



Town of Williston
7900 Williston Road
Williston, VT 05495
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1763
•
Public Works
(802) 878-1239

February 11, 2025

Senate Committee on Natural Resources and Energy
115 State Street
Montpelier, VT 05633

Dear Senator Watson, and Members of the Committee on Natural Resources and Energy,

The Town of Williston Department of Public Works has reviewed S.29 on the topic of Conservation and Development; Transportation; Water Quality; and Salt Application. In consideration of the proposed language, we respectfully submit the following comments for your review:

- 1. Certifications should be based on demonstrated skills and competencies, rather than a simple pass/fail testing system.**
Rationale: This would ensure that certifications are meaningful and reflect a professional's actual capabilities.
- 2. The proposed bill does not clarify why the Vermont Department of Transportation (VTrans) would be exempt from the requirements. In the absence of clear and justifiable reasons, we recommend that VTrans not be exempt from these provisions.**
Rationale: We seek transparency and fairness in the application of the bill's requirements across all entities.
- 3. Similarly, it is unclear why VTrans projects would be exempt from the proposed bill. Without clear and reasonable justification, we urge that VTrans projects also be held to the same standards as other projects under the bill.**
Rationale: Ensuring consistency and equity in the application of the bill is critical for its success.
- 4. Certifications should be valid for a minimum of three (3) years, with a preference for a validity period of five (5) years.**
Rationale: Longer certification periods can reduce administrative burdens while ensuring ongoing competency.
- 5. Municipalities should have the option to designate a master salt applicator. The current language appears to exclude municipalities from this option, and we believe it is important to include them.**
Rationale: Municipalities are key stakeholders in salt applications, and they should be empowered to designate qualified professionals.



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6. **We recommend removing the requirement to document weather conditions at the time of salt or salt alternative application. Weather conditions are not a reliable indicator of salt need; instead, site and surface conditions should be the primary factors in determining when and how much salt to apply.**
Rationale: Focus on more relevant factors to ensure appropriate salt application practices.
7. **Regarding the importation of salt, does the committee intend to include retailers such as Home Depot, Lowe's, Ace Hardware, etc., in the determination of the total amount of salt being brought into the state?**
Rationale: Retailers distribute a significant amount of salt, so if the intention is to understand the amount of salt applied to surfaces across the state of Vermont, excluding this source of salt would omit a significant source of salt.
8. **The bill states that certified applicants will not be liable for damages. However, municipalities are protected by sovereign immunity. If a municipality is not certified, will it be exposed to liability under this bill?**
Rationale: This question seeks to clarify the relationship between municipal immunity and certification requirements.

Sincerely

Christine Dougherty
Assistant Director Public Works


Bruce Hoar
Director Public Works

Cc: Erik Well, Town Manager
Lisa Cicchetti, Stormwater Coordinator