

Exhibit 7



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION III
1650 Arch Street
Philadelphia, Pennsylvania 19103-2029

May 19, 2014

Neal R. Devlin, Esquire
Knox, McLaughlin, Gornall & Sennett
120 West Tenth St
Erie, PA 16501-1461

Re: Robert Brace & Sons, Inc. – Erie County, Pennsylvania

Dear Mr. Devlin:

I am in receipt of your letter of April 22, 2014 wherein you requested that EPA opine on Mr. Brace's assertions that he is free to farm the Homestead and Murphy Farms and the adjacent property under a farm exemption "to the extent one is necessary."

Given the evolving configuration of Mr. Brace's property due to the recent purchases of adjacent lands, as well as the perennial questions of which portions of Mr. Brace's property are jurisdictional, which portions are exempt under the Clean Water Act's farming exemptions set forth at Sections 404(f)(1)(A) and (C), 33 U.S.C. § 1344(f)(1)(A) and (C), and which portions of Mr. Brace's property are uplands, EPA recommends, as it has done on numerous occasions (most recently in the August 29, 2013 correspondence from Scott Hans and Jeff Lapp, and again in a telephone conversation with your attorney, Tim Ziezulla, on November 12, 2013), that Mr. Brace avail himself of the services of a qualified wetlands consultant who can perform a delineation that may be presented to the U.S. Army Corps of Engineers ("Corps") with a request to conduct a jurisdictional determination (JD).

Alternatively, if Mr. Brace does not wish to hire a consultant, he may contact the Corps and request an approved JD, as defined in 33 C.F.R. 331.2, in accordance with Regulatory Guidance Letter 08-02, attached hereto for reference. Obtaining an approved jurisdictional determination for some, or all of the properties under Mr. Brace's ownership, will provide Mr. Brace with the United States' definitive assessment as to which waters are, or are not jurisdictional, and which waters are, or are not subject to exemption.

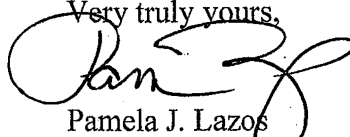


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Should you have any questions about the process or any of the issues raised in this letter, feel free to contact me at 215.814.2658, or email me at lazos.pamela@epa.gov.

Thank you for your continued cooperation in this matter.

Very truly yours,



Pamela J. Lazos
Sr. Asst. Regional Counsel

cc: Scott Hans, USACE
Dana Adapietro, USACE



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