

**From:** [REDACTED] <[REDACTED]@formstack.com>  
**Sent:** Wednesday, July 29, 2015 4:23 PM  
**To:** RegReform (ANF)  
**Subject:** A Clearer Code: Regulatory Reform

**Categories:** Red Category

## Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 07/29/15 4:22 PM

**Name (optional)::** David Ginsburg

**Company/Organization (if applicable) (optional)::**

**Address (optional)::** [REDACTED]

**Primary Phone (optional)::** [REDACTED]

**Email (optional)::** [REDACTED]

**CMR Number (If known): :** 1-AHO-05

**General Regulatory Themes::** Other

**Please list the Agency or Agencies affiliated with this regulation::** MA Dept. Agricultural Resource

**Describe the regulatory issue or observation::** Isolation quarantine for importing dogs into MA for the purposes of sale or adoption  
Suggestions for easing regulatory compliance: supporting House Bill H649

**Suggestions for easing regulatory compliance::** Allow legal adoption of rescue dogs in Massachusetts! Dogs are pets, not livestock. A distinction needs to be made to ease the ability for foster & rescue pet owners to bring dogs into Massachusetts.

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**From:** noreply@formstack.com  
**Sent:** Wednesday, July 29, 2015 4:42 PM  
**To:** RegReform (ANF)  
**Subject:** A Clearer Code: Regulatory Reform

x

## Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 07/29/15 4:41 PM

**Name (optional)::** Michele Fox

**Company/Organization (if applicable) (optional)::**

**Address (optional)::**

**Primary Phone (optional)::**

**Email (optional)::**

**CMR Number (If known): :** 1-AHO-05

**General Regulatory Themes::** Other

**Please list the Agency or Agencies affiliated with this regulation::** MA Dept. Agricultural Resource

**Describe the regulatory issue or observation::** Isolation/observation: Isolation quarantine for importing dogs into MA for the purposes of sale or adoption

**Suggestions for easing regulatory compliance::** Supporting House Bill H649

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**From:** noreply@formstack.com  
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**To:** RegReform (ANF)  
**Subject:** A Clearer Code: Regulatory Reform

## Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 07/29/15 5:23 PM

**Name (optional)::** Alicia Kessler

**Company/Organization (if applicable) (optional)::**

**Address (optional)::**

**Primary Phone (optional)::**

**Email (optional)::**

**CMR Number (If known): :** Emergency Order 1-AHO-05

**General Regulatory Themes::** Other

**Please list the Agency or Agencies affiliated with this regulation::** MA Dept of Agriculture Resource

**Describe the regulatory issue or observation::** Isolation quarantine for importing dogs into MA for the purpose of sale or adoption

**Suggestions for easing regulatory compliance::** Support House Bill H649

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**From:** noreply@formstack.com  
**Sent:** Friday, July 31, 2015 2:07 PM  
**To:** RegReform (ANF)  
**Subject:** A Clearer Code: Regulatory Reform

**Categories:** Red Category



## Formstack Submission for form A Clearer Code: Regulatory Reform

*Submitted at 07/31/15 2:07 PM*

**Name (optional)::**

**Company/Organization (if applicable) (optional)::**

**Address (optional)::**

**Primary Phone (optional)::**

**Email (optional)::**

**CMR Number (If known): :** 310 CMR 36.00

**General Regulatory Themes::** Environmental Protection

**Please list the Agency or Agencies affiliated with this regulation::** Executive Office of Energy and Environmental Affairs  
DEP  
Water Resources Commission

**Describe the regulatory issue or observation::** MassDEP promulgated revised Water Management Act regulations on Nov. 7, 2014. The new requirements for minimizing the impact of water withdrawals and mitigated additional water withdrawals above a historic baseline will be costly for PWS to comply. Money better spent on infrastructure upgrades which will have a visible and sustainable effect on environmental improvement.

**Suggestions for easing regulatory compliance::** Drop the concept of baseline from regulations as it is arbitrary and goes well beyond what MGL 21G contemplated. Require mitigation where stream flow will be actually impacted, not just a perceived impact. One size does not fit all.

