Richmond Planning Board Meeting
Town Hall
Minutes
July 11, 2022

Members present: Richard Bell, Douglas Bruce, John Hanson (Chairman), Katherine Keenum, Peter Lopez

The meeting began at 6:30 P.M.

1. Mr. Hanson reported that an application for an ANR submitted on behalf of Thomas and Ann Rolfs had been postponed, probably until August.

2. On behalf of MassAudubon, an objection to the Open Space and Recreation bylaw amendment passed by the voters at Richmond's Annual Town Meeting on May 18, 2022, has been submitted to the Attorney General's Office by Jonathan D. Witten KP/Law (see Exhibit 1). Mr. Hanson proposed reviewing the facts so that all members would be fully informed in case we were asked questions by residents. Discussion established the following:

- MassAudubon's objection (p. 3) makes reference to a requirement for a special permit that appeared only in the Perry's Peak neighbors' version of the proposed amendment. That version was rejected at Town Meeting. The mistake makes the objection defective.
- The Town Clerk has confirmed that the correct version of the bylaw amendment was sent by her office to the Attorney General.
- MassAudubon also objected to the amendment's stipulation that no fee should be charged for recreation as a by-right use of land. A review of minutes shows that the stipulation of "no fee" first appeared in a draft that was discussed at the Planning Board's meeting of September 13, 2021. It was contained in every draft thereafter. MassAudubon had ample time to work with the Board over any concerns.
- On September 22, 2021, Mr. Hanson had a conversation with Donna McNicholl, the lawyer acting as Town Counsel on matters relating to the lawsuit brought by the Berkshire Natural Resources Council against the Richmond Board of Appeals. She reviewed the proposal, suggested adding a minimum acreage requirement, but said nothing against the "no fee" stipulation.
- Sign-up sheets show that on February 14, 2022, Katherine Buttolph, a MassAudubon Land Protection Specialist, attended the hearing on the Planning Board's version of the amendment. She made no comment at the hearing and left before the meeting that followed immediately. No representative of MassAudubon attended any other hearing or meeting during the eight months the proposal was under consideration.
- On Friday, July 1, 2022, Mr. Hanson pointed out to Stephen Hutchinson, Senior Regional Director of MassAudubon, that Section 4.8.A.4 of the *Richmond Zoning Bylaw* permits the unrestricted use of land by non-profit educational corporations so that, taken as a whole, the *Bylaw* should not be objectionable to the society.
- The Planning Board's responsibility for the amendment ended when the proposal was sent to the Selectmen for inclusion on the warrant for the Annual Town Meeting. Therefore the matter now rests with the Board of Selectmen and Town Administrator.

3. Mr. Bell moved that the minutes of June 13, 2022, be approved. Mr. Lopez seconded. The motion carried unanimously with a vote of 4–0 (Mr. Bruce abstained on the grounds that he had not attended the meeting.)

The meeting adjourned at 6:55 p.m.

Respectfully submitted,
Katherine Keenum, Clerk

Exhibit 1: MassAudubon objection

September 14, 2022

Jonathan D. Witten
jdwitten@k-plaw.com

BY ELECTRONIC MAIL ONLY – (margaret.hurley@state.ma.us)

Margaret J. Hurley, Esq.
Assistant Attorney General
Chief, Central Massachusetts Division
Director, Municipal Law Unit
Ten Mechanic Street, Suite 301
Worcester, MA 01608

Re: Objection to the Town of Richmond's Zoning Bylaw Amendment – Article 7

Dear Assistant Attorney General Hurley:

Please be advised that this office represents the Massachusetts Audubon Society, Inc. ("Mass Audubon"). Mass Audubon respectfully submits this letter in opposition to the Town of Richmond's vote to amend its Zoning Bylaws pursuant to Article 7 of its 2022 Annual Town Meeting Warrant.

For the reasons set forth below, the amendment to the Zoning Bylaw as proposed and voted through Article 26, facially conflicts with state law and must be disapproved by your office pursuant to G.L c. 40, § 32.

