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November 13, 2025

Senator Michael J. Barrett, Chair
Rep. Mark J. Cusack, Chair
Joint Committee on Telecommunications, Utilities, and Energy
Massachusetts State House
24 Beacon Street
Boston, MA 02133

Dear Chairs Barrett and Cusack,

My name is Mariellen Morris, and I serve as Executive Director of the LSP Association, Inc. (LSPA), a nonprofit organization representing Licensed Site Professionals (LSPs) and other environmental practitioners who oversee the assessment and cleanup of contaminated sites across Massachusetts. I am writing regarding H.3471, *An Act Requiring Disclosure to Consumers Regarding Home Heating Oil Insurance*, now before the Joint Committee on Telecommunications, Utilities, and Energy.

History
The LSPA appreciates the intent of this bill—to better educate consumers—but we've long advocated for a stronger, fairer solution: legislation that makes coverage for home heating oil spills automatically included in homeowners' insurance policies.

In 2009, a law was enacted requiring insurance companies offer an optional rider for home heating oil spill protection. But, because insurance companies were only required to make coverage available—not to actually inform customers of the coverage—most homeowners never learned about it. Even when notified in writing, as was done with the Massachusetts FAIR Plan, very few opted in. Today, only about 19% of homeowners who heat with oil have this coverage.

Experience has shown that education alone doesn't work. Even the Massachusetts Insurance Federation acknowledged that earlier this year in their testimony to the Joint Committee on Financial Services regarding bills H.1302/S.813, *An Act relative to the remediation of home heating oil releases*.

Consequently, families who rely on oil heat remain vulnerable to financial hardship or even ruin, as oil spill cleanups can range from $20,000 for minor incidents to over $300,000 for complex releases. Unaddressed oil spills, due to financial constraints, can also have severe human health and environmental consequences, such as when drinking water supply wells or indoor air becomes contaminated.

As such, we urge you to issue a negative report on H.3471 and instead support H.1302 and S.813—bills that would require insurance companies to automatically include this coverage in existing homeowners insurance policies, just as they do for accidents involving gas or electric heating systems. Why are we so set on creating a separate standard for families who heat with oil — many of whom have no other option?

Concerns with H.3471
We find H.3471 problematic in the following ways:

Bill Notification Requirement:
The bill's notification requirement applies only to oil retailers, not to the insurance companies or agencies who actually sell, underwrite, and administer these policies. Thus, this approach limits the accountability of insurance companies and agents for notifying homeowners about this coverage. In Mr. Stark's June testimony, he emphasized that it is the shared responsibility of insurance companies, insurance agents, and oil companies to ensure that homeowners are informed about the availability of insurance for home heating oil spills. H.3471

falls short of that standard by placing the entire burden on oil retailers, rather than on those best positioned to educate policyholders at the point of insurance purchase or renewal.

Furthermore, since many customers price shop for home heating oil, oil companies often make one-time deliveries with no ongoing relationship to the homeowner. So, then, this approach is impractical.

First and Third-Party Coverages:
H.3471 separates first-party and third-party coverage, without adequately defining either, apparently while requiring homeowners to pay separately for each. The LSPA believes these coverages should apply simultaneously and in addition to each other, consistent with Massachusetts law (Chapter 175, Section 4D) and longstanding public policy affirmed in *Boston Gas Co. v. Century Indemnity Co.*, 708 F.3d 254, 265 (1st Cir. 2013). The "simultaneous" approach ensures that contaminated soil is covered as a third-party claim when oil trapped in soil may leach into groundwater or migrate off-site—conditions typical of home heating oil spills.

Under H.3471, homeowners would be expected to understand the intricacies of these coverages and proactively request both forms of protection—an unrealistic expectation given the complexity of the insurance market and the limited awareness of existing coverage options.

Conclusion
While homeowner education is important, experience has shown it is not sufficient. Moreover, bills like H.3471, or H.1194—which assign responsibility to just one party—create a piecemeal approach to a complex problem. Legislators are left to sift through multiple narrowly focused bills, each addressing a piece of the issue, instead of passing one clear, comprehensive solution. This is why we urge support of H.1302 and S.813: this legislation is a straightforward, systemic fix that ensures all homeowners are treated equitably and are automatically protected.

For these reasons, the LSPA respectfully urges the Committee to issue a negative report on H.3471 and instead focus attention on S.813 and H.1302. This approach is fairer, more consistent with established public policy, and far more effective in protecting both Massachusetts homeowners and the environment.

Enclosed with this letter, please find:

1. The LSPA's testimony on S.813/H.1302 presented before the Joint Committee on Financial Services on June 24, 2025; and
2. A follow-up letter submitted in opposition to the Massachusetts Insurance Federation's testimony from that same hearing.

Thank you for your attention to this matter and for your leadership in advancing protections for Massachusetts homeowners. The LSPA would welcome the opportunity to meet with you or your staff to discuss these issues further.

Sincerely,

Katie Kudzma, LSP
LSPA President

Mariellen Morris
Executive Director, LSP Association, Inc.

Encl.

Cc:
Representative Michael S. Day, 31st Middlesex (Bill Sponsor, H.3471)
Representative Jeffrey Roy, 10th Norfolk (Bill Sponsor, H.1302)
Senator Jacob Oliveira, Hampden, Hampshire, Worcester (Bill Sponsor, S.813)
Representative James Murphy, 4th Norfolk
Senator Paul Feeney, Bristol and Norfolk
Christopher Stark, Executive Director, Massachusetts Insurance Federation

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June 24, 2025

The Honorable Paul R. Feeney, Senate Chair
The Honorable James M. Murphy, House Chair
Joint Committee on Financial Services
Massachusetts State House
24 Beacon Street
Boston, MA 02133

Subject: H.1302 and S.813, An Act relative to the remediation of home heating oil releases

Dear Chair Feeney, Chair Murphy, and Members of the Joint Committee:

The LSP Association (LSPA) urges your committee's support of H.1302 and S.813, *An Act relative to the remediation of home heating oil releases.*

<u>The LSP Association (LSPA)</u>
The LSPA is the non-profit association for Licensed Site Professionals (LSPs) and related practitioners. LSPs are the scientists, engineers, and public health specialists licensed by the Commonwealth to work on behalf of property owners and other involved parties to oversee the assessment and cleanup of oil and hazardous materials released to the environment. These sites include multi-acre urban brownfields, roadside spills, "mom and pop" gas stations and dry cleaners, home heating oil spills, and everything in between.

The LSPA has approximately 800 members. Our members are consultants who work with institutional, non-profit, government, and private clients to remediate contaminated sites so these properties can be placed back into active and productive use. Together, with the Massachusetts Department of Environmental Protection ("MassDEP") and the Board of Registration of Hazardous Waste Site Cleanup Professionals ("LSP Board"), LSPs are the third "arm" of an innovative, privatized program created by the legislature in 1993. In adherence with the hazardous waste site cleanup regulations at 310 CMR 40.0000, also known as the Massachusetts Contingency Plan (MCP), LSPs have helped bring over 42,000 sites to a condition where they safely meet regulatory standards for business, commercial/retail, industrial, institutional, open space, or housing.

