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July 18, 2008

Secretary Ian Bowles  
Executive Office of Energy & Environmental Affairs  
Attn: MEPA Office  
100 Cambridge Street, Suite 900  
Boston, MA 02114

**Subject: Supplemental Submittal to Environmental Notification Form (ENF) for  
Flood Mitigation Facilities for the Peabody Square Area  
EOEEA # 14251**

Dear Secretary Bowles:

On behalf of our client, the City of Peabody, Metcalf & Eddy (M&E) respectfully submits the enclosed supplemental information related to the subject project. The purpose of this submittal is to: 1) present additional information regarding the severability of Projects 1 and 2 from Project 3; 2) request MEPA review of Projects 1 and 2 only at this time; and 3) respond to comments relevant to Projects 1 and 2 that were raised by participants at the MEPA site meeting held on June 4, 2008 with Mr. William Gage of your staff.

**Severability of Projects 1 and 2 from Project 3**

As noted in the subject ENF, the City's overall flood mitigation plan for Peabody Square is comprised of three distinct projects: Project 1 (Goldthwaite Brook Culverts), Project 2 (North River Widening), and Project 3 (U.S. Army Corps of Engineers (ACOE) North River Widening). The City is responsible for the implementation of Projects 1 and 2, while the ACOE is responsible for Project 3, which was initiated under Section 205 of the 1948 Flood Control Act (PL 80-858), as amended. While the ultimate objective is to have all three projects implemented, the projects are severable. Projects 1 and 2 can be implemented without Project 3 to provide significant flood mitigation benefits for Peabody Square, while not adversely impacting flood conditions during significant storm events downstream in Salem.

As described in the ENF and presented in the Preliminary Design Report for Flood Mitigation Facilities for Peabody Square Area dated April 2008, hereafter referred to as the "PDR", using a hydraulic model, the performance of the recommended improvements was assessed based on the 50-year, 24-hour storm and the May 2006 flood. The hydraulic model developed for the PDR includes the entire watershed and accounts for hydrologic and hydraulic processes, including tidal conditions. It also incorporates extensive field data collected during the PDR effort and was calibrated to flow data collected at four locations. Table 1 presents a summary of the model results.

The recommended improvements for Projects 1, 2, and 3 (Run 4 in Table 1) are predicted to eliminate flooding during the 50-year, 24-hour storm in the Peabody Square area and should not cause adverse impacts in Salem. Constructing Projects 1 and 2 before Project 3 (Run 9 in Table 1) will result in continued flooding at Howley Street in Peabody for the 50-year, 24-hour

**TABLE 1. SUMMARY OF PEAK HYDRAULIC GRADE FOR BASELINE CONDITION, RECOMMENDED IMPROVEMENTS PROJECTS 1, 2, AND 3 (RUN 4) AND RECOMMENDED IMPROVEMENTS FOR PROJECTS 1 AND 2 (RUN 9) FOR 50-YEAR, 24-HOUR STORM AND MAY 2006 FLOOD**

Location	Model Node	City	Flood Threshold Elevation (feet) <sup>(2)</sup>	Baseline (Existing) Conditions		Run 4: Recommended Improvements (Projects 1, 2, 3)		Run 9: Recommended <sup>(1)</sup> Improvements Projects 1 and 2 Only)	
				Peak Elevation 50-year Storm (feet)	Peak Elevation May-2006 Flood (feet)	Peak Elevation 50-year Storm (feet)	Peak Elevation May-2006 Flood (feet)	Peak Elevation 50-year Storm (feet)	Peak Elevation May-2006 Flood (feet)
Goldthwaite Brook at Foster Street	Gold05945	Peabody	24.1	27.07	27.18	23.86	23.89	23.84	23.81
Goldthwaite Brook at Oak Street	Gold04868	Peabody	21	25.24	25.26	18.35	18.36	18.34	18.34
Peabody Square near Courthouse	Nor03643	Peabody	21.7	23.4	23.37	18.6	16.5	19.17	16.76
North River 100-ft East of Wallis Street	Nor02060	Peabody	13.5	15.83	15.78	11.48	11.41	13.25	12.95
North River at Caller Street	Nor01214	Peabody	13.3	14.7	14.59	10.94	10.66	13.2	12.83
North River at Howley Street	Nor00370	Peabody	10.4	12.85	12.66	10.17	9.94	12.9	12.54
Railroad Bridge Approximately 550 ft. Upstream of Grove St.	NorS04600	Salem	9.2	8.95	8.6	7.09	6.95	9.16	8.67
Grove Street	NorS03958	Salem	10.1	7.88	7.73	6.87	7.08	8.06	7.69
Flint Street	NorS02400	Salem	9.4	5.87	6.15	5.94	6.72	5.83	6.14
Upstream Side of North Street	NorS00200	Salem	8.1	5.69	5.93	5.7	6.34	5.67	5.92
Downstream Side of North Street	NorS00000	Salem	9	5.45	5.64	5.45	5.94	5.45	5.64