BACKGROUND

On or about May 18, 2022, by a two-thirds vote of its Annual Town Meeting, the voters of the Town of Richmond approved an amendment to the Zoning Bylaws through Article 7 of its Annual Town Meeting warrant.[1] Specifically, the amendment added a new Section 14 governing the recreational, educational, and research use of open space and conservation land, and revising Sections 4.8 (A) and (B) concerning such land.[2] The new Section 14 reads, in pertinent part, as follows:

> Section 14: Recreational, Educational and Research Use of Open Space and Conservation Land
>
> Purpose: Provide for the recreational, educational and research use of open space and conservation land Definitions:
>
> Conservation Land
> Land permanently restricted to limit residential or commercial development of the land or to limit the number of residential or commercial building lots permitted in any sub-division of the land.
>
> Open Space Residential Land

[1] A copy of the warrant is available online, at https://cms6.revize.com/revize/richmondma/ATM%20Warrant.pdf.

[2] The voters had a similar proposed amendment before them under Article 8 of the Annual Town Meeting warrant, as submitted by a citizen's petition, but Article 8 did not pass by the requisite two-thirds majority. See May 18, 2022 Annual Town Meeting minutes, available online at https://cms6.revize.com/revize/richmondma/ATM%2005-18-22%20certified%20minutes.pdf.

Land exceeding the minimum lot size for a single-family dwelling or two-family dwelling, or land not used for a dwelling, or structures accessory to a dwelling, that is preserved or maintained in an open condition, including gardens, fields, pastures, forests, wood lots, orchards, lawns, and other similar uses.

Open Space Agricultural Land
Land used for agricultural, horticulture, or floriculture as a principal or accessory use that is preserved or maintained in an open condition, including, fields, pastures, forests, wood lots, orchards, gardens, and other similar uses.

Open Space and Conservation Recreation
The use of Open Space Residential Land, Open Space Agricultural Land, or Conservation Land, open to the public, for hiking, snow shoeing, backpacking, hunting, fishing, bird watching, photography or other similar recreational activities.

Open Space and Conservation Education and Research
The use of Open Space Residential Land, Open Space Agricultural Land, or Conservation Land, open to the public, that may include guided tours, for the observation and study of wildlife, plants, flora, geology, and other natural features.

Parking Lot
The use of land for the construction of a parking lot.

1.0 Parking Lot Requirements for this section
The use of land for a parking lot shall meet the following requirements:

a) The applicant shall submit an application for site plan approval under Section 6.6 of this By-Law
b) The application shall include an impact study of expected vehicle traffic, intensity of use, visitors per day and other data relevant to the proper regulation of Parking Lot size and use at the proposed site."

The vote under Article 7 further amended the table of permitted principal uses in Section 4.8(a) and (b) of the Zoning Bylaw by adding, in pertinent part, a special permit requirement for all zoning districts for "[t]he use of land, under Section 14, for Open Space and Conservation Education and Research, provided that no fee is charged, and no off-highway motorized vehicles are permitted" and any land that is "publically promoted open space and conservation education and research" which is defined as "Publicly Promoted Open Space and Conservation Education, and Research."[3] Further, educational and research facilities are only permitted under the Permitted and Accessory Principle Uses if "no fee is charged." See Section 4.8(A), Subsections 18(a) through (d); Section 4.8(B), Subsections 18(a) through (c).

These restrictions on educational research centers are inconsistent with the protections afforded nonprofit educational institutions, G.L. c. 40A, § 3, and therefore must be disapproved and stricken from the text of the Zoning Bylaw, as set forth below.

DISCUSSION

I. *The Attorney General Must Disapprove of the Bylaw's Text Where it is Facially Inconsistent With State Law.*

[3] A copy of the Planning Board Report outlining the amendments to the Zoning Bylaw is available online, at https://cms6.revize.com/revize/richmondma/Planning%20Board%20report%203-14-22%20Residents.pdf.

Pursuant to 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." See Amherst v. Attorney General, 398 Mass. 793, 795, 798-799 (1986). The Attorney General does not review the policy arguments for or against the enactment. Id. at 798-99. Rather, the Attorney General reviews a bylaw's text and has authority to approve or disapprove its text if it is inconsistent with state law. Id. The Attorney General's review of a zoning enactment involves a determination whether the bylaw 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).

