

S.49 Comments

James Ehlers – February 17, 2015

<u>Page</u>	<u>Line</u>	<u>Comment</u>
1	18	and improve . . . <u>and exceed</u> ?
2	1	cost effective by whose measure?
	3	replace “more” with “all”?
	13	replace “the amount of” with “all”
	20	equine?
3	4/5	field creation and maintenance
	9	“cost effective” – by what standard?
	13	replace “may” with “shall” – when AAPs not protecting WQS
	17	Delete “When requiring implementation of a BMP”
	19/20	by what standard?
6	7	January 1?
	12/13	schedule F -- income threshold
	14	“Require <u>all farms</u> ” – strike “subject to the accepted agricultural practices”
7	14	converted wetlands?
8	9/10	water testing
	15	eliminating harmful contributions
	19	change date to July 1, 2016
9	9/10	to include testing of outfalls during rain events spring and fall
10	4	replace “may” with “shall” – add “s” to farm – minimum #/percentage
	8/9	replace “may” with “shall” – GAP watersheds
12	8	notification
15	7	replace “may” with “shall”
16	11	criminal
18	19/20	treble damages if found due negligence
27	2	“authorized by the Secretary” -- ?
	5	“protective measure” -- ?
28	12	divisive?
	12	nonprofit parcels stormwater -- ?
33	8/9	<u>EXCELLENT</u>
	10	January 1, 2016?
57	14	½ acre

58	2 15/16	½ acre demonstrate financial capacity to maintain capital reserve
67	5 5	Use of existing mechanisms – bond bank/Yankee credit/VT Community Foundation Oversight maintained by Legislature
68	12	Municipal officials? UTG; League
71	4	Require # projects or % projects – VHCB/Agency of Commerce
76	7/8	Compost? Chicken manure?
78	9	What if they discharge to public waters?
79	16	replace date with January 1, 2017

General Observations

- Rural Heritage Tax
- Address of communities with recurring CSO events
- Requirement to show plan to eliminate future events
- Pathogens/neuro and liver toxins
- Dry toilet technology
- Remediation
- Compensation for past damages
- Spreading of septage/whey ban (sunset). If not, then required public notification
- Phase out landfilling of sludge – require digestion and extraction of nutrients
- Mandatory cover cropping
- Agency must present plan to meet numerical limits by year end
- Mandatory sampling “at the pipe”
- Sunset on broadcast spreading of liquid manure by 20XX
- Mandatory injection
- Wetland reclamation program
- NYS EEO model