



*The Commonwealth of Massachusetts*  
*Executive Office of Energy and Environmental Affairs*  
*100 Cambridge Street, Suite 900*  
*Boston, MA 02114*

Deval L. Patrick  
GOVERNOR

Timothy P. Murray  
LIEUTENANT GOVERNOR

Ian A. Bowles  
SECRETARY

Tel: (617) 626-1000  
Fax: (617) 626-1181  
<http://www.mass.gov/envir>

October 2, 2009

DRAFT AMENDED RECORD OF DECISION

PROJECT NAME : ADM Tihonet Mixed Use Development  
PROJECT MUNICIPALITY : Carver, Plymouth and Wareham  
PROJECT WATERSHED : Buzzards Bay  
EOEEA NUMBER : 13940A  
PROJECT PROPONENT : ADM Development Services LLC  
DATE NOTICED IN MONITOR : July 22, 2009

Pursuant to the Massachusetts Environmental Policy Act (MEPA) (G.L.c.30, ss. 61-62I) and Section 11.11 of the MEPA regulations (301 CMR 11.00), I have reviewed the Notice of Project Change (NPC) and request for an amended Phase One Waiver, and hereby **propose to grant** a waiver that will allow the Proponent to proceed with Phase One of the project prior to preparing a mandatory Environmental Impact Report (EIR) for the entire project.

Project Description

As described in the Expanded ENF, the entire project entails development of a 6,074-acre site in the towns of Wareham, Carver and Plymouth, which is proposed as a phased development over the next 25 years or more. The site currently contains the corporate headquarters of the A.D. Makepeace (ADM) Company, and includes cranberry bogs as well as undeveloped lands considered ecologically significant due to the presence of BioMap Core Habitat, Priority Habitat for rare and endangered species, and the underlying sole source aquifer. The phased development as proposed in the Expanded Environmental Notification Form (ENF) submitted in July 2008 consists of a mixed-use village community that will incorporate principles of smart growth, open space preservation, low impact development, traditional village design, and pedestrian orientation. The Expanded ENF proposes the use of Transfer of Development Rights (TDR) to concentrate development in certain areas and ensure conservation of ecologically significant lands.

Phase One (referred to as Phase A in the NPC) involves construction of an office and light industrial development on an approximately 16-acre portion of the site (A1), construction of a medical office building on a 13-acre portion of the site (A2), and a 5-acre cranberry bog development (A3). Phase One is located within the Town of Wareham.

### MEPA History

In accordance with the Special Review Procedure (SRP) for the project dated January 29, 2007, the Proponent filed an Expanded ENF (July 2008) that included baseline environmental resource assessment and infrastructure assessment for the entire project site, and information and analysis pertaining to the proposed Phase A and Phase B developments. Pursuant to the SRP, the Certificate on Expanded ENF, dated September 12, 2008, included a Scope for the EIR for Phase B (the Business Development Overlay and General Commercial District (BDOD)) and for certain aspects and impacts of Phase C. The SRP allows for subsequent phases of the project to file a new ENF and includes requirements for cumulative impact assessment, public outreach, and extended public comment periods. I also issued a Final Record of Decision (FROD) on October 15, 2008 granting a waiver that allowed the Proponent to proceed with Phase A of the project prior to preparing a mandatory EIR for the entire project.

The current NPC filing entails a request for an amended Phase One waiver. As previously proposed, Phase A included two phases (A1 and A2). Phase A1 consisted of 115,000 square feet (sf) of office and light manufacturing space located in the southeastern quadrant of the 60-acre Tihonet Technology Park. Phase A2 consisted of a 40,000 sf medical office building on a six-acre parcel located on Lou Avenue off Route 28. Changes to Phase A as proposed in the NPC include a reduction in the size of Phase A1, relocation and increase in size of Phase A2, and a new Phase A3 component consisting of construction of a 5-acre cranberry bog.

### MEPA Jurisdiction and Permitting

Permits required for Phase A include a Vehicular Access Permit from the Massachusetts Highway Department (MassHighway) for access onto Route 28 and a Conservation and Management Permit from the Division of Fisheries and Wildlife, Natural Heritage and Endangered Species Program (NHESP). Phase A also requires an Order of Conditions from the Wareham Conservation Commission (and, on appeal only, a Superseding Order from the Massachusetts Department of Environmental Protection (MassDEP)).

