

COMMONWEALTH OF MASSACHUSETTS

NORFOLK, ss.

Superior Court C.A. No.
2008-00174

Town of Wellesley v. Department of Environmental Protection

Consolidated with:

Town of Medfield et al. v. DEP	Norfolk Superior Court Dkt. No. NOCV2008-00198
Millis by and through its Water Department v. DEP	Norfolk Superior Court Dkt. No. NOCV2008-00205
City of Brockton v. DEP	Plymouth Superior Court Dkt. No. CV2008-00163
Town of Duxbury v. DEP	Plymouth Superior Court Dkt. No. CV2008-00138B
Town of Mattapoisett v. DEP	Plymouth Superior Court Dkt. No. PLCV2008-00139
Fairhaven by and through its Water Department v. DEP	Bristol Superior Court Dkt. No. BRCV2008-00166
Town of Hamilton v. DEP	Essex Superior Court Dkt. No. ESCV2008-0191C
Lynn Water & Sewer Commission v. DEP	Essex Superior Court Dkt. No. ESCV2008-00208
Town of Manchester-By-The-Sea, by and through its Water Department v. DEP	Essex Superior Court Dkt. No. ESCV2008-00214
Town of Harwich v. DEP	Barnstable Superior Court Dkt. No. BACV2008-00089
Mashpee Water District v. DEP	Barnstable Superior Court Dkt. No. BACV2008-00082
Sandwich Water District v. DEP	Barnstable Superior Court Dkt. No. BACV2008-00081
North Reading by and through its Water Department v. DEP	Middlesex Superior Court Dkt. No. MICV2008-00491

**AMICUS MEMORANDUM OF LAW ON PLAINTIFFS' CONSOLIDATED
MOTIONS FOR PARTIAL SUMMARY JUDGMENT**

Adequate instream flow in rivers and streams is critical to sustaining essential ecological functions, providing aquatic and riparian habitat, and meeting human health

and recreational uses. As the United States Supreme Court has explained there is an inextricable link between water *quantity* and *quality*: “water quantity is closely related to water quality; a sufficient lowering of the water quantity in a body of water could destroy all of its designated uses, be it for drinking water, recreation, navigation or, as here, as a fishery.” *PUD No. 1 of Jefferson County v. Washington Dep’t. of Ecology*, 511 U.S. 700, 719 (1994).

Massachusetts environmental and conservation organizations concerned about the impacts to fisheries, habitat, species diversity and water quality from decreasing streamflows and the overall declining health of water resources throughout the Commonwealth submit this amicus memorandum on the issue of whether the Department of Environmental Protection (DEP) has the authority to prescribe conservation conditions in a renewal registration statement (renewal registration) to effectuate the purposes of the Water Management Act, G.L. c. 21G, § 1 *et seq.* (WMA). These environmental non-profits and their members value and work to protect the Commonwealth’s rivers and streams for their scenic beauty, wildlife, avian, wetland and aquatic habitat, fisheries and recreational opportunities. Many of their members own real property abutting rivers and streams. Five organizations, Mass Audubon, The Nature Conservancy, the Ipswich River and Jones River Watershed Associations, and the Merrimack River Watershed Council also own property along the banks of rivers and streams in the Commonwealth.

Introduction

Today, one of the “biggest challenges” facing Massachusetts “is maintaining sufficient quantities of streamflow so as to sustain ecological and anthropogenic demands.” *Massachusetts Water Policy* (Executive Office for Environmental Affairs

2004) at p. 6, attached hereto as Addendum A. River basins throughout the state are stressed and many rivers and tributaries experience extreme low flow conditions, or dry up, in the summertime when water demand increases and flows are already naturally low.¹ The Massachusetts Water Resources Commission (WRC) defines a stressed basin as one in which “the quantity of streamflow has been significantly reduced, or the quality of the streamflow is degraded, or the key habitat factors are impaired.”² *Stressed Basins in Massachusetts* (2001) at p. 2, attached hereto as Addendum B (selected pages). As noted in the *Massachusetts Water Conservation Standards* (2006) (Conservation Standards) at p. 3, attached hereto as Addendum C (selected pages), which establish statewide standards and recommendations for conservation, “[p]lacing streams under chronic unnatural low-flow conditions can cause substantial harm to aquatic and other water-dependent organisms and habitats, and ultimately to our economy and quality of life through loss of scenic, recreation, and property values.” Many public water suppliers are also finding it increasingly difficult to meet essential water supply needs for public health and safety.

