



THE COMMONWEALTH OF MASSACHUSETTS
WATER RESOURCES COMMISSION
100 CAMBRIDGE STREET, BOSTON MA 02114

Meeting Minutes for January 9, 2025

Meeting conducted remotely via Zoom meeting platform, 1:00 p.m.

Minutes approved April 10, 2025

Members in Attendance:

Vandana Rao	Designee, Executive Office of Energy and Environmental Affairs (EEA)
Chris Kluchman	Designee, Executive Office of Housing and Livable Communities (EOHLC) (Becca George served as designee until 1:43pm and after 2:58pm)
Duane LeVangie	Designee, Department of Environmental Protection (MassDEP)
Tyler Soleau	Designee, Massachusetts Office of Coastal Zone Management (CZM)
Anne Carroll	Designee, Department of Conservation and Recreation (DCR)
Todd Richards	Designee, Department of Fish and Game (DFG)
Hotze Wijnja	Designee, Department of Agricultural Resources (DAR)
Thomas Cambareri	Public Member
Christine Hatch	Public Member
Kenneth Weismantel	Public Member
Samantha Woods	Public Member

Members Absent

Vincent Ragucci	Public Member
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Others in Attendance:

Alex Taylor	DPU	Elizabeth McCann	MassDEP
Alexandra Wolfe	DFG	Emily Wilcox	MassDEP
Amanda Garms	DCR	Emma Sass	EEA
Andrew Brolovski	MassDEP	Erin Graham	DCR OWR
Andrew Smith	EEA	Francesco	DCR OWR
Avery Vreeland	MassDEP	Attacalite	
Becca George	EOHLC	Grace Oh	DCR
Bob FitzPatrick	DPU	Hannah Reardon	MassDEP
Brittany Segill	MassDEP	Hillary Monahan	MWRA
Caitlin Spence	EEA	Jason Brown	MassDEP
Callista Perry	DCR	Jason Duff	DCR OWR
Cathy Kam	DPU	Jen Keegan	DPU
Celeste De Palma	DCR	Jennifer Pederson	Mass Water Works Association
Connor McElroy	DPU	Jennifer Durso	MassDEP
Cynthia Nelson	MassDCR	Joy Duperault	DCR OWR
Dan Crocker	DCR-DWSP	JP Allen	DCR
Dave Schmidt	MDAR	Kate Bentsen	DER
David Foss	MassDEP	Katie Paight	DCR OWR
Edwin Sumargo	EEA	Larissa Parse	DCR
Elischia Fludd	DOER	Linda Tims	MassDEP

Linjun Yao	DEP	Sheila Kelliher	DOER
Lisa Luchford	MassDEP	Shi Chen	MassDEP
Lydia Olson	Mass Rivers Alliance	Stacy Johnson	MassDEP
Marcos Pareto	DPU	Stephen Estes-	MWRA
McKayla Olig	MassDEP	Smargiassi	
Mia Matteucci	DCR	Steven Korzen	EEA
Moussa Siri	WSCAC	Sula Watermulder	EEA
Nadia Madden	DCR	Tara Manno	MassDEP
Nihar Mohanty	MassDEP	Tessa Dassatti	DCR
Purvi Patel	EEA	Thomas Maguire	MassDEP
Rebecca Davis	MassDEP	Toni Stewart	DCR OWR
Sara Cohen	DCR OWR	Vanessa Curran	DCR OWR
Sarah Hughes	MassDEP	Viktoria Zoltay	DCR OWR
Sharon Lee	MassDEP	Viva Itemere	EEA

Rao called the meeting to order at 1:01 p.m.

Agenda Item #1: Welcome and Introductions

Rao introduced herself and announced that the meeting was being recorded for the purpose of meeting minutes and that all votes would be taken by roll call. She invited those who wish to speak during the meeting to indicate this in the chat window. Lastly, she requested attendees to put their name and affiliation in the chat.

Agenda Item #2: Executive Director's Report

Rao began the report by noting that Graham will be providing an update on the ongoing drought conditions later in the agenda. Rao described a recent drought press release, which included the declaration of a Level 2 – Significant Drought in the Connecticut River Valley, Northeast, and Central Regions. All three were previously at Level 3 – Critical Drought. The Western and Southeast Regions saw the most drastic improvements, as they are currently at a Level 1 – Mild Drought. The Cape Code and Islands Regions continue to remain at a Level 1 – Mild Drought. Rao noted that the groundwater within the Cape Cod Region has significantly decreased since last month and noted that there is typically a lag between precipitation and when that is reflected in the groundwater levels. The Drought Management Task Force had discussed this and decided to hold this region at a Level 1 – Mild Drought for the time being.

