

5500 Millerstown Road  
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Vermont Department of Environmental Conservation  
Watershed Management Division  
c/o Bethany Sargent  
1 National Life Drive, Davis 3  
Montpelier, VT 05620-3522  
Bethany.sargent@vermont.gov

To Whom it May Concern:

My sister Karen Jeffers and I are land owners of properties affected by the petition to reclassify Blue Bank Brook from a B(2) stream to an A(1) stream. Our property includes portions of Ripton second division lots 119, 120, and 122 and totals 212 acres in size. The stream itself crosses our land on lots 120 and 122. The proposed basin regulation includes all of our property on lots 119, 120, and 122.

A short history of the land is important to understanding the stream and our concerns about the petition. My great-grandfather's name was Lewis Chatfield.<sup>1</sup> He grew up in Ripton. His childhood wasn't easy. Lewis' father abandoned Lewis' mother and her six children when Lewis was not yet two years old. At that time, Ripton's industry was focused on lumbering and lumber products – not an occupation for women in those days, much less for a woman with six small children. Lewis' mother turned to farming, a difficult endeavor on Ripton hills. Today her farm is part of the Green Mountain National Forest and is known as Chatfield clearing.

As soon as my great-grandfather was old enough to work, he hired himself out in the lumbering business. In 1871, he purchased Ripton first division lots 120 and 122, which are part of the subject stream reclassification petition. Although Lewis was only eighteen years old at the time, all of the money for the purchase came from the fruits of his own hard labor. In 1872, he added to his land with a purchase of the school lease on a portion of lot 119. In 1876, he constructed a small house entirely with his own hands on lot 120 to serve as a home for his bride, Sarah Durfey. We have his diary in which he wrote of the construction. After his marriage, he continued to log, but also farmed lots 119 and 120 to provide food for his family. Sarah died in 1883, leaving Lewis with two small children. Five years later, he married again, this time to Ida Foster. By 1899, he and Ida had had four children together. With a total of six children and two adults, the small house was bursting at the seams, so Lewis purchased land in Lincoln on which stood a larger house. He moved his family there. But he didn't sell the Ripton land. He had very little ready money. The logs on the land were wealth for him. He was determined to hold onto the land and continue logging it.

When Lewis' son Daniel, my grandfather, finished sixth grade, he followed his father into the logging business. In 1927, Lewis and Daniel were hit by lightning while logging. Fortunately, they survived, although one of their horses and one of their oxen did not. That incident, plus several other logging accidents, persuaded my grandfather to abandon the lumbering business and take up dairy farming. Thenceforth, Lewis and Daniel contracted with others to do commercial logging on the land, but continued to cut wood themselves to heat their

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<sup>1</sup> His given name was Israel Lewis Chatfield, but he was usually known as Lewis.

homes and to make maple syrup. (By now my grandfather had married and had moved into a house across the road from his parents.)

When Lewis died in 1935, he provided for his two spinster daughters, Lucinda May and Laura Elizabeth by willing them his Ripton lots. After Cindy died in 1943, Lizzie became the sole owner of the two properties. She eventually deeded them to my grandfather, who had taken care of her ever since the death of their parents.

Although the main dairy farm was on the Lincoln land, my grandfather hayed on lot 120. It was an arduous endeavor. This was in the days before the current Forest Road was constructed. The road to the Ripton lots was primitive. My grandfather mowed the hay with a sickle. The road could not accommodate his hay wagon, so he had to make multiple trips in the much smaller farm wagon to haul the hay back to his farm. The wagon, incidentally, was pulled by his team of horses, not a tractor. My grandfather continued haying lot 120 through the 1960's. He also lumbered there regularly, as did his father before him and his wife and daughter after him.

Lot 122 has always been used as a wood lot. It has been logged at regular intervals ever since my family has owned this land. I have memories of accompanying my grandfather to survey trees to be commercially logged. Although at that time, I wasn't much interested in logging, I loved the spruce gum he used to cut for us to chew. I have memories of trucks loaded with huge logs bound for local sawmills. I have memories of other trucks brimming with Christmas trees bound for the New York market. And I have memories of going with my father and grandfather to cut a Christmas tree for our home.

