



Christopher Kinnick
Compliance and Enforcement Officer
State of Vermont - Natural Resources Board
10 Baldwin Street
Montpelier, VT
05633-3201

December 14th 2023

RE: Proposed Civil Citation #2023_104

As the Burr and Burton Academy (BBA) Director of Facilities who is responsible for permits and construction projects I object to the proposed civil violation for the following reasons;

1. The permit was approved and the project was ultimately completed in good standing
2. The project removed an unsafe garage that was falling down with an impermeable roof and added a permeable parking lot at great expense to BBA (it would have been much less expensive to pave the parking lot with typical non-permeable asphalt). The project increased the permeable area.
3. The garage was knocked down and the lot was created months after the permit was submitted.
4. The Permit was submitted in good faith expecting a couple months of review turnaround. The original permit was responded to with 18 items that required additional information that were extensive and far reaching. The states historic review dept. extensively delayed the resubmission.
5. The state's historic review department took several months to ultimately reply that the project did not have historic requirements (as expected and originally submitted). We responded to the Act 250 questions within a couple of days after receiving the info required from the state.

BBA takes pride in our community and are committed to being good stewards of our land. We ultimately took a house that had animals living in it which was falling down, invested over 1 million dollars into it to create an international student dorm house along with improving the lot for the neighborhood. BBA along with our Civil Engineer (Long Trail Engineering) Frank Parent completed the project based on the approved permit and drawings.

Our goal is to continue to have a great relationship with the Town of Manchester and the State of Vermont. This feels unreasonable for a violation that ultimately was out of our control especially based on our history with the State. We could not have foreseen the delay with the state's historic review office. Further knocking down the unsafe garage was the right thing to do and installing a permeable parking lot increased the permeable area for water runoff.

Thank you. – Eric

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