When drought conditions are at a Level 2 – Significant Drought or worse, a Drought Alert is typically issued. Rao described this alert, noting it serves as a method to directly engage with stakeholders such as municipalities, watershed groups, and the public. Rao noted that the next drought alert will be sent out by the end of the day.

Rao noted that an RFP has been posted for a Drought Resiliency and Water Efficiency grant. Patel provided an update on the grant, noting that Q&A sessions have been occurring. These sessions will be posted online and updated regularly as needed. Questions will be accepted until January 15th with an application submission deadline of January 31st. All submissions and questions can be directed to Patel. The links to the promotion page and Commbuys posting were put in the chat.

Rao noted entities who are awarded will hopefully have four months to complete their projects. Rao noted that funding for this grant program may continue in the next fiscal year, and the next RFP would hopefully be released earlier than it was this year to give those awarded more time to complete their projects.

Rao asked Commissioners to alter the agenda, adding the vote to approve the October 10, 2024 meeting minutes as the third agenda item; the meeting minutes were distributed to the WRC along with the meeting packet. There was unanimous approval among Commissioners for this addition to the agenda.

Agenda Item #3: Hydrologic Conditions and Drought Status

Rao introduced Graham to present the Hydrologic Conditions Report for December 2024.

- *Temperature*: Monthly average temperatures were near normal. According to the Northeast Regional Climate Center (NRCC), the Boston climate site had its 5th warmest year on record (since 1872), and the Worcester climate site had its warmest year (since 1892).
- *Precipitation*: December precipitation was normal to above normal. While the 1-month precipitation look-back has improved, the 3-month and 6-month look-backs are still showing deficits.
- *Snow Cover*: At the end of December there was no snow cover. There was a seasonal snow deficit ranging from two to twelve inches.
- *Streamflow*: December streamflow ranged from much below normal to normal. All Regions had at least two gages in the normal range, except for the Central Region where all gages were below normal. The Central Region is at Index Severity Level (ISL) 2 and the Connecticut River Valley (CTRV) and Northeast Regions at ISL 1. Streamflow improved during the month with the precipitation events.
- *Flooding*: The December 11th storm impacted much of New England because of heavy rainfall and snowmelt. It caused minor flooding on the Hoosic River in Massachusetts as well as reports in the news of urban flooding.
- *Groundwater*: December groundwater levels ranged from much below normal to above normal. The Central, Northeast, and Islands Regions are at ISL 1.
- *Lakes & Impoundments*: At the end of December, eight of the reported lake and impoundment levels were below their 30th percentile. Every Region except for Cape Cod had at least one lake or impoundment below normal. The Western, CTRV, and Southeast Regions are at ISL 1, and the Central and Northeast Regions are at ISL 2.
- *MA Drought status*: Rao gave an update of the MA Drought status during the Executive Director's report. The drought declaration issued January 8th improved conditions throughout much of the state. The Western and Southeast Regions went from Level 3 to Level 1, and the CTRV, Central, and Northeast Regions went from Level 3 to Level 2. The Cape Cod and Islands Regions remained at Level 1.
- *US Drought Monitor (USDM)*: At the end of December, the USDM showed areas of D2 (Severe Drought), D1 (Moderate Drought), and D0 (Abnormally Dry).
- *NOAA Climate Prediction Center outlooks*: The January outlook showed no strong signal for temperature and chances leaning for above-normal precipitation. The season outlook showed changes leaning for above-normal temperatures and no strong signal for

precipitation. Both the monthly and seasonal outlooks show drought remaining but improving in the central parts of the state with some areas of likely removal.

Agenda Item #4: Vote to approve October WRC meeting minutes

Rao invited motions to approve the meeting minutes for October 10, 2024.

V O T E	A motion was made by Ken Weismantel with a second by Duane LeVangie to approve the meeting minutes for October 10, 2024.
	The vote to approve was unanimous of those present.

