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March 29, 2007

CERTIFICATE OF THE SECRETARY OF ENVIRONMENTAL AFFAIRS  
ON THE  
DRAFT ENVIRONMENTAL IMPACT REPORT

PROJECT NAME : Hillside at 495 Center  
PROJECT MUNICIPALITY : Northborough  
PROJECT WATERSHED : Assabet  
EOEA NUMBER : 12916  
PROJECT PROPONENT : Northborough Land Realty Trust /The Gutierrez  
Company  
DATE NOTICED IN MONITOR : February 6, 2007

As Secretary of Environmental Affairs, I determine that the Draft Environmental Impact Report (DEIR) submitted for this project adequately and properly complies with the Massachusetts Environmental Policy Act (MGL, c. 30, ss. 61-62H) and with its implementing regulations (301 CMR 11.00). The DEIR has presented sufficient information on the environmental impacts and mitigation associated with the Hillside at 495 Center project to allow a finding that it is generally responsive to the Scope contained in the Certificate on the Notice of Project Change (NPC) issued on August 25, 2006 scope.

However, while I find that the DEIR is adequate, the proponent must provide additional information in the FEIR before I can make a finding that the project complies with MEPA, specifically information pertaining to the potential cumulative infrastructure impacts and site planning issues arising out of the full build-out of the proponent's eight development parcels in the project area (Full-Build Scenario). This information is necessary to ensure that the requirements of 301 CMR 11.07 are met, that the aspects and issues of the entire project have been clearly described, that a range of project alternatives have been fully analyzed, that the

proponent has committed to a set of mitigation measures that will allow the State Agencies to satisfy their Section 61 obligations, and that there will be meaningful opportunities for public review of the additional analysis prior to any Agency action.

As part of the DEIR submission, the proponent has requested that I grant a second Phase 1 Waiver on the project site to allow an additional phase of the project to proceed pending the preparation of a Final Environmental Impact Report (FEIR) for the entire project. I have carefully reviewed the DEIR and supporting documentation and written comments on the Phase 1 Waiver request. In a Draft Record of Decision (DROD), also issued today, I have proposed to **grant** a Phase 1 Waiver with conditions, thereby allowing this second Phase 1 of the project to proceed while the FEIR is being prepared.

### Project Description

In November 2002, the proponent submitted an Environmental Notification Form (ENF) to MEPA proposing the two-phase development of a 260,000 square foot (sf) warehouse building (Phase 1), 6,700 parking spaces, and approximately 2,000,000 (sf) of office space in four buildings (Phase 2), and associated infrastructure on a 175 acre-site south of Bartlett Street and east of Lyman Street in Northborough.

The project will consume a total of approximately 172,040 gallons per day (gpd) of water and will generate approximately 156,400 gpd of wastewater flow. The proponent proposes to discharge the wastewater generated from the Phase 1 portion of the project (6,400 gpd) to an on-site Title V septic system. The proponent proposes to discharge the wastewater generated from Phase II (150,000 gpd) to the Town of Northborough's municipal sewer collection system for treatment at the City of Marlborough's Westerly Wastewater Treatment Facility.

Using the Institute of Traffic Engineers Trip Generation land use codes 750 for Office Park and 150 for Warehouse/Distribution, the project is estimated to generate a combined total of approximately 22,720 vehicle trips on the average weekday. An air quality mesoscale analysis for ozone will be needed for this project to assess the total volatile organic compounds (VOC) and nitrogen oxides (NOx) emissions associated with all project-related vehicle trips.

### MEPA Jurisdiction

The project is undergoing review and requires preparation of an EIR pursuant to sections 11.03 (1)(a)(1) and (1)(a)(2) of the MEPA regulations because the project requires state permits and will involve the direct alteration of 50 or more (111.7 acres total) acres of land and the creation of more than 10 acres (91.6 acres total) of new impervious surfaces. The project as currently designed also requires a Groundwater Discharge Permit from the Department of Environmental Protection (MassDEP) and an Order of Conditions from the Northborough Conservation Commission (and hence a Superseding Order from DEP if the local Order is

appealed). I note that although the proposed project will generate more than 3,000 new vehicle trips per day (vtd) (22,720 total), and provide more than 1,000 new surface parking spaces (6,700 total), it does not appear to require a Highway Access Permit from the Massachusetts Highway Department (MassHighway). The project also requires a Construction Dewatering Permit, a Fossil Fuel Emission Permit and a Groundwater Discharge Permit from MassDEP. The project must comply with the National Pollutant Discharge Elimination System (NPDES) General Permit for stormwater discharges from a construction site of over five acres and for a Construction Site Dewatering Discharge Permit from the U.S. Environmental Protection Agency (EPA).

