

**Aquatic Nuisance Control Individual Permit
Under 10 V.S.A. § 1455**



Permittee Information

Permittee: Lake Bomoseen Friends Up North and the
Town of Hubbardton

Permit Number: 4445-ANC-H

Control Activity: Powered Mechanical Device –
Mechanical Harvesting

Waterbody: Lake Bomoseen, Castleton and
Hubbardton

a. Specific Conditions

Based upon the Findings contained in this permit, the Secretary of the Agency of Natural Resources (Secretary) has determined that the proposed aquatic nuisance control activity will comply with 10 V.S.A. § 1455 and is hereby approved under the following conditions.

1. Powered Mechanical Device. Mechanical harvesting is the control activity approved by this permit. Mechanical harvesting is considered the use of a vessel (mechanical harvester) that mechanically removes aquatic plants from within the water column to be collected and removed from the waterbody. Mechanical harvesting shall only occur with a mechanical harvester as approved by the Secretary.
2. Control Location. Mechanical harvesting shall only occur in Lake Bomoseen, Castleton and Hubbardton, within the locations as depicted in the figure titled "Proposed Harvest Area" in the Approved Application, or as approved in writing by the Secretary.
3. Recordkeeping.
 - A. All mechanical harvesting shall be recorded daily on the [Report Form](#) (Report Form) provided by the Secretary, or on an equivalent approved by the Secretary.
 - B. Any observation of a rare, threatened, or endangered species shall be recorded on a [Rare Species Report Form](#) provided by the Secretary, or on an equivalent approved by the Secretary.
4. Aquatic Nuisance Control Action Threshold. An action threshold shall be developed for mechanical harvesting. The action threshold shall be considered the point at which mechanical harvesting is necessary to control aquatic plant populations that interfere with navigation, boat-related recreation, or swimming within the approved control location. Mechanical harvesting shall only occur in locations where the action threshold has been met.
5. Qualitative Aquatic Plant Survey. Prior to mechanical harvesting beginning for the calendar year, a qualitative aquatic plant survey shall be conducted of an area proposed to be harvested to assess aquatic plant densities. The survey shall be used to determine whether and where the action threshold has been met. Additional qualitative aquatic plant surveys shall be completed as needed. A map outlining aquatic plant densities shall be produced while completing a qualitative aquatic plant survey. Aquatic plant densities shall be labeled using the following density rating key:
 - A. Very abundant: 75 - 100% of the water column consists of aquatic plants; populations are at the surface of the water forming mats
 - B. Abundant: 50% - 75% of the water column consists of aquatic plants; aquatic plants reach the surface of the water, mats have not yet formed
 - C. Common: 25% - 50% of the water column consists of aquatic plants
 - D. Occasional: 5% - 25% of the water column consists of aquatic plants
 - E. Scattered: less than 5% of the water column consists of aquatic plants

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6. Operation & Non-Target Impact Mitigation.

- A. Mechanical harvesting shall occur between July 1st and September 30th, between the hours of 10:00 am and 5:00 pm only, unless otherwise approved in writing by the Secretary.
- B. Mechanical harvesting shall not occur in waters less than three (3) feet of depth.
- C. Emergent aquatic plants shall not be harvested, such as bulrush (*Schoenoplectus* spp.).
- D. Mechanical harvesting shall not directly disturb the lake bottom. Large rocks, boulders, or large woody debris shall not be removed from the waterbody.
- E. Prior to conducting mechanical harvesting, the approved control location shall be searched for all rare, threatened, or endangered aquatic species known to occur in the waterbody, which are identified in finding c.5. of this permit. Rare, threatened, or endangered aquatic species shall not be removed and be reported if found.
- F. Harvested material shall be searched for turtles prior to transport and disposal of harvested material. Turtles found within the harvested material shall be safely and immediately returned to the water. This non-target impact mitigation measure shall be recorded on the daily report form (Report Form).
- G. Mechanical harvesting shall not occur within a Class II wetland and associated 50-foot wetland buffer except for the purposes of establishing a navigation channel or for any aquatic plant removal conducted in accordance with the [Wetland Rules](#). A navigation channel through a Class II wetland or 50-foot wetland buffer shall be the minimum width necessary to establish a navigation channel and shall be no greater than 20 feet wide.
- H. A Wetlands Permit or Approval, per 10 V.S.A. § 914, shall be obtained prior to commencement or continuance of the control activity if determined necessary.
- I. A quantitative aquatic plant survey may be required at the Secretary's request. A quantitative aquatic plant survey shall at a minimum contain the population locations and densities of all observed S1, S1S2, S2, S2S3, and S3 species.

