



**Addendum to VLCT Letter dated February 9, 2015**

**Based on changes in Draft 1.3  
Vermont League of Cities and Towns  
Karen Horn, Director of Public Policy & Advocacy**

**February 13, 2015**

We urge the committee to leave intact 10 V.S.A. § 1266a (c).

*The Secretary of Natural Resources shall establish a schedule for municipalities that requires compliance with this section at a rate that corresponds to the rate at which funds are provided under subsection 1625(e) of this title. To the extent that funds are not provided to municipalities eligible under that subsection, municipal compliance with this section shall not be required.*

And 10 V.S.A. §1625(e)

*If the Department finds that a proposed municipal water pollution control project, is necessary to reduce effluent phosphorus concentration or mass loading to the level required in section 1266a of this title, the Department shall award to the municipality, subject to the availability of funds, a state assistance grant. Such grants shall be for 100 percent of the eligible project cost. This funding shall not be available for phosphorus removal projects where the effluent concentration must be reduced in order to maintain a previously permitted mass loading of phosphorus.*

In fact, if removing phosphorus from municipal wastewater treatment facilities is a state priority imposed by EPA, then the state needs to find the money to pay for

it. Wastewater treatment facilities clearly provide a service to the state as a whole and not only to their users. p. 96, 99.

There is no funding in this bill to pay for the millions of dollars of unfunded mandates. We understand the need to clean up the lake. We do not understand how the legislature can imagine that this can occur on the backs of the property tax payer.

VLCT supports a temporary increase in the gas tax at this time when gas prices are low. VLCT supports an impervious cover assessment or per parcel fee as long as it is collected by the state, which is the entity imposing it and as long as revenues pay for implementation projects. The Department of Taxes can do this.