### Project History

#### *Environmental Notification Form (ENF)/First Phase 1 Waiver Request*

As part of the November 2002 ENF submittal, the proponent requested a Phase 1 Waiver to allow the construction of a 260,000 sf warehouse with 326 surface parking spaces and 26 loading docks on a 25-acre portion of the project site abutting Lyman Street (Phase 1 - Lyman Street Warehouse), in advance of the preparation of an EIR for the full build-out of the site. The proponent's Phase 1 Waiver request was granted in a Record of Decision issued in March 2003.

The majority of the Phase 1 project site was disturbed by past sand and gravel extraction activities. According to the ENF, the Lyman Street warehouse portion of the 175 acre-site project site is located within a designated Area 1 Wellhead Protection Area for the Town of Northborough's Groundwater Protection Overlay District (GPOD), and within a DEP designated Interim Wellhead Protection Area (IWPA). These designations were established to protect the recharge areas surrounding an existing municipal water supply well site located a short distance to the west of the Phase 1 site. Phase 1 required a Groundwater Discharge Permit from MassDEP, and an Order of Conditions from the Northborough Conservation Commission. Work performed in Phase 1, which was completed in 2005, included construction of a single-story 260,000 sf warehouse and distribution facility, 326 surface parking spaces, 26 loading docks, an on-site septic system, a stormwater management system, and a comprehensive erosion and sedimentation control program. The Phase 1 - Lyman Street warehouse project resulted in the creation of more than 10.0 acres of impervious surface area, and the generation of approximately 1,300 new vehicle trips per day. Phase 1 work involved construction activities within the 100-foot buffer zone for Bordering Vegetative Wetlands (BVW), but did not impact any wetland resource areas located within the project site.

#### *Notice of Project Change(NPC)/Second Phase 1 Waiver Request*

In June 2006, the proponent submitted a Notice of Project Change (NPC) proposing a number of modifications to the Phase 2 development program for the. Specifically, the proponent proposed to reduce the amount of proposed new office space and to incorporate a second warehouse/distribution center (the A. Duie Pyle Company warehouse) into the overall project development program. Phase 2 now entails the construction of a total of 1,525,000 sf of new

building space consisting of office, research & development space to be located in three separate buildings, and a separately located 116,600 sf warehouse/distribution center building with a total of approximately 5,846 total parking space (315 spaces for the warehouse distribution center, and 5,531 spaces for the office space), related utilities and stormwater management infrastructure, and traffic mitigation roadway improvements. The implementation of the new project development program as described in the NPC will result in an increase to land alteration (approximately 12,600 sf), and minor decreases to impervious surface area, potable water demand, wastewater flows, parking, and traffic generation, as compared with the development program presented in the ENF. The NPC also included a second Phase 1 Waiver request to construct 91,500 sf (78 percent) of the 116,600 sf A. Duie Pyle warehouse facility, thereby allowing its construction to proceed in advance of the preparation of an Environmental Impact Report (EIR) for the entire project. The Certificate on the NPC issued in August 2006 denied the proponent's request for a Phase 1 Waiver.

### Review of the DEIR

#### *Stormwater Management/Drainage*

As currently designed, the project will create approximately 92 acres of new impervious surface area. The proposed stormwater management plan has been designed in accordance with MassDEP's Stormwater Management Guidelines. According to the DEIR, the project will exceed standards for redevelopment projects and provide a Total Suspended Solids (TSS) removal rate in excess of the 80 percent standard for new construction. Stormwater and roof runoff from the Phase 2 area will be collected through a series of natural and structural best management practices (BMPs) including deep sump catch basins equipped with Stormceptor or equivalent units located throughout the entire project site and piped to five surface and four subsurface stormwater detention basins to collect, treat and provide total recharge of stormwater generated from the proposed Phase 2 portion of the project.

