Background

- 2015 - Act 64/Vermont Clean Water Act
- 10 V.S.A Sec. 1264(c)(6) required a general permit for discharges of stormwater from municipal roads
- Permit became effective January 26, 2018
  - Expires 2023
  - By October 1, 2022 municipalities must apply for coverage upon reissuance
- Covers all municipal roads Class 1-4
Road Erosion Inventories

- Assessment of all hydrologically connected (HC) road segments
  - About half of all roads
- Score each segment as ‘Fully Meets’, ‘Partially Meets’, or ‘Does Not Meet’
- Due December 31, 2020 - all ACRPC towns met the deadline
Road Erosion Inventories

- Standards for
  - Road Crown
  - Berms
  - Drainage (i.e. Ditches)
  - Conveyances
  - Driveway and Drainage Culverts
    - (but NOT culverts carrying perennial streams)
Addison County Hydro-connected Road Segments from REIs

- Incomplete: 9.1% (619 segments)
- Partially Meets: 20.6% (1399 segments)
- Fully Meet: 68.2% (4630 segments)

Total segments: 6650
<table>
<thead>
<tr>
<th>Town</th>
<th># Segments</th>
<th>Not Connected</th>
<th>Fully Meet</th>
<th>Partially Meets</th>
<th>Does Not Meet</th>
<th>Incomplete</th>
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<td>Addison</td>
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<td><strong>1399</strong></td>
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Compliance Schedule

- **2023 January** - 15% of non-compliant road segments from REI upgraded
- **2025 December 31** - All ‘Very High Priority’ segments on Class 1, 2, or 3 roads meet standards
  - Road slope >10% and scored as “Does Not Meet” in REI
  - Catch basins with 3 cubic yards or more of erosion
- **2028 December 31** - All HC Class 4 roads with slopes >10% meet standards
- **2036 December 31** - All hydrologically-connected municipal roads meet standards
Grants in Aid

Technical support and grant funding to municipalities to promote the use of erosion control and maintenance techniques that save money while ensuring best management practices are completed in accordance with the Vermont Department of Environmental Conservation’s Municipal Roads General Permit (MRGP.)

Pre-construction site visits for FY22 can be scheduled at any time now.
# Very High Priority Segments to be Improved by 2025

- Addison: 0 Complete, 0 Not Completed
- Bridport: 0 Complete, 0 Not Completed
- Bristol: 0 Complete, 15 Not Completed
- Cornwall: 0 Complete, 2 Not Completed
- Ferrisburgh: 0 Complete, 4 Not Completed
- Goshen: 0 Complete, 4 Not Completed
- Leicester: 0 Complete, 2 Not Completed
- Lincoln: 0 Complete, 0 Not Completed
- Middlebury: 0 Complete, 22 Not Completed
- Monkton: 0 Complete, 0 Not Completed
- New Haven: 2 Complete, 2 Not Completed
- Orwell: 0 Complete, 17 Not Completed
- Panton: 0 Complete, 2 Not Completed
- Ripton: 0 Complete, 0 Not Completed
- Salisbury: 0 Complete, 3 Not Completed
- Shoreham: 0 Complete, 1 Not Completed
- Starksboro: 1 Complete, 23 Not Completed
- Vergennes: 0 Complete, 4 Not Completed
- Watham: 0 Complete, 0 Not Completed
- Weybridge: 0 Complete, 2 Not Completed
- Whiting: 0 Complete, 2 Not Completed
Challenges

Reporting requirements have been confusing -

- Annual reporting fee
- Additional permit amendment fee after inventory completed and submitted
- Most towns have complied at this point
Challenges - Updating REIs and tracking work completed.
For reports due April 1, 2022 and after, municipalities shall submit an annual report, to include the following information:

1. Changes to MRGP compliance status (Fully, Partially, and Does Not Meet) for completed road segments, and the dates upgrades were completed.

2. Recalculation of remaining segments to be upgraded by end of permit term (January, 2023).

3. Identification of any changes to the hydrologically-connected status of any road segment.
Moving Forward

- VTrans has taken over GIA program from DEC
- Each municipality needs to develop a system for recording work completed/upgrades
- DEC has to revisit the permit conditions before 2023
  - Need to redo REI?
  - Other changes in timeline or requirements?