The project is subject to the MEPA Greenhouse Gas Emissions Policy and Protocol. The project is subject to review by the Massachusetts Historical Commission (MHC) and may be subject to federal consistency review by the Massachusetts Office of Coastal Zone Management (CZM). The project is also subject to the U.S. Environmental Protection Agency (EPA) National Pollutant Discharge Elimination System (NPDES) permit requirements for construction activities.

Future phases of the project require additional permits. Phase B as proposed in the Expanded ENF requires a MassHighway Vehicular Access Permit, a Conservation and Management Permit from NHESP, and an Order of Conditions from the Wareham Conservation Commission (and, on appeal only, a Superseding Order from MassDEP). Phase B also requires a Groundwater Discharge Permit, 401 Water Quality Certification, Water Supply System Distribution Modification, and a Sewer Extension/Connection Permit from MassDEP. Phase C will require additional permits including a Groundwater Discharge Permit and New Source Approval from MassDEP, and a Conservation and Management Permit from NHESP.

The project is undergoing environmental review and subject to the requirements for an EIR because it requires state Agency Actions and exceeds MEPA review thresholds, including several thresholds for a mandatory EIR. The project is undergoing review pursuant to the following sections of the MEPA regulations: Section 11.03(1)(a)(1) and (2) because it will involve alteration of 50 or more acres of land and creation of 10 or more acres of new impervious area; Section 11.03(2)(b)(2) because it will likely result in a taking of a state-listed species; Section 11.03 (3)(b)(d) and (f) because it involves alteration of 5,000 or more sf of Bordering Vegetated Wetlands (BVW) and alteration of one-half or more acres of other wetlands; Section 11.03(4)(b)(3) because it involves construction of one or more new water mains five or more miles in length; Section 11.03(5)(b)(3)(c) because it will result in construction of five or more miles of new sewer main; and Section 11.03(6)(a)(6) and (7) because it will result in generation of 3,000 or more new vehicle trips and 1,000 or more new parking spaces. Phase B may also exceed the mandatory EIR threshold at 11.03(1)(1)(a) for alteration of one or more acres of BVW. Phase C may exceed other MEPA review thresholds.

The Proponent has applied for financial assistance from the Commonwealth, including grants from the Massachusetts Technology Collaborative, and is likely to apply for additional funding such as financial assistance from the Massachusetts Opportunity Relocation and Expansion (MORE) Program. Because the project involves financial assistance from the Commonwealth, MEPA jurisdiction is broad and extends to all aspects of the project likely to cause damage to the environment as defined in the MEPA regulations.

#### Summary of Potential Environmental Impacts Associated With Phase A

The proposed Phase A involves alteration of approximately 40.6 acres of land, including 13.9 acres of impervious area. Phase A will impact approximately 1,682 sf of BVW associated with a proposed wetland crossing at Rose Brook to access the Phase A2 area (Rosebrook Business Center). Additional wetlands impacts include 210 linear feet of Bank alteration, 28,200 sf of Riverfront Area alteration, and 36,810 sf of impact to Bordering Land subject to Flooding (BLSF). Phase A will result in a "taking" of a state-listed Species of Special Concern, the Eastern Box Turtle (*Terrapene carolina*).

Phase A1 has been reduced in size from what was presented in the Expanded ENF and approved in the FROD (a 115,000 sf building) to an 80,000 sf building, and the ratio of office to

light manufacturing space has been modified. As a result, traffic generation is expected to decrease from 828 trips per day, as previously reviewed, to 450 trips per day. Parking spaces have been reduced from 407 to 256 spaces. The Phase A2 building has increased in size from 40,000 sf (as approved in the FROD) to 65,850 sf to accommodate the new tenant, and Phase 2 also includes a 5,000 sf gatehouse, which will be unoccupied but may be used for storage and office space in the future. Traffic generation for Phase A2 is expected to increase from 1,422 trips per day as previously reviewed to 2,478 trips per day. Parking spaces for Phase A2 have increased from 170 to 279 spaces. Overall the proposed Phase A changes from what was previously approved in the FROD result in an increase of 678 trips per day for a total of 2,928 trips and parking spaces are reduced by 42 for a total of 535 spaces. The increase in impervious area (2.6 acres) is primarily associated with the extension of Lou Avenue to the Phase 2 area and proposed connection with Tihonet Road, which will provide two access points to the site.

