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RAYMOND W. ZENKERT, JR., OF COUNSEL ***
*** ALSO ADMITTED IN OHIO & MICHIGAN
BRIAN L. BLACKBURN (Dec.)

May 1, 2023

NOTICE OF APPEAL OF DECISION OF BUILDING COMMISSIONER

RE: **Subject Property:** 190 Hubbard Ave., Dalton, MA
Owner/Applicant: Mr. Raymond Robert
Zoning Relief Being Sought: Appeal, pursuant to Dalton Zoning Bylaw 350-118 (A) and M.G.L. 40A § 8, seeking relief from the Building Commissioner's order, set forth in letter dated April 3, 2023, to remove storage of materials in buffer zone.
Complaining party: Greg Schnopp

I. Introduction and Appeal of Building Commissioner's Decision

I represent Mr. Raymond Robert, the owner of 190 Hubbard Ave., Dalton, MA (the "subject property") with reference to the letter of Brian Duval, the Dalton Building Commissioner, wherein my client was ordered to abate the storage of materials located just inside my client's side of the buffering wall located within the buffer zone on the subject property (the "subject area"). A copy of Mr. Duval's letter of April 3, 2023, is attached hereto as **Exhibit A**. Pursuant to Dalton Zoning Bylaw 350-118 (A) and M.G.L. 40A § 8, I respectfully request that you overrule Mr. Duval's order to remove the stored materials, an order that Mr. Duval apparently felt obliged to make (see below). Dalton Zoning Bylaw 350-118 (A) provides in pertinent part:

> Appeals. The Board is authorized to hear and decide an appeal, as provided in MGL c. 40A, § 8, taken by any person aggrieved by reason of his (her) inability to obtain a permit or enforcement action from any administrative officer under the provisions of Chapter 40A (MGL) by the Berkshire County Regional Planning Commission, or by any person including an officer or board of the Town or of an abutting town, aggrieved by an order or decision of the

> Inspector of Buildings, or other administrative official, in violation of any provision of Chapter 40A (MGL) of this bylaw…

M.G.L. 40A § 8 provides:

> An appeal to the permit granting authority as the zoning ordinance or by-law may provide, may be taken by any person aggrieved by reason of his inability to obtain a permit or enforcement action from any administrative officer under the provisions of this chapter, by the regional planning agency in whose area the city or town is situated, or by any person including an officer or board of the city or town, or of an abutting city or town aggrieved by an order or decision of the inspector of buildings, or other administrative official, in violation of any provision of this chapter or any ordinance or by-law adopted thereunder.

These provisions authorize an appeal of the Building Commissioner's decision to this Board.

This Board should rule against the zoning enforcement referenced in the letter because the alleged violation is insubstantial and is at most a *de minimis* zoning violation. This Board in its discretion can and should find that my client's activities do not warrant the enforcement remedy set forth in Mr. Duval's letter where: (a) the area of the buffer zone being used in the alleged violation is minuscule; (b) the complaining party (see below), resides at least a quarter of a mile away from the subject area, is not aggrieved *in any possible way* from the activities complained of; and (c) the proposed zoning enforcement remedy may be slightly *more* detrimental to my client's neighbors to the south who are actually living near the subject area.

In light of the fact that Mr. Duval and *this Board* have known *for years* that my client has been using the subject area for the storage of materials, I made a formal public records request pursuant to M.G.L, 66, §10, Chapter 4, § 7, Clause 26, and the regulations at 950 C.M.R. 32.00 to Mr. Duval, seeking any documentation which brought about his current letter. A copy of the documents I received in response are attached hereto as **Exhibit B.** From the records received, it is clear that an email and a photograph from Mr. Gregory Schnopp is what prompted Mr. Duval's current letter.

II. Pertinent Facts

My client owns the property known as 190 Hubbard Ave. (the "subject property"). The subject property is located on the east side of Hubbard Avenue and is zoned industrial. My client operates an Asphalt, Brick, and Concrete ("ABC") recycling operation on his property and is licensed by the Massachusetts Department of Environmental Protection ("DEP"). Abutting my client's property on the south are residential homes located on subdivision lots. Directly abutting my client's property to the east is property designated as 899 South Street. This is a large property owned by the Schnopp Family Nominee Trust (the "Schnopp Trust") and Mr. Gregory Schnopp is the trustee. The Schnopp Trust property is a split zoning lot, with the western portion being zoned industrial and the eastern portion being zoned residential. The Schnopp Trust property almost entirely surrounds the property known as 831 South Street. The 831 South Street property is a residentially zoned property which contains a single-family home and is owned by Gregory Schnopp and his wife Catherine Schnopp. A copy of the detail of the Dalton zoning map depicting these properties is attached hereto as **Exhibit C**.

The Dalton Zoning bylaw calls for a 50-foot buffer strip between residential and industrial property. Some number of years ago my client unintentionally put a buffer wall in the buffer strip at the far southern end of his property, where his property abuts residential property. Please understand, although my client was aware of the 50-foot buffer, he did not intend to build inside the 50-foot area. The principal borderline in that area is a curve and he undertook the construction without having it surveyed. Placing the wall where it is was done by mistake.

Unfortunately, there is some area of the buffer zone located *on my client's side* of the buffer wall that is itself within the buffer zone. This area is approximately 4 feet in depth in some areas and at its most, it is approximately 12 feet in depth. As we told this Board in 2020 (see below), my client stores materials up against the buffer wall. He loads materials by pushing them against the buffer wall with the

bucket loader and then takes the bucket of materials away for utilization. In 2020, it was estimated that about 3% of the buffer zone on my client's side of the buffer wall was being used for material storage of (the "subject area"); the client believes this may be a slight overestimate of the area.

