



*Town of Pepperell*  
**Conservation Commission**

Town Hall, One Main Street  
Pepperell, Massachusetts 01463  
(978) 433-0325

[www.town.pepperell.ma.us/conservation](http://www.town.pepperell.ma.us/conservation)

8 October 2015

Rachel Madden, Undersecretary  
Executive Office of Administration & Finance  
State House, Room 373  
Boston, MA 02133

Dear Secretary Madden:

Thank you for reaching out to environmental stakeholders for input on the various regulations being reviewed under Governor Baker's Executive Order 562. We appreciate the opportunity to comment as well as the invitation to attend listening sessions regarding this Order.

Since 1972, the Massachusetts Wetlands Protection Act (WPA) Chapter 131, Section 40, has been protecting our valuable wetland resource areas. These regulations have endured many reviews by state agencies, municipalities, and interested parties. In fact, after a three year review and comment period, MassDEP recently promulgated new wetlands and waterways regulations. These changes were enacted to save applicants, commissions, and MassDEP time and resources. In addition, more than 100 of the Commonwealth's municipalities have enacted wetlands protection bylaws. Under home rule authority, municipalities may enact local wetland protection bylaws that provide additional protection to wetland resource areas. These regulations and the efforts by local Conservation Commissions and MassDEP to enforce them are in place to insure the protection of our drinking water, our fisheries, important habitats, and other critical areas as well as provide recreational opportunities.

In 1990, the Massachusetts Endangered Species Act (MESA) under 321 CMR 10.00, was enacted to insure projects that could potentially impact the Commonwealth's rare and endangered species receive the special attention they deserve by requiring project reviews for our most threatened species. We have a responsibility to protect these most critical habitats from destruction or we will continue to see the decline of many species of plants and animals. Our MESA regulations have previously been targeted and further changes that could weaken these regulations could be irreversible to the many species we have an obligation to protect.

With these and other important environmental regulations are in place to protect the Commonwealth's residents, both people and wildlife, we must insure any changes to our regulations, whether state or local, are thoroughly considered to understand their short-

term and long-term impacts. While a review and changes to our Commonwealth's regulations are being proposed, we ask that the Administration take into consideration the efforts that have taken place and continue to take place at DEP, NHESP, and DCR to refine these regulations.

We should not and cannot risk that changes to some of the most critical regulations will be diluted. With current staffing reductions due to early retirement, many of our State agencies are already trying to balance the workload left by early retirees, let alone spread these employees even thinner by asking them to begin review of regulations, many of which have already been reviewed in recent years.

While we understand that ten (10) regulations will be rescinded because they are outdated or related to programs no longer in operation, we look forward to learning more about the remaining eighteen (18) regulations being proposed for amendment and revision.

The Pepperell Conservation Commission looks forward to receiving updated information on the proposed amendments/revisions as new information becomes available. We look forward to a thorough, open, and transparent review of these regulations.

Sincerely,

A handwritten signature in cursive script that reads "Paula Terrasi".

Paula Terrasi, Conservation Administrator on behalf  
of the Pepperell Conservation Commission