

# CONSERVATION **MATTERS**

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# SAVING CAPE COD'S WATERS

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# SAVING CAPE COD'S WATERS

EcoPhotography

**CLF is fighting to clean up the Cape's ailing waters before nitrogen pollution pushes them past the point of no return.**

**I**magine the kind of summer day we New Englanders wait for all year – a light breeze, an azure sky, temps in the low 80s, and, best of all, low humidity. Coolers are stuffed with snacks and sandwiches, beach chairs stacked in trunks, and kids corralled into waiting cars for the traffic-jammed ride to their favorite Cape Cod beach, where the water has warmed just enough to entice even the least hardy among us.

Such a day is the stuff of cherished summer memories and Cape Cod tourism brochures. But there's an ugly catch to this idyllic scene: The Cape's saltwater bays are in crisis, their water quality degraded severely by excess nitrogen from wastewater. The region's septic systems – which serve 85 percent of households – aren't designed to eliminate nitrogen, which moves through the Cape's uniquely porous soil and seeps into local waters.

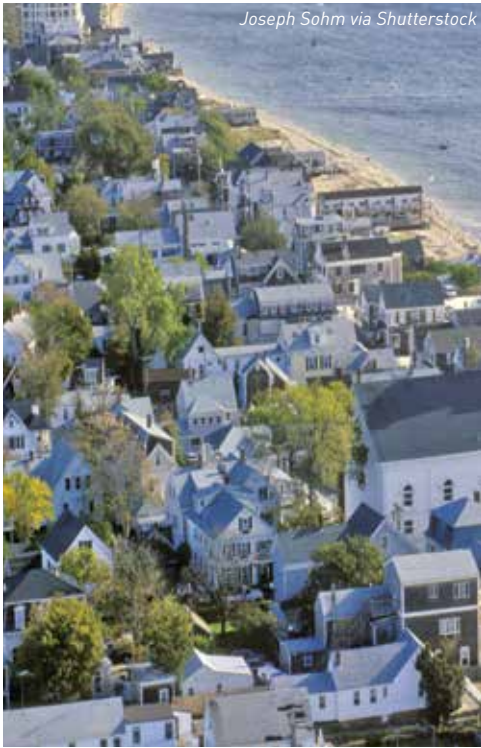
"Nitrogen acts like a fertilizer, causing massive algae outbreaks, including blue-green algae, that float on the water's surface," says Christopher Kilian, CLF Director of Strategic Litigation. The outbreaks can sicken people, plants, and animals and make the Cape's bay beaches and freshwater ponds unsafe for swimming, boating, and shellfishing. Beach closures due to algae outbreaks and high bacteria levels have become an all-too-frequent in recent years, while local swimming holes long beloved by year-round and summer residents alike are today often off-limits to their children and grandchildren.

Nitrogen pollution on the Cape is hardly a secret, says Kilian. Scientific reports show it has been getting worse year after year for decades now. The solution is also well known: Fix the region's septic and wastewater treatment systems, and do it now.

The consequences of inaction are pretty well accepted, too: Beyond the devastating impacts to plants, fish, and wildlife, the growing "brown-slime" economy (a term coined by the region's chamber of commerce) could overpower the Cape's tourism economy and the millions of dollars it pumps into the region every year. After all, it's New England, and beach lovers could easily choose to visit one of the region's other coastal areas where the waters are clean. If the tourists go, so do the summer jobs, retail and restaurant sales, rentals, and all the ancillary businesses that depend on them – along with housing values in both the seasonal and year-round markets.

But there is good news. Thanks to a lawsuit filed by CLF against the Environmental Protection Agency (EPA), in 2015 the Cape Cod Commission updated a 30-year-old Areawide Wastewater Management Plan – called a Section 208 plan for the statute in the federal Clean Water Act that mandates it [SEE SIDEBAR, PAGE 5]. The updated plan outlines the legally required actions the Cape's 15 towns must take to literally clean up their act.

