

VERMONT ENVIRONMENTAL BOARD
10 V.S.A. §§ 6001-6092

RE: Burlington Broadcasters, Inc. d/b/a WIZN; Land Use Permit
Charlotte Volunteer Fire & Rescue; Application #4C1004R-EB
& John Lane

MEMORANDUM OF DECISION

This proceeding is a consolidation of two appeals and two Declaratory Ruling Petitions, all concerning the WIZN radio tower located in Charlotte, Vermont. This memorandum of decision addresses preliminary issues including recusal, continuation of the hearing date, and party status.

I. PROCEDURAL SUMMARY

On June 4, 1999 the District #4 Environmental Commission (Commission) issued Land Use Permit (LUP) #4C1004R (Permit) and supporting Findings of Fact, Conclusions of Law, and Order (Reconsidered Decision) to Burlington Broadcasters, Inc. d/b/a WIZN (Burlington Broadcasters), Charlotte Volunteer Fire and Rescue Services, Inc. (CVFRS), and John Lane (collectively, Permittees). The Permit authorizes a previously constructed 199-foot communication and broadcast tower and an equipment building (Project). The Project is located on 17 acres of land on the northwest side of Pease Mountain, off Church Road in Charlotte. The tower currently contains broadcast antennae used by WIZN and CVFRS, as well as four antennae presently used and maintained by Verizon. Verizon's use of the tower is authorized under Land Use Permit #4C0901.

On July 2, 1999, Mary Beth Freeman, Graeme Freeman, Elaine Ittleman, Dr. Frank Ittleman (Freeman et al.) and Citizens for Appropriate Siting of Telecommunications Facilities (CCAPTF) (Freeman et al. and CCAPTF hereinafter collectively referred to as Appellants) filed an appeal with the Board from the Permit and the Reconsidered Decision alleging that the Commission erred in its conclusions concerning 10 V.S.A. Sections 6086(a)(1), (9)(K), (10) and with respect to its rulings on party status. Appellants' July 2, 1999 appeal incorporates by reference their previously filed appeal dated July 6, 1998 of the Commission's initial decision dated June 5, 1998 (1998 Decision). On July 14, 1999, Verizon filed a cross-appeal pertaining to the Project, wherein it contests the Commission's denial of Verizon's party status in the #4C1004R proceeding. Verizon's cross-appeal supersedes a Notice of Appeal filed on July 6, 1998 relative to the Commission's 1998 Decision.

The issuance of the Permit by the Commission vested jurisdiction with the Environmental Board to hear several other appeals that were filed in June and July

of 1998 (Other 1998 Appeals). The Other 1998 Appeals were held in abeyance pending the Commission's proceedings on Motions to Alter and Reconsider the Commission's Decision. The Other 1998 Appeals include an appeal filed by Charlotte Congregational Church (CCC), an appeal filed by Burlington Broadcasters, and an appeal filed by the Charlotte Central School Board (CCSB). Also pending on the Board's Docket are Declaratory Rulings #322 and #323, each of which appeals Jurisdictional Opinion # 4-116, dated March 29, 1996, which pertains to the Project.

As a result of the issuance of the Permit on June 4, 1999, Burlington Broadcasters' appeal of the Commission's June 5, 1998 Decision became moot. Verizon affirmatively superseded its July 6, 1998 appeal with its appeal of Land Use Permit #4C100R filed on July 14, 1999 and so its July 6, 1998 appeal is also moot. Both of the appeals referenced in this paragraph have been dismissed.

Also as a consequence of the Commission's issuance of the 1998 Decision and Land Use Permit #4C1004R, the appeals filed by CCSB and CCC on July 13, 1998 and July 10, 1998 respectively are moot.

Freeman et al. consolidated the claims set forth in their 1998 Appeals with those being pursued in their Notice of Appeal dated July 2, 1999, and have accordingly preserved any arguments raised in the former appeal to the extent now applicable.

There was also a revocation proceeding relative to a Permit #4C0901 issued to Steve Korwan d/b/a Contel Cellular, to which Verizon is a successor in interest. By a decision dated August 7, 2000, the Board dismissed the revocation petition. That decision has now become final.