In 2020, Mr. Duval issued an order requiring my client to move the buffer wall out of the buffer zone. This order may also have been initiated from a complaint from the Schnopp family. I appealed that order to this Board. At the hearing on my appeal, and more specifically in my written memorandum, we *clearly* stated that my client was using the subject area for the storage of materials. At the hearing in 2021, one of the neighbors who lived on a residential subdivision lot just south of the buffer wall specifically said that the buffer wall was effective at keeping out the noise and dust from my client's operations. Based upon the provisions of the Dalton Zoning bylaw I referenced in my memorandum, this Board found that the construction of the wall in the buffer zone did not violate the bylaws. A copy of your 2020 decision is attached hereto as **Exhibit D**. Also attached as **Exhibit E** is the sketch utilized by my client in 2020 which highlights in yellow the approximate location of the subject area and where the buffer wall was partially located in the buffer zone. While the *decision* does not specifically reference my client's use of the subject area it should have been clear to everyone that my client was using the subject area for storage of materials at that point. Indeed, he had been using it for some time before 2020.

Mr. Schnopp has just now complained to Mr. Duval about my client's use of this small portion of the buffer zone for storage of materials. Mr. Schnopp knew about this issue years ago, but he has only now decided to request that Dalton officials order my client to cease using the area for storage. The Board should be aware that there is a current Land Court civil action, 22 MISC 000392 (DRR), where the Schnopp Trust is suing my client claiming he has trespassed into their 899 South St. property. My client has vehemently denied the trespass. I am defending him in that civil action, and there may be some animosity between the parties based upon the ongoing litigation.

The Board should be aware that Mr. Schnopp's home is located between one quarter and one third of a mile away from the subject area he is complaining about. From Mr. Schnopp's home, the noise and dust at the subject property would be essentially impossible to detect. The work requested to be done on the subject area would have no effect on traffic in the area or the property value of Mr. Schnopp's home. Indeed, if the Board were to impose the burdensome zoning enforcement he is looking for, he would most likely be unable to discern the difference of the effect on his property from his home.

Please understand that if this Board orders my client to cease using the subject area for storage of materials, compliance with that order would be extremely burdensome and expensive for my client. Compliance with the order could come about through two feasible options:

1. My client could move the buffer wall north or greatly increase the width of the buffer wall such that all of the area on his side of the buffer wall would be outside of the buffer zone. This could only be done at an enormous expense to my client and this would be extremely time-consuming.
2. My client could also move all of the materials such that the materials and the bucket loader gathering the materials would no longer be located in the subject area. The major problem with this option is that this would require the materials to be located a significant distance away from the buffer wall. This would diminish the wall's ability to lessen the noise and the dust emanating into the subdivision lots to the south. Also, if my client had to gather the materials with the bucket loader from freestanding piles of material, this would require significantly more time and costly diesel fuel using the bucket loader to gather ("chase") materials as it is much easier to load the materials when they are up against the buffer wall. In other words, by locating the materials away from the wall there would be an incremental increase in the noise and dust going to the residential homes on the subdivision lots to the

south. Also, please realize because Mr. Schnopp's home is so far away he would not notice any additional noise or dust.

III. *De minimis* Zoning Violation and Equitable Discretion

My client's use of a very tiny portion of the buffer zone located just inside the buffer wall to store materials is a *de minimis* zoning violation that does not require zoning enforcement. "De minimis" is shortened from the Latin "*de minimis non curat lex*" which means "the law cares not for small things." The Webster's unabridged dictionary, the dictionary referenced in the Dalton zoning Bylaws, defines "*de minimis*" as "lacking significance or importance: *so minor as to merit disregard*" (*emphasis* added). In other words, in the law there are sometimes factual situations where a claimant can prove a technical minor violation but the tribunal, in its discretion, finds the violation to be so inconsequential as it does not deserve enforcement intervention.

The *de minimis* concept holds true with zoning violations. Certain zoning violations can be of such a technical nature, with little or no harm or damage to others, such that while technically a violation, a board could find in its equitable discretion that the particular violation would not warrant zoning enforcement. Courts in Massachusetts have referenced *de minimis* zoning violations. See *Martinonis v. Movalli*, 2007 WL 3025045 (Massachusetts Land Court, 2007) ("the shed had been built without the benefit of a building permit, which the Board determined was required, although it termed this a 'de minimis violation'." *Martinonis* at Pge 1) and *Bernstein v. Planning Bd. of Stockbridge*, 76 Mass.App.Ct. 759, 770 (2010) ("In reaching his decision, the judge dismissed the exempted activities noted, *supra,* as being of no specific value to a landowner because they either already are allowed under the zoning Act, G.L. c. 40A, § 3, or are de minimis in nature." *Bernstein* at 770.)

