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May 11, 2022

Town of Wareham  
Zoning Board of Appeals  
505 Main Street  
Wareham, MA 02571

RE: Enterprise Rent-A-Car Company of Boston LLC, Applicant  
Subject Property Address: 2196 Cranberry Highway, Wareham, MA

Dear Mr. Chairman and Members of the Board:

The applicant set forth above has applied for a USE Variance on Lot 103 on Wareham Assessor's Map 1000. The reason for this application is that the applicant is desirous of establishing a motor vehicle rental facility.

The applicant had previously submitted the application with the understanding that a special permit may be needed. The applicant was advised that a special permit would not be the appropriate redress, and that a use variance is required. The change results from and is a result of the denial letter from the Wareham Department of Inspectional Services that indicated that "[t]he proposed use as a care rental agency does not appear in the Zoning Bylaws as an allowed use .... Therefore you will need to apply to the Wareham Zoning Board of Appeals for a Variance under Section 313," **See denial letter as Attachment "A"**.

The applicant respectfully takes issue with the denial letter, and suggests to this Honorable Board that a car rental agency or “facility” (as set forth in the application) is perhaps a permitted use as it is a retail outlet not otherwise prohibited. The 2018 ZBA By-Laws set forth what commercial uses are permissible, in what area, and distinguishing motor vehicle service and sales, but not rental facility. The argument is by default this is a retail outlet not prohibited in CS. **See Attachment “B” as applicable reference to Wareham ZBA By-Laws.**

In further support of the book Definition & Examples of Retailers by Matthew Hudson who writes:

A retailer, or merchant, is an entity that sells goods such as clothing, groceries, or cars directly to consumers through various distribution channels with the goal of earning a profit. This merchant can operate in a physical building or online.

Retailers are the consumer-facing part of the supply chain, and most people interact with them frequently. They come in all different, types, styles, and sizes. (emphasis supplied)

Hudson, Matthew, Definitions & Examples of Retailers, 2020.

Here, the Wareham ZBA By-Laws specifically regulate motor vehicle and sales but not rental; therefore, by argument it is an allowed use under CS. **See Attachment “B” as applicable reference to Wareham ZBA By-Laws.**

In further support, and by way of example other Massachusetts towns/cities do specifically regulate car rental uses: but Wareham does not. **See Attachment “C” as reference to City of Cambridge ZBA Ordinance** which specifically designates rental agency as apart from a retail outlet.

In the alternative, the applicant makes his argument for a variance. Massachusetts General Laws Chapter 40A, as you well know, states that a variance can be granted if the following criteria are met.

Owing to circumstances relating to the soil conditions, shape, or topography of such land or structures and especially affecting such land or structures but not affecting generally the zoning district in which it is located, a literal enforcement of the provisions of the ordinance or by-law would involve substantial hardship, financial or otherwise, to the petitioner or applicant and that desirable relief may be granted without substantial detriment to the public good and without nullifying or substantial detriment to the public good

The petitioners are from Boston, MA and currently doing business relating to their rental operation from Burlington, MA and other retail outlets in the Commonwealth. It is much easier to enhance the operation of the rental operation by having the business next to Exit 2 of Interstate 495 than it would be to have the operation in other distant locations which results in a hardship, financial, or otherwise because of the time lost to potential customers, and/or complete loss of the customer, who may do business elsewhere because they need services forthwith and access thereto.

In considering the applicant's petition it should be noted that some derogation from the by-law purpose is anticipated by every variance. Otherwise the denial of relief on the basis of a slight or insubstantial departure from the goals of the by-law will prohibit the grant of any variance. Cavanaugh vs DiFlumera, 9 Mass. App. Ct. 400.

The matter of use variances has been addressed in seminal cases heard and decided by the Supreme Judicial Court. In particular, Boston Edison Company vs. Boston Redevelopment Authority, 374 Mass. 37 (1977) sheds light on the instant matter before the Board in relation to "use" variances. In that case the electric company proposed construction of an energy plant and distribution facility. A finding was initially made that the proposed construction was for a commercial use and not an industrial use and the Court goes on to state that a zoning variance under c. 652, Section 13 ... is very similar to one of the standards for the grant of a variance from the zoning code under G.L. c. 40A. Boston Edison, pg. 64.