(1) Includes the reach between Strongwater Brook and Howley Street

(2) The flood threshold is the elevation at critical locations, above which flooding occurs.

\* Numbers in red indicate levels above flood threshold elevation.

storm, and the May 2006 flood, although the peak flood elevations would actually decrease for the May 2006 flood level and increase less than 1 inch for the 50-year storm. Since implementing Projects 1 and 2 without Project 3 will significantly reduce flooding in Peabody Square without substantially increasing flooding in downstream Peabody areas, Projects 1 and 2 have benefit even without Project 3.

In Salem, nominal increases in the water elevation of the North River at Grove Street and the Upstream Railroad Bridge are predicted for the 50-year storm if Projects 1 and 2 are constructed before Project 3; however, these elevations would still be below the flood threshold at the locations studied in Salem during the 50-year, 24-hour storm. Therefore, implementing Projects 1 and 2 will have benefits for relieving most flooding in Peabody and will not have adverse flooding impacts downstream in Salem.

It is important to note that the portion of the North River downstream of Project 2 (downstream of Howley Street) in which peak flows will increase slightly is tidally influenced. This affected area is located in land subject to coastal storm flowage (as defined in 310 CMR 10.04), and stormwater discharge is to a wetland subject to coastal flooding. Therefore, the project would comply with Standard 2 of the Massachusetts Stormwater Management Standards, which addresses post-development peak discharge rates. Additional information regarding flow rates and velocity downstream of Project 2 following implementation of Projects 1 and 2 only as compared to existing conditions is provided in the response to Comment 3 below.

### **Request for MEPA Review of Projects 1 and 2 Only**

The timeline for implementation of Project 3 is very preliminary, and, while the City remains optimistic, there is no guarantee that federal funding will ultimately be appropriated to fund construction of Project 3. Whether or not Project 3 is constructed in the future, implementation of Projects 1 and 2 is critical to provide desperately needed flood relief for the Peabody Square area. While project descriptions and estimated impacts for all three projects were presented in the ENF, the City now requests that MEPA review only be conducted for Projects 1 and 2 at this time. Further delay in implementation of Projects 1 and 2 would result in an undue hardship for the City by keeping the downtown area in danger of significant flooding and potential harm to residents and property. The City has secured state and federal funding for Projects 1 and 2. These projects must be initiated by September 1, 2008 to meet a December 31, 2008 deadline for a \$2.0 million Economic Stimulus Bill grant or the funding will be jeopardized.

Based on the information presented above regarding the severability of Projects 1 and 2 from Project 3, and the fact that Project 3 is not a City action, the City believes this request is not in violation of the segmentation clause in the MEPA regulations (301 CMR 11.01(c)). Therefore, the City respectfully requests that comments only be submitted and considered for Projects 1 and 2, and that the Secretary's Certificate only be issued for Projects 1 and 2.

When Project 3 moves forward, the ACOE Project Manager for Project 3 has stated that they will hold a meeting with all state and federal permitting agencies and will apply for necessary permits and approvals, including compliance with MEPA review. Any outstanding questions for Project 3 will be addressed at that time when the project and anticipated impacts have been further developed and better defined.

## Response to Comments

Comments received at the MEPA site meeting that are relevant to Projects 1 and 2 are presented below (see underlined text) and are followed by the City's responses.

