



zTo: Ms. Jody Kablack  
Planning Board and Zoning Board of  
Appeals  
Town of Sudbury  
278 Old Sudbury Road  
Sudbury, MA 01776

Date: April 5, 2016

Memorandum

Project #: 13125.00

From: Karen F. Staffier, P.E.

Re: 526 & 528 Boston Post Road Redevelopment  
**Response to Stormwater Master Plan Peer Review Comment  
Letter**

Cc: Janet Bernardo, Horsley Witten  
Deborah Dineen, Sudbury Conservation  
Fred King, Schofield Brothers  
Steve Senna, National Development  
Dave Gillespie, AvalonBay  
Meredith Avery, VHB

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We appreciate Horsley & Whitten's thoughtful review of the Stormwater Master Plan, and in working collaboratively with us throughout the process. On behalf of BPR Sudbury Development LLC, we respectfully offer the following responses to the comment letter prepared by Janet Bernardo of Horsley & Whitten dated March 22, 2016 regarding the Stormwater Master Plan. Each comment is noted below in italics followed by VHB's response in bold text. Accompanying this memorandum is an updated Stormwater Master Plan dated April, 2016 reflecting the responses below, which will serve as the final SMP for the project moving forward.

- Standard 1: No new stormwater conveyances (e.g. outfalls) may discharge untreated stormwater directly to or cause erosion in wetlands or waters of the Commonwealth. The Applicant has stated that untreated stormwater discharging to or causing erosion in wetlands or water bodies will not be allowed in connection with this project. A review of the preliminary Master Plan suggests that at a minimum prior to discharging to the central retention basin (Wetland 3) stormwater will be treated by deep sump catch basins and forebays and that no new outfalls will be created. However the potential discharge into the various other wetland areas is not clear. It appears that there are existing discharge points into Wetland 1, Wetland 2, Wetland 4, and Wetland 6. HW recommends that the final stormwater design for each phase of development confirm that an appropriate treatment train is being provided prior to each discharge point and that the velocities at the outfalls be provided to verify that erosion will not occur within any on-site wetland resource area.*

**As part of the final stormwater design for each phase of development, the applicant agrees to confirm that the appropriate treatment train is being provided prior to each discharge to a wetland and to provide documentation related to the velocities and the potential for erosion at the outfalls.**

2. *Standard 2: Stormwater management systems shall be designed so that post-development peak discharge rates do not exceed pre-development peak discharge rates: The Applicant has provided both the preliminary Existing and the Proposed Drainage Conditions watershed maps and HydroCAD modeling analysis for the various phases of development. From a preliminary perspective the watershed areas, times of concentration ( $T_c$ ), and curve numbers (CN) appear appropriate for the various catchment areas and the post-development peak discharge rates and volumes do not exceed the pre-development peak discharge rates. HW recommends that the preliminary Master Plan calculations be included as a reference with the design of each phase to verify that the design features such as the amount of impervious area and the sizing of any proposed best management practices (BMPs) are consistent with the approved Master Plan.*

**Agreed. The Preliminary Master Plan Calculations will be provided as a reference in support of the submission of each of the future phases with documentation of how each phase (and the approved phases cumulatively) are consistent with the Master Plan. The Master Plan hydrologic model may be updated, if necessary, to reflect the final design condition of certain phases of the project. As requested, charts will be provided in future phases to show how the impervious areas relate to the Preliminary Master Plan (or updated Preliminary Master Plan, as applicable), as well as the BMP sizing and selection.**

3. *Standard 3 requires that the annual recharge from post-development shall approximate annual recharge from pre-development conditions.*
  - a) *The Applicant has noted that the impervious area of the entire site will be reduced under the proposed layout and therefore the recharge criteria are met. The Applicant has provided Table 3 under Proposed Drainage Conditions that will be used as a comparison to verify that each phase of construction is consistent with the Master Plan. Moving forward with each phase of development, the Applicant will be held to the maximum amount of impervious area allowed within each phase as listed in Table 3. HW recommends that the Applicant include in the Master Plan a list of potential recharge practices that are approvable by the Town of Sudbury as well as acceptable BMPs and an anticipated volume to recharge based on proposed impervious area.*