On April 10, 2003, Chair Moulton Powden convened a prehearing conference. At the prehearing conference, the parties agreed that the two declaratory rulings should remain continued awaiting resolution of this appeal proceeding. During the prehearing conference, Chair Moulton Powden made verbal party status rulings and also established additional party status issues to be decided as preliminary issues following filings by the parties and potential parties all of which are set forth in the April 18, 2003 Prehearing Conference Report and Order (PHCR&O).

On April 17, 2003, Burlington Broadcasters filed Motions to Dismiss Mary Beth Freeman, CCAPTF, and CCC. Also on this date, Appellants filed a Motion to Recuse Board Member Christopher Roy, Esq.

On April 25, 2003, Verizon filed an objection to the merits hearing date. On April 29, 2003, Appellants, Verizon and CCC filed petitions for party status.

From April 29 through May 13, 2003, the parties filed replies to the above motions and petitions.

The Board deliberated on the above motions and petitions on May 21, 2003.

II. DISCUSSION

1. Recusal

Appellants ask that Board Member Christopher Roy recuse himself on the basis that Mr. Roy's law firm, Downs, Rachlin and Martin PLLC, has had and may continue to have telecommunications clients that could be affected by the decision in this matter. None of the parties in this matter are currently clients of Mr. Roy's law firm. Mr. Roy has requested an opinion on this issue from the Ethics Committee of the Vermont Bar Association. The Board is reviewing this issue under the Executive Code of Ethics. Mr. Roy and the Board will await these reviews and then formally decide whether Mr. Roy will hear this matter. Pending a decision on the recusal motion, Mr. Roy has agreed not to deliberate or participate in any Board decisions affecting this matter. Mr. Roy will be present during discussions, however, pending a final recusal decision.

Board members Richardson and Marsh hereby make the following disclosures. Board Member Jean Richardson is a Professor Emeritus of the University of Vermont (UVM). UVM's Environmental Program controls all natural areas in Vermont, including Pease Mountain. Member Richardson understands that UVM is not participating in this matter. Accordingly, Member Richardson will sit on this case as she will have the ability to remain fair and impartial.

Board Member Donald Marsh previously worked with Gerald Tarrant, Esq. and Liam Murphy, Esq. on Act 250 permitting matters unrelated to the instant proceeding. None of the parties appearing in this matter were a part of the former proceedings. Member Marsh will continue to sit on this case as the former relationship will not impact his ability to be fair and impartial.

2. Continuance of the Merits Hearing Date

Verizon filed a motion asking that the merits hearing set for February 25, 2004 be continued for two weeks to accommodate school vacation schedules.

Hearing no opposition to this motion, the Board grants the motion and will set a new hearing date for March 10, 2004.

3. Party Status

Petitions for party status are heard *de novo*, which means that the Board hears the petition anew, without reference to evidence or arguments presented to the Commission. *Re: Pico Peak Ski Resort, Inc.*, #1R0265-12-EB (March 2, 1995); *Re: St. Albans Group and Wal-Mart Stores*, #6F0471-EB, Findings of Fact, Conclusions of Law, and Order at 30 (Altered)(June 27, 1995), *aff'd, In re Wal Mart Stores, Inc.*, 702 A.2d 397 (1997); *Re: Gary Savoie d/b/a WLPL and Eleanor Bemis*, #2W0991-EB, Findings of Fact, Conclusions of Law, and Order (Oct. 11, 1995)(citing *Re: Swain Development Corp.*, #3W0445-2-EB, Memorandum of Decision at 4-7 (July 31, 1989)).

A) Elements for Party Status under the Environmental Board Rules (EBR):

i. EBR 14(A)(5)

The elements necessary to show status as an adjoining property owner under EBR 14(A)(5) are: First, that petitioner has property adjoining the project; and second, that the project may have a "direct effect" on petitioner's adjoining property under any of the ten Act 250 criteria. *Re: GHL Construction, Inc. and PAK Construction, Inc.*, #2S1124-EB, DR #396, Memorandum of Decision (Jan. 5 2001); *Re: Stonybrook Condominium Owners Association*, DR #385, Memorandum of Decision at 1- 2 (May 19, 2000); *Re: McDonald's Corporation*, #1R0477-5-EB, Memorandum of Decision at 10 (May 3, 2000).

ii. EBR 14(B)(1)

