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December 2, 2011

**CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS  
ON THE  
NOTICE OF PROJECT CHANGE**

**PROJECT NAME** : BioSquare Phase II  
**PROJECT MUNICIPALITY** : Boston  
**PROJECT WATERSHED** : Boston Harbor  
**EEA NUMBER** : 12021  
**PROJECT PROPONENT** : Boston University and Boston Medical Center  
**DATE NOTICED IN MONITOR** : September 7, 2011

Pursuant to the Massachusetts Environmental Policy Act (MEPA) (G.L.c.30, ss. 61-62I) and Section 11.10 of the MEPA regulations (301 CMR 11.00), I have reviewed the Notice of Project Change (NPC) for this project. The NPC requests that the proponent be allowed to conduct two levels of research in the National Emerging Infectious Disease Laboratories (NEIDL) Building<sup>1</sup> prior to the submission of the Supplemental Final Environmental Impact Report (SFEIR) and the court required risk assessment. The NEIDL Building is one component of the larger BioSquare Phase II project. The proponent has identified the levels of laboratory research as Biocontainment Safety Level (BSL) laboratories, known as BSL-2 and BSL-3<sup>2</sup>. In accordance with the Certificate Following Remand on the FEIR dated September 5, 2006, the project as a whole continues to require the preparation of an SFEIR that will address the question

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<sup>1</sup> The BioSquare Phase II property is jointly owned by Boston University and Boston Medical Center. It was formerly held under the University Associates Limited partnership and is now held through the BioSquare Realty Trust. The NEIDL Building is a Boston University Project. The NEIDL Building is not located on the parcel of land transferred from the then Massachusetts Highway Department that was part of the entire BioSquare Phase II MEPA filing.

<sup>2</sup> For a description of the classification of containment levels, as established by the Centers for Disease Control and Prevention, please see the "Review of the NPC" Section of this Certificate.

of risk assessment and “worst case” scenarios that involve the risk of contagion arising from the accidental or malevolent release of a contagious pathogen. The Scope for the SFEIR issued on September 5, 2006 remains in effect.

I hereby determine that the NPC, as it pertains to BSL-2, **does not require** the preparation of an additional Environmental Impact Report (EIR). However, I am legally precluded from waiving the risk assessment for those contagious pathogens that were the subject of concern by the Superior and Supreme Judicial Courts and proposed for study by the National Institutes of Health (“NIH”), until I have been afforded the opportunity to review the risk assessment for those contagious pathogens currently being studied by NIH. The proponent should accordingly submit its completed SFEIR with its risk assessment prior to conducting BSL-3 and BSL-4 laboratory research in the NEIDL Building. Alternatively, the proponent may file a future NPC and waiver request on BSL-3 activities after NIH completes its review and BU provides sufficient information on BSL-3 to meet the requirements of the SFEIR, should the proponent still wish to proceed with BSL-3 prior to BSL-4 research.<sup>3</sup> In a separate Draft Record of Decision (DROD), also being issued today, I am proposing to grant a Phase 1 Waiver, allowing the proponent to conduct lower level BSL-2 laboratory research within the NEIDL Building in advance of the SFEIR for the project.

#### NPC Project Change Description

According to the NPC, the project change consists of the utilization of approximately 65,280 square feet (sf) of BSL-2 and BSL-3 laboratory space within the completed 192,000 sf NEIDL Building prior to the completion of the additional risk assessment/SFEIR. The proponent is currently utilizing approximately another 96,000 sf of support space for offices, clinical research and lab support. According to the proponent, BSL-2 space would occupy approximately 40,320 sf. Nearly three years after the building has been completed, the NIH’s risk assessment has not yet been completed. The proponent estimates that it may take as much as a year before the risk assessment is completed and the SFEIR is subject to my review. Before the NEIDL Building is approved for 30,720 sf of BSL-4 laboratory use, the highest BSL level for a research laboratory, the general public will be provided with an opportunity to review and comment on the risk assessment and the SFEIR, and state and federal agencies will take action approving, denying, or conditioning the BSL-4 laboratory use. Additionally, the proponent estimates that six to nine months will be needed for any applicable administrative and/or judicial review. The proponent’s best estimate is that BSL-4 research would begin no earlier than October 2013.