In due course of time, my grandfather died and my grandmother became the sole owner of the properties. She hadn't much money. Grandma rented out the farm in Lincoln and continued to lumber on the Ripton lots. Although those activities didn't generate sufficient income to pay the taxes, let alone other expenses she had, she held onto the land because she loved it – and knew that her grandchildren did, too. Upon my grandmother's death, she willed the land to her sole child, my mother, but specified that my mother could not sell the land without offering it to us children first. My mother used the land just as generations before, for logging and farming. My mother died in 2016 and willed the land to her three surviving children. My brother opted to take cash, but my sister and I did not want to part with the land which had been in our family for so long. We are now the owners of the land. We are the fourth generation in our family to own this land. We are continuing to use the land for logging and farming, just as it has been used for so long. Our children and grandchildren are learning to love the land, like we do. We hope to pass it on to them.

I would have liked to have included historical pictures of the property. We have some going back to the 1940's. But those pictures are in Vermont. Because of Vermont's COVID restrictions I have been unable to travel there, so cannot access pictures to include them in my comments. I think it is unfair of Vermont's Department of Environmental Conservation to have comment period during a time period when we cannot access documents or information because of quarantine regulations imposed by the State. I request that the comment period be extended to a reasonable time after the quarantine is lifted so that we may gather additional information.

Having given you a brief history, I would like to turn to the petition itself. The history is vital to understanding the status of the brook. I would have gladly shared the history with the petitioners. However, they never contacted us.

I first received notification of the proposed stream reclassification from the Vermont Department of Environmental Conservation (DEC) on February 27th of this year. I immediately went on-line to find the petition. There, I read that community outreach by the petitioner had

supposedly included letters to affected property owners before the petition was submitted. That astounded me. My sister and I had heard nothing about the proposed action before the DEC letter. The very evening that I received the letter, I called Mr. Mark Nelson, who was shown as the petitioner. A few days later, Mr. Nelson sent me an email indicating that a meeting about the proposed reclassification had been held with the Ripton select board on April 24, 2017. He told me that all affected property owners had been notified of that meeting. At that time, my mother's estate was administering the property. Mr. Nelson's email said that a letter had been sent to Paul Callahan, the executor of my mother's estate, at P.O. Box 100 in Quaker Street, New York. Mr. Callahan's address is P.O. Box 100 in Duanesburg, New York. The Quaker Street post office was closed in 2008.<sup>2</sup> P.O. Box 100 in Quaker Street was not a valid U.S. Postal address for anyone in 2017. Mr. Nelson indicated a second informational meeting was held in Ripton on September 5, 2018. Mr. Nelson wrote that he had sent a letter about that meeting to the same invalid address. However, Addison County Probate Court had decreed the land to my sister and me on October 2, 2017. The decree was recorded in the Ripton town office on November 2, 2017, nearly a year before the 2018 meeting. So, not only was the second letter sent to an invalid address, but also it was not sent to the current owners.<sup>3</sup> Even if Mr. Nelson had carelessly or inadvertently not checked on possible ownership changes before the 2018 letter was sent, when the petition was filed in 2019, it had to have been obvious that there was a change in ownership. But no one contacted us. We knew nothing about the proposed stream reclassification until just a month ago, despite being the largest private property owners of land in the Blue Bank Brook basin, by far.

All of our subject property is registered in Vermont's Use Value program. It is important to understand that the Use Value program is a contract between us and the State of Vermont. The existing rules of the Use Value program require that we log or farm the land. The Use Value program does not permit us to let the land permanently return to wilderness, no matter how much some people may think we should. Vermont's interest in having these contracts is for us to provide jobs for Vermonters through either farming or logging operations. The state, in return, pays a portion of our town taxes. The state also retains a lien on our property should we decide to remove it from the program.

I want to emphasize that enrollment in the Use Value program is a choice of the land owner, not the town or state. We can enroll as long as we qualify under the regulations. Ripton cannot require property owners to either keep or remove their land from the Use Value program. My sister and I are cognizant of the financial penalties for removing land from the program. In fact, I own land elsewhere that was once in a Current Value program. When regulations and circumstances changed, I removed the land from the program and paid the penalty. If my sister and I decide it is in our best interest to remove the subject property from Use Value, we will. The fact that the land is in the Use Value Program is not a reason to reclassify the stream to a higher classification. Quite the contrary. It is a reason to keep the existing stream classification because land will be used. It will not remain as wilderness.

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<sup>2</sup> When the Quaker Street post office closed, the post office boxes were physically moved to the town of Delanson. People who had Quaker Street post office boxes could elect to have mail delivered to their houses, or could pick up their mail in Delanson. Subsequent to the relocation of the postal boxes, as people with Quaker Street addressed boxes opted for delivery, died, or moved, their boxes were decommissioned. Quaker Street Box 100 had been decommissioned when the letter was sent.

