



For a thriving New England

CLF New Hampshire 27 North Main Street  
Concord, NH 03301  
P: 603.225.3060  
F: 603.225.3059  
www.clf.org

March 4, 2019

**Via Hand-Delivery and Email**

Ms. Pamela G. Monroe, Administrator  
New Hampshire Site Evaluation Committee  
21 South Fruit Street, Suite 10  
Concord, NH 03301

RE: Seacoast Reliability Project (Docket No. 2015-04)

Dear Ms. Monroe:

Please find enclosed for filing in the above-referenced matter an original and one (1) copy of Conservation Law Foundation's Motion for Rehearing and Reconsideration.

Copies of this letter and the enclosed Motion for Rehearing and Reconsideration have this day been forwarded via email to all parties on the Distribution List.

Thank you for your attention to this matter.

Sincerely,

Thomas F. Irwin  
V.P. and Director, CLF New Hampshire

cc: Docket No. 2015-04 Distribution List

Encls.

**STATE OF NEW HAMPSHIRE  
SITE EVALUATION COMMITTEE**

Docket No. 2015-04

Application of Public Service Company of New Hampshire  
d/b/a Eversource Energy for a Certificate of Site and Facility for Construction of New  
Transmission Line (Madbury to Portsmouth)

**[PARTIALLY ASSENTED-TO] MOTION OF CONSERVATION LAW FOUNDATION  
FOR REHEARING AND RECONSIDERATION**

Conservation Law Foundation (“CLF”), an intervenor in this proceeding, hereby moves pursuant to RSA 162-H:11, N.H. Code of Admin. Rules Site 202.29, and RSA 541:3 for rehearing or reconsideration of the Site Evaluation Committee’s (“Committee”) January 31, 2019 Decision and Order Granting Application for Certificate of Site and Facility (“Decision”) in the above-captioned docket. In support of its motion, CLF states as follows:

**BRIEF OVERVIEW**

1. This proceeding concerns an application by Eversource (“Applicant”) for a certificate of site and facility to site, construct and operate a new 115kV transmission line from Madbury to Portsmouth (“project”). The project includes a proposal to install three cables across Little Bay using jet plow, hand-jetting, and trenching methods that are anticipated to release approximately 1,500 tons of sediments and a significant nitrogen load. It also includes the proposed installation of concrete mattresses – permanent structures covering up to 8,681 square feet of tidally submerged land in Little Bay that, pursuant to the public trust doctrine, is held in trust by the

state of New Hampshire for the benefit of the public.

2. Little Bay is part of the Great Bay estuary – a highly sensitive natural resource that has been designated an estuary of national significance and that faces numerous ecological challenges, including but not limited to nitrogen pollution, declining water quality, and the loss of eelgrass and oyster habitat. The project threatens to exacerbate these challenges and to undermine significant efforts by municipalities – including major public investments – to restore the estuary’s health.

3. Following a lengthy adjudicatory process in which CLF participated as an intervener, on January 31, 2019, the Committee issued a decision granting Applicant a certificate of site and facility. CLF moves for rehearing and reconsideration of the Decision.

### **STANDARD FOR REHEARING**

4. Decisions of the Committee are reviewable under RSA Ch. 541. *See* RSA 162-H:11. “Any party to [an] action or proceeding before the commission, or any person directly affected thereby, may apply for a rehearing,” RSA 541:3, the purpose of which “is to direct attention to matters said to have been overlooked or mistakenly conceived in the original decision . . . .” *See Dumais v. State of New Hampshire Personnel Comm’n*, 118 N.H. 309, 311 (1978) (internal quotations omitted). Pursuant to RSA 541:4, a motion for rehearing must “set forth fully every ground upon which it is claimed that the decision or order complained of is unlawful or unreasonable.” The Committee may grant rehearing for “good reason.” RSA 541:3.

## ARGUMENT

**I. The Committee's determination that Applicant need not obtain Governor and Executive Council approval is beyond the Committee's authority, is erroneous as a matter of law, and is not supported by the facts.**

5. It is undisputed that Applicant's proposal to install concrete mattresses will involve the use of tidally submerged lands that are subject New Hampshire's public trust doctrine – a doctrine that is rooted in common law and which provides that such lands are held in trust by the state for the benefit of the public. *See Opinion of the Justices (Public Use of Coastal Beaches)*, 139 N.H. 82, 89 (1994). The Decision focuses solely on the interplay between RSA 371:17 and RSA 4:40 to conclude that Applicant need not obtain approval from the Governor and Council. Decision at 71-74.