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<sup>3</sup> It is important to note that the NPC filed on behalf of Boston University does not request a waiver from the requirements of the SFEIR for BSL-4. Only after I have completed my review of the SFEIR and I have determined it to be adequate, will Boston University be allowed to seek its state permits to begin any BSL-4 laboratory research work.

The proponent would like to access the building for lower level biological research prior to the completion of the administrative and judicial reviews of the BSL-4 activities. The proponent has also stated that it will not commence actual BSL-3 level research until the risk assessment has been completed and considered by NIH. The proponent is accordingly seeking a "conditional approval" under MEPA. The proponent initially requested approval operate the laboratory at the BSL-2 level starting this winter and would seek additional City and State regulatory approvals necessary for BSL-3 level operations so that BSL-3 research can begin immediately following the completion of the risk assessment by NIH, without my further review of the assessment. However, on October 24, 2011, the proponent sent a clarifying letter stating that the Waiver request is not conditioned upon any other action being taken by any other agency and is not a request that I improperly delegate any of my responsibilities under MEPA to other agencies.

### Project History

In 1999, an Environmental Notification Form was submitted for the proposed project. The project required a mandatory EIR. In 2003, the DEIR was determined to be adequate. In the FEIR, the proposed project consisted of the development of 428,700 sf of medical research space, a 1,400 space parking garage (approximately 496,000 sf), and associated infrastructure on a 14.5-acre site along Albany Street in Boston. The project included the 192,000 sf NEIDL Building. The BioSquare Phase II project functions as an expansion of the BioSquare Phase I project (a.k.a. the University Associates Project, EEA #7034), which completed its EIR review process in 1991 and the Moakley Services Center Project (EEA #11883). On August 11, 2004, the FEIR for the BioSquare Phase II was determined to be adequate.

Following the issuance of that FEIR Certificate, a group of ten citizens commenced litigation against the proponent and other parties, challenging, among other things, the adequacy of the FEIR. In a Memorandum and Order dated July 31, 2006, the Court vacated the certification of the FEIR and remanded the matter to the then Secretary of Environmental Affairs for further administrative action in light of the Court's decision. Soon thereafter, the proponents petitioned the Appeals Court, pursuant to G. L. c. 231, s. 118, for interlocutory relief from the Superior Court's decision, and the matter was subsequently transferred to the Supreme Judicial Court (SJC). On December 13, 2007, the SJC rendered its decision in Allen v. BRA, et al, 450 Mass. 242 (2007), affirming the Superior Court decision and holding that: the decision on the adequacy of the final EIR was arbitrary and capricious (1) in failing to consider likely damage to the environment caused by the release of a contagious pathogen, and (2) due to the developer's failure to address alternative locations for the project. In its decision, the SJC noted that the decision on the adequacy of the final EIR was arbitrary and capricious in that the "worst case scenario put forth by the proponent inadequately addressed the consequences of a release of contagious pathogens from the BioLab, potentially denying State Agencies the opportunity to meaningfully review the environmental impact of such a release and consideration of the measures that would be necessary to mitigate environmental damage." Id. at 257.

As a result of the remand order from the Superior Court, the then Secretary issued a Certificate Following Remand on the FEIR on September 5, 2006, that required a Supplemental Final Environmental Impact Report (SFEIR). That certificate was not modified after the December 13, 2007 SJC affirmation of the Superior Court's remand<sup>4</sup>.

The project has also undergone review under the National Environmental Policy Act (NEPA), and the National Institutes of Health (NIH) completed a Final Environmental Impact Statement and issued a Record of Decision in February, 2006. In response to issues raised in a federal court proceeding regarding the NIH Final Environmental Impact Statement (FEIS), the NIH completed additional reviews of the potential impacts of the BSL-4 Biolab, including a report entitled the *Draft Supplementary Risk Assessments and Site Suitability Analyses for the National Emerging Infectious Diseases Laboratory, Boston University* (DSER)<sup>5</sup>, which was developed, in part, to address the Superior Court and SJC directive that the SFEIR provide additional worst case scenario analysis and evaluate the comparative levels of risk associated with alternative locations for the BSL-4.

