

# HOW VPAC MIGHT INTEGRATE PERMIT ACTIVITIES WITH WATERSHED PLANNING

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Vermont is poised at a pivotal or "watershed" moment in regard to planning for the protection of waters needed for all life, for all generations. As a lay volunteer I offer these suggestions as one who can observe from outside with a view of the whole, see relationships, and urge you to embrace the important part you have in this crucial work.

## VT Watershed Management Planning Chapter 4:

Identify basin-specific stressors

Monitoring / assessment activities > scientific basis for decision-making

Outreach to large network of stakeholders

**Federal water planning law (40 CFR 130) directs agencies to**  
Focus on priority issues and geographic areas.

Identify priority point and nonpoint water quality problems.

## Roles/ responsibility for VPAC:

- 1) Provide GIS map of named streams and watersheds to permittees or direct them to appropriate website.
- 2) Stipulate that next year permittees will be expected to identify *all streams & watersheds* impacted by utility use adjacent to water, and RR or VTrans use from bridges, crossing or parallel herbicide applications close to water.
- 3) Restrict use of glyphosate beginning in 2015 near water because of P loading.
- 4) Suggest areas impacted by multiple permits associated with watershed priorities for monitoring, or seek guidance from watershed planners.
- 5) Report any problems with compliance to watershed planners through DEC watershed representative.
- 6) Share permit and other activity under VPAC discussion with planners in newsletters, emails or meetings.
- 7) Explain P problem with glyphosate.
- 8) Appeal to permittees for cooperation with watershed awareness and responsibility at crucial moment in watershed protection.
- 9) See 1, 2, 3, 4 above.
- 10) Indicate time-line for addressing substations as both point-source (underground drains) and non-point sources of herbicide pollution.

Consider alternatives; recommend control solutions.

11) Reinstigate RR Integrated Veg Management Plan, integrated into ROW pesticide regs.

12) Communicate to Mycologic Inc. and EPA the need for Chontrol Peet Paste as alternative to glyphosate and other herbicides for cut stump control.

**VWQS § 1-02.D. requires basin plans to**

Inventory existing and potential causes and sources of pollution that may impair waters.

13) See 4 above.

Establish strategy to improve/ restore waters, with full support of uses.

14) See 1, 2, 3 ,4, 5, 9 above.

Identify strategies, where necessary, by which to allocate levels of pollution between various sources as well as between individual discharges.

15) Develop policy for situations where multiple permits affect a given stream: limit herbicides; eliminate glyphosate to reduce phosphorus availability. Example: Both VELCO and VT RR cross the same streams in Chittenden and Addison Counties, so the year that VELCO treats a given section in that corridor, someone has to reduce herbicides and use alternatives.

Sources:

[http://www.vtwaterquality.org/wqd\\_mgtplan/swms\\_ch4.htm](http://www.vtwaterquality.org/wqd_mgtplan/swms_ch4.htm)  
Watershed Management Planning Chapter 4

[http://www.vtwaterquality.org/wqd\\_mgtplan/swms\\_ch4.htm#toc617](http://www.vtwaterquality.org/wqd_mgtplan/swms_ch4.htm#toc617)

Federal water planning law (40 CFR 130), in part, directs state agencies to

~prepare basin plans,

~focus on priority issues and geographic areas,

~identify priority point and nonpoint water quality problems,

~consider alternatives and recommend control solutions and funding sources.

VWQS § 1-02.D. requires basin plans to

~Inventory the existing and potential causes and sources of pollution that may impair waters

~Establish a strategy to improve or restore waters and to ensure full support of uses

~Identify strategies, where necessary, by which to allocate levels of pollution between various sources as well as between individual discharges

Concerning glyphosate in items 3,7,15 see "PHOSPHORUS & GLYPHOSATE: THE CASE FOR SIGNIFICANT REDUCTION" at <https://outside.vermont.gov/agency/agriculture/vpac/Shared%20Documents/Glyphosate%202015/TMDLglyphosate032315.pdf>