7. Harvested Material Offloading Location.

- A. Harvested material shall be offloaded at the location(s) as identified in the Approved Application, or as approved by the Secretary.
- B. A request to establish or use a new offloading location shall be submitted to the Secretary for approval prior to establishing or using a new offloading location.
- C. If mechanical harvesting is required to access an offloading location, no greater than a 20-foot-wide navigation channel leading directly to shore from the approved control location may be harvested.
- D. This permit does not relieve the permittee from the responsibility of obtaining all other approvals or permits that may be necessary to establish an offloading location.

8. Transport. Vehicles transporting harvested material to a disposal location shall be covered and shall not lose material during transport.

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9. Disposal. All harvested material shall be removed from the water and disposed at upland, non-wetland locations, including the Class II wetlands 50-foot buffer and the Class I wetlands 100-foot buffer, where harvested material cannot return to any waters.
10. Annual Report. By December 31st of each calendar year, the following shall be submitted to the Secretary:
 - A. An annual summary of mechanical harvesting operations.
 - B. A description of how the action threshold was developed and used for project implementation (condition a.4).
 - C. All qualitative aquatic plant survey maps produced that year (condition a.5).
 - D. All recordkeeping report forms (condition a.3.) from that calendar year.

b. Standard Conditions

1. Co-Permittee Status. Any individual or entity other than the permittee that is engaging in the permitted jurisdictional activity shall notify the Secretary to obtain co-permittee status prior to any such work. Notification of the addition or termination of co-permittee status shall occur using [a form provided by the Secretary](#). A co-permittee shall be subject to all terms and conditions in this permit.
2. Aquatic species spread prevention. Prior to entering and upon leaving the water, vessels, motor vehicles transporting vessels, trailers, and all other equipment being used to complete the project shall be inspected and any aquatic plants, aquatic plant parts, or aquatic nuisance species shall be removed and disposed of properly.
3. Modification. This permit may be modified or amended upon request by the permittee or by the Secretary. If the Secretary determines that modification is appropriate, only the conditions subject to modification shall be reopened. Any modification under this condition shall be pursuant to 10 V.S.A. Chapter 170 and any rules adopted thereunder.
4. Notice of Termination. The permittee may terminate the control activity as approved by this permit by submitting a notice of termination. The notice of termination shall include, at a minimum, the permit number for which termination is sought; the basis for the notice; the permittee's name and contact information; and a signed and dated certification statement by an authorized representative of the permittee confirming the notice of termination.
5. Rare, Threatened, or Endangered Species. Encounters with any rare, threatened, or endangered species not previously known to the control location shall be reported to the Secretary immediately. If determined necessary by the Secretary, an Endangered & Threatened Species Taking Permit, per 10 V.S.A. § 5408, shall be obtained prior to commencement or continuance of the control activity.
6. Duty to Comply and Enforcement. The permittee(s) shall comply with all terms and conditions of this permit. Any permit noncompliance shall constitute a violation of 10 V.S.A. § 1455 and may be cause for any enforcement action and revocation, modification, or suspension of the permit. It shall not be a defense for the permittee(s) in an enforcement action that it would have been necessary to halt or reduce the permitted activity to maintain compliance with the conditions of this permit.
7. Twenty-Four Hour Non-compliance Reporting. Unless provided otherwise by this permit, the permittee shall report any noncompliance which may endanger public health or the environment. Any such information shall be provided within 24 hours from the time the permittee becomes aware of the circumstances. A written submission shall also be provided within 5 days of the time the permittee becomes aware of the circumstances. The written submission shall contain a description of the noncompliance, its cause; the

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period of noncompliance including exact dates and times, and if the noncompliance has not been corrected, the anticipated time it is expected to continue; as well as steps taken or planned to reduce, eliminate, and prevent recurrence of the noncompliance.