The Court goes on to address cases supported by Edison and then says:

The inquiry which these cases require is whether the introduction of the nonconforming use 'would unquestionably alter the essential character of an otherwise residential neighborhood.'  
Atherton v. Board of Appeals of Bourne, supra at 455. See Benjamin v. Board of Appeals of Swansea, supra at 261-262; Phillips v. Board of Appeals of the Bldg. Dep't of Springfield. Thus, rather than establishing a rigid rule of law, these cases indicate that the proper approach for determining whether a variance should be granted involves consideration of the property uses existing in the area in relation to the specific new use proposed. [Note 20]. emphasis supplied.

Boston Edison, Pg. 66

The Court states in Note 20: "... When such mixed uses are present in an area, the standard for determining whether a variance should be granted often seems to be less strictly applied. See Kairis v. Board of Appeal of Cambridge, 337 Mass. 528. (1958)."

Boston Edison, Note 20

By all accounts, the case law is clear that a request for a use variance is different than a request for a dimensional variance, and by its very nature matters of soil, shape and topography are not pertinent or related in kind to a use variance. Further, a use variance is governed by the same hardship standard to which the applicant has expressed and detailed above.

**Accordingly and in relation to the above, in order to grant the variances requested, the board must make findings as to each of the three (3) requirements of section 10 as follows:**

- 1.) "owing to circumstances relating to the soil conditions, shape, or topography of such land or structures but not affecting generally the zoning district in which it is located,"

**Here, the topography of the land is unique in that there is a natural berm or boundary consisting of shrubbery and trees that separate the subject land from surrounding rear parcel and the Wareham District Court. The circumstances owe particular relevance to the nature of the proposed rental use; in that, the very nature of the use . . . subjects any designated area to increased and sustained activity and perhaps some noise levels. Having the natural berm, (which is owing**



to the circumstances of the topography), addresses and nullifies, for all intents and purposes, this concern.

See Pictures as Attachment "D".

- 2.) "A literal enforcement of the provisions of the ordinance or by-law would involve substantial hardship, financial, or otherwise, to the petitioner"

Here, the hardship to the petitioner is real and the hardship is substantial in that the rental industry, like many other segments of the economy, is evolving into niche markets. Here, Enterprise Rent-A-Car Company of Boston, LLC. hopes to capitalize on a new and developing market share that relies on smaller quantities of goods being delivered faster. Enterprise facilities are smaller and they operate more efficiently in convenient locations.

Having the Enterprise business next to the Exit 2 of I-495 will greatly enhance or insure that when customers place a reservation then Enterprise Rent-A-Car Company of Boston, LLC. can provide the vehicle at a location less than a minute from the Exit of a major interstate highway.

If Enterprise Rent-A-Car Company of Boston, LLC. is unable to immediately provide this service, then they incur a substantial financial hardship related to loss of business.

Additionally, another hardship falling in the category of "or otherwise" is the functionality of having vehicles near the office increases the safety of the retail use on the property in that there is ongoing surveillance and direction given immediately to customers.

In sum, no one factor determines the question of what is practical difficulty or necessary hardship, but all relevant factors, when taken together, must indicate the plight of the premises in question is unique in that they cannot be reasonably put to a conforming use. Brackett vs Bd. of Appeals of Boston, 311 Mass at 60; also see Boyajian vs, Bd. Of Appeals of Wellesley, 6 Mass. App. Ct. 283 (1978).

- 3.) "Desirable relief may be granted without substantial detriment to the public good and without nullifying or substantially derogating from the intent or purpose of such ordinance or by-law."

Here, the proposed use is closely related to the uses already in place in the area, and there would seem little if any detriment to the public good associated with the relief of allowing the rental operation. In fact, there is a close relationship of

rental cars needing gas from across the street which would seem not to nullify nor derogate from the intent of the zoned area.

For all of the above reasons, the applicants requests relief.

Respectfully submitted,

A handwritten signature in blue ink, appearing to read "T A Ciaffoni". The signature is written in a cursive, flowing style.

Timothy A. Ciaffoni, Esq.

