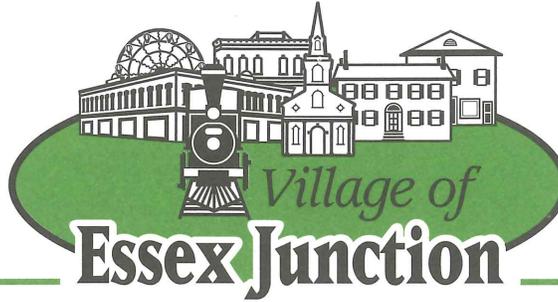


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February 10, 2015

Senator Christopher Bray
Senate Committee on Natural Resources and Energy.
Representative David L Deen
House Committee on Fish, Wildlife & Natural Resources

S.46 and H.29 Quality Improvement Fund

Thank you for the opportunity to comment on this pending legislation for the Water Quality Improvement Fund. The Essex and Essex Junction community has actively participated in the Lake Champlain cleanup over decades. Our work has included centralized sewage treatment with phosphorus removal as well as early stormwater management through MS4 (Municipal Separate Storm Sewer System) permit compliance.

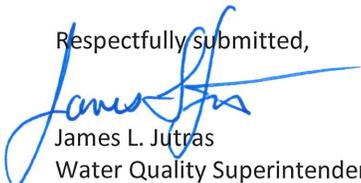
The availability of implementation or Capital Account funds of funds can be hampered if Administration costs for the program run high. This concern has been expressed by many MS4 communities over the past years. Please consider a percentage cap to the administrative costs allowed under these bills.

Sec 1. VSA 1263 € WATER QUALITY IMPROVEMENT FUND Our community supports the prioritization and disbursement of funds based on phosphorus and sediment reduction. The priorities presented in the bill are sound but must be flexible in the implementation in order to expedite improvement to Lake Champlain.

We firmly support funding that generates the largest reduction in Phosphorus per dollar invested in some metric that considers the biggest return on investment. Without careful prioritization of investment, EPA has promised to revisit existing NPDES permits where it is widely recognized that costs for additional Phosphorus removal is at a level of diminishing return. To clarify other eligibility criteria, please consider a change within section (c) Capital Account (2) (A) deleting "~~...municipalities with an established stormwater district, stormwater utility, or some other similar mechanism for the regulation of stormwater.~~" If the intent is to prioritize funds to the MS4 communities, please consider "~~...municipalities that operate under MS4 permit since 2013.~~"

Thank you in advance for your consideration of these comments.

Respectfully submitted,



James L. Jutras
Water Quality Superintendent

cc: Village of Essex Junction Board of Trustees
Patrick C. Scheidel, Municipal Manager