

# Lake Auburn Watershed Protection Commission

[www.lakeauburnwater.org](http://www.lakeauburnwater.org)

Thursday, April 18, 2024, at 3:00pm – 5:00pm AVCOG, 125 Manley Road, Auburn, ME

## **AGENDA**

1. LAWPC board member seats
  - a. Renewals- Alan and Glen
  - b. Vacancy- Lewiston representative
2. Minutes
  - a. 2/14/2024- Regular Meeting
  - b. 3/13/2024- Special Meeting
3. Consent Agenda
  - a. Financial report
4. Public Comment
5. Water Quality & Watershed Report- Erica
6. Clerk and Staff Reports
  - a. Mike Broadbent – As deemed necessary by Michael Broadbent
  - b. Erica Kidd – As deemed necessary by Erica Kidd
7. Old Business
  - a. Executive Session regarding negotiations of potential land transactions in accordance with 1 M.R.S.A. 405 (6) (C)
  - b. Water quality ad-hoc committee update- Mike
  - c. AWD ordinance authority- Mike
  - d. LAWPC legal representation- board discussion of options
8. New Business
  - a. Memo from Ken Wagner regarding meeting with Auburn Mayor and City staff- Erica
  - b. Update to The Basic Agreement- Mike
9. Other Business
10. Adjournment

### FUTURE REGULAR MEETING SCHEDULE:

June 12

September 11

November 13

December 4 (as needed)

# Lake Auburn Watershed Protection Commission

## Regular Meeting

**Wednesday, February 14, 2024**

**Location:** Androscoggin Valley Council of Governments (AVCOG), Auburn, Maine

**Time:** Meeting began at 3:00 PM

**Recording:** The meeting was video recorded. A link to the video is on the Commission website.

**Commissioners Present:** Alan Holbrook, Amy Landry, Heather Hunter, Brad Kowalski, Dan Bilodeau, Glen Holmes and Camille Parrish

**Commissioners Absent:** David Chittim, Kevin Gagne

**Others Present:** Michael Broadbent Commission Clerk, Erica Kidd Watershed Manager, Tracy Roy Commission Treasurer.

*Commissioner Landry stepped away from the meeting*

### Agenda Item 1. Election of Officers

After a brief discussion the Commissioners took action on electing officers.

**Vote 1** On a motion by Commissioner Holmes and seconded by Commissioner Hunter to nominate Camille Parrish, Chair of the Commission.

**Passed 5-0-1, Commissioner Parrish abstained.**

**Vote 2** On a motion by Commissioner Bilodeau and seconded by Commissioner Hunter to nominate Amy Landry to the position of Commission Secretary.

**Passed 6-0**

**Vote 3** On a motion by Commissioner Hunter and seconded by Commissioner Holmes to nominate Tracy Roy to the position of Treasurer to the Commission.

**Passed 6-0**

**Vote 4** On a motion by Commissioner Bilodeau and seconded by Commissioner Hunter to nominate Glen Holmes to the position of Vice Chair.

**Passed 5-0-1, Commissioner Holmes abstained.**

## Agenda Item 2. Approve minutes

- a. 11/08/2023 Regular Meeting Minutes

**Vote 5        On a motion by Commissioner Holmes and seconded by Commissioner Hunter to approve the minutes of the November 18, 2023 Regular Commission meeting.**

**Passed 6-0**

- b. 01/10/2024 Special Meeting Minutes.

**Vote 6        On a motion by Commissioner Holmes and seconded by Commissioner Parrish to approve the minutes of the January 10,2024 special meeting.**

**Passed 6-0**

## Agenda Item 3. Public Comment

Stephen Beale commented on the previously approved minutes of the November 18, 2023 Commission meeting. He found several inconsistencies that he brought to the Commissioners attention.

## Agenda Item 4. Water Quality & Watershed Report- Erica Kidd

At the time of the meeting the lake was still frozen, freeze up occurred on January 19, 2024 which was later than normal. Turbidity is typical for this time of year and clarity and temperature graphs are attached to the Commission report.

Watershed Manager Kidd gave an update on the Wilson Bluffs retention pond remediation work. Fortin construction has completed all of the repairs outlined by Commission Clerk Broadbent last fall. Erica plans to conduct a site meeting this Spring to review the work.

Water Resource Services has completed a draft phosphorus assessment of the watershed. The assessment includes many recommendations for remediation work. Watershed Manager Kidd reported that she was meeting with WRI the following day along with staff from both water entities. Commissioner Parrish asked if a map could be added to the report showing sample locations.

## Agenda Item 5. Clerk and Staff Reports

- a. Commission Clerk Mike Broadbent

Commission Clerk Broadbent asked the Commissioners if they would accept the amendments to the minutes as outlined by Mr. Beal during open session.

**Vote 7            On a motion by Commissioner Holmes and seconded by Commissioner Bilodeau to accept the amendments to the minutes of the November 18, 2023 Commission Meeting as outlined by Mr. Beale.**

**Passed 6-0**

Commission Clerk Broadbent then gave a report on the work of the Auburn Water District, Water Quality Ad-Hoc Committee. The Committee has met twice in the last month, topic of discussion includes. Septic system inspections in the watershed, how many should be done annually, who should be doing the inspections and when should they start. The Committee also discussed how best to engage with the upper watershed towns. To be most effective in protecting the Lake Auburn Watershed the recent ordinances passed in Auburn should be considered in the upper watershed towns as well.

Agenda Item 6. Old Business

a. 2024 Commission Budget

Commission Treasurer Roy reported that she worked with Commissioner Hunter and the Watershed manager to amend the budget to reflect a zero percent increase. The amendments were made to the Education and Outreach position in addition to Timber Harvest budget line. Treasurer Roy also reported that the annual Commission audit is underway and on schedule.

*Commissioner Landry re-joined the meeting*

**Vote 8            On a motion by Commissioner Hunter and seconded by Commissioner Holmes to approve the 2024 Budget as amended.**

**Passed 7-0**

b. Education and Outreach Coordinator Job Description

Watershed Manager Kidd reported that she will work with Mike and Kevin to review the job description and recommend potential adjustments. This could include septic inspections and watershed control measures. There is potential to get some of the funding for this position through grants.

c. Executive Session

**Vote 9            On a motion by Commissioner Hunter and seconded by Commissioner Holmes to go into executive session to discuss a potential land transaction in accordance with 1 M.R.S.A. 405 (6) (C).**

**Passed 7-0**

**The Commission came out of executive session at 4:16pm**

**Vote 10 On a motion by Commissioner Holmes and seconded by Commissioner Hunter to work with the developer's representative as agreed upon during executive session.**

**Passed 7-0**

Agenda Item 7. New Business

- a. Confirm appointment to the Lake Auburn Stakeholders Group created by the City of Auburn.

**Vote 11 On a motion by Commissioner Hunter and seconded by Commissioner Landry to affirm appointing Commissioner Parrish and Watershed Manager Kidd to the Stakeholders Group.**

**Passed 6-0-1 Commissioner Parrish Abstained from the vote.**

- b. LAWPC Commissioner appointment renewals

Commissioner Holbrook reported that he is set to attend the Turner select board meeting in the coming week.

Commissioner Holmes reported that he has sent letters to the three towns expressing interest in renewing.