The Phase 2 area is located adjacent to the Little Crane Swamp, which is a tributary to the Wachusett Aqueduct Open Channel and is classified as an Outstanding Resource Water (ORW). Additionally, a portion of the Phase 2 area is located within a MassDEP approved Interim Wellhead Protection Area (IWPA) and Town of Northborough Groundwater Overlay Protection District (GOPD) for the Lyman Street well which serves as a potable public drinking water supply for the Town of Northborough. The proponent should consult with MassDEP to ensure that the project's stormwater management plan and best management practices (BMPs) will be designed to meet MassDEP's Stormwater Management Policy guidelines and standards, especially as they may apply to Critical Areas.

I strongly encourage the proponent to evaluate sustainable design alternatives such as Low Impact Development (LID) techniques in site design and stormwater management plans. LID techniques incorporate stormwater best management practices (BMPs) and can reduce impacts to land and water resources by conserving natural systems and hydrologic functions. The

primary tools of LID are landscaping features and naturally vegetated areas, which encourage detention, infiltration and filtration of stormwater on-site. Other tools include water conservation and use of pervious surfaces. Clustering of buildings is an example of how LID can preserve open space and minimize land disturbance. LID can also protect natural resources by incorporating wetlands, stream buffers and mature forests as project design features. For more information on LID, visit <http://www.mass.gov/envir/lid/>. Other LID resources include the national LID manual (Low Impact Development Design Strategies: An Integrated Design Approach), which can be found on the EPA website at: <http://www.epa.gov/owow/nps/lid/>.

### *Historic Resources*

In its comments on the ENF, the Massachusetts Historical Commission (MHC) indicated that portions of the Phase 2 project site were likely to contain archaeological sites associated with the Native American occupation of Northborough. As described in the DEIR, the proponent completed an intensive locational archaeological survey for the entire project site in July 2006, and did not identify any cultural/archaeological resources, including Native American cultural materials.

### *Related Development Projects*

As identified in the DEIR, the proposed Hillside at 495 Center project site, along with seven other development parcels located in the project area and identified as Bartlett at 495 Center, Devonshire at 495 Center, Beacon at 495 Center, Cedar Hill, the Hayes parcel, and the Commonwealth development parcels (approximately 500 acres total), appear to be owned and controlled by the same ownership interests. The DEIR contains a discussion of the impacts resulting from the Hillside at 495 project, as well as the potential cumulative infrastructure impacts and site planning issues resulting from the full build-out of the proponent's eight development parcels, identified as the Full-Build Scenario. The Secretary's Certificate on the ENF required this section of the DEIR to function as a master plan to guide development along the Bartlett Street, Forest Street, Hayes Memorial Drive, and Cedar Hill Road corridors in a manner that minimizes overall impacts. As described below, the FEIR must provide additional information and discuss the potential cumulative water, wastewater and traffic impacts and site planning issues resulting from the Full-Build Scenario.

## **FINAL EIR SCOPE**

### Hillside at 495 Center

#### *Wetlands*

The Hillside at 495 Center project has been designed to avoid impacts to Bordering Vegetated Wetland (BVW) resource areas. However, the project will result in the direct alteration of the 100-foot wetland buffer zone. As depicted in the site plan, significant portions of internal roadways, surface parking areas, stormwater best management practices (BMPs), and landscaped open spaces are located within the 100-foot wetlands resource bufferzone. The FEIR

should quantify the extent of total alteration of wetland buffer zone proposed in the proponent's final design for the phased Hillside at 495 Center project. The FEIR should examine alternatives that avoid or further minimize impacts to wetland resource areas and their associated buffer zones.

#### *Water Supply*

The potable water demand for Phase 2 of the Hillside at 495 Center project (approximately 128,400 gallons per day (gpd)) will be served by the Town of Northborough's municipal system via a connection to an existing 16-inch water main located within the Bartlett Street right-of-way. As described in the DEIR, the Town of Northborough entered into a contractual agreement with the Massachusetts Water Resources Authority (MWRA) to purchase up to 2.1 millions gallons per day (MGD) of water from MWRA. Northborough currently purchases nearly all of its water (approximately one million gpd) from MWRA. The FEIR should identify the total combined potable water demand for Phases 1 and 2 of the project, and discuss the impacts of this total combined water supply demand on the Northborough water supply system.

