



RUTLAND REGIONAL PLANNING COMMISSION

TO: Ethan Swift, Program Manager, VT DEC Monitoring, Assessment and Planning Program

FR: Barbara Noyes Pulling, Senior Planner, Rutland Regional Planning Commission

DT: December 18, 2017

RE: RRPC review of draft South Lake Champlain Tactical Basin Plan

The staff of Rutland Regional Planning Commission (RRPC) and members of its Board of Commissioners have reviewed the draft South Lake Champlain (Basins 2 & 4) Tactical Basin Plan (TBP) dated November 2017. As with many draft TBPs, there is room for improvement, and we tried to make our comments and concerns as constructive as possible for you.

RRPC staff and board members reviewed the draft TBP between November 21 and December 18, 2017. Staff also attended the two public meetings on the draft plan in Poultney on November 28 and in Orwell on November 29. At those meetings, we hoped to get a sense of what the public and stakeholders thought of the draft plan. However, since these meetings were hastily scheduled shortly after the release of the draft TBP, participants were not prepared to make comments above the draft plan itself.

RRPC's overall observation is that given the draft TBP's expedited schedule to go out for comment and review, thoroughness and accuracy were sacrificed. Our review process determined that the draft plan suffers from weak organization, repeated material, and plan-wide formatting issues. What's more, this draft does not compare well to other recent TBPs which are more concise and better organized – such as the 2016 Lamoille River TBP and 2016 Missisquoi Bay TBP – even though these TBPs include the same elements. **For these reasons, we recommend that the draft TBP be pulled back, rewritten, and then be sent out for a second round of public comment.**

The draft plan's Executive Summary on pages 9-10 is a case in point. It does not present a condensed description of the report. Instead, it is a bulleted list of "Top Objectives and Strategies" which is just one of many important topics covered in the plan. Furthermore, in the introductory paragraph of the Executive Summary, it's stated that each item on the list will identify a table and section of the plan where there would be more detail. However, there are no references to future sections or pages. There also is no summarizing paragraph or two about this the importance and need for this plan update. Also, there is no explanation of the differences between the upcoming TBP and the Phase II Implementation Plan. This is not an adequate Executive Summary, and it exemplifies other weaknesses in the draft plan.

The following is a list of our comments on the remainder of the draft TBP:

Page 3: It would be clearer if the sections of South Lake Champlain were more clearly identified (singled out) on the map. For example, show the Castleton River, not just arrows to unidentified sections of towns. There are too many arrows and not enough clarity. Perhaps multiple maps of the sections showing the focus of clean-up efforts would be more understandable.

Pages 5-7: Please include page numbers for the various lists of Figures and Tables.

Pages 11-13: This is the second section labelled SLC TBP "Overview." The first was for the map of focal stressors on page 3. Should it be mentioned that there is a link between the map and the material on these pages? Also, perhaps some of the material here belongs in the Executive Summary?

Page 13: The Summary of Classification Opportunities seems out-of-place with the pollution/stressors that precede it on pages 11-12, and there is no detail about why it is in the plan.

Page 15: There is outdated information because there is no mention of South Lake Champlain TBP completed in 2014.

Pages 15-16: Two conservation districts in this region are mentioned, Poultney Mettowee and Otter Creek, but shouldn't the Addison County conservation district replace Otter Creek and be described?

Page 16: RRPC is mentioned, but shouldn't Addison County RPC be mentioned and described as well?

Page 16: RRPC description should include its Clean Water Advisory Group that has been meeting throughout the SLC TBP since early 2016.

Pages 15-21: Is it necessary to identify watershed partners this early in the plan? Shouldn't this section be more about the Clean Water Act and TMDL?

Pages 21-23: Section D is about the Vermont Clean Water Act. Shouldn't this appear sooner and be part of the Executive Summary and Overview?

Page 23: Same comment about the Implementation Process. Move it up?

Page 24: this map is impossible to see/read. There's too much going on in it.

Page 25: Water quality and watershed descriptions seem to belong in Chapter 1; preferably before the list of Watershed Partners.