The Board may grant party status under EBR 14(B)(1) to any person who shows that the proposed project may affect that person's interest under any of the Act 250 criteria. To make this showing, the petitioner must adequately demonstrate: First, that the petitioner has a specified interest that may be affected by the proposed project, *Re: Maple Tree Place Associates*, #4C0775-EB (Interlocutory Appeal), Memorandum of Decision and Order at 6 (Oct. 11, 1996); and second, that the specified interest is different from interests of the general public, *Re: Springfield Hospital*, #2S0776-2-EB, Memorandum of Decision at 5-6 (Aug. 14, 1997), *appeal dismissed, In re Springfield Hospital*, No. 97-369 (October 30, 1997); see also, *Re: Josiah E. Lupton, Quiet River Campground*,

#3W0819 (Revised)-EB, Chair's Preliminary Ruling at 4 (Oct. 3, 2000).

iii. ***EBR 14(B)(2)***

A determination that a EBR 14(B)(2) party can materially assist the Board requires more than an assertion that the party can cross-examine witnesses and present experts. The Board considers the following elements. First, that they possess particular expertise with respect to the project; second, that the project is complex and that the issues presented by the project are novel and unfamiliar. *Re: Maple Tree Place Associates*, Memorandum of Decision and Order at 7; *see also, Re: Josiah E. Lupton, Quiet River Campground*, #3W0819 (Revised)-EB, Chair's Preliminary Ruling at 4 (Oct. 3, 2000) and *Re: Northeast Cooperatives and L&S Associates*, #2W0434-11-EB, Memorandum of Decision at 3 (Jan. 29, 1999). Third, the Board also considers whether another party will provide the assistance which a person who seeks EBR 14(B)(2) status may give. *Re: Stonybrook Condominium Owners Association*, Declaratory Ruling #385, Memorandum of Decision at 3 (May 3, 2000) (citing *Re: Circumferential Highway, State of Vermont, Agency of Transportation and Circumferential Highway District*, #4C0718-EB, Memorandum of Decision and Dismissal Order at 2 (Sept. 25, 1989)).

B) Verizon's Petition for Party Status

The Commission denied Verizon 14(B)(1) and 14(B)(2) party status under Criteria 1(Air), 8, and 10. Verizon petitions the Board for party status under EBR 14(B)(1) and 14(B)(2) for Criteria 1(Air), 8, and 10, stating that it holds a long-term lease of space on the subject tower and space on the ground near the base of the tower which it utilizes as a wireless base station. Verizon states that it has a separate Act 250 land use permit for its operations at the Project. Verizon argues that it has a direct monetary interest in the continued use of the Project as its communications support structure. Verizon argues that opponents to the tower raise issues of radio frequency radiation (RFR), an issue related to Criterion 1(Air), as part of their challenge to the Project's permit. Verizon states that it will ensure in this proceeding that the RFR for which it is responsible for receives separate and distinct treatment from RFR emitted by other users of the Project because Verizon has a separate LUP and because federal regulation of its RFR preempts the Board from considering its RFR. Verizon also alleges that its interests under Criteria 8 and 10 relate to ensuring that the Project continues to be available to support its wireless base station.

Appellants argue that Verizon's 14(B)(1) status should be limited to only Criterion 1(Air) and even then its status should be limited to ensuring that its own

interests are treated separately from that of other occupants of the tower. Appellants then argue that Verizon does not qualify for 14(A)(1) status under Criteria 8 and 10 because Verizon is without interests under those criteria.

The Board finds that Verizon's specific interest relating to RFR and Criterion 1(Air) and its continued use of the Project satisfy the elements of 14(B)(1) party status. The Board does not limit Verizon's party status under Criterion 1(Air) to its own RFR. The Board also finds, however, that Verizon does not have any specific interests with respect to Criteria 8 and 10. Accordingly, the Board grants Verizon EBR 14(B)(1) party status under Criterion 1(Air), but denies Verizon EBR 14(B)(1) party status under Criteria 8 and 10.

Appellants do not object to Verizon having 14(B)(2) status. With respect to Verizon's petition for EBR 14(B)(2) party status, the Board finds that Verizon, a large wireless communications company, has expertise relating to the Project. Furthermore, this Project is complex with novel and unfamiliar issues and the Board finds that Verizon will add to the proceeding beyond the other parties. Accordingly, the Board grants Verizon EBR 14(B)(2) party status under Criteria 1(Air), 8 and 10.

C) Charlotte Congregational Church's (CCC) Petition for Party Status

The PHCRO grants CCC EBR 14(A)(5) party status under Criteria 1(Air) and 8, continuing CCC's party status as it had before the Commission.