In 2007, former Secretary Ian Bowles requested that the National Research Council (NRC) convene an expert committee to provide technical input on the DSER. Secretary Bowles asked that the Committee evaluate only the DSER, and not mitigation. The Committee was asked to review the DSER and meet to discuss the methodologies and analyses therein and to address the following specific questions pertaining to the scientific adequacy of the NIH Study:

- Determine if the scientific analyses in the NIH Study are sound and credible;
- Determine whether the proponent has identified representative worst case scenarios; and
- Determine, based on the study's comparison of risk associated with alternative locations, whether there is a greater risk to public health and safety from the location of the facility in one or another proposed location.

The parties agreed that the Committee's report would be limited to a technical review of the DSER, and that the Contractor, the National Research Council (NRC), would not make any findings or recommendations regarding the adequacy of any determinations or decisions made by any agency or department of the U.S. Government or the Commonwealth under NEPA or MEPA. Furthermore, NRC would not be responsible in any way for any such decisions or

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<sup>4</sup> The 2006 Certificate required the SFEIR to evaluate an additional "worst case" scenario that involved the risk of contagion arising from the accidental or malevolent release of a contagious pathogen. The 2006 Certificate further stated that, in light of the Superior Court suggestion that smallpox, SARS, and the Ebola virus as potentially representing "worst case" contagious pathogens, the SFEIR should incorporate the analysis of anthrax from the FEIR to facilitate comparison and review. The 2006 Certificate also noted that the SFEIR should identify a feasible alternative location for the biocontainment building in a less densely populated area.

<sup>5</sup> The DSER was intended to form the scientific basis of the SFEIR, which Boston University has not yet filed for MEPA review.

determinations. Thus, the questions addressed by the Committee solely pertain to the scientific adequacy of the risk assessment and other analytical methodologies used in the DSER and whether the report responds to former Secretary Bowles' questions in a scientifically sound and credible manner.

The committee's assessment was critical of the DSER, finding that it was not sound and credible, did not adequately identify and thoroughly develop worst-case scenarios, and did not contain the appropriate level of information to compare the risks associated with alternative locations. The report also raised specific concerns about agent selection, scenario development, modeling methodology, environmental justice issues, and risk communication.

As a result of the concerns raised by the NRC, NIH established its Blue Ribbon Panel (BRP) in March, 2008, to provide scientific and technical advice to NIH. This process culminated in the NRC committee delivering its third report in April, 2010, which found the proposed approaches to conducting the risk assessment suitable and well planned. Additionally, the NRC committee determined that the 13 pathogen agents selected for analysis were appropriate and comprehensive, and the expertise available on and to the assessment team seemed strong. The committee encouraged NIH and its contractor (Tetra Tech) to develop qualitative analyses (an explanation of the safety and risk profile) of all 13 pathogens in a manner that is clear and accessible to the public. The committee also suggested that the qualitative analyses in the body of the assessment be supplemented with results of quantitative modeling planned for five pathogens, with details provided in appendices. Further, the committee encouraged NIH to rely on data available from existing case studies, public health surveillance of the surrounding communities, and release incidents, not only to support its models but also to provide a complete and understandable picture for the public. The NRC committee again emphasized that the final risk assessment serve as an effective risk communication tool.

On September 22, 2010, NIH submitted and presented supplemental materials to the NRC committee, and after reviewing the material, the NRC committee concluded that it could not endorse NIH's supplemental materials and illustrative analyses. In summary, the results presented on September 22 were insufficient for the committee to find that the analyses presented thus far will lead to a scientifically and technically sound risk assessment. The illustrative results presented to date were not sufficiently documented and supported to convince the committee that the contractors are on track to completing a comprehensive risk assessment for the NEIDL facility. The committee also noted that based on the limited information provided by NIH's contractor, the information was not responsive to the committee's recommendation that qualitative analyses addressing the three questions raised in its 2008 letter report be prepared first and that these qualitative analyses then be supplemented by quantitative analysis through modeling using available data on the agents in question. The NRC committee also found that any modeling should be used in a context that reflects scientific knowledge and experience. The committee reiterated the need to include actual data based on published results in the models

where possible, and that the models be transparent and couched in the context of the risk assessment and address appropriate uncertainties. As it currently stands, BU has yet to complete its risk assessment of the 13 pathogens that are under review by the NRC committee.

