

Sandra Vitzthum, Architect, L.L.C.

14 Loomis Street Montpelier, Vermont 05602 (802) 223-1806

April 29, 2026

Members of the Legislative Committee on Administrative Rules
State House, 115 State Street
Montpelier, Vermont

Dear Members of LCAR,

Tomorrow you will be considering wetlands rule changes. I have been following the process and believe they will encourage housing construction.

There is one ambiguity that would benefit tremendously from two added words. Stormwater detention and management typically need to be located below a new home, driveway, and impervious surfaces. So if stormwater detention is not allowed in the 25-50 ft buffer, then improvements are effectively impossible in that area. I spoke with senior management at ANR yesterday, they said the current language is open to interpretation.

Currently Section 6.26 reads:

“Construction of residential housing projects and related required utilities, including draining, dredging, filling, grading, or vegetation clearing that meet the requirements of this subsection.”

I hope you will recommend changing the language to:

“Construction of residential housing projects and related required utilities, including draining, dredging, filling, grading, stormwater management, or vegetation clearing that meet the requirements of this subsection.”

Thank you very much for your time and consideration.

Sincerely yours,



Sandra Vitzthum