

Gott, Catherine

From: Sandra Vitzthum <svitzthum@proton.me>
Sent: Tuesday, July 28, 2026 1:00 PM
To: Act250 - Board
Subject: flood hazard areas in Tier 1 mapping
Attachments: floodplain houses.docx

Categories: Catherine

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Dear Chair Hurley,

I am a longtime architect who also does urban planning based in Montpelier. I have been following the evolution of CVRPC's map and am in touch with other regional planning commissions.

I am truly concerned about both the mapping of flood hazards and the methodology for classifying development in those hazard areas. While the VAPDA methodology is open to interpretation about "infill" in growth areas (between designated downtowns and rural), it seems the RPC consensus is to exclude those parcels from exemption. I was glad that Christian Meyer proposed an intermediate zone, "Resilience zone," but I fear that does not go far enough.

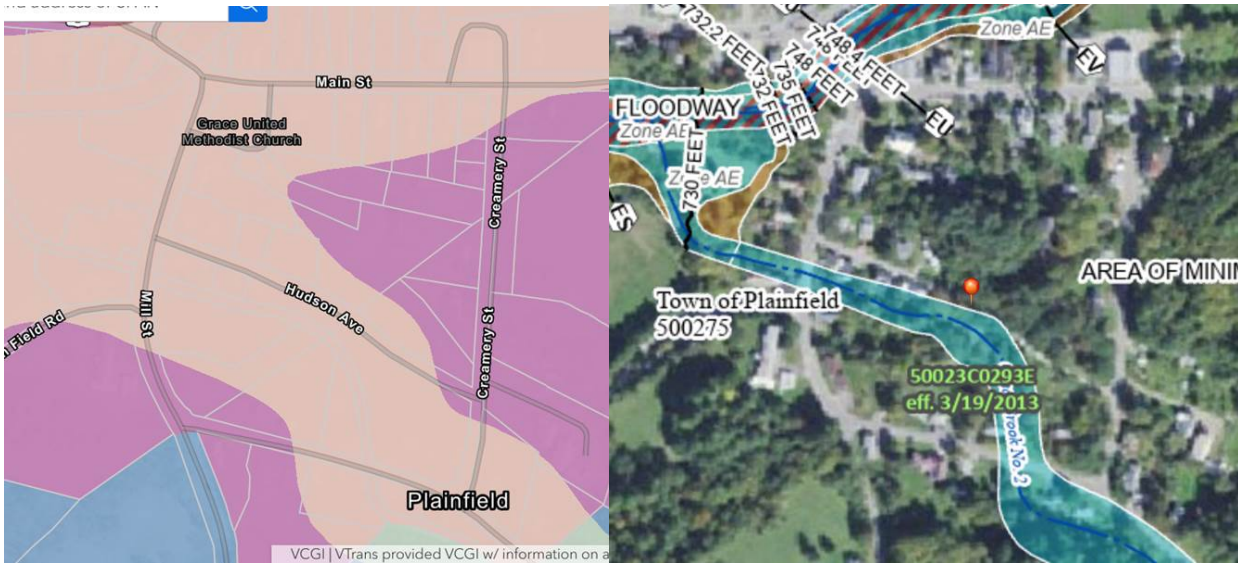
Before I explain why I feel that way, I want to ask about procedure. I have checked with ACCD, and it seems they have no voice in this. It sounds like LURB has exclusive jurisdiction, and the only way I as a citizen can register concerns is through the input process? I am deeply concerned that as the mapping continues, your public process will be too late to make a high-level comment that will be useful.

So is there a way that, as a single person, I can reach you and your board earlier?

Here is my concern: As you know, something like 3% of Vermont is settled area with infrastructure that is located in wet areas with flood hazard. Yet this land is key for redevelopment and even new development: it has ready access to sewer, and it's pedestrian friendly. There are areas in Montpelier, Barre, Plainfield, Randolph, Waterbury... pretty much every town and village I can think of. These areas can be exempt if they are in designated downtowns, but they are likely to be excluded immediately outside that boundary.

Beyond that, exclusion seems to be extending out well beyond actual floodways or corridors (Zone AE for FEMA) into flood plains. In many areas of the United States, floodplain construction is permitted, even encouraged, as long as it complies with FEMA standards (see the attached sheet).

This compares the Housing Exemptions Map of ACCD's VT Planning Atlas with FEMA maps at Hudson Ave in Plainfield. The difference affects many parcels.



I would like to suggest this approach for municipalities with flood hazard regulations and/or projects getting an ANR permit:

- 1) **Designated downtowns/villages:** Within the FEMA AE zone, focus on redevelopment of existing buildings. New construction should have detailed review if it's permitted at all.
- 2) **Tier 1 exemption areas, meaning existing or eminent sewer service and pedestrian access:** Within the FEMA AE zone, snap to property lines in favor of exemption. During project review, new development can be prohibited in the FEMA AE zone itself by local or state regulation. (No need to trigger Act 250.)
- 3) **½ mile buffers:** Within the FEMA AE zone, same as #2.
- 4) Tier 1 development should be allowed anywhere outside the AE zone, including the 100-year flood plain (aqua color code on the FEMA map), as long as it follows FEMA standards.

I understand that the overall Tier 1 process is supposed to be local up, but in practice I have seen the State and LURB restrict towns as they try to get designations like Neighborhood Development Areas. It seems critical to get everyone on the same page early.

Thank you!
Sandra

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