

# CONSERVATION **MATTERS**

THE JOURNAL OF CONSERVATION LAW FOUNDATION | [www.clf.org](http://www.clf.org)

## **HOLDING BIG OIL ACCOUNTABLE**

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# BIG OIL ON TRIAL

BY ASHIRA MORRIS

**D**arrèll Brown drives down Providence's Allens Avenue several times a week. On both sides of the busy road, Shell Oil's massive oil storage terminal looms. Each of its squat white tanks reaches 50 feet high and stretches even wider. The sight of them serves as a stark reminder of the risk of pollution from the tanks every time it rains – and the silent threat of the catastrophic damage they could unleash when hit by a powerful storm.

"It's an intimidating stretch of road," Brown says. "It feels dangerous."

As vice president for CLF's Rhode Island advocacy center, Brown actively works to hold Shell responsible for the harm its facility could cause and to prevent a massive spill in the future. CLF has sued Shell Oil for failing to accurately report what pollutants its oil storage terminal releases into the Providence River and for neglecting to prepare its facility for the impacts the company knows the climate crisis will bring.



**“It’s simply outrageous how ExxonMobil, Shell, and other companies have ignored the climate science and risks.”**

— BRAD CAMPBELL,  
CLF PRESIDENT

Despite the oil giant’s attempts to get the lawsuit dismissed, the case is moving forward. It marks the first time a private fossil fuel entity will need to answer fully for its knowledge of climate change and its risks.

### **“It’s Not a Coincidence”**

The oil terminal in Providence sits at sea level on filled land in the Washington Park neighborhood, a diverse working-class community. While the entire Narragansett Bay and surrounding area would be impacted by an oil spill, the people living closest to the terminal endure its harms already: worse air quality, respiratory illness, and noise pollution from huge trucks going in and out of the facility.

“There’s a sense of powerlessness in the neighborhood,” says Brown. “There’s the community, and then there’s this big oil company with lots of money. Black and Brown communities are disproportionately affected by this kind of pollution. It’s not a coincidence.”

It’s not just Washington Park residents who live with the daily risks of pollution and looming threat of an oil spill. Across New England, oil and gas company terminals and storage tanks are often located in environmental justice neighborhoods: communities of color, low-income communities, working-class communities. And Big Oil’s operation of those terminals

**PREVIOUS PAGE** Shell Oil’s Providence terminal spans heavily industrialized Allens Avenue – with the Providence River bordering the facility on one side and the Washington Park neighborhood on the other. [PHOTO: ECOPHOTOGRAPHY]

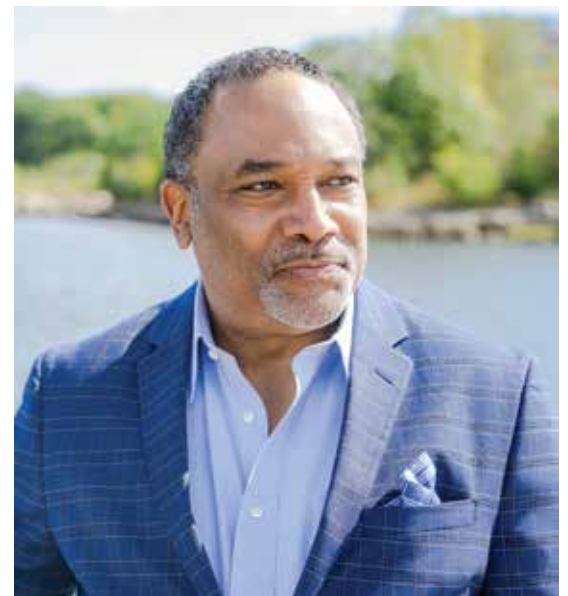
**THIS PAGE** (TOP) A sea wall in Providence issues a stark warning about climate change. (BOTTOM) CLF President Brad Campbell spearheaded the organization’s ground-breaking lawsuits against Big Oil for their failures to prepare their vulnerable facilities for climate impacts. [PHOTOS: WINDY FILMS; TOM KATES]

**OPPOSITE PAGE** CLF Rhode Island Vice President Darrèl Brown wants to see Shell Oil and other Big Oil companies held accountable for their failures, which put communities – especially Black and Brown communities – at risk. [PHOTO: WINDY FILMS]



**“They have really made profit more important than the lives of people and the health of the community.”**

– DARRÈLL BROWN  
VICE PRESIDENT, CLF RHODE ISLAND



leaves these communities vulnerable to severe weather and risks of pollution.