6. In the first instance, the Committee lacks authority pursuant to RSA Ch. 162-H to adjudicate, and in so doing, grant, property rights. Applicant had a burden to establish unequivocally that it has acquired all necessary rights to proceed with its project. Site 301.03(c)(6). The Decision effectively grants Applicant property rights, ignoring New Hampshire's longstanding public trust doctrine and bypassing the role of the Governor and Executive Council in making public trust determinations. Rather than rendering such a determination, the Committee should have included a condition in the Certificate requiring that Applicant proceed with its project only after its property rights have been clearly established by a court of competent jurisdiction or after seeking and obtaining approval from the Governor and Executive Council.

7. Alternatively, if the Committee had authority to render a decision relative to review and approval by the Governor and Executive, it nonetheless erred as a matter of law in concluding that such review is not necessary. Contrary to its analysis, the Public Utility Commission's review pursuant to RSA 371:17 does not address, and is not exclusive of, New Hampshire's public trust doctrine. There is nothing to suggest that public trust considerations have been delegated to the Public Utilities Commission under RSA 371:17 or that any such consideration by the Public Utilities Commission, if lawfully delegated, operates to the exclusion of the review conducted by the Governor and Executive Council. *See, e.g.*, RSA 482-A:3,II (requiring Governor and Executive Council review of NHDES wetlands permits for major projects in publicly-owned waters with no exception for projects seeking permission from the Public Utilities Commission pursuant to RSA 371:17). Indeed, the Attorney General's office has asserted the position that a pipeline project involving subtidal lands must obtain approval from the Governor and Council *in addition to* permission from the Public Utilities Commission. *See* CLF Exh. 23.

8. In addition to the foregoing, the Committee ignored public trust doctrine considerations based on a technical characterization of concrete mattresses as not involving a permanent use of subtidal lands. To the contrary, Applicant has itself characterized the presence and impacts of concrete mattresses as permanent: it "does not anticipate the need for decommissioning of the Project,"<sup>1</sup> and its application to NHDES for a wetlands permit is replete with descriptions of concrete mattresses in Little Bay as *permanent* impacts. *See* App. Exh. 32 (Joint NHDES/USACE Wetlands Permit Application) at electronic pages 29, 31, 45, 50, 54, 90,

---

<sup>1</sup> *See* Decision at 292. *See also id.* at 216 ("The Applicant does not anticipate decommissioning of the Project unless in the very long term.").

93. *See also* Decision at 185 (“The Applicant acknowledges that concrete mattresses will *permanently* change the substrate from unconsolidated to artificial hard (rock) substrate.”) (emphasis added). The Committee’s characterization of Applicant’s use of subtidal lands for concrete mattresses as something less than permanent is not reasonably supported by the record.

9. For the foregoing reasons, the Decision is unlawful and unreasonable as it pertains to the public trust doctrine and review by the Governor and Executive Council. The Committee should rehear and reconsider this issue and, in so doing, should (1) issue a condition requiring Applicant to obtain all necessary property rights either by seeking review and approval by the Governor and Executive Council or by addressing this question in a court of competent jurisdiction, or (2) deny a certificate of site and facility unless and until Applicant has affirmatively sought and obtained approval by the Governor and Executive Council.

**II. The Committee’s determinations regarding the project’s impacts on the Great Bay estuary and associated resources are erroneous as a matter of law and not reasonably supported by the record.**

10. With the release of approximately 1,500 tons of sediment and a significant nitrogen load, Applicant’s project threatens to harm the health of the Great Bay estuary – a sensitive and critically important natural resource that has been the subject of considerable planning and public investment by numerous communities in the watershed. The Decision – as it pertains to these impacts and to Applicant’s burden to establish that the project will not unduly interfere with orderly development of the region;<sup>2</sup> will not have an unreasonable effect on aesthetics, water quality, the natural environment, and public health and safety;<sup>3</sup> and will serve the public interest<sup>4</sup>

---

<sup>2</sup> RSA 162-H:16, IV(b).

<sup>3</sup> RSA 162-H:16, IV(c).

<sup>4</sup> RSA 162-H:16, IV(e).