**As noted in the response to #2 above, the applicant agrees to provide documentation with each phase regarding the maximum amount of proposed conditions impervious area presented in Table 3 of the Master Plan. If the final design of future phases results in a change in distribution of impervious area from what is presented in in Table 3, an updated hydrologic analysis will be provided to document and support the change. The applicant agrees that the total proposed conditions impervious area on the site will be more than 5% greater than the total listed in Table 3.**

**The Master Plan will be revised to include the following as potential recharge practices. Additional BMPs not listed may be incorporated into the final design of each phase:**

- Rain Gardens
- Grass Swales/Vegetated Channel
- Bioretention Areas
- Dry Wells/Leaching Chambers
- Subsurface infiltration systems
- Infiltration basins

b) The Applicant has provided Recharge Calculations in the Master Plan; however it is not clear where the additional 2.2 acres of HSG A is located on the site.

**The off-site portion of subcatchment S1C in the Existing Conditions HydroCAD model was inadvertently identified as HSG B, instead of HSG A. This was not replicated in the Proposed Conditions HydroCAD model, resulting in the reported “additional 2.2 acres of HSG A”. Updated Existing Conditions HydroCAD calculations and Required Recharge Calculations are included in the revised Master Plan. Portions of the updated “Table 4 Peak Discharge Rates” and “Table 5 Total Volume of Discharge” are provided below to reflect the updates to the existing conditions at Design Point 1, and demonstrate that hydrologically the Project will continue to reduce the rate and volume of stormwater discharge from the site. As documented in the updated Master Plan, the proposed conditions will increase in pervious area is within the HSG B area, resulting in an increase of recharge of 3,000 cubic feet of recharge compared to the existing condition.**

**Table 4  
 Peak Discharge Rates (cfs\*)**

<i>Design Point</i>	<i>1-inch</i>	<i>2-year</i>	<i>10-year</i>	<i>25-year</i>	<i>100-year</i>
<b>Design Point: DP-1 (48" RCP Across Boston Post Rd)</b>					
Existing	1.8	26.0	45.7	64.2	116.1
Proposed	1.7	20.5	44.8	59.0	110.2

**Table 5**  
**Total Volume of Discharge (acre-ft)**

Design Point	1-inch	2-year	10-year	25-year	100-year
<b>Design Point: DP-1 (48" RCP Across Boston Post Rd)</b>					
Existing	0.5	6.6	13.5	19.5	33.9
Proposed	0.3	5.8	12.6	18.6	32.9

- Standard 4 requires that the stormwater system be designed to remove 80% Total Suspended Solids (TSS) and to treat 1.0-inch of volume from the impervious area for water quality: The Applicant has stated that the stormwater management system is designed to remove a minimum of 80 percent of the Total Suspended Solids (TSS). To confirm compliance with this standard, HW recommends that the Applicant provide potential BMP trains that are anticipated with TSS removal rates. The trains may include deep sump catch basins, infiltration, water quality units, forebays (with sizing criteria considered), and the existing wet pond. It is important to note that the 80% TSS removal rate must be achieved at each outlet discharging to a receiving wetland and that 44% TSS removal rate must be achieved prior to discharging to an infiltration system. HW recommends that the Master Plan document the anticipated water quality volume required for each phase based on the expected impervious area.*

**TSS removal spreadsheets showing a few potential BMP treatment trains are included in the updated Master Plan. The treatment trains shown provided as examples of potential scenarios which will be finalized with the design of each phase, however they illustrate how the treatment objectives of the project are using the various BMPs proposed for the overall development. TSS removal spreadsheets will be created for each phase and submitted as part of that phased Stormwater Report.**

- Standard 5 is related to projects with a Land Use of Higher Potential Pollutant Loads (LUHPPL). The Applicant has acknowledged that the site will include parking lots with high-intensity-uses and that these areas of the project site will be considered Land Use of Higher Potential Pollutant Loads (LUHPPL). HW recommends that the Applicant provide guidance in the Master Plan listing the BMPs recommended for the project areas designated as LUHPPLs.*

**The Master Plan will be revised to list the following BMPs for the project as acceptable within LUHPPLs:**

**Anticipated BMPs:**

- **Deep Sump Catch Basins**
- **Deep Sump Manholes**
- **Sediment Forebays**
- **Water Quality Units**
- **Bioretention Areas & Rain Gardens**
- **Drywells: only used for runoff from non-metal roofs (not allowed BMP for runoff from LUHPPLs)**
- **Infiltration Basins**
- **Subsurface Infiltration Structures**