“It’s simply outrageous how ExxonMobil, Shell, and other companies have ignored the climate science and risks,” says CLF President Brad Campbell. “They’ve acknowledged it internally. But in the case of communities that are in harm’s way, the communities that have hosted these facilities for generations, they’ve essentially ignored those risks.”

Just north of Boston, ExxonMobil’s large petroleum storage facility poisons the Mystic River and its Everett community daily [SEE SIDEBAR ON PAGE 7]. South of Boston, the Sprague Energy terminal in Quincy – one of the most at-risk cities from rising seas, according to the Union of Concerned Scientists – could spill millions of gallons of oil into nearby waterways and neighborhoods. In New Haven, three oil companies’ facilities – Gulf, Magellan, and Shell – sit precariously on or near the banks of the city’s harbor.

CLF is taking the oil giants to court in partnership with residents from the Everett, Providence, New Haven, and Quincy communities they’re harming. These lawsuits are the first of their kind, suing Big Oil companies for climate risks and pollution under the Clean Water Act and hazardous waste law. CLF filed the first of its lawsuits against Exxon in 2017, with the others following in the years

since. Nationally, many states and local governments have filed lawsuits seeking to hold companies accountable for climate change risks and deceit. CLF’s are the first cases focused on climate resilience to head to trial.

the U.S. According to NOAA, the sea level off the Massachusetts coast is eight inches higher than it was in 1950. And it’s now rising even faster – about one inch every eight years.

**“There is complete lack of transparency regarding what Shell is doing, if anything, to address impacts such as sea level rise, precipitation, flooding, and the increasing intensity of storms at its Providence Terminal. We need to know that our large industries, including Shell’s Providence Terminal, are addressing these impacts and protecting the people who live, work, and recreate nearby from major spills and contamination caused by their facilities.”**

– Timmons Roberts | Providence, Rhode Island

### **It’s Not If, But When, the Next Big Storm Comes**

The looming danger these facilities pose is not a matter of if but when a big storm comes. Climate change – caused by the very petrochemical products the oil companies profit from – is intensifying hurricanes and pushing them into increasingly warm waters farther north in the Atlantic. We’re seeing everyday rainstorms grow more intense and frequent. Sea level rise is happening faster in New England than most other places in

Fossil fuel facilities like those in Providence, Everett, Quincy, and New Haven are not prepared for increasingly intense rainfalls and flooding, let alone a hurricane or tropical storm. The communities living near them have no assurance that they will be protected from the pollution that would swamp their streets if one of these facilities flooded.

We don’t have to imagine the damage a hurricane can cause, however. When Hurricane Harvey hit Houston in 2017, petrochemical facilities released

thousands of barrels of oil into the floodwaters that destroyed 100,000 homes. They spewed an estimated one million pounds of hazardous pollutants into the air, causing short-term nausea and long-term elevated risk of cancer in the residents forced to breathe them in. Harvey was a

already unsafe for fishing, swimming, and other recreation. With the 70% increase in intense rainfall already seen in New England, the risk of regular, ongoing harms from these facilities is also increasing.

climate. That means they also knew the danger they put communities in. Yet they have continued to prioritize their own profit over the health and safety of people and the planet.

Instead of spending money to protect coastal communities, they've spent 50 years and millions of dollars sowing climate doubt and deceit. Even now, as the companies try to talk up their green energy efforts – while still drilling for oil and gas – an Exxon lobbyist was caught on tape just last year discussing explicit strategies to stop climate action in Congress.

“The connection between that deceitful conduct and the risk to human health and the environment couldn't be clearer,” Campbell says. “Our lawsuits are an opportunity to remedy that wrong. And they are an important opportunity to reduce risk for our communities in harm's way.”

If CLF's lawsuits are successful, the oil giants will be forced to update their facilities for the climate risks they've known are coming.