The proponent should consult with MassDEP to ensure that the final project design meets the Commonwealth's water conservation standards, including those standards pertaining to lawn and landscape conservation. I also encourage the proponent to consider developing an Irrigation Management Plan (IMP) to further reduce the project's irrigation water demand. The proponent's IMP should include the use of: xeroscaping, amended soils and compost; the planting of native and drought-tolerant species of trees, shrubs, and turf grasses; an automated water efficient irrigation system; and a water management protocol for drought conditions. The proponent should also consult with MassDEP in the final design of the project's landscape plan.

#### *Wastewater*

As described in the DEIR, the Phase 2 development program (the proposed Duie Pyle warehouse project, and the proposed office development), will generate approximately 116,625 gpd of total wastewater flow. The proponent proposes to discharge the wastewater flows from the Duie Pyle warehouse facility (2,950 gpd) to the City of Marlborough's Westerly Wastewater Treatment Facility (Westerly WWTF) via a lateral connection to the City's existing sewer located along Crane Meadow Road. I note that the wastewater flows (approximately 6,500 gpd) from Phase 1 of the Hillside at 495 Center project (Lyman Street warehouse/distribution center) are treated by an on-site treatment and subsurface disposal system. According to the DEIR, the proponent has a wastewater flow allocation of approximately 10,000 gpd that was originally approved by the Town of Northborough's Water and Sewer Board for the proponent's Bartlett at 495 Center warehouse project (4,500 gpd), and Cedar Hill office development project (4,350 gpd).

The wastewater flows (2,950 gpd) from the Duie Pyle warehouse will be served by the City of Marlborough's Westerly Wastewater Treatment Facility (WWTF) using the remaining

1,150 gpd portion of the approved allocation established for the proponent's Cedar Hill office development project. In its comments, MassDEP has indicated that the Westerly WWTF may be operating at or near capacity, and does not have sufficient capacity to accept any additional wastewater flows. The FEIR should identify how the remaining balance of wastewater flow from the proposed Duie Pyle warehouse (approximately 1,800 gpd) will be managed.

### Full Build Development Scenario

The cumulative impacts associated with the Full-Build Scenario are significant, and exceed many of the MEPA review threshold for requiring the mandatory preparation of an Environmental Impact Report (EIR). These cumulative impacts are summarized in the table below, which was presented in the DEIR. The FEIR should update the information provided in this table to include additional information pertaining to the Hayes, Copley and Commonwealth development projects. Where appropriate, the information for the Hillside at 495 Center project reflect the cumulative impacts resulting from both Phases 1 and 2 of the project.

### **Full-Build Development Scenario**

	Hillside at 495 Center	Bartlett at 495 Center	Devonshire at 495 Center	Beacon at 495 Center	Cedar Hill	Hayes	Copley	Commonwealth	Totals
Project Area (Acres)	175	32	47	80	7	67	101	10.6	490
Office, Warehouse OFC, WH (sf)	1.5 mil - OFC 377,000 WH	220,000 WH	600,000 OFC	600,000 OFC 87,000 Retail	95,000 OFC	177,500 WH	200,000 WH 20 Res Lots	23 Res Lots	2.8 mil OFC 974,500 WH 87,000 Retail 43 Res Lots
Parking Spaces	5,846	213	2,120	3,270	340	222	TBD	TBD	12,211
Disturbed Area (Acres)	111	16	31	40	5	TBD	TBD	TBD	203
Impervious Area (Acres)	92	10	18	31	4	TBD	TBD	TBD	154
Undisturbed Area (Acres)	79	16	16	40	1	TBD	TBD	TBD	151
Wetland Buffer Disturbed (sf)	TBD	TBD	TBD	TBD	None	TBD	0	TBD	0
Wetland Alteration (sf)	TBD	0	500	2,300	None	TBD	TBD	TBD	2,800
Riverfront Area	YES	None	None	YES	None	None	0	TBD	0
Endangered Species	None	YES	None	None	None	YES	0	TBD	0
Water Use (gpd) Municipal, Private	128,400 Muni	4,900 Muni	62,000 Muni	57,200 Muni	7,260 Muni	3,905 Muni	TBD	TBD	268,065
Wastewater (gpd) Municipal, Private	116,625 Muni	4,500 Muni	56,400 Muni	52,000 Muni	4,350 Muni	3,550 Muni	7,500	TBD	241,425
Length of Sewer Mains (lf)	5,288	1,400	1,800	TBD	Tie -in	TBD	TBD	TBD	8,488
Length of Water Mains (lf)	8,500	450	4,000	TBD	Tie -in	TBD	TBD	TBD	12,950
Vehicle Trips Per Day (vtd)	18,400	1,160	5,300	11,400	1,300	2,990	TBD	TBD	41,650

*Water Supply*

The FEIR should identify the source(s) of potable water supply to serve the development projects included in the Full-Build Scenario described elsewhere in this Certificate, and their impacts on their respective water supply systems. The proponent should commit to employing efficient water conservation technologies for this and other projects in the Full-Build Scenario including water saving devices and low flow toilets and appliances.