Pages 32-38: Section C: the compilation of assessments of SLC needs its own chapter or better formatting because it's buried here. Combine it with Section D (pp 38-44).

Page 33: Spacing error in the text near the bottom of the page.

Page 35: Period missing the third line of text.

Pages 41-42: The text in paragraph 2 of page 41 states that Lake Bomoseen is in the top 5% of all lakes for biodiversity; but on page 42, table 5 states it's in top 10%. If it's both, shouldn't the more impressive figure- 5% - be used?

Pages 45-66: Some of this explanation of stressors needs to be included at the top of the plan in the Executive Summary or Overview.

Page 47: What is Figure 10; there is no title.

Page 57: Managing Stormwater Runoff is buried here. Shouldn't it be more prominently formatted? The sections are starting to run together, and it's difficult to keep up with the topics.

Pages 63-112: The TMDL sections seem buried here as well. At the very least, TMDL: The Basics, etc. should come before the new state regulations to help explain why they're needed. The TMDL Phase II section is buried too. Better formatting might help.

Page 65: There's a reference to Figures 2 &3 in the second paragraph. Where are these?

Page 67: The title of Figure 17 is cut off.

Page 68: The title of Figure 18 is cut off.

Page 72: Figure TMDL2 is too small; it's impossible to see all the information there. Perhaps some of these graphs can be oriented as landscape instead of portrait so that they can take up more of the page?

Page 85: Table LA-3 is cut off. Start it on the following page instead? Consider using a smaller font on all figure titles to make this easier to read?

Pages 87: Title for the second set of SWAT loading estimates are cut off at the bottom of this page. What figure # is this? Start it on the following page instead?

Page 89: RAPs went into effect December 2016. Right?

Page 113: There are several paragraphs explaining "public contributions to the planning process" for water re-classification. Perhaps this should be made more prominent (easier to find) by putting a box around this information?

Pages 113—114: A definition of Class B waters would be helpful - not just A(1) and A(2).

Page 120: Last paragraph starts with "Finally..." This doesn't seem the right word. Also, the statutory reference does not include the reference to RPC regional plans in 10 VSA § 1253 (2)(G): "Develop, in consultation with the regional planning commission, an analysis and formal recommendation on conformance with the goals and objectives of applicable regional plans."

Pages 123-133: The "heart of this plan" is another example of significant material that's buried and not formatted to emphasize its importance. Other TBPs have this section at the very end of the plan and it's

easier to find. This draft plan has it at the end, yet it doesn't seem distinct enough from the list of references and appendices that follow.

Page 125: In #14-18, please remove PMNRCD and OCNRCD. Otherwise, this is a duplication of effort that RPCs have been doing successfully for years.

Page 126: In #19, please remove OCNRCD (for the reason stated above) and add RRPC.

Page 129: In # 44 and 45, please add RRPC.

Page 130: In #47-50, please add RRPC.

Page 133: In #53, please delete PMNRCD. This is what RRPC has been doing with its towns for several years now; it would be confusing to add another organization.

Pages 143-144: Appendix A-Existing Use Tables need to be re-formatted. Information is cut off/missing on both pages.

Page 146: This is blank.

Pages 167-175: It would be helpful to add the dates of these plans to give the table more relevance when projects are completed. Right?

RRPC staff's final comment applies to the entire draft TBP for South Lake Champlain. This part of the state is still home to quarrying activities. Although quarrying is now nowhere near the historical levels that made the Rutland Region a state leader in marble and slate extraction, it is still part of our economy. What modern quarrying is not part of, is this plan or, apparently, the state Clean Water Act.

In 2014, Vermonters for a Clean Environment documented a number of problems slate operations in particular pose for local water quality and public health, and presented this information to the State Legislature. Periodically, local news media reports also highlight water quality concerns and health with slate quarrying activities.

If Vermont is indeed promoting that "we're all in" for the clean-up of our surface waters, then we need to make the quarrying industry's issues more transparent in the TBP and make them part of the solution, as has already been done with agriculture and forestry industries. The state also may want to include sand and gravel operations in TBPs for the same reasons.

Thank you for providing us the opportunity to review this draft TBP.

Barbara Noyes Pulling
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