“Over the years, Shell and other oil companies have been sowing doubt and deceit about what they know and when they knew it while failing to properly prepare their facilities for climate change,” Brown says. “What that tells me is that they have really made profit more important than the lives of people and the health of the community. There's no other way to say it.” ♦

**“I have done flood recovery work before, and I have seen that the amount of damage caused when an area is inundated is significant. Contemplating the level of damage that could occur if a facility storing hazardous chemicals were to be inundated makes me think that such facilities should take great care to ensure safety and avoid spills.”**

**– Tiffany Lufkin | New Haven, Connecticut**

Category 4 storm, but it would only take a Category 1 storm surge to flood the Shell terminal in Providence or Exxon's Everett facility. New Haven, meanwhile, suffered significant damage from Hurricane Sandy in 2012. But it would have been much worse had the storm surge coincided with high tide. Harborside neighborhoods could see even more destruction a second time.

It's not just a catastrophic flood from a hurricane or tropical storm that concerns community members, however. These facilities are also violating the Clean Water Act by risking regular toxic discharges, which get swept up in rain and floods into nearby waterways and surrounding communities. Those waterways are

## Deceit and Denial

In arguing their case in court, CLF's legal advocates will not only use the best science and engineering to show current climate risk. The legal team will also present each company's own statements – dating back decades – documenting their deep knowledge and consideration of climate change and severe weather risks in their operations.

Exxon scientists predicted as early as the 1970s that burning fossil fuels would cause the climate crisis we're currently living through. Several other Big Oil giants also conducted research into how fossil fuels harm human health and damage our

ExxonMobil's Everett, Massachusetts, terminal sits steps away from densely populated neighborhoods that would be devastated by a toxic flood. [PHOTO: ALEX MACLEAN]



# The Dirty Business of Handling Petroleum Products

*Here's a look at how just one oil giant – ExxonMobil – is violating the law by regularly releasing dangerous levels of toxic chemicals and other pollutants at its Everett, Massachusetts, facility.*

It all starts with dangerous chemicals called **polycyclic aromatic hydrocarbons** or PAHs.

Pollutants from petroleum products include these dangerous chemicals. The EPA tracks more than 100 PAHs. **At least seven are known to cause cancer.**

The EPA has identified 16 PAHs as priority pollutants especially harmful to people and the environment. All 16 are present at ExxonMobil's Everett, Massachusetts, Terminal.

Once they enter the environment, PAHs stay for a very long time, sometimes settling on the bottoms of rivers or lakes. Strong storms, like those expected due to climate change, can stir up the river bottom and bring those dangerous chemicals back to the water's surface.

People are exposed to PAHs through contact – swallowing, breathing, passing through skin. Anyone living or working near a waste or industrial site could be exposed to contaminated air, water, and soil.

**Their health impacts are alarming:** irritated breathing passages and eyes, nausea, and vomiting in the short term. Their long-term effects are

even more perilous: blood or liver abnormalities; skin, lung, bladder, and gastrointestinal cancers; cataracts, kidney and liver damage; DNA damage; cardiopulmonary mortality; and more.

PAHs are so dangerous that Exxon's Everett Terminal is allowed by law to discharge a maximum of 0.031 micrograms per liter for each chemical – daily.

Think of it like this: 1 *full* microgram per liter is like 1 sheet in a roll of toilet paper stretching from New York to London.

But ExxonMobil regularly violates its legal limit at its Everett Terminal. Take the PAH benzo(a)pyrene, for example. On several occasions, ExxonMobil has **released benzo(a)pyrene in levels 100% higher** than allowed by their Clean Water Act permit – in one case, 1,835% higher.

On average, ExxonMobil exceeds the legal limit for releasing any single PAH into local waters **by 1,666%**. That's nearly 18 times greater than the EPA has established as safe for these cancer-causing chemicals.

These discharges are regular. They are irresponsible. They are illegal. And they are catastrophic for the people of Everett, Chelsea, and beyond.

**“I believe that the industries in Chelsea and other neighboring communities profit off of the use of our water resources... while residents pay the price of living with and around polluted waters. I believe that public and environmental safety should be the top priority, and that companies like Exxon should be held accountable for putting our communities at risk of toxic pollution.”**

**– Damali Vidot | Chelsea, Massachusetts**

# Win Quayle, Esq.

When Win Quayle retired after a successful career as a corporate partner and general counsel at Ropes & Gray LLP, he turned his time to volunteering – including as a Senior Fellow at CLF. Over the past five years, Win has not only helped CLF with a wide variety of projects, but also embraced a role as mentor to early-career attorneys at the organization.



