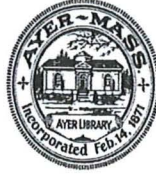


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TOWN OF AYER  
TOWN CLERK



## **Town of Ayer Conservation Commission**

Town Hall \* One Main Street \* Ayer, MA 01432 \* 978-772-8249

Minutes for 9/22/2022

Location: Ayer Town Hall, 1st Floor

Present: Jon Schmalenberger (Chair), Mark Phillips (Vice-Chair), George Bacon (Member), Jennifer Amaya (Member), Jessica Gugino (Clerk), Heather Hampson (Conservation Agent)

APAC taped: YES

### **7:00 PM – Open Meeting**

- **Confirmation of Agenda**

- G. Bacon moved to confirm the agenda as posted; M. Phillips 2<sup>nd</sup>.
  - Motion approved unanimously.

- **Approval of Meeting Minutes**

- G. Bacon moved to accept the minutes for 9/8/2022 as written; M. Phillips 2<sup>nd</sup>.
  - Motion approved unanimously.

- **Public Input**

- None received.

- **Public Hearing (cont'd.): Notice of Intent (NOI) -- Transmission Main Replacement, Spectacle Pond Water Treatment Plant, Ayer Department of Public Works (DPW), MassDEP # 100-0480**

- Assessor's Maps 24 & 17, Parcels 1 & 7 (project between Willow Road and Nemco Way)
- H. Hampson prepared a draft Order of Conditions (OOC) and has had it reviewed by Charles Gore, of Tighe & Bond.
  - Mr. Gore only questioned one Special Condition (#19), regarding washing vehicles to prevent the spread of invasives.
  - Commission members were in agreement that the condition should remain.
- G. Bacon moved to approve and issue the OOC for 100-0480; M. Phillips 2<sup>nd</sup>.
  - Motion approved unanimously and the OOC was signed.
- G. Bacon moved to close the Public Hearing for 100-0480; M. Phillips 2<sup>nd</sup>.
  - Motion approved unanimously.

- **Discussion: Conservation Recommendation to Planning Board for Stratton Hill OSRD Subdivision**

- Within the hour prior to the meeting, J. Gugino received a number of texts from resident Annie Reed, of Wachusett Avenue East, about the Conservation Recommendation to be discussed.
  - J. Gugino read the texts into the record so that she would not be the only recipient of their contents (see attached transcript).
- Regarding one of the texts about rainwater leaving Stratton Hill, during heavy rain events, and crossing Wright Road, J. Schmalenberger said the civil engineer for the project, Stan Dillis (of Dillis & Roy) had already said on a site walk that when the project was abandoned in 2008, the stormwater system was not, and still is not, finished.



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- M. Phillips said the runoff crossing the road needs to be addressed.
- G. Bacon said if runoff is having negative effects on Sandy Pond, the Commission can take action at any time to address that.
- H. Hampson said that her understanding was that stormwater would be addressed during construction, and is under the purview of the DPW and the Planning Board.
- Ken Diskin, as a member of the Planning Board, said that if the cause of the runoff is the roughed-in gravel road in Stratton Hill, the Commission should require the installation of wattles and haybales immediately, in order to close off the front of the site from the road.
- J. Gugino also gave Chair Schmalenberger a print-out of the email letter received from Annie Reed at 5:31 PM, an hour-and-a-half prior to this meeting's commencement (letter attached).
  - J. Schmalenberger said the Commission was generally not in the habit of entertaining information that came in that late.
- Review of existing draft Conservation Recommendation
  - J. Gugino said she had made changes to the recommendation paragraph on construction sequencing, and had also added the following new recommendation:
    - “Regarding the final disposition of the OSRD ‘Open Space’ – whether to the Town in a traditional Conservation Restriction, to Mass. Fish & Wildlife, or to another agreed-upon-party – the Commission recommends that the Planning Board require this disposition be as close to complete as reasonably possible prior to the commencement of work on the site.”
  - H. Hampson and M. Phillips asked for stronger language to make clear the Commission strongly recommends NO development north of the power lines/Right-of-Way (ROW).
  - In talking about the possibility for the redistribution of house lots from north of the ROW to its south, M. Phillips asked that the Recommendation state the Commission believes there is more than enough space south of the ROW to build an economically viable development without having to also develop north.
    - J. Gugino said that the Commission should not take a stance on encouraging more dense housing to the south of the ROW as neighborhood residents have voicing concerns to the Planning Board about such things as increased traffic impact.
      - For the record, J. Gugino is also a resident within the general Wright Road neighborhood.
  - On the question of whether the 2005 Conservation Management Permit (CMP) was still valid, a Zoom meeting has been scheduled for Monday morning, 9/26, with Lauren Glorioso, of NHESP (Natural Heritage & Endangered Species Program, the State issuer of the CMP), together with the Town Planner, Conservation Agent, and up to two members each from ConCom and the Planning Board.



