



February 11, 2015

Chairman Deen and Committee Members
House Fish & Wildlife Committee
State House

Dear Chairman Deen,

The Lake Champlain Regional Chamber of Commerce (LCRCC) appreciates the previous opportunities we have had to testify on water quality improvement, and specifically on H. 35. In the past, we have raised concerns about the mechanism proposed for raising money for the Vermont Clean Water Fund and about how money in the fund will be spent. We testified previously that we want the money raised to go, as much as possible, directly to projects on the ground and as little as possible to the creation of more government positions.

While a specific funding mechanism for the Vermont Clean Water Fund is not currently included in the bill, the newest version does include new and increased fees focused specifically on the water quality initiative, totaling approximately \$1.5 million, to pay for thirteen new positions within the Department of Environmental Conservation (DEC). Section 29 (page 82 of 103, Draft 1.3) of H. 35 propose increases or imposes new DEC fees, with some fees increased by more than 200 or 300 percent. LCRCC continues to have concerns about the significant amount of money being raised through these fees, largely from businesses, to pay for additional staffing.

DEC has provided the Committee and LCRCC a breakdown of each new position for which these fees would be used. While we continue to encourage DEC to look for efficiencies that would allow them to reduce the number of new positions necessary, we recognize that certain positions, such as permit writers, cannot be performed by an entity outside DEC. However, some positions would seem to lend themselves toward contracting with an external organization. For instance, DEC's memo on new positions indicates the need for two new staff members to perform monitoring, assessment, and planning. Specifically their memo outlines, "The Phase I TMDL Plan requires a watershed modeler to conduct geographic and technical source-sector analyses using a critical source area identification system. The results of this modeling will direct implementation in the form of regulatory permitting actions, funding to prioritized target watersheds, and targeted pollution controls." This type of monitoring and analysis could be performed by an external body, such as a private environmental consulting organization or one of the many non-profits focused on water quality and/or conservation. By contracting the service out, DEC would likely reduce costs and would not have an obligation to maintain a staff person once necessary monitoring or analysis was completed.

Again, while we are not intimately familiar with DEC staffing, we ask the committee to explore any opportunities for efficiencies and external contracts in order to ensure that funds raised here and in the future are put, as much as possible, into measures that will have a lasting impact of the health of the lake.

Thank you,

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