



TRUDELL  
*Environmental Services*

November 3, 2020

Vermont Department of Environmental Conservation  
Watershed Management  
1 National Life  
Main Bldg., 2nd Fl.  
Montpelier, VT 05620

Subject: Wetlands Permit for Site Redevelopment for Richmond Mobil Station  
TCE Project #19-131

Dear Ms. Heath:

On behalf of Tom Frawley of Summit Distributing, LLC (240 Mechanic Street, Lebanon, NH) TCE is submitting a Vermont Wetland Individual Permit Application for Class II wetland buffer impacts associated with the renovation and modernization of the Mobil Station in Richmond, Vermont. The work includes: the relocation and addition of gas pumps; rebuilding a modern convenience store; expansion of the existing parking lot for safe circulation; retaining walls on the west and east sides of the pavement to minimize grading into the wetland; installing new subsurface fuel tanks; relocation of an existing stormwater discharge outlet; installation of a sub-surface grease trap; the removal of a mound created during the construction of the Interstate; and installation of a septic tank, pre-treatment tank, and pump station associated with the previously permitted wastewater system approved under Wetlands CUD 2016-150 and Water/Wastewater WW-4-0861-2.

TCE has worked with the Wetlands Program throughout the development of the project. The original delineation, conducted in August of 2019 by Brittany LeBeau and Karina Dailey, PWS, was confirmed on September 25, 2019. In February of 2020, TCE and Summit Distributing, LLC submitted a Wetlands Individual Permit for Single Wetland to approve Class II wetland and buffer impacts associated with directional drilling for a new wastewater system at 1436 W. Main Street. This permit (#2016-150) was issued on April 10, 2020. Following the issuance, TCE corresponded with the Wetlands Program about impacts surrounding the existing fill footprint of the Mobil station for confirmation of what is and isn't allowed regarding redevelopment within existing fill in a wetland buffer. At this time, it was realized that a miscommunication had occurred, resulting in TCE believing that redevelopment within existing fill in the wetland buffer did not require permitting and the wetland program not realizing that the project proposed a full redevelopment of the building, pumps, parking area, and utilities.

Correspondence occurred after this to ensure that the various aspects of the project moving forward would be permissible. This application proposes to permit all proposed redevelopment involving a material change within the buffer, however, as outlined in Section 6.12 of the Vermont Wetland Rules, areas of existing pavement which will not be substantially modified and will remain pavement have not been included in the

impact calculation. Wetland buffer impact areas are illustrated on the attached E2.02 Wetland Impact Plan.

Iterations of the Impact Plan have been shared, and feedback was provided that has allowed us to retrofit the development plan to minimize the Class II wetland buffer impacts to the greatest extent possible given the limited upland area on the property.

It is pertinent to note that the Town of Richmond requires any development within a flood zone to offset flood storage impact by creating flood storage in another area of the floodplain. To balance the project development and create a "net-zero" impact on flood storage, the project proposes to remove a mound constructed in the north-central portion of the parcel. This mound was created during the construction of the Interstate in the early 1960's and is proposed to be removed and restored to original grade. This necessary grade change results in 3,222 square feet of wetland buffer impact, however, will likely allow the wetland to expand in this area as it will be at grade with the surrounding wetland.

Please review the submitted information and determine if the proposed actions can be authorized under a Vermont Wetland Individual Permit Application. A copy of the Vermont Wetland Program Database Form and a check made payable to the "State of Vermont" is being mailed via USPS today.

Should you have any questions, please do not hesitate to contact me directly.

Regards,

A handwritten signature in black ink, appearing to read 'Brittany LeBeau', with a stylized, cursive script.

Brittany LeBeau  
Ecologist

cc: Summit Distributing

Enclosed: Vermont Wetland Permit Application; Wetland Impact Plan and Supporting Documentation.