# Attachment “A”

Denial Letter





**TOWN OF WAREHAM**  
**Department of Inspectional Services**

54 Marion Road  
Wareham, Massachusetts 02571  
(508) 291-3100, Ext. 3190

David R. Moore  
Interim Building Commissioner

April 6, 2022

Katelyn O'Neil  
405 West St.  
Bridgewater, MA 02379

**Re: 2196 Cranberry Highway/ Car Rental**

The parcel at this location lies within a Commercial Strip Zone. The proposed use as a car rental agency does not appear in The Zoning Bylaws as an allowed use.

Therefore, you will need to apply to the Wareham Zoning Board of Appeals for a Variance under Section 313.

You have 30 days in which to appeal this decision or you may apply to the Zoning Board of Appeals for the variance. If you have any further questions please contact my office.

Sincerely,

David R. Moore

# Attachment “B”

Relevant Sections of Wareham ZBA  
By-Laws

# ZONING BY-LAWS



Town of  
**WAREHAM**

Massachusetts

*Revised October 9, 2019*



PRINCIPAL USE	R130	R60	R43	R30	MR30	WV1	WV2	OV1	OV2	CS	CG	CP	CNF	MAR	INS	IND
<b>Educational and Institutional Uses</b>																
Municipal use	N	N	N	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y
Hospital, medical related facility	N	N	N	SPZ	Y	N	N	N	N	Y	Y	N	N	N	Y	N
Nursing home, intermediate care center	SPZ	SPZ	SPZ	SPZ	N	Y	SPZ	N	Y	Y	SPZ	SPZ	N	N	Y	SPZ
Day care center	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Educational use, non-exempt	SPZ	Y	Y	Y	N	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y
Educational use, exempt	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y
Oceanographic and engineering research	N	N	N	N	N	Y	N	N	N	N	Y	Y	N	Y	Y	SPZ
Membership club					N					N	N	N				
Religious use	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	N	N	Y	Y	Y	Y
Other places of assembly	N	N	N	N	N	SPZ	N	SPZ	N	Y	Y	SPZ	N	N	Y	Y
Cemetery	SPZ	SPZ	SPZ	SPZ	SPZ	N	N	N	N	SPZ	SPZ	SPZ	N	N	N	N
Medical Marijuana Treatment Center	N	N	N	N	N	N	N	N	N	N	N	N	N	N	Y	N
Marijuana Establishments	N	N	N	N	N	N	N	N	N	SPZ*	N	N	N	N	SPZ	SPZ
<b>Commercial Uses</b>																
Banks	N	N	N	N	N	Y	N	Y	Y	Y	Y	Y	N	N	N	Y
Offices	N	N	N	N	N	Y	Y	Y	Y	Y	Y	Y	N	N	Y	Y
Laboratory / research office																
Retail businesses	N	N	N	N	N	Y	N	Y	Y	Y	Y	Y	N	N	N	N
Service establishments not involving manufacture on premise	N	N	N	N	N	Y	N	Y	Y	N	Y	Y	N	N	N	Y
Motor vehicle service	N	N	N	N	N	Y	N	Y	N	SPZ	SPZ	SPZ	N	N	N	Y
Motor vehicle sales	N	N	N	N	N	Y	N	Y	N	SPZ	SPZ	SPZ	N	N	N	N
Filling stations for gasoline, diesel fuel, liquid propane	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N
Dry cleaning, drop off / pick up only	N	N	N	N	N	Y	N	Y	Y	N	Y	Y	N	N	N	N
Laundromat	N	N	N	N	N	Y	N	Y	Y	Y	Y	Y	N	N	N	N
Conference Center																
Motel, hotel	N	N	N	N	N	N	N	Y	Y	Y	Y	Y	Y	N	N	N
Bed & Breakfast	N	N	N	N	N	Y	N	Y	Y	Y	SPZ	Y	Y	N	N	N
Guest house	N	N	N	N	N	Y	Y	Y	Y	Y	Y	Y	N	N	N	N
Neighborhood convenience store	N	N	N	N	N	Y	Y	Y	Y	N	Y	Y	N	N	N	N
Wholesale business	SPZ	SPZ	N	SPZ	SPZ	Y	SPZ	Y	Y	Y	Y	Y	N	N	N	N
Restaurant	N	N	N	N	N	Y	N	Y	Y	Y	SPZ	SPZ	N	N	N	Y
Restaurant Drive through	N	N	N	N	N	Y	N	Y	Y	Y	Y	Y	N	N	N	N
Non-food Drive in/ Drive through establishment	N	N	N	N	N	N	N	N	N	N	SPZ	SPZ	N	N	N	N
Commercial recreational facilities	N	N	N	N	N	N	N	N	N	Y	N	SPZ	N	N	N	N
Other places of amusement	N	N	N	N	N	SPZ	N	SPZ	N	Y	N	N	N	N	N	N

