

## Kayla Vaccaro < kvaccaro@richmondvt.gov>

## (no subject)

**Medash, Kyle** <Kyle.Medash@vermont.gov>
To: Keith Oborne <koborne@richmondvt.gov>
Cc: Kayla Vaccaro <kvaccaro@richmondvt.gov>

Thu, Feb 3, 2022 at 3:35 PM

Hi Keith,

Thank you for the application for review on the upgrades to the CSWD facility at 80 Rogers Lane. The entire facility is within the 1% SFHA (Zone AE) of the Winooski River and would be subject to approximately 1' to 6' of inundation flooding during the base flood (existing contours on the site range from 297' at the north to 303' at the south) and the BFE is ~303.8'.

Since the entire facility is within the FHOD it is subject to compliance with the regulations outlined in Section 6.8 of the Town's Zoning Regulations. The attached application is incomplete since it does not address compliance with Section 6.8. The two new buildings could be considered a "substantial improvement" or treated as new/replacement non-residential accessory structures (the requirements are generally the same) and permitted as a conditional use. New non-residential or accessory structures would need to have the low floor elevated to 1' above BFE or utilize wet or dry floodproofing construction techniques in accordance with the development standards outlined in Section 6.8.16. Additionally, any fuel storage tanks would need to be anchored and fill/vent pipes elevated to 1' above BFE, and mechanical/electrical components would need to be kept above the BFE, utilize GFCI protection, etc. The proposed connex trailers would need to be anchored and elevated or wet – floodproofed. For purposes of review under the flood hazard regs, the connex trailers would be considered an accessory structure since they will be on site permanently. The current application lacks the information needed to confirm these details.

In general, since the entire site is being revamped in some way – we want to think about this project in a way that provides protection from flooding. My concerns here would be with the open piles (compost, yard waste, tires, etc.) and how these piles are contained. If the site were to flood, we want to make sure these items are contained and are not subject to floatation and strewn about the site and/or washed off site. Dumpsters/containers should be contained or anchored to prevent flotation. Any hazardous materials or contaminants (the battery storage comes to mind here) should be stored above the BFE and contained. When the next flood happens, we want a situation with the least human intervention necessary to prepare the site to flood safely. I know a lot of the items on site are mobile in nature and frequently moved around, but there needs to be a plan in place in the event of a flood and all of that begins with having this in mind with the initial design.

Any application for development in the FHOD should contain all information outlined in Section 6.8.17 (b). This includes existing grades, low floor heights of the new buildings, BFE, building/pile containment footprints, fuel tanks, anchoring details for fuel tanks/connex trailers, mechanical and electrical equipment details, etc. This information is necessary to ensure compliance with the FHOD development standards and the current application lacks much of these details. Please let me know if you have any questions or would like to further discuss. I'm available to review further details as they become available. As always, other State, Federal or local permits may be required for this project. These comments are offered in accordance with 24 VSA §4424.

Respectfully,



Kyle Medash I Western Floodplain Manager

Vermont Agency of Natural Resources | Department of Environmental Conservation

Watershed Management Division, Rivers Program

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From: Keith Oborne <koborne@richmondvt.gov>
Sent: Monday, January 31, 2022 5:13 PM
To: Medash, Kyle <Kyle.Medash@vermont.gov>
Cc: Kayla Vaccaro <kvaccaro@richmondvt.gov>
Subject:

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