Agenda Item 9. Adjournment

**Vote 12 On a motion by Commissioner Landry and seconded by Commissioner Parrish to adjourn the meeting.**

**Passed 7-0**

# Lake Auburn Watershed Protection Commission

## Special Meeting

**Wednesday, March 13, 2024**

**Location:** Androscoggin Valley Council of Governments (AVCOG), Auburn, Maine

**Time:** Meeting began at 3:00 PM

**Recording:** The meeting was video recorded. A link to the video is on the Commission website.

**Commissioners Present:** Alan Holbrook, Heather Hunter, Brad Kowalski, Dan Bilodeau, Glen Holmes, David Chittim, Kevin Gagne and Camille Parrish

**Commissioners Absent:** Amy Landry

**Others Present:** Michael Broadbent Commission Clerk, Erica Kidd Watershed Manager, Tracy Roy Commission Treasurer.

**Agenda Item 1. Presentation by Ken Wagner of Water Resource Services and Jen Jespersen of Ecological Instincts on the Phosphorus Reduction Analysis of Lake Auburn.**

WRI was hired by the commission to complete this report, they provided a draft report to Commissioners in January and gave a presentation on the report at this meeting. The project was made easy by the excellent data provided by staff. Overall the consultants are recommending that the Commission look to reduce the current phosphorus load by 30% and they made several recommendation on how to accomplish this.

**Agenda Item 2 Public Comment**

Steven Beal commented on the difference between an original draft released by the consultant and an updated version provided before the meeting.

Holly Ewing asked the consultants about remediation work that had been done since the CDM Smith report was completed back in 2013.

**Vote 1        On a motion by Commissioner Hunter and seconded by Commissioner Holmes to adjourn the meeting.**

**Passed**

<b>Lake Auburn Watershed Commission</b> <b>Balance Sheet</b> <b>31-Mar-24</b>
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	<b>Operating Account</b>	<b>Sinking Fund</b>	<b>YTD Combined</b>	<b>2023 Combined</b>	<b>2022 Combined</b>	<b>2021 Combined</b>
<b>Assets:</b>						
Cash - Interest Bearing Accounts	254,482.26	5,782.82	260,265.08	260,175.32	272,193.54	396,433.64
Cash - TD Bank	53,313.35		53,313.35	74,980.12	-	-
Savings - Key Bank	-		-	-	101,765.20	101,755.02
Savings - Milestones		56,250.80	56,250.80	56,250.80	54,714.20	54,372.14
ASB Certificate of Deposit	111,279.50	111,279.50	222,559.00	222,559.00	216,973.79	215,459.80
Accounts Receivable			-	8,787.46	750.00	45,465.00
Due From Other Funds		(1,795.05)	(1,795.05)	5,634.91	(15,110.24)	34,711.36
Prepaid Insurance	6,023.67		6,023.67	6,023.67	5,887.50	6,654.55
<b>Total Current Assets</b>	<b>425,098.78</b>	<b>171,518.07</b>	<b>596,616.85</b>	<b>634,411.28</b>	<b>637,173.99</b>	<b>854,851.51</b>
<b>Property, Plant &amp; Equipment:</b>						
Land	1,723,425.00	3,246,634.58	4,970,059.58	4,970,059.58	4,969,790.02	4,846,808.52
Improvements to Facility	37,344.32	184,463.45	221,807.77	221,807.77	221,807.77	221,807.77
Dam	169,288.98		169,288.98	169,288.98	169,288.98	169,288.98
Equipment	199,856.37		199,856.37	199,856.37	148,008.89	148,008.89
Intangible Assets	25,791.08	326,771.57	352,562.65	352,562.65	352,562.65	352,562.65
Construction Work in Process			-	-		
	2,155,705.75	3,757,869.60	5,913,575.32	5,913,575.32	5,861,458.28	5,738,476.78
Less Amortization of Intangible Assets	(25,791.08)	(326,771.57)	(352,562.65)	(352,562.65)	(352,562.27)	(352,562.27)
Less Accumulated Depreciation	(337,037.94)	(184,463.45)	(521,501.39)	(521,501.39)	(519,911.32)	(516,114.38)
<b>Total Property, Plant &amp; Equipment</b>	<b>1,792,876.73</b>	<b>3,246,634.58</b>	<b>5,039,511.28</b>	<b>5,039,511.28</b>	<b>4,988,984.69</b>	<b>4,869,800.13</b>
<b>Total Assets</b>	<b>2,217,975.51</b>	<b>3,418,152.65</b>	<b>5,636,128.15</b>	<b>5,673,922.58</b>	<b>5,626,158.68</b>	<b>5,724,651.65</b>
<b>Liabilities, Retained Earnings and Fund Balance:</b>						
<b>Liabilities:</b>						
Due to Other Funds	(1,795.05)		(1,795.05)	5,634.91	(15,110.24)	34,711.36
Accounts Payable			-	44,261.65	15,481.73	27,592.56
<b>Total Liabilities</b>	<b>(1,795.05)</b>	<b>-</b>	<b>(1,795.05)</b>	<b>49,896.56</b>	<b>371.49</b>	<b>62,303.92</b>
<b>Retained Earnings &amp; Fund Balance:</b>						
Retained Earnings	2,219,770.56		2,219,770.56	2,198,445.72	2,225,576.54	2,218,418.12
Reserve for Future Land Acquisitions		3,418,152.65	3,418,152.65	3,425,580.31	3,400,210.66	3,443,929.61
<b>Total Retained Earnings &amp; Fund Balance</b>	<b>2,219,770.56</b>	<b>3,418,152.65</b>	<b>5,637,923.20</b>	<b>5,624,026.02</b>	<b>5,625,787.19</b>	<b>5,662,347.73</b>
<b>Total Liabilities, Retained Earnings and Fund Balance</b>	<b>2,217,975.51</b>	<b>3,418,152.65</b>	<b>5,636,128.15</b>	<b>5,673,922.58</b>	<b>5,626,158.68</b>	<b>5,724,651.65</b>