1. Can stream flow be maintained in the daylighted section of Goldthwaite Brook (parallel to Foster Street) in order to minimize permanent impacts to this waterway?

Response:

As described in the ENF and presented in the PDR, the tributary drainage of the existing Goldthwaite Brook culvert will be modified for Project 1. Approximately 140 feet of the existing subterranean culvert along Foster Street from Oak Street toward Franklin Street will be removed to allow construction of the new culverts. Approximately 70 feet southwest of the intersection of Franklin Street with Foster Street, a bend redirects the existing culvert away from Foster Street in a westerly direction toward Franklin Street. At the approximate location of the bend, the existing culvert is proposed to be sealed with a brick or concrete masonry wall, and this location will become the upstream terminus of the existing culvert.

From the upstream terminus toward downstream, the flow from the existing Goldthwaite Brook culvert will be diverted into the proposed twin culverts and conveyed directly to the upstream end of the daylighted section of the North River (approximately 100 feet east of Wallis Street). The existing culvert will convey only local drainage until its subterranean connection with Proctor Brook.

This modification will result in permanent impacts to the land under water and inland bank along approximately 400 feet of open channel for the existing culvert. The affected resource areas in this drainage channel are comprised of artificial impervious material. Thus, these resource areas are likely to be significant to flood control and storm damage prevention only, and provide minimal benefit to the remaining interests of the Massachusetts Wetlands Protection Act.

This aspect of Project 1 was revisited following the MEPA site meeting to address this comment and determine if some flow can be maintained and these impacts could be minimized or avoided altogether. To help maintain some flow in the existing culvert beginning at the upstream terminus, a small pipe may be extended from the proposed westerly 4-foot high by 10-foot wide culvert through the proposed upstream plug of the existing culvert. The pipe would match inverts of each conduit. A drain manhole with a stop log may also be constructed on top of the proposed pipe to allow flow cutoff if necessary to minimize flow in the existing culvert during large storm events. During normal flow conditions, the pipe would allow a portion of the base flow and stormwater flow to be diverted to the existing culvert.

Design details, including desired flow rates in the existing channel and the sizing of the proposed connecting pipe would be determined during the final design phase of Project 1.

2. Will widening the North River canal increase the channel's width/depth ratio and negatively affect low flow conditions? Could this change also decrease the sediment transport capacity of the channel resulting in subsequent aggradation of sediment in the channel?

Response:

The North River canal upstream of Howley Street has an existing width that varies between approximately 11 to 22 feet. The existing average base flow depth for this reach of the North River is approximately 1.1 feet, resulting in an average width/depth ratio of approximately 17:1 during base flow conditions. As described in the ENF and presented in the PDR, under Project 2, this reach of the North River canal is proposed to be widened to a consistent width of 38 feet, using the vertical south wall alternative. The widened channel bottom in the PDR is proposed to be level/flat. The new average base flow depth for this reach would be approximately 0.5 feet, resulting in a new average width/depth ratio of approximately 76:1.

In order to minimize changes to the width/depth ratio of the North River and address associated concerns raised in the comment, the City has evaluated alternative designs for channel widening. An alternative channel design consisting of a sloped channel was reviewed for the Project 2 area. A typical cross section of the sloped channel is presented in Figure 1. A slope of 10 horizontal to 1 vertical was chosen to minimize erosion. Hydraulic modeling was performed to determine flow depth and velocity during key periods including base flow (dry period between storms), 3-month storm, and 50-year storm. The resulting average width/depth ratio for base flow is approximately 20:1, which is very close to the existing condition of 17:1. In addition, the base flow velocities for the sloped alternative are very similar to the existing base flow velocities. Thus, the sloped channel alternative would result in a narrower channel during base flow with increased velocity as compared to the flat channel, which should limit sediment buildup and benefit water quality and dissolved oxygen. Various features of the proposed configuration of the sloped channel may be improved as part of the final design of Project 2.

In most locations of the North River, currently the base flow extends across the entire riverbed, with only small pockets of accumulated sediment that extend above the waterline and contain plant species. Due to the proposed increase in width of the North River, the base flow of the river is not anticipated to cover the entire riverbed in the future under the sloped channel alternative. As shown on Figure 1, water surface elevation under the base flow conditions will extend approximately half of the distance along the sloped channel sides, and the 3-month flow surface water elevation extends approximately to the vertical wall on each side of the channel.

