



The Commonwealth of Massachusetts
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Charles D. Baker
GOVERNOR

Karyn E. Polito
LIEUTENANT GOVERNOR

Matthew A. Beaton
SECRETARY

Tel: (617) 626-1000
Fax: (617) 626-1081
<http://www.mass.gov/eea>

July 17, 2015

CERTIFICATE OF THE SECRETARY OF ENERGY AND ENVIRONMENTAL AFFAIRS
ON THE
EXPANDED ENVIRONMENTAL NOTIFICATION FORM

PROJECT NAME : Crystal Lake and Elginwood Pond Dredging Project
PROJECT MUNICIPALITY : Peabody
PROJECT WATERSHED : Ipswich River
EEA NUMBER : 15366
PROJECT PROPONENT : City of Peabody
DATE NOTICED IN MONITOR : May 6, 2015

Pursuant to the Massachusetts Environmental Policy Act (G. L. c. 30, ss. 61-62I) and Section 11.06 of the MEPA regulations (301 CMR 11.00), I hereby determine that this project *requires* an Environmental Impact Report (EIR). The Proponent submitted an Expanded Environmental Notification Form (EENF) with a request that I allow a Single EIR (SEIR) to be prepared in lieu of a Draft and Final EIR. Pursuant to 301 CMR 11.06(8), the Proponent may submit an SEIR in accordance with the Scope below.

Project Description

As described in the EENF and supplemental information submitted on July 7, 2015, the project consists of dredging an area of approximately 7.8 acres in Crystal Lake and five acres in Elginwood Pond. The dredging will increase the maximum depth of the water bodies from approximately 4.5 feet to eight feet, creating a deeper basin with shallow slopes of 6:1 along the perimeter to meet the banks. The goals of the project are to improve the water quality, aquatic habitat value, and recreational opportunities of the water bodies by increasing the water depth, removing sediments that serve as a nutrient source, and clearing the dense benthic aquatic vegetation that currently grows in the ponds.

The project will occur in two phases. Phase 1 will dredge approximately 51,500 cubic yards (cy) of sediment from Crystal Lake and the easternmost portion of Elginwood Pond, and construct park amenities in an area adjacent to Crystal Lake that will be used for staging during construction. The park amenities will include a fishing pier, a floating dock for launching canoes

and kayaks, a picnic area, and a parking area. Phase 1 of the project will also include the construction of a gazebo on the western shore of Crystal Lake adjacent to the Independence Greenway rail trail and an accessible trail leading to an overlook of the lake along its wooded southern shore. In Phase 2, approximately 31,000 cy of sediment from Elginwood Pond will be dredged. All dredged material will be disposed of at the City of Peabody's Municipal Landfill. As described in more detail below, the ponds will be dewatered and the input flows diverted so that the dredging may occur with mechanical equipment working in essentially dry conditions within the ponds.

Phase 1 will begin in the fall of 2015 and be completed in the spring of 2016. The commencement of Phase 2 of the project is dependent on funding and has not been scheduled.

Project Site

Crystal Lake and Elginwood Pond are located on a group of parcels owned by the City of Peabody totaling approximately 28 acres. The water bodies are bounded to the west by Lake Street, to the north by Lowell Street, and to the east by Taylor Street. Additional City-owned land, including a forest, playing fields, and a school and office building, are located to the south, between the project site and Pine Street.

Crystal Lake has a surface area of approximately 9.5 acres and averages 2.7 feet in depth, with a maximum depth of 4.5 feet. The primary source of inflow into the lake is from a wetland area located across Lowell Street to the north. The lake also receives stormwater discharges and groundwater inflow. Elginwood Pond is located to the west of Crystal Lake and receives flow from the lake through a culvert under a former railroad right-of-way now containing a roadway (Crystal Drive) and the Independence Greenway, a multi-use path. Elginwood Pond has a surface area of approximately 9.1 acres. Its average depth is 1.1 feet with a maximum depth of 4.3 feet. Cobb Avenue separates Elginwood Pond from Mill Pond, a small impoundment between Cobb Avenue and Elginwood Pond Dam. Elginwood Pond Dam is located at the northwestern end of Mill Pond and serves to impound Mill Pond, Elginwood Pond, and Crystal Lake. Water passing over the dam enters Norris Brook, which travels north through a small residential area and an extensive wetland system before joining the Ipswich River just north of the Peabody-Danvers boundary.

Studies of the water bodies since 1995 have documented the effects of eutrophication from non-point source pollution entering the ponds through stormwater runoff and other sources. These effects include low dissolved oxygen and poor water quality due to increased nitrogen and phosphorous levels, algal blooms, dense growths of nuisance aquatic weeds, and a thick organic sediment layer. Crystal Lake has been classified as a Category 5 impaired water body requiring a Total Maximum Daily Load (TMDL). Impaired uses include primary and secondary contact, aquatic life, aesthetic, and fish consumption. The City collected sediment samples in 2014. Samples from both ponds included metals and contaminants at levels that exceeded background concentrations, but did not exceed Massachusetts Contingency Plan (MCP) standards for soil. Nevertheless, the sediment will not be suitable for unrestricted reuse and must be disposed of at an appropriate facility.

Previous MEPA Review

The EENF included a history of the project's review under MEPA. The City first filed an ENF for the dredging of Crystal Lake in 1997, proposing to mechanically dredge the pond with a partial drawdown of the lake. A certificate issued in December, 1997 required an EIR. A Notice of Project Change (NPC) filed in 1999 proposed the full drawdown of the lake. A Certificate was issued in July, 2001 stating that the project still required an EIR. In 2000, the City filed another NPC with an EIR waiver request, changing the dredging method to hydraulic dredging with mechanical drying of the sediments. The Certificate issued in February, 2001 in response to the second NPC indicated that it had been reviewed as an SEIR, and that no further MEPA review was required. The project subsequently received a 401 WQC from the Massachusetts Department of Environmental Protection (MassDEP), but the project was not constructed. In response to Requests for Advisory Opinions submitted by the City in 2005 and 2010, the MEPA Office confirmed that the City's on-going non-construction work related to the project maintained the validity of the 2001 Certificate and that no further MEPA review was required.

