ANDREA JOY CAMPBELL
ATTORNEY GENERAL

THE COMMONWEALTH OF MASSACHUSETTS
OFFICE OF THE ATTORNEY GENERAL
CENTRAL MASSACHUSETTS DIVISION
10 MECHANIC STREET, SUITE 301
WORCESTER, MA 01608

(508) 792-7600
(508) 795-1991 fax
www.mass.gov/ago

November 12, 2024

Jessica Spanknebel, Town Clerk
Town of Hadley
100 Middle Street
Hadley, MA 01035

Re: Hadley Annual Town Meeting of May 2, 2024 -- Case # 11355
Warrant Article # 23 (Zoning)
Warrant Article # 6 (General) [1]

Dear Ms. Spanknebel:

Article 23 – Under Article 23 the Town amended its zoning by-laws to add new definitions related to energy storage systems ("ESS"); amended the existing definition of "solar energy system;" and amended Section XXVIII to add references to ESS, including a new Section 28.5.4, "Large Energy Storage Systems."

Except for the text in Section 28.5.4.3.9 prohibiting earth removal "to facilitate installation" of an ESS, which we disapprove because it is an unreasonable regulation of ESS in conflict with G.L. c. 40A, § 3, we approve the amendments adopted under Article 23 because they are consistent with the Section 3's solar protections as analyzed by the Supreme Judicial Court in Tracer Lane II Realty, LLC v. City of Waltham, 489 Mass. 775, 779, 781 (2022) (to evaluate the validity of a solar by-law under Section 3, a court will "balance the interest that the ordinance or bylaw advances and the impact on the protected use" while keeping in mind that Section 3's solar energy provision "was enacted to help promote solar energy generation throughout the Commonwealth."); see also Amherst v. Attorney General, 398 Mass. 793, 795-96 (1986) (requiring inconsistency with state law or the constitution for the Attorney General to disapprove a by-law).

By statute, ESS qualify as "solar energy systems" and "structures that facilitate the collection of solar energy" and are protected by G.L. c. 40, § 3. General Laws Chapter 164, Section 1, defines "energy storage system" as "a commercially available technology that is capable of absorbing energy, storing it for a period of time and thereafter dispatching the

[1] In a decision issued July 12, 2024, we approved Article 6 and by agreement with Town Counsel as authorized by G.L. c. 40, § 32, we extended the deadline for our decision on Article 23 for 45-days until September 25, 2024. On September 24, 2024, we extended the deadline for Article 23 for an additional 45-days.

energy."[2] See also Next Sun Energy LLC v. Fernandes, No. 19 MISC. 000230 (RBF), 2023 WL 3317259, at *14 (Mass. Land Ct. May 9, 2023), amended, No. 19 MISC. 000230 (RBF), 2023 WL 4156740 (Mass. Land Ct. June 23, 2023), judgment entered, No. 19 MISC. 000230 (RBF), 2023 WL 4145901 (Mass. Land Ct. June 23, 2023) (finding that battery energy storage system is entitled to Section 3 solar protections).

In this decision we summarize the by-law amendments; discuss the Attorney General's limited standard of review of town by-laws under G.L. c. 40, § 32; and then explain why, under that limited standard of review, we partially approve the by-law provisions adopted under Article 23.

I. Summary of Article 23

Under Article 23, the Town made a number of amendments related to ESS. One change amends Section 1, "Purpose and Definitions," to add new terms related to ESS as follows:

> Energy Storage System: A device utilized to store electrical energy (AC or DC) by converting electrical energy into chemical energy or vice-versa. May consist of a single battery or multiple batteries or other means which accomplish this conversion. May also include any devices utilized to provide cooling to said storage device.
>
> Small Capacity Energy Storage System: Any energy storage system less than 150 kWh.
>
> Large Capacity Energy Storage System: Any energy storage system of 150 kWh or larger.

Another change amends the existing definition of "Solar Energy System," to add in new text in underline as follows:

> Solar Energy System: All equipment, machinery and structures utilized in connection with the conversion of light to electricity. This includes, but is not limited to, transmission, collection and supply equipment, substations, transformers, service and access roads. Energy storage systems are not included in this definition, except where specifically mentioned in § 28.

In addition, under Article 23 the Town voted to amend Section XXVIII, "Solar Energy Systems," to add in references to ESS throughout the by-law, as well as add a new Section 28.5.4, "Large Capacity Energy Storage Systems," imposing requirements on this use.