Ground and surface water are hydrologically connected in Massachusetts. The Special Legislative Commission, which issued the report upon which the Water Management Act (WMA) is based, in 1983 wrote that “[T]he basic hydrological fact of groundwater and surface water interconnection is now well understood, and must be the

¹ Water use increases dramatically in the summer months, primarily due to lawn and landscape irrigation. The United States Environmental Protection Agency estimates that about one-third of all water used by large home households is used outdoors. The average lawn in the United States receives the equivalent of 145 days of indoor use by a single person per year. *Water, Water Everywhere: Dare I Drink a Drop ?*, New England Public Policy Center at the Federal Reserve Bank of Boston (Tannenwald and Turner 2005) (Federal Reserve Report) at p. 7, attached hereto as Addendum D.

² The Massachusetts Flow Stressed Basin map is attached hereto as Addendum B. The Stressed Basins’ Report and map are also available on line at: http://www.mass.gov/Eoeea/docs/eea/wrc/stressed_basins.pdf

centerpiece of all water management policy.” *Report of the Special Commission Established to Make an Investigation and Study Relative to Determining the Adequacy of the Water Supply of the Commonwealth*, Sen. Rep. 1826 (January 27, 1983) at p. 17 (Special Commission Report) (attached to City of Lynn’s Statement of Undisputed Facts in Support of Summary Judgment). As the Special Commission explained,

Groundwater makes a critical contribution to the surface water system, storing water during wet periods, and slowly releasing it during dry periods to maintain stream flows and reservoir levels. Thus efficient use of the Commonwealth’s water resources requires conjunctive management of ground and surface water.

Id. at 4, 6.

Withdrawals for public water supply from groundwater wells located near surface water bodies deplete the surface water in two ways: by capturing water that would otherwise flow into the water body and by “inducing infiltration,” or drawing water from the water body into the well. *See, e.g., Precipitation-Runoff Model for Analysis of the Effects of Water Withdrawals on Streamflow, Ipswich River Basin, Massachusetts*, United States Geological Survey (2000) at p. 40, attached hereto as Addendum E.³ Reservoirs for public water supply also adversely impact streamflow levels by diverting and impounding water that would otherwise flow downstream. *See e.g.* Postel and Richter,

³ Induced infiltration is the water that is depleted from surface water by the pumping of a well. It not only reduces baseflow, but it actually dries out the stream when the water table falls below the streambed. Baseflow is the water flowing into the river from groundwater, supplying the flow not provided by direct precipitation, snowmelt or runoff.

The relationship between withdrawals and streamflow depletion was already fairly well understood in 1983:

[E]xcessive withdrawals can lead to the depletion of groundwater, while replenishment of the groundwater from rainfall and percolation through the soil takes considerable time. Thus excessive withdrawals can outstrip supply and outpace the recharge process, leading to exhaustion of groundwater sources, reduction of interconnected surface water sources and, in coastal regions, to salt water intrusion.

Special Commission Report, *supra*, at p. 12.

Rivers for Life; Managing Water for People and Nature, (2003) at p. 14, attached as Addendum F.

Recognizing this interconnection between ground and surface water and the importance of managing them holistically, section 3 of the WMA gives the DEP broad authority to promulgate “such regulations as it deems necessary to carry out the purposes of this chapter, establishing a mechanism for managing ground and surface water in the commonwealth as a single hydrological system and ensuring, where necessary, a balance among competing water withdrawals and uses.” G.L. 21G, § 3 (emphasis added). The WMA creates the framework for managing the state’s water resources and sets as goals protecting the natural water environment and balancing competing demands on the finite supply of water. WMA regulations promulgated by DEP must “implement the principles, policies and guidelines established by the [water resources] commission . . .” G.L. c. 21G, § 3.