<u>The Problem</u>
When there is a spill or leak of residential heating oil, an LSP is eventually and inevitably involved. Our members feel powerless when working with distraught homeowners who find themselves without coverage—despite having homeowner's insurance—for what they soon realize is a complex, daunting, and very expensive cleanup. These situations motivated the LSPA to become one of the leading parties in a legislative effort, beginning more than 20 years ago, to try to find a way for homeowners using oil heat to be covered by insurance coverage should their system leak or cause a spill.

In 2010, the current law, G.L. c. 175, § 4D, went into effect, requiring insurers to "make available" so-called "liquid fuel" riders to homeowners seeking environmental cleanup coverage. The legislation was a compromise between the LSPA (and others working in collaboration with us) and the insurance industry, but it only required insurers to offer a fuel oil rider to those insureds who affirmatively requested it. The insurance industry insisted that this be tried as a first step, before ever considering mandatory coverage, to see if it would resolve the uninsured fuel oil problem. For those few homeowners who have requested and received coverage and then had a fuel oil spill, we are certain this law has been a lifeline. Unfortunately, though, the legislation did not go far enough.

More than 10 years later, most homeowners still do not have this liquid fuel rider. Many homeowners first learn about the availability of the rider only after reporting an oil spill to their homeowners' insurer and, much to their surprise and detriment, learn their claim has been rejected because they did not have this rider in the first place.

The Solution

In the years since, it has become abundantly clear that additional legislation is needed to close this loophole and ensure that all Massachusetts homeowners who heat with fuel oil have insurance in place to pay for the cleanup that is required by law in the event of a fuel oil release. The LSPA is promoting H.1302 and S.813 to correct the significant omission in the 2010 law–the lack of mandatory coverage–so the law can accomplish the objective for which it was designed.

Provided below are some important facts that cannot be ignored:

- Of the approximately 615,000 Massachusetts homes heated by oil[1], the vast majority are not covered by home heating oil remediation insurance; approximately 114,000 homeowners[2] (only 19% of all homes heated with oil) have specialized liquid fuel release coverage.
- Most of the homeowners who report heating oil spills annually (there were 75 reported incidents in 2023[3]) will be unaware this coverage exists and, at that point, it's too late to get coverage.
- Cleanup costs can range from $20,000 to $50,000 for simple releases to more than $500,000 to over $1 million for the most complex releases that impact both soil and groundwater. MassDEP has noted that, for a high percentage of these residential fuel oil releases, homeowners are unable to pay for cleanups.
- The stories of uninsured homeowners who face the daunting task of cleaning up a leaking system are heartbreaking. The hardships endured—the nest egg savings spent, the college funds diminished, the retirement delayed—these weigh on all involved. Some LSPs provide a portion of their services pro bono to homeowners, but that alone is not enough.
- Even though the current cost to homeowners for spill cleanup insurance is typically less than $100 per year, most homeowners are unaware it can be purchased. Notably, insurance companies do not actively promote it or explain its value.
- When homeowners do not have insurance coverage and cannot afford to clean up their property, contamination often remains in the environment where it can spread and impact neighboring properties, drinking water supplies, and protected ecological habitats.

Insurance coverage should be provided for homeowners who use fuel oil, just as coverage for fires or explosions in homes using electric or natural gas heating systems is provided. That coverage is included in most homeowner's policies as a standard and regardless of the energy source of the property's heating system. Therefore, risks attendant to heating oil should be treated no differently. If the cost of mandatory fuel oil cleanup coverage were spread-out over all Massachusetts homeowner's policies, similar to the way the risks of gas and electric heat are handled, the incremental additional cost to homeowners would be nominal.

Legislative History

Senator Anne Gobi originally introduced this legislation during the 2017-2018 legislative session as S. 534. That bill received a favorable report from the Joint Committee on Financial Services. Senator Gobi

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[1] https://www.mass.gov/info-details/how-massachusetts-households-heat-their-homes

[2] MassDEP November, 22, 2024, "Report to the Joint Committee on Environment, Natural Resources and Agriculture"

[3] MassDEP November 22, 2024, "Report to the Joint Committee on Environment, Natural Resources and Agriculture"

LSP Association

refiled the bill in the 2019-2020 (S. 594), 2021-2022 (S. 676) and 2023-2024 (S. 648) legislative sessions; with it again receiving favorable recommendations each time from the Joint Committee on Financial Services.

In the 2021-2022 session, the Senate amended the bill prior to engrossment to provide an exclusion from coverage if the oil release would not have occurred, but for the homeowner's failure to comply with the requirements of G.L. c. 148, § 38J (b) or (c) or any regulations promulgated pursuant to that statute. This exclusion, which would allow an insurer to deny a claim, was agreed to as a major concession by the LSPA to the insurance industry. Both bills currently before your committee include that amendment, as well as additional amendments sought by the Massachusetts Insurance Federation and adopted by the Senate Committee on Ways and Means in 2022.

We are appreciative that the Senate has passed the bill in the last two sessions. Each time it was subsequently referred to the House Committee on Ways and Means, where it stayed until the end of each of the past two sessions.

Conclusion

There have been many news media stories over the past few years highlighting the terrible costs, both financial and emotional, facing homeowners who find out, too late, they are uninsured. NBC10 Boston ran this story on September 22, 2021. After extensive television and print media coverage kicked off by this article, The *Boston Globe* published an editorial on February 26, 2022, in support of the bill. And, most recently, WBZ CBS Boston News ran this story. These and many other heartbreaking examples demonstrate the acute need for legislation to rectify the loophole that allows insurance companies to abandon homeowners at their greatest time of need.

The LSPA believes H.1302 and S.813 offer a simple, effective, and fair way to address the economic, public health, and environmental issues that arise from an accidental release of home heating oil.

The LSPA urges the Joint Committee on Financial Services to report out favorably on H.1302 and S.813.

Respectfully,
The LSP Association, Inc.

Mariellen Morris

Joe Roman, LSP
LSPA President

Mariellen Morris
LSPA Executive Director

LAW OFFICE OF SUSAN J. CRANE

June 23, 2025

Sen. Paul R. Feeney, Senate Chair
Rep. James M. Murphy, House Chair
Joint Committee on Financial Services
State House
Boston, MA 02133

Re: Please support S. 813 and H. 1302: *An Act relative to the remediation of home heating oil releases.*

Dear Chairman Feeney, Chairman Murphy, and Committee Members:

For thirty years, I have represented numerous homeowners in the pursuit of insurance coverage for the cleanup of home heating oil releases on their properties. Most homeowner's policies today, however, specifically exclude coverage for any type of "pollution" claim. After an oil release, this almost universally comes as a nasty surprise to insureds, leaving homeowners to foot the bill for costly residential fuel oil cleanups, averaging over $100,000. Over the years, I have had four clients whose home heating oil cleanups have cost over $1 million each.

Background

On average, about 100 oil releases from residential properties in Massachusetts are reported to the Massachusetts Department of Environmental Protection ("MassDEP") each year,[1] but it is believed that the actual number is considerably higher, as many go unreported. Under Massachusetts General Laws chapter 21E, owners of property from which there has been a fuel oil release are generally strictly liable (*i.e.*, without regard to fault) to pay for and undertake a cleanup of the oil on their own property and on any other impacted properties to which the oil has migrated.