[2] We note that the development of energy storage systems is critical to the promotion of solar and other clean energy uses. On August 9, 2018, An Act to Advance Clean Energy, Chapter 227 of the Acts of 2018 ("Act"), was signed into law by Governor Baker. Section 20 of the Act established a 1,000 MWh energy storage target to be achieved by December 31, 2025. The Act also required DOER to set targets for electric companies to procure energy dispatched from battery energy storage systems. https://www.mass.gov/info-details/esi-goals-storage-target (last visited November 4, 2024).

As amended, Section XXVIII applies to the construction and operation of solar energy systems (solar) and ESS. Sections 28.1, "Purpose" and 28.2, "Applicability." Section 28.4 imposes general requirements for all solar and ESS including a requirement that the owner of a solar or ESS is responsible for maintaining them in good condition, including making structural repairs, and requiring spill containment and security measures. See Section 28.4.3, "System Conditions." The by-law categorizes different types of solar and ESS and imposes different requirements by category. See Section 28.5, "Solar Energy System Permits." For example, building-integrated solar and ESS, if associated with "Small Capacity Energy Storage Systems" (as that term is defined in Section 1), require a building permit and may be located in any zoning district in the Town. Section 28.5.1. Small-scale Ground Mounted [Solar] Energy Systems[3] (defined in Section 1 as occupying a footprint of less than one acre) and small capacity ESS, require "Administrative Review" under Section 28.6 of the zoning by-laws as well as a building permit, and are allowed in any zoning district in the Town. Section 28.5.2.

Large-scale Ground-Mounted Solar Energy Systems (defined in Section 1 as occupying a footprint greater than 1 acre but no more than 10 acres) and Large-Capacity ESS that are designed as on-site solar energy systems require Administrative Review, a commercial site plan approval, and a building permit; and those that are designed for off-site solar energy systems require Administrative review, commercial site plan approval, a solar energy special permit (per Section 28.7), and a building permit. See Sections 28.5.3.1 and 28.5.3.2. The existing zoning by-law, Section 28.53.3, "Districts," provides that large-scale, ground-mounted solar energy systems are allowed in the Agricultural/Residential (AR) District and Industrial (I) District. And, as amended under Article 23, Large Capacity ESS are also allowed in the AR and the I District but are prohibited in the Aquifer Protection Overlay District (APD Overlay Zones). Section 28.5.3.3.

Section XXVIII, as amended, now includes Large Capacity ESS in the requirements related to screening (Section 28.5.3.4); consultants (Section 28.5.3.5); and abandonment and decommissioning (Section 28.5.3.6). In addition, under Article 23, the Town amended Section XXVIII to add a new Section 28.5.4, "Large Capacity Energy Storage Systems," that imposes additional requirements on Large Capacity ESS.

Specifically, Section 28.5.4.1 allows a Large Capacity ESS per Section 28.5.3.3 "whether or not it is associated with a solar energy generating system." In addition, the by-law requires a Large Capacity ESS to comply with National Fire Protection Association (NFPA) standards; requires the use of non-toxic cooling liquid, regulates noise produced by an ESS; imposes certain spill containment requirements, requires the ESS to be installed on a ground mount concrete pad without footings or foundation; requires electrical wiring to be below grade, and imposes fire prevention controls and setbacks. Sections 28.5.4.3.1 – 28.5.4.3.15. In addition, Section 28.5.4.3.9, regarding earth removal, and Section 28.5.4.3.12, regarding maximum energy capacity for ESS provide as follows (with emphasis added):

[3] We note that the Section 28.5.2 uses the term "Small-Scale, Ground-Mounted Energy System" but the definition in Section 1 refers to it as "Small-Scale, Ground-Mounted Solar Energy System." The Town may wish to consult with Town Counsel to determine if an amendment is needed at a future Town Meeting to make the terms consistent.

28.5.4.3.9 Removal of earth to facilitate installation of Energy Storage System is prohibited.

28.5.4.3.12 Maximum Energy Storage capacity shall not exceed five megawatt DC (5,000,000 wats direct current) of electrical energy.