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**From:** [REDACTED] <[REDACTED]@formstack.com>  
**Sent:** Friday, July 31, 2015 5:55 PM  
**To:** RegReform (ANF)  
**Subject:** A Clearer Code: Regulatory Reform  
**Categories:** Red Category

## Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 07/31/15 5:55 PM

<b>Name (optional)::</b>	John Dougherty
<b>Company/Organization (if applicable) (optional)::</b>	Briggs Stable, LLP, Hanover, MA Mass Farm Bureau Equine Advisory Committee, Chair
<b>Address (optional)::</b>	[REDACTED] [REDACTED]
<b>Primary Phone (optional)::</b>	[REDACTED]
<b>Email (optional)::</b>	[REDACTED]
<b>CMR Number (If known): :</b>	330 Section 16.02
<b>General Regulatory Themes::</b>	Licensing and Permitting
<b>Please list the Agency or Agencies affiliated with this regulation::</b>	Department of Agricultural Resources, DAR
<b>Describe the regulatory issue or observation::</b>	Teaching horseback riding in Massachusetts requires a license. Mass. is the only state to require such. It is the opinion of a majority of the instructors in the state that being licensed does not improve the teaching ability of the holder or contribute to the health and safety of the students or the horses. The insurance industry finds no redeeming factor in requiring it. The insurance industry has seen no apparent change in claims since the inception of the program. It deters those who are qualified to teach from doing so. No cost benefit can be shown or at least is negligible. The state is unable to insure licensing of all without extra staff at DAR. The economics of the industry doesn't support this. Staff would be better assigned to other duties. Massachusetts is recognized nationally for the quality of its horses and riders. Licensing does not cause this to happen. DAR has done much for the agricultural industry and the equine community.
<b>Suggestions for easing regulatory compliance::</b>	Massachusetts Farm Bureau passed a resolution to remove the requirement to obtain a state license from the statutes, 330CMR Section 16.02. There is a bill in committee to accomplish this. Support from the House, Senate, DAR and the Governor is needed to accomplish passage of the bill.

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**From:** [REDACTED] <noreply+004b9ee676335c3d@formstack.com>  
**Sent:** Thursday, September 03, 2015 3:48 PM  
**To:** RegReform (ANF)  
**Subject:** A Clearer Code: Regulatory Reform  
**Categories:** Red Category

## Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 09/03/15 3:47 PM

**Name (optional)::** Richard Bourgault

**Company/Organization (if applicable) (optional)::** A & B INSURANCE GROUP, LLC

**Address (optional)::** [REDACTED]  
[REDACTED]  
[REDACTED]

**Primary Phone (optional)::** [REDACTED]

**Email (optional)::** [REDACTED]

**CMR Number (If known): :** 330CMR16.02

**General Regulatory Themes::** Licensing and Permitting

**Please list the Agency or Agencies affiliated with this regulation::** Department of Agricultural Resources

**Describe the regulatory issue or observation::** The licensing of horseback riding instructors. No other state in the country has this requirement. It serves no purpose as it has never had any enforcement behind it. The state exam is a joke and in no way can tell a good instructor from a bad one. It also causes a problem for the insurance industry. First there is no difference in the claim results between Massachusetts and the other New England states that have no licensing requirement. There is no evidence that Massachusetts licensed riding instructors are better or safer than instructors from other non licensing states. We also have the problem that if a persons license doesn't renew and a claim happens during the gap in licensing, you have taken away the insurance companies ability to defend it's client. The company has to go right to looking at a settlement, because at the time of the claim the instructor was unlicensed.

**Suggestions for easing regulatory compliance::** Through out the requirement for Horseback riding instructors to be licensed, and get in step with the rest of the country.

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**To:** RegReform (ANF)  
**Subject:** A Clearer Code: Regulatory Reform

**Categories:** Red Category

## Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 09/03/15 3:48 PM

**Name (optional)::**

**Company/Organization (if applicable) (optional)::**

**Address (optional)::**

**Primary Phone (optional)::**

**Email (optional)::**

**CMR Number (If known): :**

**General Regulatory Themes::** Licensing and Permitting

**Please list the Agency or Agencies affiliated with this regulation::** Department of Agricultural Resources

**Describe the regulatory issue or observation::**

The licensing of horseback riding instructors. No other state in the country has this requirement. It serves no purpose as it has never had any enforcement behind it. The state exam is a joke and in no way can tell a good instructor from a bad one. It also causes a problem for the insurance industry. First there is no difference in the claim results between Massachusetts and the other New England states that have no licensing requirement. There is no evidence that Massachusetts licensed riding instructors are better or safer than instructors from other non licensing states. We also have the problem that if a persons license doesn't renew and a claim happens during the gap in licensing, you have taken away the insurance companies ability to defend it's client. The company has to go right to looking at a settlement, because at the time of the claim the instructor was unlicensed.

**Suggestions for easing regulatory compliance::**

Through out the requirement for Horseback riding instructors to be licensed, and get in step with the rest of the country.

