

## **MARINE FISHERIES ADVISORY COMMISSION**

**July 19, 2018**

**DFW Headquarters**

**Westborough, MA**

### **In attendance:**

*Marine Fisheries Advisory Commission:* Raymond Kane, Chairman; Michael Pierdinock, Vice-Chairman; Kalil Boghdan; Lou Williams; and Sooky Sawyer. Absent: Andrew Walsh, Charles Quinn; Tim Brady; and William Doyle

*Division of Marine Fisheries:* David Pierce, Director; Daniel McKiernan, Deputy Director; Michael Armstrong, Assistant Director; Kevin Creighton, CFO; Jared Silva; Nichola Meserve; Story Reed; Melanie Griffin; Sam Andrews; Chris Schillachi; and Nicole Perolt.

*Department of Fish and Game:* Ron Amidon, Commissioner; and Mary Lee King, Deputy Commissioner

*Massachusetts Environmental Police:* Lt. Matt Bass

*Members of the Public:* George Peterson and John Verissimo.

## **INTRODUCTIONS AND ANNOUNCEMENTS**

Chairman Ray Kane called the meeting to order and welcomed everyone.

## **REVIEW AND APPROVAL OF JULY 19, 2018 BUSINESS MEETING AGENDA**

Chairman Kane stated that the "Legislative Update" agenda item would be folded into the Deputy Commissioner's comments and future agendas should reflect this change. There were no objections to this action.

**Sooky Sawyer made a motion to approve the business meeting agenda. Michael Pierdinock seconded the motion. The July 19, 2018 agenda was approved unanimously.**

## **REVIEW AND APPROVAL OF JUNE 14, 2018 DRAFT BUSINESS MEETING MINUTES**

Vice-Chair Mike Pierdinock had several refinements to comments he had made at the June meeting. There were no objections to these changes.

**Mike Pierdinock made a motion to approve the June 14, 2018 business meeting minutes as amended. The motion was seconded by Sooky Sawyer. The minutes were approved unanimously.**

### **CHAIRMAN'S COMMENTS**

Chairman Kane stated that the New Bedford meeting would be held at DMF's New Bedford facility in order to provide Arthur DeCosta with the Belding Award. Director Pierce confirmed this for the Commission. David noted that the meeting would be held at DMF West, rather than DMF East where the MFAC met in May. He noted that DMF West was adjacent to DMF East and the facility could accommodate parking.

The Chairman stated that moving forward he would appreciate if MFAC members only spoke when called on by the Chair. He noted his frustration with cross-table and off-topic arguments at recent meetings, particularly in how this affected the ability for the MFAC to hold efficient meetings.

Lastly, the Chair thanked the Department and the Division for hosting "DFG Day" at the State House.

### **COMMISSIONER'S COMMENTS**

Commissioner Amidon's comments focused on several issues. First, he touched on DFG Day at the State House. The event was well attended and he was hopeful to host a similar event in 2019. He noted that DFG and DMF will work to better promote similar events allow for greater attendance from members of his agency's oversight commissions.

The Commissioner then went on to discuss the Deer Island fishing pier project. A public meeting was recently hosted by MWRA to hear concerns from Winthrop residents who objected to the project due to potential public safety and congestion issues. Despite these concerns, he felt there was also a lot of support from the project from various other stakeholders. He expected the project to move forward as scheduled despite these local concerns.

The Wellfleet-based Friends of Herring River obtained a grant through the Division of Ecological restoration to assist in a \$40-50M project. This has raised the visibility of efforts to use matching grants and donations for capital funding on ecological restoration and diadromous fisheries projects.

The Otis Civilian Advisory Council Meeting was held on July 14 in Buzzards Bay. The Council is working to develop a plan for Otis Air Force Base to host an outdoor exposition similar to the Big MOE in Sturbridge. He noted DFG and DMF's involvement in this planning.

Regarding ongoing inland and hunting and fishing issues, the Commissioner stated that the eastern deer archery season had been approved and published and that DFW's Fisheries and Wildlife Board had approved Mark Tisa as the agency's new Director.

Lastly, the Commissioner stated that he continued to get out into the field with DMF, including assisting with recent sea bass population work the agency was conducting in Buzzards Bay and Nantucket Sound.