Agenda Item #5: Presentation and Vote: Local Drought Management Plan Guidance

Rao introduced the agenda item and said if Commissioners are not ready this month to vote, that could take place next month. This document was presented at the last meeting and provided in the meeting packet. This should be considered as a working document, and a vote for its release would allow for communities to begin using it and providing their feedback. Rao also requested that the vote would allow for WRC staff to make minor edits and changes to provide more clarity. Rao then described the WRC and its function for any new attendees present.

Rao introduced Graham. This guidance was borne from a request for help setting drought triggers after the 2016 drought. A working group was set up which met in 2017/2018. The working group began the process and in 2022 a grant was received to hire a consultant to bring it over the finish line. Steering committee was composed of public water suppliers (PWS) and state agency staff. The goal of this document is to provide guidance for local PWS to develop robust and analytically grounded drought management plans (DMPs). The target audience is PWS, whether with surface water, groundwater, or a combination of sources. This guidance can be used by PWS to develop plans without the use of specialized tools, or to familiarize themselves with the drought planning process should they want to hire a consultant. The guidance is based on AWWA's M60 drought preparedness and response manual, as outlined in the Massachusetts DMP in Section 8. Two training sessions were held in June.

Graham walked through the different drought planning steps. The first step is to form a drought planning team, create a schedule, and establish coordination, cooperation, and communication plans. The second step is to forecast supply in relation to demand, which is a high-level planning exercise to develop reasonable estimates of potential water supply shortfalls. Step 3 is to assess methods for balancing supply and demand, and the guidebook presents a menu of demand reduction and supply augmentation methods, and the goal is to encourage proactive planning. The next step is to establish triggers and action levels, and the first part of that is to select the indicators, which could be rainfall or water levels. Then select the sources and establish the action levels, which can be an iterative process. Finally, create a monitoring plan.

Graham showed an example of step 4.3, using a groundwater-only system. The indicator was chosen first which in this case was static water levels for the primary well. The critical level was set as 5 feet above the pump screen during pumping. Historical data were plotted to see what drought levels would have been triggered in low demand and high demand years.

Graham showed another example from a combined system. The available groundwater data didn't show discernible trends, so the reservoir was chosen as the indicator. The critical level was set at the reservoir's unusable storage of 20 million gallons. When plotting the historical data, it showed that 2022, which was a drought year, was also a low demand year. This system has a drought plan which was successfully implemented. 2018 was a rainy year so presumably did not have any restrictions in place and was a higher demand year.

The next step is to develop a staged response, which can start with levels that AWWA suggests, but could end being more system-specific. The goal is to take the findings from step 2 and look at the step 3 actions to see what is realistically achievable in terms of water savings. Graham showed an example matrix which started with AWWA goals which projected a shortfall. The actions were assigned to the different levels according to Step 3. Next step is to adopt the DMP and implement it.

Additional resources are in the appendices and show the full analyses for examples and include links to additional tools and resources. Appendix C has best practices for developing a bathymetric survey. WRC staff are seeking a potential vote today, and to put out the working draft on the web while staff continue to refine the draft document and also develop a checklist for reviewing these local DMPs.

Rao asked if there were any questions or comments. Woods commented that she would like to spend more time looking at this to give more informed comments, but noticed mention of a drought surcharge and asked for an explanation. Cohen responded that a drought surcharge is a strategy that PWS could use to avoid budget shortfalls during droughts and incentivize conservation. These are not known to be used in MA yet but are used elsewhere in the country and PWSs could consider it. Woods added that the concept is good, to have a plan for when things go south, with measured responses and monitoring. Is there an adaptive management component? Carroll and Graham responded that yes, it's an iterative process, especially setting the triggers. A PWS can use best professional judgment, see how the plan works during a drought, then adjust as needed.

Woods noted that something similar was done in Scituate to help identify how stream flow requirements could be met. Data were analyzed to measure the reduction achieved by water bans, which wasn't as much as hoped for, but it did make a difference over time. The messaging got harder and the drought got worse, and restrictions did get more stringent. Rao said that some communities already have DMPs and others don't or aren't using anything as formal. This may provide some more clarity or a method to put thresholds together in a more systematic manner.

Cambareri asked about the trigger levels – it's his understanding that the USGS uses the 25th percentile to identify below normal. How do these percentages as shown compare? Graham responded that the percentages are system specific, and a trial-and-error approach may be needed to determine them. She showed in the example groundwater system, 25% below normal would end up below the critical level. Weismantel added that one needs to look at individual wells.