**Lake Auburn Watershed Commission  
Statement of Revenues & Expenditures  
31-Mar-24**

	Original Operating Budget	Final Operating Budget	Operating Account	Balance	Sinking Fund	YTD Combined	12/31/23 Combined	12/31/22 Combined
<b>Revenues:</b>								
Contributions - AWD	60,000.00	60,000.00	7,289.10	52,710.90	6,249.99	13,539.09	85,000.00	78,250.00
Contributions - LWD	60,000.00	60,000.00	15,000.00	45,000.00	3,123.90	18,123.90	85,000.00	78,250.00
Timber Harvesting	2,000.00	2,000.00	-	2,000.00	-	-	2,625.00	29,312.96
Reimbursement	-	-	-	-	-	-	87.46	-
Gain on Sale of Assets	-	-	-	-	-	-	2,119.50	-
Water Withdrawal Revenue	-	-	-	-	-	-	-	386.70
Intergovernmental	2,000.00	2,000.00	-	2,000.00	-	-	43,375.00	2,250.00
Interest	35.00	35.00	1,683.54	(1,648.54)	2.30	1,685.84	8,498.28	2,312.40
<b>Total Revenues</b>	<b>124,035.00</b>	<b>124,035.00</b>	<b>23,972.64</b>	<b>100,062.36</b>	<b>9,376.19</b>	<b>33,348.83</b>	<b>226,705.24</b>	<b>190,762.06</b>
<b>Expenditures:</b>								
Auburn Water Department	6,000.00	6,000.00	201.11	5,798.89	-	201.11	18,619.01	5,945.74
Lewiston Water Division	6,000.00	6,000.00	-	6,000.00	-	-	29,838.93	23,636.17
Executive Administration	550.00	550.00	-	550.00	-	-	-	511.54
Forestry	3,500.00	3,500.00	-	3,500.00	-	-	1,025.00	7,125.19
Outside Services	3,325.00	3,325.00	-	3,325.00	-	-	8,185.00	1,850.00
Sanitary Facilities	3,760.00	3,760.00	-	3,760.00	-	-	2,750.00	2,745.00
Source Protection	63,150.00	63,150.00	1,324.66	61,825.34	16,803.85	18,128.51	84,822.74	114,663.40
Repairs to Property & Equipment	3,800.00	3,800.00	-	3,800.00	-	-	1,329.09	4,077.26
Public Education	1,775.00	1,775.00	-	1,775.00	-	-	543.54	-
Public Ed. - Labor	30,515.00	30,515.00	-	30,515.00	-	-	26,628.41	24,284.33
Public Ed. - Supplies	1,400.00	1,400.00	-	1,400.00	-	-	2,362.67	899.38
Public Ed. - Events	2,000.00	2,000.00	-	2,000.00	-	-	429.47	570.81
Public Ed. - Outside Services	2,400.00	2,400.00	398.00	2,002.00	-	398.00	3,074.99	1,184.00
Public Ed. - Public Relations	2,800.00	2,800.00	-	2,800.00	-	-	-	1,852.88
Public Ed. - Miscellaneous	250.00	250.00	-	250.00	-	-	91.98	392.68
Liability & D&O Insurance	12,000.00	12,000.00	264.20	11,735.80	-	264.20	11,182.83	10,958.05
Legal	10,500.00	10,500.00	-	10,500.00	-	-	2,094.50	9,427.50
Audit/Financial Services	7,395.00	7,395.00	-	7,395.00	-	-	5,622.81	7,191.25
Property Taxes	4,165.00	4,165.00	338.41	3,826.59	-	338.41	4,928.91	3,994.73
Operational Supplies	1,000.00	1,000.00	-	1,000.00	-	-	766.04	755.39
Depreciation/Amortization Expense	-	-	-	-	-	-	3,844.94	3,796.94
Miscellaneous	850.00	850.00	121.42	728.58	-	121.42	20,325.56	1,460.36
<b>Total Expenditures</b>	<b>167,135.00</b>	<b>167,135.00</b>	<b>2,647.80</b>	<b>164,487.20</b>	<b>16,803.85</b>	<b>19,451.65</b>	<b>228,466.42</b>	<b>227,322.60</b>
Excess Revenues Over Expenditures	(43,100.00)	(43,100.00)	21,324.84		(7,427.66)	13,897.18	(1,761.18)	(36,560.54)
Retained Earnings/Fund Balance, 1/1			2,198,445.72		3,425,580.31	5,624,026.02	5,625,787.19	5,662,347.73
<b>Retained Earnings/Fund Balance, 12/31</b>			<b>2,219,770.56</b>		<b>3,418,152.65</b>	<b>5,637,923.20</b>	<b>5,624,026.02</b>	<b>5,625,787.19</b>