Aside from utilizing the concept of *de minimis* violations, this Board has equitable discretion powers with reference to zoning violations, especially extremely minimal zoning violations which do

not harm any party. The Board can choose to be reasonable and not to mandate zoning enforcement for every technical violation. See *Van Arsdale v. Town of Provincetown*, 344 Mass. 146 (1962) (setback violation relating to two feet of balcony was "too trivial to notice"); *Priore v. Sawyer*, 30 Mass. App. Ct. 943 (1991) (rescript) (possible one or two-inch violation of side setback requirement was too trivial to notice). Even more importantly, this Board can take into account whether the complaining party bringing the enforcement action has shown any real and substantial injury from the alleged violations. See *Van Arsdale v. Town of Provincetown*, 344 Mass. 146 (1962); *Priore v. Sawyer*, 30 Mass. App. Ct. 943 (1991) (rescript). The board can exercise its equitable discretion in this case to not take zoning enforcement because Mr. Schnopp has not been injured and the alleged violations are insignificant.

This Board can clearly find my client's use of the subject area for storage is *de minimis* and/or the Board can exercise its equitable discretion to find zoning enforcement is not warranted in this particular case. I submit that the Board can consider three factors when making this determination: (1) The subject area is but a tiny portion of the buffer zone, approximately 3%, while the proposed zoning enforcement would be extremely burdensome to my client; (2) The use does absolutely no harm to any neighbors, but it is possible the zoning enforcement could slightly increase the detriment to the neighbors to the south; (3) This proposed zoning enforcement does not originate from your Building Commissioner trying to alleviate a particular harm that arises from this particular use. Rather, the complaint comes from a neighbor who suffers absolutely no harm from the use.

There is a Massachusetts Land Court case which is similar to our fact pattern which is persuasive authority to justify this Board not taking zoning enforcement in this particular matter. See *Martinonis v. Movalli*, 2007 WL 3025045 (Massachusetts Land Court, 2007). In the *Martinonis* case the complaining party, Mr. Martinonis, had already been involved with the contentious legal dispute with his neighbor, Eastern Point LLC ("Eastern Point"). Eastern Point owned residential property

across the street from Mr. Martinonis. Mr. Martinonis made complaints to the Gloucester building inspector as to technical zoning violations on the Eastern Point property. The building inspector issued an order and there was then an appeal to the Gloucester Zoning Board of Appeals ("ZBA"). The ZBA made note of the fact that Mr. Martinonis was totally unaffected by any of the alleged violations and that the violations came about unintentionally. The Board found that the violations were so minimal that in their equitable discretion they should take no zoning enforcement, and they specifically said one violation was a *de minimis* zoning violation. Under these circumstances the ZBA refused to make a zoning enforcement order.

Mr. Martinonis appealed to the Land Court. However, the Land Court never addressed the decision of the board directly because Mr. Martinonis had no *standing* to bring an appeal to the Court. A person can only appeal a zoning board's decision to a court if that person is actually aggrieved by the decision. While there is a presumption that abutters have standing, that presumption can be overruled by the facts found in the case. Standing as an "aggrieved" person requires evidence of an injury particular to the plaintiffs, as opposed to the neighborhood in general, and the injury must be causally related to violation of zoning laws, such as provisions pertaining to light, noise, dust, traffic, and, in some senses, property values, and the plaintiffs alleged injury must itself be more than *de minimis*. See *Murchison v. Sherborn Zoning Board of Appeals,* 485 Mass. 209 (2020). Thus, the Gloucester ZBA refused to issue an enforcement order, in part, because Mr. Martinonis suffered no injury from the alleged violations. The Land Court also refused to even hear the case because he suffered no injuries from the alleged violation. If this Board does not order the zoning enforcement requested by Mr. Schnopp, he too should be unable to appeal your decision to court.

As I have said, in light of the fact that Mr. Duval and this Board have known about my client's use of the subject property for years, it would appear that he felt obligated to seek zoning enforcement

against my client because of Mr. Schnopp's email. Yet, this Board should understand that the pertinent statute pertaining to request for zoning enforcement G.L.A. 40A § 7, does not mandate that the zoning enforcement officer is obliged to seek zoning enforcement for every technical violation. The statute provides that if the "officer or board declines to act, he shall notify, in writing, the party requesting such enforcement of any action or refusal to act, and the reasons therefor…". Where zoning enforcement officer declines zoning enforcement he does not have to say that he has found no violation; he merely must give reasons.

In other words, a zoning enforcement officer does have some equitable discretion. In fact, had Mr. Duval not written the letter for zoning enforcement, Mr. Schnopp would not have been able to appeal to this Board because, pursuant to G.L.A. 40A § 8, to bring an appeal to this Board a party must be aggrieved by the zoning enforcement officer's decision. As set forth above, Mr. Schnopp has no injury from the alleged violation and would not been able to appeal a decision of the zoning enforcement officer not to order zoning enforcement. See *Warrington v. Zoning Bd. of Appeals of Rutland*, 78 Mass.App.Ct. 903 (2010).

Finally, this Board should consider that where there is some involvement of the zoning authorities with reference to claimed violation, the board can take that into account when considering zoning enforcement. *See Town of Marblehead v. Deery*, 356 Mass. 532 (1969). In this matter, three years ago this Board found that the location of the buffer wall was legal. At that point in time the zoning enforcement officer and the Board were fully aware that my client was utilizing a small portion of land in the buffer zone just inside the buffer wall (the "subject area"). Yet, the board took no action regarding that matter. In light of the fact that the area itself was *de minimis*, my client could reasonably understand and that he could continue as he has been doing for years and his business operations are keyed into this utilization. While the continued use of the subject area might not be an explicit part of

the 2020 decision, the explicit knowledge of the use in the implicit acquiescence or approval is still something the Board can consider, and when it is considered whether this same Board should order the subject zoning enforcement.