Jurisdiction and Permitting

The project is subject to a Mandatory EIR pursuant to 301 CMR Section 11.03(3)(a)(1)(b) of the MEPA regulations because it requires State Agency Actions and will alter ten or more acres of any other wetlands, in this case, Land Under Water (LUW). The project also exceeds the ENF thresholds at 301 CMR 11.03(3)(b)(1)(b) for alteration of 500 linear feet of inland bank; 301 CMR 11.03(3)(b)(3) for dredging of 10,000 or more cy of material; and 301 CMR 11.03(3)(b)(4) for disposal of 10,000 or more cy of dredged material. The project will require a 401 Water Quality Certificate (401 WQC), a permit for landfill liner repair, and a landfill Authorization to Operate from the MassDEP. The project is seeking funding through the Environmental Bond Fund.

The project will also require Orders of Conditions from the Peabody Conservation Commission, or in the case of an appeal, Superseding Order(s) of Conditions from MassDEP. The project is subject to the MEPA Greenhouse Gas (GHG) Emissions Policy and Protocol. The project may require a Clean Water Act Section 404 Individual Permit from the United States Army Corps of Engineers (ACOE) and a National Pollutant Discharge Elimination System Construction General Permit (NPDES CGP) from the United States Environmental Protection Agency (EPA).

Because the project is seeking State Financial Assistance, MEPA jurisdiction is broad in scope and extends to all aspects of the project that may cause Damage to the Environment, as defined in the MEPA regulations. These include land alteration, wetlands, water quality, and GHG emissions.

Environmental Impacts and Mitigation

The project will improve the aquatic habitat, water quality, and recreational opportunities of Crystal Lake and Elginwood Pond by deepening the water bodies, removing nutrient-laden sediments and invasive aquatic vegetation, and constructing recreational amenities including a floating dock, a fishing pier, a gazebo, and walking trails. Dredging the ponds, including associated staging and site access requirements, will impact approximately 20.5 acres of Land

Under Water (LUW) due to the drawdown and dredging of the ponds; 520 linear feet (lf) of Bank and 2,500 square feet (sf) of Bordering Vegetated Wetlands (BVW) for construction access purposes, and approximately 15,000 sf of Bordering Land Subject to Flooding (BLSF) during dredging operations and for the construction of the park amenities. The project includes measures for preventing sedimentation and erosion impacts during construction and measures to restore impacted wetlands areas upon completion of construction.

Waiver and SEIR Requests

The City requested that I issue a Phase 1 Waiver pursuant to 301 CMR 11.11(4) to allow Phase 1 of the project to proceed prior to the completion of the EIR process for the entire project and to allow the filing of an SEIR pursuant to Section 11.06 (8) of the MEPA regulations. The City provided an EENF to support these requests which included alternatives analysis, identification of baseline environmental conditions and identification of measures to avoid, minimize and mitigate environmental impacts. Pursuant to these requests, the EENF was subject to an extended review period.

The regulations indicate that I may waive any provision or requirement in 301 CMR 11.00 not specifically required by MEPA and may impose appropriate and relevant conditions or restrictions, provided that I find that strict compliance with the provision or requirement would:

- (a) result in an undue hardship for the Proponent, unless based on delay in compliance by the Proponent; and*
- (b) not serve to avoid or minimize Damage to the Environment.*

The regulations at 301 CMR 11.11(4) state that, in the case of a partial waiver of a mandatory EIR review threshold that will allow the Proponent to proceed with Phase 1 of the project prior to preparing an EIR, I shall base the finding required in accordance with 301 CMR 11.11(1)(b) on a determination that:

- (a) the potential environmental impacts of Phase 1, taken alone, are insignificant;*
- (b) ample and unconstrained infrastructure facilities and services exist to support Phase 1;*
- (c) the project is severable, such that Phase 1 does not require the implementation of any other future phase of the project or restrict the means by which potential environmental impacts from any other phase of the project may be avoided, minimized or mitigated; **and***
- (d) the agency action(s) on Phase 1 will contain terms such as a condition or restriction, so as to ensure due compliance with MEPA and 301 CMR 11.00 prior to commencement of any other phase of the project.*

The City has submitted a comprehensive EENF to support these requests and I appreciate their interest in accelerating the schedule for this project. The project purpose is to improve water quality, habitat and recreation; however, Phase 1, on its own, will alter ten or more acres of LUW which exceeds the Mandatory EIR threshold (alteration of ten or more acres of any other wetlands). The MEPA review thresholds have been established to identify projects that are likely to cause Damage to the Environment and are presumed to represent a significant level of impact. For this reason, Phase 1 Waivers are not granted for Phase 1 projects that, on their own, exceed EIR thresholds and I cannot make a finding that the potential environmental impacts are insignificant.

An SEIR may be allowed, provided that the EENF:

- a) describes and analyzes all aspects of the project and all feasible alternatives, regardless of any jurisdictional or other limitation that may apply to the Scope;*
- b) provides a detailed baseline in relation to which potential environmental impacts and mitigation measures can be assessed; and,*
- c) demonstrates that the planning and design of the Project use all feasible means to avoid potential environmental impacts.*

The EENF included a detailed project description, an alternatives analysis, baseline environmental conditions, and identified mitigation measures to support the request for an SEIR. Based on the review of the EENF and consultation with State Agencies, the City may submit an SEIR in accordance with the Scope below.

Review of the EENF

The EENF provided information about the existing conditions in the water bodies, including wetlands, rare species, land use, vegetation, wildlife, drainage patterns, groundwater, and cultural resources, and reviewed alternative dredging and dewatering methods and disposal sites. The EENF reviewed the City's progress on implementing the recommendations of the Watershed Management Plan for the Crystal Lake and Elginwood Pond watersheds prepared in 2000. During the review period, the City provided additional information about the method for redirecting water from Crystal Lake into Elginwood Pond, an analysis of the potential for downstream flooding during dewatering of the ponds, the results of a fish survey, and a new alternative method for handling the existing fish populations within the water bodies prior to drawdown.

Alternatives Analysis

The EENF reviewed alternatives for meeting the project goals of improving water quality, aquatic habitat, and recreational use of the ponds. Water quality could be improved by implementing a pond management program including pre-treatment of stormwater entering the ponds using Best Management Practices (BMPs), educating the public about the effects of stormwater pollution, improving municipal housekeeping practices for roadways and other infrastructure, and managing aquatic vegetation in the ponds. Pond management measures alone cannot meet the project objectives because they would not address recreational goals nor remove nutrient-laden sediments. The City has determined that dredging would address all of the project objectives by deepening the ponds, and physically removing sediments and invasive aquatic vegetation.