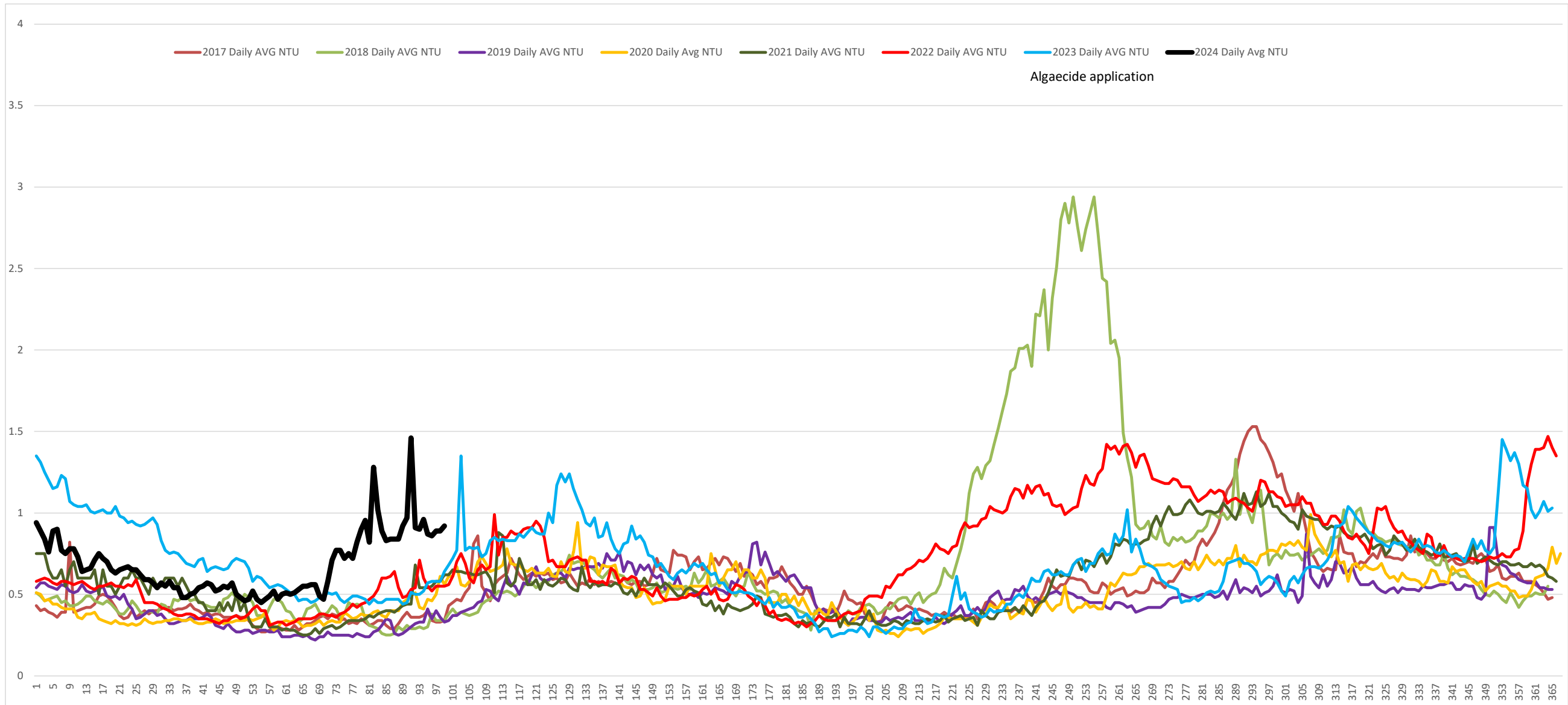


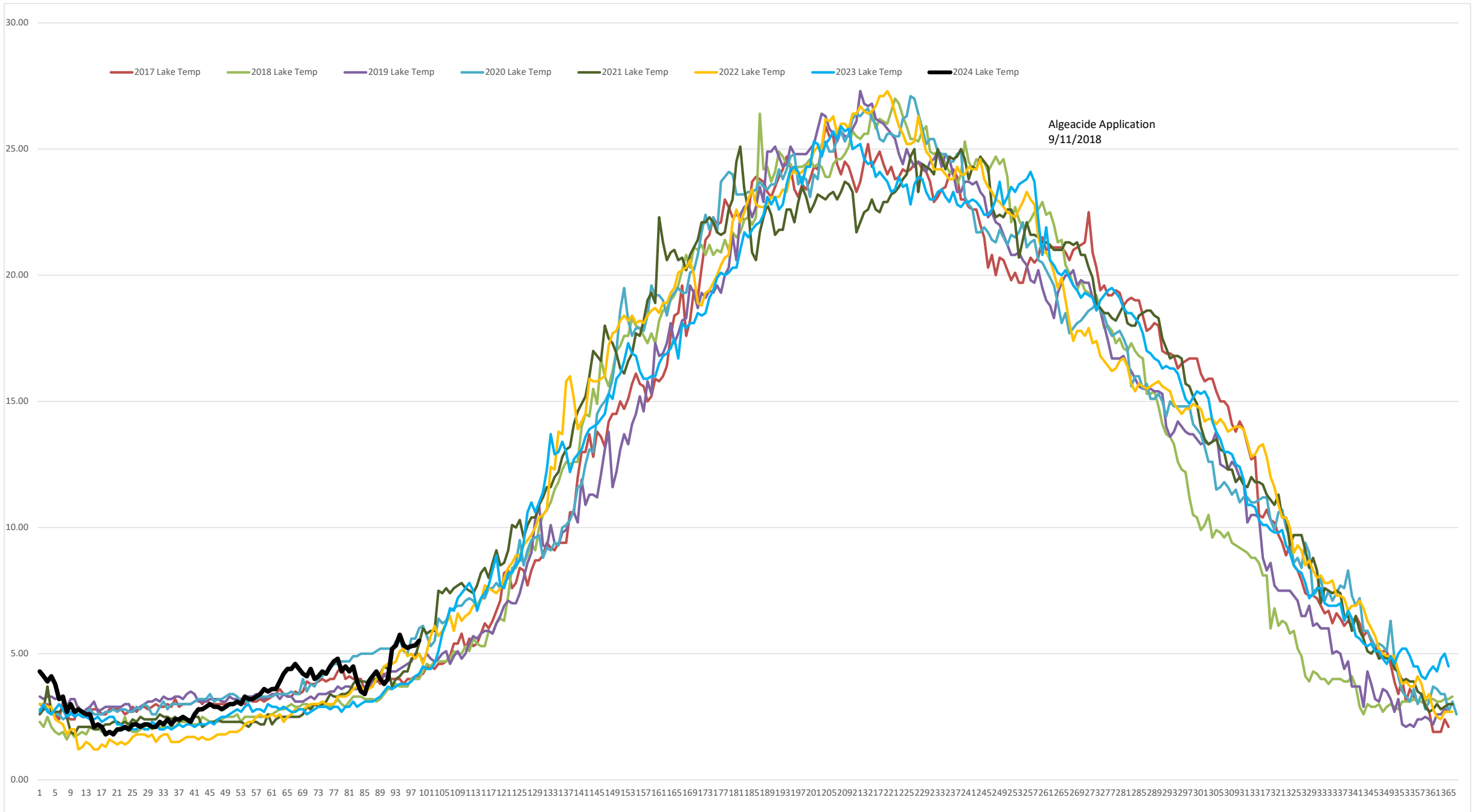
## Water Quality Report

1. Ice-on was 1/19/2024 and ice-out was 3/13/2024. This is the earliest ice-out date that we have on record going back to 1836. Ice coverage lasted for 55 days, which is the shortest duration of ice cover we have seen since ice-on data started being recorded 1953.
2. Average turbidity:
  - a. February was 0.51 NTU in 2024, and 0.67 NTU in 2023.
  - b. March was 0.76 NTU in 2024, and 0.48 NTU in 2023.
3. Please see attached turbidity and temperature graphs for reference.
4. February and March fecal datasheets are attached.
5. Staff are preparing the new pontoon boat and sampling equipment for the lake sampling season.

## Watershed Report

1. **Phosphorus Assessment:** The phosphorus assessment and alternatives analysis by Ken Wagner of Water Resource Services and Jen Jespersen of Ecological Instincts is finished and was presented to the board on 3/13/24. Ken and Jen will present their findings virtually to representatives from the Maine Drinking Water Program and Maine DEP, as well as staff, on 4/23/24. The purpose of this meeting is to get feedback from DWP and DEP on the potential phosphorus mitigation measures.
2. **Septic Inspection Program:** The City of Auburn has ordinance language that requires septic systems in the Lake Auburn watershed to be inspected every 5 years, and at the time of sale of a residence. Staff have been working with the City planning department to determine how to carry out a septic inspection program. AWD and LWD have applied for grant funds from the DWP to support this effort. There has been discussion of LAWPC overseeing the septic inspection program.
3. **Youth Conservation Corps:** The Androscoggin Valley Soil & Water Conservation District is interested in starting a YCC program in Auburn and the director contacted Erica about potential LAWPC involvement and funding. AVSWCD also reached out to the City of Auburn, Taylor Pond Association, and DEP about participating in the program and offering funds. The program runs for 8 weeks during the summer and is for students to carry out environmental projects, which could include projects on LAWPC land. LAWPC could contribute funds in 2025 to support the program.





Mar-  
24

INLINE

Collected			Temp	Turbidity		Ph	Amount	FECAL	QUANTITRAY		Fecal
DATE	TIME	BY	*C	1720E	TU5200	230 A	Sample	BACTERIA CFU	TOTAL	E.COLI	Confirmation
3/1	03:15	DAF	3.6	0.50	0.55	7.20	100 mL	1			P,P
3/2	04:05	DAF	3.6	0.50	0.55	7.25	100 mL	0			
3/3	04:20	DAF	3.9	0.55	0.60	7.22	100 mL	0			
3/4	03:20	DAF	4.2	0.55	0.55	7.14	100 mL	1	3.1	1	P,P
3/5	03:20	DAF	4.4	0.55	0.60	7.10	100 mL	0			
3/6	03:15	DAF	4.4	0.55	0.60	7.13	100 mL	1			P,P
3/7	04:05	DAF	4.6	0.55	0.60	7.07	100 mL	0			
3/8	03:15	DAF	4.4	0.55	0.60	7.14	100 mL	0			
3/9	08:15	LRB	4.2	0.55	0.60	7.26	100 mL	0			
3/10	08:05	LRB	4.1	0.55	0.60	7.23	100 mL	0			
3/11	03:10	DAF	4.4	0.55	0.65	7.15	100 mL	1	5.3	1	P,P
3/12	03:15	DAF	4.0	1.55	1.50	7.21	100 mL	1			
3/13	03:05	DAF	4.1	0.70	0.80	7.11	100 mL	0			
3/14	03:20	DAF	4.3	0.75	0.75	7.18	100 mL	0			
3/15	05:55	LRB	4.2	0.75	0.75	7.29	100 mL	0			
3/16	06:35	DAF	4.5	0.70	0.75	7.21	100 mL	0			
3/17	06:40	DAF	4.7	0.70	0.75	7.19	100 mL	1			P,P
3/18	03:05	DAF	4.8	0.85	0.90	7.17	100 mL	0	5.2	<1	
3/19	10:45	LRB	4.3	0.80	0.85	7.23	100 mL	0			
3/20	03:15	DAF	4.5	1.25	1.25	7.14	100 mL	0			
3/21	08:40	LRB	4.3	0.80	0.80	7.17	100 mL	0			
3/22	03:15	DAF	4.5	0.85	0.90	7.20	100 mL	0			
3/23	09:05	LRB	3.9	1.25	1.20	7.20	100 mL	0			
3/24	09:10	LRB	3.5	0.95	0.95	7.17	100 mL	1			P,P
3/25	10:10	LRB	3.4	0.85	0.80	7.24	100 mL	0	1	<1	
3/26	03:10	DAF	3.9	0.85	0.85	7.19	100 mL	1			P,P
3/27	03:15	DAF	4.1	0.85	0.90	7.22	100 mL	1			
3/28	03:20	DAF	4.3	0.85	0.85	7.24	100 mL	0			
3/29	03:10	DAF	4.0	0.85	0.85	7.18	100 mL	0			
3/30	05:40	DAF	3.8	0.90	0.95	7.21	100 mL	3			P,P/P,P/P,P
3/31	05:25	DAF	4.0	2.40	2.20	7.04	100 mL	0			