Through the adoption of the WMA, the legislature changed the common law of absolute ownership of groundwater and it delegated to DEP sole authority to allocate the Commonwealth’s waters among competing uses. Those water uses over 100,000 gallons per day in existence prior to 1985 were required to register their use. Under common law, these uses were subject to the “reasonable use doctrine,” which ensured that the owner’s use did not unreasonably impinge on the rights of other landowners, including riparian owners. Similarly, registrations are subject to continued oversight by DEP: the registration system does not grant a blanket “grandfathering” of these withdrawals.

The Water Resources Commission (WRC), in turn, is charged with adopting principles, policies and guidelines necessary for “the effective planning and management

of water use and conservation in the commonwealth and for the administration of this chapter as necessary and proper to ensure an adequate volume and quality of water for all citizens of the commonwealth, both present and future.” *Id.* WRC policies and guidelines adopted pursuant to this section must protect the natural water environment, further the comprehensive and systematic planning and management of water withdrawals and use, enable economic growth, and increase the social and economic well being and safety of citizens. G.L. c. 21G, § 3.

The Plaintiffs assert that as a legal matter DEP has no authority to prescribe conditions for registered withdrawals regardless of their reasonableness or whether they are designed to carry out the WRC’s policies and principles. Their contention that water suppliers with registered volumes are free to use those volumes in any way they choose unfettered by reasonable conservation conditions is at stark odds with state water policy, the principles and policies adopted by the WRC pursuant to section 3 of the WMA, the WMA itself, and its implementing regulations as promulgated by DEP. This Court should rule that DEP acted well within its authority in prescribing basic conservation conditions in the renewal registrations.⁴ Factual issues raised by Plaintiffs concerning the conditions as applied to them in individual registration renewals should be remanded to DEP for adjudicatory hearings.

ARGUMENT

1. DEP’s Conditions in the Renewal Registrations Implement Vital State Water Conservation Policies and Principles.

⁴ Amici note for the Court that water registrations are for a term of ten years and the registrations under review in this appeal will not be reviewable in the ordinary course of events until 2018.

The 2004 Water Policy recognizes the enormous challenge of maintaining sufficient stream flow for both human demand and ecological requirements and therefore declares that “[t]he impacts of insufficient water quantity behooves us to do our utmost to use water indoors and outdoors with maximum efficiency.” *Id.* at p. 6. “Addressing [water] quantity challenges requires . . . conservation efforts . . . Better use pattern will help minimize the need to develop new sources of water supply.” *Id.* (Emphasis added).

Acting pursuant to its authority under the WMA, the WRC in conjunction with the Executive Office for Environmental Affairs adopted updated *Massachusetts Water Conservation Standards* in 2006 (Conservation Standards).

The Water Policy identified revising the Conservation Standards “as a crucial step in moving forward with water resources planning to sustain the economic and environmental value of our water resources.” Conservation Standards at p. 2; *see also*, Water Policy at p. 10. The Conservation Standards reflect Massachusetts’ obligation to: 1) preserve the state’s water resources “as part of the public trust; 2) sustain current and future water needs; 3) protect aquatic ecosystems and minimize water supply impacts; and 4) provide financial savings in the cost of water.” *Id.* at 3. The Conservation Standards are explicitly intended to be used by DEP in its WMA program implementation. Conservation Standards at 5. They are also intended to be adopted by all water suppliers and users. *Id.* at p. 6.

The Conservation Standards require public water suppliers to “meet or demonstrate steady progress towards meeting 10% UAW [(unaccounted for water)] as soon as practicable . . .” *Id.* at p. 11. This water, which is “lost in the system,” is an important measure of system efficiency. The Conservation Standards also set a

residential use standard of 65 gallons per capita per day (gpcd) to be met “as soon as practicable.” *Id.* at p. 18. Because over 60% of all public water use is residential, “any improvements in residential water efficiency will result in significant water savings.” *Id.* The Conservation Standards also reflect the WRC’s 2002 policy that in the hierarchy of water uses, water for lawns and landscapes (nonessential outdoor use) comes last -- after uses for public health, safety and the environment. *Id.* at p. 25. Since water use peaks in the summer as outdoor water use increases, primarily for irrigation purposes, the Conservation Standards also require implementation of seasonal demand management plans, with outdoor water use restrictions tied to environmental indicators, such as streamflow. *Id.* at 25 and 15.

