



**Date:** November 2, 2021

**To:** Vermont Agency of Natural Resources, Department of Environmental Conservation  
Via: [anr.basin7comments@vermont.gov](mailto:anr.basin7comments@vermont.gov)

**From:** Clean Water Advisory Committee, Chittenden County Regional Planning Commission

**Re:** **Comments on the *Draft Lamoille River Watershed Basin 7 Tactical Basin Plan*.**

The CCRPC Clean Water Advisory Committee would like to again commend Department of Environmental Conservation (DEC) Watershed Planner Daniele Owczarski, on the comprehensive presentation and analysis contained in the *Draft Lamoille River Watershed Basin 7 Tactical Basin Plan*. The CCRPC Clean Water Advisory Committee has the following comments:

1. The TBP could be greatly improved by a more expansive discussion of the role MS4 permittees in the Basin (the Towns of Essex, Colchester and Milton) will have in helping the State meet the goals of the TBP due to the many permit requirements they must meet. Their required and long-standing Stormwater Management Programs along with the six Minimum Control Measures (MCM) should be described in greater detail as should the Phosphorus Control Plans (PCP) submitted in April 2021 by these three municipalities.

Appropriate text should be added to the “Stormwater (Urban & Residential non-road)” section, the “Stormwater Mapping and Master Planning” section and the “Roads” section. For example, MS4s must comply with the MRGP standards as part of their submitted PCPs while their Stormwater Management Programs and their compliance with their six MCM contribute to meeting B7 goals for reduction of stormwater runoff from both non-road and road environments.

2. Readers of the TBP will also benefit from a few added paragraphs of text describing the anticipated costs for each sector to implement the strategies and actions endorsed in the Plan. Without such a description, the reader is unaware of first, the overall financial cost and secondly, and more importantly, the average costs per pound of phosphorus removed from each sector. For example, in the 2016 Lake Champlain TMDL, DEC estimated costs of \$4,000 per kilo of phosphorus removed via upgrades to wastewater treatment facilities. However, in DEC’s 2019 Clean Water Performance Report, forested riparian buffer restoration projects and agricultural pollution prevention projects have cost estimates per kilogram of phosphorus reduced of only about \$100 per kilo and \$200-\$600 per kilo, respectively.
3. The discussion on “Act 76 Framework to Meet Non-Regulatory Targets” should include more detail on the appointment of the Northwest RPC to be the Clean Water Service Provider for Basin 7, the anticipated annual budget for Basin 7 to fund such Non-Regulatory Projects and the anticipated timeline for roll-out of funding for these efforts.

Thank you for your consideration of our comments. If you need clarification, please do not hesitate to contact Dan Albrecht, CCRPC Senior Planner at [dalbrecht@ccrpcvt.org](mailto:dalbrecht@ccrpcvt.org) or 802-861-0133.