In order to disapprove of a bylaw (or any portion thereof), there must be an inconsistency between the bylaw and the laws of the Commonwealth. Id. at 796. See also Bloom v. Worcester, 363 Mass. 136, 154 (1973) (requiring a "sharp conflict between the local and State provisions" to invalidate bylaw). In this case, as set forth below, the Town's zoning amendment is plainly inconsistent with the text and intent of G.L. c. 40A, § 3 (the so-called "Dover Amendment"), and accordingly, the Town's zoning bylaw must be disapproved by the Attorney General.

II. *The Town's Zoning Bylaw Amendment Facially Conflicts with the Dover Amendment, G.L. c. 40A, § 3.*

A. The Massachusetts Zoning Act and the "Dover Amendment."

A general overview of the applicable law may be of some use before turning to the specific facts at issue here. Massachusetts General Laws Chapter 40A is the "Massachusetts Zoning Act." Adopted by the Massachusetts Legislature in 1975 by virtue of Chapter 808 of the Acts of 1975, the purpose of the Zoning Act is to "facilitate, encourage, and foster the adopting and modernization of zoning ordinances and by-laws by municipal governments …." See St. 1975, c. 808, § 2A.

Section 3 of the Zoning Act (hereinafter referred to as the "Dover Amendment") contains the following limitations on the ability of a municipality to regulate religious and educational uses:

> **No zoning ordinance or by-law shall regulate or restrict . . . the use of land or structures** for religious purposes or **for educational purposes** on land owned or leased by the commonwealth or any of its agencies, subdivisions or bodies politic or by a religious sect or denomination, **or by a nonprofit educational corporation**; provided, however, that such land or structures may be subject to reasonable regulations concerning the bulk and height of structures and determining yard sizes, lot area, setbacks, open space, parking and building coverage requirements. (Emphasis added).

This language is referred to as the "Dover Amendment" because of a Supreme Judicial Court decision in 1951 invalidating a Town of Dover zoning by-law that prohibited sectarian educational uses in residential zoning district. The Court in Attorney General v. Inhabitants of the Town of Dover, 327 Mass. 601 (1951), interpreted the town's zoning by-law in light of Chapter 325 of the Acts of 1950, which was originally codified at G.L. c. 40, § 25, stating that "[n]o by-law or ordinance which prohibits or limits the use of land for any church or other religious purpose or which prohibits or limits the use of land for any religious, sectarian or denominational educational purpose shall be valid." Finding that the "statute and … by-law as amended cannot stand together … [because a] conflict is apparent," the Court struck down the by-law as unlawful. Id. at 604.

Massachusetts courts have since had considerable occasion to examine the legislative history of the Dover Amendment, and specifically in the context of educational programs. In so doing, courts have noted that, although the Department of Community Affairs had proposed "that Dover Amendment protection be limited to 'school[s]' or analogous 'place[s] or facilit[ies],' " see 1972 House Doc. No. 5009, at 84, the Legislature rejected this language. See

McLean Hospital Corporation v. Town of Lincoln, 483 Mass. 215, 226 n.5 (2019). The courts thus opted not to adopt "a statutory test that would limit Dover Amendment protection only to projects similar to 'schools.'" Id. The Dover Amendment also exists, in part, to protect educational institutions from a municipality's exercise of preferences as to what kind of educational facilities it will welcome, "the very kind of restrictive attitude which the Dover Amendment was intended to foreclose." Id.

B. What Constitutes a Nonprofit Educational Corporation?

As a threshold matter, unlike when analyzing the use of the land for educational purposes, nothing in G.L. c. 40A, § 3 requires that education be the dominant purpose or primary activity of a nonprofit corporation in order that it may qualify as a "nonprofit educational corporation." See Gardner–Athol Area Mental Health Ass'n, Inc. v. Zoning Bd. of Appeals of Gardner, 401 Mass. 12, 15-16 (1987). The proper test is whether its articles of organization permit it to engage in educational activities. Id.

For example, in Gardener-Athol, a nonprofit mental health corporation brought action to challenge the decision of a local zoning board of appeals that prohibited the corporation's use of a premise as a residential care facility for adults with mental disabilities. Id., at 13. The Court determined that "[t]he word educational in the phrase 'nonprofit educational corporation' is not made superfluous by our construction of the statute. Not every word in a statute need carry a heavy load. It is enough to say that 'educational' in the phrase 'nonprofit educational corporation' means that the proposed educational activities must be within the corporate purposes of the nonprofit corporation." Id., at 15. See also Worcester County Christian Communications, Inc. v. Board of Appeals of Spencer, 22 Mass. App. Ct. 83, 87 (1986) ("all that is required is that the plaintiff be a nonprofit corporation intending to use its land or structures for religious or educational purposes").

