

GROTON CONSERVATION COMMISSION

Minutes

Tuesday, March 10, 2015

Chairman John Smigelski called the meeting to order at 7:00 p.m. with Peter Morrison (Vice Chairman), Susan Black (Clerk), Rena Swezey, Mary Metzger, Marshall Giguere, and Bruce Easom present. Conservation Administrator Takashi Tada was present.

7:00 p.m. – Public Meeting: RDA, Cow Pond Brook Road, Lot 4 (R.D. Kanniard Homes, Inc.)

Applicant: Roger Kanniard, R.D. Kanniard Homes, Inc.

Representative: Stan Dillis, Ducharme & Dillis Civil Design Group, Inc.

Site Walk Date: 3/7/2015

Stan Dillis presented the Request for Determination of Applicability (RDA) on behalf of the applicant. He provided a copy of the applicant's correspondence with the Massachusetts Division of Fisheries & Wildlife, Natural Heritage & Endangered Species Program (NHESP). The property is located within mapped habitat of rare species, and the applicant must follow the requirements outlined in NHESP's "Conditional No Take" determination letter dated 10/15/2014.

The RDA is for a small portion of the revised driveway layout on Lot 4, Cow Pond Brook Road (Assessors Parcel 249-59.1). The original driveway layout was outside of any Buffer Zone. However, at the request of the Groton DPW Director/Tree Warden, Tom Delaney, the driveway layout was revised to utilize an existing cart path in order to preserve trees along the Scenic Road right-of-way. No mature trees will need to be cut for the revised driveway, but approximately 190 square feet of the revised driveway entrance will be located within 100 feet of the Bordering Vegetated Wetland (BVW) across Cow Pond Brook Road (west side of road).

P. Morrison asked about the percentage of disturbance within Buffer Zone as a result of the driveway. Mr. Dillis said approximately 30 percent of the entire 4-lot subdivision is within Buffer Zone of large wetland complex to the east; but all of the proposed disturbance is outside of Buffer Zone except for the small portion of revised driveway mentioned above (190 square feet). This amounts to less than one-tenth of one percent. B. Easom asked about the conditions required by NHESP. T. Tada read the conditions from NHESP's letter.

Upon a motion by M. Giguere, seconded, it was

VOTED: to issue a Negative #3 Determination for the proposed driveway on Cow Pond Brook Road, Lot 4, subject to the following two conditions:

1. Incorporate NHESP requirements by reference.
2. Make note of request by DPW Director to revise the driveway layout.

The motion was approved unanimously.

Moving on to General Business, the Commission considered a plan change request for the septic repair project at 61 Ridgewood Avenue, DEP #169-1111. The Commission issued an Order of Conditions (OOC) last year. Stan Dillis described the proposed change on behalf of the applicant, Thomas Doyle. The revised plan is to locate all of the septic components on the same side of the road as the existing house. The plan of record had the leaching chambers on the other side of Ridgewood Avenue, which bisects Mr. Doyle's property. The location of the proposed shed across the road from the house is unchanged. Moving the leaching area will preserve six mature trees that would otherwise need to be removed. The septic tank will be moved slightly closer to the pond, but within the approved limit of work. M. Giguere asked if the change will require additional grading. Mr. Dillis said grading will be required in the revised tank location; the proposed grading is 3:1.

Upon a motion by B. Easom, seconded by M. Giguere, it was

VOTED: to accept the revised plan dated 2/24/2015 as a minor change to the OOC for 61 Ridgewood Avenue, DEP #169-1111. The vote was unanimous. Stan Dillis will provide a copy of the revised plan after it is approved by the Board of Health.

7:15 p.m. – Public Hearing (cont'd): NOI, Old Ayer Road (MacGregor) – DEP #169-1121

Applicants: Nancy & Roy MacGregor

Representative: Stan Dillis, Ducharme & Dillis Civil Design Group, Inc.

Site Walk Date: 3/7/2015

T. Tada mentioned that the NOI plan had been revised to include a listing of the construction sequence. B. Easom indicated that his wife has bought hay from the MacGregors in the past; therefore he recused himself and left the room.