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- This discussion will hopefully clarify the status of the CMP, given BSC Group peer reviewer Matt Burne's assumption that the CMP would have expired in 2012. (See 8/25/22 ConCom minutes)
- M. Phillips asked about whether the Recommendation should simply eliminate any reference to the possibility of development north of the ROW.
  - As far as currently known, there is also the risk that the developer could simply return to the original subdivision permit issued by the Planning Board in 2005, with its larger footprint; the developer has maintained that the 2005 permit is still valid should they choose to go that route.
  - Mr. Diskin clarified that one of the pages submitted in the 2022 preliminary plan application, showing many more house lots south of the ROW, was just a "yield plan," an exercise requested by the Planning Board, not a realistic design, and therefore not something that should be considered as viable.
  - J. Amaya said ConCom should leave in the reference to its preference of at least reduced number of lots and road changes north of the ROW if the Planning Board were to allow development there – so that ConCom would still have a voice on the matter.
- J. Gugino will incorporate the edits suggested into a revised Recommendation.
- Public Input
  - Anne Gagnon, of Mass. Fish & Wildlife, suggested the Recommendation be revised to support the use of Cape Cod berms throughout the subdivision, as opposed to the use vertical granite curbing that would impede the movement of turtles off the roadway.
    - Mr. Diskin said another option that might be considered is to super-elevate the road so that one side is higher than the other, avoiding the need for as much curbing.
  - M. Phillips asked whether the current draft Recommendation includes support for Dark Sky compliant lighting: J. Gugino will add that into the next draft.
  - Ms. Gagnon stated her appreciation that the Commission is supporting the disposition of the open space to Fish & Wildlife, as well as its request to the Planning Board that the disposition be completed prior to construction work.
    - Mr. Diskin said that an amended CMP will need to adjust the language so that it doesn't limit the disposition of the open space just to the Town.
- Annie Reed comments
  - Ms. Reed, who arrived to the meeting at 7:21 PM, was able to address her concerns directly to the Commission, including reading much of the email she had sent the Commission two hours prior:
  - In her view, it is premature for the Commission to submit a Recommendation to the Planning Board without retaining legal services to ensure that environmental permits are in place.
  - In her view, ConCom should follow all of the recommendations made by Matt Burne, of BSC Group, in his peer review.



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- In her view, more data needs to be collected – identification of specimen trees, habitat, wildlife corridors.
  - She said her comments were addressed specifically to those areas proposed for development on the parcel.
  - She referred to a stand of mature hemlocks, within the bounds of the existing loop road, and criticized the developer for seeking a waiver from the Planning Board in order to not have to survey trees.
  - J. Schmalenberger asked Ms. Reed for the specific citation in the BSC report that she was referring to.
    - Mr. Burne wrote (p. 20, “Peer Review of Conservation Analysis” (August 2022):
      - “Comment 19: BSC recommends that the Conservation Commission provide significant guidance on how to assess all of the data requested as part of the Conservation Analysis process or that ecological professionals be required to contribute (at least) to the final analysis and ranking.”
      - “Comment 20: ... Given the complicated nature of ecological evaluations that are the basis of the Conservation Analysis, BSC recommends that the Conservation Commission require a trained ecologist with suitable expertise and experience to certify the results of the procedures leading to the prioritization of conservation areas within a large development site.”
  - In Ms. Reed’s view, the Commission was ignoring Mr. Burne’s recommendations; in the Commission’s view, the draft Recommendation does not.
- Ms. Reed referred to Mr. Burne’s contention that the 2005 CMP has expired.
  - Ms. Reed acknowledged that she had heard Town representatives were meeting directly with NHESP the following week to address this question.
- Ms. Reed stated she did not think the Commission had the legal expertise to evaluate permitting matters.
- Chair Schmalenberger asked G. Bacon for guidance on the Commission’s ability to seek Town Counsel opinions.
  - Decisions about the use of Town Counsel must be arranged and approved through the Town Manager’s office.
  - G. Bacon said the question was whether this was in the Commission’s purview.
    - Currently, there is no formal application before the Commission related to Stratton Hill.
    - All the Commission is tasked with currently is providing the Planning Board with a Conservation Recommendation.