LeVangie noted this drought plan guidance does not require that PWS consider the requirements of their WMA registration or permit which are specific to their system. Separate from this, they may have conditions in their registration or permit related to drought. Items that DEP is including in WMA permits and registrations aren't necessarily included in the local DMPs.

Pederson added that what Graham provided are examples. A system may decide they have a different comfort level with the thresholds so the DMPs will be tailored to each system. There was discussion around questions like how to gauge what is available in a working well vs. a monitoring well. Systems will need to decide what their best indicators are. It could be the highest use well, days of supply, or tank levels. PWS will need to pick something to go with to get started but the plans will very much rely on the operator's understanding of their system and their risk tolerance. Graham responded to LeVangie and Pederson's comments by noting that different indicators can be selected but the focus of the examples is this planning process is for the extension of supply.

Weismantel commented that it's a very detailed and well written guidance document which makes it easier for people to comply if it's spelled out. Weismantel asked Pederson to comment on whether this is a workable document. Can a small water supplier write a plan without hiring a consultant?

Pederson responded that she was involved in this process and gave input along the way. A competent staff could work with this. What wasn't shown is examples of spreadsheets to support the plan and how to populate the spreadsheets. Perhaps not everyone could do it and some systems would need outside support. However, this provides some parameters to go by. Engineering firms are creating robust plans and some systems will probably continue with those more sophisticated drought plans. This guidance provides a good template for PWS to use. This document spells out the differences between this guidance, the MA DMP, and WMA requirements. Pederson added that she would prefer to delay the vote to give some Commissioners more time to review and would rather call it a working document than a draft. Rao noted it's called draft because the WRC has not yet voted to approve it but it will go out as a working document.

Pederson noted a word change she'd like to see. On page 4 in the section that describes the differences between the three different plans, in the second paragraph it says many PWS are required to enforce restrictions in their service area when the region in which they operate is in a state declared drought, or even sooner based on permit. Pederson suggested changing "enforce" to "implement". Pederson sent this to her members the day prior so hasn't gotten a lot of feedback yet, but did receive one email from someone who reviewed it and said they would like the WRC to be aware of the realities that these plans may call for a certain reduction in use which may not be achievable. It all depends on what public responds to, so it's not necessarily a failure on part of PWS if they can't achieve the desired reductions. MWWA is cognizant of what is guidance versus law and this is guidance that they don't want to see as a mandatory requirement. However, this is an excellent product for what the group has been trying to achieve.

Rao responded that was why it was important to include MWWA and PWSs on the steering committee to hear directly from suppliers as to what's needed and practical. LeVangie added

that WMA grants may potentially be available to fund the creation of DMPs using this guidance. Weismantel asked what resources WRC staff may have to assist PWSs. Rao and Graham mentioned the trainings that were given previously and maybe those can be offered again or posted on the web. Staff are also available to answer any questions. Rao asked if Commissioners are comfortable voting on this as a working document.

Cambareri thought it would be good to take more time to review more examples. Pederson asked if the spreadsheets could be shared with Cambareri for his review.

Rao said that based on feedback the vote will be postponed until the following month and she welcomes any comments in advance of the next meeting and vote in February.

The full presentation is available at: <https://www.mass.gov/doc/january-9-2025-working-draft-local-dmp-guidance/download>.

Agenda Item #6: Presentation: Climate Resilience Design Standards (CRDS) Tool: A resource for mainstreaming climate resilience in Massachusetts projects

Rao introduced the next presentation by giving some background on the Climate Resilience Design Standards tool. She reminded everyone that the tool used to be called RMAAT which included climate details and other parameters for consideration when developing a project. The tool can be used during the design of a project by showing climatic impacts and the vulnerability of a project based on multiple variables. The tool would help people see how the design would fare in the future and help project managers prepare designs with climate resilience. Rao remarked that it would be good for commissioners to get some insight into what the tool has since it is a topic that has such high interest, and because we know that climate and hydrology will continue to change. Rao then welcomed Caitlin Spence, an assistant climate scientist at EEA, to discuss the Climate Resilience Design Standards Tool (CRDS).

