



CHITTENDEN COUNTY RPC
Communities Planning Together

Municipal Roads General Permit Draft updates

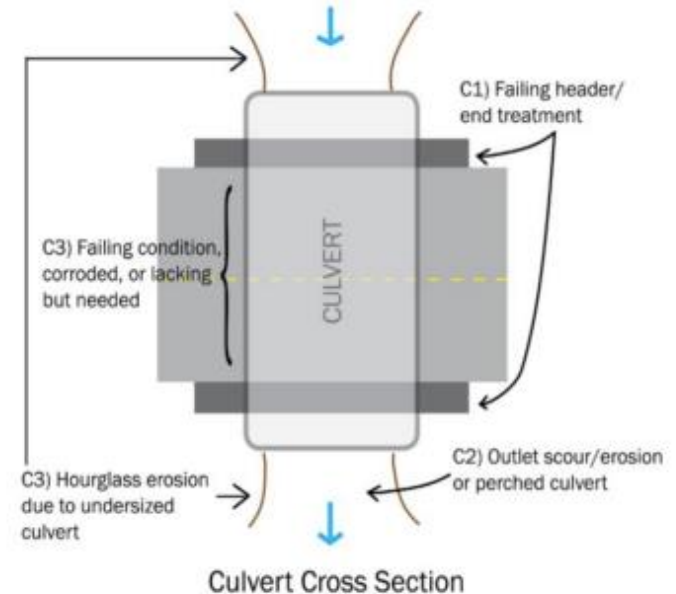
October 2022 Transportation Advisory Committee
Chris Dubin – Senior Transportation Planner

Overview

- Overview of changes to Municipal Roads General Permit (MRGP)
- Implications of new REI scoring methodology
- Re-issuance Public input
- REI update schedule

MRGP is being Re-issued in January 2023

- The second 5-year permit cycle will run 1/26/2023- 1/26/2028, approximately. (NEW)
- Towns will have to re-apply for coverage under the new permit before 1/26/2023 (NEW)
- Towns will be required to pay Administrative Processing Fee and Permit Review fees totaling \$640. (NEW)
- Annual Report Forms and Annual Fees (NEW) will be due April 1st each year



Overview of Changes

Section	Old	New	Notes
3.5 B Amendments	“Major amendments,” as defined in 10 V.S.A Chapter 170, will require the submittal of the permittee’s Road Stormwater Management Plan (RSWMP). The initial submittal of the RSWMP on or before December 31, 2020 shall constitute a major amendment.	“Major amendments,” as defined in 10 V.S.A Chapter 170, include the submittal of the permittee’s REI. The submittal of the REI on or before October 31, 2027 shall constitute a major amendment.	<ul style="list-style-type: none"> Removal of the term “Road stormwater management plan (RSWMP). This sort of faded out and was initially designed to be a work planning effort.
4.1 C Deadlines	Municipalities shall submit their first completed REI by December 31, 2020. The REI must be completed after June 1, 2016.	Municipalities shall submit their completed REI Reassessment by October 31, 2027. The REI Reassessment must be completed between May 1, 2023 and October 31, 2027. The initial REI, conducted during the first MRGP permit cycle, will serve as the basis for 6 implementation requirements until the second MRGP permit cycle REI reassessment is completed and officially submitted to DEC.	
4.2 Implementation Table	The municipality shall, within the first five-year permit term (by January 2023), upgrade at least 15% of the non-compliant road segments identified in the REI submitted with the RSWMP	The municipality shall upgrade at least 7.5% of non-compliant road segments identified in the REI submitted to DEC in the ITP (Implementation Table Portal) each year	<ul style="list-style-type: none"> I can work with municipalities to see if they have been meeting this 7.5% percent annually using our historic data, just for reference.
4.3 Very High Priority Segments	Hydrologically-connected paved and gravel road segments with drainage ditches scoring “Does Not Meet” on the REI, on slopes greater than 10 %, are considered Very High Priority Road Segments. Very High Priority segments shall be upgraded to meet the MRGP standards listed in Part 6 of this General Permit by December 31, 2025.	DEC will calculate Very High Priority segment scores using methodology described in the scoring methodology document. Twenty percent of all Very High Priority segments shall be upgraded to meet the MRGP standards annually, as part of the required 7.5% listed in Section 4.2	<ul style="list-style-type: none"> Need to get clarification as to what this 20% is based off. I think its going to be off of the current inventory (whether or not round 2 has been completed)

