

Lamoille County Planning Commission

(802) 888-4548 • e-mail: lcpc@lcpcvt.org • fax: (802) 888-6938

October 26, 2021

Dear Danielle Owczarski,

Thank you for the opportunity to review the draft *2021 Lamoille River Watershed Tactical Basin Plan* for conformance with the *2015-2023 Lamoille County Regional Plan*. Lamoille County Planning Commission staff have reviewed the draft plan for conformance with the *Regional Plan* in accordance with the following sections of Vermont Statutes Title 10, Chapter 47, §1253(d):

- (2)(G) ... *the Secretary [of Natural Resources] shall: develop, in consultation with the regional planning commission, an analysis and formal recommendation on conformance with the goals and objectives of applicable regional plans;*
- (3)(D) ... *[the regional planning commissions are to] assist the Secretary in implementing a project evaluation process to prioritize water quality improvement projects within the region to assure cost effective use of State and federal funds.*

The Lamoille River Tactical Basin Plan covers nearly all Towns in Lamoille County except for the Town of Stowe and southeastern portions of Elmore. The following comments summarize LCPC's review of conformance with the *Regional Plan*. This review highlights relevant goals, policies, and action items from the *Regional Plan* in relation to the goals and strategies of the draft *2021 Lamoille River Watershed Tactical Basin Plan*.

Conformance with the 2015-2023 Lamoille County Regional Plan

The *2015 Lamoille County Regional Plan* is guided by three primary objectives.

1. **To guide growth into compact settlements**, whether historic or new, for efficient land use and development. The *Regional Plan* refers to these as "Center and Enterprise Areas."
2. **To protect the region's natural and working landscapes** by promoting thriving, compact village centers surrounded by rural countryside.
3. **To guide growth that promotes sustainability of the region's rural natural systems**, valuable agricultural and silvicultural resources, and recreation amenities.

The draft *2021 Lamoille River Watershed Tactical Basin Plan* is in conformance with these objectives. The Lamoille River and its tributaries are critical natural resources. Many of the basin's surface waters are recreational amenities play an important role in the region's tourism and out-door recreation-based economy and improve the quality of life for residents. The *Basin Plan* highlights priority areas including village centers for maintaining and improving surface waters (Ex: mitigating stormwater runoff on developed lands), while encouraging the protection and restoration of "natural infrastructure" including floodplains, river corridors, wetlands, lakeshores, and forestland. The *Basin Plan* recognizes the importance of restoring and protecting these natural features to promote flood resiliency. The *Lamoille River Watershed Tactical Basin Plan* is guided by the following framework and practices in conformance with the above primary objectives of the *2015 Lamoille County*

- Municipal & Regional Planning • Transportation Planning • Emergency Preparedness Planning • GIS Mapping Services • Grant Administration • Census Data •

Regional Plan. This framework is outlined in Chapter 4 of the *Tactical Basin Plan*, addressing strategies by land use sector.

Tactical Basin Planning Framework to Enhance, Maintain, Protect, and Restore Water Quality:



Figure 15. An illustration of the land use sector framework and practices used in Tactical Basin Planning to enhance, maintain, protect, and restore water quality.

In addition to this Tactical Basin Planning framework, the *2021 Lamoille River Watershed Tactical Basin Plan* outlines implementation strategies by land use sector referenced in Chapter 5 “The Basin 7 Implementation Table.” See below examples of implementation strategies in conformance with the three primary objectives of the *2015-2023 Lamoille County Regional Plan*:

Agricultural Lands

- Provide education, outreach, and technical assistance to agricultural communities in priority sub-basins.
- Continue funding to support the AAFM Farm Agronomic Practices (FAP) Program, Conservation Reserve Easement Program (CREP), Grazing Technical Assistance (TA), and NRCS investments in soil-based agronomic practices to improve soil health, increase crop production, and reduce erosion and surface runoff from agricultural fields and to support the agriculture phosphorus reduction targets in fields and pastures.

Developed Lands

- Provide technical and funding support to develop high priority projects from recently completed stormwater master plans and Phosphorus Control Plans.
- Provide information and funding to municipalities and watershed partners on DEC standards and training opportunities for operations and maintenance of installed stormwater BMPs.
- Provide outreach to towns on the Green Stormwater Infrastructure toolkit to consider changes to bylaws and municipal regulations in growth centers.
- Implement projects addressing vulnerabilities from flooding and fluvial erosion from county and municipal All-Hazards Mitigation Plans where water quality improvements are present.

Wastewater

- Provide information on the ANR Village Wastewater Solutions to any communities that have inadequate individual onsite wastewater treatment on small, challenging sites, and funding for planning and implementation of priority projects that are identified and have community support.
- Support upgrades to public wastewater treatment facilities.
- Support relocation of septic systems and/or floodproofing of on-site septic systems.

Natural Resource Protection and Restoration

- Support recreational access to the Lamoille River through the establishment and maintenance of stable access areas, portage trails and river campsites.
- Implement priority projects from the Lamoille River Flood Study to reduce ice jams and improve flood resiliency and water quality.
- Scope, design, and implement high priority bridge and culvert replacements to improve aquatic organism passage, stream geomorphic compatibility, and flood resilience as identified in statewide and local assessments (e.g., river corridor plans, culvert inventories, hazard mitigation plans).
- Maintain and build the capacity for the Greeter & VIP Program to monitor and manage aquatic invasive species.
- Implement forest land conservation practices and land conservation projects.

