# RYE CONSERVATION COMMISSION MEETING

Thursday, January 9, 2020 7:00 p.m. – Rye Town Hall

Members Present: Chair Sally King, Vice-Chair Suzanne McFarland, Mike Garvan, Jeff Gardner, Jaci Grote, Susan Shepcaro, Heather Reed, Alternates Danna Truslow and Karen Oliver

## I. CALL TO ORDER AND PLEDGE OF ALLEGIANCE

Chair King called the meeting to order at 7:00 p.m. and led the Pledge of Allegiance.

## II. APPROVAL OF MINUTES

• December 12, 2019

The following corrections were noted:

- Page 1, it should be noted that the speaker from Pollinator Pathways was Vicki Brown, Natural Resource Steward.
- Page 1, last bullet under Pollinators: It should be **Ruby Throated Hummingbird**.
- Page 1, 2<sup>nd</sup> to last paragraph should read: **A Pathway is a volunteer community effort to** restore habitat <u>in</u> our own yards, one yard at a time. The concept of having pathways is to create close areas were the pollinators can go for nectar, which in <u>turn</u> supports the ecosystem.
- Page 3, under corrections, first bullet should read: The school board is looking to build community pride by being able to host home games and to give the students the technical aspects of the game. It
- Page 3, under corrections, last bullet should read: It should read: Member Shepcaro stated that as soon as the trail marking painting is done, she definitely wants to <a href="https://example.com/have">have</a> a trail gate at the Town Forest.
- Page 6, it should be noted that the engineer for 314 Brackett Road is **Jonathan Havey.**
- Page 6, 3<sup>rd</sup> sentence should read: Chair King recommended that the Commission does a sitewalk and in the meantime <u>file</u> the appeal.
  - December 2, 2019

The following correction was noted:

• Page 2, 4<sup>th</sup> paragraph, last sentence should read: It is not clear in the agreement between the Recreation Commission and the Rye Town Forest Citizen's Committee if any trees can be cut in the area.

Motion by Suzanne McFarland to approve the minutes of December 12<sup>th</sup> and December 2<sup>nd</sup> as amended. Seconded by Mike Garvan. Vote: 5-0-1 Abstained: Jaci Grote

## III. SITE WALK MINUTES

• December 16, 2019 – Site Walk

Motion by Susan Shepcaro to approve the site walk minutes of December 16<sup>th</sup> as presented. Seconded by Sally King. Vote: 4-0-2 Abstained: Jaci Grote and Suzanne McFarland

• December 17, 2019 – Public Hearing

Motion by Jaci Grote to approve the minutes of the public hearing of December 17<sup>th</sup> as presented. Seconded by Mike Garvan. All in favor.

• December 19, 2019 – Site Walk

Motion by Jeff Gardner to approve the site walk minutes of December 19<sup>th</sup> as presented. Seconded by Susan Shepcaro. Vote: 5-0-1 Abstained: Jaci Grote

• December 27, 2019 – Meeting

Motion by Jaci Grote to approve the meeting minutes of December 27<sup>th</sup> as presented. Seconded by Susan Shepcaro. Vote: 4-0-1 Abstained: Jeff Gardner and Suzanne McFarland

## IV. WETLANDS

A. 67 Harbor Road, Tax Map 092, Lot 005
 Owner: Judd and Cathy Gregg
 Corey Colwell – TF Moran Engineering
 Work with the 100' buffer

Corey Colwell, TF Moran Engineering, spoke to the Commission regarding the proposal for an exterior renovation project for the home located at 67 Harbor Road. The home is a two-story home from the front and a three-story home from the backside. The property is about 2.7 acres in size and is located entirely in the 100' tidal buffer zone. The back three quarters of the southwesterly side of the property is all tidal marsh. The entire uplands on the property are previously developed with building, pavement or lawn. This part of Harbor Road is private and runs through the property, serving a few houses in the back. The house currently sits about 34' from the highest observable tide line of the ocean and about 40' from the tidal marsh. The applicants are proposing to rebuild the existing first and second floor decks. There will be a semi-circle addition just to the first floor deck. An existing deck on the east side of the house is being proposed to be removed and replaced with a portico. This is being built in the same footprint as the deck. The only expansion would be the steps to the portico. A second floor deck would be constructed over the portico. That second floor deck does currently exist. A third improvement will be a screened porch to the southeast corner of the home. About half of the porch is an existing deck. The applicants are also proposing a pergola, which will be entirely over an existing concrete patio and would be 12' from the existing house. A generator and propane tank will be installed on concrete slabs and enclosed on three