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**From:** [REDACTED] <noreply+159dc6870c9a5c99@formstack.com>  
**Sent:** Thursday, September 03, 2015 9:36 PM  
**To:** RegReform (ANF)  
**Subject:** A Clearer Code: Regulatory Reform

**Categories:** Red Category

Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 09/03/15 9:35 PM

**Name (optional)::** Judi O'Neil

**Company/Organization (if applicable) (optional)::** Hybrid Farm

**Address (optional)::** [REDACTED]

**Primary Phone (optional)::**

**Email (optional)::** [REDACTED]

**CMR Number (If known): :** 330 CMR 16

**General Regulatory Themes::** Other

**Please list the Agency or Agencies affiliated with this regulation::** Horseback Riding Instructors  
Farm Bureau

**Describe the regulatory issue or observation::**

Horse back riding instructors licenses obtained by taking a written test is not a good way to tell if someone can teach a skill with a breathing, sometimes opinionated being. Either the licensing needs to be done by observation or dropped. Some good instructors do not test well and some can guess the answers on a true-false, multiple choice format. Some of the test questions are not well written. There is no respectability that is recognized throughout the horse world because you have a Massachusetts Instructors License.

**Suggestions for easing regulatory compliance::**

I think the instructors should be registered and a safety record should be kept on each of them. That would be more valuable to non- horsey parents looking for a safe place for their child to ride.

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**Sent:** Friday, September 04, 2015 8:48 AM  
**To:** RegReform (ANF)  
**Subject:** A Clearer Code: Regulatory Reform

**Categories:** Red Category

## Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 09/04/15 8:47 AM

**Name (optional)::** Krystine O'Connor

**Company/Organization (if applicable) (optional)::**

**Address (optional)::** [REDACTED]

**Primary Phone (optional)::** [REDACTED]

**Email (optional)::** [REDACTED]

**CMR Number (If known): :** 330 CMR 16.02

**General Regulatory Themes::** Licensing and Permitting

**Please list the Agency or Agencies affiliated with this regulation::** Department of Agricultural Resources

**Describe the regulatory issue or observation::**

I feel that the requirement to have a riding instructor licensed in the state of Massachusetts should be done away with. there is only 1 other state to my knowledge that requires this. it does not show a potential client any value. it doesn't prove the ability of the instructor as it is only book knowledge, but yet they are required to take a test to pass.

My daughter has been involved with the United States Pony Club since she as 8 years old. In the last 10 years this program had gone above and beyond in teaching her to be a competent able young horse woman fully capable of teaching other as that is a requirement as the members progress though this program. once a member has graduated Pony Club at the highest rating they would have had the equivalent of receiving their masters in animal science. there are many programs instructors can participate to continue their education in teaching people how to ride horses. I feel that programs like Pony Club hold much more weight than a state test with a license. if you want to take a look at the pony club program their website is [www.ponyclub.org](http://www.ponyclub.org)

**Suggestions for easing regulatory compliance::**

I vote to do away with the licensing of instructors in the state of Massachusetts it has no value

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**From:** [REDACTED] <noreply+a6d90c86a3587d05@formstack.com>  
**Sent:** Wednesday, July 08, 2015 10:47 AM  
**To:** RegReform (ANF)  
**Subject:** A Clearer Code: Regulatory Reform



## Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 07/08/15 10:47 AM

**Name (optional)::** Mark Mooney

**Company/Organization (if applicable) (optional)::** Liberty Mutual Insurance

**Address (optional)::**

**Primary Phone (optional)::**

**Email (optional)::**

**CMR Number (If known): :** 522 CMR 1-18, 520 CMR 5, 520 CMR 6

**General Regulatory Themes::** Building Codes/Accessibility Standards

**Please list the Agency or Agencies affiliated with this regulation::** Department of Public Safety

**Describe the regulatory issue or observation::**

**Suggestions for easing regulatory compliance::**

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**From:** [REDACTED] <[REDACTED]noreply+ccedf2ff98a56ca3@formstack.com>  
**Sent:** Friday, June 19, 2015 11:06 AM  
**To:** [REDACTED]  
**Subject:** Regulatory Review

**Categories:** Red Category



## Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 06/19/15 11:06 AM

**Name (optional)::** Michael Lombardo

**Company/Organization (if applicable) (optional)::** Town of Hamilton, MA

**Address (optional)::** [REDACTED]

**Primary Phone (optional)::** [REDACTED]

**Email (optional)::** [REDACTED]

**CMR Number (If known): :** 310 CMR 36

**General Regulatory Themes::** Environmental Protection

**Please list the Agency or Agencies affiliated with this regulation::** Massachusetts Department of Environmental Protection - Bureau of Resource Protection

**Describe the regulatory issue or observation::** Water Resource Management Program adopted regulations are ambiguous, unsupported by scientific fact and methodology, punitive, and in various instances contrary to decisions made by the Supreme Judicial Court.