Against this backdrop it is important to note two important aspects of the pending Superior Court decision: (1) the inclusion of “contagious pathogens” in its requirement for an SFEIR and (2) strong litigation language in a footnote relative to the Secretary’s inability to delegate his authority under MEPA to a federal agency. First, the Superior Court found that “no EIR regarding the Biolab project can rationally be found to comply with MEPA that failed to consider any ‘worst case’ scenario that involved the risk of contagion arising from the accidental or malevolent release of a contagious pathogen...” The NPC does not outline or examine the differentiation between the BSL-3 and BSL-4 risk assessment being undertaken by NIH. What is clear is that a risk assessment is being carried out on BSL-3 pathogens. Some comment letters have pointed out that certain BSL-3 agents may present more serious potential risks than BSL-4 agents and may be described as contagious pathogens<sup>6</sup>.

Secondly, the Superior Court has required a risk assessment for the more serious contagious pathogens and has emphasized that the Secretary may not delegate his requirement to examine the issues before MEPA to a federal authority. Specifically, the Court states: “all parties acknowledge that the Secretary may not properly delegate her responsibility to ensure an adequate Final EIR to any federal agency. Nor may she certify an inadequate EIR based on her expectation that the issues inadequately analyzed will later be adequately analyzed in a federal EIR.” Ten Residents vs. Boston Redevelopment Authority, 24 Mass. L. Rep. 324, fn10 (2006). This judicial edict continues to govern my ability to render MEPA decisions with respect to the Biolab. The ongoing risk assessment development brought about by both federal and state court decisions contains some BSL-3 pathogens, as well as BSL-4 pathogens. Therefore, in spite of the proponent’s clarifying letter, I am legally barred from acting on the proponent’s waiver request for BSL-3 level research until I am able to independently review the risk assessment for the contagious pathogens proposed for study by BU at the Biolab. I have reached this conclusion after consultation with counsel, including the Office of the Attorney General. In addition, I have requested that the Office of the Attorney General submit this Certificate to the Court as an informational filing.<sup>7</sup>

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6 In the November 7, 2007 report prepared by an expert committee that was convened by the National Research Council to review the *Draft Supplementary Risk Assessments and Site Suitability Analyses for the National Emerging Infectious Diseases Laboratory, Boston University* (DSER) that was prepared in connection with the National Environmental Policy Act, the NRC committee noted that: “Agents such as *Yersinia pestis* (pneumonic plague), influenza virus (including virulent strains), SARS virus, and highly pathogenic avian influenza virus are often studied in BSL-3 and other lower-level containment facilities.” See NRC Report, page 8. The Committee also noted that “the selection of agents for the worst case scenario was appropriately not limited to BSL-4 agents as some agents handled in BSL-3 facilities may present more serious potential risks than BSL-4 agents. Agents are categorized for BSL-4 containment because they cause deadly disease for which there is no treatment, not because they are highly infectious and cause widespread disease.” Id.

7 To differentiate BSL-3 and BSL-4 from BSL-2, I note that none of the 13 pathogens being studied in the NIH risk

Jurisdiction and Permitting

The project as a whole is subject to a mandatory EIR pursuant to Section 11.03(6)(a)(6) and (7) of the MEPA regulations because it will (1) require State Agency Permits (2) generate 3,000 or more new vehicle trips per day and 3) provide greater than 1,000 new parking spaces at a single location. It required a Vehicular Access Permit from the Massachusetts Department of Transportation (MassDOT). After it has received all the necessary reviews and approvals for lower level research operations, the proponent must obtain a Sewer Use Discharge Permit from the Massachusetts Water Resources Authority (MWRA). The project required a minor modification to an existing Urban Renewal Plan from the Boston Redevelopment Authority (BRA). The proponent was required to comply with the National Pollutant Discharge Elimination System (NPDES) General Permit for stormwater discharges from a construction site.

Because the proponent has received a transfer of state land for a portion of the project<sup>8</sup>, MEPA jurisdiction over this portion of the project subject to the land transfer is broad and extends to all aspects of the project that are likely, directly or indirectly, to cause Damage to the Environment, as defined in the MEPA regulations. In relation to this NPC and the NEIDL Building, the State Agency Action involved is a Sewer Use Discharge Permit from the MWRA.

#### REVIEW OF THE NPC

The NPC presented a description of the uses proposed for the NEIDL Building. Because the NEIDL Building is completed, the proponent has identified few environmental impacts. Traffic and parking impacts, drainage, and permitting issues were fully evaluated in the DEIR and the FEIR. The remaining issues to be reviewed, such as the risk assessment, will be addressed in the SFEIR.