**Potential BMPs:**

- **Vegetated Filter Strips**
- **Constructed Stormwater Wetlands**
- **Extended Dry Detention Basin**
- **Proprietary Media Filters (i.e. Tree Box Filter)**
- **Sand/Organic Filter**
- **Wet Basins**
- **Drainage Channels**
- **Grassed Channel (Biofilter Swale)**
- **Water Quality Swale**
- **Infiltration Trench**
- **Leaching Catch Basins**

6. *Standard 6 is related to projects with stormwater discharging into a critical area, a Zone II or an Interim Wellhead Protection Area of a public water supply: The project site is located within a Zone II Interim Wellhead Protection Area; HW recommends that the Applicant provide guidance in the Master Plan listing recommended BMPs that would be appropriate for this site.*

**The Master Plan will be revised to list the following BMPs recommended for the project as acceptable BMPs to use where discharge would be near or to a critical area:**

**Anticipated BMPs**

- **Deep Sump Catch Basins**
- **Deep Sump Manholes**

- **Sediment Forebays**
- **Grassed Channels**
- **Bioretention Areas & Rain Gardens (44% pretreatment)**
- **Drywells: only used for runoff from non-metal roofs**
- **Infiltration Basin**
- **Subsurface Infiltration Structures**

**Potential BMPs:**

- **Vegetated Filter Strips**
- **Constructed Stormwater Wetlands**
- **Gravel Wetlands**
- **Proprietary Media Filters (i.e. Tree Box Filter)**
- **Sand/Organic Filter**
- **Wet Basins**
- **Grassed Channel (Biofilter Swale)**
- **Water Quality Swales**
- **Infiltration Trenches**

7. *Standard 7 is related to projects considered Redevelopment. The proposed project is considered a redevelopment and the Applicant has stated that the Project will be designed to be substantially compliant with the MSH for new development. The intention to design the site in accordance with the new development criteria, except where impractical due to depth to groundwater, appears reasonable and is required. The Redevelopment criteria as described in the MSH also requires improving existing conditions. It appears that the intentions described in the Preliminary Stormwater Management Master Plan will improve the quantity and quality of stormwater discharging from the site. The recommendations suggested by HW are to further manage future designs in the event the proposed development is put on hold for a significant period of time.*

**No Response needed.**

8. *Standard 8 requires a plan to control construction related impacts including erosion, sedimentation or other pollutant sources: The Applicant has stated that an erosion control plan and a Stormwater Pollution Prevention Plan (SWPPP) will be developed individually for each phase of construction. It is reasonable to evaluate the specific details during the permitting process for each phase. In the event that various phases are constructed simultaneously the Applicant should verify that the proposed erosion control methods function in harmony. For instance it may be reasonable to utilize the same construction entrance for various phases and verify that the location of the erosion control barriers (e.g. straw bale or silt sock) for one phase*

*are not in conflict with the vehicle access to a separate phase.*

**Agreed. The Erosion control measures will be reevaluated after each phase and noted on plans and in reports that all erosion control measures shall function in harmony with other phases if simultaneous phased construction occurs.**

9. *Standard 9 requires a Long Term Operation and Maintenance (O & M) Plan to be provided: The Applicant has stated that the Long Term Operation and Maintenance (O&M) Plan will be developed during the review process of the future filings. If the O&M Plan will be specific to each phase of development it appears reasonable to evaluate the specific details during the permitting process for each phase of development. If the property owner for the entire 50 acre parcel will be the same party it would be reasonable to provide the name and contact information of the property owner at the Master Plan stage. The maintenance of the stormwater basin in the center of the project site is critical to the success of the entire stormwater management system. It may be valuable to the Town of Sudbury to have a commitment from the property owner for future maintenance of the central stormwater basin.*

**At this time, maintenance for the entire site will ultimately be the responsibility of the property owner, including the central stormwater basin. Per the Order of Conditions issued for the Site under MassDEP File # 301-1083 on August 21, 2012, the Stormwater Operation & Maintenance Plan dated July 20, 2012 indicates that the vegetated drainage system, including the Retention Basin, shall be inspected annually. All sediment and debris shall be removed and disposed according to local, state and federal regulations. Additional small-scale maintenance shall occur at regular intervals, including inspections regarding:**