Stan Dillis presented the proposed single family house project on Old Ayer Road (Assessors Parcel 221-1). The property is located across from the MacGregor's Maple Shade Farm and has been previously disturbed for agricultural use; the proposed house is for their son to live in. The property contains Riverfront Area and BVW. James Brook flows roughly parallel to Old Ayer Road through the western part of the site. There is an existing, unpaved driveway providing access to the site off Old Ayer Road. The driveway crossing of James Brook consists of two 30-inch corrugated metal pipes and a substantial concrete headwall structure. The plan is to improve the existing driveway with pavement and stormwater controls. Work within the Riverfront Area and Buffer Zone of BVW includes grading of the existing driveway, proposed drainage swale along the driveway, and two separate stormwater recharge areas. Mr. Dillis said the finished driveway will be "super-elevated" to achieve the desired drainage. An Operations & Maintenance Plan for the stormwater controls was submitted along with a Riverfront Area alternatives analysis. The proposed house, drilled well, and septic system are all located outside of Riverfront Area and Buffer Zone.

Commissioners expressed general support for the proposal, which will improve the existing conditions of the site. The unpaved driveway currently drains directly to James Brook and the

BVW. M. Giguere said the project appears to meet the performance standards for work within Riverfront Area and Buffer Zone under the state law and local bylaw.

Upon a motion by M. Giguere, seconded by R. Swezey, it was

VOTED: to close the public hearing for Old Ayer Road, DEP #169-1121. The vote was unanimous.

Moving on to Meeting Minutes approval, the Commission reviewed draft minutes from 11/25/2014 and 2/24/2015. There was no discussion on the 11/25/2014 minutes.

Upon a motion by P. Morrison, seconded by B. Easom, it was

VOTED: to approve the minutes of 11/25/2014 as written. The vote was 4 in favor, with three abstaining (Swezey, Black, Giguere).

On the 2/24/2015 minutes, M. Giguere requested that they be amended to include his mention of the separate appeals processes associated with permits issued under the Massachusetts Wetlands Protection Act and the Groton Wetlands Bylaw. Appeals under the state law are referred to MassDEP, while appeals under the Bylaw go to Superior Court.

Upon a motion by P. Morrison, seconded by B. Easom, it was

VOTED: to approve the minutes of 2/24/2015 as amended. The vote was unanimous.

Moving on to the Pipeline Working Group Committee updates, P. Morrison reported that his first act as the new Chairman of the Pipeline Committee was to cancel the last scheduled meeting. The committee has not met in a while and he is not aware of any new developments on the pipeline front. B. Easom asked where the Tennessee Gas Pipeline stands as far as the Federal Energy Regulatory Commission (FERC) review process is concerned. The pipeline proponent (Kinder Morgan Energy Partners) is still in the “pre-filing” process and has not submitted a full application to FERC.

On the topic of Community Preservation Committee (CPC) updates, B. Easom reported that the CPC had no issues with recommending the Commission’s Conservation Fund allocation request to Town Meeting.

7:30 p.m. – Public Hearing (cont’d): NOI, Septic Repair, 69 Boathouse Road (Chapman) – DEP #169-1122

Applicant: Matthew Chapman

Representative: Stan Dillis, Ducharme & Dillis Civil Design Group, Inc.

Site Walk Date: 3/7/2015

Stan Dillis presented the revised plan to install a conventional septic system for the existing house at 69 Boathouse Road, on Lost Lake. The original plan submitted with the NOI was for a tight tank with grinder pump; however the Board of Health requested a conventional system design. The house is currently served by a failed cesspool. The proposed leach field will be located in a level area just off Boathouse Road and will consist of concrete leaching galleys surrounded by crushed stone, with an impervious polyethylene barrier on the downgradient side. The proposed septic tank/pump chamber will be located between the existing house and shed. Due to the steep terrain from the road down to the house/shed, the plan calls for a plastic tank, rather than concrete. A concrete tank would be too heavy to maneuver into place. Mr. Dillis said it would be up to the contractor to determine how to excavate for the tank. It may require hand digging if unable to get a mini-excavator down to the tank site.

M. Giguere asked if the excavation work could be completed before the lake returns to its seasonal high water (SHW) level. Mr. Dillis said all of the proposed work is above the SHW elevation and there should be enough room to operate regardless. M. Giguere also noted the logistical difficulties associated with accessing the proposed tank site. He stressed the importance of requiring a pre-construction conference. B. Easom concurred with the pre-construction requirement and asked about the separation between the tank bottom elevation and the water table. Mr. Dillis said they had 2 feet of separation. P. Morrison said it would be very challenging to get an excavator down to the tank site. He wondered if a long-reach excavator could be a more viable option. Mr. Dillis said it would be preferable; however he did not think Boathouse Road is wide enough to accommodate such a large equipment footprint.

