



Date: 4-28-15

To: Razelle Hoffman, VPAC

Fr: Marty Illick, Lewis Creek Association (LCA)

RE: 4-28-15 VPAC mtg. public comment agenda item –Recommendations for the Pesticide/Herbicide permit review process and relationship to the Vermont Tactical Basin Plan Program

CC: Sylvia Knight, Neil Kamman, Rick Levy, David Mears

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We understand AAFM/VPAC meetings are challenging, at best, for participation by public and local watershed stewards who help oversee the health and qualities of wildlife, soil and water resources for public benefit.

With the increased importance of Vermont's Tactical Basin Planning Program, and imminent new soil and water policy, management and planning standards; we suggest now is an opportune time for AAFM/VPAC related information to be linked to and included into basin planning. This could provide societal and financial benefits by increasing public involvement and awareness of the AAFM/VPAC permit information and expediting improvement measures.

By adopting a watershed based management approach

A. Permits could be noticed and assessed by watershed with a more strategic group of informed stakeholders,

B. VPAC could record, monitor and interpret toxin impacts over time by watershed to understand cumulative impacts;

C. We could then recognize opportunities to mitigate and prevent wildlife, water and soil quality degradation in a more timely and cost effective fashion;

D. We would then be positioned to potentially reduce the use of pesticides and herbicides in Vermont in a more timely fashion and cost effective fashion.

Further, with the increased function of and more frequent reliance on Vermont Tactical Basin Plans, we suggest that VPAC toxins permit data and oversight be organized in concert with update cycles of the Tactical Basin Plans. VPAC meeting permit reviews and records can now be organized within a watershed framework by using the VT ANR Atlas platform. VPAC meetings could show the online atlas watershed maps with agendas that are organized by watershed and show meeting attendees where permits are sought, potential watershed impacts, and the documented quality conditions and concerns (wildlife, water, soils etc) within each subject watershed.

Thank you for the opportunity to comment.