Feb-24

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Collected			Temp	Turbidity		Ph	Amount	FECAL	QUANTITRAY		Fecal
DATE	TIME	BY	*C	1720E	TU5200	230 A	Sample	BACTERIA CFU	TOTAL	E.COLI	Confirmation
2/1	03:10	DAF	2.3	0.55	0.55	7.25	100 mL	0			
2/2	03:10	DAF	2.2	0.55	0.55	7.28	100 mL	0			
2/3	05:55	DAF	2.4	0.55	0.60	7.31	100 mL	0			
2/4	06:05	DAF	2.2	0.55	0.60	7.24	100 mL	0			
2/5	03:00	DAF	2.4	0.50	0.55	7.28	100 mL	0	<1	<1	
2/6	02:45	DAF	2.4	0.50	0.55	7.33	100 mL	0			
2/7	03:10	DAF	2.5	0.55	0.60	7.27	100 mL	0			
2/8	03:00	DAF	2.4	0.55	0.60	7.31	100 mL	0			
2/9	03:05	DAF	2.3	0.50	0.60	7.33	100 mL	0			
2/10	08:15	LRB	2.6	0.50	0.60	7.34	100 mL	0			
2/11	08:10	LRB	2.8	0.50	0.50	7.32	100 mL	0			
2/12	03:15	DAF	2.8	0.60	0.65	7.34	100 mL	1	<1	<1	P/P
2/13	03:00	DAF	2.9	0.55	0.60	7.32	100 mL	0			
2/14	03:00	DAF	3.0	0.55	0.60	7.35	100 mL	0			
2/15	03:10	DAF	2.9	0.55	0.60	7.29	100 mL	0			
2/16	03:00	DAF	2.9	0.55	0.60	7.32	100 mL	0			
2/17	05:55	DAF	2.8	0.55	0.60	7.24	100 mL	0			
2/18	06:15	DAF	2.9	0.50	0.60	7.26	100 mL	0			
2/19	05:55	DAF	3.0	0.50	0.60	7.21	100 mL	0	<1	<1	
2/20	02:50	DAF	3.0	0.50	0.55	7.25	100 mL	0			
2/21	03:00	DAF	3.1	0.50	0.55	7.28	100 mL	0			
2/22	03:00	DAF	3.0	0.50	0.55	7.24	100 mL	0			
2/23	03:05	DAF	3.3	0.50	0.50	7.26	100 mL	0			
2/24	09:00	LRB	3.2	0.45	0.50	7.24	100 mL	0			
2/25	09:10	LRB	3.2	0.50	0.55	7.21	100 mL	0			
2/26	03:05	DAF	3.3	0.50	0.55	7.23	100 mL	0	1	<1	
2/27	03:00	DAF	3.4	0.50	0.55	7.22	100 mL	0			
2/28	03:10	DAF	3.6	0.50	0.55	7.19	100 mL	0			
2/29	03:05	DAF	3.5	0.50	0.60	7.21	100 mL	0			

## Memorandum

**To:** Auburn Water District Trustees and Michael Broadbent, Superintendent  
**From:** Michael A. Hodgins  
**Date:** February 21, 2024  
**Re:** Upper Watershed Protection Authority

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I have been asked by Mike Broadbent to prepare this memorandum to provide a legal opinion regarding the authority of the Auburn Water District (the "District") to adopt and/or enforce Ordinances in the towns in the upper watershed of Lake Auburn, beyond the territorial limits of the City of Auburn. In the event that the adoption of Ordinances appears to be permissible, I was asked to address additional questions referenced below, which were dependent upon the response to the first question.

### 1. Can the District adopt Ordinances in other towns?

The authority of the District is limited to the powers conveyed by the Legislature in the enabling legislation of 1923, as amended in 1965 and 1982. The Private and Special Law passed to incorporate the District is referred to as the Charter. The Charter does not provide the District with the authority to enact Ordinances outside of the territorial limits of the City of Auburn, nor does it allow the District to adopt Ordinances affecting citizens outside of the City of Auburn. A copy of the amended Charter, with the relevant language, is attached.

The basis for this opinion is found in the first section of the Charter, which sets forth the territorial limits of the District. The Charter grants the District authority over "the territory and people constituting the city of Auburn, except that portion of said city and the people therein within the following boundaries...." (Emphasis added). The Charter goes on to identify portions of the City that are outside of the territorial limits of the District, but all areas are apparently within the City of Auburn limits. Based upon the territorial reach of the District as set forth by the Maine Legislature, the District does not have authority outside of the borders of the City of Auburn, and does not have authority over people in neighboring communities.

While the limitations of Section 1 are fairly clear, there are other indications in the Charter that the District was not intended to have the power to legislate the use of properties in the upper watershed, beyond the boundaries of the City of Auburn. In Section 6, "Powers", the District does have the authority to adopt by-laws to prevent pollution of the water of Lake Auburn, which by-laws have the same force and effect as municipal Ordinances. This language likely is relied upon by some to suggest that the authority of the District extends beyond the territory of the City of Auburn, however, it would be difficult to argue this power exists outside of the territorial limits set forth in Section 1. Further, in the grant of powers in Section 6, the Legislature

specifically stated that the power to adopt bylaws was “not inconsistent with the general laws of the state.” Without an in-depth analysis of all laws of the State of Maine, it is reasonable to argue that the laws of this State do not allow one municipality, or quasi-municipal entity such as the District, to impose laws upon another municipality without specific grant of authority from the Legislature. Lastly, while the second half of Section 6 does give the District the authority to apply to the Supreme Judicial Court of the State of Maine to prevent persons or entities from polluting Lake Auburn, the application to the Court to prevent specific pollution is not the same as a grant of authority to enact municipal Ordinances generally.

Similar limitations on the authority of the District are found in Section 11 of the Charter. In that section, the District is given the authority to lay and maintain pipes in the streets of the City of Auburn and across private land in the city, however, that that authority is specifically limited to the City of Auburn, and does not extend outside of the territorial limits. Also, Section 7 gives the District eminent domain authority without expressly stating the geographic limits, but it would be difficult to argue that authority was intended outside of the territorial limits of the District.