I would be happy to provide a copy of the Town's written comments on SWMI and may be reached at the email address above for follow up.

**Suggestions for easing regulatory compliance::**

Suspend enactment of SWMI and open a true dialogue with Town's and other stakeholders to develop legislation and regulations supported by scientific fact and reasonable expectations.

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**Sent:** Thursday, July 09, 2015 4:27 PM  
**To:** RegReform (ANF)  
**Subject:** A Clearer Code: Regulatory Reform  
**Categories:** Red Category

## Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 07/09/15 4:27 PM

<b>Name (optional)::</b>	Charles Aspinwall
<b>Company/Organization (if applicable) (optional)::</b>	Town of Millis
<b>Address (optional)::</b>	[REDACTED]
<b>Primary Phone (optional)::</b>	[REDACTED]
<b>Email (optional)::</b>	[REDACTED]
<b>CMR Number (If known): :</b>	333 CMR 11.00.
<b>General Regulatory Themes::</b>	Building Codes/Accessibility Standards
<b>Please list the Agency or Agencies affiliated with this regulation::</b>	MA Dept. of Agricultural Resources
<b>Describe the regulatory issue or observation::</b>	A town that desires to spray weedkiller in sidewalks must apply for a permit from DAR annually in order to do this. I can spray weedkiller in my own yard but a town can't do so without a permit from DAR. The regulation is burdensome and is outdated. Town should be allowed to do so without a regulation that requires that a Yearly Operational Plan be developed, that a five year Vegetation Management Plan be developed, that a hearing be held, and that approvals are required to do such work. If I can go to a local hardware store and buy weedkiller for my private property without such requirements municipalities should be able to do the same.
<b>Suggestions for easing regulatory compliance::</b>	Eliminate the requirements for Yearly Operational Plans, Vegetation Management Plans and for hearings. Allow licensed applicators to make reasonable decisions to apply herbicides in a reasonable manner. They are licensed by the state already.

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**From:** [REDACTED] <[REDACTED]@formstack.com>  
**Sent:** Saturday, July 11, 2015 6:21 PM  
**To:** RegReform (ANF)  
**Subject:** A Clearer Code: Regulatory Reform  
**Categories:** Red Category

**Formstack Submission for form A Clearer Code: Regulatory Reform**

*Submitted at 07/11/15 6:21 PM*

**Name (optional)::** Dean Johnson

**Company/Organization (if applicable) (optional)::** Johnson & Sons Poultry Farm, Inc.

**Address (optional)::** [REDACTED]

**Primary Phone (optional)::** [REDACTED]

**Email (optional)::** [REDACTED]

**CMR Number (If known): :** 310CMR10

**General Regulatory Themes::** Environmental Protection

**Please list the Agency or Agencies affiliated with this regulation::** Town of Westminster Conservation Commission  
Mass DEP

**Describe the regulatory issue or observation::** Our local ConComm is not operating under the written regulations of 310CMR10, but are making up their own procedures and regulations, they say because their job is to 'protect wetlands.'

**Suggestions for easing regulatory compliance::** Train municipal ConComms about accepted agricultural practices in 100' buffer areas of wetlands. Stress that they have to follow the law the way it was written. If they want to make changes, they should push for bills or amendments at The State House.

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**From:** [REDACTED]noreply+463acc67c47be398@formstack.com>  
**Sent:** Monday, July 13, 2015 11:29 PM  
**To:** RegReform (ANF)  
**Subject:** A Clearer Code: Regulatory Reform

**Categories:** Red Category

## Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 07/13/15 11:29 PM

**Name (optional)::** Amanda Nash

**Company/Organization (if applicable) (optional)::**

**Address (optional)::** [REDACTED]

**Primary Phone (optional)::**

**Email (optional)::** [REDACTED]

**CMR Number (If known): :**

**General Regulatory Themes::** Energy and Utilities

**Please list the Agency or Agencies affiliated with this regulation::** Department of Public Utilities  
also FERC (federal, I know, but same comment applies)