*Wastewater*

Under the Full-Build Scenario, the proponent's development projects will generate a total of approximately 245,000 gpd of wastewater flow. According to the information provided in the DEIR and the comments received from MassDEP, Marlborough's Westerly WWTF has a permitted treatment capacity of 2.89 million gallons per day (MGD) which is allocated between the City of Marlborough (2.1 MGD) and the Town of Northborough (0.8 MGD) through an inter-municipal agreement (IMA). The City of Marlborough has reached its allocated wastewater treatment capacity and has enforced a moratorium on new sewer connections. The Town of Northborough has approximately 250,000 gpd of available wastewater treatment capacity remaining in its allocation. MassDEP has expressed concern with the proponent's ability to sewer the development projects located in Marlborough and Northborough within their respective municipal allocations, relative to the permitted treatment capacity of the Westerly WWTF.

The FEIR must address MassDEP's comments regarding the wastewater treatment needs for each of the proponent's development projects under the Full-Build Scenario and the existing capacity limitations of Marlborough's Westerly WWTF. The FEIR should demonstrate that the proposed methods for the discharge and treatment of the wastewater flows generated by the Full-Build Scenario are feasible. This should include an explanation of how the wastewater flows have been allocated to date, and how they will be allocated amongst all of the proponent's development projects. For each development project, the proponent should identify the project's location; its estimated wastewater flows; and the project's municipal allocation impacts. The FEIR should demonstrate that both the Town of Northborough and the City of Marlborough concur with the proponent's wastewater treatment allocations. The FEIR should identify any wastewater collection, conveyance and treatment capacity constraints, if any, associated with the proponent's proposed wastewater treatment plan for each of the development projects under the Full-Build development scenario.

I am requiring that the FEIR consider and analyze wastewater treatment alternatives to eliminate or significantly reduce the need for serving the estimated wastewater flows from Phase 2 of the Hillside at 495 Center project, as well as the Full-Build Scenario. The proponent may have to make fundamental changes to one or more individual project designs in order to accommodate state permitting requirements (e.g., reduce the size of the project(s), mitigate additional flows through Inflow/Infiltration removal, or find practicable alternatives for serving



the project's wastewater flows). The proponent's analysis of wastewater treatment alternatives should include further evaluation of suitable wastewater disposal sites within one or more of the proponent's development parcels located in Northborough and Marlborough; the use of appropriate wastewater recycling system technology as part of a groundwater discharge alternative such as that employed for a previously reviewed office development project in Hopkinton, the EMC Corporation Flagship Project (EOEA #11582); and the use of flow diversion such as the Lake Williams Pump Station wastewater flow diversion project. According to MassDEP, soil testing evaluations must be completed for all of the proponent's development parcels sites to rule out on-site treatment for any potential wastewater disposal site. Based on the information and analysis provided in the FEIR, I reserve the right to require further analysis of the proponent's proposed methods for wastewater management, and any mitigation for wastewater impacts deemed necessary.

### *Traffic*

The Certificate on the NPC required that the DEIR include an Area Traffic Planning Study, prepared in conformance with the EOEA/EOTC Guidelines, for both the Hillside at 495 project and the Full-Build Scenario, then described as four development parcels (Hayes Parcels, Bartlett at 495 Center, Cedar Hill Parcel, and Devonshire at 495 Center). The DEIR contains a Traffic Planning Study that assesses the anticipated transportation growth and impacts associated with region-wide growth over the next 20 years rather than the potential traffic impacts resulting from the proponent's development projects.

The FEIR should include a detailed discussion of the estimated traffic impacts resulting from the Hillside at 495 Center project (Phases 1 and 2), and the potential cumulative traffic impacts and required mitigation measures arising out of the proponent's development of the eight development parcels identified in the Full-Build Scenario described elsewhere in this Certificate. The proponent should consult with MassHighway in preparing this study. The proponent should also respond to the comments received from MassHighway.

