



Date: August 30, 2018
To: CCRPC Clean Water Advisory Committee
From: Dan Albrecht, Senior Planner
Re: Analysis of August 29, 2018 draft of Winooski Tactical Basin Plan

The first purpose of this memo is to identify sections of the Tactical Basin Planning most applicable to municipalities so that you can focus your review.

Secondly, I'll outline the anticipated schedule of meetings and actions before the Plan is signed by the ANR Secretary later this fall.

Top Objectives and Strategies, page x

Applicable strategies include *“protect river corridors..., manage stormwater from developed areas..., ...implement high priority actions in existing road erosion inventoried sites, provide...financial assistance to wastewater treatment facilities, (and) assist municipalities in identifying areas of landslide hazards for protection of future development...”*

This list is clear and comprehensive but suffers from a lack of prioritization.

Bottom of page 3

Note reference to role of RPCs to *“develop an analysis and formal recommendation on conformance with the goals and objectives of applicable regional plans...”*

See attached spreadsheet for RPC's staff initial analysis of conformance.

Note statements with regards to municipalities as follows: *This Tactical Basin Plan encourages communities to take protective measures that will restore, maintain and enhance water quality in all areas that in turn protect human health, ecological integrity, and water-based recreational uses. The TBP does not preclude any development that is consistent with municipal bylaws, regional and municipal plans and with applicable State and federal regulations.*

Contributing Planning Process, page 4

This section has been improved through adding references to Regional Plans. However, this section could be improved through adding references to various Flow Restoration Plans and to the County's Hazard Mitigation Plan which also *“direct resources towards surface water protection and remediation strategies.”*

Impaired Waters and Priority Surface Waters, pages 14-21

I encourage you to read through in detail, *Table 4 “Basin 8 2018 Impaired, stressed and altered waters and planned management interventions”* to identify the Pollutant/Stressors affecting several key stream reaches within the Basin in Chittenden County such as *“...Sunnyside Brook, Muddy Brook, Shelburne Pond, the lower Winooski mainstem, Allen Brook, Sunderland Brook, Centennial Brook, Morehouse Brook, the Huntington River and Joiner Brook.”*

Stormwater Master Plans and Mapping, page 31-32

It is good to see these plans referenced but it should be expanded to make clearer reference to Flow Restoration Plans as these are a major information sources on planned projects.

Water Quality Monitoring and Assessment Needs, pages 41-45

I encourage you to read through in detail, *Table 11 “Additional proposed monitoring and assessment needs to inform remediation or protection strategies”* which identifies monitoring needs in several key waterbodies such as “...*Cobb Brook, Huntington River, Muddy Brook, Blanchard Brook and Mill Brook.*”

Remediation and Protection Strategies by Subbasins, page 45-48

This is critical portion of the Plan as it states “The priority subbasins have been identified as providing significant phosphorus and sediment loads to the watershed and/or need protection for purposes of flood resilience as well as maintaining high quality waters.”

Readers should carefully review “*Table 12 Strategies to address priority stressors and concerns in subbasins*” which includes strategies to address “...*Lower Winooski River mainstem; Centennial, Sunderland, Allen, Sucker, Alder and Muddy Brook; Mill, Johnnie, Duck, Joiner, Pinneo, Preston (and) Gleason (Brooks); (and) Cobb Brook, Hollow Brook.*”

Staff feels that this section would benefit from separating out the stormwater-impaired streams for clarity.

Vermont Statewide TMDL for Bacteria-Impaired Waters, page 53

Note reference to *2.6-mile reach of Allen Brook and .5-mile reach of Huntington River* which are listed as impaired. These reaches are subject to this TMDL which was completed in 2011 and sets “*bacterial load targets for each impaired waterbody.*”

Lake Champlain Phosphorus TMDL Phase II Plan, pages 59-61

This section describes how implementation of Tactical Basin Plans will help to meet the targets of this TMDL. *Figure 11 Comparison of HUC 12 and catchment watershed scales within the Winooski River Basin* and the *HUC 12 Tool* section describes how Total Phosphorus loading estimates can be generated for these geographic areas.

Table 15 Catchments with the greatest overall TP reductions as identified in the TMDL, pages 66-67

Note that catchments within *Williston, Essex, Richmond, Jericho and South Burlington* are included in this table.

Table 22 Catchments with highest estimated TP developed lands export, excluding roads, pages 91-92

Note that catchments within *Williston, Essex, Richmond, Colchester and South Burlington* are included in this table.

Table 23 Catchments with highest estimated TP export from paved roads, pages 93-94

Note that catchments within *Williston, Essex, Richmond, Colchester and South Burlington* are included in this table.

Table 24 Catchments with highest estimated TP export from unpaved roads, page 95

Note that catchments within *Richmond, Hinesburg and Jericho* are included in this table.

Municipal Managed Roads (Municipal Roads General Permit), pages 99-104

This section includes several maps and tables “to further assist municipalities in setting priorities through the road management planning process.” Table 26 Estimated loading for all non-VTRANS managed roads occurring in each non-MS4 municipality includes information for the towns of Bolton, Buels Gore, Hinesburg, Huntington, Jericho (and) Richmond.

Controlling Phosphorus from Wastewater Treatment Facilities and Other Industrial Discharges, pages 107-111

This section includes details on WWTF in “Burlington, Essex Junction, Global Foundries, Richmond, South Burlington (and) Winooski.

Chapter 5 – Implementation: Protection and Remediation Actions, pages 133-142

This section includes two important tables: “Table 36.....objectives, focus areas and strategies” and “Table 37 Summary of Implementation Actions” which goes into more detail on the types of actions that will fulfill the Strategies. It is important to note unlike previous Tactical Basin Plans that include a lengthy spreadsheet of individual projects, this Plan makes it clear that the actual discrete recommended Actions are located in DEC’s [Watershed Projects Database](#)

Staff still has concerns over the hubris in the Plan’s statement -- “(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---and hope that more realistic wording could be used.

This chapter includes the following strong statement on page 136 that “(i)t is VDEC’s goal to prioritize staff time and direct internal and external grant funding opportunities towards the recommended actions.It is our hope that these tables outline priorities that are realistic to implement over a five-year period, noting that there are many unforeseen variables, like landowner willingness and funding availability.

In closing, staff anticipates meetings related to CCRPC & public consideration of the Winooski TBP as follows:

September 4 Clean Water Advisory Committee

1. CWAC receives overview of TBP from Albrecht
2. Cmtee provides feedback

September 19 CCRPC Commission

1. Cmsn receives overview of TBP from Albrecht
2. Cmsn formally provides notice of October 17th hearing

September 25

Albrecht sends draft CCRPC Regional Plan conformance & comments letter to CWAC for pre-meeting review

October 2 Clean Water Advisory Committee

1. DEC staff attends to answer questions on TBP
2. CWAC comments/edits conformance letter and forwards to full Commission

October 2nd (6 p.m.) @ CCRPC

Public Forum on draft Winooski TBP co-hosted by CCRPC and DEC

October 17 CCRPC Commission

1. Cmsn holds hearing to obtain comments on draft plan(s) content from municipalities and CCRPC Commission
2. Cmsn reviews and approves submission of conformance letter and final CCRPC comments to DEC