As noted above, the review of the NPC is unavoidably linked to the governing court ruling as it pertains to contagious pathogens. The Centers for Disease Control and Prevention (CDC) has established standards for the classification of containment levels for biological research laboratories, known as Biocontainment Safety Levels (BSL) 1-4. BSL-1 is suitable for work involving well-characterized agents not known to consistently cause disease in healthy adult humans, and that pose minimal potential hazard to laboratory personnel and the environment. The laboratory is not necessarily separated from the building's general traffic patterns and work is generally conducted on open bench tops using standard microbiological practices. Special containment equipment and/or facility design is not required. Laboratory personnel have specific training in the procedures conducted in the laboratory and are supervised

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assessment are BSL-2 agents. While the Superior Court decision did not specifically remove BSL-2 from its risk assessment requirements, it is clear that the Court was asking that highly dangerous pathogens be examined, not the more moderate BSL-2 pathogens.

<sup>8</sup> The plaintiffs have challenged the efficacy of the transfer of land in the litigation now pending before the Superior Court, and that matter remains before the Court as well.

by a scientist with general training in microbiology or a related science. BSL-2 is similar to BSL-1 for work involving agents of moderate potential hazard to personnel and the environment. These labs have personnel with specific training in the handling of pathogenic agents, and access to the laboratory is limited when work is being conducted. Within the facility, extreme precautions are taken with contaminated sharp items. Biological safety cabinets or other physical containment equipment are used in certain procedures where aerosols or splashes may occur. No BSL-2 agents are involved in the risk assessment currently being developed by the NIH.

BSL-3 is used for clinical, diagnostic, teaching, research or production facilities where work is done with indigenous or exotic agents that may cause serious or potentially lethal disease as a result of exposure by inhalation, absorption, ingestion, or injection. The lab has special engineering and design features, and laboratory personnel have specific training in the handling of pathogens and potentially lethal agents. All procedures involving the manipulation of infectious materials are conducted within biological safety cabinets or other containment devices. Personnel may have additional personal protective equipment requirements, possibly including respiratory protection in some labs. Access is restricted to only those that have proper training and security access to work in the facility.

BSL-4 is required for work with dangerous and exotic agents that pose a high individual risk of lab infections and life-threatening disease and for which there is no vaccine and no cure. The lab staff has specific and thorough training in the handling of extremely hazardous infectious agents, the use and function of primary and secondary containment, and the standard lab practices and procedures. The lab director strictly controls access to the lab, which is either in a separate building or in a controlled secured area within a building completely isolated from all of the building areas. A special training program for staff is required, including training on personal protective equipment (positive pressure suit). A specific facility operations manual is prepared or adopted.

Upon issuance of a Final Record of Decision, granting BU's waiver request for BSL-2 activities, the MWRA can issue a Sewer Use Discharge Permit to the proponent for BSL-2 activities at the laboratory. All research proposals at the NEIDL Building will be reviewed and approved in advance by the Boston University Institutional Biosafety Committee (IBC). The IBC has two community representatives on it. There is an NEIDL Community Liaison Committee (CLC) with six community representatives serving on it for the research laboratory. The CLC will review all work proposed at the facility and advise the community on planned research activities.

### Waiver Request

As noted above and as set forth more fully in the DROD also being issued today, the proponent has requested a Waiver to allow for the utilization of approximately 65,280 sf of low level laboratory research space within the 192,000 sf NEIDL building prior to completion of the

risk assessment/SFEIR. Based upon my review of the NPC and the comments received, I have proposed to grant the Waiver, but only for BSL-2 laboratory research activities containing approximately 40,320 sf. The proponent currently utilizes 96,000 sf of space within the building for support service, such as office, clinical research, and lab support. The DROD will be noticed for public comment and contains conditions to ensure that the impacts from utilization of the low level laboratory research space are avoided, minimized, and mitigated to the maximum extent feasible. The cumulative impacts of the project and the utilization of BSL-3 and BSL-4 laboratory research space will be further addressed in the risk assessment/SFEIR.