Three years later, however, progress on implementing the plan has been "slow and fragmented," says Kilian. "Some towns are making progress, and they deserve



**PHOTOS:** Wastewater treatment infrastructure on Cape Cod hasn't kept pace with development [LEFT]. More than 85 percent of homes here treat waste through septic systems. Nitrogen from that waste seeps through the Cape's sandy, porous soil and into its waters, causing toxic algae outbreaks [ABOVE] that sicken people, pets, plants, and wildlife.

credit, but mostly what we're seeing are fits and starts – incremental progress here and then a setback there. There's nothing comprehensive or aggressive happening right now."

Andrew Gottlieb, Executive Director of the Association to Preserve Cape Cod, agrees it has taken some time for many residents to understand the scope and urgency of the problem. "If you go out on these waters on a sunny, blue-sky day, everything looks good," he says. "Because much of the problem lies below the water's surface, it's typically unseen by those who aren't on or in the water on a regular basis."

The aha moment, Gottlieb says, "comes when we have a day of cloudy weather, a fish kill, or a floating algae mass that literally brings the problem to the surface."

He points to CLF's litigation and the resulting publicity around the updated Areawide Wastewater Management Plan as helping to drive awareness among residents. "They're recognizing that there's a responsibility to take action here, and that it's not at the towns' discretion to just endlessly put it off."

Gottlieb can point to half a dozen towns making important strides and thinking creatively about how to fix the problem

in their community. "I can also point to a suite of communities that are spinning their wheels," he says. A major sticking point for all is the price tag for addressing the issue.

That price tag is significant – up to \$8 billion by some estimates. "We're talking on the scale of a Boston Harbor cleanup in terms of cost," says Gottlieb. "But we have to spread that across 250,000 people while Boston Harbor was spread across 2.5 million. That has dampened a lot of the early municipal actions."

Like Boston Harbor, the Cape's pollution problem didn't get to this dire stage

## THE CAPE IS NOT ALONE: NUTRIENT POLLUTION AFFECTS ALL OF NEW ENGLAND

Tragically, blue-green algae outbreaks aren't only to be found on Cape Cod – they're now commonplace around many of New England's legendary waters. Years of unmitigated pollution are taking their toll on New Hampshire's Great Bay, Vermont's Lake Champlain, Rhode Island's Narragansett Bay, and more.

Just as on the Cape, these waters all carry excess levels of nitrogen or phosphorous, a problem known as nutrient pollution. While the Cape can trace its issues to septic systems and porous, sandy soil, in other parts of New England this excess nitrogen and phosphorus comes from fertilizer running off farms and lawns as well as animal waste from confined animal feeding operations.

CLF is leading the fight against this growing but controllable threat to clean water and all who depend on it. State by state, CLF is challenging current regulations that allow nutrient pollution to continue, pushing for stricter controls on the sources and stronger enforcement of the law.

Addressing this solvable problem requires good science-based planning, financial investment, individual commitment, and political will. CLF is working to ensure strong protections so that the choice for cities and towns is not one for or against clean water but rather how to act quickly and cost effectively to preserve this most fundamental source of health and prosperity.





**PHOTOS:** Pleasant Bay [ABOVE] and Wychmere Harbor [OPPOSITE PAGE] are being put at risk by the failure of two popular Cape Cod resorts to curb their nitrogen pollution through improved wastewater treatment systems.

overnight, and “it’s not going to get cleaned up overnight,” says Gottlieb. After all, Boston’s Deer Island wastewater treatment plant wasn’t fully operational until 27 years after CLF filed the landmark lawsuit that sparked the Harbor cleanup.

But everyone recognizes that the Cape does not have 30 more years to solve its septic problem. Too much is at stake.

**This is a collective problem that crosses town lines. It needs to be solved through collective action.**

— Christopher Kilian,  
Director of Strategic Litigation

“This is threatening the entire Cape economy – not to mention the natural resources that make the Cape a place where people want to live and visit,” says Kilian.

The way forward, say Gottlieb and Kilian, is for towns to work together to develop solutions and spread out the costs. “This is a collective problem that crosses town lines, and it needs to be solved through collective and regional action,” says Kilian. “Individual action will result in

inconsistent programs and standards, economic inefficiency, and continued delays.”