**Describe the regulatory issue or observation::**

What I think is way more important than the state speaking with one voice is REGULATORY AGENCIES DEFENDING THE CITIZENS. The DPU and FERC are so CLEARLY championing the interests of the corporations that stand to gain from the proposed gas pipelines, NOT the voters/taxpayers of Massachusetts. WE DO NOT WANT THEIR DIRTY, DANGEROUS PIPELINE IN WESTERN MASSACHUSETTS. This is where your FOOD comes from! In particular, this is where most of your ORGANIC food comes from. We have clean rivers and beautiful farmland and countryside. DO NOT RAM THIS PIPELINE DOWN OUR THROATS. We all know that the vast majority is going to be shipped overseas to line the pockets of the corporations, we all know that very little of it is going to be used in Mass, even tho' that is the excuse for building it here. FERC and the DPU have heard countless reasons to deny permits to these projects. ACT ON OUR BEHALF, MR BAKER, not on behalf of Richard Kinder, the crook that got away from Enron, and Iberdrola, the Spanish multinational.  
Amanda Nash  
Conway, MA

**Suggestions for easing regulatory compliance::**

**From:** noreply@formstack.com  
**Sent:** Tuesday, July 14, 2015 10:50 AM  
**To:** RegReform (ANF)  
**Subject:** A Clearer Code: Regulatory Reform

**Categories:** Red Category



## Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 07/14/15 10:50 AM

**Name (optional)::**

**Company/Organization (if applicable) (optional)::**

**Address (optional)::**

**Primary Phone (optional)::**

**Email (optional)::**

**CMR Number (If known): :**

**General Regulatory Themes::** Building Codes/Accessibility Standards

**Please list the Agency or Agencies affiliated with this regulation::** DPS and DOER

**Describe the regulatory issue or observation::** The existing situation with the stretch code cities/towns adhering to 2009 IECC when the 2012 IECC was released created much confusion and basically negated the stretch code being a true "stretch code" as it was not more energy efficient than the 2012 IECC.

**Suggestions for easing regulatory compliance::** Going forward, the stretch code must always be more energy efficient than the main energy code set in statute. For instance, when the State adopts the 2015 IECC as well as the 2018 IECC (in the future), the stretch code should be updated each time and strive to be 10%-20% more efficient than the base code. Make this clear and simple for practioners and citizens.....not confusing and illogical.

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**Sent:** Tuesday, July 14, 2015 11:33 AM  
**To:** RegReform (ANF)  
**Subject:** A Clearer Code: Regulatory Reform

**Categories:** Red Category

## Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 07/14/15 11:32 AM

**Name (optional)::** Seth Jaffe

**Company/Organization (if applicable) (optional)::** Foley Hoag LLP

**Address (optional)::**

**Primary Phone (optional)::** [REDACTED]

**Email (optional)::** [REDACTED]

**CMR Number (If known) :** 310 CMR 40.0000, 314 CMR 3.00

**General Regulatory Themes::** Environmental Protection

**Please list the Agency or Agencies affiliated with this regulation::** DEP.

**Describe the regulatory issue or observation::**

1. The DEP cleanup regulations known as the MCP, 310 CMR 40.0000 contain several provisions that are inconsistent with the overall risk-based cleanup approach that the MCP is intended to implement. All provisions of the MCP that are not risk-based should be reviewed.

2. Massachusetts is one of the few states in the country that operates its own surface water discharge permitting program separate from the federal EPA NPDES program. DEP should consider assuming delegation of the federal NPDES program, in order to eliminate duplicative regulation.

**Suggestions for easing regulatory compliance::**

On the MCP, there are at least three separate provisions or groups of provisions that should be reviewed and potentially revised or eliminated:

1. Provisions dealing with substantial release migration
2. Upper concentration limits.
3. Any method 1 cleanup standards that are more stringent than federal standards under CERCLA.

Regarding surface water discharge permits, the only fix is to assume implementation of the federal program.

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**Subject:** A Clearer Code: Regulatory Reform

**Categories:** Red Category

## Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 07/14/15 3:20 PM

**Name (optional)::** Ernest Walen

**Company/Organization (if applicable) (optional)::** Heatbath Corporation

**Address (optional)::** [REDACTED]

**Primary Phone (optional)::** [REDACTED]

**Email (optional)::** [REDACTED]

**CMR Number (If known): :**

**General Regulatory Themes::** Environmental Protection

**Please list the Agency or Agencies affiliated with this regulation::** TURA

**Describe the regulatory issue or observation::**

This law is redundant with Federal law. We are forced to pay high fees and file useless reports. TURP is required to take 20 hours of education every two years. The whole thing is stupid and a major factor for me selling my business to a company out of Ohio. They will eventually close the Springfield MA operation. Twenty-Five (25) people will lose their jobs. TURA people will never tell you that. Heatbath has been around since 1923, what a shame to be made to feel unwanted. Well, we're GONE!