8. Reporting & Correspondence. All requisite correspondence directed to the Secretary pertaining to this permit, including notifications, surveys and reports, shall be submitted via email to ANR.WSMDShoreland@vermont.gov or mailed to the following address:

Lake & Shoreland Permitting
Watershed Management Division
1 National Life Drive, Davis 3
Montpelier, VT 05620-3522
9. Compliance with Other Regulations. This permit does not relieve the permittee from obtaining all other approvals and permits prior to commencement of activity, or from the responsibility to comply with all other applicable federal, state, and local laws or regulations. In accordance with Fish and Wildlife Board Rule 641, adopted pursuant to 10 V.S.A. § 4145(a), a Special Use Permit from the Commissioner of Fish and Wildlife is required if a Vermont Department of Fish & Wildlife Access Area is used for the access of equipment or removal of aquatic plants associated with conducting an authorized control activity under this permit.
10. Duty to Reapply. If the authorized activity is anticipated to continue after the expiration date of this permit, the permittee shall reapply for coverage under a new permit at least 75 days prior to the expiration date of this permit.
11. Access to Property. By acceptance of this permit, the permittee agrees to allow representatives of the state of Vermont, at reasonable times and upon presentation of credentials, to enter upon the permittee's property, or to otherwise access the authorized control activity, to inspect to determine compliance with this permit.
12. Legal Responsibilities for Damages. The Secretary, by issuing this individual permit, accepts no legal responsibility for any damage direct or indirect of whatever nature and by whoever suffered arising out of the approved activity.
13. Reopener. If after granting this permit the Secretary determines that there is evidence indicating that an authorized activity does not comply with the requirements of 10 V.S.A. Chapter 50, the Secretary may reopen and modify this permit to include different limitations and requirements.
14. Revocation. This permit is subject to the conditions and specifications herein and may be suspended or revoked at any time for cause including: failure by the permittee to disclose all relevant facts during the application process which were known at that time; misrepresentation of any relevant fact at any time; non-compliance with the conditions and specifications of the permit; or a change in the factors associated with the control activity such that the Secretary can no longer make all applicable findings.
15. Rights and Privileges. This permit does not authorize any damage to public or private property or invasion of private rights or the violation of federal, state, or local laws or regulations. In addition, this permit does not convey any title or interest to the lands lying under public waters or waters affected.
16. Appeals. Pursuant to 10 V.S.A. Chapter 220, an aggrieved person shall not appeal this permit unless the person submitted to the Secretary a written comment during the applicable public comment period or an oral comment at the public meeting conducted by the Secretary. Absent a determination of the Environmental judge to the contrary, an aggrieved person may only appeal issues related to the person's comments to the Secretary as prescribed by 10 V.S.A. § 8504(d)(2). Pursuant to 10 V.S.A. Chapter 220 and

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the Vermont Rules for Environmental Court Proceedings, any appeal of this decision must be filed with the clerk of the Environmental Division of the Superior Court within 30 days of the date of the decision. The Notice of Appeal must specify the parties taking the appeal and the statutory provision under which each party claims party status; must designate the act or decision appealed from; must name the Environmental Division; and must be signed by the appellant or the appellant's attorney. The appeal must give the address or location and description of the property, project, or facility with which the appeal is concerned and the name of the applicant or any permit involved in the appeal. The appellant must also serve a copy of the Notice of Appeal in accordance with Rule 5(b)(4)(B) of the Vermont Rules for Environmental Court Proceedings. For further information, see the Vermont Rules for Environmental Court Proceedings available at www.vermontjudiciary.org. The address for the Environmental Division is: 32 Cherry Street; 2nd Floor, Suite 303; Burlington, VT 05401 Telephone #: 802-951-1740.

c. Findings

1. Jurisdiction - 10 V.S.A. § 1455(a). Within waters of the State, no person may use pesticides, chemicals other than pesticides, biological controls, bottom barriers, structural barriers, structural controls, or powered mechanical devices to control nuisance aquatic plants, insects, or other aquatic nuisances, including lamprey, unless that person has been issued a permit by the Secretary. The control activity, as described in Permit Application #4445-ANC-H, involves the use of a powered mechanical device (mechanical harvesting) to control nuisance aquatic plants within Lake Bomoseen, Castleton and Hubbardton, specifically, the area north of Float Bridge/Grady Bridge. Therefore, the Agency has jurisdiction under 10 V.S.A. Chapter 50.