<sup>3</sup> I visited the town offices a few days after the decree was recorded and made sure that my address was recorded correctly.

All of our leased land in lot 119, most of our land in lot 120, and roughly half of our land in lot 122 lie on the east bank of Blue Bank Brook. Our only access to that land is across the brook.

I'm sure many of you are familiar with the brook. I am, too, obviously. It is a pretty little brook, dotted with beaver dams. Beavers are furry little creatures who are fun to watch. Their structures are engineering marvels. Beaver dams can be good for the environment. The ponds trap silt as water crosses them. They retain phosphorus and nitrates. The ponds can also act as aquifer recharge areas. Beaver ponds can slow flood waters, reducing downstream erosion.

The vast majority of the beaver dams on Blue Bank Brook are on our property. We recognize that motorists, bicyclists and hikers all enjoy our beaver ponds. I enjoy the beaver presence on our properties, myself, and am glad others do, too. I've often shown visitors access points so they can get close to the dams and lodges.

However, there is another side to beavers. The beavers are cutting down our trees. In other words, the beavers are destroying part of the value of our property. The damage for the last few years has not been significant, so my sister and I have permitted the beavers to stay for the time being. But we are realists. The beaver dams are now impeding and preventing access to our land, so will have to be removed.

Elimination of the beavers would not be something new for Blue Bank Brook. My grandfather regularly had the beavers trapped. Sometimes, the beavers ate themselves out of house and home, so to speak. That is, after having destroyed all trees readily accessible to them, they moved on. Typically, from construction to abandonment of a dam by beavers is between ten and twenty years. I assume my great-grandfather, before my grandfather, kept the beavers out of the brook. In 2003, my mother had the beavers and their dam removed before logging was done on lot 122. In fact, what many people presume is a Natural Forest turnout by the large beaver dam is actually our private logging landing. The beavers returned about seven years after the dam was last removed. They have been there now for about ten years and depleted a good deal of the wood readily available to them. It is inevitable that they will abandon their dam soon, even if we do nothing.

When the beavers leave one of their impoundments, either on their own or by human intervention, the dams eventually fail, sometimes slowly and sometimes catastrophically. Catastrophic failure would cause an immediate and significant change to the brook's bed. However, even if the failure is not catastrophic, the ponds will no longer collect silt. Some of that silt, which has been collecting for over ten years, will be washed down the brook. The flow in the brook will be swifter, because it will not be slowed by the ponds. Swifter flow will cause more erosion. Phosphates and nitrates in the brook will rise. The pretty little brook will be changed and the drained ponds will be eyesores. Eventually, the brook will recover. However, it is not realistic to think the brook will remain as it is now. Nor is it reasonable for the DEC to reclassify the brook thinking that it will remain as it is now.

What is our logging timetable? Lots 119 and 120 were supposed to be logged in 2016. My sister and I requested that the logging be postponed because of a sugar lease on the land that runs to 2026. For the portions of lots 119 and 120 east of the brook, the state approved logging plan is to remove one third of the trees. West of the brook, the state approved plan is to clear cut patches between one half acre and four acres in size, with a total clear cut of approximately half of the acres west of the brook. Logging will begin in 2026 or 2027 after the sugar lease expires.

On lot 122, the approved plan is to reassess the timber in 2023, two years from now. The assessment will set the future logging plan, which will likely involve significant cutting.

I want to re-emphasize that our logging plans have already been approved by the State of Vermont.

Although our inclination had been to let the beaver dams remain until we undertake logging, we will have to remove the dams sooner. The dam on lot 122 is beginning to destroy the existing logging road. The dams on lot 120 may soon impact Barrows Road which crosses the property. Barrows Road is not only our access to the east side of our lot, but also the access road to six lots beyond us, all of which contain homes.