Spence thanked Rao for the excellent introduction then gave an overview of the presentation. Spence will give an overview of the Office of Climate Science and where it sits within EEA, highlight what the CRDS is, the kinds of recommendations the tool will provide, and the specific precipitation design standards in the tool.

Spence explained the Office of Climate Science was created in the summer/fall of 2023 and was inspired by the Resilient Mass Plan which had a goal of serving as an authoritative resource and providing subject matter expertise on statewide climate change data and models. It would also provide technical assistance and support in making sure that climate change projections are applied in a consistent way to different projects across state entities. Spence remarked that within the office, she is the assistant climate scientist focusing on non-ocean related hazards. Her counterpart, Margot Mansfield, focusses on coastal related hazards and does work with CZM and the Resilient Coasts Initiative. The director, Edwin Sumargo, is working on convening a climate science advisory panel, keeping the work plan on track, and steering the office in general.

Spence explained the CRDS tool, which was commissioned by the Resilient Massachusetts Action Team (RMAAT), an interagency group that steers resilience initiatives in Massachusetts. The tool was developed to provide a one stop place for anyone working on site specific projects in Massachusetts to screen for potential climate resiliency issues. The tool was designed so that

people who are not climate change experts can get a starting point for thinking about how to incorporate climate change considerations into a project concept or design.

Spence stated that the tool was originally made for state agencies to use in capital planning and that it is now being used in several state grant applications, such as the Municipal Vulnerability Preparedness action grants. Applicants are required to use the tool if they are doing a site-specific project rather than a more general conceptual project. Spence went on to say that the tool is also being considered as a requirement for certain steps in the new MEPA Resiliency Policy. She noted that regardless of whether it is a requirement, the CRDS tool is a great way to get a screening level assessment of climate change considerations for a project.

Spence then explained the four steps involved in using the CRDS tool. Step 1 includes core project information. Step 2 requires information about ecosystem service benefits the project may provide. In step 3 the user answers questions about what they already know about the site's exposure to natural hazards that might be exacerbated by climate change. In step 4 a user enters information about specific assets that are part of the project such as green infrastructure or roadways. Spence said that after the information is entered the tool screens the location against GIS datasets which include projections of future climate hazards and the tool also scores the project's sensitivity to those climate hazards based on information the user entered. Ratings are then provided for each asset, which includes physical exposure to hazards, as well as ratings on the sensitivity and criticality of these assets to those hazards. Finally, it provides a set of preliminary design recommendations.

Spence walked through those steps in more detail, describing how the user could add more detailed information about the project. She then discussed the preliminary exposure score provided by the tool. She showed an example of the ratings for physical exposure of a site to 3 kinds of flooding, extreme heat, and noted that exposure to sea level rise and storm surge are some of the risks highlighted by the tool. Spence demonstrated how to find additional detail on the factors that contributed to the score. A question was asked if the coastal flooding was 1% or 0.1% flood risk. Spence replied that the coastal flooding risk factor was the 1000-year flood or 0.1% flood being used in the tool. She then highlighted that in the example being used, the extreme heat section recommends planning for 2030, showing the different kinds of recommendations given. Spence continued to show the different examples of recommendations you may get from the tool covering extreme precipitation, future conditions, design elevations for flooding, extreme storms, and many more.

Spence continued, discussing the history of the tool being launched as a Beta version in April 2021. She said it has gone through several updates over time as additional projections and data sets have become available. She mentioned that the Climate and Hydrologic Risk Project that Rao and Zoltay are involved in has developed temperature and precipitation statistic projections that are now used in the tool and are also available through other Resilient Mass data resources. She announced that they have launched an update that includes temperature design values, additional coastal flood maps, and fixes some bugs that users identified over the years. Spence then showed links to the user guide and training videos for the tool, as well as links to data resources which underpin the tool.

Kluchman asked if this is being rolled out for interagency programs to use that have been using the RMAT tool, and if so, what is the timeline. Spence replied that the CRDS tool is sometimes called the RMAT tool, but they are encouraging people to call it CRDS. Rao confirmed that agencies who state they are using the RMAT tool are using the CRDS tool.