The EENF reviewed three alternative dredging methods: hydraulic dredging, wet mechanical dredging, and dry mechanical dredging. Hydraulic dredging entails the use of barge mounted equipment to withdraw sediments and water through hoses and discharge the mixture at a dewatering location. Hydraulic dredging reduces turbidity and direct impacts to wetlands resource areas caused by mechanical dredging and features high production rates. Because of the high volume of water mixed with the sediment, hydraulic dredging requires a large dewatering area or the use of mechanical dewatering techniques. According to the EENF, mechanical

dewatering is infeasible due to its cost and because a staging area for this process is no longer available due to the development of the Independence Greenway on the former railroad right-of-way. The use of drying lagoons was investigated, but a nearby area that could accommodate lagoons of sufficient size is located within a Zone II water supply protection area, within which the dewatering activity may be prohibited by MassDEP. In addition, the ponds have characteristics, including shallow depth, dense aquatic vegetation, and submerged obstacles such as tree stumps and boulders, that may render hydraulic dredging ineffective. As noted in the EENF, if the withdrawal of the sediment/water mix by hydraulic dredging exceeds the inflow of water into the pond, then the pond may be effectively drawn down, introducing additional impacts similar to the Preferred Alternative through the exposure of the pond bottom.

Wet mechanical dredging would use barge-mounted or land-based excavators or cranes to dredge the pond while full of water. Impacts caused by turbidity and sediment migration are greater for this method compared to hydraulic dredging, but impacts to wetlands resources outside the dredge footprint can be minimized. Like hydraulic dredging, a large volume of water is removed along with the sediment, requiring a large dewatering area. Wet mechanical dredging would also require a large upland area for staging and access purposes, or alternatively, construction of staging areas and access roads within the ponds. This dredging method was not adopted due to the lack of adequate upland area for staging and access and the high cost and impacts associated with constructing staging areas in the ponds.

Preferred Alternative

The Preferred Alternative will involve drawing down the ponds, allowing the sediment to dewater in place, and then using mechanical equipment such as excavators and trucks directly on the dry pond bottom to dredge and transport the sediment. The advantages of this method include no need for an extensive upland area for staging, access, and dewatering; the ability to perform the dredging more precisely since the work area would be visible to the operator of the equipment; and a lower overall project cost that would allow for a greater area to be dredged. This alternative will result in temporary impacts over a greater area as a result of the exposure of the pond bottom during the drawdown and the placement of timber mats to support construction equipment, but would minimize impacts to upland areas as compared to other methods.

The Preferred Alternative will require extensive installation of cofferdams, pumps, sumps, and bypass piping to draw down and maintain the pond in a dewatered condition. For the dredging of Crystal Lake (Phase 1), a large pump will be used to remove most of the water from the pond. The water will be pumped through a pipe or hose to a discharge point within a cofferdam installed at the western end of Elginwood Pond near the culvert connecting the water bodies. The cofferdam will be equipped with siltation and energy dissipation controls. A temporary cofferdam will be installed around the primary sources of surface inflow near the intersections of Russell, Goodale, and Lowell Streets. Inputs from several water sources will be discharged behind this cofferdam, including a culverted stream, stormwater outfalls, and a culvert carrying flow from the wetland area north of Lowell Street. Water collected within this cofferdam will be redirected into the cofferdam installed in Elginwood Pond. The EENF noted that small flow from another stormwater discharge pipe will be redirected as necessary by the contractor. Small pools of water remaining after the drawdown and groundwater seepage will be collected in sumps and discharged into Elginwood Pond.

The drawdown of Elginwood Pond (Phase 2) will be accomplished in a similar manner, except that the water pumped from Elginwood Pond and redirected flows will be discharged below the Elginwood Pond Dam into Norris Brook. The pond has two primary inflows, at the southwestern end of the pond and at the west side at Lake Street. The City will also temporarily remove a section of Cobb Avenue, which forms a barrier between Elginwood Pond and the dam, in order to facilitate the draining of the pond. Residents of Cobb Avenue will not be able to enter Cobb Avenue from its intersection with Lowell Street and will instead be required to enter from western end of the street at its intersection with Lake Street.

Drawing down the pond would eliminate aquatic habitat necessary to support fish and other animals. During the drawdown of each pond, some fish and other mobile aquatic species may seek areas of adequate water depth and move into the water body not being dredged, but many may become trapped and die in shallow areas that will eventually drain completely. The City considered several approaches to mitigating this impact. Relocating the fish prior to dredging to either another water body not undergoing dredging would reduce short-term mortality compared to alternatives that would leave the fish in place during the drawdown. This alternative could result in negative impacts to the receiving water body from overcrowding, including rapidly depleting the food supply and dissolved oxygen levels and increasing the concentration of waste products such as ammonia. The City considered two alternatives that would not relocate fish prior to dredging. In either case, fish remaining in the pond would die, leaving rotting carcasses that would cause a nuisance odor before being disposed of along with the dewatered sediment. The City's Preferred Alternative is to hold a fishing derby to help publicize the project and to reduce the number of fish left in the pond prior to the drawdown.

Wetlands and Water Quality

The project will impact wetlands resource areas in or adjacent to the water bodies, including LUW, Bank, BVW, as well as BLSF. Wetlands impacts of Phase 1 include 11 acres of LUW in Crystal Lake and Elginwood Pond due to the drawdown of the lake and dredging activities; 200 lf of the Bank of Crystal Lake; and approximately 10,500 sf of BLSF where the park amenities are planned along the shore of the lake. According to the EENF, this land area is not included within the 100-year floodplain on the most recent Flood Insurance Rate Maps (FIRM), effective July 3, 2012, prepared by the Federal Emergency Management Agency (FEMA). The more conservative delineation of this area as BLSF is based on the City's analysis of the hydraulic capacity of the Elginwood Pond Dam. Phase 2 of the project will impact 320 lf of the Bank of Elginwood Pond; 2,500 sf of BVW; 9.5 acres of LUW; and 5,000 sf of BLSF. According to the EENF, temporary impacts to BVW are necessary to provide construction access to Elginwood Pond.

The EENF identified construction-period measures for reducing impacts. Swamp mats or granular materials underlain by filter fabric will be placed over the Bank and vegetated shallow areas to reduce impacts to resource areas from construction vehicles. Erosion control barriers, including straw or compost wattles, will be placed along upland limits of work. Stone construction entrance pads will be installed at entrances to access routes to prevent the spread of material from the site.