IV. Conclusion

I request that this Board please consider that: (1) Mr. Schnopp is seeking zoning enforcement with reference to an extremely minor violation that does not harm him or anyone else whatsoever; (2) The violations came about through the mistake of my client; they were not intentional; and (3) The enforcement order being sought, if granted, will not change Mr. Schnopp's situation because he is not harmed by the alleged violations, but zoning enforcement would cost my client dearly, and the zoning enforcement may incrementally harm the neighbors to the south. Based upon these facts and based upon the arguments and authorities set forth above, this Board should either find that the alleged violation is a *de minimis* zoning violation not justifying an enforcement order or find that it is a minor violation so that the Board, in its equitable discretion, would not order the zoning enforcement referenced in the letter.

Please understand my client regrets his mistaken placement of the buffer wall. If he were constructing it again, he would place the buffer wall beyond the 50-foot buffer zone. My client apologizes for the mistake and we sincerely request that you do not order the cessation of my client's utilization of the subject area. Such an order would do nothing to reduce the harm to any of the neighbors and it would only enable Mr. Schnopp to use this Board to cause significant harm to my client, with absolutely no benefit to the citizens.

Sincerely,

John M. McLaughlin, Esq.
Green Miles Lipton, LLP

TOWN OF DALTON

Office of the Building Commissioner
462 Main Street
Dalton, Massachusetts 01226
Phone (413) 684-6111 ext. 27 FAX (413) 684-6107

EXHIBIT
A

April 3, 2023

Raymond Robert
510 Kirchner Rd.
Dalton, MA 01226

Subject: 190 Hubbard Ave. – storage within the 50' Buffer zone

Dear Mr. Robert,

This letter is in regards to the property that you own and operate your business from at 190 Hubbard Ave. The town's zoning by-law section 350-28 A (Transition requirements) requires that there be a min. of a 50' buffer created when a business or industrial use abuts a residential district. This buffer must be maintained and suitably landscaped and screened densely as to screen effectively any business or industrial activity from the ground-level view from adjacent residential property.

It has come to the attention of this office that you are storing materials on the inner side of the retaining wall that falls within the 50' buffer setback. To the best of my knowledge the Zoning Board had given the ok for the wall to be located where it was first built, but there was never an approval to use the remaining area for storage of any kind. If there is storage within the 50' setback then it constitutes a violation.

You must abate this violation by either removing the piles of stored materials back to the 50' mark or you may seek a variance from the Dalton Zoning Board of Appeals to use the remaining space as a work area.

If you are aggrieved by my determination you may appeal to the Zoning Board of Appeals as stated in Section 350-118 A. Such appeal must be exercised within 30 days of receipt of this order.

Sincerely,

Brian Duval

Brian Duval
Town of Dalton
Building Commissioner/ Zoning Enforcement Officer
(413) 684-6111 ext. 27

EXHIBIT
B

From: Brian Duval
To: Heather Williams
Subject: Fw: 190 Hubbard Ave
Date: Monday, April 24, 2023 3:25:12 PM
Attachments: 190 Hubbard Ave .pdf

Here is the email that my office received.

Brian Duval

Building Commissioner / Zoning Enforcement Officer

Please note that emails to and from municipal officials are considered public records by the Secretary of State and confidentiality should not be expected.

From: Greg Schnopp <greg@ajschnopp.com>
Sent: Monday, March 20, 2023 6:54 AM
To: Brian Duval <BDuval@dalton-ma.gov>
Cc: Thomas Hutcheson <THutcheson@dalton-ma.gov>
Subject: 190 Hubbard Ave

CAUTION: This email originated from outside your organization. Exercise caution when opening attachments or clicking links, especially from unknown senders.

Hi Brian

Attached is a picture of material stored against the wall that I believe is in the buffer zone

I know sections of the wall was at least 12' inside the buffer Zone

Do we know where the buffer boundary line is so no work, material or machinery is stored in the zone

This area should be in accordance to the bylaw

Can the Buffer Boundary Line be surveyed and delineated as the special permit required

