

Date: March 28, 2018

To: Karen Bates, Watershed Coordinator, Vermont DEC
From: Dan Albrecht, Senior Planner
CC: CCRPC Clean Water Advisory Committee

**Re: Initial comment: Municipal and Regional priorities, Chittenden County
Pending 2018 Winooski Tactical Basin Plan**

Karen:

Thank you for this opportunity to provide some initial comments on municipal and regional priorities for the Chittenden County portion of the pending 2018 Winooski Tactical Basin Plan.

CCRPC staff and our Clean Water Advisory Committee as well as individual municipalities will provide more formal comments on these priorities after review of the anticipated April 2018 “pre-draft” TBP.

Over the past several weeks, through compilation of data from various sources (an analysis of municipal zoning regulations and plans, a questionnaire on water quality concerns distributed to municipal staff and discussions at meetings of our Clean Water Advisory Committee), I can offer the following:

There are eight Municipalities in the lower Winooski that are subject to a Municipal Separate Storm Sewer System (MS4) permit.

Burlington	Colchester	Essex	Essex Junction
Shelburne	South Burlington	Williston	Winooski

For these eight communities, the clear priorities for them are:

- Implementation of Flow Restoration Plans [there are 280+ projects identified]
- Development & Implementation of Phosphorus Control Plans.

Some additional concerns were also identified via questionnaire (I will send you the details of their responses under separate cover).

--Burlington: lake highly valued as well as conserved areas especially WVPD-managed areas and areas popular for boating and fishing along lake and river. Cyanobacteria outbreaks at discrete locations

--Colchester: Winooski River highly valued; concern over agricultural runoff and streambank erosion

--Shelburne: Shelburne Pond and its environs are highly valued. Concern over agricultural runoff into same. Concern over use of road salt and urbanization/conversion of former agricultural lands.

--Winooski: Gilbrook Pond and Casavant Park are two recreational areas that are highly valued however there is not much development pressure on these areas.

--Essex: several scenic/recreational areas were identified as important to the Town including an unnamed tributary (former water resource area) in Saxon Hill Forest, Woodside Natural Area, Hydro dam/Overlook Park at VT2-A crossing, views of Winooski River along VT Route 117 and Alder Brook & a community natural area for Meadow's Edge Subdivision at Chapin Road and Towers Road. Areas of concern identified included mass failures & severe erosion along Alder Brook within Mathieu Town Forest, Winooski River flooding along North Williston Road and development/encroachment & channelization on an unnamed tributary to Alder Brook east of Brigham Hill Road.

There are five non-MS4 Municipalities with significant land area in Basin

Bolton Buels Gore Jericho Richmond Saint George

As you know we organized two public meetings targeted at participants from these communities, one in Richmond on 6/26/17 and one in Huntington on 10/3/17. Three areas of priority that emerged from these meetings were

- Implementation of Road Stormwater Management Plan for MRGP
- Addressing runoff from private roads & private driveways
- How to enable appropriate investment/development in denser village areas while maintaining water quality

Additional concerns were also identified via questionnaire prior to the public meetings

--The Huntington River, Huntington Gorge and Gillet Pond were noted as areas of high value. -- There remains a concern over potential water quality degradation (from *e. coli*) in the Huntington River due to failing septic systems in the Huntington village area.

--Highly valued areas in Bolton were Bolton Pot Holes, Joiner Brook, Preston Brook, the Winooski River and Preston Pond.

--Areas of concern in Bolton were: Winooski River-inundation flooding; all mountain streams for flash flooding and pollution (turbidity, algae, agricultural runoff, smell, etc.) in the Winooski River.

Additionally, the Town of Bolton has expressed an interest in more studies regarding potential landslides.

Lastly, both the Town of Jericho completed a Stormwater Master Plan in 2016 and Richmond's SWMP will be finished in early summer 2018. Appropriate top-ranked projects in these Plans should be considered a municipal priority.

There are three Non-MS4 Municipalities with very minor land area in Basin

Hinesburg Underhill Westford

Like their counterparts, their most pressing concerns vis-à-vis the Winooski basin is implementation of the Roads Stormwater Management Plan of the MRGP.

With regard to Regional Priorities, at this time, we would reiterate our previous comments submitted in December regarding the 2017 (Phase II TMDL) update to the Northern Lake Champlain Direct-to-Lake. These read in part:

- *CRPCC recommends that more funding be allocated toward project development at this early stage so that in subsequent years it will be easier to determine which projects reduce the most phosphorus per dollar. Development of projects in Critical Source Areas for phosphorus loading should receive priority.*
- *In general, CCRPC recommends that for project implementation, priority be given to those projects that reduce the most phosphorus per dollar spent regardless of permit requirements.*
- *Additional weight should be given to projects located in Critical Source Areas as well as to projects that provide co-benefits such as other TMDLs (i.e. Flow Restoration Plans, E.coli, mercury, etc.) hazard mitigation, transportation improvement, aquatic organism passage, and/or listed in municipal comprehensive plans and capital plans.*
- *CCRPC recommends that the State provide mechanisms (such as via phosphorus credit trading) for municipalities and other property owners with permits to invest in Natural Resource sector phosphorus reduction would clearly provide for much more phosphorus reduction per dollar spent. Trading across municipalities should also be promoted.*
- *We also recommend that the State continue its analysis on how to foster credit trading between municipalities and the agricultural sector.*

Note however that as the development of the Winooski TBP moves forward, our recommendations on prioritization may change.

Thank you for this opportunity to provide these initial comments. The CCRPC staff and the Clean Water Advisory Committee look forward to continued work with you during the development of the 2018 Winooski Tactical Basin Plan.