Upon completion of dredging, three submerged habitat features will be placed on the bottom of Crystal Lake and one feature will be placed in Elginwood Pond. Each feature will be

approximately 600 sf in area and will include logs recovered from the site clearing phase of the project and pieces of concrete recovered from the building foundation at the staging area. These materials will be cabled together to prevent logs from floating. Temporary access roads will be removed after these features are placed. Disturbed vegetated shallows areas will be seeded with a wetlands seed mix. In places where the Bank was destabilized during construction, the Bank will be restored with geotextile-encapsulated soil lifts planted with native plants and seeded with wetland conservation mix.

Sediment Disposal

Dewatered sediment will be transported by truck to the Peabody municipal landfill. It will be disposed of at the South Mound Swale, a section of the landfill that was constructed to receive solid waste from an energy-from-waste facility, but was never used. The South Mound Swale is lined with a single composite layer system, including a leachate collection system that transfers leachate to the South Essex Sewage District's wastewater treatment plant. The project will make repairs to the liner in this section of the landfill to make it suitable for accepting the dredged material. The City will also seek an Authorization to Operate the South Mound Swale from MassDEP.

According to the EENF, sediment that has not had sufficient time to dewater within the ponds will be transported to the landfill in trucks with waterproof beds. Prior to final disposal in the South Mound Swale, the material will be deposited within an erosion-control barrier to allow for additional dewatering. Sediment that has been adequately dewatered at the project site and passes the paint filter test will be transported to the landfill and placed directly into the South Mound Swale.

Conclusion

The EENF provided a comprehensive EENF that included information about existing conditions, alternatives considered during project development and design, and details of the implementation of the Preferred Alternative with respect to dredging, dewatering, and disposal of the sediments and drawdown and bypassing of the ponds during the project. As noted above, based on review of the EENF and consultation with State Agencies, I will allow the Proponent to file an SEIR rather than a Draft and a Final EIR. This will significantly reduce the timeline for MEPA review. The SEIR should be prepared in accordance with the scope below.

SCOPE

General

The SEIR should follow Section 11.07 of the MEPA regulations for outline and content, as modified by this scope. The EENF and supporting information submitted during the review period thoroughly described the project and its impacts. The SEIR should include the information provided during the EENF review period to facilitate public review of project. The focus of the SEIR should be to provide the additional information and analysis requested herein for Phase 2, and to a lesser extent on Phase 1; respond to comments received on the EENF; and identify and commit to environmental mitigation measures. The SEIR should describe measures

that will be undertaken as part of the City's post-construction Lake and Watershed Management Program, including public education about watershed management. I encourage the City to update the Watershed management Program in connection with completing this project to ensure that its benefits are maintained into the future. The SEIR should include draft Section 61 Findings for each state agency action.

Project Description and Permitting

The SEIR should describe any changes to the project and discuss any additional information prepared by the City since the filing of the EENF. The SEIR should clearly identify the impacts of the Preferred Alternative, and identify measures to avoid, minimize and mitigate unavoidable impacts. The SEIR should include updated site plans, as necessary, to reflect modifications to the dredge footprint, drawdown and bypassing procedures, sediment disposal location, wetlands or habitat restoration, and park design. The SEIR should provide a brief description and analysis of applicable statutory and regulatory standards and requirements and explain how the project will meet those standards. The SEIR should include a list of required State Agency permits, Financial Assistance, or other State approvals and provide an update on the status of each of these pending actions, as well as any local or federal permitting underway.

Wetlands and Aquatic Habitat

The SEIR should identify any changes in the location or nature of impacts to wetland resource area and identify measures to minimize and mitigate impacts, including wetlands restoration. As requested by MassDEP, the City should consider alternative access points for the Elginwood Pond dredging to reduce impacts to BVW and provide a plan for restoring impacted BVW. The SEIR should provide greater detail, including plans, showing wetlands resource areas and surface waters in relation to dredging, drawdown, and restoration activities. The SEIR should review how the project, including mitigation measures, complies with the Wetlands Protection Act performance standards for the applicable resource areas. MassDEP prefers that the swamp mats, rather than granular material, be used to provide a work surface for construction equipment in the ponds because swamp mats are easier to remove and facilitate restoration of resource areas. In the SEIR, the City should either commit to using swamp mats or further describe measures for restoring areas where the granular base was used.

The EENF noted the possibility that private drinking wells serving residences on Cobb Avenue and Crystal Drive may be impacted by the drawdown of Elginwood Pond in Phase 2. The SEIR should provide information about groundwater conditions in the vicinity of Elginwood Pond and include an analysis of potential impacts of the Phase 2 drawdown on nearby drinking wells and wetlands resource areas. According to the EENF, drinking well yields could be significantly affected by the drawdown if the wells are shallow, in which case the City could provide temporary or permanent water service to the affected residents. The SEIR should describe any potential impacts associated with providing water service to these residents.

The Division of Fisheries and Wildlife (MassWildlife) supports the City's preferred method for minimizing impacts to the existing populations of aquatic organisms. I recommend that the City consult with MassWildlife prior to filing the SEIR with respect to any regulations or procedures that may be applicable to the pre-dredging fish harvest and the Agency's recommendations for effective benthic habitat enhancement measures that could be implemented

upon completion of dredging. The SEIR should summarize the results of its consultation with MassWildlife and describe any changes to the project resulting from the consultation.

Greenhouse Gas Emissions

The project is subject to the MEPA Greenhouse Gas Policy and Protocol (GHG Policy) because it exceeds thresholds for a mandatory EIR. The GHG Policy includes a *de minimis* exemption for projects that will produce minimal amounts of GHG emissions on an on-going basis. Given the nature of the project, I have concluded that this project falls under the *de minimis* exemption; therefore, the Proponent is not required to prepare a GHG analysis. However, I encourage the Proponent to incorporate measures to avoid and minimize GHG emissions (and other air pollutants) during the construction period through the use of emissions-reduction technologies.

Mitigation Measures and Draft Section 61 Findings

The SEIR should include a separate chapter summarizing proposed mitigation measures. This chapter should also include draft Section 61 Findings for each State Agency that will issue permits for the project. The SEIR should contain clear commitments to implement mitigation measures, estimate the individual costs of each proposed measure, identify the parties responsible for implementation, and contain a schedule for implementation.

Responses to Comments

The SEIR should contain a copy of this Certificate and a copy of each comment letter received. In order to ensure that the issues raised by commenters are addressed, the SEIR should include direct responses to comments to the extent that they are within MEPA jurisdiction. This directive is not intended, and shall not be construed, to enlarge the scope of the SEIR beyond what has been expressly identified in this certificate.