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- What the Commission can do, G. Bacon said, is pass recommendations on to the Planning Board regarding the seeking of additional professional ecological and/or legal expertise.
- Ms. Reed asked that the Commission make a formal request to have Town Counsel review the Stratton Hill documents.
- Ms. Reed referred to her comment on p. 3 of the Recommendation draft: “The commission can & should require retainment of a trained ecological professional to survey, collect, and quantify floral & fauna data for the southern portion of the parcel....”
  - Ms. Reed referred to the “Rules for Hiring Outside Consultants under G.L. Ch. 44 §53G,” adopted by the Commission effective May 11, 2017, and included as an attachment to her 5:31 PM email.
    - She argued this gave the Commission the authority to engage additional professional/expert services.
    - It was pointed out that this policy is applicable when an application is before the Commission pursuant to the requirements of the Wetlands Protection Act.
      - There is no application before the Commission on which it would have applicable jurisdiction under the Wetlands Protection Act.
- Regarding blasting, Ms. Reed said that the Commission should require that there be no further blasting on the site.
- Regarding the failure of the developer to, as yet, comply with the CMP’s requirement for the construction of two turtle nesting areas, one in Groton and one in Ayer, Ms. Reed said the Commission and the Planning Board should notify the State of this failure.
  - It was again noted that a meeting with the State (NHESP) was already scheduled for the following Monday.
- Ms. Reed stated that the 2018 Preservation Priority Report prepared by the Town, with the assistance of MRPC (Montachusett Regional Planning Commission), listed the Stratton Hill parcel as the #1 priority area for preservation in Ayer.
- Continuing discussion
  - Mr. Schmalenberger thanked Ms. Reed for expressing her concerns and the amount of effort she has made to do so.
  - Mr. Diskin thanked the Commission for all its work and said additionally that it would be a misunderstanding to think that Town Hall has not been looking at every aspect of this project and plans.
  - The Commission agreed that J. Gugino would incorporate various edits as suggested into a new revised draft that ConCom would revisit at its next meeting on Thursday, October 13.
    - Additional comments on the existing draft should be sent to J. Gugino by 9/30.



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- M. Phillips reiterated his support for having Town Counsel's opinion on the status of existing permits.
    - Mr. Diskin asked M. Phillips what specific permits needed looking at.
    - M. Phillips referenced the NHESP permit which Mr. Diskin said the Town Planner is working on.
    - Ms. Reed said that the Town Planner has not indicated that Town Counsel is involved and again asked that the Commission (and the Planning Board) officially request Town Counsel review.
      - Chair Schmalenberger said he would make a request.
  - Ms. Reed brought up the issue of her observance of stormwater leaving the Stratton Hill site during heavy rains, crossing Wright Road, then flowing down Standish Avenue, across a lawn, and into Sandy Pond.
    - Prior to her arrival at the meeting, J. Schmalenberger said the Commission had looked at the video Ms. Reed had sent to J. Gugino's cellphone.
      - He reiterated that the project was not done and also referenced Mr. Diskin's suggestion of haybales.
  - Ms. Reed began to refer to the alleged illegality of stormwater leaving a site, citing a conversation with H. Hampson weeks earlier, but H. Hampson cut her off and asked that her words not be used out of context.
    - H. Hampson has clarified that the control of stormwater is under the purview of the DPW and the Planning Board, and applies to an active construction site.
- **Conservation Commission Office and Member Updates**
    - Water & Wetlands 2022 Pond Management Program
      - H. Hampson said an email was received earlier in the day from Joe Onorato, of Water & Wetlands.
        - Because Sandy Pond is under an official Public Health Advisory – closed to swimming and recreation – Water & Wetlands cannot perform the scheduled treatment for overgrowth of water lilies and phragmites this year until the Advisory closing Sandy Pond has been lifted.
          - Currently Sandy Pond is undergoing a toxic blue-green algae bloom (cyanobacteria).
    - Town website
      - H. Hampson handed out a draft, for review, of a 'living with wetlands' brochure she wants to post to the ConCom webpage.
        - The possibility of also doing a mailing of this, included perhaps in the Town's water/sewer bills, was mentioned.
    - Tree policy
      - As other towns have done, H. Hampson is working on drafting a tree policy document to serve as a guideline to clarify and streamline the process when residents want to remove trees.