To address the linear sections of the riverbed along both the northern and southern walls where flow is not anticipated to be present under base flow conditions, the City has evaluated alternatives for stabilizing these areas and attempting to improve their function as riparian habitat. Although the primary functions of the North River that are intended to be improved as part of this project include its capability to provide flood control and storm damage prevention, the City acknowledges the other functions of this area such as the protection of fisheries and protection of wildlife habitat. To address and improve these functions within the framework of this project, a portion of the sloped channel sides will be re-vegetated from the toe of the wall to the surface water elevation of the base flow, a distance of approximately 9 feet for each side. At this time, an area of approximately 6,300

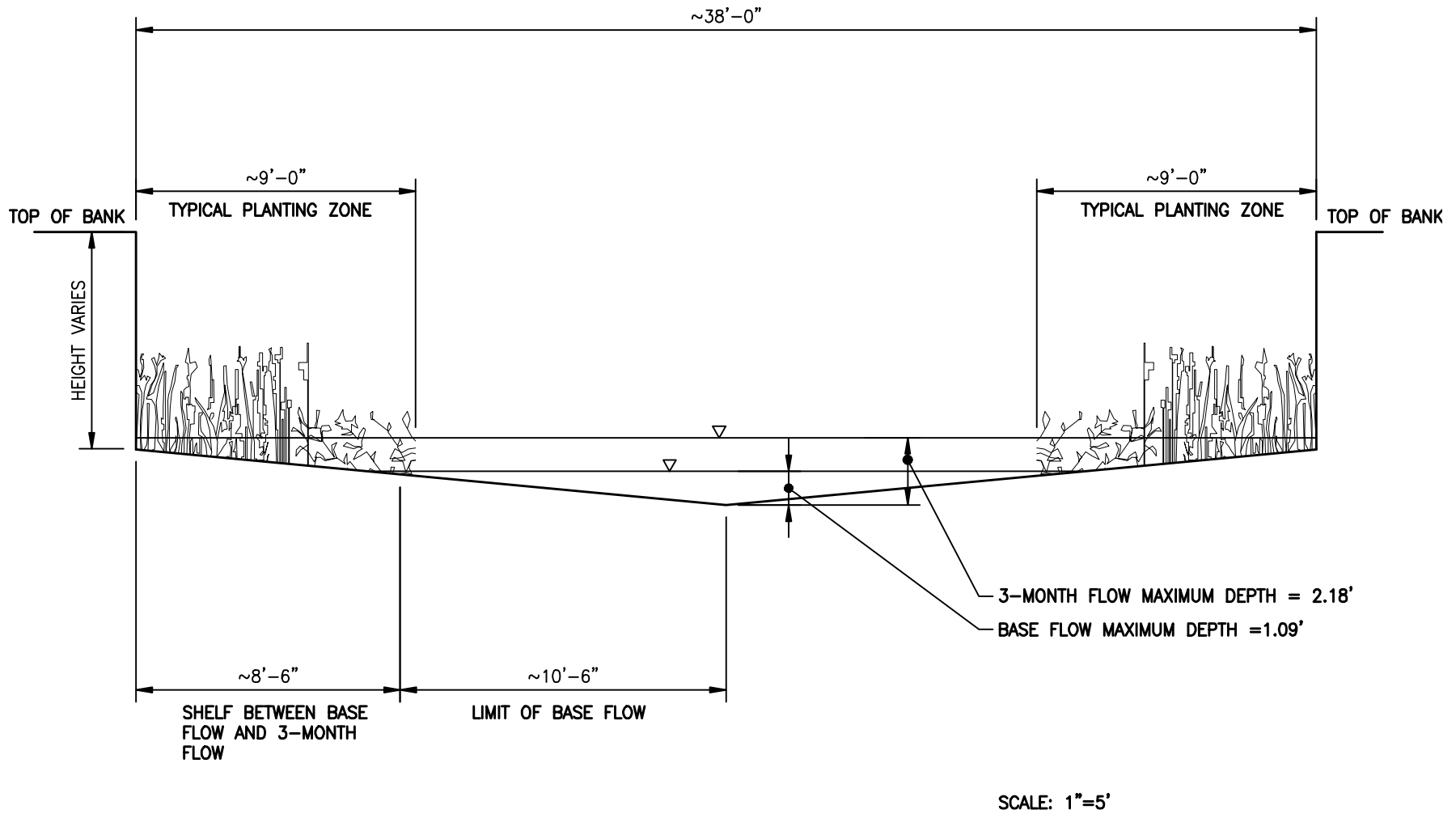
square feet is proposed to be initially planted. The City will continue to pursue funding to add additional plantings on an annual basis.

