



**TOWN OF RICHMOND**  
**RICHMOND TOWN CENTER**  
203 Bridge Street, P.O. Box 285  
Richmond, Vermont 05477



December 16, 2024

Terry Purcell  
Operational Section Supervisor (he, him)  
Vermont Department of Environmental Conservation  
Watershed Management Division, Stormwater Program  
Davis 3, 1 National Life Drive  
Montpelier, VT 05620-3522  
[terry.purcell@vermont.gov](mailto:terry.purcell@vermont.gov)

Dear Mr. Purcell,

We write to clarify the Town of Richmond's intent in filing the attached Notice of Intent under Permit #6116-9050. The Agency should know that the Town only owns a minority of the impervious surface area covered by the permit. The Town has not taken full legal responsibility for the stormwater system covered by this permit, nor does it have the ability to do so since it lacks sufficient property rights, like easements, to access, much less to improve, maintain, or repair, stormwater treatment practices that would be required by this permit. In other words, the Town does not have full legal responsibility for the stormwater treatment infrastructure covered by the permit, and roughly half, or more, of the impervious surface area covered by the permit is privately owned. As a result, the Town should not be considered the sole permittee. There are roughly 48 separate, privately owned parcels of land with impervious surface area subject to coverage under the permit.

Sincerely,

Josh Arneson  
Richmond Town Manager