Kilian also cites the need for state-level action to help alleviate the cost burden to towns. Wastewater treatment plants and septic systems are all subject to state laws that dictate the amount of nitrogen pollution they can emit. The Massachusetts

Department of Environmental Protection (DEP) is charged with permitting treatment plants, but they have done little to enforce or update those permits to reflect the current reality facing the Cape’s waters.

“It’s DEP’s job to help towns figure this out,” Kilian says in frustration. “What else do they exist for if not to protect the environment?”

With state as well federal players absent, active residents, town officials, and

organizations like Gottlieb’s Association to Preserve Cape Cod are working town by town to spur action on the ground.

Mashpee, Sandwich, and Barnstable, for example, have signed an agreement to work together to curb nitrogen pollution in Popponesset Bay – creating a potential model for cross-community cooperation. Orleans voters have funded the installation of new sewer lines for its core commercial district. Other towns have also moved to fund upgrades to treatment plants, collection systems, or sewers.

Meanwhile, a bill currently under consideration in the state legislature would create a new tax on short-term rentals on the Cape and Islands. The revenue generated would go into a fund to help offset the high cost of the critical infrastructure upgrades that are needed.

Concerned by the generally slow pace of action at the town level, CLF, too, has been exploring options, including taking a closer look at some of the region’s biggest polluters – its tourist resorts.

In June, the organization announced its intention to sue Wequassett Resort and Golf Club and Wychmere Beach Club over their individual nitrogen pollution.



Both located in Harwich, these well-known resorts' on-site wastewater treatment systems are no more effective at stopping pollution than the average homeowner's septic tank. The leaching pits that collect the resorts' waste let too much nitrogen escape into nearby bays, threatening the very tourism economy on which these businesses are built.

The Wequassett and Wychmere have an opportunity to set an example for other corporate polluters on the Cape. "There is no regulatory safe harbor for these businesses just because a town itself hasn't yet moved forward with action," says Kilian. "These resorts are subject to clean water laws, and, as major drivers of nitrogen pollution in the town, we want to incentivize them to proactively become part of the solution."

The summer tourism season currently underway serves as a reminder of both the issue's urgency and the fragility of an economy based on clean, healthy waters. The tourists and summer people on whom nearly 50 percent of the Cape's annual economy relies place a tremendous strain on the region's already-failing waste treatment systems. Many more people means much more nitrogen leaking into bays and streams. That, in turn, leads to more beach closures and smelly, harmful algae outbreaks.

"It's a destructive cycle that must stop," says Kilian. "We can't allow the Cape's waters to degrade any further." Because no one benefits if those glorious blue-sky days spent playing and swimming on the Cape's white sand beaches disappear, revived only as nostalgic stories told on the coldest winter nights. ♦

## DIG DEEPER >

Find out how you and your neighbors can help prevent nutrient pollution in your community. Go to [www.clf.org/outbreaks](http://www.clf.org/outbreaks).

## BREATHING NEW LIFE INTO AN OLD STATUTE

You're not alone if you've never heard of a Section 208 plan. It's one of many overlapping provisions in the 1972 Clean Water Act. For years, Section 208 plans were the primary mechanism by which EPA addressed water quality issues broadly. Then, in the mid-1980s, Congress defunded EPA's ability to enforce Section 208, leaving hundreds of completed plans to gather dust across the country.

When CLF's Kilian began exploring legal options for cleaning up the Cape's waters, he found that the region had approved a Section 208 plan back in 1977. That plan was still in effect legally, though it was hopelessly out of date for addressing the region's current nitrogen pollution issues.

Kilian realized that the Clean Water Act required that federal and state monies intended to address water quality issues on the Cape could be spent only on initiatives specified in the existing Section 208 plan. But because the plan was so out of date, Kilian and CLF argued in court, any action EPA took today to manage water quality on the Cape was essentially violating the law.

The goal, says Kilian, was to force an update of the plan to address the region's nitrogen pollution. That would then create legal accountability for meaningful action moving forward. The judge agreed, ordering that the Cape's Section 208 plan be updated in 2014.

Today, the precedent set by CLF is being used by advocates across the country to revive Section 208 plans and force long-delayed action on water pollution in other communities.



# saving

We refuse to let this magnificent species go extinct on our watch. We must act now before it's too late.