## **Town of Ayer Conservation Commission**

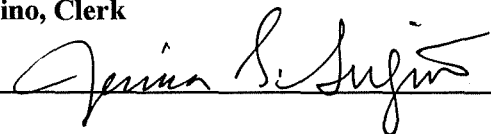
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- Ayer Solar II update
  - During site inspections, H. Hampson has been observing areas at the top of some slopes that are beginning to show signs of cracking.
    - This is in the area closer to the solar array itself and H. Hampson will keep monitoring to see if it becomes a problem.
  - Rohit Garg told H. Hampson that he would be talking to Oxbow Associates in the following week in order to get started on the wetland replication areas.
  - While compliance has improved, H. Hampson is still seeing areas where sediment is piling up against the face of haybale controls.
    - M. Phillips highlighted that one of the Special Conditions in the Solar II OOC mandates that a supply of extra haybales (minimum 15% of existing use) be maintained on the site.
    - Better communication with ConCom from the site also still needs to be worked on.
  - Ken Diskin, here as an abutter to the solar array, asked if ConCom was going to vote to accept changes made to the original plans by the contractor.
    - H. Hampson said it is not just a question of the Commission being informed of changes when the 'as-built' is eventually submitted; per the OOC, the Commission is supposed to be notified of significant changes **at the time** they are being considered.
      - Among other things, this would allow the Commission to evaluate whether an official amendment to the OOC might be necessary.
    - Meanwhile, the Commission cannot take any vote on accepting changes thus far because the requested list of changes has still not been provided.
  - Mr. Diskin also noted that there has still not been any placement of topsoil and seeding.
    - He also noted that the tree box filters still do not have any trees planted within them – nor have trees been planted anywhere else on the site where they were supposed to be planted.
  - Geoff Tillotson, as a member of the Planning Board, said that the proponents of the project (i.e. Rohit Garg et. al.) cannot collect/remove electricity from the property until Solar II has final approval from the Planning Board.
- **9:08 PM – Adjourn Meeting**
  - GB moved to adjourn; MP 2<sup>nd</sup>.
    - Motion approved unanimously.

**Minutes Recorded and Submitted by Jessica G. Gugino, Clerk**

**Date / Signature of Approval:**

10/13/2022 

Transcript of texts received by J. Gugino on personal cellphone from resident Annie Reed on Thursday, 9/22/2022, prior to the Conservation Commission meeting in Town Hall less than an hour later, at 7 PM:

6:07 PM -- Ms. Reed: Hey I hope you all have a chance to check your con come [sic] email before the meeting. I sent you and CCed Heather and John [sic] with my comments regarding your recommendations and comments on the peer review report etc. I hope it's not too late for you guys to discuss these issues and concerns. I am hoping you will not make any recommendations until more information is gathered.

6:08 PM – J. Gugino: I'll make sure we take a look at your comments but I am pretty sure we are finalizing our recommendation tonight. As Mark Phillips has said previously, new information is unlikely to change the recommendations we are already making. But I'll read your letter.

6:10 PM – Ms. Reed: I agree with your recommendations but not sure how they can be finalized until the applicant includes more required data for the area of development. Matt [Burne, BSC Group peer reviewer] found evidence of two turtle nesting sites on his site walk in the area of development. How do you even know what kind of turtles are there and if they're an endangered species or not when no evaluation has been done for the area of development.

6:11 PM – J. Gugino: I'll read your email to the Commission...See what everybody says.

6:12 PM – Ms. Reed: I don't understand why you would finalize recommendations before following the recommendations of the peer reviewer. What is the point of hiring him and paying him and then ignoring his recommendations. What's the rush? The planning board can continue this project and postpone further review until the applicant properly surveys the ecological value and documents all the species that are in the area where he's proposing putting houses down.

6:14 PM – Ms. Reed: And FYI, I took a 4 ½ minute video today in the rain of water pouring down the gravel road, traversing [W]right road missing the storm drains cutting a new swatch through the berm next to Standish Avenue running down Standish into a giant standing pond at the bottom, and then cutting a path through the neighbors lawn and gravel to the beach and threw [sic] a plastic 12 inch diameter diverter pipe directly into Sandy Pond. And I have video proof. And I'm not sure what I'm gonna do with this yet.

6:17 PM – Ms. Reed: Heather told me it is illegal for any water from that site to be leaving the site, never mind running unobstructed and unfiltered directly into Sandy Pond. I would think that the applicant would be required to immediately address that and to fix the retention pond so it functions properly. I don't know why any [board or] commission would entertain any further review of this project. He hasn't cleaned up his mess from 16 years ago.