\*East of Glen Charlie Road, Depot Street, and Great Neck Road, and otherwise not allowed



PRINCIPAL USE	R130	R60	R43	R30	MR30	WV1	WV2	OV1	OV2	CS	CG	CP	CNF	MAR	INS	IND
Adult use	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	SPZ
<b>Marine Uses</b>																
Marinas	N	N	N	N	N	Y	N	Y	N	N	N	N	N	Y	N	Y
Retail sale of marine equipment and supplies (not including fish products or food)	N	N	N	N	N	Y	N	Y	N	Y	Y	Y	N	Y	N	Y
<b>Utility</b>																
Public utility	SPZ	SPZ	SPZ	SPZ	SPZ	N	N	Y	N	N	Y	Y	N	N	N	Y
Public utility structures for public utility use not including repair stations or outside storage of supplies	SPZ	SPZ	SPZ	SPZ	SPZ	SPZ	SPZ	SPZ	SPZ	Y	Y	Y	SPZ	SPZ	SPZ	Y
Wireless communication facility, not exceeding 40 feet in height	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Wireless communication facility, exceeding 40 feet in height	SPZ	SPZ	SPZ	SPZ	SPZ	SPZ	SPZ	SPZ	SPZ	SPZ	SPZ	SPZ	SPZ	SPZ	SPZ	SPZ
Large ground-mounted solar energy	SPR	SPR	N	N	N	N	N	N	N	N	SPZ	SPZ	N	N	N	N
<b>Industrial Uses</b>																
Manufacturing of products produced on premises the major portion of which are sold on premises from producer to consumer	N	N	N	N	N	N	N	N	N	SPZ	SPZ	SPZ	N	N	N	Y
Light manufacturing	N	N	N	N	N	Y	N	N	N	N	N	N	N	Y	N	Y
Manufacturing of marine vessels	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	SPZ
Industrial (except earth removal)	N	N	N	N	N	N	N	N	N	SPZ	N	N	N	N	N	SPZ
Gravel, loam, sand, stone, or earth removal	N*	SPZ	SPZ	SPZ	SPZ	N	N	N	N	SPZ	N	N	N	N	N	SPZ
Fish processing plants	N	N	N	N	N	N	N	N	N	SPZ	N	N	N	N	N	N
Storage facilities	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N
Junkyards and salvage yards	N	N	N	N	SPZ	N	N	N	N	SPZ	N	N	N	N	N	N
Hazardous waste facility	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	Y
Solid waste facility	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	Y
<b>Transportation Uses</b>																
Aviation field	N	SPZ	N	SPZ	N	N	N	N	N	N	N	N	N	N	N	N
Public service or other passenger station	N	N	N	SPZ	N	N	N	N	N	Y	SPZ	SPZ	N	N	N	Y
Trucking and transportation terminals	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	SPZ

# Attachment “C”

Relevant Sections of City of Cambridge Ordinance



### ON-LINE ZONING ORDINANCE DISCLAIMER

The Web version of the City of Cambridge, Massachusetts Zoning Ordinance is provided for reference and the convenience of having the Ordinance in a computer-readable format. The print version of the Zoning Ordinance, together with any amendments adopted by the City Council subsequent to the most recent update to the print version, remains the official version of the Ordinance. If any discrepancies exist between the print and web versions of the Zoning Ordinance, the print version, together with any City Council amendments, shall be considered correct. Recent amendments to the Zoning Ordinance may appear on the Web prior to being incorporated into the print version of the Ordinance.