Overview of Changes- ext





<p>4.4</p> <p>Implementation and Compliance Schedule</p>	<p>Most of the implementation schedule dates from the original permit have passed except:</p> <ul style="list-style-type: none"> October 1, 2022 – Apply for authorization upon reissuance of the MRGP 	<ul style="list-style-type: none"> Jan 26, 2023 – NOI filed April 1, 20XX – Annual Reports ‘Filed’ October 31, 2027 – REI reassessment via the ITP November 1, 2027 – Apply for the authorization upon reissuance of the MRGP 	<ul style="list-style-type: none"> October 1, 2022 deadline likely won’t be relevant anymore.
<p>5.2</p> <p>Annual Reporting</p>	<p>See permit – nuanced rewrites but no substantive changes</p>	<p>See permit – nuanced rewrites but no substantive changes</p>	<ul style="list-style-type: none"> Ultimately the process for DEC is the same. They simply scan the ITP (portal) for whatever changes have occurred and use that for their reporting. It just means municipalities should get as much corrected/updated data into the portal by April 1st.
<p>6.1</p> <p>Feasibility</p>	<p>See permit – nuanced rewrites but no substantive changes</p>	<p>See permit – nuanced rewrites but no substantive changes. Removed “historic landscapes” and added clarifying language about historic structures included on the VT State or National Register of Historic places</p>	
<p>6.4</p> <p>Standards for Paved Roads with Catch Basins</p>	<p>Catch Basin Outlet Stabilization: All hydrologically-connected catch basin outlets shall be stabilized to eliminate all rill and gully erosion. Catch basin outfall stabilization practices include: stone-lined ditch, stone apron, check dams, and culvert header/headwall.</p>	<p>Catch Basin Outlet Stabilization: All hydrologically-connected catch basin outlets shall be stabilized to eliminate all rill and gully erosion. Catch basin outlet stabilization practices include: stone-lined ditch, stone apron, check dams, culvert header/headwall, and green stormwater infrastructure practices such bioretention practices, when appropriate.</p>	<ul style="list-style-type: none"> Added option for GSI practices as potential BMPs!

New Scoring Methodology

Erosion Score Rubric

- New Score = Sum (Practice Scores) + Sum (Erosion Values X Slope Multiplier)
- Practice Score Values
 - Fully Meets = 0
 - Does Not Meet = 2
(no partially meets)
- Practice Score Notes
 - Crown and Berm Practices are multiplied by 0.5
 - Drainage and Driveway Culvert scores not used here since they are erosion based
- Erosion Score
 - None = 0
 - Rill = 1
 - Gully = 3
- Erosion Score Notes
 - If no Erosion score, then use Practice score as proxy
 - Fully Meets = None = 0
 - Partially Meets = Rill = 1
 - Does Not Meet = Gully = 3
- Slope Multiplier
 - Slope < 5 = 1
 - Slope <= 10 = 2
 - Slope > 10 = 3
- Culvert Erosion Score
 - Each culvert is scored independently
 - Driveway culvert are multiplied by 0.5
 - Drainage culvert are multiplied by 0.75
 - Intermittent Stream proposed new culvert

Erosion Score Priority Grouping

• <= 2	Low	
• <= 6	Medium	
• <= 10	High	
• > 10	Very High	

New Scoring Methodology Analysis

Municipality	Fully Meets	Partially Meets	Does Not Meet	Very High Priority	<= 2.0	<= 6	<= 10	> 10	Ratio [Low] / [FM]	Change [Very High] - [VHP]
					Low	Medium	High	Very High		
Bolton	144	58	44	10	215	26	2	3	1.49	-7
Burlington	113	0	0	1	113	0	0	0	1.00	-1
Charlotte	372	19	7	1	387	7	1	3	1.04	2
Colchester	382	4	9	4	384	5	3	3	1.01	-1
Essex	319	19	11	12	323	23	2	1	1.01	-11
Essex Junction Village	147	0	0	0	147	0	0	0	1.00	0
Hinesburg	370	55	32	7	392	40	13	12	1.06	5
Huntington	252	100	111	29	367	78	13	5	1.46	-24
Jericho	306	73	51	1	379	49	1	1	1.24	0
Milton	564	53	11	2	573	49	5	1	1.02	-1
Richmond	408	120	61	2	557	29	2	1	1.37	-1
Saint George	9	0	0	0	9	0	0	0	1.00	0
Shelburne	389	6	7	0	392	10	0	0	1.01	0
South Burlington	331	5	4	119	331	6	2	1	1.00	-118
Underhill	232	103	149	15	420	64	0	0	1.81	-15
Westford	298	71	41	2	321	71	16	2	1.08	0
Williston	361	31	29	1	370	40	9	2	1.02	1
Winooski	6	1	0	2	6	1	0	0	1.00	-2

MRGP Re-issuance Public Input

- The MRGP public notice period will begin shortly after Labor Day 2022 for a 45-day comment period
- Public meetings will be held on October 10th (virtual- Teams meeting invite 5:00-7:00) and October 11th (in-person at the ANR Annex Building in Montpelier 1:00-3:00)
- There will be a Comment Responsiveness Report prepared
- The permit will be re-issued in late November 2022
- Towns will re-apply for coverage and pay fees from November through January 26, 2023 (all MRGP towns will be notified)

Comments due October 24th!

REI update Schedule

- 2nd round of REIs will start summer of 2023
- 2-3 year update schedule for complete town wide inventories
- Request based, then back fill
- Hope to break up MS-4 and non MS-4 municipalities