Based on the Proponent's analysis, Greenhouse Gas (GHG) emissions associated with Phase A, are estimated to be 1,722 tons per year for building-related CO<sub>2</sub> emissions and 7,972 to 8,365 tons per year of CO<sub>2</sub> from indirect transportation sources.

The Phase A1 water demand is estimated in the NPC at 2,748 gallons per day (gpd) and Phase A2 is estimated at 2,470 gpd for a total water demand of 5,218 gpd. Municipal water supply and fire services will be provided by the Town of Wareham. Wastewater generation is estimated at 5,496 gpd for Phase A1 and 4,940 gpd for Phase A2. Phase A1 will be served by a Title 5 septic system with enhanced nitrogen removal. As previously proposed, connection to the Wareham Sewage Treatment Plant is the preferred alternative for Phase A2 wastewater (a Title 5 system with enhanced nitrogen removal is proposed if the municipal connection is not feasible).

Water demand and wastewater flows have decreased for Phase A1 and A2 since the previous filing due to the proposed changes in building size and uses. The additional water demand overall for Phase A as indicated in the NPC is associated with the proposed cranberry bog (Phase A3) that will use approximately 26,780 gpd. This water withdrawal is included in the existing MassDEP Water Management Act permits for the agricultural operations on-site.

#### Summary of Proposed Mitigation Measures For Phase A

*Rare Species:* The Proponent will implement mitigation as required by NHESP including Eastern Box Turtle protection during construction and permanent protection of 24 acres of Box Turtle Habitat.

*Wetlands:* The Proponent will provide mitigation will be provided at a ratio of 1:1 or greater for unavoidable alterations to wetland resource areas in accordance with the Wetlands Protection Act and the Town of Wareham Wetlands Protection Bylaw. The Proponent has identified areas on-site for BVW replication.

*Transportation:* The Proponent will implement off-site improvements along Route 28 consisting of signalization and reconstruction of the Route 28/Lou Avenue intersection, optimization of the signal timing and phasing at the I-195 interchange ramps, and upgrading of signs and pavement markings at the Route 28/Tihonet Road, Cranberry Road/Tihonet Road, Cranberry Road/Federal Road, and Wareham Street/Hammond Street intersections. Transportation Demand Management (TDM) measures include: pedestrian improvements, bicycle accommodations and measures to encourage tenant use of traffic reduction strategies such as ridesharing, public transportation use, and alternative work schedules. The Proponent will work with the Town of Wareham, MassHighway, Southeastern Regional Planning and Economic Development District (SRPEDD), and the Greater Attleboro-Taunton Transit Regional Authority (GATRA) to evaluate the feasibility of providing bus service to the project. The Proponent has also committed to providing financial assistance to GATRA to support the service route expansion. The Proponent will update, refine and expand the TDM program as necessary to accommodate future phases of the project which will be evaluated in subsequent MEPA filings.

*Stormwater:* The Proponent will construct stormwater management systems in compliance with MassDEP stormwater management regulations, which will incorporate Low Impact Development (LID) measures such as vegetated swales and rain gardens. The Proponent will implement erosion and sedimentation controls during construction and a Stormwater Pollution Prevention Plan.

*Wastewater:* The Proponent will construct a Title 5 on-site sewage disposal system with enhanced nitrogen removal for Phase A1 and proposes a municipal sewer connection for Phase A2 (which will result in a reduced nitrogen loading compared with a Title 5 system).

*Agricultural Nitrogen:* The Proponent will implement the nutrient Best Management Practices (BMPs) developed by the University of Massachusetts (UMass) Amherst Cranberry Station.

*Cultural Resources:* The Proponent has retained the Public Archaeological Laboratory (PAL) to conduct archaeological surveys and will continue to coordinate with MHC on cultural resource issues and any mitigation that may be required.

*Greenhouse Gas Emissions:* The Proponent will implement a range of GHG mitigation measures as outlined below, which are estimated to achieve at least a 14 percent reduction in CO<sub>2</sub> for building-related emissions and up to 4.7 percent reduction in CO<sub>2</sub> emissions from transportation-related sources. The Proponent has specifically committed to the following:

- Use high-albedo roofing materials;
- Install high-efficiency HVAC systems;
- Eliminate or reduce use of refrigerants in HVAC systems;
- Maximize interior daylighting;
- Incorporate window glazing, super insulation, motion sensors and lighting and