Residential fuel oil releases take their toll on homeowners and the environment in myriad ways. Harmful vapors from oil released into the subsurface can readily impact indoor air. If oil migrates to the groundwater, it can make drinking water supply wells unusable unless costly filtration systems are installed. Sometimes homes must be moved off their foundations to accommodate the excavation of contaminated soil, requiring residents to relocate for extended periods of time. The financial impact on homeowners can be devastating. Public funding is rarely available to pay for the cleanups for this

[1] In 2023, the most recent calendar year for which MassDEP has released data, 75 heating oil releases at residential properties were reported to MassDEP. *MassDEP Report to the Joint Committee on Environment, Natural Resources and Agriculture, dated November 22, 2024.*

vulnerable segment of our population. Sometimes there is simply no funding available for cleanups, rendering residential properties significantly devalued and unsafe, and the environment impaired. The emotional toll on homeowners cannot be overstated, and many have required the assistance of professional mental health counselors.

2009 Legislation – An Attempted Fix

I have been working on a solution to home heating oil release funding for what has now become a two and a half decades-long *pro bono* effort. From 2000 - 2008, I was a member of a 21E Homeowner Funding Work Group comprised of environmental lawyers and consultants, insurance and oil company representatives, MassDEP representatives and others concerned about funding mechanisms for residential fuel oil cleanups in Massachusetts. That effort led to the enactment of M.G.L. c. 175, § 4D, which went into effect in 2010. It required homeowner's insurers to "make available" so-called "liquid fuel" riders to homeowners seeking environmental cleanup coverage, as long as certain preventative upgrades to their heating systems were made and certified, and subject to a relatively small additional premium.

In insurance parlance, making this coverage "available" is not the same as "offering" it to all homeowners; rather, it only requires insurers to offer a fuel oil rider to those insureds who *affirmatively* request it. The legislation was a compromise with the insurance industry, after it had effectively lobbied against a bill for legislation in three consecutive legislative sessions that would have mandated home heating oil release cleanup coverage.

Although some homeowners have benefitted from the law, and it appears that its preventative heating system upgrade requirements may have resulted in a reduced number of home heating oil releases, the law does not go far enough for a variety of reasons:

- It does not require insurers actively to "offer" the coverage for an additional premium or to "provide" the rider. Consequently, most homeowners are unaware of its availability and do not request it from their insurance carriers.

- Many homeowners who are offered the rider by those insurers actively marketing it opt not to invest in it, even though it would typically increase their annual premium by something less than $100, presumably either because they do not appreciate the risk or do not want to pay for system upgrades and/or additional premiums. As of the end of 2023, MassDEP reported that 114,025[2] Massachusetts homeowners have purchased riders out of approximately 615,000 households heated by oil (approximately 22% of all Massachusetts homes), [3] or about only 18%.

[2] *See* MassDEP 2024 report, cited in Fn. 1.
[3] https://www.mass.gov/info-details/how-massachusetts-households-heat-their-homesMassachusetts

- The legislation's minimum coverage is $50,000 first party (*i.e.*, property damage) and $200,000 third party (*i.e.*, groundwater or off-site cleanups/liability defense and indemnity),[4] which can be insufficient. Meanwhile, we are observing that the trend continues for homeowner's insurers to add pollution exclusions to standard policies.

- Since this insurance coverage is not widespread, some insurers do not understand their legal obligations under the rider and make coverage extremely difficult for homeowners who have procured this specialized coverage and then have fuel oil releases on their properties.

<u>S. 813 and H. 1302 – The Proposed Solution</u>

Senate Bill 813, sponsored by Sen. Jacob R. Oliveira, and very similar House Bill 1302, sponsored by Rep. Jeffrey N. Roy (collectively, the "Bills"), would address the loopholes in Section 4D of Chapter 175 that keep the availability of liquid fuel oil policies a well-kept secret, resulting in specialized liquid fuel oil riders for only a small percentage of Massachusetts's oil-heated homes. The Bills would mandate coverage for fuel oil releases from residential above-ground storage tanks systems, with increased minimum coverages of $75,000 (first party) and $250,000 (third party) to keep pace with escalating cleanup costs. The Bills make sense:

- They are simple, easy to implement, and cost-effective.

- The risks of home heating oil should be covered under every policy, just as they are for other types of heating systems. Explosions caused by natural gas heating systems and fires caused by electrical heating systems are generally covered, even in policies for homeowners who do not use those forms of energy. Fuel oil should be treated no differently.

- By spreading out the risk among approximately 2 million Massachusetts homeowner's policies, the incremental cost per policy for cleanup costs based on risks to the insurance industry has been estimated as *de minimus*.

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[4] Most homeowner's policies are comprised of two parts: Section I/first party property coverages; and Section II/third party liability coverages. Section I property coverages extend to damage to a homeowner's own property, such as any structures and personal property of the insured. Under a liquid fuel rider, on-site soil remediation falls under first party, since it is owed by the insured. Coverage under Section I includes restoration to landscaping and hardscaping, and building repairs after an intrusive cleanup. Section II provides liability coverage to the property owner. Under a liquid fuel rider, liability coverage extends to groundwater and off-site remediation. Legal costs associated with the fuel oil release to defend MassDEP's Notice of Responsibility issued to the homeowner and to defend any other third party claims asserted against the homeowner for property damage or bodily injury are also covered, as well as indemnity for payments made to claimants.

- All Massachusetts residents and our environment would benefit, not just homeowners using fuel oil. With insurance funding, groundwater contamination, which can readily spread across property lines if not abated quickly, would be promptly cleaned up, preventing contamination of water supplies and vapor intrusion into downgradient properties. Surface water bodies would be protected from the deleterious effects of oil on fish and other aquatic animals. Any natural ecosystem impacted by oil will suffer in the absence of a prompt and comprehensive cleanup of an oil release.

Homeowner testimonials

In conjunction with the pending bill, you will hear about the financially and emotionally devastating effects of uninsured oil releases on homeowners' residential properties. Some have temporarily had to relocate their families during a cleanup because of safety factors arising from structural issues during the remediation or potential exposure to dangerous levels of petroleum constituents. Some have had their and perhaps also their neighbors' private water supplies impacted, forcing them to find alternative drinking water sources or to install costly filtration systems. Others have drained their life savings, children's college funds, or retirement funds to pay for a cleanup. Still others have no means whatsoever to fund a cleanup; they have lost all of the equity in their homes, their primary or sole asset, and they must continue to live in houses on contaminated land.

One of my clients was an octogenarian widow who passed away about five years ago and whose oil release occurred in the late 1990s. Due to funding issues for a cleanup costing well over $1 million, her property took two decades to clean up and close. As a result of her property's significantly diminished value prior to site closure, she could not sell her house and use its equity to move into suitable elderly housing. This dramatically impacted her options late in life and the lives of her adult children, who assisted her through the arduous cleanup process. Sadly, she passed away before ever seeing the site closed. Similarly, a few years ago, another client in his late 80s, Nicholas Stephens of Hopkinton, testified before this Committee on a predecessor bill to the Bills. After spending over $500,000 on the cleanup, he too passed away just before his site was closed with MassDEP.

