain are truly stewards of the lake. They understand the need for their most prized asset to be the economic anchor and regional landmark we all know. It must be able to attract businesses, residents, and tourists moving forward. We appreciate the opportunity to offer these comments as the Committee looks to complete your work on H. 526.

Sincerely,

Tom Torti
President
Lake Champlain Regional Chamber of Commerce