Upon a motion by P. Morrison, seconded by B. Easom, it was

VOTED: to close the public hearing for 69 Boathouse Road, DEP #169-1122. The vote was unanimous.

Moving on to Land Management issues, M. Metzger reported that she will be working with the volunteer steward of the Knowles Siding Conservation Area, Richard Covenov, to help maintain the meadow area and control invasive vegetation. Mr. Covenov mows the path and submitted a property report in April 2014. M. Metzger said she thought this was an ideal place to establish a pollinator meadow, given the presence of nearby agricultural fields.

On the topic of Forest Cutting Plan – Casella Realty Trust, T. Tada provided a copy of the Forest Cutting Plan prepared for the Casella Realty Trust (Assessors Parcels 227-117, 227-117.1 and 229-58) as well as the comment letter he submitted on the Commission's behalf to the Department of Conservation and Recreation (MassDCR) District Forester, Laura Dooley. The letter points out various problems with the cutting plan. The plan proposes to cut up to 80% of the basal area in the stands identified on the stand map. However, the entire site is located within rare species habitat as mapped by NHESP, and there are extensive wetlands. The cutting plan does not acknowledge the rare species habitat and does not indicate any of the required forestry Best Management Practices (BMPs) such as skid trails, wetland crossings, buffer strips, etc. Under the Forest Cutting Practices Act (MGL Ch. 132), Conservation Commissions have only 10 days to submit comments on a forest cutting plan to the MassDCR District Forester. It is up

to the District Forester to forward the plan to NHESP if the property contains rare species habitat. T. Tada spoke with Ms. Dooley and she confirmed that a copy was provided to NHESP. She said the cutting plan could not be approved by NHESP or MassDCR in its current state, and the applicants would be given the opportunity to revise the plan per the state's recommendations.

Moving on to Open Session items, R. Swezey mentioned that the owners of the two West Groton parcels that about the Senior Center and former Sportsmen's Club remain interested in selling the property to the Commission. Last July the Commission made an offer to the owners, David & Martha Harvey, based on an independent appraisal value of \$77,000. At that time the Harveys declined the offer. R. Swezey said she was recently in contact with them and they indicated an interest in seeing the land preserved. She will follow up with the Harveys and invite them to talk with the Commission.

7:50 p.m. – Public Hearing (cont'd): NOI, Baddacook Pond Herbicide Treatment (Board of Selectmen) – DEP #169-1123

Applicant: Board of Selectmen (Selectmen)

Representatives: Great Pond Advisory Committee (GPAC); Aquatic Control Technology (ACT)

Chairman Smigelski opened the public hearing continuation and acknowledged a request by Jim Luening of GPAC to record the proceedings. There were no objections. T. Tada summarized the major issues/questions that were discussed during the previous hearing. B. Easom remarked that it would be helpful to keep the punch list going as the hearing continues.

M. Giguere asked about the establishment of Great Ponds in Massachusetts under the Colonial Ordinances, and how this fits in with the Board of Water Commissioners' (BOWC) claim of ownership/control of water rights in Baddacook Pond. Water Commissioner Jim Gmeiner said that the former Groton Water Company was granted ownership/control of the water by an act of the Massachusetts Legislature. T. Tada asked if the BOWC could provide the documentation of this legislative act, for the public record. Mr. Gmeiner said they would provide this. M. Giguere also pointed out that the Commission would not close the public hearing until comments from NHESP are received. He also noted that the comments from MassDEP regarding the Drinking Water Program's Zone I policy seem to indicate that there is a way around the prohibition of pesticide use within a Zone I. He further mentioned the health risk assessment information provided by Susan Horowitz of the Board of Health, which corroborates the comments from MassDAR on the safety of Sonar (fluridone) herbicide. Finally, M. Giguere asked if MassDEP might have any recommendations for isolating the Zone I portion of the pond in order to allow the use of Sonar in the Zone II.