The proposed enhancement calls for approximately 700 linear feet of the stream perimeter to be planted with wetland plant species suitable for the varying water levels planned for North River. This would represent approximately 22 percent of the entire Project 2 stream perimeter (approximately 3,200 feet). The planting areas will be located on both sides of the river at the upstream and downstream reaches of the widened section. Each of the four plots will be approximately 175 feet long by 9 feet wide, representing the area between the surface water elevation of the projected base flow (where water will be consistently flowing) and the retaining walls on either side. Flows during the 3-month storm event are anticipated to extend above the base of the retaining wall on either side of the river.

The planting zone will be prepared with the placement of suitable subsoil and topped with loam. The area will be seeded with a wetland seed mix intended to provide long-term stabilization of soils in moist to wet areas. An erosion control blanket will be placed over the seeded area and fastened securely. To accelerate the areal coverage of wetland plants and reduce the incidence of invasive species in these planting zones, herbaceous plantings will accompany the wetland seed mix. The plant species identified in Table 2 are representative of the species proposed to be installed in the planting zone depicted on Figure 1. No woody plantings are proposed to be planted to avoid adversely impacting the integrity of the adjoining retaining walls. Final planting plans would be developed during the final design stage based on suitability and commercial availability. Overall, creation of this riparian habitat will improve river's biological and physical conditions by providing sediment control/removal, thereby improving water quality, and wildlife habitat.

**TABLE 2. REPRESENTATIVE PLANTING PLAN FOR THE VEGETATED AREAS**

<b>Common Name</b>	<b>Scientific Name</b>
Riverbank Wild Rye	<i>Elymus riparius</i>
Virginia Wild Rye	<i>Elymus virginicus</i>
Blue Flag Iris	<i>Iris versicolor</i>
Soft Rush	<i>Juncus effusus</i>
Monkey-flower	<i>Mimulus ringens</i>
Hard-stem Bulrush	<i>Schoenoplectus (Scirpus) acutus</i>
Green Bulrush	<i>Scirpus atrovirens</i>
Woolgrass	<i>Scirpus cyperinus</i>



**FIGURE 1**  
**TYPICAL CROSS-SECTION OF NORTH RIVER WITH SLOPED CHANNEL**

3. The portion of the North River within the Project 3 area contains sensitive rainbow smelt spawning habitat. Will implementation of Projects 1 and 2 impact this habitat by affecting flows/velocities?

Response:

In order to address this comment, additional hydraulic modeling was performed to determine flow rates and velocity for base flow and the 3-month storm conditions downstream of the limits of Project 2 (downstream of Howley Street) under existing conditions and following implementation of Projects 1 and 2 without Project 3. Based on the results of the model, flow rates and velocity downstream of Howley Street will be the same for Projects 1 and 2 without Project 3 as compared to existing conditions under base flow conditions. For the 3-month storm, flow rates will slightly increase while velocity will be the same (see Table 3).

**TABLE 3. PEAK FLOW RATES AND VELOCITY FOR NORTH RIVER DOWNSTREAM OF HOWLEY STREET<sup>(1)</sup>**

North River Condition	Base Flow		3-Month Storm	
	Flow (cfs)	Velocity (ft/sec)	Flow (cfs)	Velocity (ft/sec)
Existing Channel without Projects 1 and 2	16	0.9	108	1.1
Existing Channel with Implementation of Projects 1 and 2 <sup>(2)</sup>	16	0.9	110	1.1

(1) Information presented is for Model Node Nor00317 (located between Howley Street and Peabody/Salem border).