The Bills offer a fair and well-crafted solution to resolve a significant financial, environmental, and public health and safety issue at residential fuel oil sites. If you have any questions, please do not hesitate to contact me.

Very truly yours,

Susan Crane

Susan J. Crane

Wave 2 Environmental, Inc.

June 23, 2025

The Honorable Paul R. Feeney, Senate Chair
The Honorable James M. Murphy, House Chair
Joint Committee on Financial Services
State House
24 Beacon Street
Boston, MA 02133

Subject: H.1302 and S.813, An Act relative to the remediation of home heating oil releases

Dear Chair Feeney, Chair Murphy, and Members of the Joint Committee:

I am a self-employed Licensed Site Professional that has been working in the Commonwealth as an environmental engineer and consultant for over 30 years. During this time I have consulted for affected homeowners and have experienced firsthand the stark realities of these difficult situations. I have been involved with numerous uninsured home heating oil spills since passage of the 2010 legislation. Each spill is unique in both complexity and financial impact, but all of them result in overwhelmed and frustrated homeowners who feel ill-served by the current system. The cost of the cleanup may bankrupt some families, and most lenders will not loan against a property with an active oil release. As you can imagine, being the LSP for an uninsured homeowner can be emotionally challenging and oftentimes results in pro-bono services or reduced fees in an attempt to offset a portion of the substantial cleanup costs. Unfortunately this attempt of compassion often goes unnoticed because the real costs of environmental cleanup are so overwhelming and oftentimes insurmountable. Considering the risk of non-payment and the liability of third party damage caused by delay, many environmental firms in the Commonwealth refuse **all** uninsured homeowner spill work outright, leaving the homeowner and regulating entities in some difficult and impossible situations.

The following are the stories of seven Massachusetts homeowners who have experienced an oil release at their primary residences and have agreed to allow me to share their stories with you. Photographs taken of several homeowner oil releases I have worked on are also included as an attachment to this letter:

- The family of Rita Mendes of New Bedford discovered an oil release during the sale of their mother's vacant home. The family was selling the home to pay their mother's nursing home costs and was told by their insurance carrier that they had no coverage for the clean-up of the release. The Mendes family paid $45,000 to complete the cleanup, approximately 25 percent of the property value, and delaying the sale of the property.

11 Broadcommon Road, Unit 321
Bristol, RI 02809
(508) 863-3102

- Richard Dow and Margaret Flanigan of South Dartmouth had a release of an estimated 80 gallons of fuel oil. The retired couple recently purchased the home and had unknowingly paid for the liquid fuel carrier on their homeowner policy (despite not being aware of it or requesting it). Based on the lack of apparent third party impact resulting from the release, the policy caps the clean-up coverage at $50,000 and the homeowners paid approximately $20k above that out of pocket.

- John and Susan Adams discovered an oil release on property in South Dartmouth they had recently purchased and were in the process of redeveloping. The Adams did not have coverage but were spared significant clean-up costs because the original home had been razed as part of the redevelopment project, making the contamination easily accessible with heavy equipment. Regardless of that factor, they still paid approximately $20,000 to clean-up the release.

- Claire Gaumont had a release of an estimated 200 gallons of oil in the basement of her home in Rochester. Ms. Gaumont is a 92-year-old widow living in the home alone and does not have insurance coverage for the clean-up. Due to the overall extent of contamination and logistical challenges with safely removing the contamination from beneath the field stone foundation of the home, moving the house off of the foundation to allow full access to the contamination proved to be the most cost effective and timely approach to cleaning up the spill. The release also had the potential to impact a private water supply well located on the property and Ms. Gaumont was forced to leave her home during the cleanup. This project cost more than $150,000 of Ms. Gaumont's money to complete.

- Lisa McClintock had a release of approximately 210 gallons of oil in the basement of her home in Swansea. Ms. McClintock is a teacher and a recently widowed, single mother of four children of high school/college age who does not have insurance coverage for the clean-up. Her family (parents and in-laws) was able to pay for roughly $15,000 of emergency response and assessment costs (which included an additional $5,000 of pro-bono/discounted services) but the clean-up was going to cost significantly more. With assistance from State Representative Howitt, Ms. McClintock is currently enrolled in a pilot program with the MassDEP, that will allow her to repay the Commonwealth for clean-up activities completed by MassDEP's spill response contractors over time.

As you can see, the problem of uninsured homeowners is very real and indiscriminate, affecting individuals of all ages, income levels and situations. The referenced properties range in value from $150,000 to over $1M and involved multiple insurance providers. Almost all of affected homeowners were unaware of the "liquid fuel" rider option (including those who had it), and every one of them **thought they had coverage**. All would have gladly paid $100 a year to have that protection. Although the focus in these testimonies is often on the failures of the system, it is my opinion that it is just as important to point out the benefits of when the system works. The differences for affected homeowners are palpable. The environmental regulations in Massachusetts are difficult to navigate and can overwhelm homeowners. Insurance companies that provide coverage for home heating oil spills are well versed in the process and typically contract with third party consultants who provide guidance to the homeowners and technical review of the efficacy of work being performed to control costs. With insurance oversight, homeowners do not feel left alone, uninformed, or taken advantage of. The ability of an insured homeowner to pay for a clean-up often leads to expedient remedial actions which limits migration of the spilled oil and potential damage to neighboring properties or natural resources of the Commonwealth.

It is the opinion of the undersigned staff of Wave 2 Environmental, Inc. as members of the LSPA, that **H.1302 and S.813** are the best available solutions for this problem. The LSPA-authored legislation enhances the current law by enhancing coverage to homeowners and raises coverage limits to keep pace with rising remediation costs. We strongly urge the Committee to report out in favor of **H.1302 and S.813**.

Sincerely,
For Wave 2 Environmental, Inc.

Kevin Beaulieu, LSP
President

Attachments:

- Homeowner Oil Spill Photographs

Photographic Record

Project Name: Clarks Cove Road, Dartmouth - IRA

Address: 2 Clarks Cove Road - Dartmouth, MA

Date: March 5, 2017 | **Photographer: Kevin Beaulieu**

Comments:

View of leaking 330-gallon AST gauge after stopping the leak.

Comments:

View of impacted sump and absorbent pads.

Photographic Record

Project Name: Clarks Cove Road, Dartmouth - IRA	
Address: 2 Clarks Cove Road - Dartmouth, MA	
Date: March 6, 2017	**Photographer: Kevin Beaulieu**
Comments: View of oily absorbent pads in sump.	
Comments: View of oily absorbent pads in sump.	

Photographic Record

Project Name: Clarks Cove Road, Dartmouth - IRA

Address: 2 Clarks Cove Road - Dartmouth, MA

Date: April 11-24, 2017	**Photographer: Kevin Beaulieu**






Comments: View of IRA soil excavation activities.

Photographic Record

Project Name: Clarks Cove Road, Dartmouth - IRA

Address: 2 Clarks Cove Road - Dartmouth, MA

Date: May 3, 2017 | **Photographer: Kevin Beaulieu**






Comments: View of Site restoration activities. Note standing water in drainage layer.