6:17 PM – J. Gugino: I'm getting ready to go to meeting now. I'll read your texts on this as well.

6:18 PM – Ms. Reed: I'll try texg u the video. It's large tho & might not go thru

6:21 PM – [Video comes through showing Wright Road] – Ms. Reed: Stratton Hill runoff directly into Sandy Pond.

6:39 PM – Ms. Reed; FYI – I'm driving to the mtg now and I'll try to get there by 7:20. I see another project on the agenda first. I feel it's critically important to not make recommendations until more ecological info is gathered for the area where development is proposed. And I guess I need to b[e] there in person to reiterate that.

----- Forwarded message from Annie Reed <[anniehollyreed@gmail.com](mailto:anniehollyreed@gmail.com)> -----

Date: Thu, 22 Sep 2022 17:31:19 -0400 (5:31 PM EDT)

From: Annie Reed <[anniehollyreed@gmail.com](mailto:anniehollyreed@gmail.com)>

Subject: Stratton Hill Conservation Commission draft recommendations

To: Heather Hampson <[hhampson@ayer.ma.us](mailto:hhampson@ayer.ma.us)>

Cc: [jgugino@ayer.ma.us](mailto:jgugino@ayer.ma.us), Marion Stoddart <[marionstoddartov40@gmail.com](mailto:marionstoddartov40@gmail.com)>, Mark Archambault <[marchambault@ayer.ma.us](mailto:marchambault@ayer.ma.us)>, [jschmalenberger@ayer.ma.us](mailto:jschmalenberger@ayer.ma.us), [anne.gagnon@state.ma.us](mailto:anne.gagnon@state.ma.us), [lauren.glorioso@state.ma.us](mailto:lauren.glorioso@state.ma.us), [tlautzenheiser@massaudubon.org](mailto:tlautzenheiser@massaudubon.org), Al Futterman <[alf@nashuariverwatershed.org](mailto:alf@nashuariverwatershed.org)>, Stephanie Hebb <[shebb@msn.com](mailto:shebb@msn.com)>, Carolyn McCreary <[clmccreary@comcast.net](mailto:clmccreary@comcast.net)>, [mburne@bscgroup.com](mailto:mburne@bscgroup.com), [jkrantz@ayer.ma.us](mailto:jkrantz@ayer.ma.us)

Hi Heather

I am unable to attend tonight's Conservation meeting due to family illness, but I would like to share my thoughts & provide my community input for review & discussion among ConCom members & other interested parties. I would also like to request that this correspondence (and attachments) be included in the meeting record, and shared w/ any authorities/agencies/boards & community members as is appropriate.

I have attached the draft of the Conservation Recommendation to the Planning Board, which is included in the packet posted on the Town's website for tonight's meeting. It highlights some of my areas of specific concern & my recommendations for discussion to address those concerns in Red. I would like to commend the Commission for all the thoughtful recommendations included in this draft, and I hope that my comments & recommendations will be received in the way I have intended. And that is to further supplement and continue collecting as much relevant & required ecological information/data, & draw on reports & recommendations (compiled by scientists & authorities w/ the authority & expertise necessary) to evaluate & guide future development w/ the utmost ecological sensitivity & least disturbance possible, on this a large, beautiful & pristine parcel that is such a wonderful part of our natural environment & our community.

**The most important concerns & general comments I have are as follows, and I think it is premature for the Conservation Commission to make any recommendations to the Planning Board, prior to considering the following:**

I believe The Conservation Commission has both the ecological expertise & legal authority to retain the services of an ecological professional per G.L. Ch. 44S53G (attached) to conduct the critical ecological investigations that the BSC peer review indicates are missing or incomplete in their report (attached) & make recommendations based on the collected data. I also believe that the Conservation Commission should retain the legal services of an environmental & Land use law attorney, per G.L. Ch. 44S53G, to ensure that all required new & existing environmental & State agency permits are in place. Additionally, Authorities/Board members from the Town of Ayer, and any retained legal & environmental consultants, should be in direct contact w/ NHESP's Chief biologist Lauren Glorioso, to review the status of all Agencies & required permits, and to ensure the applicant's compliance, if he continues to rely on the development of the Stratton Hill parcel w/ current permits. This should not be deferred to The Planning Board under the OSRD Bylaw (10.1.3.B.3), as I believe their primary pervue & authority is to issue, review & oversee Town permits, for which they have the required expertise. I believe the Planning Board is seeking highly qualified & expert recommendations from the Conservation Commission, in order to further review & evaluate the preliminary plan that has been submitted to them. Furthermore, The Commission retained the services of BSC to conduct a peer review of the Conservation Analysis submitted by the applicant, & the BSC report has made the same recommendations & come to the same conclusions (see comments 19-22 in attached report). The report has also recommended that the applicant provide legal proof that an extension or new filing has been made w/ the Division of Fisheries & Wildlife, and the applicant provide proof that he is in compliance w/ the 2005 CMP condition requirements. As the Commission Recommendation draft notes, Tom Lautzenheiser (who is a Mass Audubon senior ecologist and has extensive knowledge of the abutting Groton Rocky Hill wildlife sanctuary) has indicated the applicant is NOT in compliance w/ requirements for turtle nesting provisions for the Groton portion of the CMP.