I acknowledge the comments and concerns expressed by many commenters. However, I do not believe that the impacts from the utilization of BSL-2 laboratory research space warrants the preparation of an EIR under the applicable provisions of the MEPA regulations, or under the requirements of the Superior Court decision as upheld by the SJC. I am also confident that the risk assessment for the project can be fully reviewed in the context of the SFEIR. The proponent has represented that the only risks associated with the project lie in the research that will be performed in BSL-4 laboratories. After reviewing the SJC and Superior Court decisions, I note that the SFEIR includes laboratory research that may qualify as BSL-3 and BSL-4. The threat or risk from laboratory research will be from research on extremely contagious biological agents that could pose serious harm to an already compromised Environmental Justice community in Boston's South End neighborhood. The proponent should continue to work with community members to address their ongoing concerns.

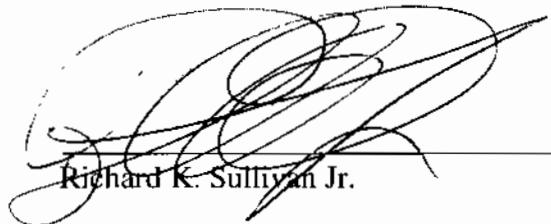
The SFEIR should also address the Metropolitan Area Planning Council's concern regarding the transport of hazardous materials to and from the project site.

### Conclusion

Based upon a review of the NPC and the comments received, I have proposed in a separate DROD issued today to grant a Phase 1 Waiver for utilization of the NEIDL building for BSL-2 low level research prior to the completion of a risk assessment by the NIH and the subsequent submittal of the SFEIR.

December 2, 2011

Date



Richard K. Sullivan Jr.

## Comments received:

Boston Public Health Commission, 8/31/11  
Association of Independent College and Universities in Massachusetts, 8/31/11  
Fort Point Associates, 9/1/11  
Joanie Parker, 9/1/11  
Lynn Klotz, 9/1/11  
Conference of Boston Teaching Hospitals, 9/2/11  
Michele D. Maniscalco, 9/2/11  
MassBio, 9/6/11  
Elizabeth Glenn, 9/6/11  
John Saylor, 9/6/11  
Chris Knighton, 9/6/11  
Nathan Seavey, 9/6/11  
Monica Spicher, 9/6/11  
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Kyla Neilan, 9/6/11  
Associated Industries of Massachusetts, 9/7/11  
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Diana M. Nugent, 9/8/11  
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Robina E. Folland, 9/8/11  
Robert Donahue, 9/8/11  
Donna M. Ambrosino, MD, 9/8/11  
Eleanor MacLellan, 9/8/11  
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Elizabeth Claggett-Borne, 9/8/11  
Paul Saint-Amand, 9/8/11  
Daniel Verinder, 9/8/11  
Michael Bleiweiss, 9/9/11  
Phyllis J. Miller, 9/9/11  
Greater Boston Chamber, 9/9/11  
Kenneth Ryan, 9/9/11  
Dana-Farber/Harvard Cancer Center, 9/9/11  
John Tonkiss, 9/9/11  
Rebecca Gloe, 9/9/11  
Jonathan Freedman, 9/9/11  
Constance Phillips, 9/9/11  
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Rachel Mia Leone, 9/10/11  
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Brigham and Women's Hospital, President, 9/13/11  
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Patricia Aron, 9/14/11  
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Terri North, 9/16/11  
Jennifer Carter-Battaglino, 9/16/11  
Matthew Lubs, 9/16/11

