

# VERMONT LAW SCHOOL

Environmental and Natural Resources Law Clinic

March 3, 2010

Lisa Jackson  
Administrator  
United States Environmental Protection Agency  
Ariel Rios Building  
1200 Pennsylvania Avenue, N.W.  
Washington, D.C. 20460

Curt Spalding  
Regional Administrator  
USEPA Region 1  
5 Post Office Square, Suite 100  
Boston, Massachusetts 02109-3912

VIA UNITED STATES POSTAL SERVICE

**Re: Commencing Vermont NPDES Withdrawal Proceedings Pursuant to  
40 C.F.R. § 123.64(b)**

Dear Administrator Jackson and Regional Administrator Spalding:

Conservation Law Foundation (CLF) requests that the United States Environmental Protection Agency (EPA) order the commencement of National Pollutant Discharge Elimination System (NPDES) withdrawal proceedings in the State of Vermont without further delay. Through its de-delegation petition filed on August 14, 2008, subsequent filings, and numerous substantive meetings with EPA and the Vermont Agency of Natural Resources (ANR), CLF has demonstrated that formal withdrawal proceedings are warranted and necessary.

Sincerely,



David K. Mears, Director, Environmental & Natural Resources Law Clinic  
For Conservation Law Foundation

Cc: Jonathan Wood, Secretary, Vermont Agency of Natural Resources  
EPA/CLF/ANR Working Group (electronic mail only)