- climate control, and efficient directed exterior lighting;
- Use water conserving fixtures that exceed building code requirements;
  - Re-use grey water and/or collect and re-use rainwater;
  - Provide for storage and collection of recyclables;
  - Use building material with recycled content, and those that are extracted and/or manufactured within the region;
  - Use wood that is certified in accordance with the Forestry Stewardship Council's principles and criteria;
  - Use low-VOC adhesives, paints, carpets and wood;
  - Conduct 3<sup>rd</sup> party building commissioning to ensure energy performance;
  - Provide construction and design guidelines to facilitate sustainable design for build-out by tenants;
  - Purchase Energy Star-rated appliances that are the lowest energy rating;
  - Use lower GHG-emitting fuels when available (e.g. natural gas instead of fuel oil);
  - Engage a Leadership in Energy and Environmental (LEED) certified architect to assist in developing an energy-efficient design for Phase A1 and Phase A2;
  - Implement a Transportation Demand Management (TDM) program and transportation improvements as outlined above.

*Sustainable Design:* The Proponent has committed to additional sustainable design features including permanent protection of open space on-site, conservation and restoration of natural areas on-site, and water-efficient landscaping.

### Waiver Request

The Proponent has requested an amended Phase One waiver that will allow the Proponent to proceed with Phase A of the project prior to preparing a mandatory Environmental Impact Report (EIR) for the entire project. As outlined above, the NPC submitted in conjunction with this request identifies the environmental impacts of Phase A and describes measures to be undertaken by the Proponent to avoid, minimize and mitigate project impacts. The Expanded ENF previously submitted includes an assessment of impacts associated with Phase B and a conceptual plan for Phase C, as well as a baseline assessment of environmental resources and infrastructure. The previously-issued Special Review Procedure and Scope for the Phase B EIR remain unchanged by the filing of the NPC and request for Amended Waiver.

### Standards for All Waivers

The MEPA regulations at 301 CMR 11.11(1) state that I may waive any provision or requirement in 301 CMR 11.00 not specifically required by MEPA and may impose appropriate and relevant conditions or restrictions, provided that I find that strict compliance with the provision or requirement would:

- (a) result in an undue hardship for the Proponent, unless based on delay in compliance by the Proponent; **and**
- (b) not serve to avoid or minimize Damage to the Environment.

#### Determinations for a Phase One Waiver

The MEPA regulations at 301 CMR 11.11(4) state that, in the case of a partial waiver of a mandatory EIR review threshold that will allow the Proponent to proceed with Phase One of the project prior to preparing an EIR, I shall base the finding required in accordance with 301 CMR 11.11(1)(b) on a determination that:

- (a) the potential environmental impacts of Phase One, taken alone, are insignificant;
- (b) ample and unconstrained infrastructure facilities and services exist to support Phase One;
- (c) the project is severable, such that Phase One does not require the implementation of any other future phase of the project or restrict the means by which potential environmental impacts from any other phase of the project may be avoided, minimized or mitigated; **and**
- (d) the agency action(s) on Phase One will contain terms such as a condition or restriction, so as to ensure due compliance with MEPA and 301 CMR 11.00 prior to commencement of any other phase of the project.

#### Findings

Based upon the information submitted by the Proponent and after consultation with the state permitting agencies, I find that the Waiver request has merit and that the Proponent has demonstrated that the proposed project meets the standards for all waivers at 301 CMR 11.11(1). I find that strict compliance with the requirement to submit a mandatory EIR prior to completion of Phase One of the project would result in an undue hardship for the Proponent **and** would not serve to avoid or minimize Damage to the Environment. In accordance with 301 CMR 11.11(4), the latter finding is based on my determination that:

- (a) the potential environmental impacts of Phase One (Phase A), taken alone, are insignificant;

I am satisfied that Phase A can be implemented in a manner that results in insignificant impacts provided that the Proponent complies with the conditions of this Record of Decision, implements the mitigation as proposed in the NPC, and adheres to the conditions imposed by NHESP and MassHighway, which I expect will be incorporated in their respective permits and Section 61 Findings.

*Endangered Species*

Phase A1, which will be located in the southeast quadrant of the Tihonet Technology Park (TTP) and Phase A3, the proposed cranberry bog expansion, will impact Eastern Box Turtle habitat and require Conservation and Management Permits from NHESP under the Massachusetts Endangered Species Act (MESA). NHESP issued a permit (June 23, 2009) for Phase A1, consistent with the previously-issued FROD, which requires turtle protection during construction and permanent protection of 24 acres of Eastern Box Turtle habitat.