Circulation

The City should circulate the SEIR to those parties who commented on the EENF, to any State Agencies from which the City will seek permits or approvals, and to any parties specified in section 11.16 of the MEPA regulations. A copy of the SEIR should be made available for review at the Peabody Public Library.

July 17, 2015

Date



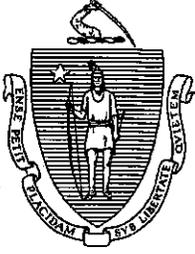
Matthew A. Beaton

Comments received:

05/26/2015 Board of Underwater Archaeological Resources (BUAR)

07/10/2015 Massachusetts Department of Environmental Protection (MassDEP)– Northeast
Regional Office (NERO)
07/15/2015 Mayor Edward A. Bettencourt, Jr., City of Peabody
07/15/2015 Representative Leah Cole, 12th Essex District
07/16/2015 Massachusetts Division of Fisheries and Wildlife (MassWildlife)

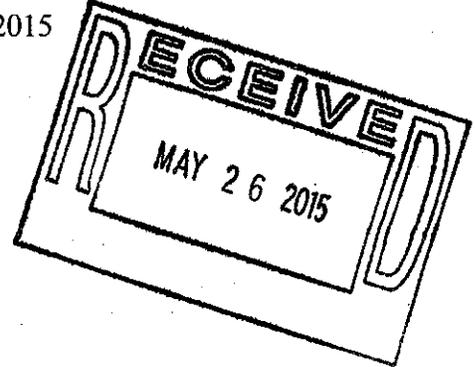
MAB/AJS/ajs



AS

The COMMONWEALTH OF MASSACHUSETTS
BOARD OF UNDERWATER ARCHAEOLOGICAL RESOURCES
EXECUTIVE OFFICE OF ENERGY AND ENVIRONMENTAL AFFAIRS
251 Causeway Street, Suite 800, Boston, MA 02114-2136
Tel. (617) 626-1141 Fax (617) 626-1240 Web Site: www.mass.gov/eea/agencies/czm/buar/

May 26, 2015



Secretary Matthew A. Beaton
Executive Office of Energy and Environmental Affairs
Attention: Alex Strycky, MEPA Unit
100 Cambridge St., Suite 900
Boston, MA 02114

RE: Crystal Lake and Elginwood Pond Dredging, Lowell Street, Peabody (EEA #15366)

Dear Secretary Beaton,

The staff of the Massachusetts Board of Underwater Archaeological Resources has reviewed the above referenced project's EENF (#15366) and supporting materials prepared by Tighe & Bond, Inc., on behalf of the City of Peabody. We offer the following comments.

The Board has conducted a preliminary review of its files and secondary literature sources to identify known and potential submerged cultural resources in the proposed project area. No record of any underwater archaeological resources was found. Based on the results of this review and given these lakes are largely the result of a man-made dam and mill downstream of the project area, the Board has determined that this project is unlikely to impact submerged cultural resources.

However, should heretofore-unknown submerged cultural resources, including isolated finds of historical objects, be encountered during the course of the project, the Board expects that the project's sponsor will take steps to limit adverse affects and notify the Board and the Massachusetts Historical Commission, as well as other appropriate agencies, immediately in accordance with the Board's *Policy Guidance for the Discovery of Unanticipated Archaeological Resources*.

The Board appreciates the opportunity to provide these comments. Should you have any questions regarding this letter, please do not hesitate to contact me at the address above, by email at victor.mastone@state.ma.us, or by telephone at (617) 626-1141.

Sincerely,

Victor T. Mastone
Director

/vtm



Commonwealth of Massachusetts
Executive Office of Energy & Environmental Affairs

Department of Environmental Protection

Northeast Regional Office • 205B Lowell Street, Wilmington MA 01887 • 978-694-3200

Charles D. Baker
Governor

Karyn E. Polito
Lieutenant Governor

Matthew A. Beaton
Secretary

Martin Suuberg
Commissioner

July 10, 2015

Matthew A. Beaton, Secretary
Executive Office of
Energy & Environmental Affairs
100 Cambridge Street
Boston MA, 02114

Attn: MEPA Unit

RE: Peabody
Crystal Lake/Elginwood Pond
Dredging Project
Lowell Street
EEA # 15366 (EEA #11325)

Dear Secretary Beaton:

The Department of Environmental Protection Northeast Regional Office (MassDEP) has reviewed the Expanded Environmental Notification Form (EENF) submitted by the City of Peabody to dredge Crystal Lake (9.5 acres) and Elginwood Pond (9.1 acres), two adjacent waterbodies to depths of eight feet with 6:1 side slopes (EEA# 15366). The dredging footprint would be a minimum of 25 feet from the shallow vegetated areas in most areas. It is estimated that about 51,500 cubic yards (cy) of pond muck/sediment would be dredged from Crystal Lake and the eastern end of Elginwood Pond in Phase 1, and an additional 31,000 cy would be removed from Elginwood Pond in Phase 2, which is being deferred due to insufficient funding. The preferred plan is to drawdown the waterbodies through pumping in order to provide access to the pond bottom sediment, which would be removed by bulldozers and excavators prior to being loaded on trucks for transport to the Peabody Landfill (off Farm Avenue) for disposal. The Phase 1 dredging is proposed for the Fall of 2015 through the Spring of 2016. In addition to restoring aquatic habitat and recreational opportunities by dredging, the City has plans in Phase 1 to add a floating dock and a fixed pier in Crystal Lake. These facilities would be located adjacent to a previously disturbed upland area that will be cleaned up and replanted for use as parkland with picnic tables, a gazebo, and a trail with an overlook of the pond. The Independence Greenway rail trail is routed between the two ponds. The trail extends from the North Shore Mall to the Ipswich River in Peabody.

The proposed project is categorically included for the preparation of an environmental impact report (EIR). The City of Peabody is requesting a Phase I waiver for the dredging of Crystal Lake, and the submittal of a single EIR for the project. This project has been previously reviewed under the Massachusetts Environmental Policy Act (MEPA) in 1999 and 2000, where a hydraulic

dredging method with mechanical dewatering of the sediments was preferred because of “(s)ubstantial cost savings associated with mechanical drying of hydraulically-dredged sediments.”¹ MassDEP provides the following comments.

Alternatives

The Final Generic Environmental Impact Report (GEIR), *Eutrophication and Aquatic Plant Management in Massachusetts*, dated July 2003² states, “Sound lake management must focus on the possible, not the perfect. Lake management will seek to: (1) be effective, (2) be inexpensive, or at least affordable, (3) cause few adverse impacts, and (4) be socially, politically, and scientifically feasible.”