— ERICA FULLER, SENIOR ATTORNEY

## THE PROBLEM

North Atlantic right whales teeter on the brink of extinction. Hunters gave the iconic whale its name because it was the “right” whale to kill – docile, slow moving, and feeding close to the water’s surface. From a precolonial population believed to be more than 20,000, right whales were hunted nearly to extinction by the early 1900s. When Congress passed the Endangered Species Act in 1973, right whales were one of the first species added to the “endangered” list – and they’ve stayed there ever since.

Now, North Atlantic right whales face another crisis of human making: Collisions with ships and entanglements in fishing gear. Today, the species is one of the most endangered in the world, with fewer than 450 whales remaining. The devastating loss of 17 whales last year alone – and no new calves reported born this year – has prompted a renewed urgency to save North Atlantic right whales before it’s too late.

The federal government is required by law to protect right whales. But the measures implemented by regulators over the last few decades have not gone far enough. What’s more, the National Marine Fisheries Service recently opened up 3,600 square miles of important whale habitat to deadly commercial fishing gear.

## CLF IN ACTION

CLF has worked to protect right whales since the 1970s, when the organization stopped oil and gas drilling within whale habitats. More recently, CLF fought to protect vital habitats, such as Cashes Ledge, from commercial fishing.

In addition, when Deepwater Wind began construction on its Block Island Wind Farm in Rhode Island, CLF worked with the company to adjust its schedule to minimize impacts on migrating whales. CLF and its partners also reached an agreement with Deepwater Wind to limit potentially harmful preconstruction activities during site surveys for wind projects in federal waters off the coasts of Massachusetts and Rhode Island.

Solutions to today’s crisis already exist: ropeless fishing gear, stricter ship speed limits, increased monitoring and reporting, and closures of commercial fishing grounds when right whales gather to feed and mate.



# right whales, right now

*Photo: Florida Fish and Wildlife Conservation Commission, taken under NOAA research permit #15488*

But with federal regulators dragging their feet instead of taking immediate action to stem whale deaths, CLF is pushing to enforce the law and compel urgent action before it's too late.

Earlier this year, CLF and Earthjustice together filed a lawsuit aimed at forcing the National Marine Fisheries Service to fulfill its legal obligation to protect right whales from the threats posed by commercial fishing. And, in late May, the organization sued the Fisheries Service again for violating the Endangered Species Act and failing to consider how the opening of those 3,600 acres of habitat would impact right whales.

## NEXT STEPS

As CLF's lawsuits wind their way through federal court, New England's ocean is becoming an even busier place for migrating whales. Both Massachusetts and Rhode Island recently announced plans to contract with offshore wind projects to boost the production of clean, local energy in each state. CLF supports this progress toward ending New England's dependence on dirty fossil fuels and will be working with regulators and developers to ensure that these critical projects prioritize the safety of right whales during their site assessment, construction, and operation. ♦

**STAY UP TO DATE** with our campaign to save North Atlantic right whales at [www.clf.org/rightwhales](http://www.clf.org/rightwhales).

**GET INVOLVED** Call your local and federal representatives. Ask them to fund efforts to replace traditional fishing gear with ropeless gear to reduce deadly entanglements.

## SPREAD THE WORD

CLF is partnering with Bow Seat Ocean Awareness Programs to raise awareness about North Atlantic right whales and the Gulf of Maine. Together, we're launching a special contest for young New England artists, thinkers, and activists who are concerned about the future of our ocean and the many creatures, including right whales, that depend on it. The contest will launch this fall. To learn more about the contest and how your child, grandchild, or students can get involved, visit [www.healthywhale.org](http://www.healthywhale.org).





# Jen Duggan



The new Vice President and Director of CLF Vermont brings a track record of holding polluters accountable and a passion for working at the intersection of the environment and public health.

After working as general counsel for the Vermont Agency of Natural Resources, I also understand the tensions agency leadership and staff have to balance and the limited resources they have to do their jobs.

and here in Vermont gives me a unique frame to tackle these challenges.

## 1 You grew up in Louisiana near Cancer Alley. How did that shape your career?

Driving between my childhood home near New Orleans and Baton Rouge, I would see the dozens of chemical plants and oil refineries that lined this stretch of land. The sight, the smell, and even the taste of this place left a big impression on me. Even as a young girl, I could see the disproportionate burdens these communities were forced to bear.