NHESP has agreed to permit Phase A1 and A3 separately from future phases of the project if the amended Phase A waiver is granted. Phase A2 does not require a Conservation and Management Permit. NHESP believes this approach will not reduce its ability to work with the Proponent to address cumulative impacts of the project as a whole on endangered species and their habitats. As noted in its comment letter, this is in part because Phase A work will have little to no impact on globally rare scrub oak barren species, which NHESP indicates will be of greatest concern as a Master Plan for the entire project site is developed. The Proponent has committed to work with NHESP to address cumulative impacts to endangered species on a site-wide basis and minimize habitat fragmentation impacts as part of its master planning process.

*Wetlands*

As noted above, the Proponent will provide mitigation for wetlands impacts in accordance with the Wetlands Protection Act and the Town of Wareham Wetlands Protection Bylaw. The Proponent has also committed to implement erosion and sedimentation controls prior to the commencement of construction activities to protect wetlands resources.

*Stormwater*

The Proponent will construct stormwater management systems in compliance with MassDEP stormwater regulations, and incorporate low impact development (LID) features. The Proponent should investigate additional opportunities for LID and incorporate these in Phase A design to the maximum extent feasible. I expect a detailed update on LID techniques incorporated in Phase A as part of the DEIR filing.

*Transportation*

The Proponent has committed to mitigation for transportation impacts as outlined above. The Executive Office of Transportation (EOT) has recommended that no further review of Phase A is required based on transportation issues. As a condition of this



Record of Decision, the Proponent should monitor and reevaluate the traffic impacts of the project at the Route 28/Lou Avenue intersection and along the Route 28 corridor in each MEPA filing for subsequent phases of the project. The Proponent should continue consultations with EOT and MassHighway to address further design details or access-related issues during the permitting process for Phase A of the project.

#### *Wastewater and Nitrogen Loading*

According to the NPC, Phase A of the project does not require state agency permits for wastewater discharge. The NPC proposes a Title 5 system with enhanced nitrogen removal for Phase A1 and a municipal sewer connection for Phase A2 (which will result in a reduced nitrogen loading compared with a Title 5 system). The NPC indicates that if the town is unable to accommodate Phase A2 wastewater flows, a Title 5 system with enhanced nitrogen removal will be constructed on-site, and may be abandoned in the future if connection to the municipal system is feasible.

The Wareham River is listed on the Massachusetts Integrated List of Impaired Waters. Efforts are underway to develop a Total Maximum Daily Load (TMDL) for nitrogen for the Wareham River Estuary. Future phases of the project that require a Groundwater Discharge Permit from MassDEP will likely be subject to nitrogen offset requirements. However, Phase A does not require a Groundwater Discharge Permit. The proposed Title 5 systems and possible connection to Wareham's municipal wastewater infrastructure are not subject to nitrogen offset requirements. Although the Proponent is required to evaluate a nitrogen-neutral alternative for the entire project in the DEIR, Phase One alone is not subject to any regulatory requirement to be nitrogen-neutral. As a condition of this Draft Amended Record of Decision, I expect that nitrogen loading impacts and mitigation will be addressed in future filings as required by my previous Certificate on the Expanded ENF. The Proponent should include, in the DEIR, a cumulative analysis of the project's nitrogen impacts (including Phase A), a nitrogen-neutral alternative, and mitigation proposals for all phases of the project. In the meantime, the Proponent should continue to work with the Town of Wareham, MassDEP, and other stakeholders to identify opportunities for the implementation of nitrogen offsets for Phase A prior to the preparation of the DEIR. As recommended by the Buzzards Bay National Estuary Program, the Proponent should work with MassDEP to ensure that the nitrogen loading calculations in the DEIR are consistent with the Massachusetts Estuaries Project nitrogen-loading model.

#### *Greenhouse Gas (GHG) Emissions*

This proposed Phase One Waiver is conditional upon the Proponent's implementation of GHG mitigation measures as outlined in the NPC and in a Memorandum from the Proponent dated September 24, 2009. The Proponent's mitigation commitments include a range of site design, transportation and building-

related measures that are estimated to reduce Phase A Carbon dioxide (CO<sub>2</sub>) emissions by at least 14 percent for building-related emissions and 0 to 4.7 percent for indirect transportation emissions (an estimated 3 to 6 percent overall reduction for Phase A direct and indirect GHG emissions combined)

Upon completion of construction of Phase A, the Proponent should provide a certification to the MEPA Office signed by an appropriate professional (e.g. engineer, architect, general contractor) indicating that all of the GHG mitigation measures, or equivalent measures that are designed to collectively achieve the 14 percent stationary source GHG emission reduction committed to in the NPC, have been incorporated into the project. The certification should be supported by as-built plans. For those measures that are operational in nature (i.e. TDM, recycling, use of Energy Star-rated equipment), the Proponent should provide an updated plan identifying the measures, the schedule for implementation and how progress toward achieving these measures will be obtained. EOT/MassHighway should incorporate this self-certification requirement into its Section 61 Finding for the Phase A portion of the project.