The MEPA review history for this project has not established a consistent, single preferred alternative. In an earlier review, it was reported that hydraulic dredging would have reduced cost, less environmental impact, less aesthetic impact, and would be a faster method than is now proposed. The EENF, however, indicates that hydraulic dredging is likely to have greater long-term and off-site impacts, and the alternatives analysis in Section 4 of the EENF indicates that the high cost of dewatering and loss of staging area has resulted in the elimination of hydraulic dredging from consideration. The current preferred alternative would require mechanical drawdown of the ponds, relocation of fish and invertebrates, excavation of pond sediment, dewatering of the sediment in place, removal and disposal of the dried material, natural refilling of the ponds’, and restocking of fish.

Although it is now the City’s preferred alternative, lake and pond drawdown projects may have significant environmental impacts, and there are potential groundwater-related issues that should be considered, such as seepage which could hamper dewatering, and groundwater depletion which could impact nearby private wells (are there any private wells nearby?). Although reported at the MEPA consultation session that dewatering would only take several days (because there is more peat in the sediments than formerly known), groundwater seepage has the potential to lengthen the dewatering phase and increase costs. Weather conditions could also slow the drawdown, sediment drying, and pond refilling.

Wetlands

The EENF indicates that 2,500 square feet (sf) of bordering vegetated wetlands (BVW) would be impacted temporarily for dredging equipment to access the waterbodies. As the previously proposed dredging project was reported to avoid impacts to BVW entirely, it is requested that the City revisit the previous plan to assess whether it would be feasible to undertake the dredging project from an access point that would not impact BVW. In addition, precautions must be taken to maintain hydraulic connectivity of the wetlands, and avoid dewatering and stockpiling dredged sediment within and near BVW.

The EENF does not appear to consider bordering vegetated wetlands replication other than possibly a reference to seeding “disturbed vegetated shallows” with wetland plants (page 3-7). However, when the proponent files the Notice of Intent for the project under the Wetlands

¹ ENSR correspondence to Secretary Durand, November 14, 2000.

² The GEIR provides guidance on lake management techniques for the control of nutrients and aquatic plants, consistent with the Commonwealth’s Policy on Lake and Pond Management.

Protection Act (WPA), a wetlands restoration and replication plan is a required element in order to comply with the performance standards of the WPA and the Wetlands Regulations. The wetlands replication/restoration must be consistent with the BVW performance standards in 310 CMR 10.55(4), and the design for the replication should comply with the MassDEP *Massachusetts Inland Wetland Replication Guidelines*, March 2002.

The project also will impact 520 linear feet (lf) of bank (25 lf permanent), 910,500 sf of land under water (LUW) (15 sf permanent) in the areas to be dredged and 15,500 sf of bordering land subject to flooding (BLSF) (10,500 sf permanent). The Notice of Intent files will also need to demonstrate that the project complies with the performance standards in the Wetlands Regulations for alterations to these resource areas.

The EENF briefly describes the proposed bank restoration with geotextile-encapsulated soil lifts planted with live-staked native plants. Plans and specifications for this work should support a demonstration that the project meets the performance standards for an inland bank resource. The LUW restoration plan for the ponds proposes to install "habitat features," comprised of pieces of the remnant concrete foundation on site, logs, and boulders on the bottom of the ponds. However, the EENF has not demonstrated that the concrete foundation would be suitable or approvable as a habitat feature. There also is no evidence that the proponent has consulted with the Division of Fisheries and Wildlife on the need for habitat features, or to affirm that the proposed habitat design would be appropriate. Supplemental information is needed to demonstrate that this work would meet the wetlands performance standards for LUW. In addition, alternative disposal options for the concrete demolition waste need to be identified. Finally, because there will be no filling in BLSF, compensatory flood storage would not be necessary.

To minimize construction impacts, swamp/timber mats should be used to support construction equipment rather than construction of temporary access roadways with filter fabric and gravel, which is an alternative identified in the EENF. To the extent practicable, the construction contractor should use low ground pressure equipment and wide or rubberized track tires to minimize impacts to wetlands resources. Equipment and materials must not be stored or stockpiled in wetland resources.

Erosion and sedimentation controls must be used at the discharges from the drawdown pumps and outlets to the ponds in order to minimize turbidity and conveyance of sediment downstream. The EENF indicates that when the water level approaches the lake bottom, dewatering sumps will be constructed to contain sediment. A clear protocol for monitoring and responding to turbidity needs to be established and implemented to ensure that sediment controls, such as the proposed sump and standpipe sediment control systems are deployed in a timely way to avoid pumping sediment-laden pond water downstream. Secondary containment also should be provided around pumps and adsorbent pads should be placed under construction equipment stored on site in order to contain leaks and spills. In addition, an invasive species management plan should be prepared for the wetlands resource areas affected by the drawdown.

The dredging work is proposed during the fall and winter months when vegetation is dormant. However, the dewatering of the pond will displace fish, amphibians, and other invertebrates. Although the EENF indicates that fish will be relocated by electrofishing before the

project begins, drawdown of the ponds should be monitored daily for stranded fish and invertebrates, which should be relocated in the adjacent pond or downstream. In addition, it is noted that the EENF indicates that the drawdown of Elginwood Pond may have impacts on the groundwater elevations such that private wells in the vicinity of the pond may be affected (page 3-4). This issue requires further consideration to understand the impacts of the pond drawdown.

Stormwater

A Watershed Management Plan developed by the City in 2000 is reported to provide stormwater management controls to minimize the need for future dredging of the ponds. The EENF indicates that updates would be developed based on current conditions and understanding of stormwater and watershed management. Based on a review of the Plan and the comments that follow, MassDEP recommends that it be updated as soon as possible.

For consistency with the wetlands regulations in 310 CMR 10.05(6)(k), the Plan indicates that sediment forebays would be constructed within the ponds (Appendix D, Section 3.1.1). However, as noted in the EENF (page 3-9), wetland resources^[2], including land under water, may not be altered or filled for the control of sedimentation or the attenuation of pollutants in stormwater discharges. In addition, the Stormwater Management Standard 1 specifies that new stormwater outfalls may not cause erosion of wetlands or waters of the Commonwealth. Therefore, the Plan will need to be changed, to ensure that any new stormwater management controls will not alter wetland resources or cause erosion or scour, for compliance with Standard 1, in accordance with the *Stormwater Management Handbooks*, Volume 3, Chapter 1 page 2.

