



Tyler Machia <tmachia@richmondvt.gov>

Richmond, VT Mobil Redevelopment

Medash, Kyle <Kyle.Medash@vermont.gov>

Thu, Jun 30, 2022 at 1:55 PM

To: Huseyin Sevincgil <hsevincgil@gpinet.com>, Tyler Machia <tmachia@richmondvt.gov>, Ravi Venkataraman <rvenkataraman@richmondvt.gov>

Cc: tomf <tomf@sumd.com>, Jeremy Greeley <jeremy@rtmudge.com>, Cory Mason <cmason@gpinet.com>

Hi Huseyin,

Thank you for forwarding this application along for review. I see you have mostly addressed the project location in the FEMA mapped Special Flood Hazard Area (SFHA) and how that relates to the Town of Richmond Flood Hazard Area Regulations; however, as indicated in the notes on pg. 4 of the plan set the project is also subject to an Act 250 permit. In the case of the Act 250 permit, I would be providing comments on how the project complies with Criterion 1(D) Floodways to the NRB. Development standards for Act 250 projects in the SFHA can be reviewed in the [Flood Hazard Area & River Corridor Procedure](#). (Section 7.0). For this project, meeting the Act 250 criteria would ensure that you are also meeting the Flood Hazard Area Regulations for the Town of Richmond.

The most significant issue I see with the current proposed design is the finished floor elevation of the new building. In accordance with the Procedure, the new low floor height would need to be 2' above the BFE, or since this is a non-residential building it could be dry-floodproofed to 2' above BFE as mentioned in the plan set. A dry-floodproofing design would need to be designed by a qualified professional with stamped engineering plans specific to the dry-floodproofing design, and obtain a dry-floodproofing certification. More information can be found in [FEMA NFIP Technical Bulletin 3](#), the floodproofing certification is outlined in Section 1.2.

The second issue would be with site regrading and flood storage volume. It appears that your plan proposes to excavate an upland area on the northeast portion of the parcel to provide compensatory storage for flood storage losses realized from the proposed site layout. In order to assess if this cubic yard for cubic yard approach is appropriate at this site, it requires more information such as a cut/fill analysis including cross sections through the site to more fully understand how much and where flood storage is lost. Depending on the results of the cut/fill analysis, further hydraulic and hydrologic modeling may be required to insure that it meets the No Adverse Impact (NAI) Standard, which essentially means that it must be demonstrated that there is no rise in base flood elevations or velocities under base flood conditions.

Other issues to be addressed in the application would be the underground fuel storage tanks. [Section 3.2](#) of FEMA's Principles and Practices for the Design and Construction of Flood Resistant Building Utility Systems (Nov. 1999) speaks to methods and practices of anchoring underground storage tanks in SFHA's and properly documenting. Additionally, any mechanical/electrical/heating/cooling components should be elevated above the BFE, water and septic systems include backflow/infiltration prevention, and any vent pipes elevated above BFE. Please let me know if you have any questions or would like to discuss further.

Respectfully,



Kyle Medash | Western Floodplain Manager

Vermont Agency of Natural Resources | Department of Environmental Conservation

7/1/22, 8:15 AM

Town of Richmond VT Mail - Richmond, VT Mobil Redevelopment

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From: Huseyin Sevincgil <hsevincgil@gpinet.com>

Sent: Wednesday, June 22, 2022 5:40 PM

To: Tyler Machia <tmachia@richmondvt.gov>; Ravi Venkataraman <rvenkataraman@richmondvt.gov>; Medash, Kyle <Kyle.Medash@vermont.gov>

Cc: tomf <tomf@sumd.com>; Jeremy Greeley <jeremy@rtmudge.com>; Cory Mason <cmason@gpinet.com>

Subject: Richmond, VT Mobil Redevelopment

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