



Date: November 1, 2016 **DRAFT DRAFT**
To: Kevin Burke, State Stormwater Program, VTDEC via email: kevin.burke@vermont.gov
From: Dan Albrecht, Senior Planner
Re: COMMENTS ON DRAFT 2017 VERMONT STATE STORMWATER MANUAL

At its meeting this morning, Clean Water Advisory Committee (CWAC) of the CCRPC approved submission of the following comments on the draft *2017 Vermont State Stormwater Manual*.

In general, we support the updated manual and the increase in water quality standards and we applaud the Department of Environmental Conservation for consulting with numerous stakeholders in doing so. That being said, we offer the following comments and suggestions for improvements to the *Manual*.

- The term “designer” needs to be more adequately defined including what qualifications, if any, are required for municipal officials to act as a designer on their own facilities.

Tom says: delete this sentence

James suggests: “The CWAC recognizes the important role stormwater designers have with regards to STP design and ongoing inspection efforts. Knowing this, the CWAC encourages the State to implement a “Designer Certification” program as part of the Manual Upgrade similar to that of the States Wastewater program.”

- While the municipal representatives for the CWAC may disagree on the nuances of increased P control, further clarification of the Tiered system is required in the following areas;
 - Define “infeasibility” for Tier 1 and Tier 2 projects.
 - Define “feasibility” for individual STPs
 - It appears feasibility and design criteria for lined systems are assumed to be the same as that of un-lined systems. These should be broken out and treated separately.
 - What scenario/argument would allow a designer to choose a Tier 3 lined dry swale as opposed to a Tier 2 lined bioretention?
 - What scenario/argument would allow a designer to utilize a Tier 3 wet pond?
- Wet Ponds should have their design updated to achieve improved phosphorus removal.
 - For example, the wet pond design could be required to route the first inch of rain to a lined bio-retention before it heads to the main pond body. Flows larger than this could bypass the bio-retention and go straight to a forebay as they do now. As long as the “first flush” goes to bio-retention.
- The state should provide a clear link between the Vermont manual and the cited sources for the removal efficiencies of each Tiered practice.