That made me passionate about the intersection of public health and the environment and motivated me to go to law school. As an attorney for the Environmental Integrity Project, I was fortunate to work with Baton Rouge residents to improve a clean air permit for a large refinery. It was satisfying to come full circle and work alongside the community.

## 2 You've worked both inside and outside of government – what has that taught you about how to accomplish advocacy goals?

I deeply respect the scientists, engineers, lawyers, and other agency employees who dedicate their careers to public service.

When it comes to building powerful and effective advocacy campaigns, this perspective is incredibly helpful. It has helped to make me ready to carry forward CLF's reputation as problem solvers and creative thinkers who aren't afraid to take on big challenges.

## 3 You've spent much of your career fighting for clean water. How do you hope to make a difference as head of CLF Vermont?

Water is fundamental to human life and has played such an important role throughout my life. One of my earliest memories is sitting on a dock in south Louisiana as my grandpa pulled up his boat and unloaded fresh oysters. We all sat together in the sunshine eating oysters straight from the water, my feet dangling over the bayou.

In Vermont, we're fortunate to have Lake Champlain and beautiful lakes, rivers, and forests, but we're facing tough challenges protecting them. We're also increasingly aware of the fragility of our drinking water resources. My experience working on clean water issues at the national level with the Environmental Integrity Project

## 4 What drew you to New England and to Vermont in particular?

I attended Vermont Law School because of its commitment to public interest law and the environment. Once I moved here, it just felt like home. After graduating, I took a job in D.C. with the Environmental Integrity Project, but I was plotting my return to Vermont from the day I left. Five-plus years ago, I had the opportunity to move back, and it feels great to put down roots with my family here.

Vermonters embody the democratic spirit. There's a strong sense of community here and incredible public participation in decision making. We're the "brave little state," often leading on important issues.

## 5 How do you and your family relax?

We live in Montpelier next to Hubbard Park, so we're there exploring almost every day. We see moose tracks, beautiful birds, and, in the spring, an amazing vernal pool comes alive. It's really special having a place like this right in town.

We also tap sugar maple trees with our kids and neighbors every year. We boil the sap together to produce our own maple syrup. It's a great way to get outside and reconnect with neighbors after the long winter. ♦



*MARK YOUR CALENDARS!*

# SAVE OUR SHORES 2018

Join CLF members & friends on five walks across New England shores with our experts as your guides.

We'll tour beautiful, but threatened, shorelines and discover how, together, we can make a difference for New England's waters – and for the people, wildlife, and communities that depend on them. After each walk, we'll mingle and share ideas during a casual reception.