Burlington Broadcasters filed a Motion to Dismiss challenging CCC's party status. First, Burlington Broadcasters argues that CCC did not file an appeal and that just because the Commission granted CCC party status does not mean that CCC automatically receives the same party status before the Board.

The Board finds no merit to this argument as it is firmly established under Board precedent that a person or entity having party status before a district commission may participate in an appeal filed by a different party without filing an appeal itself. See *Re: The Stratton Corporation*, #2W0519-9R3-EB, Findings of Fact, Conclusions of Law, and Order at 4 (Jan. 15, 1998); *Re: Finard-Zamias Associates*, #1R0661-EB, Memorandum of Decision at 12 -13 (Mar. 28, 1990).

Second, Burlington Broadcasters argues that CCC did not attend any of the prehearing conferences in this matter, and therefore, it did not preserve its right to party status. As addressed in the PHCR&O, although CCC declined to either appeal or cross-appeal the June 4, 1999 Decision, by a filing dated August 3, 1999, CCC has sought to participate as a party under Criteria 1 and 8 in the

present appeal. Furthermore, as set forth above, CCC was granted EBR 14(A)(5) party status, a level of party status referred to as a 'statutory party,' by the Commission and absent an appeal of the Commission's grant of this party status, CCC retains that status before the Board without the need to re-petition or file a notice of appearance for the same party status before the Board. *Stratton*, Findings of Fact, Conclusions of Law, and Order at 4; *Finard-Zamias*, Memorandum of Decision at 12 -13; see also, *In re Wildlife Wonderland, Inc.*, 133 Vt. 507, 518 (1975).

Lastly, Burlington Broadcasters challenges the scope of CCC's status under Criterion 8, claiming that it should be limited to aesthetics only and not include historic sites or rare and irreplaceable natural areas. The basis for this limitation, as argued by Burlington Broadcasters, is that CCC did not raise issues of historic sites or rare and irreplaceable natural areas before the Commission. In its filing with the Board, CCC states that it repeatedly raised the issue of RFR having an impact on the use of its historic church. Accordingly, the Board will not limit CCC's Criterion 8 party status to aesthetics. CCC's party status is on all of Criterion 8.

D) Appellants' Petition for Party Status

1) *Mary Beth Freeman*:

14(A)(5) Party Status:

The Commission granted Ms. Freeman party status pursuant to EBR 14(A)(5) under "criteria 1(Air), 8-Aesthetics, and 10" but denied her party status under criteria 6 and 9(K). The PHCR&O grants Ms. Freeman continuing party status under EBR 14(A)(5), also referred to as "adjoiner party status," for Criteria 1(Air), 8, and 10.

Burlington Broadcasters filed a Motion to Dismiss Ms. Freeman on the grounds that Ms. Freeman no longer has property adjoining the Project, and therefore, no longer qualifies for 14(A)(5) party status.

Ms. Freeman's affidavit filed in support of her petition for party status acknowledges that she no longer owns property adjacent to the Project. Further, with respect to the land adjacent to the Project in which she once had a legal interest, her petition states: "[a]gain, it is true the residual interests in this land were quitclaimed by Mary Beth Freeman in early 2000."

To qualify for party status under EBR 14(A)(5) a petitioner must own property adjacent to the project. *Re: GHL Construction, Inc. and PAK Construction, Inc.*, #2S1124-EB, DR #396, Memorandum of Decision (Jan. 5, 2001); *Re: Stonybrook Condominium Owners Association*, DR 385, Memorandum of Decision at 1- 2 (May 19, 2000); *Re: McDonald's Corporation*, #1R0477-5-EB, Memorandum of Decision at 10 (May 3, 2000). As Ms. Freeman no longer owns property adjacent to the Project, she no longer satisfies the elements of adjoiner party status. *See, In re Estate of John A. Swinington*, 169 Vt. 583 (1999). Accordingly, the Board grants Burlington Broadcasters' motion and revokes Ms. Freeman's EBR 14(A)(5) party status under Criteria 1(Air), 8, and 10.

The Board does not address Burlington Broadcasters' challenge to the scope of Ms. Freeman's party status under Criterion 8 as Ms. Freeman's status is revoked.