- **Notable changes in the general extent of standing water;**
- **Stability of embankments, channels, and outfall areas; and,**
- **Accumulation of sediment.**

**The Owners contact information is provided below, and the revised Master Plan will be updated accordingly:**

**BPR Sudbury Development LLC  
c/o National Development  
2310 Washington Street  
Newton Lower Falls, Massachusetts 02462  
Ph: (617) 527-9800**

10. *Standard 10 requires an Illicit Discharge Compliance Statement be provided: The Applicant has stated that the wastewater and stormwater designs as well as the long term Pollution Prevention Plan will include measures to prevent illicit discharges from occurring post construction. HW recommends that as stated in Volume 1, Chapter 1, page 25 of the Massachusetts Stormwater Handbook, a Certificate of Compliance should not be issued by the Sudbury Conservation Commission until it has been determined that the Illicit Discharge Compliance Statement has been submitted and that it has been verified that there are no illicit discharges occurring on the site.*

**There are no known illicit discharges presently on the site and the proposed project is designed to avoid illicit discharges. The owner / applicant agrees to provide an illicit discharge statement in support of each phase of the project once constructed.**

11. *Water Quality Certification Regulations: The Applicant has stated that the Preliminary Stormwater Management Master Plan has been prepared to demonstrate compliance with the Water Quality Certification Regulations (314 CMR 9.00). It is not clear from the submitted documents how this project triggers the Certification or how they have demonstrated compliance.*

**This project does not trigger the water quality certification regulations because it does not propose to impact state regulated resource areas. This reference is removed from the Updated Master Plan.**

12. *Massachusetts Category 5 Waters: The Applicant has stated that Site lies within the Nobscot sub-watershed which flows via an unnamed stream to Hop Brook. Hop Brook is listed as "Waters requiring a TMDL". HW recommends that the Applicant contact MassDEP to determine whether the discharge from this Site is required to comply with the TMDL for Hop Brook.*

**The site is in the watershed of Hop Brook, which is classified as an impaired waterway requiring a TMDL for impairments including dissolved oxygen saturation, excess algal growth, dissolved oxygen and total phosphorous. Because a TMDL has not been determined for Hop Brook, there are no required performance standards for discharges in the watershed. While not specifically noted in the Stormwater Master Plan, the proposed suite of BMPs and the reduction of impervious area on the site will provide improvements relative to these impairments relative to the no-build condition. Recharge is generally considered the best way to remove phosphorous from stormwater and has a beneficial impact on stormwater temperatures.**

# Horsley Witten Group

*Sustainable Environmental Solutions*

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March 22, 2016

Ms. Jody Kablack  
Director of Planning and Community Development  
Town of Sudbury  
278 Old Sudbury Road  
Sudbury, Massachusetts 01776

Re: Peer Review for Preliminary Stormwater Management Master Plan  
Meadow Walk, Boston Post Road  
Sudbury, Massachusetts

Dear Ms. Kablack and Board Members:

The Horsley Witten Group (HW) is pleased to provide the Sudbury Planning Board with this letter report summarizing our initial review of the Preliminary Stormwater Management Master Plan for 526 & 528 Boston Post Road Redevelopment, Sudbury, Massachusetts (Site). The plans and calculations were prepared for BPR Sudbury Development LLC (Applicant) by VHB. The Full Build Redevelopment project, known as Meadow Walk, involves the demolition of nearly all of the existing buildings and parking areas on the site. The proposed development will maintain an existing 15,000 square foot building and will upgrade the existing wastewater treatment plant. The redevelopment of the entire 50 acre site will be completed in Phases, including a new grocery store, various retail/restaurant buildings, multi-family housing, age-restricted housing, senior housing, and open space. In the center of the site is a large existing stormwater retention basin that will be incorporated into the proposed design.

The Applicant has provided a Full Build Master Plan with a preliminary stormwater management plan intending to meet the Massachusetts Wetlands Protection Act regulations, as well as the Massachusetts Stormwater Standards; the Water Quality Certification regulations; and the Town of Sudbury Stormwater Management Regulations. The Master Plan will provide the general stormwater framework. Each Phase of design will provide specific details and additional documentation.