2. Application Receipt & Review. An Aquatic Nuisance Control Individual Permit application submitted by the Lake Bomoseen Friends Up North and Town of Hubbardton (permittee) was received on January 14, 2025. Upon receipt of the application, the Secretary proceeded in accordance with the permit process as identified under 10 V.S.A. Chapter 170 and it was reviewed in accordance with the Department of Environmental Conservation's Permit Application Review Guidance, adopted March 14, 2019.

The Secretary can issue an Aquatic Nuisance Control permit for the use of a powered mechanical device in waters of the State for the control of nuisance aquatic plants pursuant to 10 V.S.A. § 1455 (f) if the following findings can be made:

- (1) there is acceptable risk to the non-target environment;
- (2) there is negligible risk to public health; and
- (3) there is either benefit to or no undue adverse effect upon the public good.

The Secretary has determined that findings c.5.-c.7. can be made. Therefore, the Secretary shall issue a permit for the use of a powered mechanical device in waters of the State for the control of nuisance aquatic plants.

3. Background; Aquatic Nuisance Control Permit History. Lake Bomoseen is a 2,415-acre waterbody that drains into an unnamed stream. Permitted control methods for aquatic nuisance species in Lake Bomoseen have included bottom barriers, powered mechanical devices, and biological controls (*Euhrychiopsis lecontei*). The following is a summary of active Aquatic Nuisance Control permits within Lake Bomoseen. Permits and records containing additional details on these control activities may be made available upon request.

- Bottom barriers: 2204-ANC (Expires 6/6/2027), 3114-ANC (Expires 4/30/2028), 3115-ANC (Expires 4/30/2028), 3133-ANC (Expires 4/30/2028), 3207-ANC (Expires 4/30/2028) 3256-ANC-B (Expires 3/4/2031), 3339-ANC (Expires 4/30/2028), 3342-ANC (Expires 4/30/2028), 3379-ANC (Expires

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4/30/2028), 3392-ANC (Expires 4/30/2028), 3480-ANC (Expires 4/30/2028), 3708-ANC (Expires 4/30/2028), 4101-ANC (Expires 4/30/2028)

- Powered Mechanical Devices: 2015-H01 (Expires 5/14/2025), 2015-H02 (Expires 5/14/2025), 2982-ANC-H, 3115-ANC (Expires 4/30/2028), 3255-ANC-H (Expires 3/4/2031), 3339-ANC (Expires 4/30/2028), 3342-ANC (Expires 4/30/2028), 3708-ANC (Expires 4/30/2028), 4101-ANC (Expires 4/30/2028)

4. Control Activity Purpose. Mechanical harvesting is the control activity approved by this permit. Mechanical harvesting is considered the use of a vessel (mechanical harvester) that mechanically removes aquatic plants from within the water column. The purpose of the control activity is to temporarily improve conditions for navigation, boat-related recreation, or swimming by harvesting nuisance aquatic plant populations near or at the surface of the water where nuisance aquatic plant populations impede those public good uses.

5. 10 V.S.A. § 1455(f)(1) – Non-target Environment. The Secretary considers the following as the non-target environment:

- Aquatic plants and animals within the waterbody.
- Wetlands within the waterbody.
- The ecological integrity of the waterbody, which is the culmination of how the biological, chemical, and physical integrity of the waterbody interact. The concept of ecological integrity is identified in the [Vermont Department of Environmental Conservation Watershed Management Division's Statewide Surface Water Management Strategy](#).