sides. There would be a 6' fence around the tank and generator. The proposal also calls for a stonewall adjacent to the tidal marsh to create. This is being proposed to create a barrier between the uplands and the tidal marsh. The proposal also removes 2276sf of pavement, which is currently about 10' from the tidal marsh. The pavement is being replaced with grass. Another 3125sf of pavement is being removed and being replaced with crushed stone. The intent is to remove all pavement from the property. A total of about 6300sf of pavement is being removed. The pavement for the parking space, entrance to the garage and walkway is being removed with pervious pavers being put in its place.

Variances are needed for the improvements to Sections 301.8B, site renovations within the 100' wetland buffer; 203.3C, and site renovations within the front yard setback. If the variances are obtained, a State wetland permit from NH DES would also be required for the improvements.

Referring to the new generator and propane tank, Vice-Chair McFarland asked if this is elevated or on an anchored system, as it is being moved back closer to the marsh.

Mr. Colwell confirmed that it will be elevated and anchored to prevent water from getting under the generator.

Chair King asked why that spot was chosen for the generator, as it might not be the best spot environmentally.

Mr. Colwell replied that the current generator is about 30' from the ocean and is in plain view. The proposed location is behind the shed so it will be out of view. He noted that the proposed location is in compliance with setbacks. He also noted the shed is existing and there are no plans to make any changes to it.

Vice-Chair McFarland noted the new water resource maps show the location for the proposed stonewall as being a restoration priority area, as established by the Nature Conservancy and DES.

- Site Walk scheduled for Wednesday, January 15<sup>th</sup>, 4:00 p.m.
  - B. 2230 Ocean Blvd, Tax Map 053, Lot 066
    Owner: Joan and Harvey Bines
    Corey Colwell TF Moran Engineering
    Required planting plan for 2015 new construction

Corey Colwell, TF Moran, spoke to the Commission in regards to the landscaping plan for the property at 2230 Ocean Boulevard. A proposal for a new home was before the Commission in 2014 and part of the site improvement was landscaping. One of the conditions of approval was that if any changes were made to the landscaping the proposal had to come back before the Commission. He was at the Commission's previous meeting to present a plan that the members did not agree to. Further revisions have been made to the landscaping plan that was presented at last month's meeting. He reviewed those changes for the Commission.

The Commission agreed that the revisions are highly reasonable and the property owner can move forward with the proposal. The Commission also agreed that they would like to revisit the site to follow up once the work is complete.

The plan presented by Corey Colwell, for the Bines property at 2230 Ocean Blvd, was approved with an agreement that the Commission can follow up with a site walk by June 30, 2020.

C. 40 Brackett Road, Tax Map 022, Lot 090
 Owner: Eric Cummings and Cheryl Lloren
 Steve Riker – Ambit Engineering
 Replace septic system

## • Tabled to later in the meeting.

D. 1611 Ocean Blvd, Tax Map 013, Lot 027
 Landscaping – Building Department
 Matt Barton – Landscaper

## • Continued to the February 13<sup>th</sup> meeting.

E. 140 Harbor Road, Tax Map 9.2, Lot 17 Owner: Donald K. Laing Matt Silva – Profile Homes

Matt Silva, Profile Homes, spoke to the Commission about the proposal for 140 Harbor Road, which was previously reviewed by the Conservation Commission and approved by the Board of Adjustment. One of the conditions of approval for the home was based on the house being built strictly on pilings, which was based on the engineer's assumption that the ground condition would not support a foundation under the building. Since that time, a study by S.W. Cole Engineering has been completed that shows a cross based foundation could be put underneath the structure. The way the foundation has been designed for this location puts the slab above the water table and meets the FEMA regulations the application is required to meet. He spoke about the reasons for the foundation proposal; which include, structural support and dry space storage. It was noted that the existing home is very small and is essentially a fishing shack with a loft. The original plan involved expanding the structure. That plan was denied and a revised plan for a smaller home was approved with the existing structure being torn down. The new home will remain within the existing footprint, aside from adding a second story. The entire house square footage will be 953sf, which is approximately double the square footage of the existing structure because of the additional second floor. The property is a seasonal property and can only be used nine months out of the year. It was also noted that building pilings is a longer and more disruptive process to the marsh. With a foundation, the dig can be done with a mini excavator, which is smaller than the equipment needed for pilings. The proposed foundation is basically a crawl space (3'4" of space) and will not hold any utilities, as this is restricted by FEMA regulations in that location. The application to allow the foundation is scheduled to go before the Board of Adjustment at their next meeting in February. This is the only change from the approved plan that will be brought to the BOA.