These are precisely the types of conditions that DEP included when it issued the renewal registrations to Plaintiffs. DEP was extraordinarily generous in prescribing conditions: suppliers are given ten years, or until registration renewal at the end of 2017 to meet the 10% UAW and 65 residential gpcd standards, although they must develop and implement a compliance plan for meeting these standards by the end of 2012.⁵ DEP’s seasonal demand management plan only requires registrants to restrict watering from May 1 to September 30 between the hours of 9:00 a.m and 5:00 p.m. when evapotranspiration is highest upon declaration of a Drought Advisory⁶ or higher by the State Drought Task Force. If the community has failed to meet the 65 residential gpcd performance standard the previous year, it must additionally limit lawn watering to one

⁵ A number of environmental groups have moved to intervene in the administrative appeals of the registration renewal conditions on the grounds that the conditions prescribed by DEP are not in fact protective enough.

⁶ Environmental conditions will already be quite serious because at a Drought Advisory groundwater levels must be below normal for two consecutive months and streamflow levels must be below normal for at least two out of three consecutive months. See, <http://www.mass.gov/Eoeea/docs/eea/wrc/droughtplan.pdf>

day a week when a Drought Advisory or higher is declared. A copy of DEP's seasonal demand management plan is attached as Addendum G. All of the renewal registration conditions challenged by the Plaintiffs are intended directly to reduce nonessential water use and to improve system efficiency in accordance with the state's Water Policy and the Conservation Standards.

II. DEP Has the Legal Authority to Prescribe Conservation Conditions in Renewal Registrations.

The Plaintiffs assert that registrations are merely a "record-keeping system" and nothing more. *See, e.g.*, Town of Millis Memorandum in Support of Partial Summary Judgment at 11. Some Plaintiffs concede that the regulations at 310 CMR 36.08 allow DEP to prescribe conditions on registered withdrawals, but argue that DEP's regulations exceed its statutory authority. *See e.g.* Town of Medfield's Memorandum in Support of Partial Summary Judgment at 16. Neither of these arguments is persuasive based on the language of the WMA and DEP's broad authority to promulgate regulations pursuant to the WMA. Nothing in the legislative history supports Plaintiffs' erroneous interpretation.

Under the WMA, registered volumes (based on existing withdrawals accepted by DEP)⁷ are given priority with respect to available water from a water source over new withdrawals in excess of 100,000 gpd, which require a permit from DEP. If the proposed permitted withdrawal alone, or in combination with other authorized withdrawals, exceeds the safe yield of the "water source" (defined to include a river basin in section 2

⁷ Existing withdrawals are defined as "the average volume of water withdrawn from a particular water source during the five years prior to January, [1986]." These withdrawals were required to be registered with DEP; new withdrawals above 100,000 gallons per day require a permit from DEP. *See*, G.L. c. 21G, §§ 2, 5, 7.

of the WMA) DEP is prohibited from issuing a permit.⁸ G.L. c. 21G, § 11; 310 CMR 36.30(2)(a); 310 CMR 36.28(1)(j) and 36.30(2). Thus, the legislature established an allocation framework which distinguishes between existing withdrawals and new withdrawals.⁹ But it does not follow that the legislature intended that registrations, which must be renewed every ten years, cannot be reasonably conditioned to carry out the purposes of the WMA. Since 85 percent of the total withdrawals in the state are registered and only 15 percent are permitted,¹⁰ adoption of the interpretation urged by Plaintiffs would render achievement of the fundamental goals of the WMA impossible.

The WMA was passed in response to water shortages.¹¹ The Special Commission concluded that the common law was no longer adequate for the protection and

⁸ “The concept of safe yield is fundamental to the proper management of a water source, taking into account the natural variability of streamflow, and serves as the principal regulatory basis for determining the scope of permitted water withdrawals in a water source.” 2005 Preface to “Revisions to the Massachusetts Water Resources Management Program (310 CMR 36.00)” at Addendum H attached hereto. Safe yield is defined as “the maximum dependable withdrawals that can be made continuously from a water source, including ground or surface water, during a period of years in which the probable driest period or periods of greatest water deficiency is likely to occur, provided, however, that such dependability is relative and is a function of storage and drought probability.” G.L. c. 21G, § 2. Safe yield sets a finite limit on the amount of water that can be withdrawn from a basin while protecting the interests in the WMA..