For determining what might be considered an acceptable risk to the non-target environment from the proposed control activity, the Secretary made several baseline assumptions related to the non-target environments potentially affected by the control activity:

- A control activity will have an impact on the ecological integrity of the waterbody as the non-target environment cannot be avoided completely.
- Mechanical harvesting temporarily reduces aquatic plant populations within the upper water column. This alters aquatic habitat within the harvested area by converting high-density aquatic plant communities with associated juvenile fish and macroinvertebrate communities to open water aquatic communities with adult fish, free-floating phytoplankton, and limited aquatic plants in the upper part of the water column.
- Mechanical harvesting of nuisance aquatic plants is predominantly a non-selective process. This results in the removal of native and non-native aquatic plant species, fish, macroinvertebrates, attached periphyton, reptiles, and amphibians within the targeted aquatic plant material.
- Mechanical harvesting can cause aquatic plants to fragment. Fragments of aquatic plants that are not collected by the mechanical harvester can contribute to the spread of aquatic plant species.
- Rare and threatened aquatic plant species have been recorded as being present in Lake Bomoseen. Species observed include Northern manna grass (S3), *Glyceria borealis*; whorled watermilfoil (SS23), *Myriophyllum verticillatum*; slender naiad (S1), *Najas gracillima*; Fries' pondweed (S3), *Potamogeton friesii*; blunt-leaf pondweed (S3), *Potamogeton obtusifolius*; straight-leaf pondweed (S3), *Potamogeton strictifolius*; marsh mermaid weed (S2), *Proserpinaca palustris*; small bur-reed (S2 – State Threatened), *Sparganium natans*; fruited bladderwort (S3), *Utricularia geminiscapa*; humped bladderwort (S3), *Utricularia gibba*; lesser bladderwort (S2), *Utricularia minor*; little floating bladderwort (S1), *Utricularia radiata*; and horned pondweed (S2), *Zannichellia palustris*. The State

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threatened *Sparganium natans* typically occurs along shorelines or in shallow wetlands where mechanical harvesting will not occur. Other species will be avoided by mechanical harvesting.

- Recorded populations of the Eastern Musk turtle/stinkpot (S2 – Special Concern – Species of Greatest Conservation Need), *Sternotherus odoratus*, Harlequin Darner (S2S3), *Gomphaeschna furcillata*; and Blacknose Shiner (S1 - Special Concern – Species of Greatest Conservation Need), *Notropis heterolepis* are known to occur in Lake Bomoseen.
- There are mapped Class II wetlands along sections of the shoreline in Bomoseen, which includes areas north of Float Bridge/Grady Bridge where this mechanical harvesting will occur. Additional wetlands may be present as defined by a dominance (>50% surface area coverage) of woody, emergent, or floating leaved vegetation anchored in sediment located in areas up to 6.5 feet deep. Examples of wetland vegetation include willow and alder shrubs, cattails, emergent bur-reed, emergent arrowhead/*Sagittaria* sp., and watershield/white water lily pads/spatterdock/floating leaved pondweeds.

Negative impacts on the non-target environment from mechanical harvesting includes temporary habitat alteration, the removal of native aquatic plant species, and the potential removal of rare, threatened, or endangered aquatic plant and aquatic animals. The presence of aquatic plants and the physical structure that they provide within the water column is required for fish and wildlife habitat. Aquatic plant beds provide habitat to reptiles, amphibians, juvenile fish, and macroinvertebrates. The removal and/or alteration of this habitat will negatively impact these communities and has the potential to cause an ecological regime shift from one dominated by rooted and floating aquatic plants to one dominated by phytoplankton. To reduce impacts on the non-target environment and maintain the ecological integrity of the control location while still allowing for the permittee to achieve the project purpose:

- Mechanical harvesting will occur between July 1st and September 30th only, to be protective of fish spawning as aquatic plants provide spawning nursery habitat.
- Mechanical harvesting will take place between the hours of 10:00 am and 5:00 pm only, to avoid times when the Musk Turtle is most active. Harvested material will be searched for turtles prior to transport and disposal of harvested material. Turtles found within the harvested material will be safely and immediately returned to the water.
- The minimum amount of mechanical harvesting that is needed to achieve the project purpose may occur within the areas identified in the figure title “Proposed Harvest Area” in the Approved Application. Mechanical harvesting is prohibited in Class II wetlands and the associated 50-foot wetland buffer except for the creation of the navigation channels identified in the figure title “Proposed Harvest Area” in the Approved Application or any aquatic plant removal completed in accordance with the Wetland Rules.
- Mechanical harvesting is not to directly disturb the lake bottom and large rocks, boulders, or large woody debris present in the waterbody will not be removed.
- To reduce the potential impact on emergent plant species and to rare, threatened, or endangered aquatic plants, mechanical harvesting is not permitted to remove emergent plant species nor is mechanical harvesting allowed to occur in waters less than three (3) feet of depth, unless approved otherwise. In addition, prior to mechanically harvesting, the approved control location will be searched for all rare, threatened, or endangered aquatic plant species known to occur in the waterbody. The Secretary may request a quantitative aquatic plant survey be conducted within the approved control location to ensure population locations and densities of S1, S1S2, S2, S2S3, and S3

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species are known and avoided. The permittee will report any observation of rare, threatened, or endangered species in accordance with this permit.