The Commission did not feel a site walk was needed; however, members who would like to visit the site on their own may do so.

Motion by Jaci Grote to write a letter to the Board of Adjustment supporting the crawl space proposed by Profile Homes. No formal site walk is needed; however, Conservation Commission Members may visit the site on their own if they wish. Seconded by Mike Garvan. All in favor.

## Motion by Jaci Grote to take item H, under Other Business, out of posted agenda order. Seconded by Suzanne McFarland. All in favor.

• RCC rules for tree stands and blinds on conservation properties

Member Garvan explained there are a number of conservation properties that the Conservation Commission manage that allow hunting. Most of those properties have tree stands on them and his concern is that the Commission does not know who the owners are, as they do not have any kind of identification on them. If the tree stand was improperly installed or someone was to get hurt climbing the stand, the Commission would have no way of contacting the owner. He continued that he knows of one stand that has been in its location for years. It does not seem fair that this owner can leave this and have that section as their own little "private preserve". He continued that he has researched some rules regarding this issue from Southeast Land Trust, Fish and Game, and rules for Wildlife Management Areas through Fish and Game. He has submitted that information to the rest of the Commission. He proposes that there be a requirement that the owner of the stand have a tag on the stand that identifies them, along with contact information. This will give the Commission better management control. Additionally, in the Wildlife Management Areas, Fish and Game has a restriction that a stand cannot be up before August and has to be taken down by December 31st. He has spoken with a Rye hunter who thought this timeframe was reasonable. The intent of bringing this to the meeting is to hear everyone's thoughts, including the public, and to work on some wording that can be voted on at the next meeting.

The Commission agreed the identification tags would be helpful.

**Resident David Gaskell** noted that for New Hampshire State Property the law is that it can be put up August 1<sup>st</sup> but must be taken down by January 31<sup>st</sup>, according to Fish and Game's State Rules for State land.

It was noted that the land in Rye that allows hunting is town owned and the rule could be different from the State's. Member Garvan commented that the Commission would be happy to mirror the State rule. He is just proposing some sort of control.

Member Grote pointed out it is easier to mimic the State rule so people do not have a whole different set of rules to remember.

The Commission agreed. They also agreed that they were fine with using the same date as the State of January 31<sup>st</sup>.

Member Grote asked what the policy is going to be if someone has a tree stand and does not put their name on it or take it down.

Chair King suggested posting the stand with a note requesting contact information or leaving a copy of the rules. She explained the properties are town owned and are managed by the Conservation Commission. The Commission is just trying to come up with a plan that makes sense for corresponding with people. It is not meant to be more restrictive.

Mr. Gaskell stated that he feels it is a great idea to remove the tree stands by January 31<sup>st</sup>. The only problem is the fact that the Rye Airfield have a lot of stands that are owned by non-residents who will not know the rules.

Member Garvan stated the when the Commission decides what is going to be put in place, a member of the Commission will probably check the sites and tag the stands stating that they are in violation of Rye rules.

A member of the public commented that she thought a stand could not be put on private property without requesting permission from the property owner.

Chair King clarified that they are speaking about public land.

Member Garvan noted that one of the questions in the Fish and Game pamphlet is whether permission is needed from the landowner in order to put up a tree stand. Permission is only needed if the tree stand is going to cause any damage to the tree. He saw nothing about identification, except Southeast Land Trust requires identification on temporary stands. None of the regulations impact private owners from having stands on their own property.

It was noted by the Commission that the only rules that are being proposed is identification on the tree stands and pulling the stand by January 31<sup>st</sup> with it not being up before August 1<sup>st</sup>.

Mr. Gaskell spoke in support of the proposed rules.

There was some discussion on posting the rules at the entrance to the properties.