### **DEPUTY COMMISSIONER'S COMMENTS**

Deputy Commissioner Mary Lee King stated that the state's operating budget was approved by the Legislature and was sent to the Governor. DMF fared well in this budget with its base budget being higher than the initial funding and all its earmarks being approved. She noted that the lobster processing bill was not included in the operating budget, but may be included in the Environmental Bond Bill.

The Environmental Bond Bill was sent to conference committee. She expected the bill would come out of the committee and be sent to the Governor prior to the July 31 deadline for this session. Moreover, she was confident that the marine fisheries fines and penalties modernization legislation will be implemented through the Environmental Bond Bill.

Ray Kane asked about the conference committee process. Mary Lee explained that the committee included members of the House and Senate and they focused on hashing out differences between the House and Senate versions of the bill. The fines and penalties legislation was the same in both versions, so presumably this would not be addressed in conference and would instead proceed to the Governor as is. The status quo language was supported by DMF and DFG.

Sooky Sawyer asked about the lobster processing bill. Mary Lee stated that the lobster processing bill was not included in the operating budget, but was embedded in the Environmental Bond Bill. However, there were differences in the House and Senate versions – with the House bill requiring a study by DMF be conducted. Her and Commissioner Amidon were confident that one version would move forward, but were uncertain as to which one it would be.

Sooky then asked if the legislation to eliminate the single trap rule in the waters of Gosnold would be included in the final Environmental Bond Bill. Mary Lee was uncertain. Sooky was disappointed that this legislation may not have gotten appropriate traction given the amount of attention whale issues get. Mary Lee felt that if the law was not amended this year, it would be addressed in 2019.

## **DIRECTOR'S COMMENTS**

Director Pierce began his comments by discussing state-waters groundfish management. He noted that DMF staff was working with NMFS to improve state-waters groundfish data collection and analysis. He expressed the need for more timely communication between NMFS and DMF on this issue.

Mike Pierdinock asked if NMFS was working with other states on this issue as well. Melanie Griffin was uncertain what work was being done with other states. However, MA was likely the focal point as MA is where nearly all the state-waters groundfish allocation is caught.

The ASMFC's Sea Herring Section held a call earlier in the week to discuss days out and landing limits for the Area 1A sea herring fishery in the inshore Gulf of Maine. The Section agreed to slightly modify the days-out and landing schedule to allow one additional fishing and landing day and to increase the weekly landing limit from 480,000 pounds to 640,000 pounds.

The NEFMC was also expected to address a buffer zone and control rule for herring. David stated that DMF supported some of the proposals being reviewed by the Council. However, he wanted to meet with MLA representatives to further discuss their concerns regarding bait availability. David speculated how the pending cuts to the 2019 herring quota, coupled with potential buffer zones could impact bait availability and drive effort in other bait fisheries (e.g., menhaden).

Sooky Sawyer noted that MA lobstermen are very reliant on the mid-water trawl fleet for bait. He expected the buffer zone restrictions would hurt the MA lobster fishery.

Ray Kane asked about the status of the 2018 menhaden quota. Nichola Meserve stated that about 40% of the states approximate 6 million pound quota had been taken and fishing activity had picked up in recent weeks. She also noted it was a banner year for menhaden catch in Maine.

Ray asked if MA lobstermen were getting access to the state's menhaden landings for bait. Sooky could not speak to this directly, but noted that there was not a bait shortage in MA. He also stated that the small mesh fishery in Ipswich Bay had just opened, which increases bait availability on the north shore.

Director Pierce noted that he and Chairman Kane provided a letter to Susanne Altenberger regarding her June request that the MFAC take a leadership role in fleet ecology. The letter noted that her request was outside of the legal scope of the MFAC and could not be accommodated.

The Director recently took a meeting with Jason Colby and Ron Powers. Jason and Ron represent recreational fishing interests, as Jason is a Boston Harbor charter boat captain and Ron is an avid angler and contributor to On the Water magazine. They

expressed their concerns regarding the status of winter flounder in the Gulf of Maine. In particular, they were concerned about how increasing the commercial state-waters trip limits in 2012 from 250 pounds to 500 pounds may be impacting abundance and recreational fishing in and around Boston harbor. They both supported, at a minimum, reducing the trip limit back to 250 pounds and preferred the state take action to move the fishery out of state waters. David expected this meeting would receive coverage in an upcoming meeting of On the Water.