Open Space	Res A 1&2	Res B	Res C, C-1, C-1A	Off 1, 2A, 2B, 3A, 3B, 3A	Bus A-1, A-2, A-3 <sup>1</sup>	Bus A, A-4	Bus B, B-1, B-2	Bus C, C-1	Ind A-1, A-2	Ind A	Ind B-1, B-2	Ind B	Ind C
No	No	No	No <sup>9</sup>	Yes	Yes	Yes	Yes <sup>10</sup>	Yes	Yes	Yes	Yes	Yes	Yes
No	No	No	No <sup>9</sup>	Yes	Yes	Yes	Yes <sup>10</sup>	Yes	Yes	Yes	Yes	Yes	Yes
No	No	No	No <sup>9</sup>	Yes	Yes	Yes	Yes <sup>10</sup>	Yes	Yes	Yes	Yes	Yes	Yes
No	No	No	No <sup>9</sup>	Yes	Yes	Yes	Yes <sup>10</sup>	Yes	Yes	Yes	Yes	Yes	Yes
No	No	No	No <sup>9</sup>	Yes	Yes	Yes	Yes <sup>10</sup>	Yes	Yes	Yes	SP	Yes	Yes
No	No	No	No <sup>9</sup>	Yes	Yes	Yes	Yes <sup>10</sup>	Yes	Yes	Yes	Yes	Yes	Yes

**4.34 Office and Laboratory Use**

- a. Office of a physician, dentist or other medical practitioner not located in a clinic listed under Subsection 4.33(d).
- b. Office of an accountant, attorney, or other non-medical professional person (includes properly licensed massage therapists)
- c. Real Estate, insurance or other agency office
- d. General office use
- e. Bank, trust company or similar financial institution
- f. Technical office for research and development, laboratory & research facility subject to the restrictions in Section 4.21m

**4.35 Retail Business and Consumer Service Establishments**

- a. Store for retail sale of merchandise <sup>23</sup>
  - 1. Establishment providing convenience goods such as drug stores, food stores, tobacco, newspaper and magazine stores, variety stores, and liquor stores. <sup>24</sup>
  - 2. Other retail establishments
- b. Place for the manufacturing, assembly or packaging of consumer goods <sup>25</sup>
- c. Barber shop, beauty shop, laundry and dry cleaning pickup agency, shoe repair, self-service laundry or other similar establishment
- d. Hand laundry, dry cleaning or tailoring shop <sup>26</sup>

	Open Space	Res A 1&2	Res B	Res 2, 2A, 2B, 3, 3A, 3B, 3, 3A, 3B, 3, 3A, 3B	Off 1, 2A, 2, 3, 3A	Bus A-1, A-2, A-3, 1, 2, 3, 3A	Bus B, B-1, B-2	Bus C, C-1	Ind A-1, A-2	Ind A	Ind B-1, B-2	Ind B	Ind C
e. Lunchroom, restaurant, cafeteria <sup>27</sup>	No	No	No	No	No <sup>12</sup>	Yes	Yes <sup>10</sup>	Yes	Yes	Yes	No <sup>51</sup>	Yes	Yes
f. Establishments where alcoholic beverages are sold and consumed and where no dancing or entertainment is provided													
1. Lunchroom, restaurant, cafeteria	No	No	No	No	No <sup>12</sup>	Yes	Yes <sup>10</sup>	Yes	Yes <sup>28</sup>	Yes	No <sup>51</sup>	Yes	Yes
2. Bar, saloon, or other establishment serving alcoholic beverages but which is not licensed to prepare or serve food	No	No	No	No	No <sup>12</sup>	Yes	Yes <sup>13</sup>	Yes	SP <sup>28</sup>	Yes	No <sup>51</sup>	Yes	SP
g. Bar or other establishment where alcoholic beverages are sold and consumed and where dancing and entertainment is provided. Dance hall or similar place of entertainment	No	No	No	No	No	No	Yes <sup>13</sup>	Yes	No	Yes	No <sup>51</sup>	Yes	PUD
h. Theatre or hall for public gatherings	No <sup>11</sup>	No	No	No	SP	SP	Yes <sup>10</sup>	Yes	SP	Yes	No <sup>51</sup>	Yes	PUD
i. Commercial recreation	No <sup>11</sup>	No	No	No	No	SP	SP <sup>10</sup>	SP	SP	SP	No <sup>14, 51</sup>	SP	PUD
j. Mortuary, undertaking or funeral establishment	No	No	No	No	SP	Yes	Yes <sup>10</sup>	Yes	Yes	Yes	No <sup>51</sup>	Yes	No
k. Printing shop, photographer's studio	No	No	No	No	SP	Yes	Yes <sup>10</sup>	Yes	Yes	Yes	No <sup>51</sup>	Yes	Yes
l. Veterinary establishment, kennel, pet shop or similar establishment <sup>29</sup>	No	No	No	No	No	SP	SP <sup>10</sup>	SP	SP	SP	No <sup>51</sup>	SP	No
m. Sales place for new and used car, rental agency for autos, trailers and motorcycles <sup>30</sup>	No	No	No	No	Yes	Yes	Yes <sup>10</sup>	Yes	SP	Yes	No <sup>51</sup>	Yes	PUD
n. Office including display or sales space of a wholesale, jobbing or similar establishment <sup>31</sup>	No	No	No	No	No	SP	Yes <sup>10</sup>	Yes	Yes	Yes	Yes <sup>51</sup>	Yes	Yes
o. Fast Order Food Establishment	No	No	No	No	No	No	SP <sup>10</sup>	SP	No	SP	No <sup>51</sup>	SP	PUD
p. Deleted													
q. Art/Craft Studio	No	No	No	SP <sup>50</sup>	SP <sup>50</sup>	Yes	Yes	Yes	Yes	Yes	Yes <sup>51</sup>	Yes	Yes
r. Bakery, Retail	No	No	No	No	No	Yes	Yes <sup>10</sup>	Yes	Yes	Yes	No <sup>51</sup>	Yes	PUD
s. Registered Marijuana Dispensary	No	No	No	No	No	No	PB	PB	PB	No	PB	No	No