Lastly, it is telling that the final approval of the Charter was governed by a referendum in the City of Auburn in 1923. That was because the District was taking title to property and exercising the powers previously exercised by the City and the Auburn Water Commissioners. It would be difficult, again, to conceive that a vote of residents of the City of Auburn could create enforcement mechanisms and the power to adopt Ordinances in other communities, when those communities were never provided the opportunity to vote to cede that authority to the District.

## **2. Who would have the authority to enforce Ordinances in the upper watershed towns?**

Clearly, if the District does not have authority to adopt Ordinances in the upper watershed towns, it would not have the authority to enforce those Ordinances. However, as an aside, we know that the LAWPC was created in 1993, with a directive to review, adopt and maintain water quality measures within the entire “Lake Auburn Watershed.” This is distinguished from the authority given to the District to enforce Ordinances in the watershed within the territorial limits of the City of Auburn. It is possible that people have read the language of the Basic Agreement to mean that the powers of the LAWPC were the equivalent of the powers of the District. However, since the District only has the powers granted to it in its Charter from the Maine Legislature, it could not create and transfer to the LAWPC any authority greater than what the District already possessed.

It bears note that the only parties to the Basic Agreement are the District, the City of Lewiston, and the Town of Turner. It would be difficult to read Section 1 of the Basic Agreement (attached, pp. 4-5), to grant general Ordinance authority to the LAWPC for all of the upper watershed. At best, it may grant the LAWPC some advisory capacity within the Town of Turner, but without participation and delegation of authority by the other upper watershed towns, the Basic Agreement alone would not give the LAWPC authority to enact land use Ordinances in all of the upper watershed, if such authority could even be argued within the Town of Turner.

Water Resource Services Inc.  
144 Crane Hill Road  
Wilbraham, MA 01095  
kjwagner@charter.net  
413-219-8071



April 3, 2024

**To:** Ms. Erica Kidd  
Lake Auburn Watershed Protection Commission  
Via email at [ekidd@awsd.org](mailto:ekidd@awsd.org)

**From:** Ken Wagner, WRS, Inc.

**Re:** Evaluation of ordinances for the Lake Auburn watershed

Dear Ms. Kidd and interested parties from the LAWPC and City of Auburn:

WRS, Inc. with its partner Ecological Instincts, has completed a review of materials provided with reference to existing and possible new ordinances to limit the input of nutrients and other contaminants to Lake Auburn. We did not receive a complete set of ordinances and there was limited upfront discussion of the materials, but we did have a productive meeting with the Mayor of Auburn and the staff of various departments that informed our review. Comments provided here are intended to help those responsible for developing and enforcing ordinances to do so with the best possible information on how such ordinances may affect water quality in Lake Auburn. Ordinances have the potential to infringe on what some would consider property rights and various legal issues may arise. We are not addressing those here, other than to acknowledge the need for balance between what can be done with land in the watershed of Lake Auburn with regard to lake water quality and what people might logically and legally be expected to desire for land they control. It is not an easy area of environmental management.

### **Introduction**

The fundamental value of ordinances lies in protecting resources that can be damaged by land use without restriction. The fundamental limitation of ordinances is that they rarely correct existing damage and focus on protection. That protection is valuable, but where the lake is already experiencing problems as a result of past and ongoing inputs from the watershed, especially from allowable land uses, it will not be enough to reverse the observed trend. Consider that Lake Auburn appears to have had a phosphorus concentration <5 ppb prior to any development of watershed lands, while that concentration rose to almost 11 ppb over a century or more. The 2019 phosphorus inactivation treatment of the lake reduced the concentration to <10 ppb. All possible management actions, without regard for cost or jurisdiction, could reduce the phosphorus concentration to just under 7 ppb. Development of land, therefore, is expected to increase phosphorus loading even with the best of controls. Getting phosphorus levels down to near 7 ppb would provide the conditions that safeguard the water supply, but that requires a reduction of about 3 ppb from current conditions. Ordinances that minimize phosphorus increase cannot achieve this major reduction in phosphorus concentration. Ordinances that actually reduce current loading will be a challenge to promulgate and enforce.





The above limitations notwithstanding, ordinances and the protection they offer remain important to watershed management. And if there is a way to expand coverage to existing or otherwise grandfathered uses, this could offer a reduction in loading. Such an effort is likely to be more education than enforcement, enticement rather than punishment, and funding support rather than forced expenditures. For example, one ordinance calls for addressing runoff quantity and quality for any new building addition >200 SF. If runoff controls were applied to the entire property experiencing increased building size rather than just the runoff produced by the new construction, reductions in overall contaminant release from the property could be achieved. If an antiquated on-site wastewater disposal system has to be upgraded to support building expansion, but the required setback distance is not available, some consideration is warranted for how much overall benefit might be achieved by wastewater disposal upgrade vs. not allowing the expansion. These are not actions that can easily be incorporated into ordinances and require greater support by professionals dedicated to a net benefit to the lake. Education, encouragement, and financial support for desired improvements to improve lake conditions will be needed.

Some ordinances that were reviewed and/or discussed are in place and others are under consideration. Which was which was not completely evident to us, so here we provide an overall framework for ordinance consideration without emphasis for what is in place vs. under consideration.

The ordinances we discussed fell into six major categories:

1. Residential/commercial land development restriction – what land can even be developed.
2. Residential/commercial wastewater controls – how wastewater is handled.
3. Residential/commercial runoff controls – how runoff is handled.
4. Agricultural land use controls – what land can be used for agricultural purposes.
5. Agricultural runoff controls – how runoff is handled.
6. Silviculture – logging restrictions and best practices.

### **Residential/commercial land development restriction**

Less new construction is better than more from the perspective of protecting or improving Lake Auburn. The lake phosphorus concentration, even with all feasible watershed controls, would be 67% higher than pre-settlement, and with current levels of control is about 100% higher. The watershed cannot be developed without impact to the lake, a fallacy often promoted but not supported by a wide range of studies and experience. Yet private property rights exist and preventing any development could constitute a taking of those rights. Purchase of land is highly desirable. Yet within the Auburn portion of the watershed there are currently about 325 residences with the potential for about 40 more, so preventing future development is likely to be less important to lake improvement than managing existing development. The limits codified in ordinances pertaining to new or expanded development are all reasonable. Yet the key to real improvement lies in how wastewater and runoff are handled on all watershed land and in getting other municipalities to enact and adhere to similar regulations.

### **Residential/commercial wastewater controls**

A setback of 400 feet from any wetland, stream, or lake with clear specifications for depth to groundwater and composition of the soil filtration layer is well formulated. While nitrogen is not likely to be controlled to any large extent by such precautions, phosphorus removal should be very



high. Any on-site wastewater disposal system that meets the setback and soil restrictions is likely to have minimal impact on Lake Auburn. Minimal does not mean none, but for practical purposes the impact could be considered negligible with proper system maintenance for many, many years.

The issue that arises is how to address currently inadequate systems that do not violate any ordinance for allowable continued use. Getting people to relocate and/or upgrade wastewater disposal systems could reduce inputs to the lake. Where expansion of construction on property is proposed, such improvement is called for, but where the ordinance conditions cannot be met, a decision must be made regarding overall potential benefit of an upgrade without meeting all ordinance conditions vs. disallowing expansion and leaving the system as is. On-site wastewater is not a dominant component of the phosphorus load to Lake Auburn, but the move to get such systems farther from water and in the correct soils or artificial media is still a step in the right direction and should be pursued.