## **SUNDAY, SEPTEMBER 23**

Massachusetts / Boston Harbor & Waterfront

Vermont / Lake Champlain

New Hampshire / Atlantic Coast & Little Harbor  
Odiorne State Park

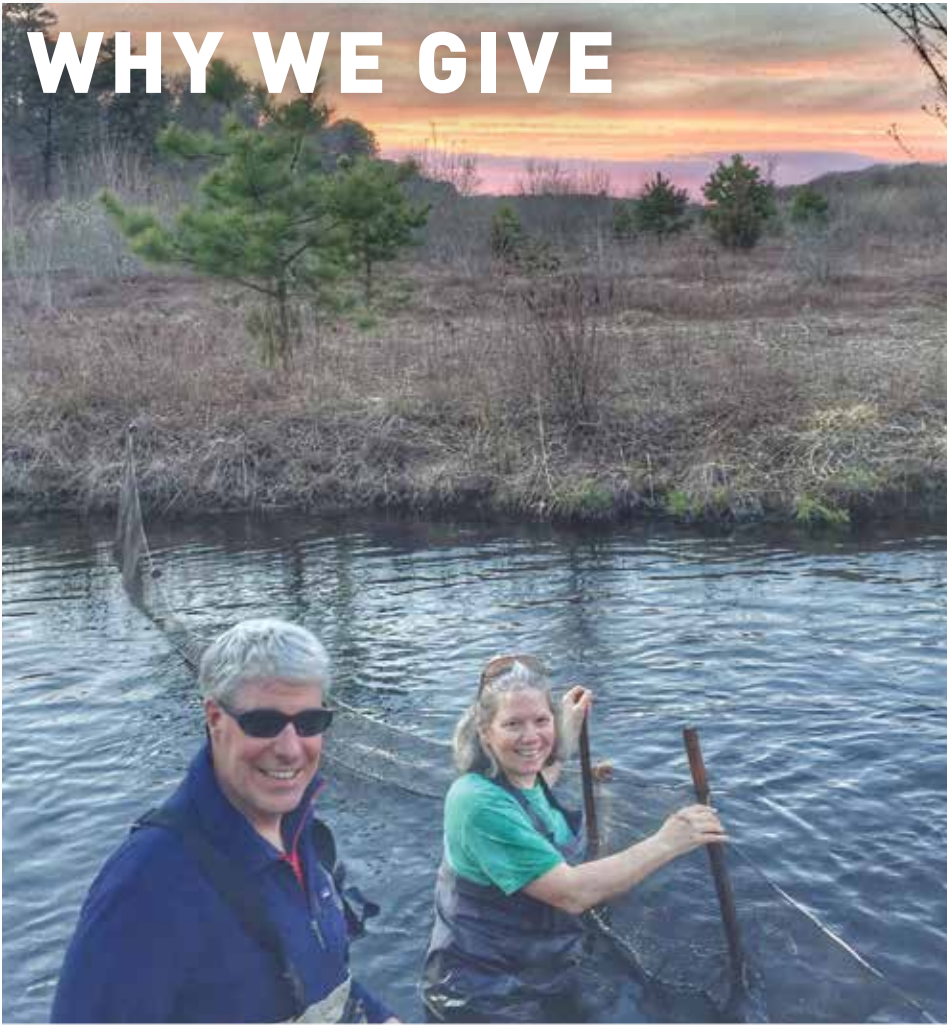
Maine / Southern End of Grand Beach  
Camp Ellis

## **SUNDAY, OCTOBER 21**

Rhode Island / Goddard Memorial State Park

**LOOK FOR AN INVITATION IN YOUR MAILBOX SOON!**

# WHY WE GIVE



Chris Neill and Linda Deegan waded into Falmouth's Coonamessett River. As volunteers, they tag herring and collect water samples to document changes to Cape Cod habitats and water quality. *Photo: Andy Jones*

## Linda Deegan & Chris Neill

*Falmouth, MA | Members since 2010*

“ During the nearly 30 years we have lived in Falmouth, nitrogen pollution has transformed our estuaries from eelgrass-filled bays with scallops and winter flounder to less attractive and less diverse algae-choked waters. We study these changes in our lives as research scientists.

We believe that occasional and well-considered legal actions can contribute to solving this complex problem.

**Our donors inspire us to never give up because so much is at stake. Hear more from Linda and Chris and other CLF supporters at [www.clf.org/whywegive](http://www.clf.org/whywegive). We hope their words will inspire you to support our efforts.**

CLF has played a key role by forcing action to clean up nitrogen pollution through its detailed knowledge of state and federal laws and its willingness to take legal steps when needed.

We want our support of CLF to speed up efforts to reduce nitrogen pollution and hasten the day when we can wade out from shore into eelgrass meadows, as we did when we first arrived on Cape Cod. ”

## JOIN THE CHAMPIONS CLUB

[clf.org/champions](http://clf.org/champions)

Be part of a community of committed members whose ongoing, monthly support provides dependable funding for our work.

### OTHER WAYS TO GIVE

Want to give a one-time donation? Or find out if your company will match your gift? Want to give an honorary or gift membership? Or learn more about planned giving?

You can do it all online in a few clicks. It's that easy.

So come visit us online and make your donation today.

[www.clf.org/donate](http://www.clf.org/donate)

Contact us today to learn more about giving to CLF.