Thank you

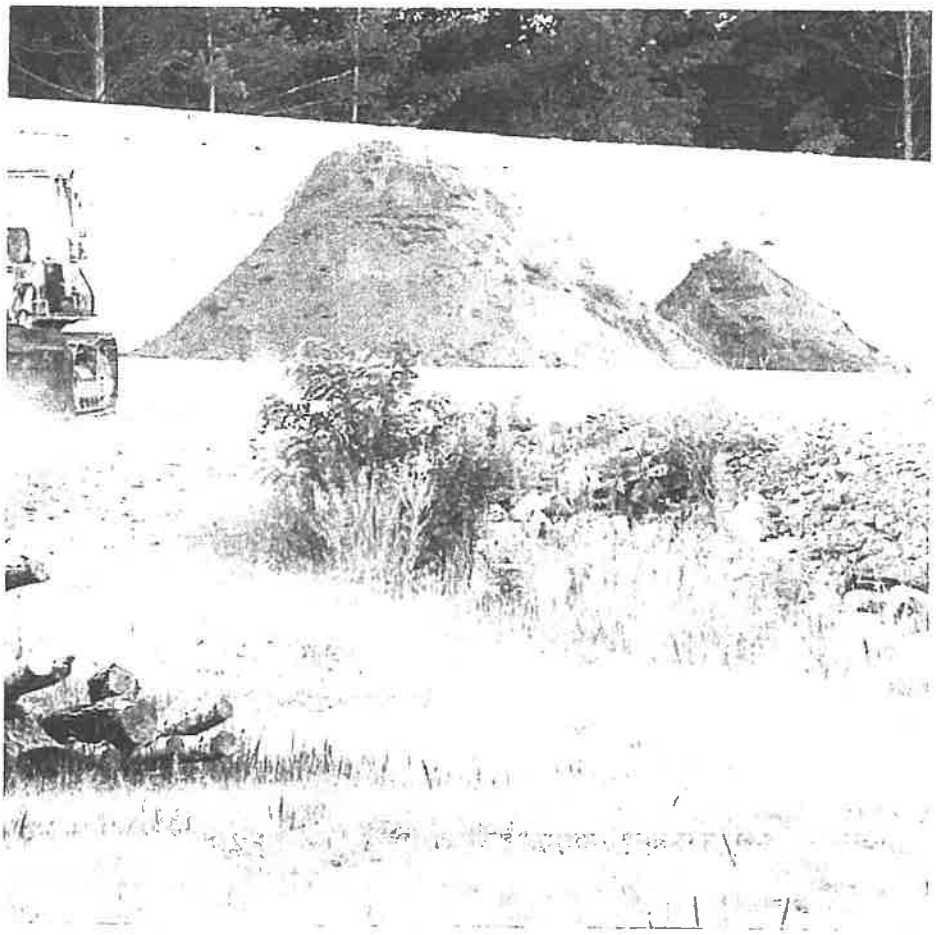
Greg

Town Bylaw 350-106.12C

Landscaping:

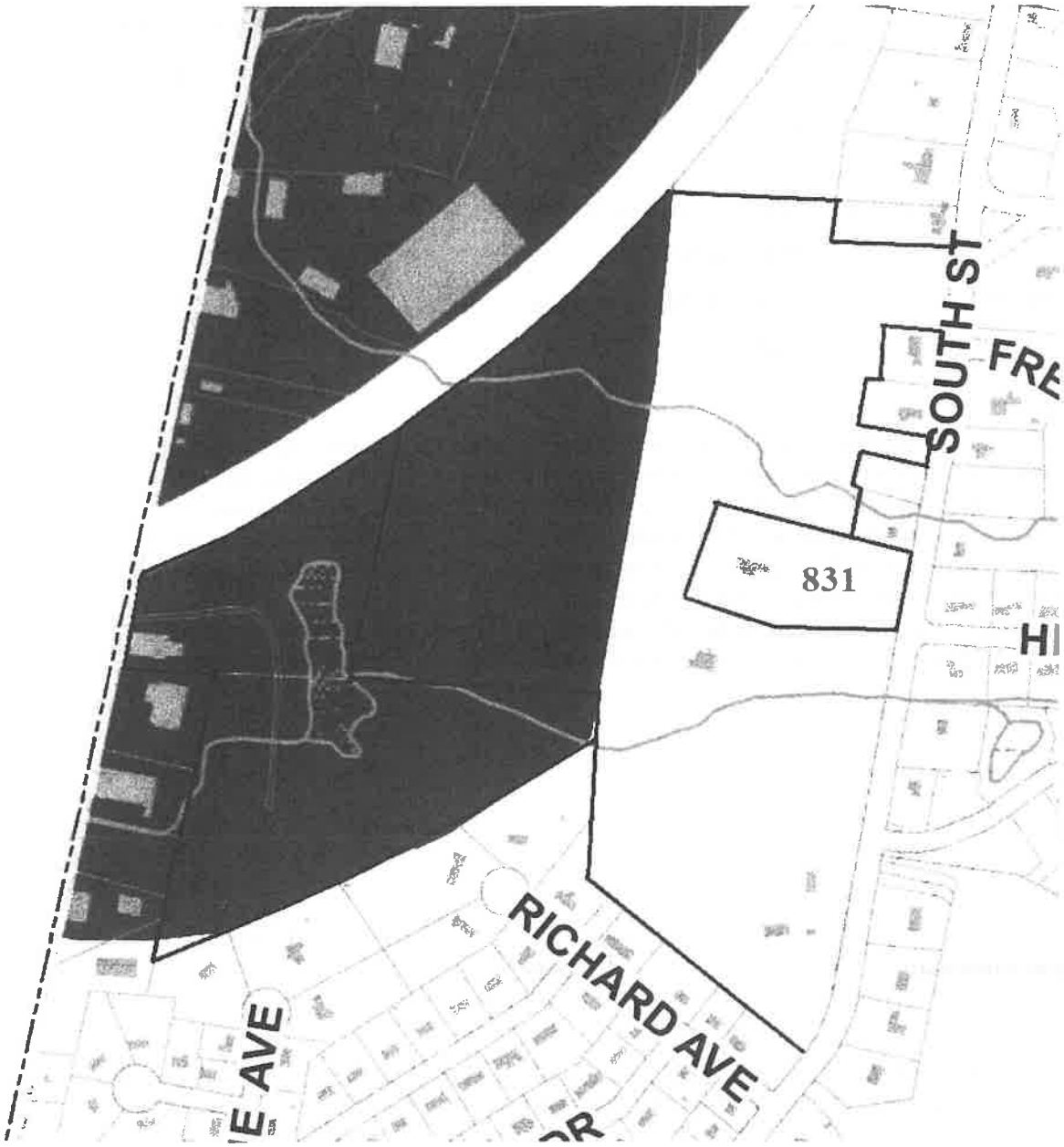
District buffer strip: A continuous natural or landscaped buffer strip of at least 50 feet in width shall be provided and maintained between industrial

districts and any residential districts and/or property lines. The buffer strip shall be of a density to substantially screen the development in question from view, along the zoning district line in question. Plantings of various approved evergreen species are encouraged and shall have a minimum four inches in diameter measured four feet from ground level.