- Identify headwaters and sensitive surface waters in large forest blocks for protection through conservation easement and land acquisition.

Many of these implementation strategies noted in chapter 5 of the *Lamoille River Watershed Tactical Basin Plan* are in conformance with policies and action items identified in the Transportation, Recreation, Working Lands, Water Resources, and Flood Resilience chapters of the *2015-2023 Lamoille County Regional Plan*. The following are policies and action items extracted from these Regional Plan chapters promoting similar strategies to the above framework and implementation strategies of the *Lamoille River Watershed Tactical Basin Plan*.

Policies and Action Items from the Regional Plan Conforming to the Lamoille Tactical Basin Plan

Transportation:

- Work with municipalities to identify “flood resiliency” improvements to the transportation network, especially as they relate to Center Areas, such as but not limited to constructing bridges and culverts to accommodate a 50-year flood event.

Recreation:

- LCPC supports locally initiated and led efforts to maintain, improve, and ensure access to the region’s recreational activities, facilities, resources, and amenities.
- Ensure regional growth does not diminish the value and availability of outdoor recreational activities.
- Use recreation as a tool to preserve land and promote land stewardship while encouraging economic development opportunities that consider impacts to natural resources.

Working Lands:

- Increase awareness of the Region’s diverse fish and wildlife populations and the Region’s importance in sustaining populations of rare, threatened, and endangered species, such as loons and Peregrine falcons.
- LCPC supports locally initiated efforts to conserve farm and forestland. Once conserved, plans for management of such lands shall be developed in consultation with the host community.
- Support local efforts to create and manage town forests. Encourage efforts that include outreach to private landowners regarding sound forest management techniques.

Water Resources:

- Preserve the quality of the region’s lakes and rivers as a resource for human recreation and wildlife.
- Support efforts of lake associations, watershed associations, and other water-related groups to protect water resources and recreational experiences.
- Support adopt-a-river campaigns and annual river clean ups.
- Support sustainable fisheries management.
- Support state water quality regulations

- Healthy riparian areas are critical to stream bank stabilization and fisheries and wildlife habitats; therefore, riparian areas should be restored and protected.
- Strongly encourage restoration of riparian buffers of at least 50 feet along all surface waters.
- Existing riparian and shoreland vegetation should be protected through such tools as management zones, river corridor, riparian buffer and shoreline zoning.
- Support riparian corridor education efforts.
- Assist lake associations and watershed groups in obtaining grant funding to support their efforts.
- Encourage communities to protect significant water resources that provide public recreational opportunities or are areas of significant historical, scenic, and recreational value as determined by this regional plan and applicable municipal plans.
- Work with developers and municipalities to protect very high quality rivers, lakes, ponds and wetlands identified as high-priority in the DEC tactical basin plan.
- Encourage the use of ANR's online mapping tools such as Biofinder and the Natural Resource Atlas to identify significant water resources.
- Support federal and state wetland protection rules.
- Encourage municipalities to protect wetlands through zoning and subdivision regulations, shoreland protection bylaws, health ordinances and flood hazard regulations.
- Rivers should have access to floodplains wherever possible to establish and maintain stability in order to minimize stream bank erosion and avoid conflicts with human infrastructure.
- Mitigate floodplain encroachments wherever and whenever possible. Mitigation may include "compensatory storage," removal of infrastructure, floodplain reconnection/re-vegetation, and/or implementation of projects identified in a river corridor plan or local hazard mitigation plan.
- Assist municipalities in implementing wetland, river corridor and riparian buffer protections to preserve these resources.
- Work with municipalities, developers, and regional partners to encourage land use practices that use appropriate erosion control techniques.
- Stabilization of eroded stream banks is encouraged in accordance with appropriate professionally accepted standards.

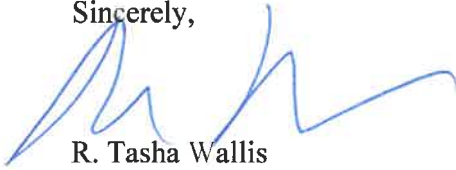
Flood Resilience:

- LCPC encourages municipalities to adopt flood hazard regulations that prohibit new development in the flood hazard areas and river corridors and encourage mitigation of existing development within these areas.
- Protect areas that help to attenuate flooding, such as wetlands, floodplains, river corridors and upland forests.

- LCPC encourages the protection of wetlands, floodplains, river corridors, land adjacent to streams, wetlands, and upland forests, to reduce the risk of flood damage to infrastructure and improved property.
- Restoration of riparian buffers of at least 50 feet is strongly encouraged along all surface waters.
- Existing riparian vegetation should be protected through such tools as management zones and shoreline zoning.
- LCPC supports riparian corridor and upland forest education efforts.

Thank you again for the opportunity to review the draft *2021 Lamoille River Watershed Tactical Basin Plan* for conformance with the *2015 Lamoille County Regional Plan*. This review demonstrates that the *Lamoille Tactical Basin Plan* conforms with the *Lamoille County Regional Plan*.

Sincerely,



R. Tasha Wallis
Executive Director
Lamoille County Planning Commission
tasha@lcpcvt.org
802-851-6346