

**Testimony on 2 Acre Permit  
Conservation Law Foundation  
January 3, 2018**

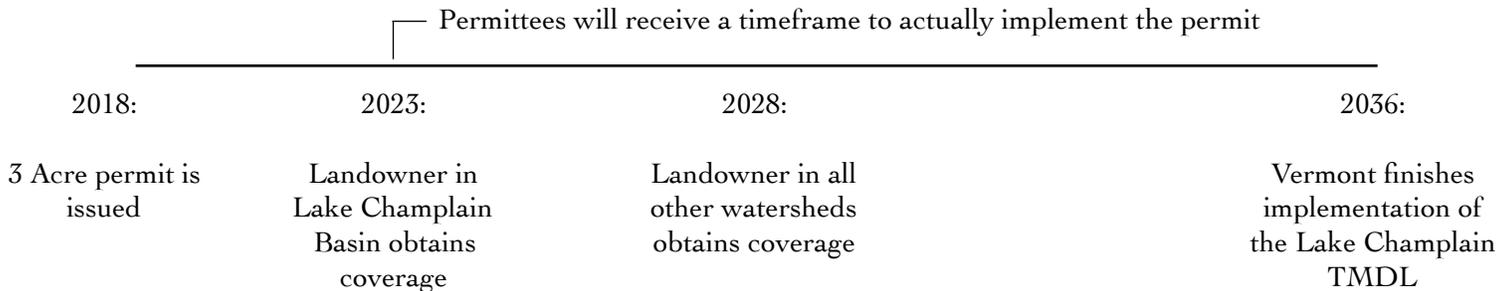
CLF opposes all proposed changes to the 3 acre permit.

**1. Act 64 provides a generous timeframe to develop and implement the 3 acre permit.**

No one is expecting landowners to implement this permit overnight. There is a well-conceived plan of attack. Let's give it a chance to succeed before changing it upfront.

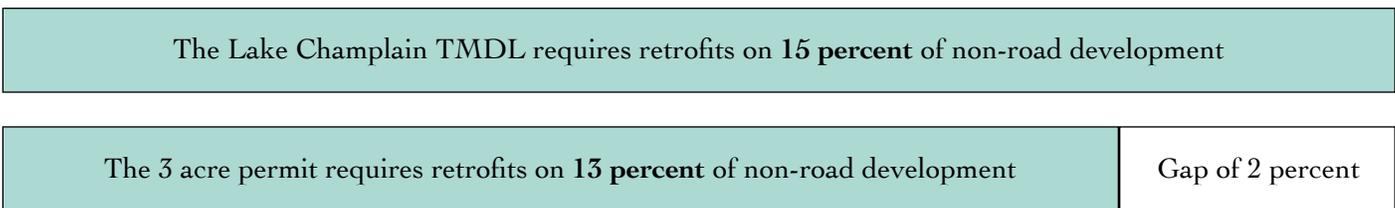
Up until two months ago, the trains were running on time. We were receiving regular communications from the Stormwater Program, letting us know that they have written a draft permit and when to expect the comment period. Again, CLF is asking this Committee to allow our well-laid plan a chance at success.

Act 64 Timeline



**2. The 3 acre permit is foundational to the success of the Lake Champlain TMDL.**

The Lake Champlain TMDL requires retrofits on 15 percent of non-road development. The 3 acre permit requires retrofits on 13 percent of non-road development. Even with this crucial permit, there is still a gap and the State will still need to do more.



**3. The State is helping with the costs.**

Thanks to the work of this Committee as well as your colleagues, clean water received an additional \$35.9 million in fiscal year 2018. This money should be directed to any schools, town buildings, or state buildings impacted by this permit.

**4. If you pull back on this critical permit, the entire clean water plan falls apart.**

To reach our goal of clean water, we need to stick to the plan. We cannot afford to change course each year. Let's uphold our commitments, and move forward with a comment period for the draft 3 acre permit.