

STATE OF VERMONT  
ENVIRONMENTAL COURT

Rivers Development, LLC	}	
(Rivers' Appeal of Municipal Denial)	}	Docket No. 7-1-05 Vtec
(Rivers' Appeal of Act 250 Denial)	}	Docket No. 68-3-07 Vtec

**NEIGHBORS' REPLY TO ANR'S PROPOSED  
FINDINGS OF FACT  
AND CONCLUSIONS OF LAW**

NOW COME Thomas Allen, Robert Dansker, Jack Byrne, Virginia Farley, Doug Hall, Cindy Hall, June Holden Life Estate, Rick Hungerford, Rita LaRocca, Robert McMullin, Beverly McMullin, John Porter, Sandy Porter, Scott Sainsbury, Patricia Sainsbury, Benjamin Sanders, Denise Sanders, Karen Sharpwolf, Ruth van Heuven, Marten van Heuven, Wichard van Heuven, and Constance van Heuven, by and through their attorneys, David L. Grayck, Esq. and Zachary K. Griefen, Esq., and Arthur Hendrickson, Pro Se, and Linda Hendrickson, Pro Se, collectively the "Neighbors," and they hereby file this reply to the Agency of Natural Resource's Proposed Findings of Fact and Conclusions of Law in the above-captioned dockets.

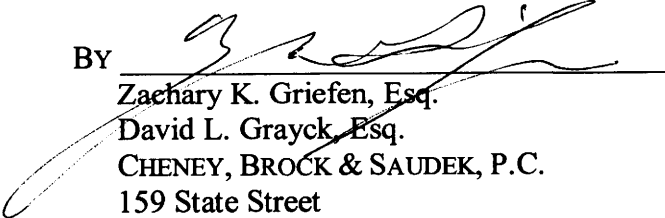
The Neighbors reply to ANR's proposed findings and conclusions only insofar as ANR is asserting that the multi-sector general permit is sufficient to cover all discharges from the proposed quarry, whether subsurface or otherwise and whether or not those discharges are composed entirely of stormwater. In support of the Neighbors' position that the multi-sector general permit does not and cannot cover all discharges from the proposed quarry, the Neighbors restate and incorporate here by reference the facts and arguments raised in their January 9, 2009 Preliminary Response to Rivers' Motion to

Dismiss the direct discharge appeal. The Neighbors further restate and incorporate here by reference their previously-filed Proposed Findings of Fact and Conclusions of Law in the above-captioned dockets and their Reply to Rivers' Proposed Findings of Fact and Conclusions of Law filed under the same cover as this Reply.

DATED at Montpelier this 27th day of April, 2009.

THOMAS ALLEN, ROBERT DANSKER, JACK BYRNE, VIRGINIA FARLEY, DOUG HALL, CINDY HALL, JUNE HOLDEN LIFE ESTATE, RICK HUNGERFORD, RITA LARocca, ROBERT MCMULLIN, BEVERLY MCMULLIN, JOHN PORTER, SANDY PORTER, SCOTT SAINSBURY, PATRICIA SAINSBURY, BENJAMIN SANDERS, DENISE SANDERS, KAREN SHARPWOLF, RUTH VAN HEUVEN, MARTEN VAN HEUVEN, WICHARD VAN HEUVEN, AND CONSTANCE VAN HEUVEN

BY

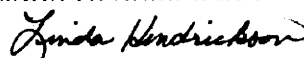
  
Zachary K. Griefen, Esq.  
David L. Grayck, Esq.  
CHENEY, BROCK & SAUDEK, P.C.  
159 State Street  
Montpelier, VT 05602  
(802) 223-4000  
[zgriefen@cbs-law.com](mailto:zgriefen@cbs-law.com)  
[dgrayck@cbs-law.com](mailto:dgrayck@cbs-law.com)

ARTHUR HENDRICKSON



Arthur Hendrickson  
495 Old Route 100  
Moretown, VT 05660  
(802) 223-7761

LINDA HENDRICKSON



Linda Hendrickson  
495 Old Route 100  
Moretown, VT 05660  
(802) 828-0449