David stated that DMF was already analyzing options to modify state-waters groundfish management to address concerns regarding MA's state-waters harvest of certain stocks exceeding the set-asides allocated to state-waters fisheries. He expected that these options would be ready for the MFAC to review at an early fall meeting. However, he did not expect that the options would meet what Jason and Ron were advocating.

Lou Williams took exception with Mr. Powers and Mr. Colby advocating to close the commercial fishery. Lou advocated for the state-waters fishery. He noted there are few participants in this fishery and they are highly regulated as to when and where they can fish. Moreover, they take blackbacks after they spawn and do not fish in Boston Harbor where the recreational fishery is occurring. He was extremely skeptical that this fleet could be causing damage to this stock.

Additionally, Lou was concerned that Mr. Colby and Mr. Powers may be comparing winter flounder fishing in Boston Harbor now to what it was 20-30 years ago. He noted that these conditions were heavily influenced by the sewage outfall and will not be reproduced due to the treatment plant. Lastly, Lou cited a 2016 video online where Mr. Colby stated that it was a banner year for winter flounder fishing in Boston Harbor.

Director Pierce stated that DMF's inshore trawl survey shows an increasing biomass of winter flounder in the Gulf of Maine. However, this is being driven by a couple of year classes that have not yet recruited into the fishery.

Mike Pierdinock stated that a number of recreational fishermen who target winter flounder in the Boston Harbor area reported that the size distribution is more truncated now that it has been in the past and a lot of undersized fish being caught. The need for additional measures should be assessed based on the most recent stock assessment and DMF's analysis of the state-waters groundfish fishery. The results will determine the need for more restricted measures to be implemented for the winter flounder to return to previous levels.

Mike Armstrong stated that he had previously discussed this issue with Jason Colby and they reviewed benthic survey data together. The benthic survey data shows that the Boston Harbor ecosystem is very healthy. However, flounder numbers are down from inflated historic levels and this may be due to changes in nutrients thanks to improvements made in sewage treatment.

The Director then moved on to discuss the ongoing review of MRIP, changes to how effort data is collected and how this may impact recreational fishing catch estimates moving forward. David expected staff would provide a presentation on this at an upcoming MFAC meeting.

Mike Pierdinock was concerned about the management implications of these new catch estimates. Chairman Kane noted that this would be addressed at the upcoming ASMFC meeting and DMF would likely be able to provide a more thorough analysis at a later date.

Lastly, David stated that DMF recently published its final version of the 2018 Saltwater Fishing Guide and its Newsletter.

### **LAW ENFORCEMENT COMMENTS**

Lt. Matthew Bass stated that Major Pat Moran was awarded the Humane Society's Law Enforcement Award for his efforts to combat poaching in MA.

He thanked the MFAC for their drafting of a letter to Secretary Beaton regarding enhancing MEP funding and enforcement presence. He felt the letter was well written and it was encouraging to the rank and file officers.

MEP were currently focused on striped bass poaching, particularly along the Cape Cod Canal. One issue of concern was compliance with the fin clipping rule for commercial fishermen fishing on non-commercial days. MEP were also working on shellfish aquaculture and trap gear issues as well.

Sooky Sawyer asked Lt. Bass if he could verify reports that MEP Col. McGinn was stepping down. Lt. Bass stated that he had not heard reports of Col. McGinn stepping down, but Lt. Col. Perrin was moving on. Sooky then asked how this position would be filled. Lt. Bass stated that it is typically filled at the discretion of the Colonel. There was support among MFAC members to see this position be filled by someone with experience working for MEP.

### **DISCUSSION ITEMS**

#### Draft Letter to Secretary Beaton Regarding MEP

Chairman Kane stated that a letter had been drafted on his behalf advocating to Secretary Beaton that funding for MEP be enhanced so that there may be greater marine fisheries enforcement in our coastal communities. He asked if the MFAC objected to the language drafted.

Mike Pierdinock offered several refinements to the language. There were no objections to these refinements.

There was consensus among MFAC members to send this letter to Secretary Beaton as amended by Mike Pierdinock. Chairman Kane then instructed DMF to make said amendments and send the letter to the Secretary under his signature.

#### August 2018 ASMFC Meeting

Deputy Director Dan McKiernan stated that DMF staff would review a number of important issues to be discussed at the upcoming ASMFC meeting.