	Open Space	Res A 1&2	Res B	Res			Bus A-1, A-2, A-31	Bus B, B-1, B-2	Bus C, C-1	Ind A-1, A-2	Ind A	Ind B-1, B-2	Ind B	Ind C
				C, C-1, C-1A	2, 2A, 2B, 3, 3A, 3B, 3, 3A	Off 1, 2A, 2, 3, 3A								

**4.36 Open Air or Drive In Retail & Service**

- a. Sales place for flowers, garden supplies agricultural produce conducted partly or wholly outdoors; commercial greenhouse or garden
- b. Automobile oriented fast order food service establishment
- c. Drive in bank and other retail or consumer service establishment where motorist does not have to leave his or her car
- d. Outdoor amusement park, outdoor sports facility conducted for profit
- e. Open air or drive in theatre or other open air place of entertainment
- f. Sale of new or used cars conducted partly or wholly on open lots, or rental agency for automobiles, trailer, motorcycles, conducted partly or wholly outdoors
- g. Automobile service station where no major repairs are made <sup>32</sup>
- h. Car washing establishment using mechanical equipment for the purpose of cleaning automobiles and other vehicles
- i. Place for exhibition, lettering or sale of gravestones

**4.37 Light Industry, Wholesale Business and Storage**

- a. Assembly or packaging of articles <sup>33</sup>
- b. Manufacturing, processing, assembly and packaging the following: <sup>34</sup>
  - 1. Clothing, but not the manufacture of the cloth or other material of which the clothing is made

No	No	No	No	No	No	Yes	No	No	Yes	Yes	No	Yes	Yes	Yes
No	No	No	No	No	No	SP	No	SP	No	SP	No	SP	SP	No
No	No	No	No	No	No	No	No	No	No	Yes	No	No	Yes	No
No	No	No	No	No	No	No	No	No	No	Yes	No	Yes	Yes	SP
No	No	No	No	No	No	SP	SP <sup>13</sup>	No	No	SP	No	No	SP	No
No	No	No	No	No	No	SP	SP	SP	No	Yes	SP	Yes	Yes	SP
No	No	No	No	No	No	No	No	No	No	Yes	Yes	No	Yes	No
No	No	No	No	No	No	No	No	No	Yes	Yes	Yes <sup>14</sup>	Yes	Yes	Yes
No	No	No	No	No	No	No	No	No	Yes	Yes	Yes	Yes	Yes	Yes



# Attachment “D”

Pictures