EXHIBIT

C



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Town Hall
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Dalton, Massachusetts 01226

Telephone (413) 684-6111

20 SEP 22 PM 1:02

Fax (413) 684-6107

EXHIBIT
D

DALTON BOARD OF APPEALS

NOTICE OF DECISION

ADMINISTRATIVE APPEAL OF:	JOHN MCLAUGHLIN, ESQ.
OWNER:	RAY ROBERT
PREMISES AFFECTED:	190 HUBBARD AVE., DALTON, MA
PETITION:	#569

Referring to the above petition for an Administrative Appeal of the Dalton Building Commissioner's enforcement of the Town's Zoning Bylaw 350-28 A at 190 Hubbard Ave., Dalton, MA, Assessor map #124, lot #9, zoned PIDD Planned Industrial Development District. Based upon the complete record of proceedings, the Dalton Zoning Board of Appeals finds that so much of the appeal that applies to maintaining a "wall" with in the buffer zone is in compliance with the requirements of the Dalton Zoning bylaws and, upon motion duly made and seconded the Board voted unanimously to allow the request and grant the appeal. The Administrative Appeal was granted at the Deliberations held on September 10, 2020 VIA ZOOM.

Dalton Board of Appeals

Anthony P. Doyle, Chairman

9-21-20
Date

Note: Any appeal from the decision of the SPGA must be made pursuant to Ch. 40A, S17 as amended, and must be filed within twenty (20) days after the filing of the decision with the Town Clerk

EXHIBIT

E

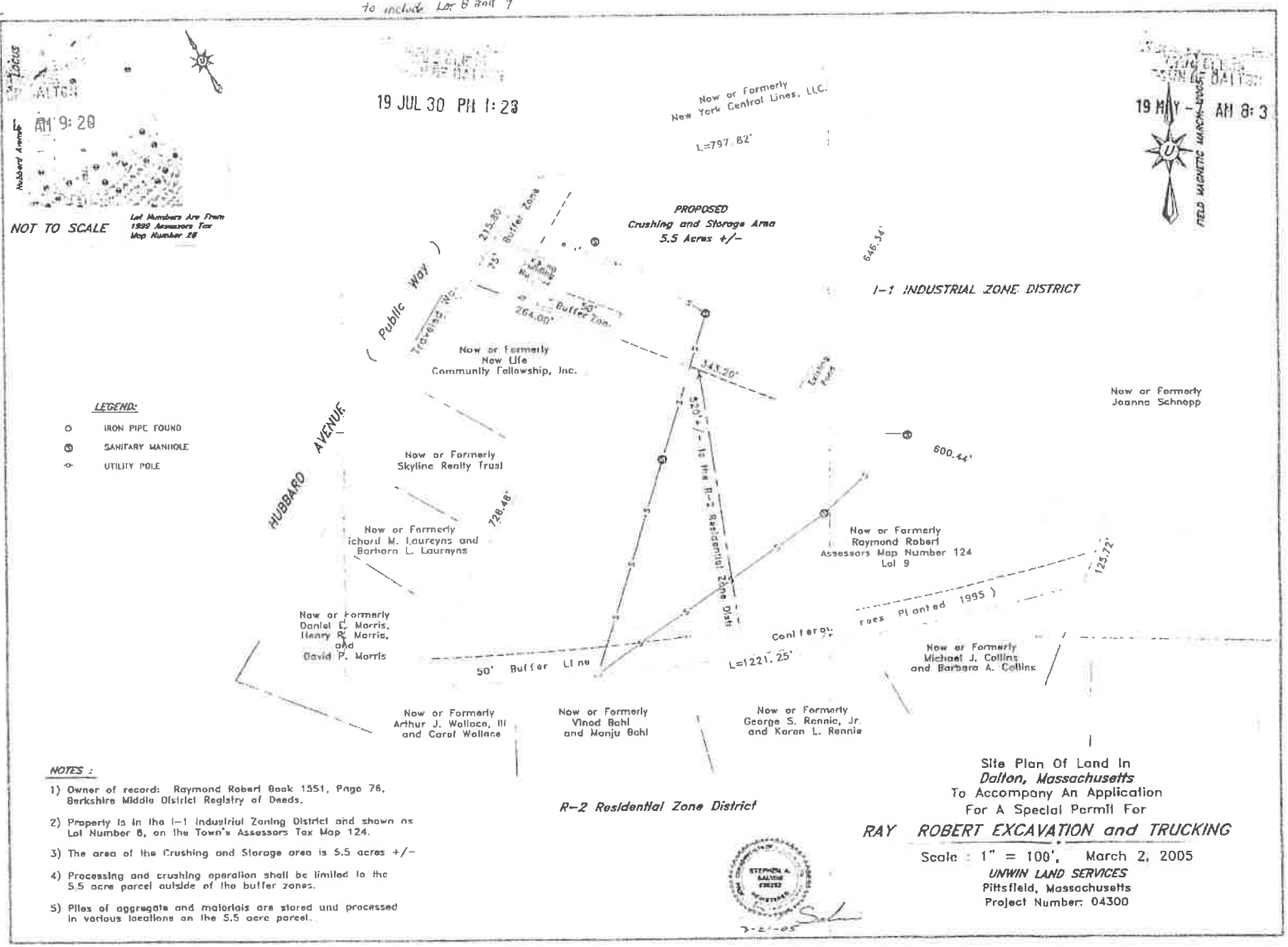
Revised 6/4/19 for hours of operation

Revised 1-30-17 to include Lot 8 and 9

19 JUN [illegible] AM 9:20

19 JUL 30 PM 1:23

19 MAY - AM 8:3



NOTES :

1) Owner of record: Raymond Robert Book 1551, Page 76, Berkshire Middle District Registry of Deeds.