Further under Article 23, the Town made a number of amendments to Section 28.6, "Solar Energy System Administrative Requirements," including a requirement that the Administrative Review application include a plan for maintenance of the solar energy system, "including maintenance of spill containment system per § 28.5.4.3.7" and that the use meet the "specifications of cooling and fire protection per § 28.5.4.3.2, § 28.5.4.3.11 and § 28.5.4.3.13." Sections 28.6.4.7 and 28.6.4.8. Also under Article 23, the Town made a number of amendments to Section 28.7, "Solar Energy System Special Permit requirements," to include Large Capacity ESS in the requirements related to lighting, signs, utility connections, emergency services, an operations & maintenance plan, sight lines, and a landscape plan. See Sections 28.7.1 – 28.7.9. Lastly, under Article 23 the Town amended Section 28.8, "Commercial Site plan Approval," to include Large Capacity ESS in the commercial site plan approval requirements.

II. Attorney General's Standard of Review of Zoning By-laws

Our review of Article 23 is governed by G.L. c. 40, § 32. Under G.L. c. 40, § 32, the Attorney General has a "limited power of disapproval," and "[i]t is fundamental that every presumption is to be made in favor of the validity of municipal by-laws." Amherst v. Attorney General, 398 Mass. 793, 795-96 (1986) (requiring inconsistency with state law or the constitution for the Attorney General to disapprove a by-law). The Attorney General does not review the policy arguments for or against the enactment. Id. at 798-99 ("Neither we nor the Attorney General may comment on the wisdom of the town's by-law.") Rather, to disapprove a by-law (or any portion thereof), the Attorney General must cite an inconsistency between the by-law and the state Constitution or laws. Id. at 796. "As a general proposition the cases dealing with the repugnancy or inconsistency of local regulations with State statutes have given considerable latitude to municipalities, requiring a sharp conflict between the local and State provisions before the local regulation has been held invalid." Bloom v. Worcester, 363 Mass. 136, 154 (1973).

Article 23, as an amendment to the Town's zoning by-laws, must be accorded deference. W.R. Grace & Co. v. Cambridge City Council, 56 Mass. App. Ct. 559, 566 (2002). When reviewing zoning by-laws for consistency with the Constitution or laws of the Commonwealth, the Attorney General's standard of review is equivalent to that of a court. "[T]he proper focus of review of a zoning enactment is whether it violates State law or constitutional provisions, is arbitrary or unreasonable, or is substantially unrelated to the public health, safety or general welfare." Durand v. IDC Bellingham, LLC, 440 Mass. 45, 57 (2003). A municipality has no power to adopt a zoning by-law that is "inconsistent with the constitution or laws enacted by the [Legislature]." Home Rule Amendment, Mass. Const. amend. art. 2, § 6.

III. Zoning Protections Granted to Solar Installations and Structures that Facilitate the Collection of Solar Energy by G.L. c. 40A, § 3

Solar energy facilities and related structures have been protected under Section 3 for almost 40 years, since 1985 when the Legislature passed a statute codifying "the policy of the commonwealth to encourage the use of solar energy." St. 1985, c. 637, §§ 7, 8. Id. § 2. Section 3's solar provision grants zoning protections to solar energy systems and the building of structures that facilitate the collection of solar energy as follows:

> No zoning . . . bylaw shall prohibit or unreasonably regulate the installation of solar energy systems or the building of structures that facilitate the collection of solar energy, except where necessary to protect the public health, safety or welfare.

In adopting Section 3, the Legislature determined that certain land uses are so important to the public good that the Legislature has found it necessary "to take away" some measure of municipalities' "power to limit the use of land" within their borders. Attorney General v. Dover, 327 Mass. 601, 604 (1950) (discussing predecessor to G.L. c. 40A, § 3); see Cnty. Comm'rs of Bristol v. Conservation Comm'n of Dartmouth, 380 Mass. 706, 713 (1980) (noting that Zoning Act as a whole, and G.L. c. 40A, § 3, specifically, aim to ensure that zoning "facilitate[s] the provision of public requirements"). To that end, the provisions of Section 3 "strike a balance between preventing local discrimination against" a set of enumerated land uses while "honoring legitimate municipal concerns that typically find expression in local zoning laws." Trustees of Tufts Coll. v. City of Medford, 415 Mass. 753, 757 (1993). Over the years, the Legislature has added to the list of protected uses, employing different language—and in some cases different methods—to limit municipal discretion to restrict those uses.