**Suggestions for easing regulatory compliance::**

IF you can't repeal TURA atleast: Eliminate or reduce reporting, reduce fees, Eliminate the need for TURP's to sign off on the reports, if you can't get rid of TURP's eliminate the continuing education requirement. TURA maintains a "Cleaner Laboratory". This is an insult as many companies will perform the same service, usually at no charge with the hope of selling product. Why does the State need to pay a person(s) in Lowell to do the work.

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**Sent:** Tuesday, July 14, 2015 4:04 PM  
**To:** RegReform (ANF)  
**Subject:** A Clearer Code: Regulatory Reform  
**Categories:** Red Category

**Formstack Submission for form A Clearer Code: Regulatory Reform**

*Submitted at 07/14/15 4:04 PM*

**Name (optional)::** Wagdy Anis

**Company/Organization (if applicable) (optional)::** ANIS BUILDING ENCLOSURE CONSULTING

**Address (optional)::** [REDACTED]

**Primary Phone (optional)::** [REDACTED]

**Email (optional)::** [REDACTED]

**CMR Number (If known): :** 780 CMR Chapter 13 and Appendix AA of MA amendment

**General Regulatory Themes::** Building Codes/Accessibility Standards

**Please list the Agency or Agencies affiliated with this regulation::** DPS/BBRS

**Describe the regulatory issue or observation::** The stretch code was enacted years ago based on IECC 2009 and has fallen behind the standard energy code (IECC 2012 with amendments. We need to adopt a new stretch code that is more advanced than the standard energy code since half the towns have adopted the stretch code.

**Suggestions for easing regulatory compliance::** Adopt the draft stretch code that has been prepared for the BBRS and start working on the IECC 2015 version as well.

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**Sent:** Tuesday, July 14, 2015 4:40 PM  
**To:** RegReform (ANF)  
**Subject:** A Clearer Code: Regulatory Reform  
**Categories:** Red Category

## Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 07/14/15 4:39 PM

<b>Name (optional)::</b>	Earle Baldwin
<b>Company/Organization (if applicable) (optional)::</b>	would it improve my status?
<b>Address (optional)::</b>	[REDACTED]
<b>Primary Phone (optional)::</b>	
<b>Email (optional)::</b>	[REDACTED]
<b>CMR Number (If known) :</b>	So many
<b>General Regulatory Themes::</b>	Environmental Protection
<b>Please list the Agency or Agencies affiliated with this regulation::</b>	<p>The incursion of private project into legally preserved land and the invasion of privately held domain is unforgivable. A Governor who professes to adhere to principles on the moderate right cannot ethically support this severe right or severe left tactic.</p> <p>When one losses their core for whatever expediency, insanity or remorse awaits.</p> <p>We have safe and available corridors for pipelines of any sort. Immediate profit hidden within the facade of public need has launch so many boondoggles that the tally is suffocation.</p> <p>This modern era however, allows complete and immediate exposition of folly and corruption. It is a very poor time to lose ones way.</p>
<b>Describe the regulatory issue or observation::</b>	Incursion of Natural gas pipeline into protected water lands accross the northern tier of the Commonwealth.
<b>Suggestions for easing regulatory compliance::</b>	<p>I am suggesting maintaining legal agreement with the citizen. Relieving impediments to everyone in executing projects to provide for future energy need.</p> <p>Reawaken scientific inquiry into Nuclear powered generation. Empower the institutes of the physical sciences to pioneer. Stop supporting wagon trains and slave powered economies.</p>

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**From:** noreply@formstack.com  
**Sent:** Wednesday, July 15, 2015 7:12 AM  
**To:** RegReform (ANF)  
**Subject:** A Clearer Code: Regulatory Reform

**Categories:** Red Category

## Formstack Submission for form A Clearer Code: Regulatory Reform

*Submitted at 07/15/15 7:12 AM*

**Name (optional)::**

**Company/Organization (if applicable) (optional)::**

**Address (optional)::**

**Primary Phone (optional)::**

**Email (optional)::**

**CMR Number (if known): :**

**General Regulatory Themes::**

Environmental Protection

**Please list the Agency or Agencies affiliated with this regulation::**

DEP

**Describe the regulatory issue or observation::**

Catch Basin Grit as a solid waste

**Suggestions for easing regulatory compliance::**

Once tested, catch basin grit should be re-determined as solid waste or general fill

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**From:** [REDACTED]noreply+ec1cd151046e7864@formstack.com>  
**Sent:** Wednesday, July 15, 2015 7:15 AM  
**To:** RegReform (ANF)  
**Subject:** A Clearer Code: Regulatory Reform