2) Property is in the I-1 Industrial Zoning District and shown as Lot Number 8, on the Town's Assessors Tax Map 124.

3) The area of the Crushing and Storage area is 5.5 acres +/-

4) Processing and crushing operation shall be limited to the 5.5 acre parcel outside of the buffer zones.

5) Piles of aggregate and materials are stored and processed in various locations on the 5.5 acre parcel.

STEPHEN A. SALVINI 27632 REGISTERED LAND SURVEYOR

3-2-05

Site Plan Of Land In
Dalton, Massachusetts
To Accompany An Application
For A Special Permit For
RAY ROBERT EXCAVATION and TRUCKING

Scale : 1" = 100', March 2, 2005

UNWIN LAND SERVICES
Pittsfield, Massachusetts
Project Number: 04300

TOWN OF DALTON

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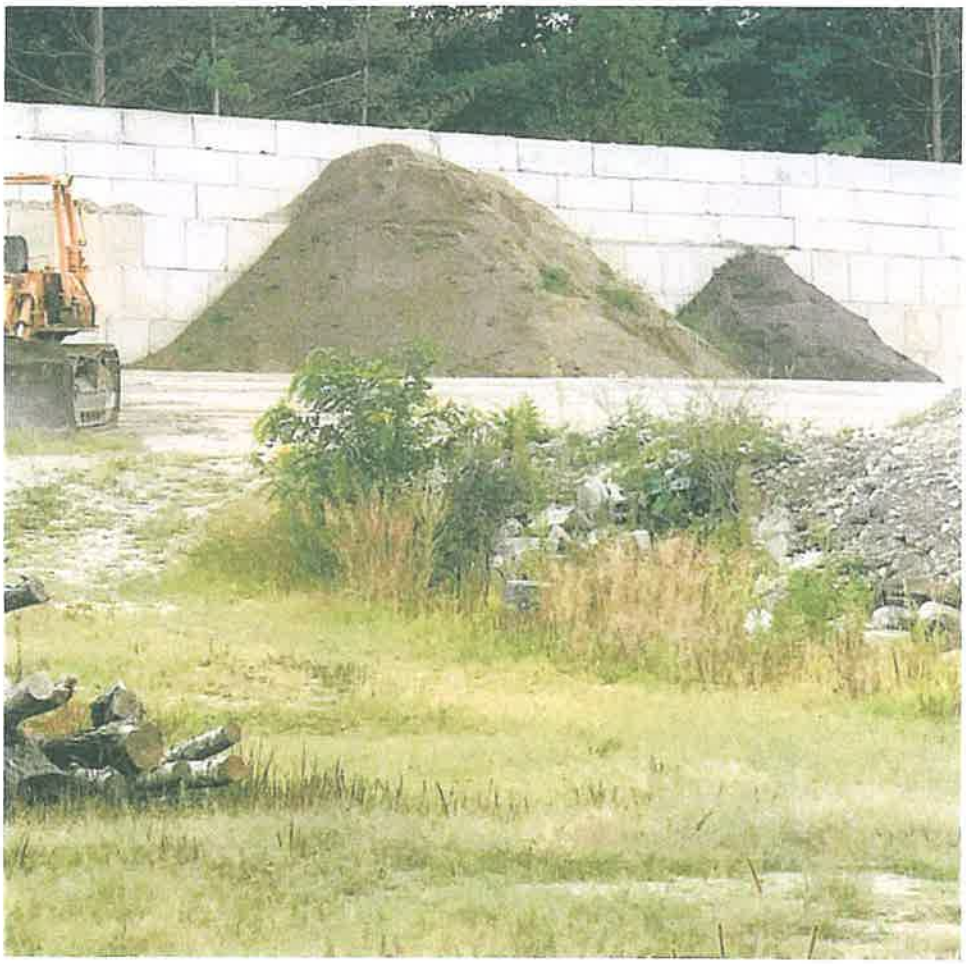