In codifying solar energy and related structures as a protected use under Section 3, the Legislature determined that "neighborhood hostility" or contrary local "preferences" should not dictate whether solar energy systems and related structures are constructed in sufficient quantity to meet the public need. See Newbury Junior Coll. v. Brookline, 19 Mass. App. Ct. 197, 205, 207-08 (1985) (discussing educational-use provision of Section 3); see also Petrucci v. Bd. of Appeals, 45 Mass. App. Ct. 818, 822 (1998) (explaining, in context of childcare provision, that Legislature's "manifest intent" when establishing Section 3 protected use is "to broaden … opportunities for establishing" that use). Indeed, the fundamental purpose of Section 3 is to "facilitate the provision of public requirements" that may be locally disfavored. Cty. Comm'rs of Bristol, 380 Mass. at 713.

The Supreme Judicial Court reaffirmed this principle in Tracer Lane II. In ruling that Section 3's protections required Waltham to allow an access road to be built in a residential district for linkage to a solar project in Lexington, the Court explicitly noted that "large-scale systems, not ancillary to any residential or commercial use, are key to promoting solar energy in the Commonwealth." Id. at 782 (citing Executive Office of Energy and Environmental Affairs, Massachusetts 2050 Decarbonization Roadmap, at 4, 59 n.43 (Dec. 2020) ("the amount of solar power needed by 2050 exceeds the full technical potential in the Commonwealth for rooftop solar, indicating that substantial deployment of ground-mounted solar is needed under any circumstance in order to achieve [n]et [z]ero [greenhouse gas emissions by 2050]")). The Court

explained that whether a by-law facially violates Section 3's prohibition against unreasonable regulation of solar systems and related structures will turn in part on whether the by-law promotes rather than restricts this legislative goal. Id. at 781. While municipalities do have some "flexibility" to reasonably limit where certain forms of solar energy may be sited, the validity of any restriction ultimately entails "balanc[ing] the interest that the . . . bylaw advances" against "the impact on the protected [solar] use." Id. at 781-82.

By statute, ESS qualify as "solar energy systems" and "structures that facilitate the collection of solar energy" and are protected by G.L. c. 40A, § 3. General Laws Chapter 164, Section 1, defines "energy storage system" as "a commercially available technology that is capable of absorbing energy, storing it for a period of time and thereafter dispatching the energy." See also NextSun Energy LLC v. Fernandes, No. 19 MISC 000230 (RBF), 2023 WL 3317259, at *14 (Mass. Land Ct. May 9, 2023), amended, No. 19 MISC 000230 (RBF), 2023 WL 4156740 (Mass. Land Ct. June 23, 2023), judgment entered, No. 19 MISC 000230 (RBF), 2023 WL 4145901 (Mass. Land Ct. June 23, 2023) (finding that battery energy storage system is entitled to Section 3 solar protections).

IV. Section 28.5.4.3.9's Prohibition on Earth Removal During the Installation of an ESS Conflicts with G.L. c. 40A, § 3

Section 28.5.4 imposes additional requirements on Large Capacity ESS, including Subsection 28.5.4.3.9 that provides as follows, with emphasis added:

> **Removal of earth to facilitate the installation of Energy Storage Systems is prohibited.**

Section 28.5.4.3.9 prohibits the removal of any earth that may be needed to facilitate installation of an ESS. Given the by-law's other requirements, including requirements for a spill containment system (Section 28.5.4.3.6); that ESS be installed on a ground mount concrete pad (Section 28.5.4.3.8); and that all electrical wiring be below grade (Section 28.5.4.3.10), it is difficult to conceptualize how any Large Capacity ESS would not require at least some degree of earth removal. However, Section 28.5.4.3.9 categorically prohibits all earth removal, in any quantity, without any articulated evidence of public health, safety or welfare concerns sufficient to justify this prohibition. Because this requirement would appear to result in a prohibition of all large capacity ESS if even a shovelful of earth removal is required, this requirement on its face amounts to an unreasonable regulation of ESS in violation of G.L. c. 40A, § 3. For this reason, we disapprove Section 28.5.4.3.9, shown above in bold and underline. The Town should consult with Town Counsel with any questions on this issue.

V. The Remaining Approved Provisions Must be Applied Consistent with G.L. c. 40A, § 3

On our standard of review, we do not find that the remaining by-law provisions adopted under Article 23 violate G.L. c. 40A, § 3 and we therefore approve them. However, we offer the following comments to the Town to ensure that the by-law provisions are applied consistent with the protections given to solar uses and related structures such as ESS in G.L. c. 40A, § 3.

