

[5] Maintenance is proposed on the crossing over wetlands and White Brook, but the maintenance is not described, that information should be included.

[6] Instead of stating in the NOI, to the left of the hole, or the right of the hole, a better description might be using compass directions, such as east or west. The NOI should strive to be as clear and precise as possible.

[7] How was the Mean Annual High Water Line (MAHWL) determined? In most of this area, it does not appear that the MAHWL is coincidental with top of Bank. It likely is reviewable based on criteria noted in 310 CMR 10.58(2)(a) 2.b.

[8] Has any monitoring been done in the wetlands or Riverfront Area to determine if there are any negative impacts to regulated areas based on the use of chemical applications such as fertilizers or herbicides? The commission reviews work in jurisdiction in order to protect the fisheries and wildlife habitat as well as other interests of the Act. If one reviews the definition of "alter", part of that definition states..."the changing of water temperature, biochemical oxygen demand (BOD), and other physical, biological or chemical characteristics of the receiving water."

[9] The commission should be aware of their ability to require improvements when reviewing buffer zone activities. 310 CMR 10.53(1) states that where a Buffer Zone has already been developed, the Issuing Authority may consider the extent of existing development in its review of subsequent proposed work and, where prior development is extensive, may consider measures such as the restoration of natural vegetation adjacent to a Resource Area to protect the interest of M.G.L. c. 131, § 40.

[10] Has the original Order or any subsequent Orders received a Certificate of Compliance?

[11] The commission should be aware that NHESP information shows a potential vernal pool to the west of hole #3. Did the commission approve the work on hole 3, and likely others, converting a sand trap to a green and vice versa? If this is a routine occurrence, this should be discussed with the commission.

[12] The commission can consider issuing a five-year OOC, as long as it specifies the reason, see General Condition #4. Any extensions however can only be issued for three years.

If you have any questions regarding this letter, please contact: MARK STINSON @ (413)-755-2257

Cc: South Hadley Conservation Commission, TOWN HALL, 116 MAIN STREET, South Hadley, MA, 01075
Representative: Fuss and O'Neill, 1550 Main Street, Suite 400, SPRINGFIELD, MA, 01103