#### *American Eel*

Dan McKiernan stated that the American Eel Board would review Draft Addendum V. The controversial items were ME's glass eel quota; glass eel aquaculture; and yellow eel quota triggers and allocations. Dan did not expect there would be support for changes in the glass eel fishery, but expected there would be a battle among the Mid-Atlantic states regarding the yellow eel quota. He also reminded the MFAC that they had weighed in on these issues in a comment letter.

Chairman Kane and Dan McKiernan discussed the nuances of the glass eel aquaculture rules. Dan opined that given the status of the resource the Atlantic states could not afford growth in the glass eel fishery, particularly as it will create further incentives to poach.

Mike Pierdinock asked if there were any comments received by the American Eel Board regarding an ESA designation. Dan stated that the comment were just sent along to board members and he had not yet reviewed them. However, an ESA listing would be outside of the scope of the Addendum and the jurisdiction of the ASMFC, so he did not expect there to be much discussion of such an action in the comment letters.

#### *Menhaden*

Nichola Meserve stated that the Menhaden Board only has one item before it and that is how to handle VA's non-compliance with implementing Amendment 3's lower Chesapeake Bay reduction fishery cap. The Board previously postponed a non-compliance finding to allow the VA legislature the opportunity to take action and instead wrote a letter to VA's Governor on the issue. She was hopeful that the VA delegation would be able to update the Board on where the 2018 landings stood in comparison to the lower cap level. VA had been under the proposed cap in recent years.

Nichola noted that the science to support the conservation need for the lower cap in the Chesapeake was not well documented in Amendment 3, which may make it difficult for ASMFC to pursue a non-compliance finding. There is concern that this would lead the Secretary of Commerce to not uphold the non-compliance finding, which may further erode the strength of the ASMFC.

Nichola and the Chairman discussed data confidentiality issues regarding the cap because Omega protein being the sole entity involved in this fishery. Nichola noted that the landings are made available to the ASMFC but are otherwise confidential.

Sooky, Nichola and Ray further discussed concerns regarding the Secretary of Commerce not upholding non-compliance findings and the weakening of the enforceability of the compact.

### *Black Sea Bass*

Nichola stated that the black sea bass working group was continuing to work to improve the recreational fisheries management approach and move forward with a regime that will create more consistent regulations across jurisdictions and from year-to-year. An interim approach will be required while the ultimate goal of an F-based management approach is developed and implemented. Under an F-based management approach changes to limits would be based on the assessment and not adjusted annually based on MRIP data, similar to what is currently used for striped bass and tautog. There are ongoing discussions with NMFS regarding how to develop such a management system under the current constraints of the MSA.

Director Pierce asked about how the continued presence of the 2011 year class in the fishery may affect harvest estimates in 2018. Nichola noted that the methods used to develop fishing limits in 2018 made assumptions about the 2011 year class aging out of the fishery. However, reports are that these fish remain abundant in our waters this year. Accordingly, harvest estimates may be higher than expected. However, she cautioned that MA catch may not be representative of the coast-wide catch because we are uniquely situated on their spawning grounds, which makes bigger fish available to us.

Mike Pierdinock shared his concerns about how higher than expected catch rates may influence rule making next year. He noted that this may be worsened by the use of the revised MRIP data. Lastly, he was concerned that coast-wide discard mortality numbers were being assigned to MA's fishery, which principally occurs in shallow waters where discard mortality is lower.

Mike P. was appreciative of the work DMF had done to slightly liberalize the state's black sea bass limits and address changes in geographic abundance. However, he opined that further cuts in this fishery based on MRIP data would create a credibility crisis given past restrictions and the abundance of fish available in MA.

Nichola responded to Mike P. She was hopeful that the stock assessment would be completed prior to the final recreational harvest limits being set for 2019. Survey and catch data suggests an above average 2015 year class, which when incorporated into the new assessment, will hopefully allow for at least status quo limits.

Nichola noted that the discard mortality rate currently used is standard across the recreational fishery. However, we see much lower rates of mortality in our fishery because it occurs in shallow water and higher rates for the fisheries that take place offshore later in the year. She suspected that these differences may will need to be incorporated into the assessment before working into the quota and regulation setting processes.