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Photo: EcoPhotography

# AROUND CLF

## MAINE

With the Northern Pass transmission project rejected by New Hampshire regulators, the spotlight is now on the New England Clean Energy Connect proposal, which would carry Canadian hydroelectric power to Massachusetts through Maine. CLF is actively engaged in Maine and Massachusetts to ensure the project moves forward only if the benefits of replacing fossil-fuel-generated power with hydroelectricity outweigh the impacts of the transmission project on Maine's communities, natural resources, and forest habitats.

## MASSACHUSETTS

CLF is appealing the Massachusetts Department of Environmental Protection's decision to approve an expansion of the Wheelabrator Saugus Ash Landfill. Located in a protected tidal marsh, it is the most dangerous landfill in Massachusetts, and it puts the

health of nearby residents at risk. CLF's appeal aims to stop the dumping of an additional 560,000 tons of toxic ash at the site.

## NEW HAMPSHIRE

CLF and Toxics Action Center are holding Casella Waste Systems accountable for polluting the Ammonoosuc River. The company's Bethlehem Landfill has been violating the Clean Water Act by discharging pollutants, including 1,4 dioxane, a potential carcinogen, into the river. CLF also is supporting Bethlehem residents as they oppose Casella's continued attempts to expand the landfill.

## RHODE ISLAND

CLF has been fighting alongside environmental advocates and local communities for almost three years to stop Invenergy from building a fossil fuel power plant in the heart of

Burrillville. The unnecessary – and unwanted – project would prevent Rhode Island from reaching its goals for cutting carbon pollution and devastate a critical wildlife corridor. A hearing to decide whether to grant Invenergy a permit is currently underway at the Energy Facilities Siting Board.

## VERMONT

Lake Champlain has been plagued by toxic algae outbreaks that will only get worse without urgent action by the State to curb water pollution. This past legislative session, CLF fought for long-term funding for clean water projects, but the state legislature once again failed to invest in a better future for the lake. Despite this setback, CLF's Lake Champlain Lakekeeper is committed to working with local communities to advocate for sustainable funding and sensible regulations to save Vermont's iconic body of water.

**TAKE ACTION!**  
Your Voice Matters

Speak up and take action on the issues that matter to you across New England. Sign up for CLF emails so you'll be the first to know when we need your help.  
[www.clf.org/signup](http://www.clf.org/signup)

Other ways to keep up to date:  
· CLF's blog: [clf.org/blog/](http://clf.org/blog/)  
· Twitter: @clfb  
· Facebook: [facebook.com/TheCLF](https://facebook.com/TheCLF)



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**LETTER FROM THE PRESIDENT**



In summertime, water becomes the organizing element of my life, or at least of my free time. The sensory delights of

being on New England waters – the awe of a night passage under full sail, the perfect cast of a fly onto a serene river pool, the cacophony of children cavorting on an otherwise quiet lake, the reassuring diesel clatter of a lobster boat at dawn – these are moments of sublime beauty that define our region and our identity.

But beneath the aesthetic and wondrous, New England's waters are among the hardest-working of our natural resources, providing the water we drink, the seafood on our tables, and the experiences driving a regional tourist and recreation economy worth many billions.

Without the magnificent waters of the Cape and Islands, tens of thousands of tradespeople, hospitality workers, and their supplying vendors would be idle. Without a flourishing ocean, fleets of whale-watching and fishing vessels would be destined for the scrap heap, their crews left unemployed. Without a resplendent Lake Champlain, hotels and house rentals would sit empty and property values across the area would plummet.

We needn't pause in our rhapsodizing to recognize that both our survival and the prosperity of future generations of New Englanders depend – economically and culturally – on the health of the waters and marine resources providing these services and the public's ability to access them.

That's why CLF is launching a new campaign to restore water quality and eliminate harmful nitrogen pollution on Cape Cod bays.

It's why, from Lake Champlain to Mashapaug Pond in Rhode Island, we are working to stop the pollution feeding a dramatic rise in toxic blue-green algae outbreaks.

And it's why we are pushing to ensure that the critically endangered North Atlantic right whale not only survives but thrives.

We each connect personally to New England's waters: for recreation and relaxation, livelihood and revitalization. This summer, let's not forget the critical fights ahead to ensure that our waters are restored and protected – not just today, but for the generations to follow.

Sincerely,

Bradley Campbell  
President

**Bradley Campbell**  
President

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