



Date: April 27, 2018
To: CCRPC Clean Water Advisory Committee
From: Dan Albrecht, Senior Planner
Re: Initial analysis of April 2018 working draft of Winooski Tactical Basin Plan

The following comments highlight some of the key issues in this draft that CWAC members may wish to focus on during their May 1st meeting.

1. The Plan is very comprehensive but there is some confusion due to the overlap between objectives, strategies and actions.
2. Overall, the document has excellent details on stressors to water quality and other identified needs, but lacks sufficient details on, or a process to identify, which projects should be a priority during the 5-year timeframe of the Plan.
3. The Executive Summary lists eleven “Top Objectives and Strategies.” This list could also be separated out into two different lists: one that prioritizes physical water quality improvement projects and another that prioritizes research projects.
4. Page 2, in 3rd complete paragraph, there is an excellent reference to the role of RPCs as well as good language regarding the relationship between the Tactical Basin Plans (TBPs) and municipal and regional plans.
5. Page 3, it states “(t)he Tactical Basin Plan actions are described in Chapter 5’s implementation table summary and the Watershed Projects Database and will be addressed over the five-year life of the Winooski Basin Tactical Basin Plan.” Similarly, on page 132 the Plan states “(i)t is envisioned that the action items currently in the database as of the signing of the plan will be accomplished within the next five years as resources allow.” This seems a bit ambitious to say that projects in both the implementation table and the WPD will be addressed in just 5 years although we understand the caveat of “as resources allow.”
6. Page 4, there is a section regarding Contributing Planning Processes. Currently it contains reference to one multi-watershed plan (LCBP) and also one micro example (Ridge to River). This section should either be: (a) more comprehensive and list all the applicable Flow Restoration Plans, all individual Regional Plans and Town Plans, all applicable Stormwater Master Plans, all applicable Hazard Mitigation Plans or (b) simply list these types of Plans and note that they often include water quality related projects.
7. Page 7, Table 4 lists the prioritized waters list and stressed water lists. This list should be organized into a more user-friendly order, either from the mouth of the Winooski moving upstream or on the basis of primary pollutant/stressor, rather than DEC’s internal numbering system (e.g. VT08-01).
8. Page 32, Road Erosion Inventories: it might be useful to include a table here or reference a table in an Appendix. This section includes the following reference: “The plan recommends that technical and financial assistance be prioritized for interested towns based on water quality benefit of projects. Criteria to assess water quality benefit may include location of project in area prioritized for phosphorus reduction from roads

(see Chapter 4).” This is excellent detail but could be made more explicit as a bullet point.

9. Page 45-49, Priority Subbasins for Remediation: It would be helpful if there was better clarity on the geographic difference between a sub-basin used in Table 12, the HUC-12s shown in Figure 11 on page 63 and the catchments starting on page 69.
10. The reason clarity is needed is that the TBP endorses numerous priorities in different ways and it is confusing to the average reader to truly know which priorities are most important. For example,
 - a. The Executive Summary states that there are 11 top objectives and strategies.
 - b. On page 3 the Plan states that the Implementation Table and the Watershed Projects Database projects will be done in the next five years.
 - c. Table 12 identifies *“priority subbasins (that) have been identified as providing significant phosphorus and sediment loads to the watershed and/or are in need of protection for purposes of flood resilience.”*
 - d. Page 66 states *“(w)hat follows below - through a series of discussions, tables, and graphics - is an expression of the TMDL reductions required in as a site-specific manner as currently possible.”* This reference to “reductions required” would indicate that these are a priority.
 - e. Table 15 on page 69 identifies *“the top 20 catchments with the greatest overall identified TP reductions.”* Given that the Winooski TBP is the mechanism by which required reductions identified in the TMDL are to be implemented, projects in these catchments would appear to be the priority.
 - f. The start of Chapter 5, on page 132, states *“the focus of the plan is the identification of specific priority actions to reduce nutrient and sediment loading in priority subbasins as part of the effort to meet the Lake Champlain Phosphorus TMDL goals.”* This is an excellent statement but should be given more emphasis. However, this paragraph continues saying *“(t)he list of actions cover future assessment and monitoring needs (Table 11), as well as implementation projects that protect or remediate waters and related education and outreach.”* This only confuses the issue as it equates assessment and monitoring needs and education and outreach with implementation projects.
11. In conclusion, staff recommends that the next draft of the Winooski TBP,
 - a. More clearly list which on the ground water quality improvement projects should be constructed in the next five years and receive priority for state grant funds. For example, numerous projects with the best water quality improvement benefit-cost ratios have already been identified in Flow Restoration Plans, Stormwater Master Plans and Road Erosion inventories. The Plan should more clearly identify those projects rather than reference them only indirectly.
 - b. More clearly link or reference the priority catchment areas (the top 20 list in Table 15) with actual projects or with the stressed/impaired waters.
 - c. Detail which promising physical projects should be more fully scoped and designed in the next five years.
 - d. Separately list and prioritize monitoring and outreach projects.