S. Black and M. Metzger asked for clarification of the flow patterns within Baddacook Pond. Bill Strickland of GPAC said there are two stream inlets on the west side of the pond, and there is one stream outlet on the east side. M. Metzger said she was an organic gardener and is generally skeptical of chemical use. However, she would use chemicals to get rid of termites in her house, if necessary. She said the weight of scientific evidence presented during this hearing is strongly in favor of the applicants' contention that Sonar is safe to use as proposed. Sonar

works by disrupting chlorophyll in plants; humans don't have chlorophyll. She further stated that the basis of the BOWC's concerns is unclear. She also suggested using benthic mats instead of Sonar within the Zone I as a way of controlling the invasive plants without herbicides in this area.

R. Swezey asked the BOWC if they have talked with the Town of Littleton's Water Department about their experience treating Spectacle Pond with Sonar. BOWC Chairman Gary Hoglund replied that Spectacle Pond is not a good comparison because it is a flow-through pond, whereas Baddacook Pond is much more stagnant. He said the BOWC is uncomfortable with the testing protocols that are used to monitor Sonar treatments, and he said most of the baseline studies are 30 years old. He further stated that the BOWC's perspective is that there are too many questions and unknowns associated with Sonar use.

Mr. Luening noted that the most recent assessment of Sonar herbicide by the US Environmental Protection Agency (USEPA) occurred in 2004. He also mentioned that he was seeking clarification from MassDEP as to whether the use of Sonar in a Zone I is strictly prohibited or if it can be done with permission from the MassDEP Drinking Water Program. Chairman Smigelski wondered how the Town of Littleton was able to do it. Art Prest of the Groton Lakes Association (GLA) pointed out that the Littleton Water Department supported the use of Sonar. Mr. Hoglund restated the BOWC's opposition to the use of Sonar in Baddacook Pond. Mr. Prest reiterated that the GPAC and GLA have submitted an abundance of credible scientific evidence to support the safe and effective use of Sonar. He further reminded that the USEPA approves the use of Sonar in drinking water reservoirs.

P. Morrison asked if the BOWC is opposed to the use of benthic barriers. Mr. Hoglund said they were not opposed, fundamentally, to benthic barriers but would want more information about them. M. Metzger clarified that she would consider the use of benthic barriers only within the Zone I, not across the whole pond.

B. Easom asked if GPAC, on behalf of the Selectmen, would be willing to seek permission from MassDEP to apply Sonar in the Zone I. He said he would like to force MassDEP to weigh in more definitively on this issue. Mr. Luening said he would take this on. M. Giguere reminded the gathering that there are multiple permissions and hurdles that need to be cleared for the proposed project to go forward, irrespective of the Commission's decision.

Mr. Gmeiner emphasized that the BOWC is beholden to the water rate payers and has an obligation to ensure the cleanest water possible.

Susan Horowitz, member of the Board of Health and GPAC, said that benthic barriers were tried in Lost Lake and were found to be ineffective, expensive, and dangerous to install/maintain. She also stated she is a water rate payer and would have no problem with drinking water treated with Sonar.

M. Giguere asked the Water Department about the percentage of water supply from each of the Town's two main supply wells, Baddacook Well and Whitney Well. Water Superintendent Tom Orcutt said it varies according to seasonal demand. Generally speaking, he said they pump

Whitney #1 during summer peak demand, while Whitney #2 and Baddacook are pumped at other times. He agreed to provide a more detailed breakdown of water supply demand to the Commission. M. Giguere followed with a question about the possibility of taking Baddacook Well offline during herbicide treatment. Mr. Orcutt indicated it would be difficult.

Mr. Gmeiner took issue with the draft meeting minutes covering the previous public hearing on 2/24/2015, specifically the summary of the Groundwater Policy Education Project leaflet he provided during that meeting. The leaflet discusses the movement of chemical contaminants, nutrients, and pathogens through soil and into groundwater. It classifies contaminants in soil according to persistence (i.e. half-life) and Partition Coefficient (i.e. the ratio of the chemical concentration that is bound to soil particles versus the concentration that is dissolved in the water in-between the soil particles). It classifies Sonar as persistent in soil (half-life of 360 days) with a Partition Coefficient of 450. The leaflet does not discuss the movement of contaminants from surface water to soil. The author of the leaflet is Arthur G. Hornsby, University of Florida. Mr. Gmeiner expressed his view that the draft minutes incorrectly describe the Partition Coefficient of Sonar in soil as “relatively high.”