The by-law imposes several siting regulations and limitations on Large Capacity ESS, including limiting the maximum storage capacity to no more than 5 megawatt DC (Section 28.5.3.12) and requiring a 300 foot setback from any residential use (Section 28.5.4.3.14). In addition, Section 28.5.4 imposes fire protection requirements on a Large Capacity ESS, including that a spill containment system must be fire resistant and heat resistant to 2300 degrees Fahrenheit. Section 28.5.4.3.6. If the by-law's provisions, including those noted above, are used to deny an ESS, or otherwise applied in ways that make it impracticable or uneconomical to build solar energy systems and related structures (including ESS), such application would run a serious risk of violating G.L. c. 40A, § 3. See Tracer Lane II, 489 Mass. at 781 (Waltham's prohibition on solar energy systems in all but one to two percent of its land area violates the solar energy provisions of G.L. c. 40A, § 3.).

We also note that the new definition of solar energy system and the text in Section 28.5.4.1 could create potential confusion, given that the Town has amended Section XXVIII, "Solar Energy Systems," to now reference throughout both solar and ESS but Section 28.5.4.1 includes ESS regardless of whether it is connected to solar ("Large Capacity Energy Storage Systems shall be permitted per § 28.5.3.3 whether or not it is associated with a solar energy generating system."). But the amended definition of solar energy system states in relevant part that "[e]nergy storage systems are not included in this definition, except where specifically mentioned in § 28." Therefore, on the one hand, Section 28.5.4.1 states that standalone ESS are allowed, but the new definition of solar energy system could potentially suggest otherwise. The Town cannot apply the amendments adopted under Article 23 to prohibit Large Capacity ESS as a principal use. The Town must apply the by-law consistent with this application. The Town should consult with Town Counsel regarding whether the by-law should be amended at a future Town Meeting to address this issue.

Moreover, "Large-Scale Ground-Mounted, Solar Energy Systems," and Large Capacity ESS are permitted in the AR and I Districts, except that Large Capacity ESS are not permitted in the APD Overlay Zones. Section 28.5.3.3. Because neither Section 28.5.3.2 (regarding required permits) or Section 28.5.3.3 (allowed districts) distinguish between Large Capacity ESS associated with a solar system or not associated with a solar system, it is unclear whether Section 28.5.3.3, as amended, prohibits only a principal use Large Capacity ESS from the APD Overlay Zones, or whether a large-scale solar system with a Large Capacity ESS is also prohibited. The Town may wish to discuss with Town Counsel whether Sections 28.5.3.2 and 28.5.3.3 should be clarified at a future Town Meeting to address this issue.

In addition, Section 28.5.4 imposes several fire protection requirements on Large Capacity ESS, including compliance with NFPA 855 (Section 28.5.4.3.1); spill containment requirements (Section 28.5.4.3.6); and a requirement for a sprinkler system as "may be required under Massachusetts General Laws Chapter 148…" (Section 28.5.4.3.15). The Town must ensure that these fire protection related requirements are applied consistent with G.L. c. 148 and 527 CMR 1.00 *et seq.*, the state Fire Code. The Town should consult with Town Counsel with any questions.

Lastly, given that Large Capacity ESS are allowed in the AR and I Districts, but are excluded from the APD Overlay Zones, it is not clear whether the Town has left sufficient land to accommodate a Large Capacity ESS. Hadley is comprised of six zoning districts: AR,

Residential (R), Limited Business (LiB), Local Business (LoB), Business (B) and I; and it appears that the majority of the Town is zoned as AR.[4, 5]

During the course of our review, we received an opposition from legal counsel for an ESS developer urging our disapproval of Article 23 alleging, among other reasons, that Article 23 "would preclude meaningful development of ESS projects in Hadley without justification." See June 6, 2024 letter from Attorney Hauer to AAG Hurley.[6] In particular, the opposition alleges that the exclusion of Large Capacity ESS from the APD Overlay Zones "is effectively preclusive," stating that although the AR and I Districts collectively comprise over 90% of the land in Town (representing approximately 13,365 acres out of 14,850 acres) only approximately 350 acres are "realistically developable for ESS…because the vast majority of the land is construction-restircted due to land protections, Endangered Species Program, restricted Open Space, wetlands, and waterways." Id. Further, the opposition alleges that approximately 35.7% of all land in Hadley comprises the APD Overlay Zones. Id. As a result, the opposition asserts that siting a Large Capacity ESS in only the AR or I Districts would "restrict[ ] the siting of ESS to a small portion of Hadley." Id.