Photographic Record	
Project Name: New Bedford Road, Rochester - IRA	
Address: 45 New Bedford Road - Rochester, MA	
Date: November 28, 2017	**Photographer: Kevin Beaulieu**
Comments: View of IRA excavation activities.	
Comments: View of IRA excavation activities.	

Photographic Record

Project Name: New Bedford Road, Rochester - IRA

Address: 45 New Bedford Road - Rochester, MA

Date: November 28, 2017 | **Photographer: Kevin Beaulieu**

Comments:

View of IRA excavation activities.

Comments:

View of IRA excavation activities.

Photographic Record

Project Name: New Bedford Road, Rochester - IRA	
Address: 45 New Bedford Road - Rochester, MA	
Date: November 28, 2017	**Photographer: Kevin Beaulieu**
Comments: View of IRA excavation activities.	
Comments: View of IRA excavation activities.	

Photographic Record	
Project Name: New Bedford Road, Rochester - IRA	
Address: 45 New Bedford Road - Rochester, MA	
Date: November 28, 2017	**Photographer: Kevin Beaulieu**
Comments: View of IRA excavation activities.	
Comments: View of IRA excavation activities.	

Photographic Record

Project Name: New Bedford Road, Rochester - IRA

Address: 45 New Bedford Road - Rochester, MA

Date: November 28, 2017	**Photographer: Kevin Beaulieu**






Comments: View of IRA soil excavation activities.

Photographic Record

Project Name: Armour Street, New Bedford - IRA

Address: 101 Armour Street – New Bedford, MA

Date: November 18, 2019	**Photographer: Kevin Beaulieu**





Comments: View of pre- IRA Site conditions.

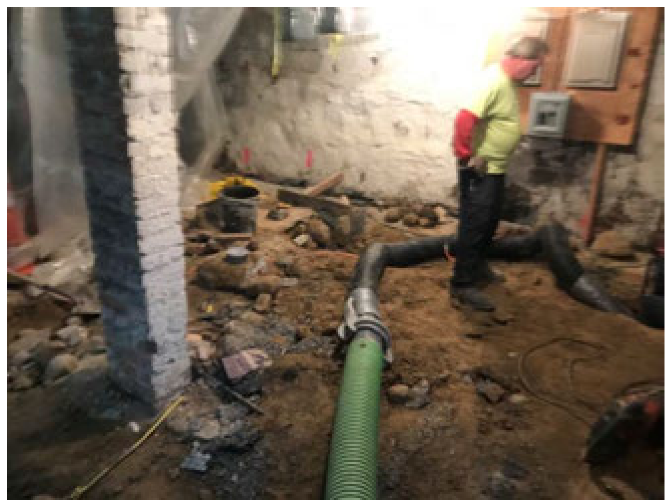
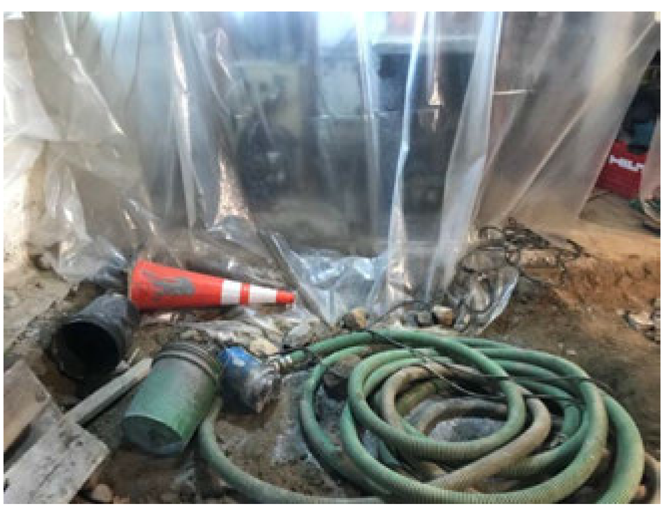
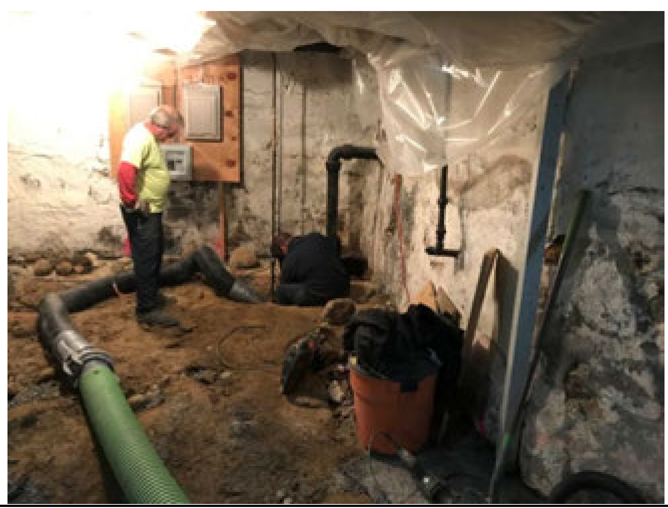
Photographic Record

Project Name: Armour Street, New Bedford - IRA

Address: 101 Armour Street – New Bedford, MA

Date: January 3, 2020	**Photographer: Kevin Beaulieu**



Comments: View of IRA activities.

Photographic Record

Project Name: Armour Street, New Bedford - IRA	
Address: 101 Armour Street – New Bedford, MA	
Date: January 14, 2020	**Photographer: Kevin Beaulieu**

Comments: View of post-IRA Site conditions.

Photographic Record

Project Name: Sherwood Circle, E Bridgewater - IRA

Address: 138 Sherwood Circle - E Bridgewater, MA

Comments:

View of S1 soil sample floor drain excavation area prior to installation of vapor extraction system piping.

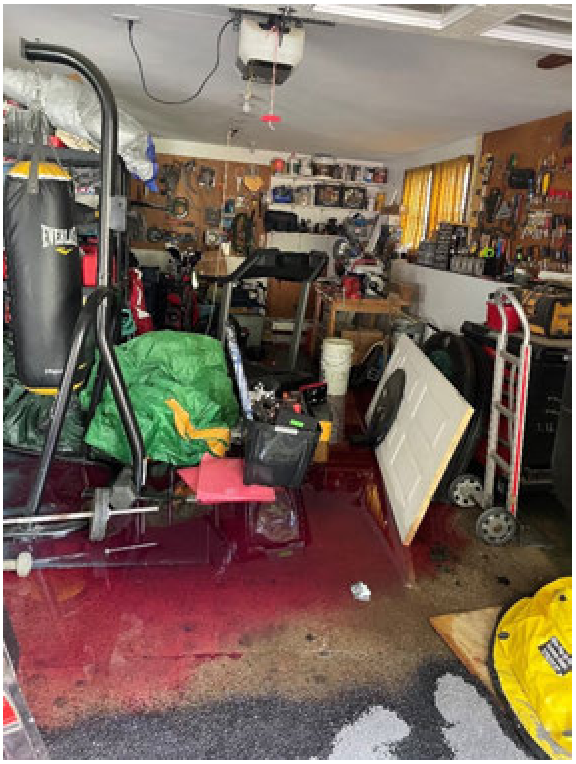
Comments:

