

Dear David and members of the Selectboard,

Thank you for your letter requesting Conservation Reserve Funds to retroactively cover the town's cost for the installation of riprap downstream of the Bridge St. bridge.

As you know, the Richmond Conservation Commission (RCC) has had several objections to this project. We do acknowledge that both the RCC and the Selectboard (SB) share the common goal of trying to address riverbank stabilization, and that we only differ in the methods used to achieve this end. Please keep in mind that to our minds it seems contradictory to install a material that will only serve to increase downstream erosion, when the erosion downstream is already problematic.

Other misgivings included that only one bid was solicited; that the town by-passed the budget process; and that the project doubled in length and cost and no explanation was provided for the expansion.

The receipt of the application created two additional issues: if we approve the use of CRF funds for this purpose, it sets a precedent for cost reimbursement, rather than for direct funding. And if the SB overruled us, it sets another precedent, as so far in the existence of the RCC, the SB has always respected the RCC recommendations.

Nonetheless, we considered the application with an open mind.

For the convenience of the SB, please find attached the SB application; Gretchen Alexander's letter, and my response to the Jon Kart's draft of the application.

We believe the application does meet several of the criteria for funding. Those include: A1, A2, A4, A5, A7, A8, B7, B8, D2. Several other relevant criteria do not appear to be met. Indeed, it can be argued that they would argue against funding. The lead example is B1, the criterion stating that the fund can be used if it "Preserves river, stream and wetland quality".

The RCC made several requests for further information in its initial rejection of the Application, indicating that a revised version certainly should be considered by the Town. The re-Application addressed several of these and is much stronger.

While recognizing that action need to be taken, certain RCC members continue to have misgivings about the impact of rip-rap, particularly downstream. While exactly what that impact might be for this particular circumstance is unknown, the literature is extensive with regard to negative impacts of such efforts to direct river movement. Several RCC members would have preferred a more in depth, literature-based analysis of the pros and cons of rip-rap and the rationale for choosing that alternative. One example is: [https://winooskiriver.org/images/userfiles/files/Stream Guide 1-25-2012](https://winooskiriver.org/images/userfiles/files/Stream%20Guide%201-25-2012). As noted in Gretchen Alexander's memo of 3/23/17, downstream erosion is to be expected. The issue is acknowledged in the application, though there is no discussion as to why it should not be deal-breaker. At the same time, other RCC members felt that the benefit

outweighed negative impact. It is recognized as one of relative values / a balancing act, as was recognized by individuals such as Gretchen Alexander in her memo of 5/25/17.

There certainly are valid arguments that rip-rap is (was) the best solution. However, the application would have benefitted from a point-by-point response to the alternatives described by Gretchen Alexander in her letter of 5/25/17, including do nothing but monitor (to figure out best solution); combine tow armoring with bank sloping and bioengineering, using hard armoring; include recreation access into the stabilization design to limit its further contribution to erosion, create a vegetation buffer. Thus, it is not entirely accurate to say there is no alternative.

The application would have benefitted from input from downstream land owners, for example Chuck Farr, recognizing their land could be adversely affected. It is not clear that those landowners have been part of the loop.

Some RCC members were concerned about the precedence in funding a project for which funding already has been identified. In some cases, funding received has led to reduction in the request for CRF funding, the Andrews Forest project a recent example.

The question was raised as to whether the Project more normally would be covered by the Town General Fund.

Page 3 of the Application indicated there are to be new plantings. Indeed, RCC is most interested in discussion of additional stream bank work, as referenced at the top of page 5 of the application and as suggested in the Alexander 3/23/17 memo. Current efforts to develop a proposal, including funding from other sources such as the State and Friends of the Winooski were described at the 3/12/19 meeting. RCC expressed enthusiasm for such a project and was interested in receiving a proposal to use CRF funds.

At one point during the fervent discussion of the application, a possible solution to avoid the retroactive funding occurred, which was to re-direct the requested amount of CRF money for use on the further downstream erosion. But Jon Kart insisted that he had the funds to do that work and did not need ours. After a great deal of discussion, including input from Jon Kart and Josh Arneson, and knowing that the town has the money to cover the costs of the riprap without RCC funds, the exhausted RCC approved a motion to recommend to the SB that \$20,000 of the CRF be used to retroactively cover the costs of the riprap.

We respectfully request that the SB keep in mind that though we reduced the amount the SB requested, the town does not urgently need the money but the RCC has several proposals in the works for use of the CRF for other projects. We understand that the SB can override our decision, but we hope that in the same spirit of compromise that led us to approve any money for riprap, that the SB will agree to the reduced amount and not set a precedent of overriding our recommendations, and added bonus plus, leaving us enough money to complete the pending projects.