Mass Audubon meets this criterion. Incorporated as a non-profit domestic corporation, the purpose of the Massachusetts Audubon Society, Inc., is as follows:

> To capture the attention of the inquisitive mind, instill an affection for all life, and foster an intelligent understanding of human beings' position in the natural world; to promote harmony between human activities and the natural systems which support humans and all other living species; **to support programs which conserve natural resources, educate children, government officials and the public, and advance scientific understanding of environmental issues through research**; to preserve a legacy of wildness and natural diversity in order to honor the past by serving the future, and for such other **exclusively charitable and educational purposes** as are permitted by Section 501 (c) (3) of the Internal Revenue Code of 1986 and M.G.L. c. 180, Section 4, as they may be amended from time to time [emphasis added].[4]

Because the Dover Amendment does not require that education be the dominant purpose or primary activity of a nonprofit corporation, and Mass Audubon's articles of incorporation permit it to engage in educational activities, Mass Audubon may avail itself of the protections of G.L. c. 40A, § 3 to the extent that a proposed use has an "educational purpose." Accord Gardner-Athol, 401 Mass. at 15.

C. The "Regis Test" – What Constitutes an Educational Purpose?

As Massachusetts Courts have consistently held that the Dover Amendment is not limited to schools or analogous places, there is an abundance of case law interpreting whether uses proposed by nonprofit corporations are entitled to zoning protection. The following is a non-exhaustive list of cases that have interpreted the extent of the educational zoning protections afforded by the Zoning Act:

[4] See Restated Articles of Organization, Massachusetts Corporations Division Filing No. 020500210894, Massachusetts Audubon Society, Inc. (Identification Number: 042104702).

- Fitchburg Housing Authority v. Board of Zoning Appeals of Fitchburg, 380 Mass. 869 (1980) (community residence for former mental patients to be trained for independent living);
- LaSalle College v. City of Newton, 1 LCR 80 (Mass. Land Ct. 1993) (elderly housing developed on educational institution's campus with programmatic links to the college), aff'd, 36 Mass. App. Ct. 1122 (1994);
- Radcliffe College v. City of Cambridge, 350 Mass. 613 (1966) (rescript) (parking, feeding, and housing of college personnel);
- Worcester County Christian Communications, Inc. v. Board of Appeals of Spencer, 22 Mass. App. Ct. 83, 87 (1986) (radio station may be educational use);
- Commissioner of Code Inspection of Worcester v. Worcester Dynamy, Inc., 11 Mass. App. Ct. 97 (1980) (dormitory use);
- Bible Speaks v. Board of Appeals of Lenox, 8 Mass. App. Ct. 19, 30 (1979) (lights and snack bar at sports field on school campus);
- Harbor Schools, Inc. v. Board of Appeals of Haverhill, 5 Mass. App. Ct. 600 (1977) (residential facility for the education of emotionally disturbed children);
- Gardner-Athol Area Mental Health Ass'n, Inc. v. Zoning Board of Appeals of Gardner, 401 Mass. 12 (1987) (residential care facility for adults with mental disabilities);
- Whitinsville Ret. Soc'y, Inc. v. Town of Northbridge, 394 Mass. 757 (1985) (nursing home facility not used for an educational purpose);
- Kurz v. Bd. of Appeals of N. Reading, 341 Mass. 110 (1960) (dance class not an educational use);
- Trustees of Tufts College v. Medford, 515 Mass. 753 (1993) (parking garage on college campus).

In the landmark case of Regis College v. Town of Weston, 426 Mass. 280 (2012), the Supreme Judicial Court articulated a two-prong test to determine whether a proposed use falls within the protection of the Dover Amendment. First, the use must have as its "bona fide goal something that can reasonably be described as 'educationally significant.'" Id. at 285, quoting Whitinsville Retirement Soc'y, Inc. v. Northbridge, 394 Mass. 757, 761 n.3 (1985). Second, the educationally significant goal must be the "'primary or dominant' purpose for which the land or structures will be used." Regis College, supra. The primary or dominant purpose requirement "helps ensure that a party invoking Dover Amendment protection does so without engrafting an educational component onto a project in order to obtain favorable treatment under the statue. Id.