Mapping the watershed for appropriate and undesirable soil conditions would be appropriate to support decisions on what to allow where, or for prioritizing replacement of older existing systems. Inspections are also important, and not just for new systems; having a program to evaluate existing systems that may be antiquated or otherwise less effective would be appropriate. An ordinance to allow evaluation of any on-site wastewater disposal would help, although what can be done about existing systems that would benefit from upgrade is not entirely clear at this point.

### **Residential/commercial runoff controls**

Runoff is a major source of phosphorus and other contaminants to Lake Auburn. Reducing runoff and improving the quality of that runoff is an essential part of lake protection and improvement. Minimum lot size and encouraging Low Impact Development techniques are helpful but not necessarily sufficient, depending on soils, vegetation, slopes, and the proximity to water resources. Ordinances that require detention or buffer zones are helpful but must also specify the features of the detention facility or buffer zone. Simply leaving an area unpaved or unmowed is not sufficient. Simply setting some minimum distance from the property boundary where actions are restricted may not be adequate either, given soils, vegetation, slopes, and proximity to streams. Where natural conditions allow runoff to pass through any area with minimal treatment, engineering is necessary to maximize containment and treatment.

Specifications might best focus on the quantity and quality of water leaving the property, not just desired conditions on the property such as buffer zones or detention areas. This requires monitoring and is the only way to document that desired conditions are being achieved. Ordinances that specify distances, cover type, and other features perceived as beneficial to limiting runoff are not as useful as those that specify the quantity and quality of runoff that may leave a site and require proof of standard achievement. Whether the monitoring is geared toward meeting some numeric standard or confined to more qualitative observations, such as the visual quality of runoff collected during storms, some evaluation of how well existing controls are working is needed.

### **Agricultural land use controls**

Agriculture at any scale has the potential to impact water quality in Lake Auburn. Crops of any kind usually result in some kind of fertilizer application and some period of bare soil. Animals create manure that must be processed. The distinction between commercial and hobby farms is

less useful than a focus on the intensity of activities on agricultural land and how agricultural activities are conducted. Preventing agriculture, much like preventing development, is desirable from the perspective of protecting and improving Lake Auburn, but property rights will limit how restrictive any municipality can be. Yet it is reasonable to call for restrictions where agricultural activities will have a measurable and apparent impact on water quality in the lake.

Manure handling is no different than human waste disposal. Failure to prevent contaminated runoff from entering streams and ultimately Lake Auburn has the potential to cause serious degradation very quickly. There is really no room to allow manure spreading on land within the Lake Auburn watershed; the risk is just too great, even with the best of controls. Rainfall is not controllable, and runoff cannot be completely contained. Manure will need to be moved out of the watershed or handled in some way that does not allow exposure to precipitation or contamination of runoff.

### **Agricultural runoff controls**

Where agriculture exists, runoff controls are paramount to protecting downstream resources. Climate change is producing larger storms that generate more runoff. Any contaminants on surficial soils are a threat. This applies to fertilizers and pesticides, although limited use under appropriate conditions is possible. Not applying fertilizer could result in bare soil more susceptible to runoff, but established cover needs little additional phosphorus, so soil testing is a key aspect of fertilizer management (which applies to residential/commercial development as well as agriculture). Agricultural activities should be held to standards for runoff quantity and quality that reflect pre-agricultural use of the subject land, even if pre-agricultural runoff conditions can only be approached, not attained.

As noted in the discussion of residential/commercial runoff management, this requires some monitoring to document achievement of desired conditions. The use of turbidity as a surrogate parameter to reflect how well runoff is being managed is relatively easy and inexpensive and is being used in NH. Even observational monitoring, whereby runoff is collected and photographed in a jar with notation of any color, odor, oily sheen, and/or accumulation of material on the bottom after an hour of settling, can be useful in this regard. The program does not have to be expensive, cumbersome, or punitive, but some form of measurement is desirable. Specifications for actions to be taken to minimize runoff quantity and quality are appropriate but are not sufficient without documentation of success. Where set standards or qualitative conditions are not achieved, more management is needed. Much as with urban runoff, the key to real improvement lies in how waste and runoff are handled and in getting other municipalities to enact and adhere to similar regulations.

### **Silviculture**

Timber harvest is regulated and while related soil disturbance is a threat to Lake Auburn, silvicultural activities are possible within the watershed without damaging the lake. In fact, a newly growing forest takes up more nutrients than a mature one, so there can actually be some benefit to harvesting older trees. The issue lies in the soil disturbance that almost always accompanies a timber harvest. The suggestion that timber harvests should be restricted to times when the ground is frozen is appropriate; disturbance will be minimized. The use of slash or other materials to cover disturbed areas is appropriate, but unless the cover is complete, involving wood chips or similar cover materials, some erosion is possible until vegetative growth is sufficient to stabilize disturbed



soils. Creating disturbance along lines of the same elevation and avoiding creation of channels running downslope will help, but stabilization as soon as possible after disturbance remains important to protecting downgradient resources, including Lake Auburn.

In all of the above categories of environmental management, monitoring, inspection and enforcement are important components, and not just during any construction or start-up phase. Some ordinances call for inspection access and compliance documentation, and this is appropriate, but educational efforts are critical to public acceptance. Getting landowners and users in the Lake Auburn watershed to understand the importance of their actions to the quality of Lake Auburn will be an important and ongoing effort. Since most watershed residents do not get their potable water from the lake, this represents a challenge, but education followed by enforcement is still the preferred course.



**Auburn Water and Sewerage Districts**  
268 Court Street · Auburn, ME 04210  
PO Box 414 · Auburn, ME 04212-0414  
Tel: (207) 784-6469 · <https://www.awsd.org>

March 19, 2024

**Via Certified Mail, Return Receipt Requested, First Class Mail, and Electronic Mail**

**Amy M. Landry**  
Executive Director  
Androscoggin Valley Council of Governments  
125 Manley Rd, Auburn, ME 04210  
Ph: 207-783-9186 Ext. 210

**RE: Auburn Water District's and City of Lewiston's Notice of Submission of the First Amendment to the Interlocal Agreement for Lake Auburn Watershed Protection**

Dear Executive Director Landry:

As you know, on June 29, 1993, the Auburn Water District, the City of Lewiston and the Inhabitants of the Town of Turner signed an Interlocal Agreement for Lake Auburn Watershed Protection (the Basic Agreement).

The AWD and Lewiston have negotiated the enclosed First Amendment to the Basic Agreement, which clarifies the location of the "watershed," as that term is used in the Basic Agreement, and sets forth the process that Auburn Water District will follow for future changes to the boundary of the watershed. On December 19, 2023, the Lewiston City Council approved the First Amendment to the Basic Agreement. On December 20, 2023, the AWD Board of Trustees approved the First Amendment to the Basic Agreement. The Town of Turner has indicated its approval by signing the First Amendment to the Basic Agreement.

This First Amendment is limited to the procedures referenced above, and does not modify the parties to the Basic Agreement itself, or the scope of the agreement. To the extent this amendment requires review and comment by AVCOG, AWD and Lewiston hereby submit the First Amendment to the Interlocal Agreement for Lake Auburn Watershed Protection to the Androscoggin Valley Council of Governments, pursuant to 30-A M.R.S. § 2203(6) and 30-A M.R.S. § 2342(6). We respectfully request that AVCOG provide any comments within 30 days, as set forth in statute, so the municipal entities can move this forward expeditiously.