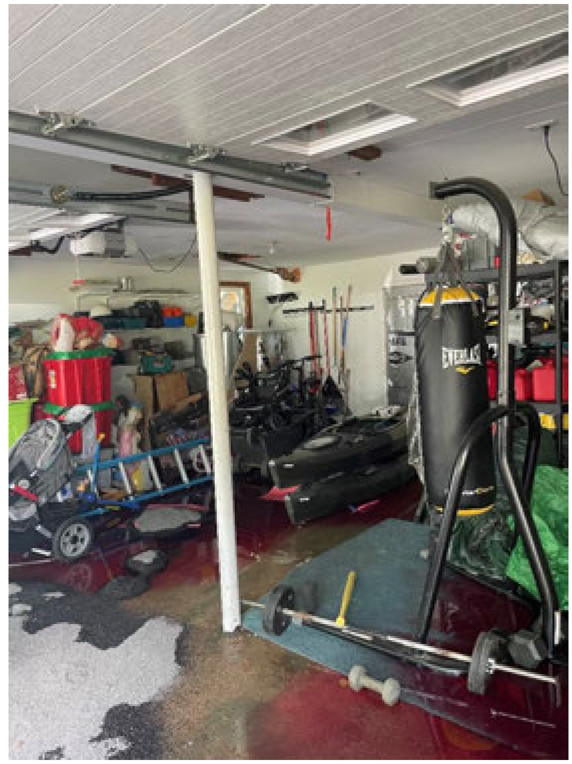
View of S2 soil sample floor drain excavation area prior to installation of vapor extraction system piping.

Photographic Record

Project Name: Sherwood Circle, E Bridgewater - IRA

Address: 138 Sherwood Circle - E Bridgewater, MA





Comments: Views of oil flooded garage floor on the day of the incident.

Photographic Record	
Project Name: Fifteenth Avenue, Wareham - IRA	
Address: 7 Fifteenth Avenue - Wareham, MA	
Date: January 7, 2022	**Photographer: Brian Proctor**
Comments: View of AST location and pooled oil beneath.	
Comments: View of pooled oil and absorbent containment berms.	

Photographic Record

Project Name: Fifteenth Avenue, Wareham - IRA

Address: 7 Fifteenth Avenue - Wareham, MA

Date: May 16, 2022	**Photographer: Kevin Beaulieu**

Comments: Views of IRA excavation activities

Kathleen S. Murray
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MAssiveOilProblemsMA@gmail.com

June 20,2025

Sen. Paul R. Feeney, Senate Chair
Rep. James M. Murphy, House Chair
Joint Committee on Financial Services

Good afternoon, Chairman Feeney, Chairman Murphy, members of the committee,

My name is Kathleen Murray. I'm not a policy expert. I'm not a lobbyist. I'm not part of any powerful interest group. I am a homeowner and I'm here because my family went through something devastating—something that could happen to many of your constituents—and we had absolutely no protection.

On February 8th of this year, our heating oil tank leaked. Not a drip. Not a minor fix. A full-scale disaster. 190 gallons of oil seeped into the ground beneath our home, into our French drains, and into our sump pump. Thankfully, first responders and DEP officials quickly contained it.

But let me be clear: while the environment was spared, our lives were shattered.

That day set off a chain of events no family would be prepared for. We found out we were entirely responsible for the cleanup. No insurance coverage. No state safety net. No one to turn to. We were forced to hire an LSP, environmental experts and contractors. The estimated cost to fix it all? **$400,000.**

That's not an exaggeration, and it's not a number that should fall on a middle-class family simply for heating their home.

We were four years away from paying off our mortgage. Instead, **we've already taken on $90,000 in debt**—at 57 and 66 years old with 3 kids in college. We now live in fear: of the next invoice, the next contractor, the next thing we might have to give up. And when you live through something like this, financial ruin is no longer just a concept. You *feel* it—every day.

Here's where it gets worse.

There's an insurance rider that would've covered this. It exists. But we were **never** told about it. Not by our homeowner's insurance company MetLife when the law passed for the rider in 2011, not by Farmers Insurance when they bought MetLife in 2021. Not once did our insurer mention it. Not in a renewal notice. Not in a phone call. Nothing.

And when we asked if we were covered? We were told, flatly: **"No."**

Let’s be honest: this is exactly the kind of thing people hate about the insurance industry. The coverage is available—but only if you ask the exact right question about a hazard and a rider you don’t even know exists. There’s no disclosure requirement. No duty to warn the homeowner. It’s not protection. It’s a trap.

And if we had known about that rider? We absolutely would have paid for it.

That’s why I’ve been sharing our story—on social media, with the press, with total strangers. Because I refuse to stay silent while this can still happen to someone else. **90% of people with oil heat that I speak with are unaware** of the risk of an aging tank or the rider.

And that’s why I’m here today.

I’m asking you to support – imploring you – to support H.1302 and S.813 — two bills that would make oil spill coverage *mandatory* in homeowners’ insurance. No hidden riders. No vague exclusions. No more families falling through the cracks.

Massachusetts has long been a leader in climate and environmental protections, and that’s something to be proud of. But there needs to be balance, we can’t call ourselves a leader if the cost of protecting that environment is destroying families.

This is about justice. It’s about transparency. It’s about ensuring that homeowners aren’t financially ruined by a disaster they were never even warned about.

You have the power to change that. Please don’t wait for another family to lose everything.

Kind regards,

Kathleen S. Murray

LSP Association
assess. advise. restore.

405 Concord Avenue #352, Belmont, MA 02478 | 617-977-4304 | info@lspa.org | www.lspa.org

Via email attachment

July 7, 2025

Sen. Paul R. Feeney, Senate Chair
Rep. James M. Murphy, House Chair
Joint Committee on Financial Services
State House
Boston, MA 02133

Re: LSPA Response to June 24, 2025, Massachusetts Insurance Federation Testimony in Opposition to S. 813 and H. 1302: ***An Act relative to the remediation of home heating oil releases***

Dear Chairman Feeney, Chairman Murphy, and Committee Members:

Thank you for the opportunity to testify before your Committee on June 24, 2025, in support of the two above-reference bills, both titled, *An Act relative to the remediation of home heating oil releases* (the "Bills"). We very much appreciated your Committee's attentive listening, thoughtful comments and questions, and sensitivity to the extremely difficult situations homeowners face after an uninsured fuel oil spill on their properties.

The homeowners insurance industry has been the sole and steadfast opposition to the Bills and their predecessor bills, first filed in 2019 by Sen. Anne Gobi. For the past three consecutive legislative sessions, new homeowners have come before you to share their heart-breaking stories. One after another, they have described, in gut-wrenching detail, how, despite responsibly procuring and maintaining their homeowners insurance, they were blindsided to discover, only after a disaster, that esoteric "pollution exclusions," embedded in dozens of pages of legal policy forms and endorsements, preclude coverage for home heating oil spills. These situations inevitably turn lives upside down. This year, you heard from Kathleen and John Murray from North Attleborough, Massachusetts, whose uninsured estimated cleanup costs are $400,000. We are grateful to the Murrays and all the homeowners who have bravely testified in the hope of preventing others from having the same devastating experience.