The following documents and plans, prepared by VHB, were reviewed by HW:

- Preliminary Stormwater Management Master Plan, dated November 2015
- Utility Infrastructure Memorandum, dated February 8, 2016
- Existing Conditions Plan of Land, Sv-1 – Sv-6, dated January 25, 2016
- Preliminary Master Development Plan, Z-1, dated February 8, 2016
- Draft Proposed Conditions Site Plan, printed February 11, 2016

### **Stormwater Review**

HW has reviewed the proposed stormwater management designs as per the standards of the Massachusetts Stormwater Handbook (MSH) dated February 2008 and the Town of Sudbury Stormwater Management Bylaw Regulations (Stormwater Bylaws), revised January 23, 2013.

In accordance with Section 8.0 of the Stormwater Bylaws, this project is required to comply with the performance standards of the MSH. Therefore, we have used the MSH as the basis for organizing our comments. However, in instances where the additional criteria established in Section 8.A.3 of the Stormwater Bylaws requires further recommendations; we have referenced these as well.

1. *Standard 1: No new stormwater conveyances (e.g. outfalls) may discharge untreated stormwater directly to or cause erosion in wetlands or waters of the Commonwealth.*

The Applicant has stated that untreated stormwater discharging to or causing erosion in wetlands or water bodies will not be allowed in connection with this project. A review of the preliminary Master Plan suggests that at a minimum prior to discharging to the central retention basin (Wetland 3) stormwater will be treated by deep sump catch basins and forebays and that no new outfalls will be created. However the potential discharge into the various other wetland areas is not clear. It appears that there are existing discharge points into Wetland 1, Wetland 2, Wetland 4, and Wetland 6. HW recommends that the final stormwater design for each phase of development confirm that an appropriate treatment train is being provided prior to each discharge point and that the velocities at the outfalls be provided to verify that erosion will not occur within any on-site wetland resource area.

2. *Standard 2: Stormwater management systems shall be designed so that post-development peak discharge rates do not exceed pre-development peak discharge rates.*

The Applicant has provided both the preliminary Existing and the Proposed Drainage Conditions watershed maps and HydroCAD modeling analysis for the various phases of development. From a preliminary perspective the watershed areas, times of concentration (Tc), and curve numbers (CN) appear appropriate for the various catchment areas and the post-development peak discharge rates and volumes do not exceed the pre-development peak discharge rates. HW recommends that the preliminary Master Plan calculations be included as a reference with the design of each phase to verify that the design features such as the amount of impervious area and the sizing of any proposed best management practices (BMPs) are consistent with the approved Master Plan.

3. *Standard 3 requires that the annual recharge from post-development shall approximate annual recharge from pre-development conditions.*

- a) The Applicant has noted that the impervious area of the entire site will be reduced under the proposed layout and therefore the recharge criteria are met. The Applicant has

provided Table 3 under Proposed Drainage Conditions that will be used as a comparison to verify that each phase of construction is consistent with the Master Plan. Moving forward with each phase of development, the Applicant will be held to the maximum amount of impervious area allowed within each phase as listed in Table 3. HW recommends that the Applicant include in the Master Plan a list of potential recharge practices that are approvable by the Town of Sudbury as well as acceptable BMPs and an anticipated volume to recharge based on proposed impervious area.

b) The Applicant has provided Recharge Calculations in the Master Plan; however it is not clear where the additional 2.2 acres of HSG A is located on the site.

4. *Standard 4 requires that the stormwater system be designed to remove 80% Total Suspended Solids (TSS) and to treat 1.0-inch of volume from the impervious area for water quality.*

The Applicant has stated that the stormwater management system is designed to remove a minimum of 80 percent of the Total Suspended Solids (TSS). To confirm compliance with this standard, HW recommends that the Applicant provide potential BMP trains that are anticipated with TSS removal rates. The trains may include deep sump catch basins, infiltration, water quality units, forebays (with sizing criteria considered), and the existing wet pond. It is important to note that the 80% TSS removal rate must be achieved at each outlet discharging to a receiving wetland and that 44% TSS removal rate must be achieved prior to discharging to an infiltration system. HW recommends that the Master Plan document the anticipated water quality volume required for each phase based on the expected impervious area.

5. *Standard 5 is related to projects with a Land Use of Higher Potential Pollutant Loads (LUHPPL).*

The Applicant has acknowledged that the site will include parking lots with high-intensity-uses and that these areas of the project site will be considered Land Use of Higher Potential Pollutant Loads (LUHPPL). HW recommends that the Applicant provide guidance in the Master Plan listing the BMPs recommended for the project areas designated as LUHPPLs.