– is erroneous as a matter of law and not supported by the record for the following reasons.

**A. The Decision is erroneous as a matter of law and not supported by the record because Applicant’s sediment dispersion model fails to address important variables for assessing the project’s impacts on estuarine resources.**

11. The Decision relies heavily on Applicant’s sediment dispersion analysis to address one of the most environmentally concerning aspects of the project – the release of approximately 1,500 tons of sediment in the highly sensitive and tidally dynamic Great Bay estuary. Applicant’s sediment modeling analysis is flawed in the following ways, greatly undermining its ability to predict the project’s impact on estuarine resources and failing to support the Committee’s Decision.

12. First, the Committee found that Applicant’s own witness, Mr. Swanson, acknowledged that the sediment plume “will travel further south into Little Bay than was estimated by the [sediment dispersion] model.” Decision at 154. This shortcoming in the model poses a risk to Great Bay – which is located immediately south of Little Bay – where the estuary’s most significant eelgrass habitat resides. *See* CLF Exh. 25. Absent a correction to the model to address this admitted flaw, the Decision’s conclusion that sediments will not reach existing eelgrass resources is not supported by the record and should be reconsidered and revised.

13. Second, whereas Applicant’s modeling assumed a seven-hour crossing time for the jet plow operation, the actual crossing time may significantly longer – up to fifteen hours. Day 13 AM at 38-39 (Dacey). Applicant has described the jet plow operation as starting at high slack tide, suggesting that jet plowing will occur only on the outgoing tide, preventing the project’s sediment plume from traveling into Great Bay. However, the longer crossing time – up to fifteen

hours – would be inconsistent with Applicant’s assumption that jet plowing will occur only on the ebb tide and raises significant questions about the Applicant’s mixing zone projection, including the extent and impacts of the sediment plume reaching into Great Bay, including into Great Bay’s eelgrass habitat, on a flood tide.

14. Additionally, the fact that the jet plow crossing time will not be continuous – as a result of the need to stop operations, re-set anchors, and pull the barge – was not part of the Applicant’s model and, like a longer crossing time, undermines the model’s predictions about the plume and mixing zone. Day 13 AM at 40-41 (Dacey).

15. In light of the foregoing, the Decision is unlawful and unreasonable. The Committee should rehear and reconsider this issue and, in so doing, should either deny the certificate on the grounds that Applicant has failed to fully assess the project’s impacts on estuarine resources or require, as part of this review process and before rendering a final decision, that Applicant cure all defects in sediment dispersion model.

**B. The requirement of a jet plow trial run does not properly and adequately address the many concerns associated with the dispersion of sediments in the estuary.**

16. The Decision relies heavily on its requirement of a jet plow trial run to address concerns about the impacts of sediments on water quality and resources in the estuary. *See, e.g.*, Decision at 59-60. The manner in which it requires and relies upon a jet plow trial run is erroneous as a matter of law and not reasonably supported by the record.

17. First, the Decision improperly delegates to NHDES the review of, and jet plow operational modifications warranted by, the trial run and associated data. It provides no opportunity for review by the decisionmaker in this proceeding – the Committee. As discussed

in Part III, below, the condition is an unlawful delegation that is inconsistent with the adjudicatory process established by RSA Ch. 162-H and with the Committee's statutory role as the decision-making authority.

18. Second, whereas the Decision provides that NHDES shall review the results of the trial run and may require operational modifications, it does not properly address the consequences of a scenario in which the trial run reveals significant inconsistencies with Applicant's sediment dispersion model. The Decision states: "The Subcommittee is cognizant of the fact that the results of the jet plow trial run may indicate that modeled predictions were inaccurate, and no adjustments can be made to address the Project's impact." Decision at 59. Despite this important acknowledgment, however, the Decision does not make clear that NHDES is authorized to deny the project's ability to proceed with the jet plow cable installation method.<sup>5</sup> While it includes the condition that "[i]n installation of the submarine cable in Little Bay shall not proceed until authorized by NHDES,"<sup>6</sup> it presupposes that the installation will, in fact, occur. As described above and in Part III, *infra*, the Committee should retain decision-making authority, including the ability to deny a Certificate for a project involving the use of a jet plow based on the results of the trial run. Alternatively, in the event the Committee can lawfully delegate authority to NHDES, it should at least amend the above-quoted condition to add the words "unless and," as follows: "Installation of the submarine cable in Little Bay shall not proceed *unless and* until authorized by NHDES."

