October 26, 2015

Tabular Summary of Public Comments on the Fund Allocation Priorities for the Clean Water Fund Board

Public Comments	General	General - Funding	General - Process	Process - Transparency	Process - Regional Equity	Table #1 -Priorities	Table #2 - Allocations	Enforcement	Monitoring and Assessment	Education/Outreach, Technical Assistance
General Comments										
Process lacked adequate opportunity to provide input prior to releasing draft priorities			X							
Board meeting did not allow for engagement and the development of priorities			X							
Unclear how the allocations were determined				X						
Stakeholder input is critical to achieve improvements and build support			X							
Lack of transparency has hindered ability to provide substantive comments				X						
Fund is to be a dedicated fund for clean water projects, not to offset budget shortfalls		X								
Allocations that focus on programs rather than projects adds to the uncertainty				X						
Priorities should reflect the timeframe of commitments established in Act 64	X									
A website should be established containing information to explain priorities and allocations				X						
Extend the comment period after information regarding allocations is public			X							
Use a collaborative, sustained & statewide public engagement effort to promote a water ethic & show progress	X									
Seek stable funding from uses that generate impacts and from fines through enhanced enforcement		X						X		
Ensure that the Clean Water Fund provides for a statewide approach for water quality improvement		X	X							
Recommendations should be divided into transitional (to be phased out) & operational (continual) activities	X									
Identify all state & federal funding to a priority area to show resources already available to help justify proposal		X								
Provide information on the effect of each action to see which produces results (environmental outcomes)	X									
Volunteer organizations involved in fundraising, assessments, monitoring, raising awareness and cleanups can only do so much without funding		X					X			

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General Comments (continued)										
Remove all references specific to watersheds in Table 2; recommendation #1, #6, and #14 are earmarks. Table 1 priorities provide sufficient guidance to ensure highest quality projects receive funding						X	X			
Failure to regulate the import of phosphorus-containing fertilizer will frustrate efforts to restore water quality	X									
The least expensive option is to prevent impacts and treat the cause of pollution, rather than the results	X						X			
Best Management Practices are not practical, effectiveness is speculative, there is a lack of incentives to adopt them, there is a lag time before seeing results	X									
Clean Water Fund should not become a replacement for other funding programs but an addition over existing funding levels, in recognition of the water quality challenges		X								
General Comments - Geographic Specification										
Target the impaired waters of the Connecticut River; this watershed should be a priority	X				X					
Geographic equity is important; all waters should benefit with the enforcement of TMDLs					X					
Address erosion and water quality issues of the Connecticut River					X		X			
Conservation commissions and the Connecticut River Watershed Council need support to address problems					X		X			
Geographic equity is important for non-Lake Champlain projects					X					
Support high priority projects across the state, including the Connecticut River Valley watershed					X					
The Connecticut River watershed has the same water quality needs as Lake Champlain; support regional equity					X					
Make Lake Carmi, an impaired water, a state priority					X	X				
Support the Connecticut River watershed which is impaired for nitrogen and subject to a TMDL					X					

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General Comments – Compliance and Enforcement										
DEC should be properly funded to provide farm oversight and enforcement								X		
Agricultural impacts could be reduced by eliminating violations via an enforcement (rather than grants) program								X		
Connecticut River buffers are often narrow or non-existent, best practices are not being followed, runoff is causing environmental & health impacts								X		
Increase enforcement using frequent inspections & increase other regulatory activities to increase compliance								X		
Best Management Practices should be required								X		
Concerned that the State has a poor record of enforcing existing vegetated buffer requirements								X		
Table #1: Clean Water Fund Priorities										
Add to Priority C (riparian buffer restoration) "to minimize the risk of flood damage"						X				
Target Vermont's impaired waters						X				
Support Priority C (riparian buffer restoration) and G (land acquisition) as the least expensive way to restore water quality, flood resilience & improved fish & wildlife habitat						X				

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Table #2: Agency of Agriculture (Recommendations #1-#3)										
Increase allocations for conservation planning & technical assistance, necessary for implementation							X			X
Support conservation districts in their work to provide technical and educational assistance							X			X
Establish a grant fund to assist farmers in meeting cost-share requirements of state & federal programs		X								
Develop guidelines for technical assistance providers for managing referrals to local, state or fed. programs										X
Promote grass-based dairying statewide as a value-added, lower impact opportunity							X			
Providing incentives & funding assistance to farmers to implement Best Management Practices is essential		X					X			
Farming in watersheds with impaired waters such as Lake Carmi must be held to a higher standard								X		
Support allocation to purchase conservation easements and curtail agricultural activity in impaired waters							X			
Support technologies to enhance implementation of agricultural best management practices							X			
Eliminate language, “Lake Champlain as first priority” and focus on highest ranking projects statewide							X			
Table #2: All Sectors (Recommendations #4, #5)										
Support partner support (recommendation #4)							X			X
Include in partner support (rec. #4) assistance in project development to meet need of rural communities							X			X
Support partner monitoring (recommendation #5)							X		X	
Support partner monitoring (recommendation #5) to identify, track stream conditions over time							X		X	
Provide $10,000 to the Lewis Creek Association to target and track water quality investments							X		X	
Support a statewide volunteer stream monitoring and sampling planning initiative							X		X	

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Table #2: Agency of Natural Resources – Municipal Stormwater (Recommendations #7-#9)										
Support stormwater project planning and implementation (recommendations #7, #8)							X			
Increase stormwater project planning for FY2017 (recommendation #7) to maintain funding levels							X			
Do not support municipal capital equipment assistance (recommendation #9), since this is to meet urban needs, which should already have contracted these services or secured equipment; rural communities under-resourced							X			
Table #2: Agency of Natural Resources – Natural Resources (Recommendations #10-#12)										
Support wetland, river and floodplain restoration (recommendations #10-#12)							X			
River and riparian restoration (recommendation #11) should not be applied to VT Housing & Conservation Board (VHCB)-supported projects in recognition of existing state funds being used to support VHCB							X			
Support actions that provide for flood mitigation as well as water quality, such as easements & land acquisition							X			
Request $20,000 in 2015/2016 winter season to support survey and engineering work associated with moving a dam on Lake Harvey in the town of Barnet further upstream to reduce accumulation of silt							X			
Recommend highest priority on retiring entire floodplains to restore floodplain forests & wetlands, targeting lands subject to repeated flooding and repetitive crop loss							X			
Support floodplain restoration over buffers; buffers have limited benefits such as filtering pollutants							X			
Recommend that wetland and floodplain restoration (recommendation #10) & river corridor restoration (#11) receive FY2016 funding							X			

Public Comments

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Table #2: Agency of Natural Resources – LiDAR Mapping (Recommendations #13)										
Support LiDAR mapping							X			
Table #2: Agency of Natural Resources – Wastewater Treatment (Recommendations #14)										
Eliminate this allocation; source is 3% of the problem and contribution is meaningless to meet $78 million in need in Lake Champlain Basin and other funding streams are available, including user fees							X			
Remove earmark to the Lake Champlain Basin; EPA requires nitrogen reduction plans as part of all discharge permits in the Connecticut River watershed							X			
Table #2: Agency of Transportation – Municipal Roads (Recommendations #15-#16)										
Support municipal gravel & paved road planning & implementation							X			
Modify proposal to support inventory & prioritization for the first two years & implementation in later years							X			
Note the Hazard Mitigation Grant Program funds as another leveraged fund to support this work	X									
Support $500,000 for FY2017 to support regional planning commissions assistance to municipalities							X			X