### *Striped Bass*

Mike Armstrong stated that the Striped Bass Board would be addressing two issues. First, Maryland was granted a 1" reduction to their minimum size contingent upon mandating the use of circle hooks. However, they have not yet implemented the circle hook requirement. The second issue is that ME's inland agency stopped regulating the recreational striped bass fishery, which created an enforcement void and a compliance issue that needs to be addressed.

### ASMFC/MAFMC Draft Bluefish Amendment Development

Nichola Meserve stated that the ASMFC and MAFMC were currently scoping the development of a draft amendment affecting bluefish allocations. The focus is on potentially changing the recreational-commercial allocation split and state-by-state commercial quota allocations. Based on the current timeline, rule changes coming out of this Amendment would be implemented for 2021.

Chairman Kane asked if the MFAC supported the drafting of a comment letter. The MFAC supported such an effort.

Nichola noted that as options had not yet been laid out, the letter should instead focus on what should be considered when drafting potential options.

Mike Pierdinock expressed concerns about adjusting the recreational-commercial allocations and how it may impact local fishing conditions. Moreover, he was concerned about how the revisions to MRIP methods may impact recreational harvest estimates. Accordingly, he favored status quo or a conservative approach to changing allocations. Mike noted that the Recreational Fishing Alliance and Stellwagen Bank Charter Boat Association had already submitted comments to that effect.

Lou Williams supported measures that would maintain flexibility in transfers in the commercial fishery. Historically, this fishery could be episodic in MA waters, particularly along the North Shore, with large abundances of fish showing up in certain years. Accordingly, he wanted to see MA fishermen be able to have quota available to them if such an event were to occur.

Sooky Sawyer stated that he would not want to see commercial limits constrained, particularly as forage are abundant in our waters.

Nichola noted she would draft a letter that encourages the ASMFC and MAFMC to consider the concerns expressed by the MFAC when developing the Amendment. She would circulate the draft comment letter for MFAC review before submitting it.

### Update on Recent Adjudicatory Hearings

Deputy Director Dan McKiernan stated that DMF was working to better publicize the enhancement of its administrative law program and its efforts to sanction recreational and commercial fishing permits in response to marine fishery violations. The most

recent DMF newsletter included an article on this, and Dan expected On the Water magazine would be covering it as well.

Dan then reviewed the various hearings held in the past year. These matters dealt with commercial and recreational striped bass and sea bass violations, lobster conservation violations, and contaminated shellfish violations. These matters are either resolved through settlement agreements or by a hearing in front of a magistrate. DMF typically prefers to negotiate settlement agreements and only proceed to hearing in the most egregious of cases.

Settlements, even for similar cases, vary based on the severity of the offense and the level of evidence. Moreover, the agency tends to seek more aggressive dispositions in matters where individuals have past violations or were not cooperative with enforcement officers.

With regards to the recent Captain Leroy party boat incident, DMF took action to immediately suspend the head boat permit. Immediately upon receipt of the suspension notice, the permit holder contacted DMF to discuss a settlement. DMF met with the permit holder and the vessel captain and discussed the incident and compliance issues at length. At the end of the meeting, the parties agreed to a settlement that resulted in a 3-year probationary period. During this probationary period, the head boat operation is subject to permit conditions that require it take a more active role in policing its patrons and improve methods for attributing catch to individual anglers.

Lt. Bass stated that MEP is very pleased with the adjudicatory hearing process and they believe it provides an efficient and effective enforcement tool and deterrent method.

Director Pierce complimented the work of DMF and MEP in these matters.

#### MFAC Sub-Committee on Improving Compliance in the For-Hire Sector

Deputy Director McKiernan provided some background on this topic. In 2014, the MFAC approved a regulation that held charter and head boat operators and permit holders responsible for the violations of their patrons. This was done in response to numerous incidents involving non-compliance on for-hire vessels, and particularly the practice of patrons abandoning their non-compliant catch. This was most prevalent in the spring sea bass and scup fishery.

Following the implementation of this rule the Viking Starship head boat was issued numerous citations for violations of conservation limits. In response, fines were levied against the permit holder and DMF took action to sanction the permit. DMF eventually reached a settlement agreement with the permit holder and through permit conditions they were required to take certain measures to improve compliance and compliance monitoring on their vessel.

DMF also committed to meet with other sea bass and scup head boat operators to more broadly discuss adopting operational compliance plans on a fleet wide basis. This meeting was held during the summer of 2017. Subsequently, a small number of vessels submitted voluntary compliance plans to be adopted as permit conditions.