MassDEP also notes that the City's annual street sweeping program is too infrequent to be effective in reducing sediment loading to the ponds through the existing street drainage system. It is unclear how often the streets are swept for compliance with Phase II stormwater requirements as noted in the EENF (page 3-10). However, to effectively minimize sediment loading into the ponds and their tributaries, it is recommended that the City revise its street sweeping plan consistent with the techniques reported to be effective in the *Stormwater Management Handbooks*, Volume 2, Chapter 1, page 8.

The link provided in the Plan (<https://www.ci.peabody.ma.us>) apparently was never activated as it is not associated with a webpage, and the EENF indicates that the webpage is still in planning. The City is encouraged to activate the webpage as soon as possible, and also establish a Twitter feed to keep residents of the watershed apprised of the project and its progress.

The City is reported to be working to implement BMPs other than sediment forebays to control sediment in stormwater runoff. Based on the discussions at the MEPA consultation session held on May 21, MassDEP recommends that the City develop a better understanding of the watershed areas contributing to the ponds, in order to target those areas for low impact development techniques, source controls, and outreach on stormwater related topics, such as the use of herbicides, pesticides, and pet waste management.

^[2] Except bordering land subject to flooding, isolated land subject to flooding, land subject to coastal storm flowage, or riverfront area.

Crystal Lake (MA92013) is an impaired water body on the Category 5 list, (for the preparation of a total maximum daily load (TMDL)). The impairments identified on the *Massachusetts Year 2012 Integrated List of Waters* include chlorophyll A, excess algal growth, total phosphorus, and Secchi disk transparency. These impairments correlate with eutrophication of the pond. Controlling total phosphorus in the watershed will help to prolong the improvements that will be achieved with dredging. Accordingly, the City of Peabody should consider implementation of an effective source control program as part of the Watershed Management Plan in the interim until a TMDL has established guidance for restoring water quality in Crystal Lake.

Solid Waste

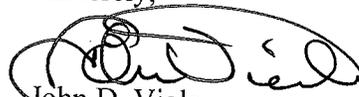
As discussed in Section 4.4 of the EENF the preferred alternative for the management of the dredged spoils is the placement of the material in the South Mound Swale of the City of Peabody Landfill. Placement of the Crystal Lake dredge spoils in the South Mound Swale will require approval by the MassDEP pursuant to 310 CMR 19.000, the Massachusetts Solid Waste Regulations. The City and MassDEP have met and discussed the requirements for the City to obtain the approval. As a result, the City's consultant, with MassDEP's approval, is conducting an assessment of the condition of the South Mound Swale as the initial step in this process.

Errata

The USGS topographic map (Figure 1, Appendix A) identifies one of the waterbodies as Crystal Pond, not Crystal Lake. Also, Figure 3 and Figure 4 (page 2-5) have mislabeled Crystal Pond. These figures identify the waterbody as Elginwood Pond.

The MassDEP Northeast Regional Office appreciates the opportunity to comment on this proposed project. Please contact Rachel.Freed@state.ma.us at (978) 694-3258 for information on wetlands issues, and Derek.Standish@state.ma.us at (617) 654-6511 for further information on 401 Water Quality Certification. If you have any general questions regarding these comments, please contact Nancy.Baker@state.ma.us, MEPA Review Coordinator at (978) 694-3338.

Sincerely,



John D. Viola

Deputy Regional Director

cc: Brona Simon, Massachusetts Historical Commission
Derek Standish, MassDEP-Boston
Eric Worrall, Rachel Freed, Heidi Davis, Phil DiPietro, MassDEP-NERO
City of Peabody, Conservation Commission

CITY OF PEABODY

24 Lowell Street
Peabody, Massachusetts 01960



P. 978-538-5700
F. 978-538-5980

OFFICE OF THE MAYOR EDWARD A. BETTENCOURT, JR.

July 15, 2015

Matthew A. Beaton, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

RE: **Crystal Lake and Elginwood Pond Dredging Project**
EEA No. 15366
Peabody, Massachusetts

Dear Secretary Beaton:

The City of Peabody has been diligently working to improve water resources and recreational opportunities in West Peabody. Crystal Lake and Elginwood Pond are municipally-owned waterbodies in West Peabody that are severely degraded as a result of eutrophication. The City has been working towards the restoration of aquatic habitat and recreational resources in the ponds for many years. Finally, the City has the good fortune to have the funding available to restore one of the ponds, Crystal Lake, and has been making significant progress towards that goal over the course of the last two years. The City's goal is to start the dredging this coming winter when residents are indoors and less likely to be impacted by the temporary odors and noise during construction. The project is currently under review by the MEPA office.

The City has requested a Phase I waiver and Single Environmental Impact Report (EIR) for the work at Crystal Lake, since funding to perform the Elginwood Pond phase of the project is not currently available and the timeframe for performing the project is not known. The City submitted a comprehensive Expanded ENF (EENF) and supplemental information during the review period that has addressed many of the questions and comments that were raised by regulatory agencies and the Public during the review period. Remaining questions are minor and can be addressed during subsequent permitting processes. The Crystal Lake dredging portion of the project fully meets the criteria for a Phase I Waiver outlined at 301 CMR 11.11(4), and the City intends to fully comply with MEPA through the submittal of a subsequent EIR.

We have recently learned that our Crystal Lake dredging project may be delayed for up to a year due to a potential denial of the Phase I Waiver request. I cannot overemphasize the importance to our City that Phase I of the Crystal Lake and Elginwood

Pond Dredging project advance on schedule. The City hopes to start construction in November of 2015, and needs to obtain permits and complete the public bidding process before that time. Completion of work during the upcoming winter months will significantly reduce nuisance odor and construction noise burdens on nearby residents and businesses. If the work cannot happen this fall, the project will be delayed by one full year.

As demonstrated in the EENF and subsequent information provided to the MEPA office, preparation of an EIR for the Crystal Lake dredging project will not serve to avoid or minimize damage to the environment, and will place an undue hardship on the City. The environmental impacts associated with the Phase I work are temporary and associated with drawdown of the pond to facilitate the dredging. The project will result in ecological restoration of a severely degraded aquatic resource.

In addition, your Executive Office has granted full EIR waivers for inland dredging projects in recent times, as summarized below.

1. Milford Pond, Town of Milford (EEA No. 15201).
2. Nashawannuck Pond, City of Easthampton (EEA No. 13959).

Each of these projects far exceeded both the EIR thresholds set forth in the MEPA regulations at 301 CMR 11.00, as well as the Phase I and II scopes of work proposed at Crystal Lake and Elginwood Pond in Peabody.