In Regis College, the Supreme Judicial Court vacated the Land Court's summary judgment decision in which the judge had found that a proposed multi-building residential community for the elderly to be built across the street from the college's main campus was not entitled to Dover Amendment protection, even though it included an educational component (i.e., residents would be required to take courses each semester). The Court noted that while "[e]ducation" is to be given a broad meaning, and the proposed use may have an educational purpose, the educational use must be a "primary or dominant one," and "predominate over residential and recreational components" for the Dover Amendment to apply. Id., at 288.

D. What Local Regulations are Impacted?

The case law regarding Dover protections uniformly maintain that, under the exemptive provisions of G.L. c. 40A, § 3, municipalities may not "prohibit" educational uses, and may not subject them to "unreasonable" regulation. In Trustees of Tufts College v. City of Medford, 415 Mass. 753 (1993), the Supreme Judicial Court delved

more deeply into what constitutes a *reasonable* dimensional regulation under the Dover Amendment. There, the Court stated that the institution proposing an educational use:

> [Bears the] burden of proving that the local requirements are unreasonable as applied to its proposed project … by demonstrating that compliance would substantially diminish or detract from the usefulness of a proposed [educational] structure [without appreciably advancing the municipality's legitimate concerns], or impair the character of the institution's campus, without appreciably advancing the municipality's legitimate concerns, [or there is an e]xcessive cost of compliance … without significant gain in terms of municipal concerns. Id. at 759-760.

In Tufts, for example, a fifty-foot setback relative to a multi-level parking garage was held to be reasonable (and hence valid); likewise, parking and loading dock requirements for the library were reasonable since they would not frustrate the project. Id.

In Bible Speaks v. Board of Appeals of Lenox, 8 Mass. App. Ct. 19 (1979), the Appeals Court invalidated a zoning bylaw adopted by the Town of Lenox that required, for all new religious and educational uses or changes in such uses, that the applicant obtain a special permit and site plan approval. The bylaw also imposed specific dimensional regulations for all non-municipal educational uses and religious uses. Although the Court found the bulk, off-street loading and other dimensional regulations to be permissible, the special permit and the site plan approval requirements went beyond the reasonable bulk and dimensional regulations that could be imposed under Section 3. Id. at 33.

The special permit and site plan provisions were incompatible with Section 3 because they gave discretion to the local board of appeals to allow educational or religious uses based on extrinsic concerns such as the land use and planning goals of the community. Id. Such a grant of discretion would allow the board to impose restrictions that would nullify or diminish the institution's entitlement to growth and limit the types of education or religious denominations that would be welcome in the community. Id. The court held that it was precisely this type of discretion that was to be eliminated by the Dover Amendment and its progeny.

Thus, while a non-discretionary special permit procedure (assuming *arguendo* that such a procedure exists) may be utilized in narrow circumstances, "the question of reasonableness of a local zoning requirement, as applied to a proposed educational use, will depend on the particular facts of each case." Tufts, supra at 759. A municipality may not, however, "through the guise of regulating bulk and dimensional requirements under the enabling statute, proceed to 'nullify' the use exemptions permitted to an educational institution." The Bible Speaks, 8 Mass. App. Ct. at 31.

Likewise, in Trustees of Boston College v. Board of Aldermen of Newton, 58 Mass. App. Ct. 794 (2003), the City of Newton required Boston College to obtain a special permit to rebuild a structure on its campus relative to dimensional and density regulations. The Court concluded that City's regulations requiring the College "to seek discretionary relief through a super majority of the Board each time it wants to build any habitable space on the … campus … is tantamount to requiring a special permit for the educational use itself, which offends the spirt, if not the letter, of the Dover Amendment." Id., at 801. Strict application of the City's dimensional regulations "would significantly impede an educational use … without appreciably advancing municipal goals embodied in the local zoning bylaw …. **A local zoning law that improperly restrict an educational use by invalid means, such as by special permit process, may be challenged as invalid in all circumstances**." Id. (emphasis added) (internal citations omitted).