Conversely, during our review, we also received correspondence from the Town's Counsel urging our approval of Article 23, on grounds that the Town may treat uses in different districts differently. See July 21, 2024 letter from Attorney Mead to AAG Hurley, pg. 2. Moreover, the Town contends that "[a] municipality's interest in the preservation of each zone's unique characteristics is a legitimate interest, and the balance that must be struck turns on whether the regulation prohibit or unreasonably restrict the use." Id. (citing Tracer Lane, 489 Mass. at 781). The Town also alleges that Article 23 permits small capacity ESS in all zones in Hadley and allows for Large Capacity ESS, whether associated with solar or not, in the same zones that large-scale solar uses are allowed, excepting only the APD Overlay Zones. See July 21, 2024 letter, pgs. 2-3. The Town further contends that the potential effects on the aquifer are a legitimate public health concern. Id. (citing NextSun Energy, LLC v. Fernandes, No. 19 MISC 00230 (RBF), 20023 WL 3317259 *15 (Mass. Land Ct., May 9, 2023)).

Based on the information provided in the opposition itself, it appears that the by-law allows Large Capacity ESS in 90% of the Town, except for land that also overlays the APD Overlay Zones, which encompasses approximately 35.7% of the entire Town. Thus, it appears that Large Capacity ESS is allowed in more than 50% of the Town. Based on our standard of review, we cannot conclude that the siting regulations and limitations, including prohibiting Large Capacity ESS in the APD Overlay Zones, conflict with Section 3. However, if the by-law's provisions are used to deny ESS, or are otherwise applied in ways that make it impracticable or uneconomical to build solar energy systems and related structures (including ESS), such application would run a serious risk of violating G.L. c. 40A, § 3. See Tracer Lane II, 489 Mass. at 781 (Waltham's prohibition on solar energy systems in all but one to two percent of

[4] See the Town's zoning by-laws, Section 2.1, "Types of Districts."

[5] See https://www.hadleyma.org/sites/g/files/vyhlif651/f/uploads/zoning_map.pdf

[6] We appreciate this correspondence, as well as the Town's two responses to the developer's counsel's letters, as they have aided our review.

its land area violates the solar energy provisions of G.L. c. 40A, § 3.); see also PLH LLC v. Town of Ware, No. 18 MISC 000648 (GHP), 2019 WL 7201712, at *3 (Mass. Land Ct. Dec. 24, 2019), aff'd, 102 Mass. App. Ct. 1103 (2022) ("the review of the municipality conducted under the bylaw's special permit provisions must be limited and narrowly applied in a way that is not unreasonable, is not designed or employed to prohibit the use or the operation of the protected use, and exists where necessary to protect the health, safety or welfare."). The Town should consult further with Town Counsel on this issue to ensure the by-law is applied consistent with G.L. c. 40A, § 3.

V. Conclusion

Except for the text in Section 28.5.4.3.9 that prohibits earth removal to facilitate the installation of an ESS, that we disapprove as explained above, we approve the remaining portions of Article 23 because, on the record before us, we cannot conclude that these provisions amount to an unreasonable regulation of ESS in conflict with Section 3. However, if the remaining provisions in Article 23 are used to deny a solar installation or an ESS, or otherwise applied in ways that make it impracticable or uneconomical to build solar or ESS, such application would run a serious risk of violating G.L. c. 40A, § 3. See Tracer Lane II, 489 Mass. at 775. The Town should consult with Town Counsel with any questions.

Note: Pursuant to G.L. c. 40, § 32, neither general nor zoning by-laws take effect unless the Town has first satisfied the posting/publishing requirements of that statute.

Very truly yours,

ANDREA JOY CAMPBELL
ATTORNEY GENERAL
Nicole B. Caprioli
By: Nicole B. Caprioli
Assistant Attorney General
Municipal Law Unit
10 Mechanic Street, Suite 301
Worcester, MA 01608
(774) 214-4418

cc: Town Counsel Lisa L. Mead