**Categories:** Red Category

## Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 07/15/15 7:14 AM

**Name (optional)::** Marc Pelissier

**Company/Organization (if applicable) (optional)::** Valley Plating, Inc.

**Address (optional)::** [REDACTED]

**Primary Phone (optional)::** [REDACTED]

**Email (optional)::** [REDACTED]

**CMR Number (If known): :**

**General Regulatory Themes::** Building Codes/Accessibility Standards

**Please list the Agency or Agencies affiliated with this regulation::** Department of Environmental Protection  
Toxic Use Reduction Act

**Describe the regulatory issue or observation::** When conceived in 1987, the TURA program was designed to be a 5 year program. what we have now is nothing but an entrenched bureaucracy that is nothing but an unnecessary financial burden on select Massachusetts businesses that no longer yields worthwhile environmental benefits. The ongoing accomplishments in industry associated with toxic use reduction is the result of sound business practices in the private sector and nothing to do with the regulatory requirements mandated by the TURA program. Global changes in the market place over the years have forced private industry to adopt lean technologies which include eliminating waste. The first 5 years of the program, our company paid \$24,000.00 in fees. From 1993 to present, we have paid approx \$123,000.00 in fees and have nothing to show for it.

**Suggestions for easing regulatory compliance::** Phase out the regulation and fee system. Maintain the Office of Technical Assistance and establish a reasonable fee system to fund it.

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**From:** [REDACTED] <noreply+4645bf7249713674@formstack.com>  
**Sent:** Wednesday, July 15, 2015 1:44 PM  
**To:** RegReform (ANF)  
**Subject:** A Clearer Code: Regulatory Reform

**Categories:** Red Category

[REDACTED]

## Formstack Submission for form A Clearer Code: Regulatory Reform

*Submitted at 07/15/15 1:43 PM*

**Name (optional)::** John Livermore

**Company/Organization (if applicable) (optional)::** Boston Solar

**Address (optional)::** [REDACTED]

**Primary Phone (optional)::** [REDACTED]

**Email (optional)::** [REDACTED]

**CMR Number (If known): :**

**General Regulatory Themes::** Building Codes/Accessibility Standards

**Please list the Agency or Agencies affiliated with this regulation::** Department of Public Utilities

**Describe the regulatory issue or observation::** Net metering caps are placing a ball and chain on large solar development in MA.

**Suggestions for easing regulatory compliance::** Please eliminate the Net Metering caps and the MA ACA.

Thank you!

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[REDACTED]

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**From:** [REDACTED] <[REDACTED]+6c0eef1df16db495@formstack.com>  
**Sent:** Friday, July 17, 2015 6:57 AM  
**To:** RegReform (ANF)  
**Subject:** A Clearer Code: Regulatory Reform  
**Categories:** Red Category

 **Formstack Submission for form A Clearer Code: Regulatory Reform**

*Submitted at 07/17/15 6:57 AM*

**Name (optional)::** Richard Lawlor

**Company/Organization (if applicable) (optional)::** Town of Yarmouth

**Address (optional)::** [REDACTED]

**Primary Phone (optional)::** [REDACTED]

**Email (optional)::** [REDACTED]

**CMR Number (If known): :**

**General Regulatory Themes::** Environmental Protection

**Please list the Agency or Agencies affiliated with this regulation::** Environmental, Agriculture, Safety, Labor, Conservation, Recreation, Coastal, Energy, Water Resources, Wetlands and Recreation

**Describe the regulatory issue or observation::** Regulations affecting plant nutrient, pesticides and water protection in agriculture are redundant and grant passes to the primary cause. Our regulators are biased and unforgiving in their process.

**Suggestions for easing regulatory compliance::** Education. There is no credit for the road we have traveled, learned and adjusted our practices thus far. Our culture has come a long way in valuing and protecting our natural resources.

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**From:** [REDACTED]  
**Sent:** Wednesday, July 15, 2015 10:39 AM  
**To:** RegReform (ANF)  
**Subject:** A Clearer Code: Regulatory Reform

**Categories:** Red Category

## Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 07/15/15 10:38 AM

**Name (optional)::**

**Company/Organization (if applicable) (optional)::**

**Address (optional)::**

**Primary Phone (optional)::**

**Email (optional)::**

**CMR Number (If known): :** 310 CMR 36

**General Regulatory Themes::** Environmental Protection

**Please list the Agency or Agencies affiliated with this regulation::** EOE / DEP / DCR

**Describe the regulatory issue or observation::**

The Water Management Act is going to prove to be a significant burden not only to water suppliers but to their customers and communities. Making water suppliers pay for storm water improvements and mitigation is a shifting the burden of funding for projects that should come out of DCRs budget and taking money away from water infrastructure projects that are so desperately needed. It is putting a huge restraint of water suppliers on Cape Cod; communities are being told in the future they cannot pump more than 2010 levels. The Cape is an unassessed basin; they should not be held to the same standards as watersheds that are stressed. This Act has cost water suppliers hundreds of thousands of dollars. Homeowners should have the right to irrigate their plantings if adequate water is available. Limiting homeowners to 65 gallons per capita per day usage is ridiculous; electricity and gas is not rationed.

