

February 1, 2018

Dear House Committee on Natural Resources, Fish, and Wildlife,

As organizations dedicated to swimmable, fishable, drinkable water for all Vermonters, we worked hard on the Vermont Clean Water Act in 2015. We support efforts to strengthen and successfully implement and fund it, and we oppose any rollbacks to that landmark legislation.

Unfortunately, the latest draft of H.576 continues to include provisions that undermine Act 64's intention to have all three-acre sites in Vermont undergo stormwater improvements so we can both reduce pollution in impaired waterways and ensure our currently clean waters remain that way. We support implementation of the long-overdue anti-degradation rule. We do not support any provisions that would tie stormwater requirements to specific pollutants, TMDLs, impaired water designations, or wasteload allocations.

We do, however, support moving the three-acre stormwater permit requirement for Lake Memphremagog to 2023, and including a new requirement for half-acre stormwater retrofit and new construction permit requirements. Act 64 envisioned that we would have both half-acre stormwater requirements for new sites and retrofit sites, along with three-acre stormwater requirements for legacy sites.

Given the urgency of cleaning up polluted Vermont waters, and maintaining the clean water where we're fortunate to still have it, we strongly urge the committee to oppose any rollbacks to Act 64, and support strengthening our water regulations by adding a half-acre requirement and maintaining or moving up the dates for permit requirements in Act 64.

Thank you for your consideration.

Sincerely,

Lauren Hierl
Vermont Conservation Voters

Jon Groveman
Vermont Natural Resources Council

Lori Fisher
Lake Champlain Committee

James Ehlers
Lake Champlain International

Robb Kidd
Sierra Club – Vermont Chapter