Mr. Gmeiner also addressed the issue of using Littleton’s Spectacle Pond as a case study. He suggested a better example to look at is monitoring done during the treatment of Lost Lake/Knops Pond done in 2013. He pointed out that Sonar was detected in surface water in Whitney Pond, downstream of the Lost Lake/Knops Pond dam.

George Barringer, resident on Fox Run and member of the Planning Board, asked about the 2004 study by the USEPA Mr. Luening referred to. It was clarified that the USEPA re-approved Sonar herbicide in 2004 as part of its periodic review of herbicide registrations.

B. Easom asked for a rundown of the punch list. T. Tada indicated the following:

1. GPAC to seek permission from MassDEP to apply Sonar in the Zone I.
2. BOWC to provide documentation of the act of the legislature granting ownership of the water in Baddacook Pond, a Massachusetts Great Pond.
3. NHESP to provide written determination letter by the end of the week.
4. Seek recommendation from MassDEP for mitigating and/or isolating the Zone I portion of the pond, if Sonar is applied in the rest of the pond (GPAC or T. Tada).
5. GPAC to pursue a Special Permit from the Plannin Board under the Water Resources Protection District provisions of the Town of Groton Zoning Bylaws. See memo from the Planning Board dated March 6, 2015.
6. T. Tada to pursue additional information on the Great Pond ownership question.
 - a. Mr. Hogle reitared the BOWC’s claim of ownership of the water rights only. They do not claim to own the Land Under Water.
7. Water Department to provide summary of supply well production (Baddacook Well versus Whitney Wells).

Upon a motion by P. Morrison, seconded by B. Easom, it was

VOTED: to continue the public hearing for Baddacook Pond NOI, DEP #169-1123, to 3/24/2015. The vote was unanimous.

Moving on to other Open Session items, Chairman Smigelski brought up the issue of speaking to “the press” (newspaper reporters, news bloggers, etc.). He said he was contacted by a reporter from the Lowell Sun; others Commission members said they were contacted as well. Chairman Smigelski suggested referring all inquiries about the Commission’s business to T. Tada, and inviting attendance at our regular open meetings. Also, the posted minutes contain a public record of the Commission’s affairs. B. Easom reminded Commissioners that everyone is entitled to speak to the press as an individual, but not for the Commission as a whole.

Going back to the topic of the Commission’s application to the CPC for replenishing the Conservation Fund, M. Metzger urged the Commission to prepare a presentation for the upcoming Annual Town Meeting on April 27th. The presentation should explain the benefits of maintaining the Conservation Fund and head off some of the anticipated criticisms from the “active recreation” community. As an example of such criticism, she provided a copy of an editorial by Tim Svarczkopf, member of the Planning Board and the Hazel Grove Agricultural Association. The letter was posted on the “Groton Line” blog in May 2014, in response to last year’s CPC application. Although filled with numerous factual errors, misrepresentations, and emotional invective, the letter does exemplify the types of questions and criticisms that have come up in the past, and are likely to be raised again. M. Metzger said the Commission needs to show how the Commission’s land protection decisions are grounded in the Open Space and Recreation Plan (OSRP) and designed to meet the OSRP’s goals and objectives, such as protection of habitat for biodiversity as identified in NHESP’s BioMap2. She prepared a draft writeup of points that the Commission can make in its presentation to Town Meeting. T. Tada will compile a draft slide presentation for the Commission to review.

There being no further business, upon a motion by P. Morrison, seconded by R. Swezey, it was

VOTED: to adjourn the meeting at 9:15 p.m. The vote was unanimous.

Notes taken by

Takashi Tada
Conservation Administrator

Exhibits on file at Conservation Commission Office:

1. NOI, Baddacook Pond Herbicide Treatment (Selectmen), DEP #169-1123
 - a. WPA Form 3, Notice of Intent
 - b. Assessors Map
 - c. USGS Locus Map
 - d. Project Description