Under section 5 of the WMA, DEP is authorized to adopt procedures for recognizing as existing withdrawals volumes in excess of the average annual water withdrawn in the five years preceding passage of the WMA, but it may not do so if “such volumes of water together exceed the safe yield of the water source from which the withdrawals are being made.”

⁹ DEP is now under a court order to develop a scientifically-sound method for determining safe yield and to apply it in the Ipswich River basin. *Town of Hamilton v. DEP*, Memorandum of Decision and Order on Cross Motions for Judgment on the Pleadings, Essex Superior Court Dkt. No. 06-745 (Fahey, J.). If registrations are inviolate, safe yield requirements will curtail DEP’s ability to permit new withdrawals.

¹⁰ DEP reports that withdrawals totaling 1128 million gallons per day (mgd) were registered and it has issued WMA permits for 201mgd. See, DEP website at: <http://www.mass.gov/dep/water/priorities/09swgw.doc>.

¹¹ The Special Commission at p. 4 reported that the continued adequacy of the Commonwealth’s water supplies can no longer be taken for granted. The Massachusetts Water Supply Policy Statement identified 155 communities as facing probable deficits by 1990. 76 communities suffered critical or

management of water resources and that “a comprehensive framework for water resource management” through new legislation was necessary. Special Commission Report at p.

7. The Commission also recognized the vital role of water conservation in this new scheme:

One obvious strategy to overcome actual shortages of water and reduce the threat of future shortages is to introduce methods of water conservation to manage demand and consumption of existing and new consumers at all times, rather than just when supplies are short . . . In any comprehensive water management program, conservation in all sectors – residential, municipal, commercial, industrial and agricultural – must be recognized as a principal method of meeting current and future water supply needs.

Id. at p. 39.¹² Nothing in the Special Commission’s report supports the assertion that the legislature meant to exclude 85 percent of all withdrawals from meaningful conservation conditions.

Plaintiffs rely on the last sentence in G.L. c. 21G, § 5 to argue that DEP has no legal authority to impose reasonable conditions implementing state water policy and the WRC’s Conservation Standards on renewal registrations. However, they ignore the registration scheme as a whole in §§ 5 and 6 and the clear mandates throughout these sections that DEP adopt registration forms, criteria, and procedures through

potential water shortages at the height of the 1981 drought, and 46 communities remain on the list today, after nearly a year of bountiful rainfall.

¹² The Special Commission, *id.* at p. 4, reported:

[T]he continued adequacy of the Commonwealth’s water supplies can no longer be taken for granted. The Massachusetts Water Supply Policy Statement identified 155 communities as facing probable deficits by 1990. 76 communities suffered critical or potential water shortages at the height of the 1981 drought, and 46 communities remain on the list today, after nearly a year of bountiful rainfall.

regulations.¹³ It is a basic tenet of statutory construction that courts will construe the scheme as a harmonious whole. *See, e.g., Flemings v. Contributory Retirement Appeal Board*, 431 Mass. 374, 375-76 (2000) (“If a sensible construction is available, we shall not construe a statute to make a nullity of pertinent provisions or to produce absurd results”) (citations omitted); *Ruzicka v. Commissioner of the Department of Employment and Training*, 36 Mass. App. Ct. 215, 219 (1994) (court should “adopt an interpretation of the statute that harmonizes the statutory provisions”).

Section 5’s provision that filing a renewal registration statement entitles the registrant to “continue existing withdrawals specified in the registration statement for a period of ten years” does not require this court to conclude that no sensible parameters can be drawn around the withdrawal. Notably, DEP did not reduce the registered volumes in the renewal registrations, which provide at p. 1: “The Registrant is hereby authorized to withdraw up to the registered volume of water . . .” Rather, the agency circumscribed the uses of that water through conditions aimed at reducing nonessential outdoor use, primarily lawn watering, during the summer months when streamflow is already low (and especially during drought conditions), as well as through efficient distribution system operation. Although many communities today are not now using their full registered volumes, under the renewal registrations issued by DEP, they are still free to withdraw their entire registered volumes for the next ten years to accommodate new residential, and commercial and industrial growth.