Due to leak prevention improvements on residential fuel oil heating systems mandated by 2009 legislation (M.G.L. c. 175, sec. 4D) that the LSP Association (LSPA) strongly supported, the number of annual home heating oil releases reported in Massachusetts continues to fall. Nevertheless, during each legislative session, the Massachusetts Insurance Federation (MIF) continues to testify in opposition to these bills, while simultaneously seeking changes to further reduce coverage for homeowners should the bills be passed.

The LSPA has prepared this response to clarify certain points made by Chris Stark, Executive Director, MIF, in his oral testimony in opposition to the Bills on June 24, 2025.

LSP Association

Scale of the Problem: Number of Fuel Oil Releases and Percentage of Homeowners with Liquid Fuel Riders

As you heard from testifying LSPA members, approximately 100 home heating oil spills are reported to MassDEP annually. In 2023, the most recent calendar year for which MassDEP released data, 75 heating oil releases at residential properties were reported. *See MassDEP Report to the Joint Committee on Environment, Natural Resources and Agriculture*, dated November 22, 2024 ("2024 MassDEP Report"), https://malegislature.gov/Bills/193/HD5518.pdf.

Contrary to Mr. Stark's statement that approximately one-third of Massachusetts homeowners who heat with fuel oil have procured liquid fuel riders to provide cleanup cost coverage in the event of a home heating oil release, the actual figure is **only approximately 19%**. According to the 2024 MassDEP Report, Table 1, 114,025 Massachusetts homeowners purchased riders in 2023, and out of approximately 615,000 households heated by oil (i.e., approximately 22% of all Massachusetts homes use oil heat; *see* https://www.mass.gov/info-details/how-massachusetts-households-heat-their-homesMassachusetts).

Material Differences Between S. 813 and H. 1302

In 2023, at the urging of MIF, several material changes were made to the predecessor bill to S. 813 (S. 648, Sen. A. Gobi), most of which the LSPA agreed to as a compromise with the insurance industry; however, one remains problematic. These revisions carried over to S. 813, but were never incorporated into H. 1302. The differences between the Bills, which must be reconciled prior to passage, are described below.

Objectional change made to S. 813 (but not to H. 1302) that would reduce coverage for soil remediation

When a fuel oil spill occurs, on-site soil is almost always impacted. This typically involves costly remediation, especially if the foundation requires support for the excavation of impacted sub-slab soils.

Both Bills state that "response costs incurred" to address "soil" "on the insured's residential property" are covered under first party. S. 813, sec. 4D(b)(1), and H. 1302, sec. 4D (b)(2). That is consistent with the mandate of M.G. L. c. 175, sec. 4D.
Additionally, if off-site soil is impacted, under both Bills and in accordance with M.G.L. c. 175, sec. 4D, that soil remediation would be covered under third party. S. 813, sec. 4D(b)(1), and H. 1302, sec. 4D (b)(2).

The soil remediation coverage challenge occurs under the following factual scenario, which requires a technical evaluation of site-specific subsurface conditions to determine the extent to which on-site soil remediation may also be covered under third party:

1) Due to policy limits or other policy exclusions, there is insufficient first party coverage to undertake or complete necessary on-site soil remediation; and

2) Residual oil-impacted soils on the insured's property present an actual or potential threat of ongoing contamination from the migration of oil bound to those soils to groundwater and/or off-site properties.

This was explicitly addressed in M.G.L. c. 175, sec. 4D(b)(2), which states (*emphasis added*):

> Third party liability coverage . . . shall include response action costs incurred to address conditions **on** and off **the insured's property** arising from a heating oil release on the insured's property that **has impacted or is likely to impact groundwater or has migrated to, or is likely to migrate to, a third party's property.** First and third party liability coverage shall apply **simultaneously and, in addition to, one another** when both coverages are applicable.

The clear legislative intent of this provision is that when on-site soils have impacted/migrated to or are likely to impact/migrate to groundwater or off-site properties, third party coverage simultaneously extends to necessary on-site soil remediation costs to mitigate third party impacts/threats, even if first party coverage is also paying for some portion of on-site soil cleanup costs. H. 1302, Sec. 4D (b)(2)(ii), includes identical language, consistent with the legislative mandate. MIF opposes this in H. 1302.

Over the expressed objection of the LSPA,[1] S. 813, sec. 4D(b)(3), departs from M.G.L. chapter 175, section 4D, and from H. 1302 by stating (*emphasis added*):

> First-party property coverage and third-party liability coverage shall apply ***concurrently*** when both coverages are applicable.

On June 6, 2025, a virtual meeting was held among LSPA and MIF representatives. In that meeting and in a detailed follow-up email to MIF, LSPA expressed their concern that the deviant "concurrent" language of S. 813 could result in much more restrictive coverage than under the current liquid fuel riders being provided in accordance with M.G.L. c. 175, sec. 4D. That was confirmed by MIF representatives, who voiced their objection to the "stacking" of first and third party provisions of a homeowners policy to provide for simultaneous coverage of on-site soil remediation costs under the triggering circumstances described above. LSPA pointed out that the potential stacking of first and third party was precisely what the legislature intended when it enacted the 2009 legislation.

[1] This objection was stated in a letter from the LSPA to MIF, dated April 12, 2024, copied to Senator Michael Rodrigues, Chair, Ways and Means.

Consequently, we strongly urge the Senate to amend S. 813 to revise the first sentence in sec. 4D(b)(3), Lines 35-36, to match that of H. 1302 and prior original[2] versions of the Senate bill, by replacing it with (*emphasis added*):

> First-party property coverage and third-party liability coverage shall apply **simultaneously and in addition to each other** when both coverages are applicable.

Other undisputed material differences between the Bills

Other material differences to the Bills are as follows:

- S. 813, Lines 6-9, Definition of "environmental media" added. This does not appear in H. 1302. This is acceptable to the LSPA.

- Language changed in S. 813 to address the standard for third party coverage, making the standard potentially somewhat more stringent. *Note:* this was a compromise of the LSPA, which preferred and continues to prefer the language in the House bill:

  > H. 1302 Lines 26-29 (*emphasis added*): Third party coverage shall include "response action costs incurred to address conditions on and off the insured's residential property arising from a heating oil release on the insured's residential property that has impacted, **or is likely to impact,** groundwater or has migrated to, **or is likely to migrate to**, a third-party's property.
  >
  > to:
  >
  > S. 813, Lines 22-25 (*emphasis added*): Third party coverage shall include "response action costs incurred to address conditions on and off the insured's residential property arising from a heating oil release on the insured's residential property that has impacted or **presents an imminent threat to impact** groundwater or has migrated to, or **presents an imminent threat to migrate to***,* a third-party's property.

- Section 2 of the Bills: H. 1302 (Lines 45-46) provides for an effective date of January 1, 2024, whereas S. 813 (Line 50) provides for an effective date of July 1, 2025. MIF proposes extending the date to July 1, 2026. The LSPA has no objection.