How will logging affect the land? The petition mentions that the Vermont Department of Forests, Parks and Recreation is concerned that reclassifying the brook may impact forest operations within the affected area. The petitioner responds that adherence to logging AMPs (Acceptable Management Practices) presumes compliance with nonpoint source discharge. Vermont Title 10, § 29A-203 (1) reads: “The requirements of these rules for any activity causing a nonpoint source discharge shall be presumed to be satisfied when the activity is in compliance with the RAPs [Remedial Action Plans], if applicable, is in compliance with the AMPs, if applicable; or is in compliance with the BMPs [Best Management Practices] required by statute, rule, permit, order, or other legally enforceable mechanism.” That seems to agree with what the petitioner has written. But let us look at subparagraph 2 of that same section. That reads, “Any presumption provided by this section shall be negated when a water quality analysis conducted according to §29A-201(7) of these rules demonstrates that there is a violation of these rules.” Let’s go to §29A-201(7). That says that nonpoint source pollution monitoring procedures “shall be adopted after public notice and comment. Until such procedures are adopted, nonpoint source pollution monitoring shall be conducted in accordance with generally accepted scientific monitoring or evaluation methodologies which the Secretary determines to be appropriate.”

What does all that mean? It means that we can comply with all AMPs and still be found to be in violation of the nonpoint source discharge regulations. That determination can be made by whatever methodology, scientific or not, that the Secretary of DEC finds appropriate.

Can logging cause alterations to streams even if AMPs are followed? Yes. The AMPs are designed to minimize, but not completely eliminate, the effect of logging on the environment. To quote directly from Vermont’s AMPs: “**Usually, it is impossible to avoid disturbing some soil or concentrating some flowing water during a harvest.**”<sup>4</sup> Thus, logging operations will necessarily create some water impact, even though AMPs are followed. We are concerned that we could be subjected to penalties when that happens if the stream is reclassified.

The DEC maintains that logging operations have been undertaken elsewhere near streams classified A(1). However, the DEC does not address where and when this occurred, nor whether the cost of logging was affected. Increasing our costs of logging compared to logging of nearby areas would be unjust.

I would like to turn now to the buffer zone. The current buffer zone for Blue Bank Brook on our properties is 50 feet. If the stream is reclassified, I understand that the buffer zone from the brook will be extended from the current 50 feet to 200 feet. While that extension may not seem to be much to the petitioner, extending the buffer zones would impact approximately 35 acres of our land in addition to the 9 or so acres within the current buffer zone. I submit that 35 acres is a substantial increase. Logging in those acres would be restricted. Should we wish to restore the meadows that bordered the brook in my grandfather and great-grandfather’s days, we would not be permitted to do that either. Neither the state nor the town is proposing to

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<sup>4</sup> [https://fpr.vermont.gov/sites/fpr/files/Forest\\_and\\_Forestry/Forest\\_Management/Library/FullDocument-7.29.pdf](https://fpr.vermont.gov/sites/fpr/files/Forest_and_Forestry/Forest_Management/Library/FullDocument-7.29.pdf), page 17.

compensate for such a taking of the value of our property. Furthermore, it is not clear if the buffer zone applies just to Blue Bank Brook or also to tributaries. If the latter, almost all of our land would be within 200 feet of one or more of the tributaries and we would not be permitted to log it at all. I want to re-emphasize that our current logging plans, which include logging within what would be a 200' buffer zone, have been duly approved by the State of Vermont.

In addition to the logging operations, we have an existing maple sugar lease on lots 119 and 120, as I mentioned before. Some people have an idyllic notion of sugaring. But modern sugaring is not without impact on the land. Sugaring involves construction of access roads. It involves installing many miles of sap lines, some above ground and some below ground. It can involve drastic trimming of trees, so much so that a sugared area can resemble a significantly logged area. If Blue Bank Brook were reclassified, buffer zones and stream quality regulations could make sugaring economically unfeasible.

Speaking of water quality, the petition itself fails to include any data about the current water quality. After receiving the notification of this meeting, I submitted an Open Records request to the DEC for all water samples the DEC might have for the brook. Mr. Addeo kindly sent me a spreadsheet indicating the brook or its tributaries had been sampled on six different dates between 2009 and 2019. All samplings were in October, except one which was in August. The first sampling, done on October 7, 2009 showed an iron content of 3260 ug/l (ppb), which is over triple the state's chronic standard of 1,000 ug/l. That sampling was just upstream of the confluence of Blue Bank Brook with the New Haven River. Curiously, the DEC never sampled the water at that location again, despite the fact that it seems to me that it is the most relevant sampling point. Since then, two points have been sampled. One is in the brook itself, roughly 2/3 of the way from the source to the junction with the New Haven River. The other sampling point is in a tributary to the brook. Vermont's standard for total phosphorus in small high gradient streams for management of aquatic biota and wildlife, one of the standards proposed for this reclassification, is 10 ppb. (§29A-306.) Various samplings in Blue Bank brook are as follows:

<u>Date</u>	<u>Location</u>	<u>Total phosphorus (ug/l)</u>
10/7/2009	Junction with New Haven River	136
10/14/2009	River mile 1.7	10.1
10/14/2009	Tributary	15.9
10/11/2010	river mile 1.7	9.54
10/11/2010	tributary	13.9
10/4/2011	River mile 1.7	9.76
10/4/2011	tributary	17
8/22/2017	river mile 1.7	16.3
8/22/2017	tributary	16.1
10/2/2019	river mile 1.7	23

As can be seen, of the ten samplings taken of the brook, only two met the total phosphorus standard.

For some criteria on every sampling, the sensitivity of the sampling was not sufficient to determine whether or not water quality standards were met. For instance, the state's standard for cadmium is a maximum of 0.94 ug/l and an average of 0.43 ug/l. However, the tests run at the

Blue Bank Brook sampling sites recorded merely that the result was less than 1 ug/l. Thus, the tests were not sufficiently sensitive to determine whether or not the standard was met.

The state has sampled the brook at river mile 1.7 and a tributary of the brook for macroinvertebrates and for fish. However, the brook has never been sampled near the junction of the New Haven river for either criteria. The fish sampling of the tributary contained insufficient numbers of fish to assess the quality of the tributary. (I know the tributary. I've never seen a fish in it.) Of the two fish samplings of the brook at river mile 1.7, one deemed the brook "good" and one "excellent." These samplings are insufficient to reclassify the brook.

Unless there is a demonstration that the entire brook consistently meets the Class A(1) quality standards during a variety of seasons and over time, it is unreasonable to change the classification. Furthermore, any stream reclassification is inappropriate unless such a demonstration is made after the beaver dams are removed.

The petitioner and the DEC seem to assume the brook is in its natural condition. Few people alive remember the brook before Forest Service road 54 was constructed. But I do. That road was built in the latter half of the 1960's. When the northern end of the road construction was underway, my father, grandfather, and I walked to Lot 122. The only evidence of the road on Lot 122 was surveyors' ribbons. One of the reasons my grandfather wanted to undertake the walk was to evaluate the effect the road would have on the brook. At that time, the land on either side of the brook was forested and not boggy. My grandfather's access road to the eastern part of his lot was a ford across the brook. He was concerned that the road construction might affect his access. His concern turned out to be valid. When the Forest Service constructed the road, the brook was channelized on our lot. That was roughly the first thousand feet of the brook. Fill for the roadbed destroyed the gentle slope to the ford. It also narrowed the small area on either side of the brook that is less steeply sloped. As mentioned above, beavers had always been a problem on Lot 120. However, it was only after the road was constructed and made conditions there more favorable for their activities, that they began building dams on Lot 122. When my mother had the beavers removed in 2003, she constructed the current access road. That road is roughly where the prior ford was. The access road includes a culvert under the road for the brook. The brook looks lovely in that area now, but that is the result of intervening years and my family's good stewardship of the land, rather than a reflection of time immemorial.

The petition is sloppily written. Attachment 3 says there are five Use Value Appraisal parcels within the watershed and refers to attached map 20. Map 20 shows only four parcels in Use Value. One of those four parcels is actually Forest Service land. Several affected property owners in Lincoln were not listed on the petition and presumably were not notified of this meeting. In one place the petition refers to the Blue Bank Brook as Goshen Brook. The petition indicates that numeric water quality criteria were appended. We could not find them. At one point, the petition refers to an existing A(1) watershed in the southeast portion of the Blue Bank Brook watershed. It is actually in the southwest.

An email dated March 2, 2021 sent to me by Mr. Nelson stated that the DEC and the Addison County River Watch asked the Ripton Conservation Committee to petition the DEC for the reclassification. I question the fairness of the agency, which is tasked with deciding on the proposed reclassification, also having being the instigator for the petition. I am puzzled as to why the DEC did not involve us, the people most affected, in discussions.

I am also puzzled as to why the DEC did not advise us of the sampling that was undertaken on our property. The Forest Service, through a deed between my grandparents and the United States of America, has a right of way and easement across our land for the purpose of

locating, constructing, operating, and maintaining a highway.<sup>5</sup> If the road is abandoned, the deed specifically states that the easement rights will be terminated. In fact, we pay property taxes to the Town of Ripton on the land underlying the Forest Service road. The right of way and easement does not include any provision or permission for water sampling. One of the sampling locations for the DEC is on our land. I do not know what the DEC's policy for sampling on private property for the purpose of reclassifying streams is. However, it would seem, at the very least, to have been polite to have involved the property owners.