Kenmore Association, 9/16/11  
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Diane Chalifour, 9/16/11  
Greater Roslindale Health Organization, 9/16/11  
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Kerry Kareta, 9/16/11  
Briana Dworkin, 9/16/11  
Lucien Clalifour, 9/16/11  
Rob Consalvo, Boston City Councillor, 9/16/11  
Noah Carbulon, 9/16/11  
Cornelia A. Sullivan, 9/16/11  
Occupational Health and Delivering Results, 9/19/11  
Martin Ludlow, 9/19/11  
Michael Wilson, 9/19/11  
Inquilinos Boricuas En Accion, 9/19/11  
Nancy Wrenn, 9/19/11  
Sara Willig, 9/19/11  
Susan M. Mortimer, 9/19/11  
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Bill Donahue, 9/19/11  
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Keith Collins, 9/19/11  
Kevin Turner, 9/19/11  
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Theodore L. Walsh, 9/19/11  
Joseph T. Walsh, 9/19/11  
Deborah J. Walsh, 9/19/11  
Christopher Brayton, 9/20/11  
Kristina Brauburger, 9/20/11  
Nancy Clinton, 9/20/11  
Emily Nelson, 9/20/11  
Igor Kramnik, 9/20/11  
Kristina Schmidt, 9/20/11  
Adam Hume, 9/20/11  
Stephen A. N. Goldstein, Provost, Boston University, 9/20/11  
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Constantino Buttiglieri, 9/20/11  
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Thomas D. Tullius, 9/20/11  
Daniel Remick, Boston Medical, 9/20/11  
Julie B. Pinkham & Donna Kelly, Massachusetts Nurses Association, 9/20/11  
Kenneth King, 9/20/11  
Jeffrey W. Hunter, Dean of Boston University School of Dental Medicine, 9/20/11  
Boston City Councilors, Arroyo, Jackson, Pressley & Yancey, 9/21/11  
Alan M. Garber, Provost and Jeffrey S. Flier, Dean, Harvard Medical School, 9/21/11  
Christopher J. Menard, 9/21/11  
Kevin M. Tuohey, 9/21/11  
Elizabeth Walsh, 9/21/11  
David H. Farb, Professor & Chair, Boston University Department of Pharmacology..., 9/21/11

Pax Christi Western Massachusetts, 9/21/11  
James Jennings, Tufts University, 9/21/11  
Samuel M. Bauer, 9/21/11  
Fort Point Associates, 9/22/11  
Fort Point Associates, 9/22/11  
Newmarket Business Association, 9/22/11  
Alexander Norbash, MD, Boston Medical, 9/22/11  
R.P.F. Security Associates, 9/22/11  
Sherwood S. Hughes, 9/22/11  
James F. English, 9/23/11  
Maira E. English, 9/23/11  
Alan B. Dittrich, 9/23/11  
Massachusetts Water Resources Authority, 9/26/11  
Thomas G. Robbins, 9/26/11  
Willis G. Wang, 9/26/11  
Sheila E. Grove, 9/26/11  
Scott S. Pare', 9/26/11  
John A. Porco, Professor of Chemistry, Boston University, 9/26/11  
James P. Keeney, 9/26/11  
Judith Olejnik, 9/26/11  
Boston Imaging Core Lab, 9/26/11  
Metropolitan Area Planning Council, 9/26/11  
359 Signed Postcards Supporting Boston University's Waiver Request, 9/27/11  
Council for Responsible Genetics, 9/27/11  
Stephen P. Burgay, 9/27/11  
South Boston Community Health Center, 9/27/11  
Michael Welsh, 9/27/11  
Karen H. Antman, 9/27/11  
Conservation Law Foundation, 9/27/11  
Watertown Citizens for Environmental Safety, 9/27/11  
Anderson & Krieger, 9/27/11  
3 Signed Postcards Supporting Boston University's Waiver Request, 9/28/11  
Spillane & Spillane, 9/28/11  
Karen Freund, 9/30/11  
Representative Charles A. Murphy, 9/30/11  
Representative Thomas A. Golden, Jr., 9/30/11  
Linda K. Lukas, 9/30/11  
Representative Harold P. Naughton, Jr., 9/30/11  
Community Development Corporation of Boston, 10/3/11  
Francisco Tapia, 10/4/11  
Alliance Detective & Security Service, 10/4/11  
Mass Housing, Director of Public Safety, 10/4/11

College Bound Dorchester, 10/4/11  
Primitiva Tapia, 10/4/11  
Mass Housing, Seline Moreno, 10/4/11  
Kimberly K. Russell-Lucas, 10/4/11  
Pat Augustine, 10/4/11  
Constance Phillips, Boston University School of Medicine, 10/5/11  
Jian Huan Wu, 10/5/11  
Marisa Lopez, 10/5/11  
Raysa Tapia, 10/5/11  
Suzeth L. Dunn, 10/5/11  
Senator Sonia Chang-Diaz, 10/6/11  
Foley Hoag, 11/11/11  
Representative Gloria L. Fox, 10/17/11  
Anderson & Krieger, 10/19/11  
Fort Point Associates, 10/24/11  
Representative Byron Rushing, 10/25/11  
6 Signed Postcards Supporting Boston University's Waiver Request, 11/2/11

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RKS/WTG