40 Brackett Road, Tax Map 022, Lot 090
 Owner: Eric Cummings and Cheryl Lloren
 Steve Riker – Ambit Engineering
 Replace septic system

<u>Note</u>: *Mr. Riker was not available for the meeting; however, the Commission reviewed and discussed the project with his permission.* 

The Commission reviewed the proposal submitted by Steve Riker, Ambit Engineering, for the replacement of the septic system for the property located at 40 Brackett Road. A portion of the field is within the 100' buffer and the other half is out of the buffer. There is also a proposal for a porch; however, this is out of the buffer. A Shoreland Permit Application will be submitted for the impacts outside the 100' buffer and the 100' buffer associated with the saltmarsh located on the other side of Brackett Road with Berry's Brook. The new septic is located in the only place it can be placed on the lot. Test pit #1 had 4" to ledge, so that location was not feasible. Test pit #2 was suitable and that is where the new septic was designed. This location is as far away from the freshwater wetlands "behind" the house, as possible. The septic plan has been reviewed and approved by the Town and DES, subject to the Wetland and Shoreland Application.

• Site Walk scheduled for Wednesday, January 15<sup>th</sup>, 3:15 p.m.

## V. PENDING SITE WALK

## A. 250 Locke Road

Member Shepcaro noted that no planting has been done at the property. There is also a raingarden dug out on the front with nothing planted with a pipe coming up. Recently, a bunch of sand was put into the raingarden. The property owners got their certificate of occupancy conditioned upon plantings. The Building Inspector will need to send a notice of violation and the Commission can follow up with a specific date for the work to be completed.

Member Shepcaro agreed to discuss this with the Building Inspector.

## **B.** 4 Winslow Way – building department

Member Grote and Member Garvan will take a look at the site.

## **C. 16 Richard Road** – plantings – written agreement

Vice-Chair McFarland noted that the owners were not able to get the planting done over the fall; however, they agreed to a written agreement with money going into escrow for the work.

It was noted that an agreement has not yet been received. Vice-Chair McFarland and Chair King will follow up with the property owner.

## VI. OTHER BUSINESS

## **A.** Discussion regarding workshop feedback and next steps

NH Coastal Conservation Plan (Land Conservation Priorities for the Protection of Coastal Water Resource) – The Commission held a public forum with Amanda Stone, UNH Extension, educating the community with regards to land conservation that would provide the highest level of protection to water resources.

Vice-Chair McFarland noted the grant money for this project runs out in June. Amanda Stone has suggested a few projects for the Commission as next steps:

- Natural Resource Inventory (NRI) This would put the Commission in a better position to receive grants in the future. A subcommittee may be a good way to approach the work for this project.
- 2) Conservation Priorities Checklist This goes along with the NRI, once it is established.
- Conservation Overlay Districts Julie LaBranche from Rockingham Planning Commission could attend a Conservation Commission meeting to give them more information on this concept.
- 4) Public Outreach Program There was a great response from the residents who attended the workshop. It seems that there is an interest in more education on this topic.

The Commission discussed the ideas that they would be interested in working on. Amanda Stone is available February  $10^{th}$  to meet with members of the Commission who are interested in speaking further

about the projects. Vice-Chair McFarland will follow up with the members on an exact time for the meeting with Ms. Stone.

#### **B.** Discussion members' time

The members discussed the best use of their time on the Commission and how they can organize projects and meetings, as a voluntary board.

- **C.** Signature Lane Raynes Woods *Taken off public agenda*.
- **D.** 1090 Washington Road Donovan *Taken off public agenda*.
- **E.** Mrs. White signs

Chair King noted the conservation land near the Whites' home is going to be posted "no trespassing". Mimi White has concerns about the cutting of trees and the building of make shift structures on the parcel. The parameter of the property will also be posted "Conservation Easement". A letter to the abutters notifying them have been sent out.

## **F.** Cell towers

At the Recreation Commission's recent monthly meeting, the chair of the Telecommunications Committee met with them to discuss the proposal to add the recreation area to the Wireless Overlay District, so it could be considered as a site for a possible cell tower location. The Recreation Commission unanimously voted against the proposal. It was said that if the Recreation Commission did not support this, the warrant article to add the land into the Wireless Overlay District would be withdrawn from the Town Ballot. At this time, it has not been withdrawn but has been tabled and will be discussed at the Planning Board's next meeting on January 14<sup>th</sup>.