---

<sup>5</sup> See, e.g., Decision at 169 ("NHDES is authorized to review the results of the trial and to request that the Applicant *adjust* its jet plowing operations to ensure that the impact on water quality of the Bay [is] minimized.") (emphasis added); *id.* at 170 (noting that the trial run "should provide the opportunity to *adjust the specifications for the jet plow operation* if necessary.") (emphasis added).

<sup>6</sup> Decision at 60.

19. Finally, it is important to note that the jet plow trial run – according to the terms described in the Decision – will not reasonably assure results that are representative of the full jet plow operation. Because the trial run will be limited in distance, and will therefore involve a shorter time duration, it is unlikely to be exposed to the tidal conditions involved in a full crossing of Little Bay. As described above, it could take up to fifteen hours for the jet plow to fully cross the bay, exposing the operation to a variety of tidal conditions. The much shorter trial run will necessarily avoid many of those tidal conditions. In fact, the trial run could potentially be implemented largely during slack-tide conditions, greatly reducing the influence of Little Bay’s significant tides and thereby undermining the trial run’s purpose – to assess the predictive value of the sediment dispersion model.

20. For the foregoing reasons, the Decision is unlawful and unreasonable as it pertains to the jet plow trial run. The Committee should rehear and reconsider this issue and, in so doing, should (1) secure a role for the Committee to review the results of the jet plow trial run as part of this adjudicatory process, (2) retain the right of the Committee to deny use of the jet plow method, and (3) impose conditions on the jet plow trial run to ensure its results are representative of the actual, proposed installation of cables by means of jet plowing.

**C. The Decision does not properly address, and is premised on misapprehensions of fact and law related to, nitrogen pollution.**

21. The project will result in a significant release of nitrogen pollution – the pollutant of greatest ongoing concern to the health of Little Bay and the Great Bay estuary and which has prompted significant planning efforts and municipal investments by communities in the watershed. The Decision is flawed, and fails to properly address this concern, in the following ways.

22. First, the Decision concludes that the project “will not add nitrogen,” stating instead that it will “disturb and dispense nitrogen already present in the Bay.” Decision at 169. This finding is wholly irrelevant for purposes of assessing the impacts of the project as it relates to nitrogen pollution and is premised on a misapprehension of the science as presented by the Town of Durham’s qualified experts. While it is true that the project will cause the release of nitrogen that is already present in the estuary, such nitrogen – so long as it is contained in the sediments and not released into the water column – does not result in adverse impacts to water quality and associated resources like eelgrass. It is the *release of nitrogen into the water column* that is of concern, as it will then become bioavailable and contribute to water quality and eutrophication concerns. Indeed, the Decision’s dismissive treatment of nitrogen as *already present* in the estuary is entirely inconsistent with the manner in which it – and Applicant – have addressed sediments, which, like nitrogen, will not be *added* to the estuary, but which will be disturbed and released into its water column and habitats.

23. Second, the Decision suggests that the jet plow trial run will address concerns related to nitrogen because it “should verify the accuracy of the modeling and should provide the opportunity to adjust the specifications for the jet plow operation if necessary.” Decision at 170. However, with respect to nitrogen, the Committee’s reliance on the jet plow trial run and Applicant’s modeling is misplaced. Specifically, Applicant’s model pertains to the disturbance and dispersion of *sediments*. It is not specifically related to nitrogen and does not address nitrogen contained in pore water – *i.e.*, nitrogen that is already in a dissolved phase, as opposed to pollutants that are adsorbed to sediments. Accordingly, the Committee cannot lawfully and reasonably rely on Applicant’s sediment dispersion model, and the associated jet plow trial run, to address the project’s impacts associated with nitrogen.