EXHIBIT

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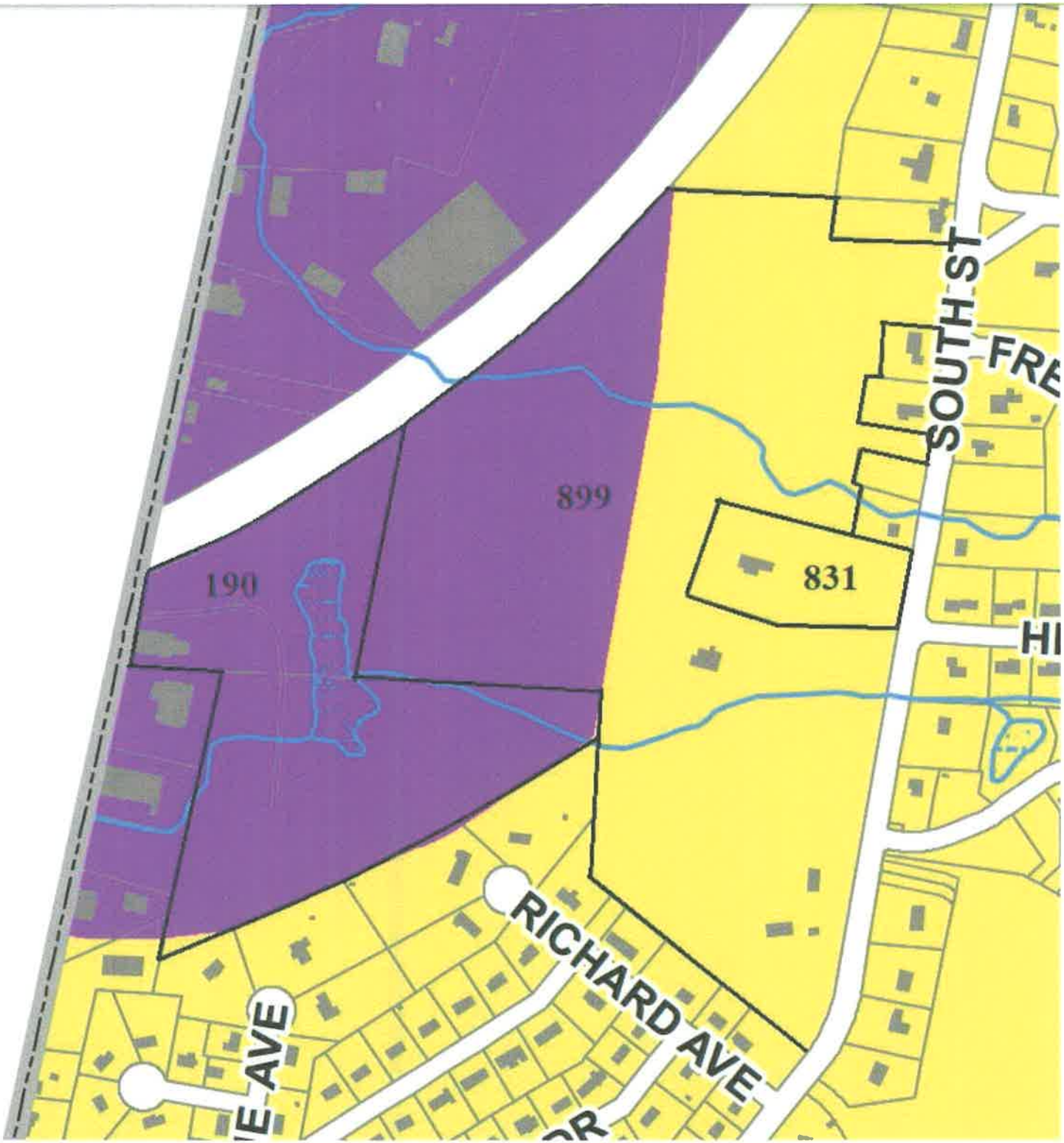

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PREMISES AFFECTED:	190 HUBBARD AVE., DALTON, MA
PETITION:	#569

Referring to the above petition for an Administrative Appeal of the Dalton Building Commissioner's enforcement of the Town's Zoning Bylaw 350-28 A at 190 Hubbard Ave., Dalton, MA, Assessor map #124, lot #9, zoned PIDD Planned Industrial Development District. Based upon the complete record of proceedings, the Dalton Zoning Board of Appeals finds that so much of the appeal that applies to maintaining a "wall" with in the buffer zone is in compliance with the requirements of the Dalton Zoning bylaws and, upon motion duly made and seconded the Board voted unanimously to allow the request and grant the appeal. The Administrative Appeal was granted at the Deliberations held on September 10, 2020 VIA ZOOM.

Dalton Board of Appeals

Anthony P. Doyle, Chairman

9-21-20
Date

Note: Any appeal from the decision of the SPGA must be made pursuant to Ch. 40A, S17 as amended, and must be filed within twenty (20) days after the filing of the decision with the Town Clerk

EXHIBIT

E

Revised 6/4/19 dgn
hours of operation

Revised 1-2017 MB to include Lot 8 and 9

19 JUN - AM 9:20

19 JUL 30 PM 1:23

19 MAY - AM 8:3

LEGEND:

- IRON PIPE FOUND
- SANITARY MANHOLE
- UTILITY POLE

NOTES :

1) Owner of record: Raymond Robert Book 1551, Page 76, Berkshire Middle District Registry of Deeds.
2) Property is in the I-1 industrial Zoning District and shown as Lot Number 8, on the Town's Assessors Tax Map 124.
3) The area of the Crushing and Storage area is 5.5 acres +/-
4) Processing and crushing operation shall be limited to the 5.5 acre parcel outside of the buffer zones.
5) Piles of aggregate and materials are stored and processed in various locations on the 5.5 acre parcel.

STEPHEN A. BALYISE ENGINEER REGISTERED

2-24-05

Site Plan Of Land In
Dalton, Massachusetts
To Accompany An Application
For A Special Permit For
RAY ROBERT EXCAVATION and TRUCKING

Scale : 1" = 100', March 2, 2005

UNWIN LAND SERVICES
Pittsfield, Massachusetts
Project Number: 04300