Woods asked if the information being collected through this database was available to regulatory agencies and how this might impact a user who might be thinking about a design that they did not want to commit to yet. Spence replied that once a project is submitted it is saved to the database that staff can then access, but if a person just wants to use the tool for their personal use they can just not click submit and it would not be saved in the database. The project will still be saved on the user end for continued use and updates. Spence explained that even if you do click submit there is nothing stopping you from creating an updated project submission. Woods then asked if someone was to run through it just to see how the tool works, does the delete button allow someone to delete their example project completely. Spence replied that she is not sure of whether there are any backup project files created so she will have to investigate that and connect with Woods when she finds out. Maguire added that no one from MassDEP sees any results of this tool. Rao confirmed that it is only the climate team that would see it.

Brolowski asked if the Resilient Mass model projections are custom-filtered through Bayesian statistics for MA and/or imported "as-is" from external platform statistical results, and if the supporting documentation for "projections" is available. Spence replied that the statistics are not based on Bayesian combination of multiple projections or of projection likelihood framework. Spence continued saying the projections are from the statistically downscaled climate projection data set and they have been further post-processed with a stochastic weather generator. She went on to say that the documentation on the projections are available on the site. Rao added that an interagency team including representatives from USGS, Cornell University, and Tufts University has been working for several years on the Climate Hydro Risk Project and developing these projections for us.

Pederson asked about potential risks associated with projects being designed using certain assumptions if climate hazards end up changing. Rao explained that because we talk in probabilities, there is a level of risk, and they compare it to what we have experienced in the past. Rao also said that they are not mandating anything, and it is still up to the municipality to understand the risk and make the decision in terms of what level of risk they are willing to take for their project. Spence added that the recommendations from the CRDS tool are provided as starting points and meant to be informative.

Spence then covered the climate projections for Massachusetts. She showed the climate projections dashboard explaining this as one way to access the temperature and precipitation projections for the state at the watershed or town level. Spence covered some of the resources and actions you can take in the dashboard, then remarked that they have entered phase 2 of the Climate Hydrologic Risk Project which will update statistics and provide new capabilities in the dashboard. She mentioned that it could be used for applying for FEMA grants for stormwater infrastructure design projects.

Rao thanked Spence for the presentation and asked Commissioners if there were any questions. Richards thanked Spence for a great presentation, remarking that it is a hugely important topic.

He commented that one concern he has is that people could make claims about certain fisheries habitat not existing in the future based on projections within the tool, but that he would have to spend more time exploring the tool before providing more thorough feedback. Spence noted that people can send thoughts and feedback to rmat@mass.gov.

Spence replied that she appreciated all the comments and feedback and encouraged everyone to continue exploring the tool. She provided her email for any additional thoughts or feedback. Rao, Spence and Brodowski remarked that the tool was very navigable and a great platform. Rao thanked the people from her team that helped with moving this project along, as well as Spence for the time she spent working on the tool and providing the update to the Commission. There were no other questions or comments.

Rao asked for a motion to adjourn.

V O T E	A motion was made by Weismantel with a second by Richards to adjourn the meeting. The roll-call vote to approve was unanimous of those present.
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Meeting adjourned, 3:08 pm.

Documents or Exhibits Used at Meeting:

1. WRC Meeting Minutes: October 10, 2024
2. Draft Local Drought Management Plan Guidance
 - a. MA Local DMP Guidance Document
 - b. MA Local DMP Guidance Appendix A
3. Notice of Public Hearings for the Lynnfield Center Water District's Interbasin Transfer Application to Obtain Water Supply from the Massachusetts Water Resources Authority
4. Letter dated December 9, 2024 from the WRC to MEPA regarding the Final Supplemental Environmental Impact Report (FSEIR) filed by Turquoise Southfield NR LLC (the Proponent) for the South Weymouth Naval Air Station (SWNAS) Redevelopment Project in Abington, Rockland, and Weymouth
5. Letter dated December 23, 2024 from the WRC to MEPA regarding the Final Environmental Impact Report Rollover (FEIR Rollover) for Former DPW Facility Demolition and Improvements Project in Longmeadow
6. Interbasin Transfer Act project status report, December 23, 2024
7. Hydrologic Conditions in Massachusetts, December, 2024 (available at <https://www.mass.gov/info-details/monthly-hydrologic-conditions>)

Compiled by: (WRC staff)

Agendas, minutes, and other documents are available on the web site of the Water Resources Commission at <https://www.mass.gov/water-resources-commission-meetings>. All other meeting documents are available by request to WRC staff at 10 Park Plaza, Suite 6620, Boston, MA 02116.