14(B)(1) & (2) Party Status:

Any party which seeks party status pursuant to EBR 14(B) must adequately demonstrate that its interest may be affected by a project and that her interest is different from interests of the general public. Thus, Ms. Freeman bears the burden to convince the Board that her specific interest under Criteria 6 and 9(K) may be affected by the Project. *Maple Tree Place Associates*, Memorandum of Decision and Order at 6.

Ms. Freeman's Petition for EBR 14(B)(1) and 14(B)(2) party status for Criteria 6 and 9(K) states that her interests center on her son attending the Charlotte Central School and his safety there.

Burlington Broadcasters argues that the focus of Criteria 6 is on a municipalities ability to provide education services and for Criterion 9(K) the focus is on adverse effects to public investments. In essence, Burlington Broadcasters argues that the focus here is on municipal burdens not on burdens to individual parents.

The Board finds that Ms. Freeman's interests centering on her son attending the Charlotte Central School and his safety there are not interests cognizable under Criteria 6 and 9(K). The Board agrees with Burlington Broadcasters that the focus under Criteria 6 and 9(K) is on municipal burdens not on burdens to individual parents. Furthermore, Ms. Freeman's interests are no different than those of the general public. *See The Home Depot USA, Inc. et. al.*, #1R0048-12-EB, Memorandum of Decision (Nov. 30, 2000). Accordingly, the Board denies Ms.

Freeman's petition for party status under EBR 14(B)(1) for Criteria 6 and 9(K).

The Board also denies Ms. Freeman 14(B)(2) status for Criteria 6 and 9(K) as Ms. Freeman does not possess particular expertise with respect to the project and these Criteria and because another party will provide the assistance which Ms. Freeman may give, namely CCAPTF.

2) *Ittlemans:*

The Commission granted the Ittlemans party status pursuant to EBR 14(A)(5) under Criteria 1(Air), 8-Aesthetics, and 10 but denied them party status under Criteria 6 and 9(K). The PHCRO grants the Ittlemans continuing party status under EBR 14(A)(5) for Criteria 1(Air), 8, and 10.

Burlington Broadcasters challenges the scope of the Ittlemans' party status under Criterion 8 arguing that the status was for aesthetics only and did not go so far as to include historic sites or rare and irreplaceable natural areas.

In their Petition for Party Status, Appellants, which include the Ittlemans, argue that the Commission addressed Criterion 8 in total and that Appellants provided evidence on historic sites and on scenic and natural areas, including the University of Vermont Nature Area. The Board, however, finds no indication that the Ittlemans have any property adjoining the project which may experience a "direct effect" relative to historic sites or rare and irreplaceable natural areas. Accordingly, the Ittlemans' EBR 14(A)(5) party status under Criterion 8 is limited to aesthetic issues only.

The Ittlemans petition the Board for EBR 14(A)(5) and/or 14(B)(1) and/or 14(B)(2) party status for Criteria 6 and 9(K). As with Ms. Freeman's petition, the Ittlemans base their petition for party status under Criteria 6 and 9(K) on the fact that their son attends the Charlotte Central School, and their concerns for his safety there.

Burlington Broadcasters argues, as it did against Ms. Freeman, that the focus of Criterion 6 is on a municipality's ability to provide education services, and for Criterion 9(K) the focus is on adverse effects to public investments. In essence, Burlington Broadcasters argues that the focus is on municipal burdens not on burdens to individual parents.

The Board finds that the Ittlemans' interests centering on their son attending the Charlotte Central School and his safety there are not cognizable interests under

Criteria 6 and 9(K). The Board finds that such interests do not relate to the Ittlemans' adjoining property and therefore, the Ittlemans do not qualify for EBR 14(A)(5) party status for Criteria 6 and 9(K). Furthermore, the Board agrees with Burlington Broadcasters that the focus under Criteria 6 and 9(K) is on municipal burdens not on burdens to individual parents. The Ittleman's concerns here are no different than those of the general public. Accordingly, the Board denies the Ittlemans' petition for party status under EBR 14(B)(1) for Criteria 6 and 9(K).

The Board also denies the Ittlemans' 14(B)(2) status for Criteria 6 and 9(K) as the Ittlemans' themselves do not possess particular expertise with respect to the Project and the Criteria and because another party will provide the assistance which the Ittlemans may give, namely CCAPTF.

