

Meenan, Evan

From: William Jewell <wmjewellco@comcast.net>
Sent: Thursday, August 30, 2018 8:44 AM
To: NRB - Comments
Subject: Riverbend Associates Limited Partnership Proposed AO Public Comment

I have been working with Ned Childs on the Riverbend Associates project in Rockingham on and off for many years. Due to fiscal restrictions my involvement was limited to an hour or two at a time. My observation is that there is an institutional bias against this project. Witness the size of the proposed fine of \$60,000.

Another example is the required deed restrictions. The Associates argued that since there was an A250 permit with the same restrictions, a deed with the same restrictions is redundant. In addition, if there is a future reason to change the restrictions it is easier to change the permit rather than the deed. Normally the Coordinator would help an applicant prepare the argument for review by the District Commission. I can find no correspondence that the Coordinator offered this help. Since the advent of Woolly Adelgid infestations, Hemlock management has changed significantly. Some of the proposed deed restrictions need to be changed.

The Associates prepared a, I thought sensible, forestry plan and sent to the parties for review. The plan was similar to the Current use plan. Time went by with no response. If the plan was not appropriate there should have been some paper work identifying the short comings and how to fix them. I found no such document. Upon implementing the plan, assumed OK due to no response, the ANR talked to the loggers on-site but did not notify the Associates until after the loggers completed the job. It seems as though the proper procedure would have been to issue a stop work order simultaneously to the logger and the Associates.

In general, some exceptions, the Associates actions were based on the assumption that they were in compliance. This project first got a permit in 1990, correspondence outlining the short comings was first issued late 2013. While working with the Associates is sometimes frustrating, there appears to be no offer of help from the various coordinators.

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