## 1 What drew you to the law?

A few things: A kindly lawyer helped our family when my father passed away suddenly when I was in college. The lawyer went beyond the call of duty, advising my mother on business and financial matters and taking a personal interest in my two sisters and me.

That was also the Watergate era, and legal issues were in the news all the time – as they are now. There was the so-called Saturday Night Massacre, when President Nixon ordered Attorney General Elliot Richardson to fire the special prosecutor, Archibald Cox. Richardson refused and resigned. Both Cox and Richardson were models of principled lawyers. (I ended up working at Ropes & Gray, the firm where they both had practiced.)

After college, I spent time in divinity school. There, I took a law school course and had a field placement with a public interest law firm. I enjoyed helping parents and children exercise their rights under the Massachusetts special education law.

These experiences helped me see some of the ways lawyers help people in need and adhere to high ethical standards.

## 2 How did you first learn about Conservation Law Foundation?

When my family lived in Lincoln, Massachusetts, my neighbor was

John Pike, a retired Ropes & Gray partner volunteering with CLF. I had worked with John when I was a new associate at Ropes. He told me about his CLF work and often asked me to bring his CLF dictation tapes (yes, there was such a technology) to his former secretary for transcription. And Toni Hicks and Wendy Sheu, the former and current directors of CLF's Senior Fellows program, are both former Ropes lawyers. Before I retired, Toni told me about the program.

## 3 What interests you most about serving as a Senior Fellow?

Having the chance to learn about CLF's work and its inspiring staff from the inside, and especially working with some younger staff members. I hope I am contributing in some small way to CLF's efforts to protect the environment and deal with the climate crisis, which affects us all, including my two young grandchildren. It has also been great fun to get to know other Senior Fellows at CLF.

## 4 What advice would you give to those transitioning into retirement but who want to stay actively engaged?

Certainly talk to Wendy Sheu about the Senior Fellows program. You don't have to be a lawyer. Scientists, engineers, investment professionals, and others have participated in the program.

And for lawyers, consider the Access to Justice Fellows Program, a project of the Massachusetts Access to Justice Commission and the Lawyers Clearinghouse. It enables senior lawyers and retired judges to partner with nonprofit organizations, courts, and other public service entities to increase equal justice for all. In my first year as a CLF Senior Fellow, I also served as an Access to Justice Fellow. The range of work done by senior lawyers at various organizations through that program is inspiring.

## 5 How do you and your family get out and enjoy New England?

In winter, Nordic skiing is at the top of the list. We've skied in New Hampshire and Vermont recently. The Weston Ski Track in Weston, Massachusetts, has snow-making and is only 20 minutes from our Cambridge home. And in the summer, we love hiking on Vinalhaven in Maine and day sailing on Penobscot Bay. ♦

### Learn more about CLF Senior Fellows

Find out how you can contribute your experience and skill to protect New England's environment.

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

**And thank you to all of our Senior Fellows past and present.**



# cutting climate-damaging emissions

BY RISHYA NARAYANAN

PHOTO: VERMONT PHOTO ARRAY/SHUTTERSTOCK

## THE PROBLEM

Amidst the sweltering heat of July 2021, intense rainfall submerged much of Vermont. And while rain isn't new for New England, the intensity of last summer's storms brought catastrophic flooding to the state. Those July rains were on par with data showing that Vermont experiences more frequent and intense storms than it did 30 years ago. And, according to the state's Department of Health, annual precipitation has risen seven inches since 1965.

Unfortunately, such extreme weather is becoming more frequent because of climate change, as are other harmful impacts such as extreme heat and worsening air quality.

Vermont is hardly alone. Every part of New England is affected by climate change: its public health, economy, and even way of life. And, while we can't reverse all of the climate impacts we're already seeing in our region, we must still do everything we can to prevent them from getting even worse. That means breaking our addiction to fossil fuels for good.

## CLF IN ACTION

Transitioning into a clean energy future isn't going to be easy, but it is necessary. That's why CLF has fought for climate laws in every New England state that

will mandate and enforce drastic cuts in climate-damaging emissions. CLF led the way in passing Massachusetts' Global Warming Solutions Act in 2008. Connecticut passed its own version of the law that same year. More recently, we have played a key role in passing similar laws in Maine, Vermont, and Rhode Island.