(2) Reflects implementation of the sloped channel alternative for Project 2.

Based on the information presented above, flow rates and velocity downstream of Project 2 will be approximately the same following implementation of Projects 1 and 2 versus existing conditions. Thus, habitat related to flow and velocity should not be affected by implementation of the projects. Consultation with the Massachusetts Division of Marine Fisheries will continue during the permitting phases of the project to identify required efforts to avoid and minimize impacts to fisheries resources.

4. How will dredged materials from the North River canal be handled and disposed?

Response:

As discussed in the ENF and presented in the PDR, dredging an average of one foot of sediment and debris from the bottom of the existing North River canal is proposed for Project 2 to facilitate a uniform channel slope between the upper and lower ends of the North River widening. A combined geotechnical/environmental subsurface investigation is proposed to be conducted during final design of Project 2. As part of this program, sediment samples will be collected from the North River channel bed for grain size and chemical analyses to meet the requirements of the 401 Water Quality Certification application for Project 2. Although characterization sampling and testing must still be performed, all of this material is currently assumed to be contaminated (considering the historic industrial use of

adjacent land) and therefore may require disposal at an appropriately approved facility. Prior to disposal, the material must be dewatered. This will require a staging area with gravel sub-base and liner for draining and a temporary treatment system which may include a settling tank and bag filters and/or carbon filtration for treatment of the drained water prior to discharge back into the river. This process will be conducted in accordance with the requirements of the National Pollution Discharge Elimination System (NPDES) Remediation General Permit (RGP) that will be obtained for the project. It is also possible that additional treatment may be needed for metals removal to meet RGP effluent limits. The material removed from the river channel will be spread out over the staging area and allowed to dry before hauling away for disposal. The drained water will be collected and sent through the temporary treatment system.

5. What alternatives have been considered to manage/reduce stormwater flows?

Response:

As noted in the ENF, an extensive evaluation was performed in the PDR of using upstream storage to attenuate peak flows and mitigate downstream flooding in lieu of the drainage improvements proposed as Projects 1, 2, and 3. Storage options were evaluated using the hydraulic model for the following locations: Cedar Pond, Upper Flume Pond, Lower Flume Pond, Sydney Pond, wetland upstream of Downing Road, detention pond at Northshore Mall, and Crowninshield Pond.

The model results indicate that utilizing upstream storage is not a feasible alternative to allow for either an elimination or downsizing of the components contained in Projects 1, 2 and 3 for the 50 year, 24-hour storm. However, some upstream storage areas may provide localized flood relief during smaller storms. The City is evaluating localized benefits for these areas under separate studies.

The upstream storage alternative has now been evaluated four times, twice by the Army Corps of Engineers (in 1969 and 1978), by Camp, Dresser & McKee in 1988, and now by M&E as part of the PDR. All four studies contain the unanimous conclusion that upstream storage will not significantly decrease peak flows and runoff causing downtown flooding.

Under an effort separate from the proposed Peabody Square flood mitigation projects, the City is conducting a city-wide structural and non-structural Best Management Practices (BMP) program to identify ways of managing stormwater that could provide both localized and city-wide benefits. As part of this effort, the City recently prepared the Strongwater Brook Improvements and Flood Control Master Plan. The Master Plan provides an initial assessment of opportunities for implementing Low Impact Development (LID) BMPs within a portion of the Strongwater Brook Watershed in the City of Peabody. The City is currently seeking funding through the 319 Nonpoint Source Pollution Grants Program to implement some of the recommendations contained in this Master Plan.

The City has also recently completed GIS mapping upgrades for 100 percent mapping of Peabody's 8,000 storm drain structures. This mapping will improve the maintenance of the City's stormwater system.

If you have any questions or need additional information, please contact me at 781-224-6222 or via email at aaron.weieneth@m-e.aecom.com.

Very truly yours,  
METCALF & EDDY, INC.

A handwritten signature in blue ink, appearing to read "Aaron Weieneth". The signature is fluid and cursive, with a long horizontal flourish extending to the right.

Aaron Weieneth, AICP  
Project Environmental Planner

Enclosures

Cc: William Gage, MEPA Office  
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