Please contact either of us if you have questions.

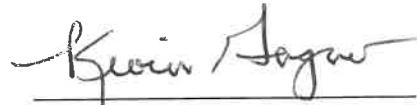
Sincerely,



---

Michael Broadbent  
Superintendent  
Auburn Water District

Enclosure



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Kevin Gagne, P.E.  
Water & Sewer Superintendent  
City of Lewiston  
Water & Sewer Division

FIRST AMENDMENT  
INTERLOCAL COOPERATION AGREEMENT  
FOR LAKE AUBURN WATERSHED PROTECTION

This First Amendment to Interlocal Cooperation Agreement For Lake Auburn Watershed Protection is made on the 19<sup>th</sup> of March, 2024, by and between the City of Lewiston (“Lewiston”), a municipal corporation, the Trustees of the Auburn Water District (the “AWD”), a Maine quasi-municipal corporation, and Inhabitants of the Town of Turner, all located in the County of Androscoggin and State of Maine, for the purposes of more specifically identifying the boundary of the Lake Auburn watershed and the process for future changes to that boundary.

WHEREAS, on June 29, 1993, Lewiston, the AWD and Town of Turner entered into an Interlocal Cooperation Agreement for Lake Auburn Watershed Protection (the “Basic Agreement”), pursuant to 30-A M.R.S., Chapter 115;

WHEREAS, the Basic Agreement describes the term “Watershed” of Lake Auburn as “cover[ing] approximately 15.31 square miles”;

WHEREAS, the AWD has adopted bylaws, as amended, that separate the Watershed into four zones of protection each which is defined by the bylaws and is specifically identified and mapped on the official Lake Auburn and Lake Auburn Watershed Protection Zone map on file with the Auburn Water District (the “Official Watershed Map”);

WHEREAS, Lewiston filed a Declaratory Judgment action against AWD in the Maine Superior Court, on or about May 12, 2022, challenging AWD’s revision of the Watershed boundary and the amendment of the Lake Auburn and Lake Auburn Watershed Protection Zone map in a vote of the AWD Board of Trustees taken on April 20, 2022, and said litigation remains pending in the Superior Court, Business and Consumer Docket No. BCD-CIV-2022-031;

WHEREAS, on August 7, 2023, Lewiston and AWD submitted a joint request to the Maine Drinking Water Program with an accompanying map to re-delineate, pursuant to 30-A M.R.S. § 2001(20-A), those areas of the Source Water Protection Area of Lake Auburn that fall within a 148-acre contiguous parcel of land depicted on the maps identified as the “Gracelawn Parcel”, within the City of Auburn;

WHEREAS, on September 5, 2023, the Maine Drinking Water Program (the “MDWP”) approved a change to the watershed boundary line through the Gracelawn Parcel after CDM Smith completed a three-dimensional visualization and analysis model of existing/historical data to investigate groundwater flow in the parcel;

WHEREAS, on November 15, 2023, the Auburn Water District Trustees amended the Official Watershed Map to reflect the updated Watershed boundary line through the Gracelawn Parcel;



WHEREAS, on 12/4/2023, the City Council of the City of Auburn amended the Lake Auburn Watershed Protection Overlay District to reflect the updated Watershed boundary line through the Gracelawn Parcel;

WHEREAS, disputes about the location of the Watershed boundary line through the Gracelawn Parcel have played out in engineering studies and reports, actions of municipal and quasi-municipal legislative bodies, direct citizen legislative action, a lawsuit, and regulatory action;

WHEREAS, the AWD and Lewiston have cooperated to protect the water quality of Lake Auburn and minimize rates for their customers since before they entered into the Basic Agreement, and their cooperative partnership continued over the last two years despite disagreements regarding land use and zoning changes in the Watershed; and,

WHEREAS, the AWD and Lewiston wish to avoid future disagreements about the specific location of the Watershed by entering into this Agreement to memorialize their shared current understanding about the specific location of the boundary of the Lake Auburn Watershed, and to agree on a process for changes to that boundary; and so,

NOW, THEREFORE, in consideration of their mutual promises and undertakings in this Agreement, the City of Lewiston, Auburn Water District and the Town of Turner hereby agree to amend the Basic Agreement, as follows:

A. The parties agree that to understand, interpret, effectuate, or enforce this Agreement or the Basic Agreement the term “Watershed” shall mean the portions of the City of Auburn, Town of Turner, Town of Hebron, Town of Buckfield and Town of Minot that contribute surface water or groundwater to recharge Lake Auburn as identified and mapped on the Official Watershed Map, which may be revised and amended from time to time by the Trustees of the Auburn Water District as provided herein.

B. The parties agree that, based on current data, the Official Watershed Map that the Auburn Water District trustees adopted on November 15, 2023 accurately identifies and maps the Watershed.

C. The Auburn Water District pledges, covenants and agrees that so long as the Basic Agreement remains in effect it will not revise or amend the Official Watershed Map, except after receiving MDWP approval pursuant to 30-A M.R.S. § 2001(20-A). Before seeking MDWP approval Auburn Water District shall provide notice of a specific proposed change to the Official Watershed Map to the Superintendent of the City of Lewiston Water Division, to the Chair and Vice Chair of the Lake Auburn Watershed Protection Commission, to the City Administrator of the City of Auburn, by publishing it to its website, and pursuant to any other means that the Auburn Water District regularly notifies the public of its meetings. No less than 30 days after providing such notice, after considering comment by the City of Lewiston, the City of Auburn, the Lake Auburn Watershed Protection Commission or the public, the AWD Board of Trustees may



recommend a proposed change to the Official Watershed Map. After such recommendation, if any, the AWD shall seek MDWP approval of the change to the Watershed Map, pursuant to 30-A M.R.S. § 2001(20-A). After the AWD receives MDWP approval or direction, the AWD shall revise and amend the Official Watershed Map consistent with such approval or direction.

D. The parties agree that this Agreement represents a written amendment to the Basic Agreement solely to clarify the location of the "Watershed" as used in the Basic Agreement, and the terms of further revisions or amendment of the Official Watershed Map, and that all further provisions of the Basic Agreement that are not inconsistent with this Agreement shall remain in full force and effect.

E. The parties agree that this Agreement is entered into in multiple duplicate originals, each of which may be taken as an original and shall be interpreted, enforced, and applied in accordance with the laws of the State of Maine. No amendment shall be effective unless in writing and signed by the party against whom enforcement is sought.

IN WITNESS WHEREOF, the parties have each caused this instrument to be executed and delivered on their, behalf by their duly authorized representatives as set forth below, as of the day and year first specified above.

CITY OF LEWISTON

Dated: 3/19/2024

Heather Hunter  
By: Heather Hunter  
Its: City Administrator

STATE OF MAINE  
COUNTY OF ANDROSCOGGIN

This record was acknowledged before me on March 19, 2024, by Heather Hunter as City Administrator for the City of Lewiston.

Janet D. Rabbe  
Notary Public/Attorney at Law  
Print Name: Janet D. Rabbe  
My commission expires: 06/07/2027

AUBURN WATER DISTRICT

Dated: 3/18/24

Michael Broadbent  
By: Michael Broadbent  
Its: Superintendent

INHABITANTS OF THE TOWN OF TURNER

Dated: 3/13/2024

  
\_\_\_\_\_  
By: Kurt Schaub  
Its: Town Manager