24. Finally, the Decision is premised on a misapprehension of both fact and law as it relates to the monitoring of nitrogen and compliance with New Hampshire's surface water quality standards. The Decision states in pertinent part: "The Subcommittee is confident in the ability of NHDES to monitor the amount of nitrogen that will be disturbed in Little Bay and to ensure that the Project will comply with New Hampshire Surface Water Quality Standards." Decision at 170. First, New Hampshire's surface water quality standards contain only *narrative* standards pertaining to nitrogen; they contain no *numeric* standard.<sup>7</sup> As a result, even if NHDES were to monitor total nitrogen releases associated with the jet plow trial run or the installation of cables in Little Bay, it lacks a numeric standard to apply as a benchmark and regulatory tool. Moreover, the Decision's reliance on monitoring nitrogen releases during and after the installation of cables in Little Bay fails to in any way protect the estuary from the project's adverse impacts. The Committee simply should not, and cannot within the context of applicable review criteria, rely on after-the-fact, post-project monitoring of water quality impacts as a means to avoid a full assessment of impacts – *before* they occur – as part of its decision-making process.

25. For the foregoing reasons, the Decision is unlawful and unreasonable as it pertains to the project's impacts caused by the release of nitrogen pollution. The Committee should rehear and reconsider this issue and, in so doing, should deny the certificate on the grounds that the project's nitrogen-related impacts on the estuary are unreasonable and /or have not been adequately assessed by Applicant. Alternatively, it should require further assessment of nitrogen-related impacts as part of this adjudicatory process and before rendering a final

---

<sup>7</sup> See Rules Env-Wq Part 1700, generally; see Rule 1703.14 Env-Wq for narrative water quality standards for nutrients, including nitrogen.

decision.

**D. The record does not support the Committee's Decision as it relates to the project's impacts on eelgrass.**

26. Great Bay, located immediately south of Little Bay, contains the estuary's most extensive eelgrass habitat. *See* CLF Exh. 25. Despite the proximity of eelgrass to the project, the Decision concludes: "The sediment dispersion model demonstrates that sediment associated with the Project will not reach known eelgrass beds." Decision at 207. For the following reasons, this finding is unsupported by the record.

27. First, Applicant provided conflicting information regarding the project's dispersion of sediments into Great Bay, where significant eelgrass habitat is present. On the one hand, according to Applicant: "Water quality modeling demonstrated that neither [the] plume nor deposition of suspended sediments resulting from in-water construction activities will reach any established eelgrass beds." Decision at 186. On the other hand, Applicant's expert (Mr. Swanson) admitted that the sediment plume will travel further south than estimated by the model. Decision at 154. In light of this admitted flaw in the model, Applicant cannot credibly claim, and the Committee could not reasonably conclude, that sediments will not be dispersed into eelgrass habitat in Great Bay.

28. Second, as described above in Part II.A, the sediment dispersion model contains important flaws that preclude an accurate assessment of sediment migration into Great Bay and eelgrass habitat present there.

29. In light of the foregoing, the record does not support the Committee's conclusion that the project will not adversely affect eelgrass habitat, rendering the Decision unlawful and

unreasonable. The Committee should rehear and reconsider this issue and, in so doing, should, as part of this adjudicatory process and before rendering a final decision, require further study and analysis of the project's potential impacts on eelgrass, particularly in light of Applicant's deficient sediment dispersion model.

**E. The Decision fails to properly address the project's impacts on oysters and public health.**

30. The Town of Durham's expert, Dr. Stephen Jones, raised significant environmental and public health concerns associated with the project's disturbance and release of bacteria, viruses and pathogens and the impacts thereof on oysters and people who consume oysters. *See* CLF's Post-Hearing Memorandum at 4-6. Dr. Jones also testified to changes in the location of commercial oyster operations in the estuary – changes that have resulted in oyster harvesting and aquaculture operations moving in close proximity to the project's proposed crossing of Little Bay. *Id.* at 6. The Decision fails in any way to address these important changes, which could expose more oysters, and the people who consume them, to pathogens and other contaminants.

31. As set forth in Part III, *infra*, the Decision also is flawed in that it improperly deferred and delegated to NHDES the concerns described by Dr. Jones to NHDES, stating that "NHDES decided not to require the Applicant to test oysters for pathogens"<sup>8</sup> as if to suggest that NHDES fully assessed the problem of pathogens and that, whatever its assessment may have been, NHDES's assessment of the issue could not or should not be scrutinized by the Committee.

32. For the foregoing reasons, the Decision is unlawful and unreasonable as it pertains to the project's release of pathogens from sediments, and the impacts thereof on oysters and public

---

<sup>8</sup> Decision at 208.

health. The Committee should rehear and reconsider this issue and, in so doing, should independently scrutinize this issue, taking into account the opening of shellfish harvesting areas in proximity to the project, and deny a certificate on the grounds that the project involves unreasonable impacts associated with pathogens, oysters and public health.