It has generally been my family's policy to share the land with people who want to walk and hunt there. Thus, for most of the time the land has been owned by my family, it has not been posted. However, recently, when local residents were shooting semi-automatic guns on our land into and across the beaver ponds and refused to heed our requests to stop, we posted the land. An unknown person removed the signs. We put the signs back up. An unknown person took them taken down again.

A few years ago, the town changed the zoning of our property to conservation land. At the time, our mother owned the land. She was more than a bit of a packrat. After her death, my sister and I went through her papers. There were documents going back decades, including all of her correspondence with various foresters, the UVA documentation, lumbering receipts, etc. Even my grandmother's original UVA application from 1981 was among the papers. What we did not find was any letter from the town notifying my mother of a proposed zoning change. We suspect she was never given an opportunity to protest the zoning, just as the town in its various meetings about the current project never notified us that anything was afoot. Mom would certainly have opposed the zoning change. We believe that, with the zoning change and this proposed stream reclassification change, Ripton is, in essence, taking our land and severely restricting its use – perhaps preventing us from using it at all.

Ms. Sargent informed me that this is the first time a reclassification petition has been submitted to the DEC for water crossing private land. It is my understanding that all current A(1) waters are above 2,500 feet in elevation (mostly owned by government entities) or are public property. But this would affect private property. Several of affected properties are owned by persons who were not consulted at all before the petition was submitted. A few would find this petition a complete surprise even now, because they were not included in the DEC notifications about the public hearing and comment period.

My sister and I both appreciate environmental concerns. We have both volunteered literally thousands of hours to teach children about the environment through a wide variety of programs, including programs for disadvantaged urban children. I served on the board of directors for a local nature preserve. We are the type of people who don't remove dead trees in our yards because they provide food and homes for woodpeckers. We don't mow our lawns until after the spring wildflowers die. We keep our home thermostats at temperatures most people would consider icy during the winter and sweltering during the summer in order to limit energy consumption. Instead of adjusting the thermostats, we wear jackets indoors in cold weather and use natural ventilation and shade to keep our homes tolerable in the summer. Although not wetlands experts, we're cognizant of such things and their value to the environment. We are the type of people who know that walking through mud on hiking paths is better for the environment than skirting around the mudholes. In short, we are reasonably knowledgeable about the environment.

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<sup>5</sup> My grandparents opposed construction of the Forest Service road. They were happy with their primitive access, which had less impact on the land.



My sister and I are very aware that one of our lots is surrounded by National Forest and the other lot borders the National Forest on parts of three sides. We “get” that some people, perhaps including the petitioner, the town of Ripton and the DEC, would like our lands to remain forever wilderness and regulate it as such. But it is not part of the National Forest lands. It is our land. We are committed to being good stewards of the environment and intend to manage the land responsibly. However, that does not mean that we will condone attempts to limit our use of our land.

We appreciate that people have put a lot of work into the petition. They say they are trying to be good neighbors. How? It is not their land they wish to regulate. It is our land. Neither the petitioner nor any of Ripton’s Conservation Commission is affected by the petition. The petition contains nary a supporting letter from an affected landowner. What are we getting in return? Nothing. We are concerned that reclassification would result in an unjust reduction of the value of our property. It could make accessing our land on the east side of the stream difficult or extremely expensive. In proposing the stream reclassification, neither Ripton nor the State of Vermont are considering the historical use and state approved future use of the land.

My sister and I love this land and have a deep family attachment to it. Although neither of us live in Vermont right now, many of our ancestors first came to Vermont before it was a state. We have spent many happy days on the farm. Vermont is in our bones. This very year, we are celebrating the sesquicentennial of my great-grandfather’s purchase of land. Very little land in Vermont has been owned by a single family for that many years. If my family had not been good stewards of the land for 150 years, the brook would not be in its current state. Being good stewards has not meant constantly keeping the brook pristine, but working with it in such a way that it can recover after changes. We feel we are being punished for having been such good stewards.

For all the reasons above, I respectfully, but earnestly, ask that the petition as it regards Blue Bank Brook be denied.

Sincerely,

Ellen Forshaw