Chair King stated that the Conservation Commission was asked to support that location. She does not think it is appropriate for the Commission to be asked for that support. The five acres that is being considered came off the acreage that was Town Forest land. Part of the agreement, when Recreation received the land, was that the Conservation Commission was still involved if anything was to happen with that parcel.

Member Shepcaro noted that it also says that trees cannot be cut without permission from the Board of Selectmen and a town vote. The Conservation Commission has a say as well.

Chair King stated it puts the Commission in a strange position. The residents are not really interested in that land as a site. She does not think this is the Conservation Commission's battle to fight.

Alternate Oliver stated that Selectperson Roman was at a meeting to speak about this with the Commission. Alternate Oliver asked how it was left with her, as far as the Commission's position.

Member Grote explained that that Commission said that because the cell tower location was not going to be on conservation land, but was going to affect their land, they would rather it not happen but were going to wait for the Recreation Commission's response.

Member Shepcaro stated the concern for her is there is a wetland crossing and the Awcomin' Marsh, which has a 100' buffer. She is not sure if they would be able to be out of the 100'. Also, there are wetlands where they would have to cross. She pointed out that there is not enough land to get a fall zone that is not in conservation.

Alternate Truslow commented that one of the reasons Selectperson Roman wanted direction was because if it was going to be in the Overlay District, it would allow the tower to be in that district but also disallow it to be in other places. It was a way to try to prevent cell towers from being put just anywhere.

Chair King stated that she understands but she also thinks it is a false panic. Part of the interest to the Town, is they would like the money to come to the Town and they would like some control, which makes sense. However, they can't threaten everyone that if it doesn't happen in one area it will be in another. She pointed out that wireless companies can force coverage, but as long as they are moving forward as a town, she does not understand the panic.

Alternate Oliver asked if the Conservation Commission should weigh-in publicly. She commented that the Commission wants to control their message and thinking.

Member Grote stated that a cell tower did go on conservation land. The Conservation Commission was supposed to get the proceeds from that tower after five years and they have never received the proceeds. It makes someone hesitant to jump in to help again.

Vice-Chair McFarland noted that the five acres at the rec area in the high priority protection area.

There was some discussion on whether the Commission should make a statement about this proposal. It was agreed that sending something in writing from the Conservation Commission to the Board of Selectmen and the Planning Board would be appropriate.

Chair King stated that she does not feel like the Town involved the Conservation Commission in the process and then they were asked to "come on board".

Alternate Oliver asked if there is any conservation land that would be suitable.

Member Grote stated that she asked if there was any land, not in the wetland protection area, and they said "no". She noted there is a specific area of coverage that they are trying to cover. Unfortunately, that area is all around property that Conservation is trying to protect. The only thing that made sense was the corner of the cemetery. The corner of the rec area was the best and the cemetery left a little bit of area uncovered; however, it was better than nothing.

Chair King stated that she would be very comfortable saying that the Conservation Commission does not support the Rye Recreation site.

Member Garvan stated that he would like to have reasons. Some of the ones he heard; visual, wetlands crossing, the fall zone and cutting of trees in the Town Forest.

Member Shepcaro noted that the wireless compound is 50x50. There is also a road to the compound that is 12' wide and any tall trees around the site have to be cut. She does not think rec has enough land to cover that space, plus there is the marsh and the 100' buffer.

Vice-Chair McFarland reiterated that the parcel is all Protection and Restoration Priority Land.

Member Garvan commented that the Conservation Commission is not necessarily against the cell tower being close to the Town Forest. The cemetery proposal might also impact the forest and trees may be lost; however, there is no wetland crossing and is not in a prime wetland protection area.

The Commission agreed a letter with their thoughts and reasons for not supporting the recreation site should be written. Member Grote agreed to write the letter for the Commission.

**G.** Pollinator program February 20, 2020

Rye Conservation Commission has been asked to host a Pollinator program; Pollinator Planting and Gardening Tips. The suggested date is Thursday, February 20, 2020 from 7:00 to 8:30 p.m. The topics will cover native plants that attract pollinators, sustainable nature gardening tips, and ways to transition unused lawn into gardens for all habitants to enjoy.

It was suggested to do this event in conjunction with the Rye Garden Club. Member Reed will reach out to them and find a place to hold the program.