While the Hillside at 495 Center project is anticipated to generate approximately 18,400 vehicle trips per day, and does not appear to require an access permit from the Massachusetts Highway Department (MassHighway), the cumulative traffic impacts associated with the Full-Build Scenario (approximately 41,650 vtd) may severely impact traffic operations at a number of state highway locations including: the Route 20/Bartlett Street intersection, the Route 20/Boundary Street/Hayes Memorial Drive intersection, and the I-495 interchange ramps at Simarano Drive. At a minimum, the FEIR must include a traffic study identifying the future No-Build and Build traffic conditions at these three state highway locations identified.

The FEIR should discuss the suitability of any signalization and geometric improvements, and any right-of-way (ROW) implications for the Full-Build Scenario. Existing truck volumes should be estimated from vehicular traffic counts. The FEIR should identify the proponent's coordination efforts with the Town of Northborough, the City of Marlborough and MassHighway to address traffic concerns within this area under the Full-Build Scenario. I continue to urge the

proponent to participate in any discussions and studies to evaluate the feasibility of traffic, transit, pedestrian, and bicycle improvements within this area with the Town of Northborough, the City of Marlborough, MassHighway, and officials from the Metropolitan Area Regional Planning Commission (MAPC) and the Central Massachusetts Regional Planning Commission (CMRPC).

### Construction Period Impacts

The proponent should require its contractors to use On-Road Low Sulfur Diesel (LSD) fuel in their off-road construction equipment that can increase the removal of particulate matter (PM) by approximately 25 percent beyond that which can be removed by retrofitting diesel-powered equipment. Exhaust from motor vehicles is a key component of ground-level ozone or smog, a contributor to global climate change and can cause serious health effects. In addition, very fine particles emitted from diesel and gas engines are lung irritants and can trigger asthma attacks and more serious health conditions. The proponent should ensure that vehicles at the facility comply with the Massachusetts Anti-Idling Law (M.G.L. c. 90, ss. 16A) and with MassDEP Air Pollution Control Regulations (310 CMR 7.11(1)(b)) which limit vehicle idling to no more than five minutes in most cases. All construction-related refueling and equipment maintenance activities should be conducted under cover on impervious surface areas with containment, and outside of any wetlands resource areas, endangered species habitat areas, residential areas and wellhead protection areas. The proponent should also commit to specific Transportation Demand Management (TDM) measures that can be implemented during construction.

### Mitigation/Section 61 Findings

The FEIR should include a separate chapter summarizing proposed mitigation measures. This chapter should also include draft Section 61 Findings for each state agency that will issue permits for the project. The draft Section 61 Findings should contain clear commitments to implement mitigation measures, estimate the individual costs of each proposed measure, identify the parties responsible for implementation, and a schedule for implementation.

### Response to Comments


The FEIR should respond to the comments received on the DEIR to the extent that the comments are within MEPA jurisdiction. I recommend that the proponent use either an indexed response to comments format, or a direct narrative response. The FEIR should present any additional narrative or quantitative analysis necessary to respond to the comments received.

### Circulation

The FEIR should be circulated in compliance with Section 11.16 of the MEPA regulations and copies should also be sent to the list of "comments received" below and to Northborough town officials and Marlborough City officials. A copy of the FEIR should be made available for public review at the Northborough and Marlborough Public Libraries.

Based on a review of the information provided by the proponent and after consultation with the relevant public agencies, I find that the potential impacts of the Hillside at 495 Center project as currently proposed, and the Full-Build development scenario, continue to raise a number of issues and concerns pertaining to the project's impacts to wastewater and traffic. I strongly encourage the proponent to work closely with MassDEP and MassHighway to address the issues of wastewater and traffic for the Hillside at 495 Center project as currently proposed, and under the Full-Build development scenario. The FEIR will need to describe its resolution of these issues.

March 29, 2007  
Date

  
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Ian A. Bowles, Secretary

Comments received:

03/05/07	Water Supply Citizens Advisory Committee (WSCAC) - MWRA
03/08/07	Department of Environmental Protection - CERO
03/26/07	Department of Environmental Protection - CERO
03/27/07	Massachusetts Highway Department (MassHighway)

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