Below are more specific items:

Item 1 (see pg 3 of 6 in Recommendations document):

The applicant has not conducted a Rare Herpetofaunal Investigation for the Ayer portion of the parcel, which of course includes the southern portion of the site where development is being proposed. BSC has indicated in their peer review (see highlighted sections) that as a result of the lack of investigation(s) is there is no information or data presented regarding Land within ACEC (the entire parcel), Land w/in BioMap2 CNL (nearly the entire parcel)

and requests additional data be provided about distribution of valuable upland & wetland habitats, along with an evaluation of the ecological functions & values of the property.

The report goes on to note that the Upland vegetation analysis does not identify specimen trees or unique or rare plant species or address the condition thereof. I would like to request that the Conservation Commission require that a vegetation analysis be conducted for the entire southern portion of the parcel (including southern portion of the beaver pond & adjacent wetlands, the southeastern property line, & the southwestern property line along Long Pond). It should be noted that the applicant's submitted application narrative dated 6/1/22 - requested a waiver for a VI (H) Landscape Plan - which requires a plan showing trees on the site which are more than 12" in diameter. I would request that under no circumstances should this waiver be granted by the OHJ (Authority Having Jurisdiction) for any areas of the parcel that are south of the Beaver pond or adjacent to it.

Wildlife Movement Corridors have not been identified, quantified, evaluated or addressed.

Wildlife Habitat has not been identified, quantified, evaluated or addressed. The only information provided comes from a nearly 20 year old Rare Herpetofaunal Investigation that doesn't include any of the project development site or adjacent areas w/in the Ayer portion of the parcel. It should be noted that BSC conducted a site visit on August 5, 2022, & photo documented (2) turtle nesting activity sites within or directly adjacent to the proposed 20 acre area of development.

Scenic vistas have not been identified or addressed.

Cultural & Historic Assets haven't been addressed & BSC has recommended an evaluation from the Massachusetts Historical Commission.

Invasive Species have not been identified, quantified, evaluated or addressed. BSC indicated the presence of invasive plant species on the site.

How can The Conservation Commission identify, review and make any recommendations to The Planning Board regarding the most appropriate area(s) for development - e.i. the lowest ecological priority areas, without this data collection & evaluation?

Item 2 (see pg 5 of 6 in Recommendations document):

Blasting - I believe the Commission should recommend that the applicant be strongly encouraged to pursue further development of the site with no additional blasting of any kind required.

Item 3 (see pg 5 of 6 in Recommendations document and my comments above):

The Conservation Commission & The Planning Board should be in direct contact w/ any & all authorities (State, Environmental, Federal etc.) having the jurisdictional authority to issue permit(s) required by the applicant in pursuit of any further development of the Stratton Hill parcel.

I would also like to note that this parcel has been identified in a 2018 Preservation Priority Report for the Town of Ayer by MRPC, as the #1 Priority Preservation Area in the Final Analysis. I would think that given that designation, in addition to the complexities & high ecological value of this site, it would be in the best interests of the neighbors & the surrounding community, as well as Ayer Town Boards, Commissions & Departments, and State environmental agencies, to retain the services of an attorney with the legal expertise, experience & credentials to review & coordinate w/ Robert Collins (the applicant's legal representative) as this proposed OSRD continues to move through the permitting & review process.

Thank you all for your consideration & please accept my apologies for sending this email at this late hour.  
Best regards

Annie Reed

7 Wachusett Ave East Ayer MA  
Mobile 617-905-6426

Please note: Attachments may need to be included in separate emails or Chrome links etc.

----- End forwarded message -----