But passing these laws is just the beginning. To make real progress slowing climate change, each state must implement strategies that can achieve the mandated cuts to polluting emissions. Because without action, New England's climate laws are just words on paper.

## PROGRESS

CLF is at the table, making sure that New England has plans that carry out each climate law. Most recently, we helped finalize Maine's Climate Action Plan, which maps out concrete strategies to achieve its required targets.

Vermont, meanwhile, has spent the past year developing its own Climate Action Plan. Its Climate Council released a preliminary version in December 2021. In the plan, the Council proposed ways to cut emissions from the buildings, electricity, transportation, industrial, and agricultural sectors.

CLF has been engaged in the plan's process to ensure it includes natural climate

solutions, proper tracking of climate-damaging emissions, a strong focus on transportation, amplified clean energy, and equity in climate solutions.

## NEXT STEPS

Over the coming months, the Vermont Climate Council will revise its plan, with a particular focus on transportation and using biomass to generate energy. The state Legislature has proposed laws this session to accomplish the plan's strategies. And the Scott administration is planning to propose several rules to further achieve the plan's strategies as well.

At the same time, Rhode Island is kicking off revisions to its 2016 Greenhouse Gas Emissions Reduction Plan to meet the targets in its newly updated climate law, which CLF, its partners, and its members helped pass last year.

The ultimate goal is for every New England state to adopt climate targets they are legally bound to meet. And, that these targets are bold enough – pushing us towards a net-zero future by 2050 for the sake of our communities and the world around us. ♦

### Help Shape Vermont's Climate Action

We need your help to make Vermont's Climate Action Plan strong. Find out how at [clf.org/vermontclimate](https://clf.org/vermontclimate).



# AROUND CLF

## MAINE

CLF and our partners joined the federal government to successfully reinstate a seasonal fishing closure off the coast of Maine aimed at protecting critically endangered North Atlantic right whales. Accidental entanglements in fishing gear are the leading cause of right whale injury and death. The restricted area ensures right whales can pass through the Gulf of Maine with less risk of entanglement. The rule will be in effect annually, from October through January, when the whales are most likely to be in the area.

## CONNECTICUT

Stormwater runoff from commercial and industrial properties is polluting several rivers in northwest Connecticut with bacteria and chemicals, putting people and wildlife at risk. CLF is petitioning state officials to hold all polluters accountable and to clean up the Naugatuck, Mad, and Still rivers in Litchfield County.

## NEW HAMPSHIRE

CLF and Community Action Works have settled a lawsuit against Casella Waste Systems and North Country Environmental Services after the companies' landfill leaked pollution into the Ammonoosuc River. The landfill owners must remove polluted sediment from a nearby channel and commit \$50,000 to local efforts to protect the river.

## RHODE ISLAND

CLF has filed a motion to force Shell Oil to turn over records regarding the company's knowledge of climate change and severe weather risks as part of its ongoing lawsuit. Shell's Providence facility sits at water's edge and is unprepared for climate risks such as flooding and extreme weather. Shell is refusing to release corporate documents that address its knowledge of or response to the impacts of climate change.

## VERMONT

Our advocates are working closely with legislators to implement Vermont's first-ever Climate Action Plan, a road map created through a public process over the last year to meet the state's Global Warming Solutions Act. Among other priorities, it details how the state will reduce emissions, become more resilient to a changing climate, achieve environmental justice, and improve transportation statewide.

## MASSACHUSETTS

CLF filed an appeal on behalf of East Boston residents to stop construction of an Eversource substation in the neighborhood. State officials shut the community out of the planning process for the project, wrongfully characterized the substation as a water-dependent use, and failed to consider the negative impact on environmental justice populations.

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### TAKE ACTION! Your Voice Matters

Take action on these issues and more 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: @clf •

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## Tami Nason

*Bethlehem, New Hampshire | Donor since 2016 | Member, Advocates Society | New Hampshire State Advisory Board Member. Pictured with her nephews Justin Hawk [LEFT], a former CLF intern, and Brandon Hawk [RIGHT].*

Tami Nason joined the New Hampshire State Advisory Board in 2021, but her CLF journey started long before then. Her father, Ben Nason, founded CLF in 1966 to prevent development of Mount Greylock in the Berkshires. Caring for the environment became an integral part of her childhood. Her parents instilled in her a lifelong appreciation for land conservation and wildlife protection.