- The permittee will establish an action threshold. The action threshold will be considered the point at which mechanical harvesting is necessary to control aquatic plant populations that interfere with navigation, boat-related recreation, or swimming within the approved control location. Prior to mechanical harvesting beginning for the calendar year, a qualitative aquatic plant survey will be conducted of an area proposed to be harvested to assess aquatic plant densities. The survey will be used to determine whether and where the action threshold has been met. Mechanical harvesting will not occur until the action threshold has been met.
- To demonstrate measures to reduce impacts on the non-target environment have been followed, a summary of mechanical harvesting, daily mechanical harvesting report form(s), and all qualitative aquatic plant surveys will be submitted to the Secretary annually.

While the Secretary recognizes that native organisms may be adversely impacted by the control activity, it is not anticipated that undue adverse impacts to the non-target environment will occur if this control activity is conducted in accordance with this permit. The Secretary has determined that there is an acceptable risk to the non-target environment.

6. 10 V.S.A. § 1455(f)(2) – Public Health. It is recommended that mechanical harvesting not occur while people other than the workers associated with the project are in the immediate area being harvested. Provided mechanical harvesting occurs in accordance with the conditions of this permit, the Secretary has determined that there is negligible risk to public health.
7. 10 V.S.A. § 1455(f)(3) – Public Good. The Secretary considered the following criteria in determining whether there is either benefit to or no undue adverse effect upon the public good from carrying out the control activity:
 - Whether carrying out the control activity produces tangible benefits to public good uses, such as boating, fishing, and swimming, that outweigh potential impacts on the water resource.
 - Assessment: Tangible benefits to be achieved in the waterbody are likely to be associated with the temporary decrease in the biomass of aquatic plants at or near the surface of the water. This temporary decrease is anticipated to result in a tangible benefit for boating or swimming within the control location. By following the measures to reduce impacts on the non-target environment as described in finding c.5., the temporary benefits to public good uses are anticipated to outweigh potential impacts on the water resource.
 - Whether the potential cumulative impacts from carrying out the control activity adversely affects the water resource and the public that utilizes that resource.
 - Assessment: Additional cumulative impacts were considered that relate to the water resource and how the public may utilize that resource. The Secretary has determined that the cumulative impacts from carrying out the control activity are not anticipated to affect the water resource and the public that utilizes that resource.
 - There are no recommended water use restrictions for the waterbody when mechanical harvesting occurs.
 - Whether measures to reduce impacts on the water resource have been taken.
 - Assessment: Mechanical harvesting will occur in accordance with the protective measures as described in finding c.5. of this permit. To ensure compliance with this permit and to assess

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any unforeseen or unanticipated adverse impacts on the resource or public good that may have resulted from the control activity, the findings made in this permit may be reviewed annually upon receiving the annual report.

- Whether the control activity is excessive for the stated purpose.
 - Assessment: Provided mechanical harvesting occurs in accordance with the conditions of this permit, the control activity is not considered excessive for the stated purpose.

Based upon the findings above, the Secretary finds that there is no undue adverse effect upon the public good from mechanical harvesting when used in accordance with this permit and the Approved Application.

d. Authorization

By delegation from the Secretary, the Vermont Department of Environmental Conservation has made a determination that the above activity qualifies for an individual aquatic nuisance control permit. The permittees are authorized per 10 V.S.A. § 1455(i) subject to the conditions herein specified.

This permit shall be effective on the day of signing and expire ten years thereafter.

Julia S. Moore, Secretary
Vermont Agency of Natural Resources

By: _____
Peter LaFlamme, Director
Watershed Management Division