It was also noted that a presentation is being given at the Rye Public Library by a Black Bear rehabilitator on January 15<sup>th</sup> at 6:30 p.m.

**H.** RCC rules for tree stands and blinds on conservation properties *Addressed earlier in the meeting.* 

## VII. CORRESPONDENCE

• Chair King stated that she received a letter from Judy Scott abutter to the Driftwood property at 1215 Ocean Boulevard. Ms. Scott and other abutters are objecting to the proposal to use Astro Turf for the redevelopment project at that location. Chair King commented that she remembers this being mentioned on the site walk, but does not remember how much turf is proposed. She suggests that they try to find out more information and write a letter to the Planning Board stating that they do not support the artificial turf.

Member Reed agreed to get more information from Planning/Zoning Administrator Kim Reed and follow up with a letter to the Planning Board.

## **A.** Beach Commission planting concerns

A letter from the Beach Commission was sent to the Commission in September of last year regarding the beach grass that is being planted on the beach. The Beach Committee sees it as excluding other usage of the beach. They think it is being intentionally placed in rows and is not natural. The grass is being wiped away anyways, so it is not doing anything particularly productive. The Beach Committee wrote a follow up letter to the Commission stating that they are sending something to the Selectmen. They have not

heard back from the DES on this issue. The Beach Committee's intent is to have the Town come up with a comprehensive beach planting plan to ensure residents are not negatively affecting public space beach with random plantings.

• A letter was received from Logan Kelley who is a star boy scout asking if he could donate his time to a conservation project in order to advance to life scout.

Member Shepcaro agreed to follow up with Logan and give him a couple of options for work.

• Correspondence was received from Attorney Tim Phoenix to Planning/Zoning Administrator Kim Reed asking for a continuance to the February meeting for the application of Marc Grondahl, for property located at 312 Brackett Road, which was scheduled to go before the Board of Adjustment on January 8<sup>th</sup>. The continuance was requested to allow the applicant sufficient time to respond to concerns raised by the Conservation Commission. It was also noted that the Board of Adjustment intended to consider whether additional relief is needed to RZO 301.8(b)(5) for the proposed driveway.

Member Garvan stated that he was at the Zoning Board meeting and there was discussion on whether a special exception was needed for the tree cutting. The applicant is aware that he needs one for constructing a driveway. The ZBA determined that a special exception was needed for cutting trees, along with the driveway.

- Tracey Degnan, Rockingham Planning Commission, completed conservation easement monitoring for the Goss Farm on December 31<sup>st</sup>.
- Southeast Land Trust will be sending a letter to the owners of the "Liam" property (now Ward) regarding recent activity with driving through wetlands. It seemed to be recreational use.
- Member Garvan noted he monitored Seavey Acres on December 20<sup>th</sup> and his report was submitted December 31<sup>st</sup>.
  - **B.** January 6, 2020 335 Washington Road, Tax Map 16, Lot 122, NHDES letter, final monitoring

A letter was received from DES confirming that the property owner of 335 Washington Road has completed DES's request to fill in the pond and restore the land.

## VIII. BILLS

- Michael Donovan \$770.00
- James Verra surveying James Raynes Conservation Woods \$5,879.61
- Karen Oliver 314 Brackett Road \$166.09

Motion by Jeff Gardner to approve the payments as presented. Seconded by Jaci Grote. All in favor.

## IX. NON-PUBLIC SESSION (1) per RSA 91-A:3, II (e) Legal

At 9:48 p.m., Jaci Grote made a motion to go into Non-Public Session per RSA 91-A:3, II (e) Legal. Seconded by Suzanne McFarland.

Vote: Karen Oliver – Yes, Danna Truslow – Yes, Heather Reed – Yes, Susan Shepcaro – Yes, Sally King – Yes, Suzanne Shepcaro – Yes, Mike Garvan – Yes, Jeff Gardner – Yes

At 10:13 p.m., the Commission came out of Non-Public Session.

Motion by Jaci Grote to seal the minutes of the Non-Public Session just concluded. Seconded by Suzanne McFarland. All in favor.

## **ADJOURNMENT**

Motion by Jaci Grote to adjourn at 10:14 p.m. Seconded by Suzanne McFarland. All in favor.

Respectfully Submitted, Dyana F. Ledger