III. ***Application to the Richmond Zoning Bylaw Amendment.***

As outlined in the above cases, the Dover Amendment provides that "[n]o zoning … by-law shall prohibit, regulate or restrict the use of land or structures … for educational purposes on land owned or leased by … a nonprofit educational corporation …." G.L. c. 40A, § 3. "[T]he Dover Amendment represents a specific exception

to the general power of municipalities to adopt and enforce zoning regulations and bylaws." Regis College v. Town of Weston, 462 Mass. 280, 281 (2012).

In this case, the Bylaw is facially invalid under the Dover Amendment on a number of grounds. First, it restricts all uses of land by a nonprofit educational corporation "for Open Space and Conservation Education and Research" that charge any sort of fee or tuition for its educational courses and research. This amounts to a total prohibition on educational and research facilities, and must be disapproved as inconsistent with the Dover Amendment, which protects nonprofit educational uses regardless of their tuition or fee model. See, e.g., City of Worcester v. New England Inst. & New England Sch. of Acct., Inc., 335 Mass. 486, 493 (1957) (institution still entitled to educational use protraction where it "charges tuition" or fees); McLean Hospital Corp. v. Town of Lincoln, 483 Mass. 215 (2019) (selective "admissions process" which ostensibly includes full or partial payment for the residency and courses, held to be protected educational use).[5] In fact, with the exception of public schools that are taxpayer funded, most nonprofit educational institutions such as Mass Audubon's nature centers will be required to charge fees to provide education, research, and courses; it does not render them subject to any less protection under G.L. c. 40A, § 3.

Additionally, Section 4.8(a) and (b) of the Zoning Bylaw were amended by requiring a special permit requirement for all zoning districts for "[t]he use of land, under Section 14, for Open Space and Conservation Education and Research, provided that no fee is charged, and no off-highway motorized vehicles are permitted" and any land that is "publically promoted open space and conservation education and research." As has already been held, the Dover Amendment precludes a municipality from "impos[ing] special permit requirements … to accommodate uses not permitted as of right in a particular zoning district, on legitimate educational uses." See, e.g., The Bible Speaks, 8 Mass. App. Ct. at 33; Trustees of Boston College, 58 Mass. App. Ct. at 794, quoting Trustees of Tufts College v. Medford, 415 Mass. 753, 765 (1993) ("A local zoning law that improperly restrict an educational use by invalid means, such as by special permit process, may be challenged as invalid in all circumstances") (emphasis added).

These bylaw amendments plainly conflict with G.L. c. 40A, § 3, which preclude a municipality from enacting a zoning bylaw that "prohibit[s], regulate[s] or restrict[s] the use of land or structures … for educational purposes on land owned or leased by … a nonprofit educational corporation." Indeed, as the courts have held on numerous occasions, "[t]he Dover Amendment … exists, in part, to protect educational institutions from a municipality's exercise of preferences as to what kind of educational facilities it will welcome, 'the very kind of restrictive attitude which the Dover Amendment was intended to foreclose.'" McLean Hospital Corp. v. Town of Lincoln, 483 Mass. 215, 226, n.5 (2019). A zoning bylaw cannot require a special permit for a protected, nonprofit educational use as here, and these provisions must be stricken from the bylaw's text. Accord Attorney General v. Town of Dover, 327 Mass. 601, 604 (1951) (where there is clear conflict between bylaw and G.L. c. 40A, § 3, two "cannot stand together" and the bylaw is invalid).

CONCLUSION

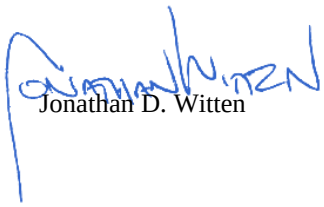
Because the amendment to the Zoning Bylaw, voted under Article 7 of the Richmond Annual Town Meeting warrant, is inconsistent with the protections afforded nonprofit educational uses under the Dover Amendment, G.L. c. 40A, § 3, it must be disapproved and deleted by the Attorney General's Office.

Thank you kindly for your attention to this important matter. Please do not hesitate to contact us with any questions.

[5] The 3East educational program at issue in the McLean Hospital case costs approximately $1,500 per day, according to publically-available information available online at https://www.mcleanhospital.org/treatment/3east.

JDW/DCB

Very truly yours,



Jonathan D. Witten

Enc.
cc: Elizabeth Goodman, Esq., Town Counsel, by electronic mail
Mass Audubon

820733/60448/0014