**Suggestions for easing regulatory compliance::**

Public water suppliers in non-stressed basins should not be treated the same as stressed basins (such as the Ipswich)

Public water suppliers in unassessed basins should be exempted.

Visitors to Cape Cod should bring their own water for drinking, bathing, and cooking. How will that go over?

[REDACTED]

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**From:** [REDACTED] <[REDACTED]@formstack.com>  
**Sent:** Wednesday, July 15, 2015 11:43 AM  
**To:** RegReform (ANF)  
**Subject:** A Clearer Code: Regulatory Reform

**Categories:** Red Category

 **Formstack Submission for form A Clearer Code: Regulatory Reform**

Submitted at 07/15/15 11:43 AM

<b>Name (optional)::</b>	Jane Winn
<b>Company/Organization (if applicable) (optional)::</b>	Berkshire Environmental Action Team, Inc. (BEAT)
<b>Address (optional)::</b>	[REDACTED]
<b>Primary Phone (optional)::</b>	[REDACTED]
<b>Email (optional)::</b>	[REDACTED]
<b>CMR Number (If known): :</b>	
<b>General Regulatory Themes::</b>	Environmental Protection
<b>Please list the Agency or Agencies affiliated with this regulation::</b>	Executive Office of Energy and Environmental Affairs and all agencies under them.
<b>Describe the regulatory issue or observation::</b>	Massachusetts devotes less than 1% of our budget to our environmental programs - including energy, which is only in part environmental. We need to strengthen our environmental regulations to protect public health and the beautiful place we live. Environmental programs/agencies should receive 2% of the budget, more if we are including energy under environment. The DEP should be given a budget to set interim goals for the Global Warming Solutions Act and write strict regulations to ensure we meet those goals. Already our efforts on this front have led to huge job growth in the Clean Energy sector as well as saved consumers money. This is an example of one of the things Massachusetts has done really well. Let's continue our leadership.
<b>Suggestions for easing regulatory compliance::</b>	<p>Suggestion for strengthening regulatory compliance. Right now the Department of Environmental Protection is woefully under funded and under staffed, so violators are getting away with polluting our environment and degrading our quality of life. We need to fully fund our DEP.</p> <p>Our regulations are in place to protect the people. We hope our government will continue with that rather than only protecting big monied interests.</p>

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**From:** [REDACTED] <reply+536ebc1a6e230b7f@formstack.com>  
**Sent:** Wednesday, July 15, 2015 12:41 PM  
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**Subject:** A Clearer Code: Regulatory Reform  
**Categories:** Red Category

## Formstack Submission for form A Clearer Code: Regulatory Reform

Submitted at 07/15/15 12:41 PM

<b>Name (optional)::</b>	Kathleen Doyle
<b>Company/Organization (if applicable) (optional)::</b>	FireFlower Alternative Energy
<b>Address (optional)::</b>	[REDACTED]
<b>Primary Phone (optional)::</b>	[REDACTED]
<b>Email (optional)::</b>	[REDACTED]
<b>CMR Number (If known): :</b>	
<b>General Regulatory Themes::</b>	Doing Business in MA
<b>Please list the Agency or Agencies affiliated with this regulation::</b>	DPU, DOER, Dept. of Energy and Environment
<b>Describe the regulatory issue or observation::</b>	Net Metering Caps for solar/Distributed Generators
<b>Suggestions for easing regulatory compliance::</b>	Eliminate the net metering caps - they constrain solar investment and development. If I or any of my clients invests \$3M to produce clean, renewable power here in MA, we should have the ability to receive fair compensation for that investment. Net metering caps are not an incentive, they merely give me the ability to develop solar where it is most efficient and to sell the power at market rates to companies who want renewable energy.

I am a local commercial solar developer and entrepreneur with 5 projects in MA which are at risk because of Net Metering Caps. Net metering caps have prevented local developers from building projects (with local labor) that will produce clean, renewable power and have instead supported the delivery of fossil fuel-generated power to business who want a more sustainable option. Eliminate the Net Metering Caps as soon as possible. Please.