Tami had been aware of CLF and was thrilled when her nephew spent a summer as a CLF intern. But it wasn't until she attended CLF's 50th anniversary gala with her family in 2016 that she gained a better understanding of how the organization has evolved over the years. Impressed by CLF's priorities and accomplishments, she was inspired to become more involved herself.

Throughout her life, Tami has been active with various environmental organizations, but CLF stands out because of its use of the law to achieve results in communities right here in New England. "CLF is one of the few organizations that employs the legal process to ensure tangible results and long-lasting impacts. Given my legal background, I highly value this approach and appreciate what can be achieved," she says.

Tami is proud to carry on her father's legacy and excited to be an ambassador for an organization both personally meaningful to her and closely aligned with her concerns about and hopes for the future. She will work tirelessly to help ensure a healthy, thriving New England for her nephews and niece, and generations to come.

**Our donors inspire us to never give up because so much is at stake. Hear more from CLF supporters at [www.clf.org/whywegive](http://www.clf.org/whywegive).**

# DOUBLE YOUR DONATION

Does your employer have a matching gift program?

Many companies support causes their employees care about. **That means they will match your donation to CLF.** Some even match gifts made by spouses and retirees – so your support for CLF can go twice as far.

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## OTHER WAYS TO GIVE

Want to give a one-time donation? Or give an honorary or gift membership? Or learn about planned giving?

You can do it all in a few clicks.

So come visit us online and make your donation today.

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

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Contact us today to learn more about giving to CLF.

Emma Cotter  
Development Assistant  
617.850.1760  
[ecotter@clf.org](mailto:ecotter@clf.org)

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# CONSERVATION MATTERS

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## LETTER FROM THE PRESIDENT



Like you, I have been watching the tragedy unfolding in Ukraine with a heavy heart – mourning the senseless loss of human life, while drawing inspira-

tion from the courage of the Ukrainian people in the face of this unlawful Russian invasion and ongoing atrocities.

Sadly, the fallout from this war has also been felt here at home. As oil and gas prices soared in recent weeks, those already struggling financially faced the greatest hardships – straining to afford the gasoline they need to drive to work and the heating oil they need to warm their homes. All while the oil industry's biggest players recorded their highest profits in seven years.

It's hardly news that Big Oil values profits over people. The families struggling to pay for gas today too often live in communities that are home to the industry's polluting chemical and oil storage facilities. And we've seen those same communities hit first and worst by climate impacts time and again in recent years.

Yet despite the clear and present dangers their facilities pose, including to communities here in New England, Big Oil has failed to invest in measures to safeguard them from sea level rise and increasingly powerful

and frequent storms – climate harms their polluting products have caused. Indeed, they haven't even taken the required steps to stop the risk of toxic pollution resulting from their everyday operations, let alone the potentially catastrophic flooding predicted from more extreme weather.

Watching Big Oil exploit the humanitarian crisis in Ukraine for profit has been infuriating. But it is just the latest outrage out of decades of duplicity and dishonesty – from the industry's long denial of climate change to the millions it spent undermining credibility in climate science.

The war on Ukraine underscores the urgent need to call out Big Oil for its disgraceful playbook. We can – we must – hold the industry accountable. For CLF, that means wielding the power of the law to force oil giants like ExxonMobil, Shell, and Gulf to answer for their climate deceit in court.

These ground-breaking lawsuits – and our refusal to give up no matter how long these cases take – send a forceful message: No company is too big or powerful to be held responsible for its actions.

Gratefully,

Bradley Campbell, President

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**CLF Maine** / 53 Exchange Street, Suite 200  
Portland, ME 04101 P: 207.210.6439

**CLF Massachusetts** / 62 Summer Street  
Boston, MA 02110 P: 617.350.0990

**CLF New Hampshire** / 27 North Main Street  
Concord, NH 03301 P: 603.225.3060

**CLF Rhode Island** / 235 Promenade Street,  
Suite 560, Mailbox 28, Providence, RI 02903  
P: 401.351.1102

**CLF Vermont** / 15 East State Street, Suite 4  
Montpelier, VT 05602 P: 802.223.5992