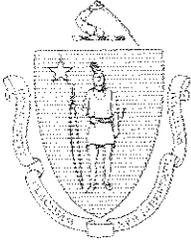
As such, I respectfully request your consideration of the Phase I Waiver to allow the Crystal Lake improvements to proceed. The EENF for the project includes all data and information required for the Phase I project, and an EIR would essentially be a "repackaging" of the Expanded ENF and supplemental information. This exercise would serve only to prolong the project timeline and delay the bidding and construction process, while providing no additional environmental benefits.

Very truly yours,



Edward A. Bettencourt, Jr.
Mayor

Copy: Alex Strycky, MEPA
Ned Bartlett, EEA Undersecretary
Deirdre Buckley, MEPA Director
Martin Suuberg, MassDEP Commissioner
Eric Worrall, MassDEP Regional Director
David A. Murphy, P.E., Vice President, Tighe & Bond, Inc.



The Commonwealth of Massachusetts

HOUSE OF REPRESENTATIVES
STATE HOUSE, BOSTON 02133-1054

LEAH COLE
STATE REPRESENTATIVE
12TH ESSEX DISTRICT

Committees:
Healthcare Financing
Elder Affairs

STATE HOUSE, ROOM 238
TEL (617) 722-2400
Leah.Cole@MAhouse.gov

July 15, 2015

Matthew A. Beaton, Secretary
Executive Office of Energy and Environmental Affairs
100 Cambridge Street, Suite 900
Boston, MA 02114

Re: **Crystal Lake and Elginwood Pond Dredging Project**
EEA No. 15366
Peabody, Massachusetts

Dear Secretary Beaton: *Matt*

The City of Peabody has been diligently working to improve water resources and recreational opportunities in West Peabody. Crystal Lake and Elginwood Pond are municipally-owned waterbodies in West Peabody that are severely degraded as a result of eutrophication. The City has been working towards the restoration of aquatic habitat and recreational resources in the ponds for many years. Finally, the City has the good fortune to have the funding available to restore one of the ponds, Crystal Lake, and has been making significant progress towards that goal over the course of the last two years. The City's goal is to start the dredging this coming winter when residents are indoors and less likely to be impacted by the temporary odors and noise during construction. The project is currently under review by the MEPA office.

The City has requested a Phase I waiver and Single Environmental Impact Report (EIR) for the work at Crystal Lake, since funding to perform the Elginwood Pond phase of the project is not currently available and the timeframe for performing the project is not known. The City submitted a comprehensive Expanded ENF (EENF) and supplemental information during the review period that has addressed many of the questions and comments that were raised by regulatory agencies and the Public during the review period. Remaining questions are minor and can be addressed during subsequent permitting processes. The Crystal Lake dredging portion of the project fully meets the criteria for a Phase I Waiver outlined at 301 CMR 11.11(4), and the City intends to fully comply with MEPA through the submittal of a subsequent EIR.

We have recently learned that our Crystal Lake dredging project may be delayed for up to a year due to a potential denial of the Phase I Waiver request. I cannot overemphasize the importance to our City that Phase I of the Crystal Lake and Elginwood Pond Dredging project advance on schedule. The City hopes to start construction in November of 2015, and needs to obtain permits and complete the public bidding process before that time. Completion of work during the upcoming winter months will significantly reduce nuisance

odor and construction noise burdens on nearby residents and businesses. If the work cannot happen this fall, the project will be delayed by one full year.

As demonstrated in the EENF and subsequent information provided to the MEPA office, preparation of an EIR for the Crystal Lake dredging project will not serve to avoid or minimize damage to the environment, and will place an undue hardship on the City. The environmental impacts associated with the Phase I work are temporary and associated with drawdown of the pond to facilitate the dredging. The project will result in ecological restoration of a severely degraded aquatic resource.

In addition, your Executive Office has granted full EIR waivers for inland dredging projects in recent times, as summarized below.

1. Milford Pond, Town of Milford (EEA No. 15201).
2. Nashawannuck Pond, City of Easthampton (EEA No. 13959).

Each of these projects far exceeded both the EIR thresholds set forth in the MEPA regulations at 301 CMR 11.00, as well as the Phase I and II scopes of work proposed at Crystal Lake and Elginwood Pond in Peabody.

As such, I respectfully request your consideration of the Phase I Waiver to allow the Crystal Lake improvements to proceed. The EENF for the project includes all data and information required for the Phase I project, and an EIR would essentially be a "repackaging" of the Expanded ENF and supplemental information. This exercise would serve only to prolong the project timeline and delay the bidding and construction process, while providing no additional environmental benefits.

Sincerely,



Leah Cole
State Representative
12th Essex District

Copy: Ned Bartlett, EEA Undersecretary
Deirdre Buckley, MEPA Director
David A. Murphy, P.E., Vice President, Tighe & Bond, Inc.

Strysky, Alexander (EEA)

From: Hartley, Richard (FWE)
Sent: Thursday, July 16, 2015 10:33 AM
To: Strysky, Alexander (EEA)
Subject: EEA No. 15366 Crystal Lake and Elginwood Pond (Peabody)

Alexander, the Fisheries Section of the Division has reviewed the EENF Supplemental Information relative to the proposal to dredge Crystal Lake and Elginwood Ponds in Peabody and is not opposed to the preferred alternative; **Alternative 2 – No pre-dredging fish location**. Please feel free to contact me should you have any questions or require further information.

Richard A. Hartley
Fisheries Biologist
MassWildlife
1 Rabbit Hill Road
Westborough, MA 01581
Phone (508) 389-6330
Fax (508) 389-7890

Strysky, Alexander (EEA)

From: Hartley, Richard (FWE)
Sent: Thursday, July 16, 2015 11:21 AM
To: Strysky, Alexander (EEA)
Subject: EEA No. 15366

Alex, per our recent conversation, I would like to add the following comments relative to the proposed dredging project.

Although the preferred alternative will result in the loss of the fish population of the dredged pond, in the long-term, the aquatic community of both ponds will ultimately benefit from the improved quality and quantity of fish habitat and will provide increased recreational opportunities.

As for the proposal to add habitat features to the newly dredged pond, regardless of the materials and or configuration, the Fisheries Section of the Division should be consulted directly.

Richard A. Hartley
Fisheries Biologist
MassWildlife
1 Rabbit Hill Road
Westborough, MA 01581
Phone (508) 389-6330
Fax (508) 389-7890