

From: Medash, Kyle <Kyle.Medash@vermont.gov>
Sent: Tuesday, February 01, 2022 3:16 PM
To: Scott Gustin <SGustin@burlingtonvt.gov>
Subject: RE: 48 Sunset Cliff application

[WARNING]: This email was sent from someone outside of the City of Burlington.

Hi Scott,

Thank you for the application for review. When reviewing under the SFHA Regs, the requirements are vague since this proposal does not involve a “structure” and structures are mainly what the FEMA standards are focused on. At a minimum, the project should be meeting the standards for “All development” outlined in 4.5.4 (f) (8.) (C.). The majority of the proposed work is occurring above the BFE, and the parts that are below BFE can be considered an in kind replacement of the existing concrete seawall; therefore de minimis in terms of net fill on a large system such as Lake Champlain.

I agree that it would be preferable to move toward a more bio engineered design in most locations along the lakeshore. This proposal does seem like a reasonable solution though considering they plan on keying into ledge and existing concrete seawalls on each side, and are positioned at a unique angle along the shoreline compared to other properties (not sure if this makes it more or less erosion prone at this specific site). If the surrounding properties were utilizing a more natural shoreline stabilization approach, or if this wall was going to create a new encroachment diverting waves on an adjacent natural shoreline and potentially cause new erosion, I’d likely push back for a design that works best with the surrounding landscape. Happy to support you if you do have concerns I’m not seeing, just let me know and we can discuss.

As always, other State, Federal or local permits may be required for this project. These comments are offered in accordance with 24 VSA §4424. Please let me know if you have any questions or would like to discuss further.

Respectfully,



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