¹³ The Special Commission concludes at p. 8 that “[e]ssential features of the required regulations will be criteria, standards and procedures for registration of existing users and for issuing permits to new users.” These requirements for registrations go well beyond mere record-keeping responsibility on DEP’s part. *See* 310 CMR 36.06-36.10.

Significantly, section 6 explicitly provides that “[t]he regulations issued by the department shall specify the form and required contents of a registration statement . . .” G.L. c. 21G, § 6. “At a minimum, such regulations shall specify that the registration statement must contain . . . conservation measures instituted, or to be instituted, by the registrant . . .” *Id.* A renewal is a “registration statement.” The specific reference in section 6 to conservation measures, also qualified by the inclusive words “at a minimum” further supports DEP’s authority to prescribe such conditions. Moreover, the language in this section does not limit conservation measures to only those proposed by a registrant as some Plaintiffs suggest. Under the plain language of §§ 5 and 6, DEP is not prohibited from conditioning registrations to achieve the goals of the WMA.

Nor are DEP’s regulations at 310 CMR 36.08 contrary to the plain language of the WMA as Plaintiffs assert. Courts “grant substantial deference to an agency’s interpretation of a statute.” *Citizens for Responsible Environmental Management v. Attleboro Mall, Inc.*, 400 Mass. 658, 670 (1987). Here, where the legislature in section 3 of the WMA has given the agency a broad grant of authority to promulgate “such regulations as it deems necessary to carry out the purposes of this chapter, establishing a mechanism for managing ground and surface water in the commonwealth as a single hydrological system and ensuring, where necessary, a balance among competing water withdrawals and uses[,]” deference should be given to DEP’s interpretation of the statute through its regulations. This is especially true since all DEP regulations must “conform to, and implement, the principles, policies and guidelines established by the [water resources] commission” pursuant to § 3 of the WMA. G.L. c.21G, § 3. In its reasons accompanying the renewal registrations, DEP explains that water conservation measures

are being included in the registrations “[t]o better achieve a balance between competing water withdrawals and uses mandated by the Act, to protect the natural environment, and to provide continued and sustainable economic growth in the Commonwealth . . .” DEP has acted lawfully to achieve these ends.

DEP’s regulations specifically provide that “[t]he registrant shall comply at all times with any requirements and conditions imposed by the Department, M.G.L. c. 21G and 310 CMR 36.00.” 310 CMR 36.08(1)(emphasis added). Pursuant to subsection 3 of 310 CMR 36.08, DEP “may impose, at a minimum,” the conditions listed “upon the person submitting” a registration or renewal registration statement.¹⁴ *Id.* (emphasis added). While conservation conditions are not explicitly listed in 36.08(3), the inclusive phrase “at a minimum” clearly allows additional types of conditions to be set by DEP. Registrants seeking renewal of their registration statements are required to “file a renewal registration request as specified in 310 CMR 36.10.” 310 CMR 36.08(7).

In sum, DEP’s ability to impose conservation conditions in these circumstances accords with the clear legislative intent and the requirements of the WMA and its regulatory scheme. *See, Polaroid Corp. v. Commissioner of Revenue*, 393 Mass 490, 497 (1984) (“words of a statute must be construed in association with other statutory language and the general statutory plan”); *Chelmsford Trailer Park v. Town of Chelmsford*, 393 Mass. 186, 192 (1984) (“individual statutory provisions related to the same general area must be read ‘as a whole . . . to the end that, as far as possible, the [entire legislative program] will constitute a consistent and harmonious whole.’” *Jones*

¹⁴ In addition under 310 CMR 36.08(4), the registrant must provide “any information which the Department may request to determine whether cause exists for imposing conditions upon” a registration statement.

v. Wayland, 380 Mass. 110, 118 (1980), quoting from *Haines v. Town Manager of Mansfield*, 320 Mass. 140, 142 (1946)).

CONCLUSION

For the reasons discussed above, this Court should rule that DEP may legally impose conditions on renewal registrations to carry out the purposes of the WMA.

Respectfully submitted,

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