**F. The Decision is erroneous as a matter of law and not reasonably supported by the record because it fails to address the project’s impacts on the Great Bay estuary as part of its “orderly development of the region” analysis.**

33. The project involves several risks to the estuary which, as described above, have not been properly addressed by Applicant or in the Decision, and which threaten to undermine significant planning efforts and public investments by numerous communities in the estuary’s watershed. *See* Decision at 310 (“The Strafford Regional Planning Commission acknowledges the importance of [the] Great Bay Estuary and indicates that physical/human activities, such as dredging, are stressors that may have a negative impact on the key habitat due to suspended sediments.”); CLF’s Post-Hearing Memorandum at 21-23. The Decision is erroneous as a matter of law and not supported by the record because it fails to consider in any way the issues of water quality, habitat health, and municipal investments to improve the health of the estuary – investments that could be undermined by the project – as part of the “orderly development of the region” criterion required by RSA 162-H:16, IV(b). Decision at 311-313.

34. For the foregoing reasons, the Decision is unlawful and unreasonable as it relates to the project’s impacts on the orderly development of the region. The Committee should rehear and reconsider this issue and, in so doing, should deny a certificate on the grounds that the project will unreasonably interfere with the orderly development of the region.

### **III. The Decision unlawfully and unreasonably delegates important decision-making and the development of further analyses to NHDES.**

35. RSA Ch. 162-H makes clear that the Committee is the decision-maker in proceedings related to Certificates of Site and Facility, that such proceedings are adjudicatory in nature, and that a core purpose of the Committee's governing statute is to provide "*full and timely* consideration of environmental consequences." RSA 162-H:1 (emphasis added); RSA 162-H:4. Contrary to these requirements, the Decision relies heavily upon future analyses and decisions to be conducted by, and delegated to, NHDES, depriving the Committee and parties to this proceeding "full and timely" information pertaining to the project's impacts on the Great Bay estuary. Examples of this improper delegation of future analyses include the Decision's (1) reliance on NHDES to review the results of the jet plow trial run and to determine what, if any, modifications to jet plow operations are necessary; (2) reliance on NHDES to monitor water quality issues, such as related to nitrogen, after the fact (*i.e.*, during project construction); (3) dismissive treatment of, and failure to independently consider, concerns related to pathogens, oysters, and public health on the theory that NHDES did not to consider them and that, therefore, the Committee need not address them; and (4) "delegat[ion] to NHDES the authority to determine whether updated surveys for rare, threatened, and endangered species shall be completed prior to construction of the Project." Decision at 209. Individually and collectively, these delegations of authority and future analyses to NHDES are contrary to the governing statute, preclude critical information from being made available to the Committee and parties as part of the decision-making process.

36. For the foregoing reasons, the Decision is unlawful and unreasonable. The Committee should rehear this issue and reconsider the manner in which it has, and continues to,

rely on NHDES. In doing so, the Committee should refrain from delegating decision-making authority from NHDES and require further information to be developed by NHDES to be provided to the Committee, as part of this adjudicatory process, for its review prior to a final decision.

### **CONCLUSION**

37. For the foregoing reasons, the Decision is erroneous as a matter of law and not supported by the record. Accordingly, CLF respectfully requests that the Committee grant this motion for rehearing and reconsider its Decision.

38. The following parties concur in the relief requested herein:

The following parties object to the relief requested herein:

Respectfully submitted,

CONSERVATION LAW FOUNDATION

BY: \_\_\_\_\_



Thomas F. Irwin, Esq.  
V.P. and CLF New Hampshire Director  
Conservation Law Foundation  
27 N. Main Street  
Concord, NH 03301  
(603) 225-3060 x3013  
Fax (603) 225-3059  
[tirwin@clf.org](mailto:tirwin@clf.org)

Date: March 4, 2019

**CERTIFICATE OF SERVICE**

I hereby certify that a copy of the foregoing motion has on this 4th day of March 2019 been sent by email to the service list in Docket No. 2015-04.

A handwritten signature in blue ink that reads "Thomas F. Irwin". The signature is written in a cursive style with a large initial 'T' and 'I'.

---

Thomas F. Irwin, Esq.  
Conservation Law Foundation