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**Sent:** Thursday, April 25, 2019 7:50 AM

**To:** Amy Sheldon <ASheldon@leg.state.vt.us>; Paul Lefebvre <PLefebvre@leg.state.vt.us>; Trevor Squirrell <TSquirrell@leg.state.vt.us>; Chris Bates <CBates@leg.state.vt.us>; Kari Dolan <KDolan@leg.state.vt.us>; jmcullough@leg.state.vt.us; Leland Morgan <LMorgan@leg.state.vt.us>; Carol Ode <COde@leg.state.vt.us>; Harvey Smith <HSmith@leg.state.vt.us>; Thomas Terenzini <TTerenzini@leg.state.vt.us>

**Cc:** Laura Bozarth <LBozarth@leg.state.vt.us>; Kerry O'Brien <kerry.obrien@vt.nacdnet.net>

**Subject:** S.96 - Clean Water for Some but not All?

Dear Chair Sheldon and members of the House Natural Resources, Fish and Wildlife Committee,

Thank you for your work to improve S.96, the administration's proposal to reorient clean water funding to focus on phosphorus reduction in the Lake Champlain and Lake Memphremagog Basins and to outsource a significant portion of clean water fund management through regional "clean water service providers."

This concept was developed - with minimal dialogue with clean water project implementers working on the ground - to provide "reasonable assurances" to EPA that Vermont will be able to meet the current Lake Champlain TMDL requirements.

As we have testified, Conservation Districts are concerned that the proposed restructuring will add an **inefficient and costly layer of bureaucracy** to clean water project development and implementation, and undermine successful centrally-managed grant programs that have been developed in partnership with the VT Department of Environmental Conservation.

We also remain concerned about the significant **funding reductions** that would result from this model for important water quality projects that address anti-degradation, flood resilience, habitat restoration, ecosystem services and other co-benefits throughout the state and **particularly in the Connecticut River and Hudson River Basins.**

The administration's proposal **poses significant risk for the State of Vermont**, since it is untried. It would be unwise to put so many eggs in this experimental clean water pollutant reduction program basket. In the current version of the bill, only the Water Quality Enhancement Grant Program is funded to support a wider range of clean water projects throughout the state, consistent with the "All In" intent of Vermont's Clean Water Act. Increasing the proportion of funding in this program will help the state manage the risk associated with the administration's new concept.

For the reasons outlined above, we urge you to **retain or increase the 25% funding level for the Water Quality Enhancement Grant Program** before voting S.96 out of committee.

Thank you for your consideration.

Sincerely,

Jill Arace, Executive Director, Vermont Association of Conservation Districts  
Kerry O'Brien, Administrator, Natural Resources Conservation Council

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