



April 4, 2025

Senate Committee on Natural Resources and Environment  
115 State Street  
Montpelier, VT 05633

Re: H. 481

Dear Committee Members,

Thank you for the opportunity to meet with you on Tuesday, April 1. As a follow up, I would like to provide you with the following summary. GMWEA is available at your request for further discussion on this matter should you have any additional questions.

**Section 1:** Impact Fees- typically, municipalities subject to an MS4 permit establish a Stormwater Utility Fee. Will those Utility Fees still be permitted under this rule? If not, this could result in the unintended defunding of Stormwater Utilities.

Suggest removing “Impact” from “Impact Fee” to avoid confusion with other municipal planning and development processes.

Support extending the timeline from October 1, 2023 to 2028.

**Section 2:** Support repealing the sunset of the PTT for Clean Water Surcharge.

**Section 3:** At minimum, an extension of the 0.22 percent beyond 2027 should be considered.

**Section 4:** Support the proposed strike “allocating clean water surcharge revenue to Vermont Housing and Conservation Trust Fund.”

**Section 6:** Support removing the requirement for grant or financing programs contingent on meeting annual goals. Meeting these goals is often dependent on property owner participation which is outside the Service Providers’ control.

Support the proposed addition of language “for a permit renewal...”

DO NOT SUPPORT the proposed addition requiring municipalities to take full legal responsibility for the stormwater system as a condition of grant funding.

**Section 9:** Support the addition of the term “median”.

**Section 10:** Support.



**Proposed Amendment:**

10 V.S.A § 1264 (a)(2) The General Assembly intends, by enactment of this section, to

(C) Limit a property owner to be subjected to not more than one (1) Stormwater Discharge Permit on a single parcel of land at any given time.

1. Where the parcel of land is, or becomes, a Municipal Road and is, or becomes, subject to an MS4 or MRGP permit, the permitting of that road may, at the discretion of the municipality, fall under the MS4 or MRGP permit.

2. When a public road is within, or drains too, a private development subject to a stormwater permit, the municipality shall not be required to be an applicant on the Stormwater Discharge Permit.

This revision would allow municipalities to **retain autonomy in negotiations** and **provide support to private stormwater system operators** without assuming unnecessary liabilities.

Sincerely,

*Christine Dougherty*

Christine Dougherty  
President  
Green Mountain Water and Environment Association  
christine.dougherty@gmwea.org