- e. Notification to Abutters
 - f. Certified Abutters List
 - g. Copy of MESA Filing Fee Check
 - h. “Baddacook Pond Baseline Survey 2011”, prepared by ACT, dated 7/2011.
2. Supporting Documents, Baddacook Pond NOI:
- a. GPAC PowerPoint Presentation (J. Luening)
 - b. MassDCR Rapid Response Plan For Fanwort, prepared by ENSR
 - c. Baddacook Well Zone I – map figure provided by GPAC
 - d. Material Safety Data Sheet for SePRO Sonar herbicide (fluridone)
 - e. Sonar fact sheets, compiled by GLA
 - f. Article re: drowning in Framingham, MA
 - g. USDA-NRCS Soils Maps for Baddacook & Spectacle Ponds
 - h. Baddacook Well MPA Testing Results, provided by MassDEP
 - i. Letter from SePRO’s Regulatory Affairs Manager, Laurent C. Mézin, dated 2/23/2015.
3. Comments & Responses To Comments on the Baddacook Pond NOI:
- a. BOWC Memorandum to BOS *et al*, dated 1/28/2014, re: Sonar (fluridone) Application at Baddacook Pond.
 - b. Response to BOWC titled, “Restoration & Revitalization of Baddacook Pond”. Prepared by A. Prest on behalf of the GLA, dated 2/10/2014.
 - c. BOWC Memorandum to BOS *et al*, dated 9/23/2014.
 - d. Response to BOWC titled, “Baddacook Pond Environmental Restoration – Answers to Water Commission Questions”. Prepared by GPAC.
 - e. Email correspondence from Hotze Wijnja, PhD., Environmental Chemist for MassDAR, dated 2/23/2014.
4. Additional information/comments presented during Baddacook Pond NOI public hearing, 2/24/2015:
- a. Groundwater and Public Policy Leaflet #2, “How Contaminants Reach Groundwater”. Prepared by Arthur G. Hornsby, University of Florida, for the Groundwater Policy Education Project. Copy presented by Jim Gmeiner, BOWC.
 - b. Article from the January 2015 issue of *Civil Engineering* magazine relating to cyanotoxins in drinking water. Copy presented by Val Prest.
5. Additional information/comments received between the 2/24/2015 public hearing and the 3/10/2015 public hearing on Baddacook Pond NOI:
- a. “Neponset Reservoir, Aquatic Vegetation Management Program, 2009 - Year End Report”, prepared by ACT. Final draft dated 12/30/2009. Copy provided by Jim Luening on 2/24/2015.
 - b. Legal opinion from Town Counsel David Doneski of Kopelman & Paige, P.C. Original email dated January 07, 2014. Forwarded by Tom Orcutt on 2/25/2015.
 - c. Photograph of Baddacook Pond outlet grate, taken by Jim Luening and provided via email, 2/25/2015.
 - d. Email from MassDEP re: issuance of File Number 169-1123 and comments on the NOI, dated 3/2/2015.
 - e. Email from Jim Luening to Board of Selectmen *et al*, re: hiring of outside consultant, dated 3/2/2015, with attachments:

- i. “Answers to Water Commission Questions”, prepared by GPAC, dated 3/1/2015.
 - ii. Copy of prior correspondence from Dr. Wijnja, MassDAR.
 - f. Email reply from Mary Metzger to J. Luening, dated 3/2/2015.
 - g. Email reply from Jim Luening to M. Metzger, dated 3/3/2015.
 - h. Email correspondence from J. Luening to Marielle Stone of MassDEP, dated 3/3/2015, with attachments:
 - i. Copy of USEPA’s 2004 reassessment of Sonar.
 - ii. Copy of full Sonar product label.
 - iii. Copy of MassDAR review of Sonar, “Appendix III – Fluridone”.
 - i. Planning Board Memorandum dated 3/6/2015 re: Notice of Intent for Sonar Application in Baddacook Pond.
 - j. Email reply from Robert Bostwick, MassDEP Drinking Water Program, to J. Luening, dated 3/9/2015.
 - k. List of drinking water reservoirs treated with Sonar, prepared by SePRO. Copy provided by J. Luening, 3/10/2015.
6. RDA, Cow Pond Brook Road, Lot 4.
7. Revised Plan, 61 Ridgewood Avenue – DEP #169-1111.
8. NOI, Old Ayer Road (MacGregor) – DEP #169-1121.
9. NOI, 69 Boathouse Road (Chapman – DEP #169-1122
10. Meeting Minutes, 11/25/2014 and 2/24/2015.
11. Forest Cutting Plan prepared for the Casella Realty Trust, prepared by Mel A. Harder, received 3/2/2015.
12. Comment letter to Laura Dooley, DCR Service Forester, re: Casella Forest Cutting Plan, dated 3/3/2015, prepared by T. Tada.

Approved 4/14/2015