The DEIR should include a progress report on the implementation of GHG mitigation measures for Phase A. I note that the Certificate on the Expanded ENF requires that the DEIR include a cumulative impact analysis of GHG emissions for all phases of the proposed project.

(b) ample and unconstrained infrastructure facilities and services exist to support Phase One;

Phase A is located in areas of the project site that are accessible to existing transportation and water supply infrastructure. As noted above, the Proponent has committed to transportation improvements and a TDM program. The Wareham Fire District notes in its comment letter that it has sufficient capacity to meet the estimated water supply demand for the development as outlined in the NPC. As noted above, the Proponent will construct an on-site Title 5 system with enhanced nitrogen removal to manage Phase A1 wastewater flows and proposes a connection to existing municipal sewer infrastructure for Phase A2 (or a Title 5 system if the municipal connection is not feasible).

(c) the project is severable, such that Phase One does not require the implementation of any other future phase of the project or restrict the means by which potential environmental impacts from any other phase of the project may be avoided, minimized or mitigated;

Phase A represents a discreet portion of the overall project and does not depend on implementation of any future phase. Given the nature and extent of the entire project

site, the scope and location of Phase A, and the provisions of the SRP, I am satisfied that Phase A will not restrict the means by which impacts from any other phase of the project may be avoided, minimized or mitigated.

and

(d) the agency action(s) on Phase One will contain terms such as a condition or restriction, so as to ensure due compliance with MEPA and 301 CMR 11.00 prior to commencement of any other phase of the project.

I expect that state agencies will incorporate appropriate conditions and mitigation requirements in their respective permits and Section 61 Findings to reflect the conditions of this Record of Decision and to ensure due compliance with MEPA prior to commencement of any other phase of the project. State agencies should forward copies of final Section 61 Findings to the MEPA Office for the project record.

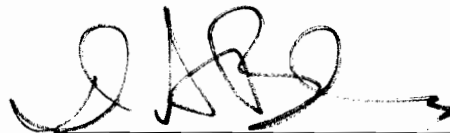
### Conclusion

I have determined that this waiver request has merit, and am issuing this Draft Amended Record of Decision, which will be published in the next edition of the *Environmental Monitor* on October 7, 2009 in accordance with 301 CMR 11.15(2), which begins the public comment period. The public comment period lasts for 14 days and will end on October 21, 2008. Based on written comments received concerning the Draft Amended Record of Decision, I shall issue a Final Amended Record of Decision within seven days after the close of the public comment period, in accordance with 301 CMR 11.15(6).

I hereby **propose to grant** the waiver requested for this project, which will allow the Proponent to proceed with Phase A of the project prior to preparing a mandatory EIR for the entire project, subject to the above findings, and conditions.

October 2, 2009

Date



Ian A. Bowles, Secretary

## Comments Received:

7/25/09 Massachusetts Historical Commission  
8/05/09 Wareham Fire District  
8/06/09 Division of Marine Fisheries  
8/31/09 Southcoast Hospital Group  
9/02/09 Cape Cod Cranberry Growers' Association  
9/03/09 Division of Fisheries and Wildlife, Natural Heritage and Endangered Species Program  
9/04/09 The Wareham Land Trust  
9/04/09 Wareham Ford, Inc.  
9/04/09 Office of Coastal Zone Management, Buzzards Bay National Estuary Program  
9/04/09 The Coalition for Buzzards Bay  
9/08/09 Oliver Durrell III  
9/08/09 Town of Wareham, Board of Selectmen  
9/08/09 Massachusetts Department of Environmental Protection  
9/08/09 Southeastern Regional Planning & Economic Development District  
9/08/09 Town of Wareham, Community and Economic Development Authority  
9/09/09 Executive Office of Transportation and Public Works (EOT)  
9/24/09 EOT (additional email correspondence)

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