6. *Standard 6 is related to projects with stormwater discharging into a critical area, a Zone II or an Interim Wellhead Protection Area of a public water supply.*

The project site is located within a Zone II Interim Wellhead Protection Area; HW recommends that the Applicant provide guidance in the Master Plan listing recommended BMPs that would be appropriate for this site.

7. *Standard 7 is related to projects considered Redevelopment.*

The proposed project is considered a redevelopment and the Applicant has stated that the Project will be designed to be substantially compliant with the MSH for new development. The

intention to design the site in accordance with the new development criteria, except where impractical due to depth to groundwater, appears reasonable and is required. The Redevelopment criteria as described in the MSH also requires improving existing conditions. It appears that the intentions described in the Preliminary Stormwater Management Master Plan will improve the quantity and quality of stormwater discharging from the site. The recommendations suggested by HW are to further manage future designs in the event the proposed development is put on hold for a significant period of time.

8. *Standard 8 requires a plan to control construction related impacts including erosion, sedimentation or other pollutant sources.*

The Applicant has stated that an erosion control plan and a Stormwater Pollution Prevention Plan (SWPPP) will be developed individually for each phase of construction. It is reasonable to evaluate the specific details during the permitting process for each phase. In the event that various phases are constructed simultaneously the Applicant should verify that the proposed erosion control methods function in harmony. For instance it may be reasonable to utilize the same construction entrance for various phases and verify that the location of the erosion control barriers (e.g. straw bale or silt sock) for one phase are not in conflict with the vehicle access to a separate phase.

9. *Standard 9 requires a Long Term Operation and Maintenance (O & M) Plan to be provided.*

The Applicant has stated that the Long Term Operation and Maintenance (O&M) Plan will be developed during the review process of the future filings. If the O&M Plan will be specific to each phase of development it appears reasonable to evaluate the specific details during the permitting process for each phase of development. If the property owner for the entire 50 acre parcel will be the same party it would be reasonable to provide the name and contact information of the property owner at the Master Plan stage. The maintenance of the stormwater basin in the center of the project site is critical to the success of the entire stormwater management system. It may be valuable to the Town of Sudbury to have a commitment from the property owner for future maintenance of the central stormwater basin.

10. *Standard 10 requires an Illicit Discharge Compliance Statement be provided.*

The Applicant has stated that the wastewater and stormwater designs as well as the long term Pollution Prevention Plan will include measures to prevent illicit discharges from occurring post construction. HW recommends that as stated in Volume 1, Chapter 1, page 25 of the Massachusetts Stormwater Handbook, a Certificate of Compliance should not be issued by the Sudbury Conservation Commission until it has been determined that the Illicit Discharge Compliance Statement has been submitted and that it has been verified that there are no illicit discharges occurring on the site.

11. *Water Quality Certification Regulations*

The Applicant has stated that the Preliminary Stormwater Management Master Plan has been prepared to demonstrate compliance with the Water Quality Certification Regulations (314 CMR 9.00). It is not clear from the submitted documents how this project triggers the Certification or how they have demonstrated compliance.

12. *Massachusetts Category 5 Waters*

The Applicant has stated that Site lies within the Nobscot sub-watershed which flows via an unnamed stream to Hop Brook. Hop Brook is listed as "Waters requiring a TMDL". HW recommends that the Applicant contact MassDEP to determine whether the discharge from this Site is required to comply with the TMDL for Hop Brook.

**Conclusions**

HW recommends that the Sudbury Planning Board require that the Applicant address these comments as part of the Master Plan acceptance process. The Planning Board may choose to include a condition for future phases of development within the Project Site, stating that any future design must meet the design standards as outlined in the Preliminary Stormwater Management Master Plan as well as the most current MSH and the most current Sudbury Stormwater Bylaws.

The Applicant is advised that provision of these comments does not relieve him/her of the responsibility to comply with all Town of Sudbury Codes and Bylaws, Commonwealth of Massachusetts laws, and federal regulations as applicable to this project. Please contact Janet Carter Bernardo at [jbernardo@horsleywitten.com](mailto:jbernardo@horsleywitten.com) or at 857-263-8193 if you have any questions regarding these comments.

Sincerely,

HORSLEY WITTEN GROUP, INC.



Janet Carter Bernardo, P.E.  
Senior Project Manager