3) CCAPTF:

The Commission granted CCAPTF party status pursuant to EBR 14(B)(1) and 14(B)(2) under criteria 1(Air), 6, 8-Aesthetics, 9(K),"but denied them 14(B)(1) and 14(B)(2) party status under Criterion 10. The PHCRO grants CCAPTF (referred to as CAST in the PHCRO) continuing party status under EBR 14(B)(1) and 14(B)(2) under criteria 1(Air), 6, 8, and 9(K).

Burlington Broadcasters filed a Motion to Dismiss CCAPTF on the grounds that Ms. Freeman and Ms. Fournier, the only two representatives of CCAPTF who appeared at the Commission proceeding, no longer have property adjoining the Project, and therefore, CCAPTF no longer qualifies for party status. This would be a good argument to challenge 14(A)(5) status, but not to challenge 14(B)(1) or (2) status.

Burlington Broadcasters also challenges CCAPTF membership arguing that the Petition shows only Ms. Freeman and Ms. Fournier as members. The Board finds, however, that CCAPTF's Articles of Association (1996) list Mary Beth Freeman, Holly Fournier, Elaine Ittleman, Richard Bernstein, Ellen Lane, and William Pinney as members all with addresses in Charlotte. The Ittleman's property adjoins the Project.

It does not appear that Burlington Broadcasters makes any argument as to why the Board should dismiss CCAPTF's 14(B)(2) party status.

Accordingly, the Board denies Burlington Broadcasters' Motion to Dismiss CCAPTF.

CCAPTF petitions for EBR 14(B)(2) status under Criterion 10. CCAPTF argues that it has particular knowledge and expertise with respect to the Project and that issues in this case are complex. CCAPTF also argues that it has different resources and contacts than the other parties.

Burlington Broadcasters argues that CCAPTF does not have any specialized knowledge or expertise in town or regional plans and that compliance with the town or regional plan are not particularly complex or novel issues.

The Board finds that CCAPTF does have expertise relating to the Project and the Regional and Town Plans. The preliminary issues in this matter include consideration of what Town or Regional Plans will be applied as part of the Board's review of the Project's compliance with Criterion 10. The Board believes these issues are complex and that CCAPTF will provide expertise in resolving them as well as the merits issue relating to Criterion 10. Lastly, no other party will provide the assistance which CCAPTF will provide to the Board. Accordingly, the Board grants CCAPTF EBR 14(B)(2) party status under Criterion 10.

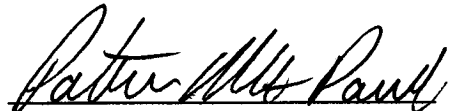
III. ORDER

1. Verizon's Motion to Continue the Merits Hearing is GRANTED. The hearing date is now scheduled for March 10, 2004 and the associated Prehearing Conference is now scheduled for March 8, 2004.
2. Verizon is GRANTED EBR 14(B)(1) party status under Criterion 1(Air), but DENIED EBR 14(B)(1) party status under Criteria 8 and 10. Verizon is GRANTED EBR 14(B)(2) party status under Criteria 1(Air), 8 and 10.
3. Burlington Broadcasters' Motion to Dismiss CCC is DENIED. CCC continues to have EBR 14(A)(5) party status under Criteria 1(Air) and 8, without limitation.
4. Burlington Broadcasters' Motion to Dismiss Mary Beth Freeman is GRANTED. Mary Beth Freeman's EBR 14(A)(5) party status under Criteria 1(Air), 8 and 10 is REVOKED.
5. Mary Beth Freeman's petition for EBR 14(B)(1) or 14(B)(2) party status under Criteria 6 and 9(K) is DENIED.

6. The Ittlemans' EBR 14(A)(5) party status under Criterion 8 is limited to aesthetics issues only.
7. The Ittlemans' petition for EBR 14(A)(5), 14(B)(1) and 14(B)(2) party status under Criteria 6 and 9(K) is DENIED.
8. Burlington Broadcasters' Motion to Dismiss CCAPTF is DENIED. CCAPTF retains its EBR 14(B)(1) and 14(B)(2) party status under Criteria 1(Air), 6, 8, and 9(K).
9. CCAPTF's Petition for EBR 14(B)(2) party status under Criterion 10 is GRANTED.

Dated at Montpelier, Vermont on the 6 day of June, 2003.

ENVIRONMENTAL BOARD



Patricia Moulton Powden, Chair
George Holland
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