Following the June 2018 Captain Leroy incident, there was renewed interest among DMF staff to revisit the idea of tightening regulations, including potentially mandating operational compliance plans in the party boat fleet. These plans would require operations address angler compliance, including but not limited to monitoring anglers, limiting container size for catch and attributing catch to anglers.

To further vet potential management solutions, DMF was suggesting a sub-committee of the MFAC be formed. This sub-committee could then convene during the late-summer or early fall with DMF staff members and MEP officers to analyze and vet options.

Chairman Kane asked DMF who they would want to serve on the sub-committee. Dan stated that he supported involving Mike Pierdinock and Tim Brady due to their experience in the for-hire fishery and Bill Doyle due to his experience working with the HACCP operational compliance plan.

Mike P. stated that he was happy to serve on this sub-committee and felt that the for-hire fleet would be receptive to reasonable rules aimed at leveling the playing field for lawful operators.

## **PRESENTATION ON KELP AQUACULTURE PROJECTS**

DMF's Aquaculture Specialist, Chris Schallchi, provided the MFAC with a brief presentation on the kelp aquaculture projects in MA. His presentation focused on two projects being developed off the south coast of Cape Cod in Nantucket Sound.

## **OTHER BUSINESS**

### MSA Reauthorization

Melanie Griffin provided a brief update on Congressional efforts to reauthorize the MSA. A bill has been passed through the House of Representatives. The Senate had drafted a separate bill, so they will now begin to work on reconciling the bills. When this has happened in the past, they have failed to reconcile the bills and reauthorize the law. Potential changes to this law through the reauthorization focus on rebuilding time periods; the meaning of overfished versus depleted; providing flexibility for alternative recreational fisheries management measures; improving definitions for catch share programs; and funding for federal industry based surveys and electronic monitoring.

## **COMMISSION MEMBER COMMENTS**

Lou Williams commented on state-waters groundfish management. He noted that with the existing effort levels and state-waters set asides, latent effort is a big concern among participants.

Melanie Griffin stated that this concern has been raised. However, DMF's preliminary analysis does not support the conclusion. The analysis has found that inter-annual changes in catch are driven more by the activity of active permit holders than latent effort becoming active. That said Director Pierce and Melanie both noted that latent effort becoming active may further reduce any buffer that may exist.

Mike Pierdinock stated that ICATT awarded funding to the University of Maine to conduct a tagging study on yellowfin tuna, big eye tuna and skipjacks. This study was critical to better understanding stock distribution, spawning grounds and overall abundance.

Ray recognized that summer meetings are difficult to attend and those thanked MFAC members who attended. He also encouraged MFAC members to tune into the ASMFC meeting via their web application.

## **PUBLIC COMMENTS**

John Verissimo stated his support for DMF's adjudicatory hearing process. He expressed interest in DMF potentially raffling off permits or permit endorsements that were revoked.

### **MEETING DOCUMENTS**

- July 19, 2018 MFAC Business Meeting Agenda
- June 14, 2018 Draft Business Meeting Minutes
- Draft Letter from MFAC to Secretary Beaton Regarding Enhancing Resources Available to MEP
- August 2018 ASMFC Preliminary Meeting Agenda
- Public Scoping and Information Document of Bluefish Allocation Amendment
- Memorandum on Recent Party Boat Violations and Future Modifications to For-Hire Regulations
- Letter from Ron Powers to Director Pierce Regarding the Status of Boston Harbor Winter Flounder
- Letter from Director Pierce and Chairman Kane to Susanna Altenburger Regarding Address Fleet Ecology Concerns Through the MFAC

### **FUTURE MEETINGS**

**9AM**

**September 13, 2018**

**DMF West**

**706 S. Rodney French Blvd.**

**New Bedford, MA**

**9AM**

**October 11, 2018**

**Division of Fish and Wildlife Field HQ**

**1 Rabbit Hill Road**

**Westborough, MA**

**9AM**

**November 8, 2018**

**Division of Fish and Wildlife Field HQ**

**1 Rabbit Hill Road**

**Westborough, MA**

**9AM**

**December 13, 2018**

**Division of Fish and Wildlife Field HQ**

**1 Rabbit Hill Road**

**Westborough, MA**