Other Issues Raised by MIF

Additional measures to prevent home heating oil releases

During the hearing on June 24, 2025, there was a discussion between Mr. Stark of MIF and Committee members about adding new provisions to the Bills to prevent home heating oil releases from occurring. This should be put into context by reference to the 2009 legislation. Both Section 4D of Chapter 175 and Section 38J of Chapter 148 required that the State's fire code be changed to

[2] This change was apparently made at some point late in the last legislative session, without the LSPA's knowledge or approval, after S. 648 was originally filed in 2023 with the language the LSPA is now seeking (*i.e.*, that the two policy provisions apply "**simultaneously and, in addition to, one another"**).

require that all residential home heating oil systems have oil safety valves or code-compliant fuel supply lines. It was no coincidence that prior to that legislation, approximately 500 home heating oil releases were reported to MassDEP annually, compared to the 75 spills reported based on statistics offered earlier in this letter.[3]

Any additional preventative measures must take into consideration the following three concerns: 1) unless required by the fire code, homeowners are unlikely to be aware of them since their heating system maintenance providers are unlikely to recommend them; 2) costs must be affordable to most homeowners; and 3) the measures must be practical.

MIF made two suggestions during the June 24, 2025, hearing, neither of which meets these three criteria:

1. The replacement of single-walled above-ground storage tanks with double-walled tanks: Although we are in complete agreement that double-walled tanks are much safer than the single-walled steel tanks used for fuel oil storage in most homes, they are not required by code *and* they are very costly to install. The replacement and retrofitting of piping for a new double-walled tank is out of reach financially for most homeowners, at an estimated cost of $2,000 or more.

2. Mandated regular inspections of all above-ground tanks: As described by Kathleen Murray, her oil tank leaked due to commonly occurring water buildup on the inside of the tank and resulting corrosion from the inside out. Her experience reflects how most tanks fail–a small, corroded area that cannot be observed from the outside creates a tiny hole over time, often under pressure shortly after being filled, and springs a sudden leak. A tank inspection is an unlikely predictor of when most corrosion holes will occur. Moreover, a mandatory tank inspection program would be complicated to implement and would have to involve trained professionals, as those employed by oil companies may not be trained to do this type of inspection. It would be hampered by the logistics of setting it up, including the details of the scope and timing of the inspection; enforcement mechanisms; and concerns about legal challenges to the "inspectors" if a leak were to occur. [4]

Consequently, the LSPA cannot support these proposed measures.

Coverage for property owned by the insured

MIF has proposed the Bills be amended to limit first party costs to remediate a heating oil release to those necessary to address the "insured's own property" instead of conditions "on the insured's residential property." Despite requests to MIF to explain this proposal, we have never received a cogent response.

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[3] Both Bills enable insurers to deny coverage if the oil release would not have occurred, but for the homeowner's failure to comply with the oil spill prevention regulations required by c. 148, sec. 38J(b). S. 813, sec. 4D(b)(3)(c) and H. 1302, sec. 4D(b)(3)(c).

[4] The fuel oil supply industry has expressed its opposition to inspections.

The LSPA does not support this change, especially without understanding MIF's intentions behind this proposal, which we infer is to reduce coverage. The purpose of the Bills is to provide coverage for damage that occurs *on the residential property*, not limited to property specifically owned by the insured. Moreover, the Bills' existing first party language providing coverage for damaged or destroyed property "on the insured's residential property" is consistent with that in standard homeowner's policies and M.G.L. c. 175, sec. 4D.

Cost containment

As described in testimony given LSPA members at the June 24, 2025, hearing, LSP consulting fees are a fraction of the total cleanup costs. Other reasonable and necessary costs can include: soil boring and groundwater monitoring well installations; laboratory services; contractors' soil excavation and disposal; contractors' remediation and disposal of other contaminated media, such as groundwater; indoor air testing; foundation support, often with pier installations, for soil excavation below a basement; etc.

When insurers cover cleanup costs, they almost universally retain their own environmental consultants to review and comment on remedial proposals in advance of their implementation and to pre-approve costs. The LSPA's experience, by and large, has been that collaboration between the LSP of record who is managing the site cleanup and the insurer's consulting environmental professional is beneficial to all parties. It not only assures the appropriateness of response action costs, but it also provides for well-managed and carefully evaluated response actions at a site.

MIF's Support of Similar Pending Bills: The Opt-in or Education Approach

Mr. Stark of MIF expressed support of two other pending bills pertaining to home heating oil spill coverage: H. 1194 (Rep. S. Howitt), which requires that coverage for home heating oil spills be provided in all homeowners policies unless an insured elects to opt out to reduce premium costs; and H. 3471 (Rep. M. Day), which would require that all home heating oil retailers provide annual notices to their customers, advising them of the availability of liquid fuel release coverage per M.G.L. c. 175, sec. 4D.

While we understand the intent of H. 1194, we have significant concerns about relying on an opt-out approach. In practice, too many homeowners—seeking to save a modest amount on premiums—would likely decline the coverage without fully understanding the risks they are taking on. The financial and environmental consequences of a home heating oil spill are severe, and homeowners who opt out could find themselves facing catastrophic cleanup costs with no insurance to assist them.

By contrast, Bills S. 813 and H. 1302 offer the simplicity and certainty of automatic, universal coverage,[5] as is the case with other types of home heating methods (e.g., gas and electric). This approach ensures that all homeowners who rely on home heating oil are protected, eliminating confusion and gaps in coverage. It is a stronger, more equitable solution that better serves the public interest and avoids the unintended consequences of an opt-out system.

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[5] Note that the Bills contain certain carve-outs to protect insurers. For example, under the Bills, underground storage tanks are excluded, and tank systems that are not up to code do not have to be covered. See Fn. 3.

Likewise, H. 3471 would do little to address the widespread problem of uninsured home heating oil spills. Despite a 15-year effort to educate consumers on both the risks of catastrophic fuel oil releases and the availability of relatively inexpensive (i.e., under $100/year) liquid fuel riders to cover this risk following the enactment of M.G.L. c. 175, sec. 4D, which made these riders “available” only to those who affirmatively request it, the education effort has largely failed. As Mr. Stark noted in his recent testimony, even when the Massachusetts FAIR Plan disseminated information to its customers about the rider’s availability, few homeowners opted in. Although it is true that immediately after heartbreaking stories of certain sensational home heating oil spills captured media attention in the past few years, there was a notable uptick in consumer interest in riders, the data speak for themselves. The fact that only 19% of Massachusetts homeowners who need this coverage currently have these riders in place underscores the ineffectiveness of education alone as a potential solution. Finally, this approach would require educating and training insurance agents to notify customers about this option and would require some type of enforcement mechanism.

We appreciate your taking these points into consideration as the Committee evaluates the Bills, and we urge the Committee’s support of the Bills and the Senate’s amendment to S. 813 as discussed in detail in this letter.

Please do not hesitate to reach out to the LSPA or any of its members who appeared before you in support of the Bills if you have any questions. We welcome continued dialogue.

Sincerely,
The LSP Association
Katie Kudzma, President
Mariellen Morris, Executive Director

Cc: Sen. Jacob R. Oliveira
Rep. Jeffrey N. Roy
Rep. Michael S. Day
Rep. Steven S. Howitt
Christopher Stark, MIF